



INTEGRATED IMPACT ASSESSMENT (IIA) - NON-  
TECHNICAL SUMMARY (MARCH 2020)

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## **1.0 Introduction**

- 1.1 The Brent Local Plan will replace the Council's current Core Strategy (CS), Development Management Policies (DMPs), Site Specific Allocations (SSA) and the Wembley Area Action Plan (WAAP). The Plan will guide the future development of the borough where the London Borough of Brent retains responsibility as the Local Planning Authority.
- 1.2 This non-technical summary (NTS) provides an overview of the Integrated Impact Assessment (IIA) of the draft Local Plan for the London Borough of Brent. The IIA is an iterative process which seeks to promote sustainable development through better integration of sustainability, health and equalities considerations into the preparation and adoption of the Local Plan. The IIA integrates a Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Analysis (EA) into a single framework.
- 1.3 The IIA Report is also to ensure compliance with the Planning and Compulsory Purchase Act 2004, which requires an SA to be undertaken on all development plan documents and report to be prepared. Furthermore, the report also incorporates the requirement for an Environmental Report under the Strategic Environmental Assessment Regulations.
- 1.4 This draft reports draws upon the Scoping Report which established the framework for undertaking the IIA of the plan, the scope and level of detail in regards to:
  - Social, economic and environmental baseline information for the borough;
  - Identify relevant plans, policies, programmes and initiatives; and
  - Key Sustainability issues within Brent.
- 1.5 This document has been updated and amended as part of the submission of the draft Local Plan. This follows the Regulation 19 (publication stage) of consultation, following which a number of proposed modifications have been suggested.

## **2.0 Key Sustainability Issues within Brent**

- 2.1 Through reviewing existing baseline data, plans, programmes and exiting policies, a number of key sustainability issues within Brent have been identified. These are summarised in Table 1, with Chapter 4 of the main IIA report going into more detail.

Topic	Key Issues
Population and Equality	<ul style="list-style-type: none"> <li>• Brent's population has grown significantly since 2001. It is predicted the population will continue to rise, reaching approximately 407,000 by 2050.</li> <li>• An increase in the borough's population is likely to see a change in the borough's age structure and ethnic make-up.</li> <li>• Between 2001 and 2011 there was a slight change in the make-up of Brent's resident's in terms of religion.</li> </ul>
Education and Qualifications	<ul style="list-style-type: none"> <li>• As of March 2018, there were 85 schools within Brent, and it had a school population of 51,524.</li> <li>• By 2023/2024 an additional 12 form of entry for secondary school places will be needed.</li> <li>• In 2018, there were 2076 Brent resident children and young people with an Education Health and Care Plan. The most common type of EHCP need within current school age children is Autistic Spectrum Disorder followed by Moderate Learning Difficulties.</li> <li>• In 2018, the average attainment rate at secondary level was 49.8, above the London average.</li> <li>• The largest ethnic groups of statutory school age are Asian Indian (17%) and Black Somali (9%).</li> </ul>
Health	<ul style="list-style-type: none"> <li>• Life expectancy within the borough is 85.1 years for females and 80.2 years for males. There is variation in life expectancy at ward level.</li> <li>• Obesity is a significant problem within Brent, with it projected that the number of people classed as obese will continue to rise between 2014 and 2030.</li> <li>• Mental health remains the single largest cause of morbidity in Brent</li> <li>• Over half of the borough's adult population does not participate in sport or physical activity, with the borough having one of the highest level of inactivity in West London.</li> </ul>
Crime	<ul style="list-style-type: none"> <li>• Brent has the 5<sup>th</sup> highest number of domestic abuse crimes in comparison to most similar boroughs</li> <li>• The number of crimes within Brent has increased by 3.1% in the year to 18/19</li> <li>• Brent has been identified as having a national-level gang issue.</li> <li>• ASB is a key priority within Brent, with hotspots gathered round the borough's town centres</li> <li>• In 2018, 15% of the population felt a bit unsafe walking outside in their local area alone after dark, with 10% feeling very unsafe</li> </ul>
Water	<ul style="list-style-type: none"> <li>• All waterbodies within Brent's Blue Ribbon Network are achieving a 'moderate status'.</li> <li>• Areas in proximity to Welsh Harp, Wealdstone Brook and the River Brent, and areas within the Stonebridge Ward are at risk of fluvial flooding</li> <li>• There are a number of areas within the borough which are at risk to surface water flooding</li> </ul>

	<ul style="list-style-type: none"> <li>• Areas within the borough that are located in functional floodplain are in close proximity to the River Brent.</li> <li>• There are 27 critical drainage areas within Brent</li> <li>• There are areas within the northern and western region of the borough where sewer capacity is near full utilisation</li> </ul>
Air Quality	<ul style="list-style-type: none"> <li>• Brent does not meet the national air quality targets for Nitrogen Dioxide and Particulate Matter</li> <li>• The largest contributor to poor air quality in Brent is local energy generation, construction and road transport</li> <li>• The majority of the borough falls within an Air Quality Management Area</li> </ul>
Soils and Geology	<ul style="list-style-type: none"> <li>• As of November 2014, 1778 sites were identified as having potentially contaminative historic uses. However, as at 2018, sufficient information has been identified for 360 sites as being 'contaminated' according to the statutory definition.</li> <li>• Barn Hill Open Space has been put forward for designation as a Locally Important Geological Site (LIGS), due to the presence of Dollis Hill Gravel.</li> </ul>
Climate Change	<ul style="list-style-type: none"> <li>• There are a number of 'possible' future risks that could occur in Brent as a result of climate change</li> <li>• Climate Change can increase the area within the borough which is impacted by flood risk</li> <li>• In 2017 the Mayor of London committed to London being zero-carbon by 2050</li> </ul>
Biodiversity, Flora and Fauna	<ul style="list-style-type: none"> <li>• The condition of the borough's 62 sites of importance for nature conservation (SINC) varies from poor structure and species diversity to species –rich and structurally diverse. There are invasive species present on some of these SINC.</li> <li>• The Brent Reservoir SSSI is currently in a 'favourable' condition</li> </ul>
Architectural and Archaeological Heritage	<ul style="list-style-type: none"> <li>• Brent has 1 Grade I listed building, 9 Grade II* listed buildings and almost 240 Grade II listed buildings. There are 7 properties on the Historic England's Heritage at Risk Register</li> <li>• There are 22 conservation areas and 4 archaeological priority areas (APA)</li> <li>• There are over 200 non-designated heritage assets on the Council's local list</li> </ul>

Landscape and Townscape	<ul style="list-style-type: none"> <li>• Analysis from 2007 found that a number of areas within the borough were of a low townscape quality. However, since this analysis development has occurred in some of these areas, including South Kilburn, Stonebridge and Wembley.</li> <li>• The majority of the borough is within the 'Brent Valley and Barnet Plateau' landscape area.</li> <li>• There are 180 open space within the borough. A qualitative assessment of the spaces in 2018 showed that there was variation, both across the borough and by park typology.</li> </ul>
Waste	<ul style="list-style-type: none"> <li>• The total amount of municipal waste in 2018/2019 was 106,900 tonnes, a reduction from 107,683 in 2017/2018.</li> <li>• There are 12 existing safeguarded waste sites within the borough.</li> <li>• The 2016 London Plan allocated each borough an amount of London's waste that it has to positively plan for and manage, while the new draft London Plan (intend to publish) also forecasts the arisings of household, commercial and industrial waste.</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>• The most popular mode of transport for Brent residents is the car, accounting for an average of 41% trips originating in Brent per day. Cycling accounts for 2.22% of trips made from the borough's residents, and public transport 33%.</li> <li>• There are high levels of congestion within the borough, which have an impact on the quality of life for the borough's residents</li> <li>• Brent is well served by a variety of public transport networks.</li> </ul>
Noise	<ul style="list-style-type: none"> <li>• There are a number of sources of noise pollution in the borough, which includes ambient noise and periodic local noise</li> <li>• Areas adjacent to the North Circular have been identified as being amongst the most affect by traffic noise in the UK</li> </ul>
Local Economy	<ul style="list-style-type: none"> <li>• Brent's resident workforce totals approximately 164,830 as at March 2019.</li> <li>• There are a number of Standard Occupational Classification groups that are over-represented within Brent, including skilled trade occupations and elementary occupations</li> <li>• Brent's key employment sectors are 'Motor Trades', 'Retail', 'Education' and 'Business Administration and Support Services'.</li> <li>• Micro businesses form a significant proportion of the borough's business stock</li> <li>• There is currently 395ha of active industrial land within Brent</li> <li>• In 2019, the gross annual pay in Brent was lower than the London average.</li> </ul>

Deprivation and Living Environment	<ul style="list-style-type: none"> <li>• Brent is the 49<sup>th</sup> most deprived borough in the UK</li> <li>• Between 2011-2014, levels of child poverty in Brent were higher than the London and England average</li> <li>• The claimant rate for housing benefits varies significant across the borough</li> <li>• In 2015, it was estimated that 14,702 dwellings were fuel poor</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• The draft London Plan 2018 places a requirement on the borough to deliver 2,915 dwellings per annum.</li> <li>• The 2018 SHMA indicated that the borough needed to deliver 1,920 dwellings per annum, and that there was high need for 3 bedroom properties in both the market and affordable sectors.</li> <li>• There is variation in housing stock across the borough; southern wards have a higher proportion of flats, whereas wards within the northern region have a higher proportion of houses.</li> <li>• The household size within the borough is 2.8, with it predicted to fall to 2.3 by 2050</li> <li>• House prices within Brent were above the London average for the majority of the time between 2013-2019 and were above the national average.</li> <li>• There is one gypsy and traveller site within the borough</li> </ul>

Table 1: Summary of key sustainability issues within Brent

### **3.0 The IIA process**

3.1 The IIA process, as detailed in the below table, is based on the key stages and tasks set out within the National Planning Practice Guidance

<b>Stage Name</b>	<b>Tasks</b>	<b>Status</b>
<b>Local Plan Pre-Production</b>		
Stage A: Setting the Context and Objectives, establishing the baseline and deciding on the scope.	<ol style="list-style-type: none"> <li>1. Identify and review other relevant plans and programmes, and sustainable development objectives that will affect or influence the Local Plan. Identify health related plans/programmes linked into Joint Strategic Needs Assessments</li> <li>2. Collect relevant social, environmental and economic baseline information and likely future trends, with a focus on health and equalities</li> </ol>	Completed. The Council published the scoping report for consultation between February/March 2018. The draft Scoping Report identified existing baseline information for the London Borough of Brent within a number of areas, such as housing, transport, population and climate change, identified 24 sustainability objectives that will be used

	<ol style="list-style-type: none"> <li>3. Identify key sustainability, health and equalities issues and opportunities for the IIA to address</li> <li>4. Develop the IIA framework, including defining the sustainability, health and equalities objectives, indicators and targets</li> <li>5. Produce IIA Scoping Report (incorporating RA, HIA and EA) and consult Consultation Bodies and other key stakeholders on the scope of the appraisals, key issues and possible solutions</li> <li>6. Review of Scoping Report consultation responses and preparation of final IIA Scoping Report to inform next stage</li> </ol>	to assess the impact of the policies and proposals contained within the new Local Plan.
<b>Local Plan Production</b>		
Stage B: Developing and Refining	<ol style="list-style-type: none"> <li>7. Test the Local Plan objectives against the IIA objectives</li> <li>8. Develop, refine and appraise the Local Plan Strategic Options</li> <li>9. Predicting the effects of the Local Plan, including options</li> <li>10. Evaluating the effects of the Local Plan and select preferred options</li> <li>11. Mitigating adverse effects and maximising beneficial effects</li> <li>12. Proposing measures to monitor the significant effects of the Local Plan implementation</li> </ol>	<p>Completed.</p> <p>A number of objectives, policy options and appraisals were appraised using the IIA Framework established in the Scoping Report.</p> <p>As part of the appraisal of options, a number were discounted.</p>
Stage C: Preparing the IIA report	<ol style="list-style-type: none"> <li>13. Prepare draft Local Plan (Regulation 18) and initial IIA Report (incorporating HRA, HIA and EqIA)</li> <li>14. Consult on Local Plan issues and Options (Regulation 18) and initial IIA Report</li> </ol>	<p>Completed.</p> <p>The Council has completed the 'Issues and Options' consultation of the Local Plan in February/March 2018 and the Preferred Options Local Plan in November 2018-January 2019.</p>



Stage D: Consultation on draft Local Plan (Regulation 19) and IIA Report	15. Public consultation on the draft Local Plan (Regulation 19) and IIA report 16. Production of final Local Plan and assess any significant changes in revised IIA report, if necessary	Completed The Council has completed the publication (Regulation 19) consultation of the Local Plan in October – December 2019, and modifications have been proposed to the Local Plan and the IIA report
Local Plan Examination	17. Submission of Local Plan, Pre-Submission Consultation Statement and IIA Report and Non-technical summary to Secretary of State 18. Assessing significant changes made as a result of representations, if necessary	Undergoing  The council will submit the Local Plan, Pre-Submission Consultation Statement, updated IIA report and this updated technical summary to the Secretary of State
Local Plan Adoption and Monitoring	19. Make the Local Plan and IIA Report available for public viewing 20. Produce an adoption statement and IIA Statement	
Stage E: Monitoring Implementation of the Local Plan	21. Publishing results of monitoring the sustainability effects of the Local Plan in the annual monitoring reports as new information becomes available. 22. Responding to adverse effects	

Table 2: IIA process

#### **4.0 The IIA Framework**

4.1 The IIA Framework, which consists of 24 sustainability objectives, is an important component of the IIA process. The framework (Table 3) is used to appraise the policies and proposals to determine whether they contribute to sustainable development.

4.2 The 24 sustainability objectives which form the framework have been analysed and refined through the following processes:

- Reviewing relevant plans, programmes and policies
- Identifying sustainability, health and inequality issues facing the borough through the collection of baseline data

- Discussion of IIA objectives at the IIA Stakeholder Workshop held in December 2017
- Issues and Options Consultation 2018, Preferred Options consultation 2018-2019

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
<b>Social</b>			
<p><b>Encouraging prosperity, and reducing inequalities and social exclusion</b></p> <p>S1. To promote social inclusion, narrow inequalities and address poverty for all communities within the borough.</p>	<ul style="list-style-type: none"> <li>• Will the policy/project reduce poverty and social exclusion in those areas most affected?</li> <li>• Will it improve affordability of essential services?</li> <li>• Will it promote social cohesion and integration?</li> <li>• Will it have a positive impact on reducing fuel poverty/ associated deaths?</li> <li>• Does it remove or reduce disadvantages suffered by people due to their protected characteristics?</li> </ul>	<ul style="list-style-type: none"> <li>• The borough's ranking on the Indices of multiple deprivations (IMD)</li> <li>• Number of households in fuel poverty</li> <li>• % of children in income deprived households</li> </ul>	<p>Reduce the area of the Borough within the lowest 20% IMD category from 2019 levels</p>
<p><b>Health and Well-being</b></p> <p>S2: To improve the health of the population and reduce health inequalities through access to necessary healthcare facilities and an environment that promotes physical and mental well-being</p>	<ul style="list-style-type: none"> <li>• Does it protect and enhance access to the provision of health care/community/open space/leisure facilities?</li> <li>• Will it reduce death rates?</li> <li>• Will it promote physical activity or increase participation in sport and</li> </ul>	<ul style="list-style-type: none"> <li>• Levels of obesity within the borough</li> <li>• Open Space deficient areas</li> <li>• Life expectancy – borough wide and at ward level</li> <li>• % of population participating in 30 minutes of moderate intensity sport</li> </ul>	<p>Improve life expectancy overall and reduce the difference between the average life expectancy of the best and worst performing areas of the borough.</p> <p>Reduction in the level of obesity.</p>

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<p>leisure activities for all low participation groups?</p> <ul style="list-style-type: none"> <li>• Will it promote opportunities for better food choices?</li> <li>• Will it enhance mental well-being through a safer, more stimulating and pleasant natural and built environment?</li> <li>• Will it reduce health inequalities?</li> <li>• Does it affect specific sub-groups disproportionately compared with the whole population?</li> </ul>	<ul style="list-style-type: none"> <li>• Healthy Street Scores</li> <li>• Mortality Rate</li> <li>• Number of patients registered at GP surgery</li> <li>• Number of FTE GPs within Brent</li> <li>• Proportion of the borough deficient in relation to local sport facilities</li> </ul>	<p>Increase in the percentage of the borough's population that are considered to be 'Active'.</p>
<p><b>Housing</b></p> <p>S3: To provide everybody with the opportunity to live in a home which is suitable to their identified needs</p>	<ul style="list-style-type: none"> <li>• Will it increase access to good quality and affordable housing?</li> <li>• Will it encourage mixed use and range of housing tenure types to meet the varied and in some cases specialist needs of the population?</li> <li>• Will it reduce the number of unfit homes?</li> <li>• Will it reduce homelessness/ people</li> </ul>	<ul style="list-style-type: none"> <li>• Net additional dwellings during financial year</li> <li>• Number and % of housing completions that were affordable during financial year</li> <li>• Number of specialist accommodation homes built during financial year</li> <li>• Proportion of family sized (3+ beds) homes</li> <li>• Proportion of homes split by different tenures within the Census</li> </ul>	<ul style="list-style-type: none"> <li>• The 2018 SHMA identifies that the full objectively assessed for housing in Brent is 48,000 dwellings over the Plan period 2016-41, which is equivalent to 1920 dwellings per annum. This includes the objectively assessed need for affordable housing of 22,100 dwellings over the same period, equivalent to an average of 884 dwellings per annum.</li> </ul>

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<p>living in temporary accommodation?</p> <ul style="list-style-type: none"> <li>Will it provide an opportunity to maintain or increase owner-occupier levels?</li> </ul>	<ul style="list-style-type: none"> <li>Number of people homeless/in temporary accommodation</li> </ul>	<ul style="list-style-type: none"> <li>Originally, the new draft London Plan indicated that over a 10-year period, Brent needed to provide 29,150 houses, which equates to 2,915 dwellings per annum. However, this has since been reduced to 23,250 over a ten year period (2325 units per annum).</li> <li>50% of new homes within affordable tenures</li> <li>25% of new homes 3+ beds</li> <li>Maintain or increase owner-occupation proportions at or above 2011 levels</li> <li>Older people's accommodation increased at London Plan target rates</li> <li>Reduce homeless and temporary accommodation numbers from 2017 levels</li> </ul>
<p><b>Quality of surroundings</b></p> <p>S4: To provide a safe, high quality and healthy environment for the borough</p>	<ul style="list-style-type: none"> <li>Will it improve the satisfaction of people with their neighbourhoods as places to live?</li> </ul>	<ul style="list-style-type: none"> <li>Noise levels within the borough</li> <li>Healthy Street Scores</li> <li>Accessibility to open space?</li> </ul>	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
residents to live, work and enjoy.	<ul style="list-style-type: none"> <li>• Will it improve residents' amenity and sense of place?</li> <li>• Will it reduce actual noise levels?</li> <li>• Will it reduce noise concerns?</li> </ul>		
<p><b>Crime and Preventing and Community Safety</b></p> <p>S5: To enhance community safety by reducing and preventing crime, anti-social activity and the perception of potential harm to personal safety</p>	<ul style="list-style-type: none"> <li>• Will it reduce actual levels of crime?</li> <li>• Will it reduce the fear of crime?</li> <li>• Will it reduce actual and perceived threats to personal safety for example from fire or terrorism?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of notifiable offences during financial year</li> <li>• Anti-social behaviour cases open during financial year</li> <li>• Brent Crime rate</li> <li>• Number of gangs within the borough</li> <li>• % of population who feel safe walking outside after dark</li> </ul>	
<p><b>Community Identity</b></p> <p>S6: To recognise and provide for Brent's population diversity while encouraging a shared sense of community and cultural identity/belonging, as well as engagement in local, high quality community services and facilities</p>	<ul style="list-style-type: none"> <li>• Will it meet or, if subject to change, have the potential to meet a specific diversity need that is not currently catered for in the borough?</li> <li>• Will it foster a sense of pride in area?</li> <li>• Will it increase the ability of people to influence decisions?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of community facilities within the borough</li> </ul>	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<ul style="list-style-type: none"> <li>• Will it improve ethnic relations?</li> <li>• Will it encourage communication between different communities in order to improve understanding of different needs and concerns?</li> <li>• Will it encourage people to respect and value their contribution to society?</li> </ul>		
<p><b>Accessibility</b></p> <p>S7: To maintain and enhance the role and vitality and viability of Brent's town centres and where possible improve accessibility to a range of services and facilities, such as healthcare and education, especially for the most vulnerable</p>	<ul style="list-style-type: none"> <li>• Will the development maintain or enhance the role and vitality and viability of Brent's town centre?</li> <li>• Will it improve accessibility to key local services?</li> <li>• Will it improve the level of investment in key community services?</li> <li>• Will it make access more affordable?</li> <li>• Will it make access easier for those without access to a car?</li> </ul>	<ul style="list-style-type: none"> <li>• Proportion of new homes or floorspace within 800 metres of a town centre</li> <li>• Footfall in Brent town centres</li> <li>• Level of ground floor vacancies in Brent town centres</li> <li>• Average rent for retail and other uses within Brent's town centres</li> <li>• Number of patients registered at a GP practice</li> <li>• Number of schools within the borough</li> <li>• Open space deficient areas</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced levels of vacancy within the borough's town centres</li> <li>• Increase footfall in major town centres</li> </ul>
<b>Environmental</b>			

<b>Integrated Impact Assessment Objectives</b>	<b>Criteria</b>	<b>Potential Indicators</b>	<b>Targets</b>
<p><b>Traffic</b></p> <p>EN1: To reduce the effect of traffic on the environment through actively reducing the need to travel and promoting sustainable modes of movement</p>	<ul style="list-style-type: none"> <li>• Will it reduce the need to travel?</li> <li>• Will it reduce traffic volumes?</li> <li>• Will it increase the proportion of journeys using modes other than the car?</li> <li>• Will it encourage walking and cycling?</li> </ul>	<ul style="list-style-type: none"> <li>• Modal share</li> <li>• Proportion of new homes and other floorspace within areas of PTAL scores of 4 or more</li> <li>• Vehicle km travelled by mode each year</li> <li>• PTAL levels</li> <li>• Km of cycle and walking routes within the borough</li> <li>• Car Parking Spaces created during financial year</li> <li>• Proportion of underground/over ground stations with step free access.</li> </ul>	<ul style="list-style-type: none"> <li>• Increase modal share of walking to 30% by 2021/22</li> <li>• Increase modal share of cycling to 3% by 2021</li> </ul>
<p><b>Waste Management</b></p> <p>EN2: To reduce the production of waste and use of non-renewable materials and maximising re-use and recycling.</p>	<ul style="list-style-type: none"> <li>• Will it minimise the production of waste and use of non-renewable materials?</li> <li>• Will it promote recycling?</li> <li>• Where reuse or recycling is not possible will it encourage potential for energy from waste to minimise volumes of land-fill?</li> </ul>	<ul style="list-style-type: none"> <li>• Recycling and composting rates</li> <li>• Amount of waste collected during financial year</li> </ul>	<ul style="list-style-type: none"> <li>• The new draft London Plan (Intend to Publish) contains the following figures for projected waste arising:</li> <li>• 2021 – household commercial and industrial waste – 259,000 tonnes</li> <li>• 2041 – household, commercial and industrial waste – 274,000 tonnes</li> </ul>

<b>Integrated Impact Assessment Objectives</b>	<b>Criteria</b>	<b>Potential Indicators</b>	<b>Targets</b>
<p><b>Water Quality and Resources</b></p> <p>EN3: To improve quality of the water bodies within the borough to 'good', protect ground water quality, conserve water resources and provide for sustainable sources of water supply.</p>	<ul style="list-style-type: none"> <li>• Will it improve the quality of inland water?</li> <li>• Will it reduce water consumption?</li> <li>• Will it reduce combined sewer overflow events?</li> </ul>	<ul style="list-style-type: none"> <li>• Water Consumption Levels</li> <li>• Water Quality Levels</li> <li>• WFD status of waterbodies in the borough</li> </ul>	<ul style="list-style-type: none"> <li>• All water bodies to achieve a 'good' status by 2027</li> </ul>
<p><b>Environmental Health</b></p> <p>EN4: Minimise air, noise and light pollution and improve existing areas of poor air quality and contaminated land.</p>	<ul style="list-style-type: none"> <li>• Will it improve air quality?</li> <li>• Will it reduce noise pollution?</li> <li>• Will it reduce light pollution?</li> <li>• Will it help to achieve the objectives of the Air Quality Management Plan?</li> <li>• Will it reduce emissions of key pollutants?</li> </ul>	<ul style="list-style-type: none"> <li>• Amount of contaminated land remediated</li> <li>• Status of water bodies within the borough</li> <li>• % of borough within AQMA</li> <li>• Noise levels within the borough</li> </ul>	
<p><b>Biodiversity</b></p> <p>EN5: To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna, water bodies and increase opportunities for people to access nature in all areas of the borough</p>	<ul style="list-style-type: none"> <li>• Will it conserve and enhance habitats of borough or local importance and create habitats in areas of deficiency?</li> <li>• Will it promote naturalisation and enhancement of rivers?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of SINC's within the borough</li> <li>• Changes in the areas and populations of biodiversity importance</li> <li>• Status of water bodies within the borough</li> <li>• Number of TPOs created during financial year</li> </ul>	<ul style="list-style-type: none"> <li>• All water bodies to achieve a 'good' status by 2027</li> <li>• Development schemes within the borough achieve a net gain for biodiversity</li> </ul>



Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<ul style="list-style-type: none"> <li>• Will it conserve and enhance species diversity; and in particular avoid harm to protected species?</li> <li>• Will it maintain and enhance woodland cover and management?</li> <li>• Will it encourage protection of and increase the number of trees?</li> <li>• Will it improve access to the borough's biodiversity?</li> <li>• Will it improve connectivity between the boroughs habitats by creating a network of green infrastructure?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of TPOs within the borough</li> <li>• Proportion of developments that incorporate green roofs or other features that have potential to enhance biodiversity</li> <li>• DEFRA Biodiversity calculator for developments and Borough schemes.</li> <li>• Mapping exercise every 3-5 years of newly created habitat to track efforts of improved landscape connectivity won through development and schemes.</li> <li>• River morphology surveys through the Brent Catchment Partnership to qualify the natural state and functioning of the Brent's rivers.</li> </ul>	
<p><b>Landscape and Townscape</b></p> <p>EN6: Create, enhance and maintain attractive and clean environments including</p>	<ul style="list-style-type: none"> <li>• Will it enhance the quality of priority areas for townscape and public realm enhancements?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of Anti-Social Behaviour cases opened for littering</li> <li>• Developments occurring in priority areas for</li> </ul>	

<b>Integrated Impact Assessment Objectives</b>	<b>Criteria</b>	<b>Potential Indicators</b>	<b>Targets</b>
protecting and enhancing the borough's landscape and townscape.	<ul style="list-style-type: none"> <li>• Will it minimise visual intrusion and protect views?</li> <li>• Will it decrease litter in urban areas and open spaces?</li> </ul>	townscape and public realm enhancements <ul style="list-style-type: none"> <li>• Quality status of the borough's open spaces (Green Flag)</li> </ul>	
<b>Historic Environment and Cultural Assets</b>  EN7: To protect and where appropriate enhance the historic environment and cultural assets.	<ul style="list-style-type: none"> <li>• Will it protect and enhance Conservation Areas and other sites?</li> <li>• Will it protect and enhance features and areas of historical and cultural value, such as assets of community value?</li> <li>• Will it protect listed buildings?</li> <li>• Will it help preserve and record archaeological features?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of buildings on heritage at risk register</li> <li>• Number of listed buildings</li> <li>• Number of conservation areas</li> <li>• Number of buildings on the borough's Local List</li> <li>• Changes in the number of public houses</li> <li>• Changes in number of music venues, nightclubs, cinemas, theatres and art galleries</li> </ul>	<ul style="list-style-type: none"> <li>• No buildings on the heritage at risk register</li> </ul>
<b>Climate Change Mitigation</b>  EN8: To mitigate against the impacts of climate change, predominately through reducing greenhouse gas emissions	<ul style="list-style-type: none"> <li>• Will it reduce emissions of greenhouse gases by reducing energy consumption?</li> <li>• Will it lead to an increased proportion of energy needs being met from local district heating and energy networks or renewables sources?</li> </ul>	<ul style="list-style-type: none"> <li>• Renewable energy installed by type</li> <li>• Proportion of dwellings/other floorspace connect to combined heat and power of district heating networks</li> <li>• Greenhouse gas emissions, by source, within the borough</li> </ul>	<ul style="list-style-type: none"> <li>• National target or reducing greenhouse gas emissions by 80% by 2050</li> <li>• In 2017, the Mayor of London committed London to being zero carbon by 2050. This target is applicable to Brent.</li> </ul>

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<ul style="list-style-type: none"> <li>• Will it reduce emission of ozone depleting substances?</li> </ul>	<ul style="list-style-type: none"> <li>• Progress made against the actions contained within the Council's Climate Change Strategy</li> </ul>	
<p><b>Climate Change Adaption</b></p> <p>EN9: Promote measures which adapt against the impact of climate change</p>	<ul style="list-style-type: none"> <li>• Will it reduce the risk of damage to property from storm events?</li> <li>• Will it maintain or ideally reduce the potential for over-heating/urban heat island effect?</li> </ul>	<ul style="list-style-type: none"> <li>• Renewable energy installed by type</li> <li>• SuDS installed during financial year</li> <li>• Number of developments built within a flood zone area</li> </ul>	<ul style="list-style-type: none"> <li>• National target of reducing greenhouse gas emissions by 80% by 2050</li> <li>• In 2017, the Mayor of London committed London to being zero carbon by 2050. This target is applicable to Brent.</li> </ul>
<p><b>Land and Soil</b></p> <p>EN10: To safeguard and conserve soil quality and quantity within the borough</p>	<ul style="list-style-type: none"> <li>• Will it minimise development on Greenfield sites?</li> <li>• Will it ensure that where possible; new development occurs on derelict, vacant and underused previously developed land and buildings?</li> <li>• Will it ensure land is remediated as appropriate?</li> <li>• Will it minimise the loss of soils to development?</li> <li>• Will it maintain and enhance soil quality?</li> </ul>	<ul style="list-style-type: none"> <li>• Soil quality within the borough</li> <li>• Number of LGIS within the borough</li> </ul>	<ul style="list-style-type: none"> <li>• Protect Barnhill as a Locally Important Geological Site (LGIS)</li> </ul>

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
<p><b>Open Space</b></p> <p>EN11: Protect, enhance, and where possible increase the amount of open spaces that are high quality, easily accessible and multi-functional.</p>	<ul style="list-style-type: none"> <li>• Will it reduce the risk of subsidence?</li> <li>• Contribute to addressing areas of open space deficiency?</li> <li>• Improve the quality of open space?</li> <li>• Increase the accessibility of an open space?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of open spaces within the borough</li> <li>• Open space deficient areas within the borough</li> <li>• Loss of open space during financial year</li> <li>• Number of open spaces obtaining Green Flag standard or equivalent</li> <li>• Public opinion on open spaces within the borough</li> </ul>	<ul style="list-style-type: none"> <li>• No open space deficient areas within the borough</li> <li>• All open spaces are of 'good' or better quality</li> </ul>
<p><b>Flood Risk</b></p> <p>EN12: To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</p>	<ul style="list-style-type: none"> <li>• Will it avoid areas of flood risk?</li> <li>• Where it cannot avoid risk areas will it minimise the risk of flooding from rivers, watercourses, surface water and sewage to people and property</li> </ul>	<ul style="list-style-type: none"> <li>• Number of applications granted permission within Flood Zone 3</li> <li>• % of borough located within undefended Flood Zone</li> <li>• Flooding Events</li> </ul>	<ul style="list-style-type: none"> <li>• No or reduced reports of property level flooding during flood events</li> <li>• No applications granted contrary to Environment Agency advice in flood Zone 3</li> </ul>
<b>Economic</b>			
<p><b>Growth and Regeneration</b></p> <p>EC1: To actively promote sustainable, resilient and inclusive economic growth and regeneration which</p>	<ul style="list-style-type: none"> <li>• Will it encourage the maintenance and provision of land and premises for identified employment needs?</li> <li>• Will it encourage new business start-ups and</li> </ul>	<ul style="list-style-type: none"> <li>• Number of employee jobs within the borough</li> <li>• Number of businesses within the borough</li> <li>• Amount of floor space development for employment by type</li> </ul>	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
tangibly benefits Brent residents and the environment	<p>opportunities for local people?</p> <ul style="list-style-type: none"> <li>• Will it promote regeneration?</li> <li>• Will it reduce disparities within the surrounding areas?</li> <li>• Will it improve business development and enhance productivity?</li> <li>• Will it improve the resilience of business and the local economy?</li> <li>• Will it promote growth in key sectors?</li> <li>• Will it promote growth in key clusters?</li> <li>• Will it enhance the impact of the area as a business location?</li> </ul>	<p>created during the financial year</p> <ul style="list-style-type: none"> <li>• Amount of employment floorspace lost during the financial year</li> </ul>	
<p><b>Employment</b></p> <p>EC2: To offer everybody the opportunity for rewarding and satisfying employment /self-employment</p>	<ul style="list-style-type: none"> <li>• Will it reduce short and long-term local unemployment?</li> <li>• Will it provide job opportunities for those most in need of employment?</li> <li>• Will it help to reduce long hours worked</li> </ul>	<ul style="list-style-type: none"> <li>• Unemployment rate within the borough</li> <li>• Employee jobs, by sector, within the borough</li> </ul>	

<b>Integrated Impact Assessment Objectives</b>	<b>Criteria</b>	<b>Potential Indicators</b>	<b>Targets</b>
<p><b>Investment</b></p> <p>EC3: To facilitate both indigenous and inward investment within the borough</p>	<ul style="list-style-type: none"> <li>• Will it reduce commuting?</li> <li>• Will it improve accessibility to work by public transport, walking and cycling?</li> <li>• Will it reduce journey times between key employment areas and key transport interchanges?</li> <li>• Will it facilitate efficiency in freight distribution?</li> </ul>	<ul style="list-style-type: none"> <li>• Journey times to key employment areas</li> <li>• Mode of travel to work</li> <li>• Number of businesses opened within the borough during financial year</li> <li>• Size of businesses opened within the borough during the financial year</li> </ul>	
<p><b>Education and Skills</b></p> <p>EC4: Maximise the potential for everybody to contribute economically through increasing and improving the provision of and access to childcare, education and training facilities, volunteering opportunities and informal employment</p>	<ul style="list-style-type: none"> <li>• Will it improve qualifications and skills of the population?</li> <li>• Will it improve access to high quality educational facilities?</li> <li>• Will it help fill key skill gaps?</li> </ul>	<ul style="list-style-type: none"> <li>• Average grades achieved during financial year for KS2, KS3, KS4 and KS5</li> <li>• Pupil population of Brent</li> <li>• OFSTED status of schools within Brent</li> <li>• Education space created during financial year</li> <li>• Education space lost during financial year</li> <li>• Demand for primary school and secondary school places within the borough</li> </ul>	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
<p><b>Efficient Infrastructure</b></p> <p>EC5: To encourage efficient infrastructure to support economic growth</p>	<ul style="list-style-type: none"> <li>• Will it reduce commuting?</li> <li>• Will it improved accessibility to employment places by public transport?</li> <li>• Will it facilitate efficiency in freight distribution?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of km travelled during the financial year by freight vehicles</li> <li>• Amount of freight carried by rail during the financial year</li> <li>• Amount of freight carried by water during the financial year</li> <li>• Number of residents employed within the borough</li> <li>• Mode of transport to work</li> <li>• Proportion of the borough within access to high speed broadband/IT infrastructure to meet modern day requirements</li> </ul>	

Table 3: IIA Framework

- 4.3 Annex I of the SEA directive requires that the ‘likely significant effects’ of the policies on the environment be assessed. The following factors and the interrelationship between them need to be considered: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material asset, cultural heritage and landscape.
- 4.4 The IIA Report has evaluated the social, environmental, economic, equality and health effects of the policies, alternative policies and site allocations. The below scoring method was used to assess the ‘likely significant effects’ of the policies, proposals, alternative options and site allocations.

Symbol	Likely effect against the IIA objectives	Description of effect
++	Significant Positive	Very likely to lead to a significant opportunity/improvement, or a series of long-term improvements, leading to large-scale permanent benefits to the sustainability objective being appraised. The impact is likely to benefit a large area of the borough, or a large proportion of the boroughs residents. The policy/project is like to create a major positive effect that could have cumulative and indirect beneficial impacts and/or improve conditions outside the specific policy or project area – will have positive transboundary effects.
+	Minor Positive	Likely to lead to moderate improvement in both short and long-term, leading to large scale temporary or medium-scale permanent benefits to the objectives being appraised. The impact is likely to be limited to a small area within the borough, or a small proportion of the boroughs residents. The magnitude of the predicted effects of the policy/option will be minor.
0	Neutral	Unlikely to have any beneficial or negative impact/effect on the objective being appraised, either in the present or future.
-	Minor Negative	Likely to lead to moderate damage/loss in both short and long-term, leading to large-scale temporary, or medium scale permanent negative impact on the objective. The impact is likely to be limited to a small area within the borough, or limited to small groups of people. The effects can either be direct or indirect, with the magnitude likely to be minor. It is also likely that it will be possible to mitigate or reverse a minor negative effect through policy or project intervention.
--	Significant Negative	Very likely to lead to significant damage in the long-term, or a series of long-term negative effects, which leads to a large-scale and permanent negative impact on the sustainability objective being appraised. The impact is likely to affect the whole, or large areas of the borough or the majority of the population. The detrimental impacts of the policy/option will be hard to reverse and are unlikely to be easily mitigated through policy or project intervention.
?	Unknown	The effect of a policy/option cannot be, or is not, known or is too unpredictable to assign a conclusive score.
-/+	Mixed	The effect is likely to be a combination of beneficial and detrimental effects, particular where effects are considered on sub-issues, areas of criteria.
N/A	Not Applicable	This is applied to objectives that will not be affected by the policy/option that is being assessed.

Table 4: Scoring method for the 'likely significant effects' of the policies, proposals, alternative options and site allocations



## 5.0 Developing and Assessing Emerging Policies and Proposals

- 5.1 An appraisal has been carried out on the sustainability of the policies and proposals contained within the Local Plan. These policies and proposals have been developed in response to government guidance, the London Plan, evidence base studies and community consultation.
- 5.2 During the preparation of the policies and proposals contained within the draft 'Preferred Options' Local Plan, a number of alternative options for a range of policy issues were appraised. Alternative assessment findings are presented in full within the IIA. Notable alternatives considered (excluding 'No Policy' alternatives) are identified in the below table:

Policy Area	Alternative Approach Considered	Reason for Rejection
Design	To identify that all areas are likely to be acceptable for tall buildings throughout the borough	The effect of this approach would predominantly be negative. Such negative effects that the development of higher levels of tall buildings throughout the borough include: increasing population densities within areas which may lack sufficient infrastructure to cope; increasing the use of the personal car, particularly within areas of low PTAL, which can lead to increases in congestion and air pollution; and, eroding local character in areas considered to be inappropriate for such development.
Housing	To achieve a housing target as set out in the examination version of the draft London Plan	Although this policy will deliver a significant amount of housing, which in turn can have economic benefits such as increased investment and construction related jobs, adopting this approach will have a number of negative environmental effects. Such effects include impacts to the environmental health of the borough, in particular air and noise quality during the construction phase of the homes, and place greater pressure on existing undeveloped areas which can impact on the quality of the environment/biodiversity. Furthermore, reaching this target will require delivery of homes to be fast-paced, which can place greater pressure on the borough's existing infrastructure, such as open space, roads and sewerage network.
Employment	To allow all local employment sites to be lost	The effect of this approach would result in a loss of local employment opportunities within the borough. Furthermore, the loss of local business can

Policy Area	Alternative Approach Considered	Reason for Rejection
		be detrimental to the character and sense of place, and require residents to travel further for employment opportunities.
Green Infrastructure	Allowing the redevelopment of poor quality open space to fund improvements to other open spaces within the borough.	The effect of this approach would see a loss in green space within the borough. The Council's open space study has shown that the growth in population is likely to put additional demand on existing open spaces and create demand for new spaces.
Town Centres	No policy to support the role of town centres	Without a policy which seeks to ensure appropriate development within town centres, it is likely that there would be a proliferation of non-retail uses such as takeaways and betting shops, and will limit resident's access to sufficient and appropriate shops.
Transport	Prioritise travel by car	Prioritising travel by car will result in higher levels of road congestion within the borough, which can result in a number of detrimental impacts, which include poor air quality, detrimental impact on mental health and well-being and reduced housing delivery as a result of more land being provided for new roads.

Table 5: Notable alternatives considered as part of the IIA process

### 5.3 Appraisal of changes to policies between Publication stage and Submission stage

Since Preferred Options stage, following representations being received, some proposed modifications have been made to the policies. However, not all of these changes have resulted in changes to scoring within the IIA. A full description of any proposed changes to IIA scoring is available in the main IIA document, in Chapter 8.

Policies BP2, BP3, BP4, BP5 and BP6 have seen upgrades in rating in relation to objectives EC4, S1, S2 and S7 due to the addition of reference to new educational, community and health facilities within these policies. Upgrades in rating in relation to objectives EN5, EN9 and EN12 are explained in relation to policy BH4. Some wording changes in policies BP2, BH1, BH3, BE2 and BE3 have not resulted in any scoring changes. A full Equalities Impact Assessment has been carried out through the IIA process, available on the Council's website.

5.4 A summary of the appraisal findings for the publication stage policy approach is contained within the below table, with each row covering a specific theme contained within the Plan.

<b>Growth Areas</b>
<ul style="list-style-type: none"> <li>• The Growth Area policies within the draft Local Plan will have a number of positive effects. Social impacts will include increasing accessibility to health facilities, increased housing offer, development being focused in areas with high transport accessibility and employment.</li> <li>• From an environmental perspective, the Growth Area policies will have positive impacts in supporting improvements to pedestrian and cycle routes, naturalisation of water corridors (such as Wealdstone Brook), and supporting energy efficient design and renewable energy.</li> <li>• Economic impacts of the Growth Area policies will be positive due to increased employment and investment opportunities.</li> <li>• Some potential minor negative and mixed impacts were identified in relation to environmental criteria, in that growth may result in an increase in waste, and impacts are mixed in relation to air quality / noise / light pollution and improving poor air quality and contaminated land.</li> <li>• Impacts in terms of equality and the 9 protected characteristics are considered to be positive.</li> </ul>
<b>Area Policies</b>
<ul style="list-style-type: none"> <li>• The Area Policies within the Draft Local Plan will have a number of positive effects. Social impacts will include improving health and wellbeing through protecting and enhancing open space, providing new homes and contributing towards a high quality environment for residents to live and work in.</li> <li>• Positive environmental impacts include the conservation and enhancement of heritage assets, the creation of new open spaces, and prioritising public transport use.</li> <li>• Positive economic impacts include the protection of creative quarters, town centre economies and promoting and protecting employment opportunities.</li> <li>• A minor negative impact could be the production of waste associated with growth.</li> <li>• Impacts in terms of equality and the 9 protected characteristics are considered to be positive.</li> </ul>
<b>Design</b>
<ul style="list-style-type: none"> <li>• Design policies contained within the Local Plan will have a number of positive effects in that they promote high quality design which seeks to maintain/enhance the appearance and character of the borough. Policies seek to minimise environmental and social impacts. Furthermore, the policies seek to ensure that the environmental impacts associated with design is minimised.</li> <li>• In regards to tall buildings, the policy approach adopted seeks to ensure that they are placed in an appropriate location, identifying areas where tall buildings are prioritised. Such an approach should ensure high quality development and that the appearance of the borough is maintained.</li> </ul>

- The only negative effect identified for the policies contained within the Design chapter was for basement development. It was identified that the removal of significant volumes of soil under existing buildings, which would increase the amount of waste arising for the site.
- A combination of positive and neutral impacts are anticipated in terms of equality and the 9 protected characteristics.

## Housing

- The key potentially positive effects of the Housing policies can be summarised as:
  - The **provision of homes which meet identified need, concentrating housing development within sustainable locations, promotes social inclusion, and creating a high quality environment.** In addition, providing a sufficient amount of affordable home within the borough will have positive social impacts, which includes **reducing certain aspects of poverty and social inclusion, and helping to improve the health and well-being** of residents.
  - The policies will have a number of positive economic benefits, such as: supporting the **viability and vitality of the borough's town centres**, particularly through encouraging residential development within town centre boundaries; supporting an increase in **improved employment opportunities** through providing workers with a place to live; and, improved **educational outcomes** through improving the quality of life for residents through the provision of an appropriate home.
  - Policy BH5 will have significant positive impacts on **social inclusion and reducing inequalities and housing.** This policy seeks to maximise affordable housing provision within the borough, which will provide a greater opportunity for those with limited resources to better meet their housing need.
  - Policy BH7 will have significant positive impact on **social inclusion and health and well-being.** This policy, which seeks to support an increase in shared accommodation and accommodation with additional support and protect existing accommodation where it is required to meet needs, will allow a variety of sectors of the community to better meet their housing needs. This in turn will have positive impacts on a resident's health and well-being.
  - Policy BH8 will have significant positive impacts on **housing and crime prevention and community safety.** Policy BH9 will have significant positive impacts on **housing and crime prevention and community safety.**
- Some minor negative impacts were identified for Policies BH1 and BH2 in relation to environmental criteria (e.g. waste management, traffic), however, positive environmental impacts are anticipated through Policy BH4.
- A combination of positive, neutral and mixed or uncertain impacts are anticipated in terms of equality and the 9 protected characteristics.

## Social Infrastructure and Community Facilities

- Potentially positive effects arising from the policy contained within this chapter include;
  - **Protecting and enhancing community facilities** which are fundamental support mechanism for those most deprived and excluded access.

- **Where possible, enhanced facilities** which can have positive impacts on **community identity and social inclusion**, and may bring other benefits such as **reduced crime rate and anti-social activity**.
- New social infrastructure and community facilities are to be easily accessible, which can promote the uptake of sustainable modes of transport to access these facilities.
- No negative impacts are anticipated in relation to social, environmental and economic criteria.
- Neutral impacts are anticipated in terms of equality and the 9 protected characteristics.

### Economy and Town Centres

- Economy policies contained within the Plan seek to ensure the economy will continue to develop and succeed, through protecting and increasing employment space within the borough, protecting local employment sites, and ensuring the appropriate mix of flexible work-spaces, such as work-live. The policies will potentially bring a number of positive effects, which can be summarised as:
  - Protecting, enhancing and increasing provision of employment floorspace within the borough can increase local employment opportunities, which can impact on resident's prosperity and reduce social isolation. This in turn can have impacts on the health and well-being of residents. Increased prosperity can also improve a resident's ability to access good quality housing. Maintaining an increasing provision of employment opportunities within the borough will also help to foster a sense of place and pride.
  - Improving local employment opportunities can reduce travel need to employment elsewhere. This in turn can may have positive environmental effects, such as reducing traffic related air-pollution. Increasing employment opportunities within the borough will support economic development and regeneration within the borough
- Town Centre Policies within the Plan seek to promote and enhance the borough's town centres. The positive effects of these policies can be summarised as:
  - Supporting the vitality and viability of town centres will help to boost the local economy, provide places for communities to congregate and social interaction to take place. Furthermore, the diversification of town centres can have positive benefits for housing, reducing the need to travel for facilities but also providing residents with opportunities to easily access modes of sustainable transport. The reduction in the need to travel for facilities is also applicable to the protection of neighbourhood parades and isolated shops.
  - Visitor Accommodation and Attractions policies are particularly predicted to promote employment opportunities and investment in Brent's economy. Promoting and protecting local markets may also lead to the regeneration of certain areas, and can help in the establishment of new retail businesses.
  - Limiting the concentration of certain uses within town centres, such as hot food takeaways, will have positive impacts not only the vitality of town centres, but on the health and well-being of residents through the promotion of a healthy lifestyle.
  - Some minor negative impacts were identified in relation to environmental criteria.

- Some minor negative impacts were identified for some policies in relation to environmental criteria. These are in relation to the potential production of waste, environmental health, climate change mitigation and climate change adaptation.
- A combination of positive and neutral impacts are anticipated in terms of equality and the 9 protected characteristics.

### **Heritage and Culture**

- Heritage and Culture policies seek to maintain and enhance the heritage and cultural assets within the borough, and build upon the borough's success of achieving the London Borough of Culture 2020. Potential positive effects associated with these policies can be summarised as:
  - Maintaining a high quality environment within the borough, and ensuring that the integrity of the facilities are maintained through the Plan period. Furthermore, the protection of the national stadium for football purposes will ensure that the country's national game will have a symbolic home of football and allow continued large attendance by many different fans to a variety of national and leading club games.
  - Protecting cultural and heritage facilities can support the establishment of a community identity and the sense of pride within a place. Furthermore, landscape and townscape can be improved through the enhancement of these facilities, and introduction of new ones i.e. art work
  - Supporting Brent's culture and creative industries can encourage investment and associated investment within the borough, in addition to providing local employment opportunities.
- It is anticipated that no minor affects will arise as a result of implementing these policies.
- Impacts are mainly anticipated to be positive and neutral in terms of equalities and impacts on the 9 protected characteristics. There is a possibility that BHC1 may have negative impacts on the protected groups of age, disability and pregnancy and maternity, although this is considered unlikely. This is further explored in the Equalities Impact Assessment.

### **Green Infrastructure**

- The Green Infrastructure policies contained within the draft Plan will potentially have a number of positive effects, particularly on environmental issues within the borough. These can be summarised as:
  - **Protection of the borough's green infrastructure**, and where possible seeking additional provision. **The policy also requires the protection, and where possible enhancements to the borough's biodiversity.**
  - Continuing to protect, and where possible enhance and provide additional green infrastructure can support improving the borough's environmental resilience. This type of infrastructure can contribute towards improving air quality, help to filter noise within the borough, act as a mitigative measure against flooding which will help to safeguard water quality, and reduce the impact of the urban heat island effect. Some of these measures contribute towards **strengthening the borough's capacity to adapt and mitigate against the impacts of climate change.**
  - Protecting and providing green infrastructure will support **improved health and wellbeing** for Brent's residents, **provide places for community to congregate, assist in reducing social isolation**, improving the quality of the borough's environment, which in turn can lead to some improvement within an areas level of deprivation and improve the quality of surroundings.
- Possible mixed effects from these policies are predicted in relation to the provision of housing, as the requirements set on development as a result of this policy could possibly result in a reduction in the developable area of the site. Furthermore, there are unknown effects that these policies would have on economic objectives.
- Policy BGI1 is assessed to have significant positive effects against water quality, biodiversity and open spaces.
- A mix of positive and neutral impacts are anticipated in terms of equalities and the 9 protected characteristics.

### Sustainable Infrastructure

- The policies contained within this chapter seek to build upon the policies contained within the draft London, and support a more local approach to addressing sustainability issues, such as air quality and flooding. The policies within this chapter will have a number of potentially positive effects, which can be summarised as:
  - Addressing local sustainability issues including the protection of air quality within the borough, and in the case of new development within Growth Areas and Air Quality Focus Areas, its enhancement. Policies also seek to ensure water efficiency, energy efficiency and protection of water quality.
  - Helping to reduce the borough's vulnerability to climate change, by planning with flooding in mind
  - Addressing environmental issues through the implementation of these policies, a number of economic and social effects are predicted. This includes improving the health and well-being of residents, reducing inequalities, enhancing the quality of surroundings, and encouraging growth and economic regeneration through providing an efficient and resilient environment.
- No negative effects were identified for the Sustainable Infrastructure policies.
- A mix of positive, neutral and mixed impacts are anticipated for the 9 protected characteristics.

## Transport

- The transport policies seek to encourage the uptake of sustainable modes of transport within the borough. The policies within this chapter will have a number of potentially positive effects, which can be summarised as:
  - Encouraging the uptake of sustainable modes of transport within the borough will have a number of positive environmental effects, such as reducing traffic volumes which has associated benefits for air quality and carbon emission, reducing noise pollution and improving health through active travel.
  - A number of environmental benefits, could arise from adopting a healthy streets approach such as improved air quality, reduction in noise pollution and the creation of additional open space and SUDS.
  - Creating a more efficient transport network within Brent will benefit businesses by improving reliability of public transport, support the economic growth of the borough and open up access to job opportunities within the borough. Furthermore, the introduction of Wi-Fi can further reduce the need to travel through allowing remote access.
- No negative effects were identified for the implementation of Transport policies.
- A mix of positive and neutral impacts are anticipated for the 9 protected characteristics.

Table 6: Summary of appraisal findings for preferred policy approach

## 6.0 Appraising Site Allocations

6.1 The 'Preferred Options' Local Plan identified a number of site allocations which have been identified for housing, employment and other uses. Sites selected were informed by the findings of the London Strategic Housing Land Availability Assessment (SHLAA), pre-application and planning applications, sites identified through the 'Issues and Options' consultation, and a review of the Council's Growth Areas.

6.2 The performance of the Local Plan site allocations were assessed using a methodology which incorporated the IIA objectives identified in Table 3.

### Site Appraisal Matrix

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
<b>S1a: Area is within a London Strategic Area</b>	Site of 1 hectare or more within a London Strategic	Site of less than 1 hectare within a London Strategic	Site boundary within 100 metres of a London	NA	Site boundary 100 metres or more from a London Strategic	NA



<b>Objective Outputs Assessment</b>	<b>Significant Positive ++</b>	<b>Minor Positive +</b>	<b>Neutral or Mixed +/- or 0</b>	<b>Unknown Effects ?</b>	<b>Minor Negative -</b>	<b>Significant Negative --</b>
<b>for Regeneration.</b>	Area for Regeneration	Area for Regeneration	Strategic Area for Regeneration		Area for Regeneration	
<b>S2a: Walking distance to healthcare facilities.</b>	NA	Within 800m of a healthcare facility	NA	NA	More than 800m from a healthcare facility	NA
<b>S2b: Walking distance to open space and sports facilities.</b>	Within 800m of an area of open space <u>and</u> within 800m of a sports facility/ leisure centre?	Within 800m of an area of open space <u>or</u> within 800m of a sports facility/leisure centre	NA	NA	More than 800m from any area of open space or sports facility/ leisure centre	NA
<b>S3a: Housing Provision Assessment.</b>	100+ homes	10-99homes	9 or fewer homes gained or lost/potential displaced	NA	10-99homes lost/potential displaced	100+ homes lost/potential displaced
<b>Crime and Preventing and Community Safety</b>	Area currently associated with high levels of crime related to layout/ uses/ social mix		Area currently associated with average levels of crime related to layout/ uses/ social mix		Area currently associated with low levels of crime related to layout/ uses/ social mix	
<b>S7a: Walking Distance to Services and Facilities.</b>	Within 800m of a town centre, <u>and</u> 2,000m of an employment area	Within 800m of a town centre	NA	NA	More than 800m from a town centre	More than 800m from a local centre <u>and</u> more than 2,000m from

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
						an employment area
<b>S7b: Walking distance to schools.</b>	Within 1,000m of a secondary school <u>and</u> 500m of a primary school	Within 500m of a primary school and more than 1,000m from a secondary school	NA	NA	More than 500m from a primary school <u>and</u> within 2,000m of a secondary school	More than 500m from a primary school <u>and</u> more than 2,000m from a secondary school
<b>EN1a: PTAL Score of Site taking account of known public transport improvements.</b>	PTAL, 6a & 6b	PTAL 5,4	PTAL 3		PTAL 2	PTAL 1, 0
<b>EN2a: Avoiding conflicts with waste management sites.</b>	NA	NA	All other sites	NA	Within 300m of an industrial area in which the WLWP considers waste uses to be acceptable	Within 300m of an active or committed waste facility
<b>EN3a</b>	NA	Opportunity to enhance setting of watercourse/ provide better	All other sites			

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
		access/ naturalisation				
<b>EN4a: Exposure to low air quality or noise.</b>			Not within an AQMA or within 50m of an A road, motorway, railway line, or industrial area		Partly within an AQMA <u>or</u> within 50m of an A road, motorway, railway line, or industrial area	Wholly within an AQMA <u>and</u> within 50m of an A road, motorway, railway line, or industrial area
<b>EN4b: Contribution to road traffic increases within AQMAs.</b>	NA	NA	All sites, within PTAL 4-6		All sites, within PTAL 3	All sites within PTAL 0-2
<b>EN4c: Within an area of contaminated land.</b>	NA	Not within an area of contaminated land	NA	Within an area of contaminated land	NA	NA
<b>EN5a: Within an area of recognised ecological value.</b>			Not within a recognised area of ecological value		Within London level ecological value designation	Within national level ecological value designation
<b>EN7a: Qualitative Assessment of Potential Impact on Heritage/ Cultural Significance.</b>			Not designated.	Carried out by Council's conservation officer.		

<b>Objective Outputs Assessment</b>	<b>Significant Positive ++</b>	<b>Minor Positive +</b>	<b>Neutral or Mixed +/- or 0</b>	<b>Unknown Effects ?</b>	<b>Minor Negative -</b>	<b>Significant Negative --</b>
<b>EN11a Presence of brownfield land, derelict buildings, and open space.</b>	Redevelopment of derelict and/ or disused brownfield site	Redevelopment of brownfield site currently in use but creating a poor environment	Redevelopment of brownfield land that is in use but does not have any poor environment issues NA	NA	Loss of greenfield land that is not designated as open space	Loss of all or part of designated open space
<b>EN12a: Flood Risk From Rivers.</b>	NA	NA	All other sites	NA	Majority (>50%) within Flood Zone 2 or Smaller proportion (1-50%) within Flood Zone 3	Majority (>50%) within Flood Zone 3
<b>EN12b: Flood Risk from Ground Water.</b>	NA	NA	All other sites	NA	Majority (>50%) within 'moderate' groundwater flood risk area <u>or</u> smaller proportion (1-50%) within 'high' or 'very high' groundwater flood risk area	Majority (>50%) within 'high' or 'very high' groundwater flood risk area
<b>EN12c: Flood Risk from Surface Water.</b>	NA	NA	All other sites	NA	Smaller proportion (1-50%) within 1 in 100 year surface	Majority (>50%) within 1 in 100 year surface water flood risk area

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
					water flood risk area	
<b>EC2a: Employment Floorspace Change</b>	> +4,500 sqm. gain	< 4,500 sqm. And > 1000 sqm. gain	< 1000 sqm. gain and < - 1000 sq.m.loss	NA	>-1000 sqm. and <-4500 sqm. loss	>-4,500 sqm. loss

Table 7: Site appraisal matrix

- 6.3 A summary of the appraisal of the Local Plan site allocations is contained within Tables 8-14. The table includes site which already have planning permission, and sites which do not.
- 6.4 Some of the site allocation policies have been subject to changes since the Publication stage version of this document, either due to representations being received or further evidence being made available as to the anticipated housing delivery on sites. Site allocation BCSA17 has been deleted. A full overview of this is given in Chapter 9 of the main IIA report.
- 6.5 A representation from the Environment Agency resulted in change to the methodology of assessing the flood risk of sites. This resulted in the ratings of some sites being changed. A full overview of this is given in Chapter 9 of the main IIA report. The updated methodology is in the table below.

	Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects	Minor Negative -	Significant Negative --
<b>Publication Stage methodology</b>	<b>EN12a: Flood Risk From Rivers.</b>	NA	NA	All other sites	NA	Majority (>50%) within Flood Zone 2 or Smaller proportion (1-50%) within Flood Zone 3	Majority (>50%) within Flood Zone 3

<b>Submission Stage methodology</b>	<b>EN12a: Flood Risk From Rivers.</b>	NA	All of site within Flood Zone 1	Smaller proportion (1-50%) within Flood Zone 2	NA	Majority (>50%) within Flood Zone 2 or Smaller proportion (1-50%) within Flood Zone 3	Majority (>50%) within Flood Zone 3
<b>Publication Stage methodology</b>	<b>EN12b: Flood Risk from Ground Water.</b>	NA	NA	All other sites	NA	Majority (>50%) within 'moderate' groundwater flood risk area <u>or</u> smaller proportion (1-50%) within 'high' or 'very high' groundwater flood risk area	Majority (>50%) within 'high' or 'very high' groundwater flood risk area
<b>Submission Stage methodology</b>	<b>EN12b: Flood Risk from Ground Water.</b>	NA	All of site is within a 'low' or no groundwater flood risk area	Smaller proportion (1-50%) within a 'moderate' groundwater flood risk area	NA	Majority (>50%) within 'moderate' groundwater flood risk area <u>or</u> smaller proportion (1-50%) within 'high' or 'very high' groundwater flood risk area	Majority (>50%) within 'high' or 'very high' groundwater flood risk area

<b>Publication Stage methodology</b>	<b>EN12c: Flood Risk from Surface Water.</b>	NA	NA	All other sites	NA	Smaller proportion (1-50%) within 1 in 100 year surface water flood risk area	Majority (>50%) within 1 in 100 year surface water flood risk area
<b>Publication Stage methodology</b>	<b>EN12c: Flood Risk from Surface Water.</b>	NA	None of the site is located within a 1 in 100 year surface water flood risk area (all other sites)	NA	NA	Smaller proportion (1-50%) within 1 in 100 year surface water flood risk area	Majority (>50%) within 1 in 100 year surface water flood risk area

**Site Allocation Appraisals (Submission Stage)**

**Central**

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
ASDA Wembley (BCSA1)	++	+	++	++	++	++	++	0	++	0	0	!	0	?	0	0	+	+	+	-
Stadium Retail Park and Fountain Studios (BCSA2)	-	+	++	++	++	++	++	0	+	0	0	!	0	?	0	0	+	0	+	-

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Brook Avenue (BCSA3)	0	+	++	++	++	++	++	0	+	0	+	-	0	?	0	0	0	-	+	-
Fifth Way/Euro Car Parts (BCSA4)	-	+	++	++	0	++	++	0	+	0	+	-	0	?	0	0	+	0	+	-
Olympic Office Centre (Network Homes) (BCSA5)	-	+	++	++	++	++	-	0	+	0	0	-	0	?	0	0	+	+	+	-
Watkin Road (BCSA6)	-	+	++	++	0	++	++	0	+	0	+	-	0	?	0	0	+	-	+	-
Wembley Park Station (BCSA7)	0	+	++	++	++	++	++	0	+	0	0	-	0	?	0	0	+	+	+	-
Wembley Retail Park (BCSA8)	-	+	++	++	0	++	-	0	+	0	0	-	0	?	0	0	+	+	+	-
First Way (BCSA9)	-	-	++	++	0	+	++	+	-	0	0	-	-	?	0	0	+	+	+	-
York House (BCSA10)	-	+	++	n/a	++	++	++	+	++	0	0	-	0	+	0	0	+	+	+	+
College of North West London, Wembley (BCSA11)	-	+	++	++	++	++	++	0	++	0	+	-	0	+	-	0	+	-	+	-
Land to South of South Way (BCSA12)	-	-	++	++	0	+	++	0	-	0	0	-	-	?	0	0	+	+	+	-
Former Malcolm House Site (BCSA13)	-	+	++	++	++	++	-	0	+	0	0	-	0	?	0	0	+	+	+	+
St Joseph's Social Club, Empire Way (BCSA14)	-	+	++	+	++	++	++	0	+	0	0	-	0	+	0	0	+	+	+	+



Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Site W10 Wembley Masterplan (BCSA15)	-	+	++	N/A	++	++	++	+	0	0	0	!	-	+	0	0	+	+	+	+
Site NW04 Wembley Masterplan (BCSA16)	-	+	++	N/A	++	++	-	+	+	0	0	!	0	+	0	0	0	+	+	-
Site W12 Wembley Park Boulevard, Wembley (BCSA18)	-	+	++	N/A	++	++	++	0	0	0	0	!	-	+	0	0	0	+	+	-
Wembley Park Station, Police Station and Adjacent Land Bridge Road (BCSA19)	+	+	++	+	++	++	++	?	++	0	0	!	0	+	0	0	0	+	+	+

Table 8: Appraisal results of site allocations within the 'Central' place

### East

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Neasden Station Growth Area (BEGA1)	++	+	++	++	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	-
Staples Corner SIL (BEGA2)	0	+	++	+	++	-	++	0	-	0	+	!	!	?	0	0	+	0	0	-
Coombe Road (BESA1)	++	+	++	++	++	++	+	0	0	0	+	!	-	?	0	0	+	-	-	+

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Edgware Road Bus Depot (BESA2)	0	+	++	++	0	++	+	0	0	0	0	!	-	?	0	0	+	+	+	-
Gower House 5 Blackbird Hill (BESA3)	+	+	+	+	++	0	+	+	0	0	0	!	-	+	0	0	++	+	-	+

Table 9: Appraisal results of site allocations within the 'East' place

### North

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Capitol Way Valley (BNSA1)	-	+	++	++	0	++	++	0	-	0	0	-	!	?	0	0	+	+	+	-
Colindale Retail Park, Multi-Storey Car Park and Southon House (BNSA2)	-	+	++	++	0	++	-	0	0	0	0	!	-	?	0	0	+	+	+	-
Queensbury LSIS and Morrisons (BNSA3)	-	+	++	++	++	++	++	0	0	0	0	!	-	?	0	0	+	0	+	-

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Former Mecca Bingo Site (BNSA4)	-	-	++	+	++	++	-	0	+	0	0	-	0	+	0	?	++	+	+	+
Former Kingsbury Library and Community Centre (BNSA5)	-	+	++	+	++	++	++	0	-	0	0	0	-	+	0	0	+	+	+	+
Ex-Volkswagen Garage (BNSA6)	-	+	+	+	++	++	-	0	-	0	0	-	-	?	0	0	+	+	+	+
Kingsbury Trade Centre (BNSA7)	-	+	++	0	++	++	+	0	-	0	0	-	-	?	0	?	+	+	+	+
Queensbury Underground Station Carpark (BNSA8)	-	-	+	+	++	+	-	0	0	0	0	-	0	+	0	0	+	+	+	-

Table 10: Appraisal results of the site allocations within the 'North' Place

### North West

	<b>Socio-economic</b>	<b>Environmental</b>
--	-----------------------	----------------------

Site	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Kenton Road Sainsbury's (BNWSA1)	-	+	++	++	0	++	-	0	+	0	0	-	0	?	0	0	+	+	+	-
Northwick Park Hospital (BNWGA1)	-	+	++	++	0	++	++	0	+	0	0	-	0	?	-	0	+	+	+	-

Table 11: Appraisal results of site allocations within the 'North West' place

### South

Site	Socio-economic							Environmental												
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Asiatic Carpets (BSSA1)	++	+	++	++	++	++	+	0	0	0	0	!	-	?	0	0	+	+	+	-
B&M & Cobbold Industrial Estate (BSSA2)	++	+	++	++	++	++	++	0	-	0	0	!	!	?	0	0	+	+	+	-
Church End Local Centre (BSSA3)	+	+	++	++	++	++	+	0	0	0	0	!	-	+	0	?	+	+	+	-
Chapman's & Sapcote Trading Estate (BSSA4)	0	+	++	++	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	-

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Willesden Bus Garage (BSSA5)	-	+	+	++	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Argenta House (BSSA6)	0	+	++	+	+	-	-	0	+	0	+	!	0	+	0	0	+	!	-	-
Bridge Park & Unisys Building (BSSA7)	++	+	++	++	++	-	+	0	0	0	0	!	-	?	0	0	+	!	-	-
McGovern's Yard (BSSA8)	-	+	+	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Barry's Garage (BSSA9)	-	+	++	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	-
Dudden Hill Community Centre (BSSA10)	-	+	+	n/a	++	++	+	0	+	0	0	!	0	+	0	0	+	+	+	-
Euro Car Rental (BSSA11)	+	+	++	+	++	++	+	0	-	0	+	!	--	?	0	0	+	+	-	-
296 – 300 High Road (BSSA12)	-	+	+	0	++	++	+	0	+	0	0	!	0	+	0	0	+	+	-	+
Learie Constantine Centre (BSSA13)	-	+	+	+	++	++	+	0	+	0	0	!	0	+	0	0	+	+	+	+
Morland Gardens (BSSA14)	+	+	++	+	++	++	++	0	+	0	0	!	0	+	0	?	0	+	+	+
Harlesden Station Junction (BSSA15)	+	+	++	0	++	++	++	0	+	0	0	!	0	?	-	0	+	+	+	-

Site	Socio-economic							Environmental												
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Mordaunt Road (BSSA16)	+	+	++	0	++	++	++	0	+	0	0	!	0	+	0	0	+	+	+	+
Harlesden Railway Generation Station (BSSA17)	+	+	++	0	++	++	++	0	+	0	0	!	0	+	0	0	+	+	+	-
Harlesden Telephone Exchange (BSSA18)	+	+	++	+	++	++	++	0	++	0	0	!	0	?	0	?	+	+	+	-
Chancel House (BSSA19)	+	+	++	0	++	++	+	0	0	0	0	!	-	-	0	0	+	+	+	-

Table 12: Appraisal results of site allocations within the 'South' place

### South East

Site	Socio-economic							Environmental												
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Austen (BSESA1)	+	+	++	+	++	+	+	0	+	0	0	!	0	+	0	0	+	+	+	-
Blake (BSESA2)	++	+	++	++	++	+	+	0	+	0	0	!	0	+	0	0	+	+	+	-
Carlton House (BSESA3)	+	+	++	++	0	+	+	0	+	0	0	!	0	+	0	0	+	+	+	+

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Carlton Infant School (BSESA4)	+	+	++	+	0	+	+	0	-	0	0	!	!	?	0	0	+	+	+	-
Craik (BSESA5)	++	+	++	-	0	+	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Crone & Zangwill (BSESA6)	+	+	++	+	0	+	+	0	+	0	0	!	0	?	0	0	+	+	+	-
Dickens (BSESA7)	+	+	++	+	++	+	+	0	0	0	0	!	-	+	0	0	+	+	+	-
Hereford House & Exeter Court (BSESA8)	++	+	++	+	0	+	+	0	++	0	0	!	0	?	0	0	+	+	+	-
Kilburn Park Junior School (BSESA9)	+	+	++	0	0	+	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Neville & Winterleys (BSESA10)	+	+	++	+	0	+	+	0	+	0	0	!	0	+	0	0	+	+	+	+
Old Granville Open Space (BSESA11)	+	+	++	+	++	+	+	0	+	0	0	!	0	?	0	0	!	+	+	-
Wordsworth & Masefield (BSESA12)	+	+	++	-	++	+	+	0	+	0	0	!	0	+	0	0	+	+	+	+

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
John Ratcliffe House (BSESA13)	+	+	++	+	0	+	+	0	+	0	0	!	0	+	0	0	+	+	+	+
William Dunbar (BSESA14)	++	+	++	++	0	+	+	0	+	0	0	!	0	?	0	0	+	+	+	+
UK Albanian Muslim Community and Cultural Centre (BSESA15)	+	+	++		0	+	+	0	+	0	0	!	0	?	0	0	+	+	+	+
OK Club (BSESA16)	+	+	++		0	+	+	0	+	0	0	!	0	+	0	0	+	+	+	+
Cricklewood Broadway Retail Park (BSESA17)	-	+	++	+	0	++	+	0	0	0	0	!	-	?	0	0	+	+	+	-
243-289 Cricklewood Broadway (BSESA18)	0	+	++	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Gaumont State Cinema (BSESA19)	+	+	++	0	++	+	+	0	+	0	0	!	0	+	0	?	0	+	+	+
Kilburn Market Square (BSESA20)	++	+	++	++	++	+	+	0	++	0	0	!	0	+	0	?	+	+	+	+



Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Sainsbury's and Garages (BSESA21)	-	+	+	+	++	++	++	0	+	0	0	!	0	?	0	0	+	+	+	-
Queens Parade (BSESA22)	-	+	+	+	++	++	++	0	+	0	0	!	0	?	0	0	+	+	+	+
Willesden Green Police Station (BSESA23)	-	+	++	+	++	++	++	0	+	0	0	!	0	+	0	0	0	+	+	+
Kilburn Station Arches, Exeter Road, NW2 3UH (BSESA24)	-	-	++	0	++	+	+	0	+	0	0	!	0	+	0	0	0	+	+	+
Park Avenue Garage (BSESA25)	-	+	+	+	++	++	+	0	0	0	0	!	-	?	0	0	+	+	+	-
Park Avenue North Substation (BSESA26)	-	+	+	0	++	++	+	0	0	0	0	!	-	?	0	0	+	+	+	-
Strode Road Car Wash (BSESA27)	-	+	++	0	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Strode Road (BSESA28)	-	+	++	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Willesden Telephone Exchange (BSESA29)	-	+	++	+	++	++	+	0	0	0	0	!	-	0	0	0	0	+	+	-

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
61 Shoot Up Hill (BSESA30)	-	+	++	+	++	++	-	0	+	0	0	!	0	?	0	?	0	+	+	+
Turpins Yard (BSESA31)	+	+	++	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	-
45-55 Cricklewood Broadway (BSESA32)	0	+	++	+	++	++	-	0	+	0	0	!	0	?	0	0	+	+	+	+
123-129 Cricklewood Broadway (BSESA33)	+	+	+	+	++	++	+	0	+	0	0	!	0	?	0	?	+	+	+	+
Kilburn Park Underground Station (BSESA34)	+	+	++	?	++	+	+	0	++	0	0	!	0	0	0	?	0	+	+	-
303-309 Cricklewood Broadway (BSESA35)	-	+	++	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+

Table 13: Appraisal results of site allocations within the 'South East' place

## South West

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Alperton Industrial Sites (BSWSA1)	-	+	++	++	++	++	-	0	+	0	+	!	0	?	0	0	+	+	0	-
Sainsbury's Alperton (BSWSA2)	-	+	++	++	++	++	-	0	0	0	+	!	-	+	0	?	0	+	0	-
Atlip Road (BSWSA3)	-	+	++	++	++	++	-	0	+	0	0	!	0	?	0	0	+	+	-	-
Sunleigh Road (BSWSA4)	-	+	++	++	++	++	-	0	-	0	+	!	!	?	0	0	+	+	-	-
Abbey Manufacturing Estate (BSWSA5)	-	+	++	++	++	++	++	0	-	0	+	!	!	?	0	0	+	+	-	-
Beresford Avenue (BSWSA6)	-	+	++	++	++	++	++	0	-	0	+	!	!	?	0	0	+	+	-	-
Northfields (BSWSA7)	0	-	++	++	++	+	++	++	0	!	+	!	!	?	-	0	++	-	-	-
Wembley High Road (BSWSA8)	-	+	++	++	++	++	++	0	+	0	0	!	0	?	-	?	+	+	+	+
Former Copland School (BSWSA9)	-	+	++	++	0	++	++	0	++	0	0	!	0	?	0	?	0	+	+	-
Elm Road (BSWSA10)	-	+	++	++	++	++	++	+	+	0	0	!	0	+	-	0	0	+	+	-

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Wembley Cutting North, Mostyn Road (BSWSA11)	-	+	++	+	++	++	++	0	+	0	0	:-	0	?	-	0	-	+	+	+
Keelers Service Centre, Harrow Road, Wembley, HA0 2LL (BSWSA12)	-	+	++	+	++	++	-	0	+	0	0	:-	0	?	0	0	+	+	+	-
Wembley Police & Fire Stations Harrow Road and Wembley Community Hospital/Chaplin Road Health Centre (BSWSA13)	-	+	++	+	++	++	++	0	+	0	0	:-	0	?	0	?	+	+	+	-
Sudbury Town Station Car Park (BSWSA14)	-	+	++	+	++	++	-	0	+	0	0	:-	0	?	-	0	-	+	+	+
Employment Land On Heather Park Drive (BSWSA15)	-	+	++	+	++	-	++	0	-	0	0	:-	:-	?	0	0	+	+	-	-
Carphone Warehouse 416	-	-	++	++	++	-	-	0	+	:-	0	:-	0	?	0	0	+	+	-	-

Site	Socio-economic								Environmental											
	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Ealing Road (BSWSA16)																				
Former Wembley Youth Centre/Dennis Jackson Centre London Road HA9 7EU (BSWSA17)	-	+	++	++	++	++	++	0	-	0	0	-	-	+	0	0	+	+	+	-

Table 14: Appraisal results of site allocations within the 'South West' place

## 7.0 Habitats Regulations Assessment

7.1 The objective of the Habitats Regulations Assessment (HRA) is to establish whether the policies of proposals in the draft Brent Local Plan will have (either alone or in combination) a likely significant effect or any site designated under European Law for its nature conservation interest. If the HRA establishes this is the case, then an Appropriate Assessment (AA) would be required to work out whether the plan will have an adverse impact on the integrity of the site(s). The HRA is a legal requirement.

7.2 The full HRA screening for the draft Brent Local Plan can be found in Appendix 3 of the full IIA report, although the HRA has been undertaken separately to the IIA assessment.

7.3 The HRA screening identified five European Sites within 15km of Brent. None of these are within or adjacent to the borough. A screening of the proposed policies and site allocations contained in the draft Local Plan found that no policies would have HRA implications.

7.4 The report identified five potential impact pathways in which development in Brent could impact on the identified European Sites. It is considered that due to the distance between Brent and these sites that there would not be a direct significant effect on the sites.

7.5 In conclusion, the policies and proposals in the draft Local Plan are not likely to have significant effects on the qualifying features and integrity of the identified European Sites, and a comprehensive Appropriate Assessment is not required.

## **8.0 Next Steps**

8.1 This IIA Report is issued for Submission to the Planning Inspectorate for independent examination alongside the draft Brent Local Plan.

8.3 Stage E is monitoring the implementation of the Plan, which will include aims and methods for modelling as well as potentially responding to adverse impacts.