



Brent

**Local Plan Integrated Impact Assessment (IIA)
February 2020**

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1. Introduction

- 1.1. The Brent Local Plan will guide the future development of the borough where the London Borough of Brent retains responsibility as the Local Planning Authority. For some parts of the borough, the Old Oak and Park Royal Development Corporation (OPDC) are currently the Local Planning Authority. The OPDC have produced their own Local Plan, which was submitted for examination in 2018. A series of public hearing sessions took place in April and July 2019. The Inspector's interim findings report has been released and the plan is being re-visited due to changes required in relation to the Cargiant site.
- 1.2. The Planning and Compulsory Purchase Act 2004 places a requirement on Local Plan authorities to undertaking a Sustainability Appraisal when preparing Development Plan Documents. Furthermore, Brent Council has a statutory duty to consider the equality impacts of decisions as part of its compliance to the Equality Act 2010.
- 1.3. The first stage of the integrated impact assessment (IIA) process was the Scoping Report, which was consulted on in February/March 2018. The Scoping Report set out the framework for undertaking the IIA of the plan and set the scope and level of detail in regards to:
 - Identifying the relevant environmental, social and economic baseline information
 - Identifying the relationship between the Local Plan and relevant plans, policies, programmes and initiatives; and
 - Identifying key sustainability issues within Brent
- 1.4. This IIA report is intended to document the assessment of the emerging Brent Local Plan, and how the policies will achieve sustainable development. It provides evidence on how the preferred policy approach was reached, and contains the evaluation of the likely significant effects that the proposed policies will have on the economy, community and environment.

This report builds upon Brent's IIA Scoping Report, which was published for consultation between 8 February to 22 March 2018. The Scoping Report set out the baseline information for the borough, identified key sustainability issues, highlighted plans, programmes and other policies which could impact the emerging Local Plan and set out the objectives which will be used to assess the plan's policies. A draft Integrated Impact Assessment of the Preferred Options Draft Brent Local Plan policies together with reasonable policy alternatives was consulted upon from 8 November 2018 to 3 January 2019. A further

version of the Integrated Impact Assessment was consulted upon from 24 October to 5 December as part of the Regulation 19 consultation of the Brent Local Plan. This version of the Assessment has been updated and amended as appropriate to reflect comments received during Regulation 19, as well as a result of any proposed modifications to the draft Local Plan policies.

What is Sustainable Development?

- 1.5. The term sustainable development has been used since 1987. It followed the publication of the World Commission on Environment and Development (WCED) report “*Our Common Future*”. This report identified the risks to the planet and the human race if existing environmental, economic and social practices and trends were perpetuated. Resolution 42/187 of the United Nations General Assembly defined sustainable development as “*meeting the needs of the present without compromising the ability of future generations to meet their own needs*”.
- 1.6. The UK Sustainable Development Strategy – *Securing the Future (2005)* - set out the following five ‘guiding principles’ of sustainable development:
- Living within the planet’s environmental limits;
 - Ensuring a strong, healthy and just society;
 - Achieving a sustainable economy;
 - Promoting good governance; and
 - Using social science responsibly
- 1.7. The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development. It identifies that to achieve sustainable development, “*the planning system as tree overarching objectives which are interdependent and need to be pursued in mutually supportive ways*”. The three objectives are identified in Figure 1.

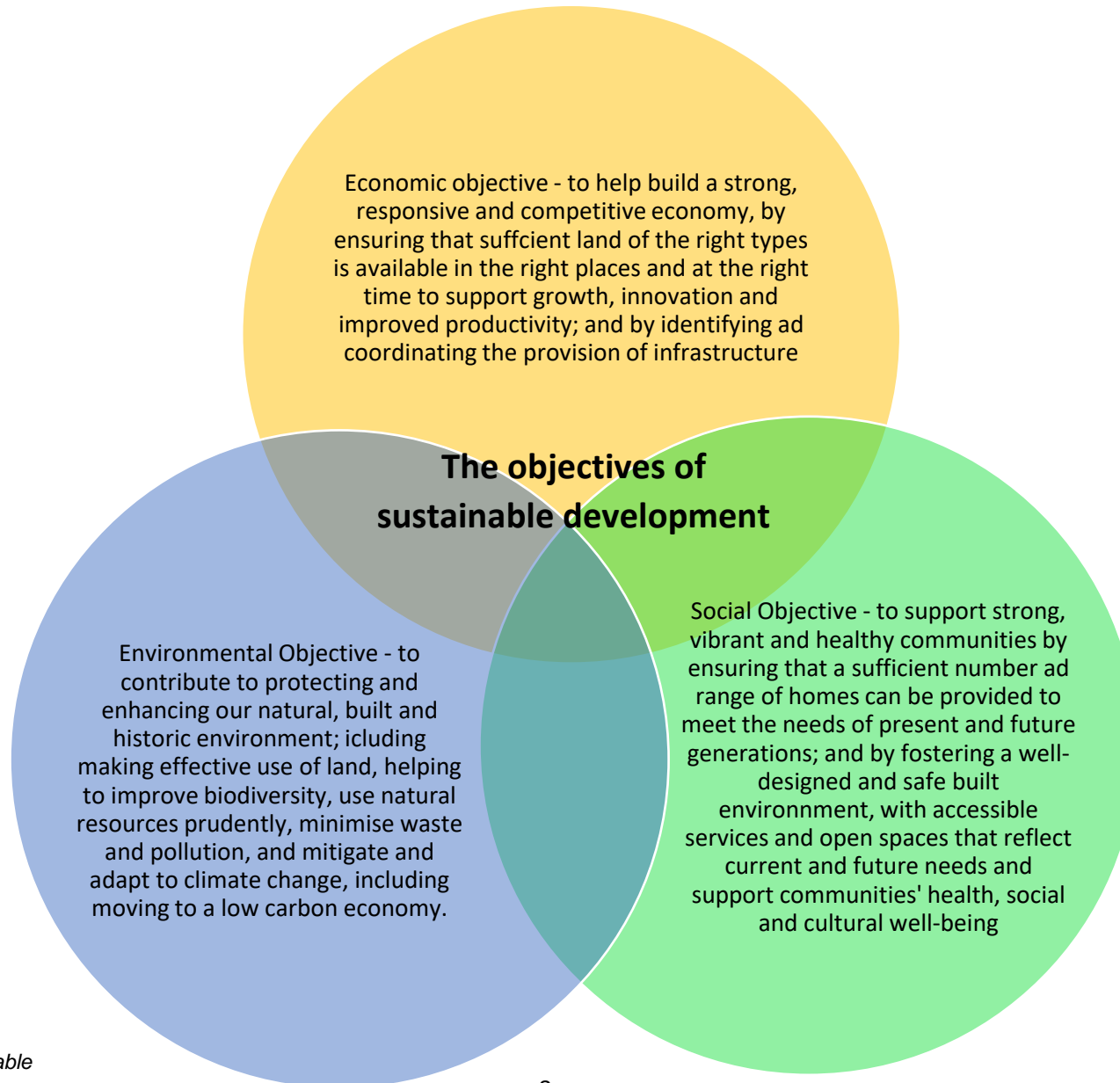


Figure 1: The objectives of Sustainable Development

What is an Integrated Impact Assessment?

- 1.8. An Integrated Impact Assessment (IIA) brings together the Sustainability Appraisal (SA), Strategic Environmental Appraisal (SEA), Health Impact Assessment (HIA) and Equality Analysis (EA) into a single framework. Each of these assessments/ appraisals are explained in greater detail below.

Sustainability (SA) and Strategic Environmental Assessment (SEA)

- 1.9. A SA is an iterative process that must be carried out during the preparation of a Local Plan, and is a statutory requirement as set out in Section 19 of the Planning and Compulsory Purchase Act 2004. Its purpose is to promote sustainable development. It seeks to ensure better integration of sustainability considerations into Local Plans. SAs consider the implication of the Local Plan for a social, economic and environmental perspective. They require the assessment of options against available baseline data and sustainability objectives. SAs also assess how the plan will contribute to the achievement of sustainable development.
- 1.10. As advised in the National Planning Practice Guidance (NPPG), SAs should incorporate a Strategic Environmental Assessment (SEA). This is European Directive 2001/42/EC requirement was transposed directly into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the Strategic Environmental Assessment Regulations). A SEA assesses the effects of certain plans and programmes on the environment.

Health Impact Assessment (HIA)

- 1.11. The role the built and natural environment, together with social and economic circumstances, plays in shaping health is increasingly recognised. A health impact assessment (HIA) identifies ways to maximise impacts for health gain, and minimise risks. Although undertaking a HIA is not compulsory, the Council will integrate this process through the IIA Framework. The IIA will expand the 'human health' topic of the SEA to ensure that relevant baseline data, key sustainability issues and opportunities, objectives and mitigation measures are identified.

Equalities Assessment (EA)

- 1.12. Section 149(1) of 'The Equality Act 2010' places a requirement on public organisations, and those who deliver public functions, to show due regard to the need to:
- Eliminate unlawful discrimination, harassment, and victimisation

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

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

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

Habitats Regulation Assessment

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

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

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

1.17. Within Brent there are no internationally designated SACs, SPAs or Ramsar sites (wetlands of International Importance). Five European Sites (which are listed in Table 1) are identified within 15km of Brent's boundaries. Initial HRA Screening concluded that "the emerging Brent Local Plan **is not likely to have significant effects** on the qualifying features and integrity of the identified European sites". A further screening assessment, which is contained within Appendix 3, has been

undertaken to determine whether the preferred approach is likely to have a significant effect on the identified European sites. The screening assessment will be submitted to Natural England for approval.

European Site	Conservation Status	Distance from Brent
Richmond Park	Special Area of Conservation	8km
Wimbledon Common	Special Area of Conservation	9km
Lee Valley	Special Protection Area	11km
South West London Water Bodies	Special Protection Area	15km
Epping Forest	Special Area of Conservation	15km

Table 1: European Sites identified within the Screening Assessment

The Spatial Scope

1.18. The IIA will cover the areas that fall within the administrative boundaries of the London Borough of Brent, where Brent is the Local Planning Authority (Figure 2). The shaded area falls within the administrative boundaries of the OPDC. As shown in Figure 3, Brent is adjoined by seven different London boroughs. Where appropriate, the IIA will consider the potential impact beyond Brent's Local Planning Authority boundary.

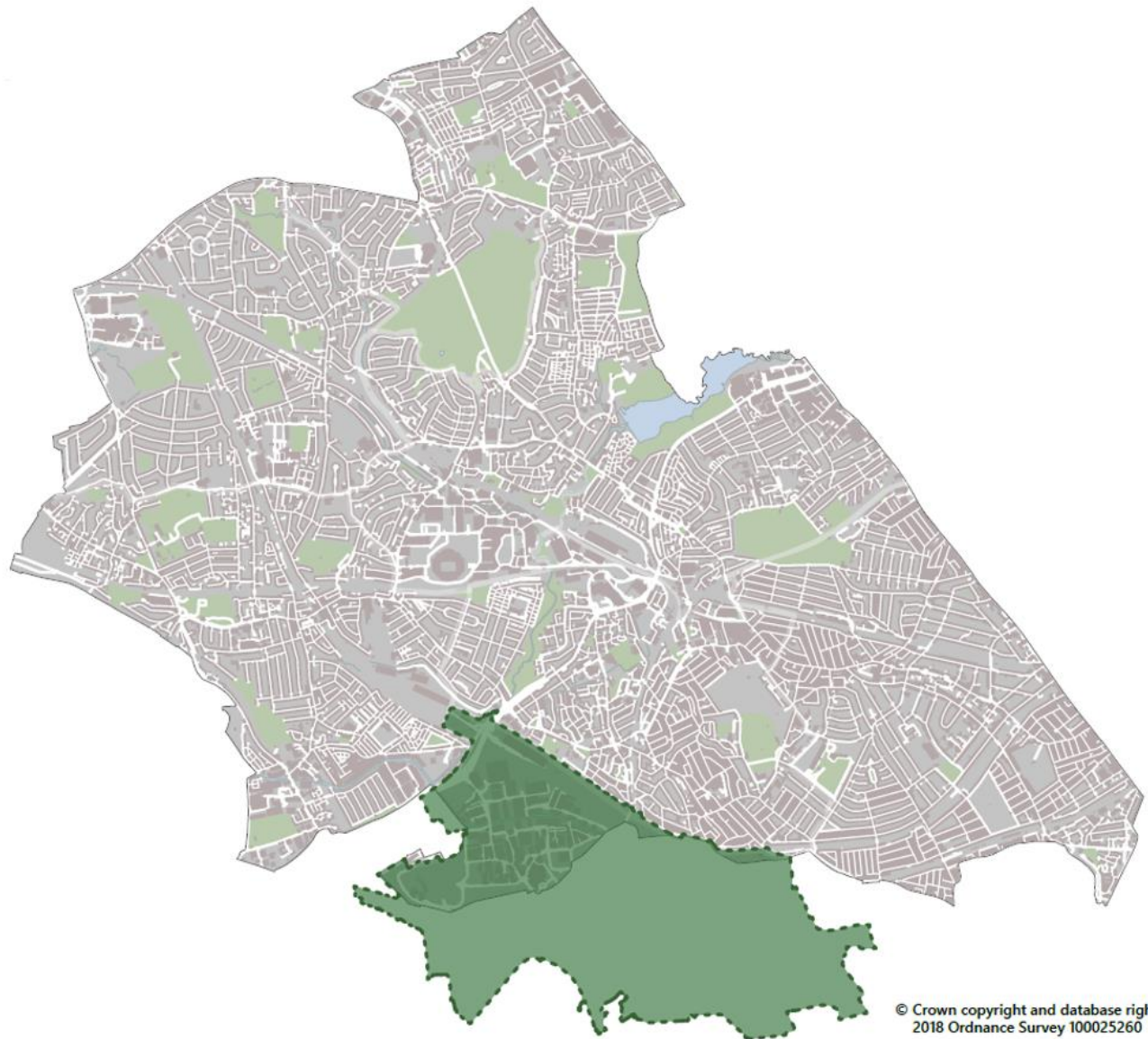


Figure 2: London Borough of Brent Administrative Boundary

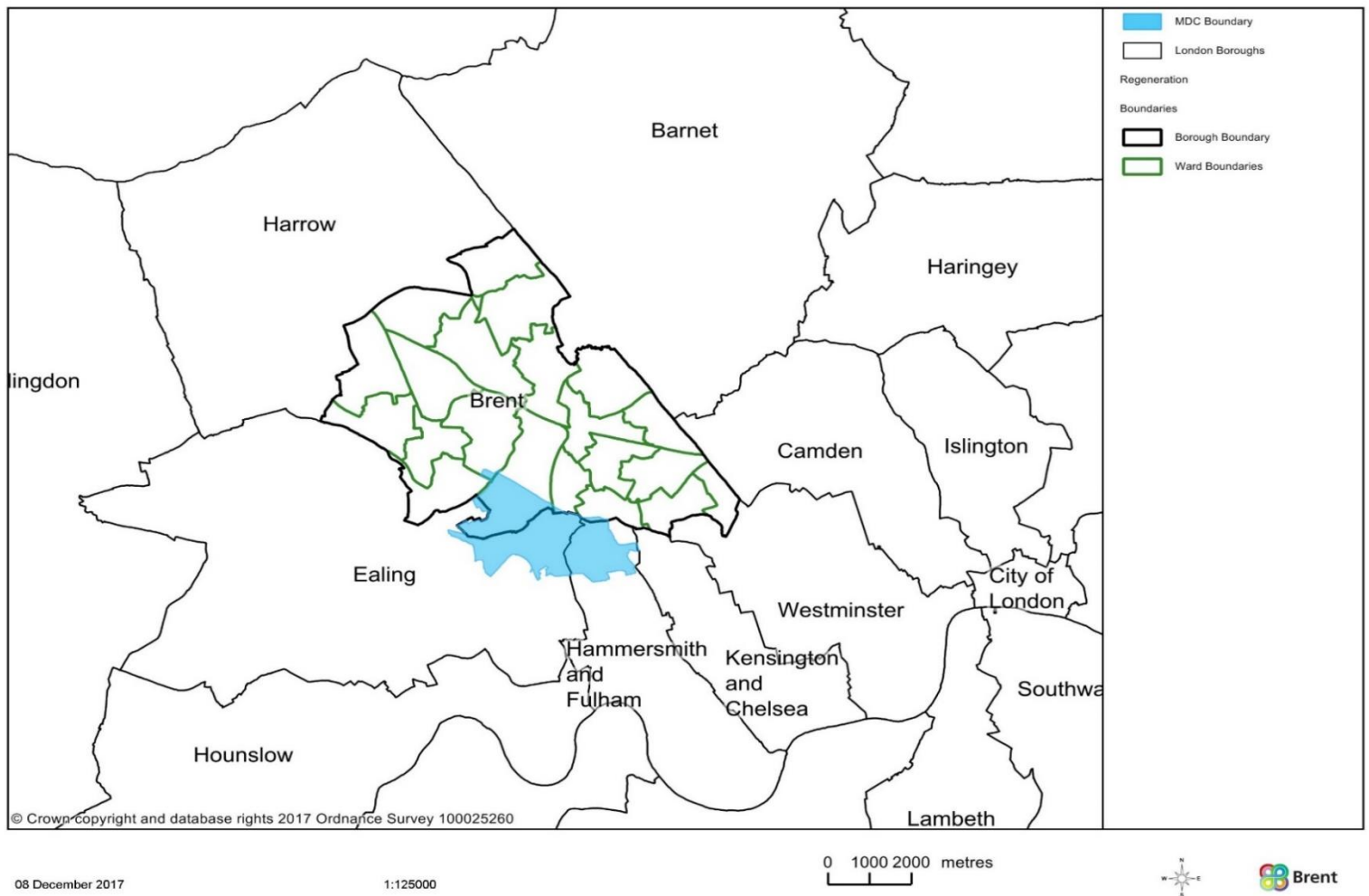


Figure 3: Brent and neighbouring authorities

2. Brent's Local Plan

2.1. Brent Council is currently in the process of taking forward a new Local Plan. Once adopted, it will replace the current Local Plan (with the exception of the Waste Plan). It provides the Council's vision, objectives, and policies and proposals for meeting social, economic and environmental development aims for the borough to 2041.

Brent's Current Local Plan

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

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

Development Management Policies (2016)

2.3. The Development Management Policies DPD sets out detailed policies that, in conjunction with the National Planning Policy Framework, the London Plan and the Brent Core Strategy, are used to determine planning applications for development in the borough. This document completed the Brent Local Plan, and replaced the saved Unitary Development Plan policies. A Sustainability Appraisal was carried out on it. This concluded that "*Overall the policies are predicted to have positive effects. The policies score almost exclusively positive against the social and economic objectives, however, there are some mixed effects predicted in relation to some environmental objectives*". Most of the policies in this document will be taken forward in an amended form within the draft Brent Local Plan to take account of changes in circumstance/ understanding of how they have performed.

Wembley Area Action Plan (2015)

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

Joint West London Waste Plan (2015)

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

Site Specific Allocations (2011)

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

Core Strategy (2010)

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

3. Methodology

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- 3.1. The preparation of the 'Brent Local Plan – Integrated Impact Assessment – Scoping Report' was the first stage of the IIA process for the Brent Local Plan. The draft Scoping Report was out for consultation in February/March 2018. Comments received during the consultation period have been reflected within this draft report. The Scoping Report:
- Set out the policy context for the IIA review;
 - Established the baseline data within a number of areas, including housing, population, education and climate change;
 - Identified key sustainability issues within the London Borough of Brent;
 - Developed the IIA framework, which consists of 24 sustainability objectives that would be used to appraise the policies and proposals contained within the draft Local Plan

Stage B: Developing and Refining

- 3.2. During this stage, the emerging Local Plan and its policies are assessed against the IIA framework identified within the scoping report, and repeated again in Table 2. As required by the SEA directive, this IIA report also identifies, and evaluates the reasonable alternatives identified for a number of sustainability issues. Where no reasonable alternatives could be identified, an assessment based on 'Relying on the London Plan Policies' has been applied.
- 3.3. The results of the Council's assessment on the preferred options, and their reasonable alternatives are presented in a series of matrices. The matrices include the following details:
- A score, using the scoring in Table 3, that the policy achieves against each IIA objective;
 - A commentary on the likely effects that the policies and reasonable alternatives; and
 - Where appropriate, recommendations for 'mitigation and enhancement'
- 3.4. The emerging Local Plan vision and objectives have also been assessed to ensure their compatibility with the IIA objectives identified in Table 2. Accompanying each IIA objective is a set of guide questions, which will be used to assess whether the policies/reasonable alternative will help to achieve the objective, or whether it is in conflict with it.

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
Social			
<p>Encouraging prosperity, and reducing inequalities and social exclusion</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"> • Will the policy/project reduce poverty and social exclusion in those areas most affected? • Will it improve affordability of essential services? • Will it promote social cohesion and integration? • Will it have a positive impact on reducing fuel poverty/ associated deaths? • Does it remove or reduce disadvantages suffered by people due to their protected characteristics? 	<ul style="list-style-type: none"> • The borough's ranking on the Indices of multiple deprivations (IMD) • Number of households in fuel poverty • % of children in income deprived households 	<p>Reduce the area of the Borough within the lowest 20% IMD category from 2019 levels</p>
<p>Health and Well-being</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"> • Does it protect and enhance access to the provision of health care/community/open space/leisure facilities? • Will it reduce death rates? • Will it promote physical activity or increase participation in sport and leisure activities for all low participation groups? 	<ul style="list-style-type: none"> • Levels of obesity within the borough • Open Space deficient areas • Life expectancy – borough wide and at ward level • % of population participating in 30 minutes of moderate intensity sport • Healthy Street Scores • Mortality Rate 	<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> <p>Increase in the percentage of the borough's population that are considered to be 'Active'.</p>

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<ul style="list-style-type: none"> • Will it promote opportunities for better food choices? • Will it enhance mental well-being through a safer, more stimulating and pleasant natural and built environment? • Will it reduce health inequalities? • Does it affect specific sub-groups disproportionately compared with the whole population? 	<ul style="list-style-type: none"> • Number of patients registered at GP surgery • Number of FTE GPs within Brent • Proportion of the borough deficient in relation to local sport facilities 	
<p>Housing</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"> • Will it increase access to good quality and affordable housing? • Will it encourage mixed use and range of housing tenure types to meet the varied and in some cases specialist needs of the population? • Will it reduce the number of unfit homes? • Will it reduce homelessness/ people living in temporary accommodation? 	<ul style="list-style-type: none"> • Net additional dwellings during financial year • Number and % of housing completions that were affordable during financial year • Number of specialist accommodation homes built during financial year • Proportion of family sized (3+ beds) homes • Proportion of homes split by different tenures within the Census 	<ul style="list-style-type: none"> • 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. • Originally, the new draft London Plan indicated that

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

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<ul style="list-style-type: none"> • Will it reduce actual noise levels? • Will it reduce noise concerns? 		
<p>Crime and Preventing and Community Safety</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"> • Will it reduce actual levels of crime? • Will it reduce the fear of crime? • Will it reduce actual and perceived threats to personal safety for example from fire or terrorism? 	<ul style="list-style-type: none"> • Number of notifiable offences during financial year • Anti-social behaviour cases open during financial year • Brent Crime rate • Number of gangs within the borough • % of population who feel safe walking outside after dark 	
<p>Community Identity</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"> • Will it meet or, if subject to change, have the potential to meet a specific diversity need that is not currently catered for in the borough? • Will it foster a sense of pride in area? • Will it increase the ability of people to influence decisions? • Will it improve ethnic relations? 	<ul style="list-style-type: none"> • Number of community facilities within the borough 	

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

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
<p>Traffic</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"> • Will it reduce the need to travel? • Will it reduce traffic volumes? • Will it increase the proportion of journeys using modes other than the car? • Will it encourage walking and cycling? 	<ul style="list-style-type: none"> • Modal share • Proportion of new homes and other floorspace within areas of PTAL scores of 4 or more • Vehicle km travelled by mode each year • PTAL levels • Km of cycle and walking routes within the borough • Car Parking Spaces created during financial year • Proportion of underground/over ground stations with step free access. 	<ul style="list-style-type: none"> • Increase modal share of walking to 30% by 2021/22 • Increase modal share of cycling to 3% by 2021
<p>Waste Management</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"> • Will it minimise the production of waste and use of non-renewable materials? • Will it promote recycling? • Where reuse or recycling is not possible will it encourage potential for energy from waste to minimise volumes of land-fill? 	<ul style="list-style-type: none"> • Recycling and composting rates • Amount of waste collected during financial year 	<ul style="list-style-type: none"> • The new draft London Plan (2019) (Intend to Publish) contains the following figures for projected waste arising: • 2021 – household, commercial and industrial waste – 259,000 tonnes • 2041 – household, commercial and industrial waste – 274,000 tonnes

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
<p>Water Quality and Resources</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"> • Will it improve the quality of inland water? • Will it reduce water consumption? • Will it reduce combined sewer overflow events? 	<ul style="list-style-type: none"> • Water Consumption Levels • Water Quality Levels • WFD status of waterbodies in the borough 	<ul style="list-style-type: none"> • All water bodies to achieve a 'good' status by 2027
<p>Environmental Health</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"> • Will it improve air quality? • Will it reduce noise pollution? • Will it reduce light pollution? • Will it help to achieve the objectives of the Air Quality Management Plan? • Will it reduce emissions of key pollutants? 	<ul style="list-style-type: none"> • Amount of contaminated land remediated • Status of water bodies within the borough • % of borough within AQMA • Noise levels within the borough 	
<p>Biodiversity</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"> • Will it conserve and enhance habitats of borough or local importance and create habitats in areas of deficiency? • Will it promote naturalisation and enhancement of rivers? 	<ul style="list-style-type: none"> • Number of SINCs within the borough • Changes in the areas and populations of biodiversity importance • Status of water bodies within the borough • Number of TPOs created during financial year 	<ul style="list-style-type: none"> • All water bodies to achieve a 'good' status by 2027 • Development schemes within the borough achieve a net gain for biodiversity

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

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

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

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

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

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

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

Table 2: IIA Framework

Symbol	Likely effect against the IIA objectives	Description of effect
++	Significant Positive	<p>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.</p> <p>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.</p>

+	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 3: Scoring for the IIA

- 3.5. In addition to the appraisal of policies and reasonable alternatives, the Council also assessed emerging site allocations. Site allocations contained within the Plan were identified through a number of different means, which includes: public consultation, reviewing growth areas, undertaking a Strategic Housing and Land Availability Assessment (SHLAA), and pre-application discussions.

3.6. To appraise the site allocations contained within the emerging Local Plan, select sustainability criteria were identified. Like in the IIA appraisal of the preferred policy approach and reasonable alternatives, social, economic and environmental factors, and the impact that the proposed development would have on these were appraised. However, some factors relevant to appraisal of the preferred policy approach and reasonable alternatives were not considered to be applicable to all site allocations. The matrix that was used to assess site allocations is identified below.

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects ?	Minor Negative -	Significant Negative --
S1a: Area is within a London Strategic Area for Regeneration.	Site of 1 hectare or more within a London Strategic Area for Regeneration	Site of less than 1 hectare within a London Strategic Area for Regeneration	Site boundary within 100 metres of a London Strategic Area for Regeneration	NA	Site boundary 100 metres or more from a London Strategic Area for Regeneration	NA
S2a: Walking distance to healthcare facilities.	NA	Within 800m of a healthcare facility	NA	NA	More than 800m from a healthcare facility	NA
S2b: Walking distance to open space and sports facilities.	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
S3a: Housing Provision Assessment.	100+ homes	10-99homes	9 or fewer homes gained or lost/potential displaced	NA	10-99 homes lost/potential displaced	100+ homes lost/potential displaced
Crime and Preventing and Community Safety	Area currently associated with high levels of crime		Area currently associated with average levels of crime related to		Area currently associated with low levels of crime	

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects ?	Minor Negative -	Significant Negative --
	related to layout/ uses/ social mix		layout/ uses/ social mix		related to layout/ uses/ social mix	
S7a: Walking Distance to Services and Facilities.	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 an employment area
S7b: Walking distance to schools.	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
EN1a: PTAL Score of Site taking account of known public transport improvements.	PTAL, 6a & 6b	PTAL 5,4	PTAL 3		PTAL 2	PTAL 1, 0
EN2a: Avoiding conflicts with waste management sites.	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
EN3a	NA	Opportunity to enhance setting of watercourse/	All other sites			

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects ?	Minor Negative -	Significant Negative --
		provide better access/ naturalisation				
EN4a: Exposure to low air quality or noise.			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
EN4b: Contribution to road traffic increases within AQMAs.	NA	NA	All sites, within PTAL 4-6		All sites, within PTAL 3	All sites within PTAL 0-2
EN4c: Within an area of contaminated land.	NA	Not within an area of contaminated land	NA	Within an area of contaminated land	NA	NA
EN5a: Within an area of recognised ecological value.			Not within a recognised area of ecological value		Within London level ecological value designation	Within national level ecological value designation
EN7a: Qualitative Assessment of Potential Impact on Heritage/ Cultural Significance.			Not designated.	Carried out by Council's conservation officer.		
EN11a Presence of brownfield land, derelict	Redevelopment of derelict and/ or disused brownfield site	Redevelopment of brownfield site currently in use but	Redevelopment of brownfield land that is in use but does not have any poor	NA	Loss of greenfield land that is not designated as open space	Loss of all or part of designated open space

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects ?	Minor Negative -	Significant Negative --
buildings, and open space.		creating a poor environment	environment issues NA			
EN12a: Flood Risk From Rivers.	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
EN12b: Flood Risk from Ground Water.	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
EN12c: Flood Risk from Surface Water.	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
EC2a: Employment Floorspace Change	> +4,500 sq.m. gain	< 4,500 sq.m. and > 1000 sq.m. gain	< 1000 sq.m. gain and < - 1000 sq.m.loss	NA	>-1000 sq.m. and <-4500 sq.m. loss	>-4,500 sq.m. loss

Table 4: Matrix for Assessing Site Allocations

Stage C: Preparing the IIA Report

3.7. This report details the process that has been undertaken to date in carrying out the IIA of the Brent Local Plan. It contains five main parts, which include:

- A Non-Technical Summary – provides a summary of the key findings and recommendations of the Integrated Impact Assessment, avoiding where possible technical language;
- Sustainability Context - provides baseline information for the Local Plan and identifies plans, programmes and policies that can impact/assist the delivery of the Brent Local Plan;
- Appraisal of preferred policies and reasonable alternatives – this section presents the findings of the alternatives and preferred options;
- Appraisal of site allocations - this section presents the findings of the assessment of site allocations;
- Appendices – contains information which support the IIA report and its findings.

Stage D: Consulting on the Final Proposals (Publication) document and IIA Report

3.8. The Council consulted on the Final Proposals (Publication) document and IIA report from 24 October to 5 December 2019. Comments received in relation to this stage informed modifications to the Local Plan which need to be considered in a revised IIA. In line with SEA requirements and national legislation, the Council directly consulted the following stakeholders: Historic England, Environment Agency and Natural England.

3.9. Following the Publication Stage of consultation, comments received from the Environment Agency resulted in the methodologies of EN12a, EN12b and EN12c being amended. The amended methodologies for these objectives (and respective site allocation assessments) can be found below. The resulting updated site allocation assessments are in Chapter 9.

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects	Minor Negative -	Significant Negative --
EN12a: Flood Risk From Rivers.	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

EN12b: Flood Risk from Ground Water.	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 or smaller proportion (1-50%) within 'high' or 'very high' groundwater flood risk area	Majority (>50%) within 'high' or 'very high' groundwater flood risk area
EN12c: Flood Risk from Surface Water.	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

Table 5: Updated Matrix for Assessing Flood Risk of Site Allocations

Further Stages

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

4. Sustainability Context

Relevant Plans, Policies and Programmes

- 4.1. As identified in the IIA Scoping Report, other strategies, plans and programmes can have an influence in the Brent Local Plan. In addition, Schedule 2 of the SEA regulations requires SEA's to:
- Outline the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes; and
 - Identify the environmental protection objectives, established international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.
- 4.2. The Scoping Report contained a comprehensive review of policies, plans, programmes and strategies that were considered to be relevant and influential on the Brent Local Plan. These plan, programmes and policies together with subsequent amendments, or additions since the scoping report was issued have been summarised in Table 6. More information about the plans, programmes and policies identified below is contained within Appendix 2.
- 4.3. It should be noted that since the publication of the Scoping Report, the National Planning Policy Framework has been updated. The revised NPPF places a greater focus on housing delivery, and should be used as a tool to ensure that there is planning for the right homes, at the right places and of the right quality, but at the same time protecting the environment.
- 4.4. Furthermore, the new draft London Plan has been through examination. Since the Publication stage of the Brent Local Plan consultation, the Mayor of London has confirmed that he will accept the panel of Inspectors' recommendation for local authorities' housing targets to be reduced. This means that Brent's housing target in the new London Plan has been reduced from 2915 per annum to 2325 per annum.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
Overarching	<ul style="list-style-type: none"> • European Directive 2001/42/EC • National Planning Policy Framework, Department for Communities and Local Government, 2019 	Sets out the overarching planning framework for sustainable growth. The overarching themes present in

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	<ul style="list-style-type: none"> • The London Plan, GLA, 2016 • The draft London Plan (Intend to Publish), GLA, 2019 • Brent Borough Plan 2019-2023, Brent Council • Brent Inclusive Growth Strategy, 2019-2040, November 2019 • The UK Government Sustainable Development Strategy, 2005 	this document is applicable to all objectives.
Economic		
Employment	<ul style="list-style-type: none"> • Industrial Strategy White Paper, HM Government, November 2017 • The Culture White Paper, DCMS, March 2016 • The Mayor's Economic Development Strategy for London, GLA, December 2018 • A City for All Londoners, GLA, October 2016 • Culture and night-time economy SPG, GLA, November 2017 • Culture for All Londoners – Mayor of London's Culture Strategy, GLA, 2018 • Town Centres SPG, GLA, July 2014 • Land for Industry and Transport SPG, GLA, September 2012 • London Office Policy Review, GLA, 2017 • London 2036: An Agenda for Jobs and Growth, LEP & London First, 2015 • A Regeneration Strategy for Brent 2010-2030, Brent Council • Employment, skills and enterprise strategy 2015-20, Brent Council 	Promote sustainable economic development and a range of employment opportunities.
Education & Skills	<ul style="list-style-type: none"> • The Children Act 2004 • Policy statement: Planning for schools' development, Department for Communities and Local Government, August 2011 (supersedes the Statement of 26th July 2010) • Education Act 2011 • DfE strategy 2015 to 2020: world-class education and care, Department for Education, March 2016 • The Mayor's Economic Development Strategy for London, GLA, December 2018 	<p>Seeks to improve educational attainment through the provision and access to good quality education.</p> <p>Seeks to improve training opportunities</p>

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	<ul style="list-style-type: none"> • Culture for All Londoners – Mayor of London’s Culture Strategy, GLA, 2018 • International Education Strategy: global potential, global growth, Department for Education, Department for International Trade, March 2019 • Employment, Skills and Enterprise Strategy 2015-20, Brent Council • London Borough of Brent School Place Planning Strategy 2019-2023, Brent Council, November 2018 	
Efficient Infrastructure	<ul style="list-style-type: none"> • Mayor’s Transport Strategy, GLA, 2018 • The Mayor’s Economic Development Strategy for London, GLA, December 2018 • London Infrastructure Plan 2050, GLA, March 2015 	<p>Promotes the prioritisation of space-efficient modes of transport which will help to tackle congestion and improve the efficient of the street for essential traffic</p> <p>Supports healthy streets approach and plans for growth, both housing and economic, around the transport network</p>
Growth and Regeneration	<ul style="list-style-type: none"> • The Mayor’s Economic Development Strategy for London, GLA, December 2018 • Estate Regeneration National Strategy, December 2016, DCLG • London 2036: An Agenda for Jobs and Growth, LEP & London First, 2015 • A Regeneration Strategy for Brent 2010-2030, Brent Council 	Promotes sustainable growth and regeneration
Social		
Prosperity, Inequalities and Social Inclusion	<ul style="list-style-type: none"> • Equality Act 2010 • Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015 	Seeks to create an equal society, which recognises people’s different needs and provides fair opportunities for all.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	<ul style="list-style-type: none"> • Draft Guidance on Housing Needs for Caravans and Houseboats, March 2016, DCLG • Housing White Paper; fixing our Broken Housing Market, Department for Communities and Local Government, February 2017 • A City for All Londoners, GLA, October 2016 • Social Infrastructure SPG, GLA, May 2015 • Shaping Neighbourhood Accessible London; Achieving an Inclusive Environment, GLA, October 2014 • Culture for all Londoners: Mayor of London’s Culture Strategy, GLA, December 2018 • Cultural Metropolis: Achievements and Next Steps, GLA, 2014 • Culture and the night-time economy SPG, GLA, November 2017 • Play and Informal Recreation SPG, GLA, September 2012 • Town Centres SPG, GLA, July 2014 • Homes for Londoners – Affordable Housing and Viability SPG, GLA August 2017 • Housing SPG, GLA, updated August 2017 • Planning for Equality & Diversity in London, GLA, October 2007 • Inclusive London: The Mayor’s Equality, Diversity and Inclusion Strategy, GLA, May 2018 • Financial Inclusion Strategy, Brent Council, September 2015 • A Regeneration Strategy for Brent 2010-2030, Brent Council • Stronger Communities Strategy 2019-2023, Brent Council • Safer Brent Community Safety Strategy 2018-2021, Brent Council • Safer Brent Partnership Community Safety 2018-2019 Annual Report, Brent Council • Brent Equality Strategy, 2019-2023 	<p>Seeks to remove barriers which limit what people can and cannot do.</p>
Health and wellbeing	<ul style="list-style-type: none"> • Health for Growth 2014-2020, European Commission, 2011 • The Children Act, 2004 	<p>Seeks to improve health and well-being</p>

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	<ul style="list-style-type: none"> • White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011 • Planning for Sport Aims and Objectives, Sport England, July 2017 • Playing Fields Policy and Guidance, Sport England, March 2018 • Play and Informal Recreation SPG, GLA, September 2012 • The London Health Inequalities Strategy, GLA, September 2018 • The Mayor’s Food Strategy GLA December 2018 • Healthy Streets for London – Prioritising walking, cycling and public transport to create a healthy city, GLA, February 2017 • NW London Sustainability and Transformation Plan – Our Plan for North West Londoner to be well and live well, NW London STP System, October 2016 • Brent Health and Wellbeing Strategy 2014-17, Brent Council and NHS Brent • Planning for Sports and Active Recreation Facilities Strategy 2008-2021, Brent Council and Sport England, 2007 • Food for Thought – A Food Growing and Allotment Strategy for the London Borough of Brent and Associated Action Plans, Brent Council • Fit for Life – A Physical Activity Strategy for Brent, 2016-2021, Brent Council 	<p>Promotes greater levels of physical activity</p> <p>Support innovative solutions to improve healthcare provision.</p> <p>To reduce health inequalities</p>
Housing	<ul style="list-style-type: none"> • Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015 • Estate Regeneration National Strategy, December 2016, DCLG • Housing White Paper; fixing our Broken Housing Market, Department for Communities and Local Government, February 2017 • Planning and Affordable Housing for Build to Rent, February 2017, DCLG • The 2017 London Strategic Housing Market Assessment, GLA, November 2017 	<p>Seeks the creation of a mixed and balanced community by meeting the housing requirements of the whole community, including those in need of affordable and specialist housing</p>

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	<ul style="list-style-type: none"> • The London Strategic Housing Land Availability Assessment 2017, GLA, November 2017 • Assessing Future Potential Demand for Older Persons Housing, Care Homes and Dementia Housing in London, Three Dragons (on behalf of the GLA), November 2017 • A City for All Londoners, GLA, October 2016 • Homes for Londoners – Affordable Housing and Viability SPG, GLA, August 2017 • Housing SPG, GLA, updated August 2017 • London Housing Strategy, May 2018, GLA • Town Centres SPG, GLA, July 2014 • Draft Housing Strategy, 2017 -2022, Brent Council • A regeneration strategy for Brent 2010-2030, Brent Council • West London Strategic Housing Market Assessment October 2018 • Brent Strategic Housing Market Assessment Update October 2018 	
Quality of Surroundings	<ul style="list-style-type: none"> • European Landscape Convention 2000 • Sustainable Design & Construction SPG, GLA, April 2014 • Town Centres SPG, GLA, July 2014 • Play and Informal Recreation SPG, GLA, September 2012 • All London Green Grid, GLA, March 2012 • All London Green Grid SPG, March 2012 • ALGG Area Frameworks • Healthy Streets for London – prioritising walking, cycling and public transport to create a health city, GLA 	Maintain and enhance the quality of the environment

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
Community Identity	<ul style="list-style-type: none"> • Equality Act 2010 • Culture for all Londoners – Mayor of London’s Culture Strategy, GLA, December 2018 • Culture and the Night Time Economy SPG, GLA, November 2017 • Social Infrastructure SPG, GLA, May 2015 • Brent Equality Strategy 2019-2023, Brent Council, 2019 • Inclusive London – The Mayor’s Equality, Diversity and Inclusion Strategy, GLA, May 2018 	<p>Advance equality of opportunity, eliminate discrimination, and foster good relations.</p> <p>Maximise the contribution the art, culture and heritage facilities can make to the community</p> <p>Creating a positive community identity</p>
Accessibility	<ul style="list-style-type: none"> • Accessible London; Achieving an Inclusive Environment, GLA, October 2014 • Town Centres SPG, GLA, July 2014 	<p>Enhancing accessibility for all</p>
Crime Prevention and Community Safety	<ul style="list-style-type: none"> • Secure by Design Homes 2019 • Safer Brent Partnership Community Safety Strategy Annual Report 2018-2019 • Stronger Communities Strategy 2019-2023, Brent Council 	<p>Identifying a sophisticated and modern approach that will through the improvement of data and technology will see a reduction in crime.</p> <p>Reducing the fear of crime</p>
Environment		
Traffic	<ul style="list-style-type: none"> • West London Sub Regional Transport Plan, Transport for London, 2016 update • Mayor’s Transport Strategy 2018 • Brent’s Parking Strategy 2015, Brent Council • Bent’s Walking Strategy 2017-2022, Brent Council • Brent’s Cycling Strategy 2016 – 2021, Brent Council • Brent’s Long-term Transport Strategy 2015-2035, Brent Council 	<p>Promote the use of sustainable modes of transport over private vehicle use.</p> <p>Promote the efficient use of the transport system</p>

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	<ul style="list-style-type: none"> • Healthy Streets for London – prioritising walking, cycling and public transport to create a health city, February 2017, GLA 	
Water Quality & Resources	<ul style="list-style-type: none"> • Water Framework Directive 2000/60/EC • Urban Waste Water Treatment Directive 91/271/EEC • Future Water: The Government’s Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011 • Written Ministerial Statement: Sustainable Drainage Systems, December 2014 • Review individual flood risk assessments: standing advice for local planning authorities, EDRA & EA, updated March 2019 • National Flood Resilience Review, September 2016, HM Government • London Sustainable Drainage Action Plan, October 2015, GLA • Sustainable Design & Construction SPG, GLA, April 2014 • Securing London’s Water Future, GLA, October 2011 • Part 1: Thames Basin District River Basin Management Plan, DEFRA, 2015 • Part 2: River basin management planning overview and additional information, DEFRA, 2016 • The London Rivers Action Plan and UK Projects Map, The River Restoration Centre, January 2009 • Brent River Corridor Improvement Plan, Brent River Catchment Partnership, 2014 • London Environment Strategy, GLA, May 2018 	Improve water quality, address flooding and water scarcity.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
Environmental Health	<ul style="list-style-type: none"> • EU Directive on Ambient Air Quality and Management 96/62/EC • UK Clean Air Strategy, Department for Environment, Food and Rural Affairs, 2019 • UK plan for tackling roadside nitrogen dioxide concentrations – an overview, Department for Environment Food and Rural Affairs, Department for Transport, July 2017 • UK Detailed Air Quality Plan, July 2017, DEFRA, DfT • Sustainable Design & Construction SPG, GLA, April 2014 • The Control of Dust and Emissions during Construction and Demolition SPG, GLA, July 2014 • Clearing the air: The Mayor’s Air Quality Strategy, GLA, December 2010 • New Proposals to Improve Air Quality, October 2016, GLA/TfL • Brent’s Air Quality Action Plan 2017-2022, Brent Council • European Directive: Environmental Noise Directive 2002/49/EC • Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010 • Sounder City: The Mayor’s Ambient Noise Strategy, GLA, March 2004 	<p>Improving air quality through reducing exposure to PM_{2.5} and nitrogen dioxide, tackling sources of air pollution</p> <p>Prevent and reduce environmental noise and preserve quiet areas</p>
Biodiversity	<ul style="list-style-type: none"> • European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats (<i>The Habitats Directive</i>) • Wildlife and Countryside Act 1981 • Natural Environment White Paper, DEFRA, June 2011 • 25 Year Environment Plan DEFRA January 2018 • UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012 • Green Infrastructure and Open Environments: London’s Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, GLA and London Geodiversity Partnership, March 2012 	<p>Enhance and protect biodiversity, and improve access to nature.</p> <p>Promote naturalisation.</p> <p>Addressing a number of areas which impact London’s environment</p>

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	<ul style="list-style-type: none"> • Improving Londoners Access to Nature: London Plan Implementation Report, GLA, February 2008 • Green Infrastructure and Open Environments: Preparing Borough Tree and Woodland Strategies, GLA, February 2013 • London Biodiversity Action Plan, London Biodiversity Partnership, 2001 • London Environment Strategy, GLA, 2018 • Food for Thought – A Food Growing and Allotment Strategy for the London Borough of Brent and associated Action Plans, Brent Council • Brent Biodiversity Action Plan 2007, Brent Council • London Environment Strategy, GLA, May 2018 	
Open Space	<ul style="list-style-type: none"> • All London Green Grid, GLA, March 2012 • All London Green Grid SPG, March 2012 • ALGG Area Frameworks • Play and Informal Recreation SPG, GLA, September 2012 • Food for Thought – A Food Growing and Allotment Strategy for the London Borough of Brent and associated Action Plans, Brent Council • Brent Parks Strategy 2010-2015, Brent Council 	<p>Promotes the protection and enhancement of open spaces</p> <p>Recognises the importance of open spaces and their contribution to improving quality of life</p>
Landscape & Townscape	<ul style="list-style-type: none"> • European Landscape Convention 2000 • All London Green Grid, GLA, March 2012 • All London Green Grid SPG, March 2012 • All London Green Grid Area Frameworks • London View Management Framework SPG, GLA, March 2012 • Green Infrastructure and Open Environments: London's Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, GLA and London Geodiversity Partnership, March 2012 • Preparing Borough Tree and Woodland Strategies SPG, February 2013, GLA • Brent Parks Strategy 2010-2015, Brent Council 	<p>Promote the conservation and protection of appropriate landscape, townscapes and their settings.</p> <p>Recognises the importance of open spaces, sport and recreation and the contribution that these areas can make in improving quality of life.</p>
Historic Environment	<ul style="list-style-type: none"> • European Convention on the Protection of the Archaeological Heritage (revised), 1992 	<p>Promotes the achievement, preservation and enhancement of</p>

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
& Cultural Heritage	<ul style="list-style-type: none"> • Planning (Listed Building and Conservation Areas) Act 1990 • Ancient Monuments and Archaeological Areas Act 1979 • Land Contamination and Archaeology, Good Practice Guide, February 2017, Historic England • The Heritage Statement 2017, December 2017, DCM • The Setting of Heritage Assets Advice Note, December 2017, Historic England • Tall Buildings Advice Note, December 2015, Historic England • Brent Archaeological Priority Areas, Historic England • Translating Good Growth for London's Historic Environment, April 2017, Historic England • Historic England's Conservation Principles 	historic assets and archaeological heritage.
Flood Risk	<ul style="list-style-type: none"> • Flood Risk Management Strategy, Brent Council, 2018 • Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011 • Flood and Water Management Act 2010 	Seeks to reduce the impacts of flood risk Promotes mitigation measures against flood risk
Climate Change Adaption Climate Change Mitigation	<ul style="list-style-type: none"> • Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC • Flood and Water Management Act 2010 • Energy Act 2013 • Climate Change Act 2008 • UK Climate Change Programme 2006 • The UK Low Carbon Transition Plan, HM Government, July 2009 • The Carbon Plan, HM Government, December 2011 • UK Renewable Energy Strategy, HM Government, 2009 • Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011 	Promotes the move to a low carbon future through sustainable design. Promotes mitigating and adapting to climate change. Promotes the use of renewable energy and renewable technologies in appropriate locations.

IIA Objective	Relevant Plan, Policy or Programme	Overarching Theme(s)
	<ul style="list-style-type: none"> • Planning for climate change – A Guide for Local Authorities on Planning for Climate Change, TCPA & RTPI, December 2018 • Managing Risks and Increasing Resilience: The Mayor’s Climate Change Adaption Strategy, GLA, October 2011 • Sustainable Design & Construction SPG, GLA, April 2014 • London Environment Strategy, GLA, May 2018 • Flood Risk Management Strategy, Brent Council, 2018 • Climate Change Strategy, Brent Council 	Tackling climate change and reap the positive economic benefits that solutions can bring.
Waste Management	<ul style="list-style-type: none"> • Waste Framework Directive 2008/98/EC • National Planning Policy for Waste, October 2014 • London’s Waste Resource: The Mayor’s Municipal Waste Management Strategy, GLA, November 2011 • London Environment Strategy, GLA, May 2018 • Joint West London Waste Plan, 2015 	Prevention or reduction of waste and its harmfulness and the recovery of value from waste by means of recycling, re-use and reclamation.
Land & Soil	<ul style="list-style-type: none"> • Safeguarding our soils- A Strategy for England, Department for Environment, Food and Rural Affairs, 2009 • Environmental Protection Act 1990 • Hazardous Substances Technical Consultation, October 2014, DCLG 	<p>England’s soil is managed sustainability and degradation threats tackled successfully.</p> <p>Improve the quality of England soils and safeguard their ability to provide essential services for future generations</p>

Table 6: Relevant Plans, Policies and Programmes

Baseline Information

4.5. Annex I of the SEA directive requires that the ‘likely significant effects’ of policies on the existing environment to be assessed. Due to the Council adopting an IIA approach, the ‘likely significant effects’ of policies on existing social, economic, health and equalities baseline.

4.6. The IIA Scoping Report identified a range of social, economic and environmental baseline data for the borough. From this data, key sustainability issues, as summarised in Table 7, were derived.

4.7. It should be noted that the baseline information for the borough will change over time. Therefore, it will need to be monitored and revised as appropriate. Full baseline information for the borough is contained in Appendix 1.

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
Population and Equality	<ul style="list-style-type: none"> • Brent is the 7th largest London borough – home to an estimated 335,300 people as at 2019. • Brent’s population has grown significantly since 2001. High growth is predicted to continue with the population projected to grow by between 2019 and 2041 and by 23.7% by 2050 – from approximately 335,000 in 2018 to approximately 407,000 by 2050. • In 2017/18, 32,600 people moved in to Brent and 34,000 moved out – the 24th highest turnover rate in the UK • Brent is the 14th most densely populated area in the UK, with approximately 7,652 people per square kilometre • Brent has a birth rate of 14.2 births per 1000 population, just above the London (13.5) rate and well above the rate across England (11.2). However, rates have been declining in recent years (locally and nationally). 	<ul style="list-style-type: none"> • The significant increase in population will place additional pressure on Brent’s housing and infrastructure. The Local Plan should ensure that there is sufficient provision of housing and infrastructure that supports both existing and future population. • The Local Plan should be mindful of the borough’s ageing population, whom may require bespoke housing solutions and a different type of environment. • The projected increase in population will create an extra demand for educational establishments and recreational facilities, such as parks and leisure centres, inclusive of all age groups. • The wider population trend of an ageing population could place additional pressure on the borough’s infrastructure, particularly healthcare facilities. 	S1, S3, S6, S7

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<ul style="list-style-type: none"> • The increase in population is likely to change the age structure and ethnicity of the borough's residents <ul style="list-style-type: none"> ○ The current population structure shows that Brent has a young population with a median age of 35, 5 years below the UK average. ○ The number of residents aged 65 years and over is expected to almost double between 2019 and 2041 rising from 40,900 to 75,800, accounting for 41% of the total population growth. The child population is expected to grow far more slowly, growing by 12% in the same period. ○ The gender split in the population is 51% male and 49% female. The proportion of men is highest in the 20-39 age group, where they comprise 53-54% of the population. However, women make up a higher proportion of Brent's elderly population – 62% of those aged 85 and over are female. ○ The proportion of the population who are of working age is predicted to grow by 18% by 2041. ○ Brent is one of the most ethnically diverse boroughs in the UK, with BAME groups making up 65.5% of the 	<ul style="list-style-type: none"> • There is also a need for the Local Plan to seek to create attractive areas for young people and those looking to raise a family. • Brent has a diverse community and the plan will be need to mindful of the different needs of groups i.e. ensuring there is a range of religious facilities and different types of housing to suit the needs of the community. • The Plan will need to consider integration of communities. Developments should ensure that there is inclusive design to support the diverse population of the borough. The built environment should encourage community cohesion and reduce isolation. • Language could be a potential barrier that prevents some residents from engaging in the Local Plan process. 	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>population, with the Indian ethnic group making the highest proportion. It is likely that the increase in population will create changes in the ethnicity of the borough. It is forecasted that there will be an increase in 'Other White' and 'Other Asian' ethnic groups, with a decrease in the population 'White Irish' and 'Black Caribbean'.</p> <ul style="list-style-type: none"> ○ There are 149 languages currently being spoken in Brent, with English being the main language for 62.8% of the population. ○ Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day activities in some way. ○ Brent has relatively high birth rates – in 2017 there were 5208 live births, equating to the tenth highest fertility rate in England and Wales. ○ The 2011 census found that around 43% of Brent residents were married and 0.3% were in a civil partnership. ○ Statistics about the size of the LGB population vary considerably. However, the 2017 GP Patient Survey found that 4.6% of Brent residents surveyed 		

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>identified as Lesbian, Gay, Bisexual or “other”.</p> <ul style="list-style-type: none"> ○ The Government Equalities Office estimates that around 0.3-0.8% of the UK population are transgender. In Brent this would equate to between 1000 to 2500 people. ● The borough’s three largest religious groups are Christian (41%), Muslim (19%) and Hindu (18%). Between 2001 and 2011, there was a slight change in Brent’s resident’s religion or belief – there was a slight decline in those who stated that Christianity was their religion/belief, and a growth in the amount of residents who stated that their religion or belief was Islam. Compared with other areas, Brent residents are more likely to have a religion – in Brent, 82% of residents have a religion compared to just 68% nationally. 		
Education & Qualifications	<ul style="list-style-type: none"> ● As of March 2018 there were 85 schools in Brent. ● Brent’s school population has increased from 44,117 in 2011 51,524 in the 2017-2018 year. ● By 2023/2024 an additional 12 secondary forms of entry will be required. 	<ul style="list-style-type: none"> ● The Local Plan should seek to ensure that there is adequate provision of primary and secondary schools to support the current and future population. ● Opportunities to incorporate work based learning/training should be incorporated into the Local Plan where possible. 	S1, S7, EC4

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<ul style="list-style-type: none"> • At the end of 2017-2018, 96% of Brent schools were judged to be good or outstanding. • The proportion of primary pupils attaining the expected standard in reading, writing and mathematics at the end of KS2 was 63%, slightly below the London and national average. • In regards to secondary education, the average attainment rate in 2018 within Brent was 49.8, above the London average. • In 2018, on average, Brent students attained a grade C in each of their three A Level subjects. • The largest ethnic groups of statutory school age are Asian Indian (17%) and Black Somali (9%). • In 2018, there were 2076 Brent resident children and young people with an Education Health and Care Plan, of whom 1900 were attending a school and 176 were attending a further education provision. • The most common type of EHCP need within current school age children is Autistic Spectrum Disorder, followed by Moderate Learning Difficulties. 	<ul style="list-style-type: none"> • The Local Plan could explore the opportunities to evenly spread out the location of primary and secondary schools within the borough 	
Health	<ul style="list-style-type: none"> • Brent's residents are living longer, and life expectancy has been increasing. The life expectancy between 2016 and 2018 for girls 	<ul style="list-style-type: none"> • There is an opportunity for the Local Plan to promote physical activity by ensuring sufficient 	S1, S2,S4, S7

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>born in Brent is 85.1 compared to 80.2 for boys. Life expectancy varies at ward levels between the most deprived and least deprived wards for both male (6.4 years) and female (6.9 years)</p> <ul style="list-style-type: none"> • The current care provision in Brent is 67 practices, 66 dental practices, 75 pharmacies and 16 nursing homes. • Obesity is a significant health challenge to the borough, with it projected to increase between 2014 and 2030. • Over half of Brent’s adult population do not participate in sport or physical activity, the highest level of inactivity in West London with 3 in 10 adults classified as being inactive. • The rate of alcohol-related harm hospital stays is 561 per 100,000 population. • Mental health remains the single largest cause of morbidity within Brent, affecting ¼ of all adults at some time in their lives. • The TB incidence rate in Brent (82.9 per 100,000) is significantly higher than the London average. • Cardiovascular disease, chronic respiratory disease and cancers are the biggest killers in Brent. • The borough has high levels of long-term chronic conditions, many of which can often 	<p>sport and recreational facilities, in addition active travel, promoting walking and cycling.</p> <ul style="list-style-type: none"> • The Local Plan should seek to protect and enhance the borough’s current open spaces. • The Local Plan should seek to ensure that new developments can access open spaces and help to address areas of open space deficiency. Accessibility to green spaces can have benefits for both physical and mental health. • There is the opportunity for the Local Plan to identify schemes that will help its high street achieved a high school in the Healthy Streets Measure (out of 10) • Due to scale of development needed to achieve the London Plan housing targets, new healthcare facilities will need to be delivered. 	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>be related to poor lifestyles, relative deprivation and in some cases ethnic make-up.</p> <ul style="list-style-type: none"> • There is a rising level of dementia amongst older adults, with it expected that the total population who are aged 65 and over with dementia projected to increase from 2,379 to 3,857 by 2030. • Only 47.1% of the population in Brent were meeting the recommended 5-a day fruit and vegetable intake in 2014, below the London average of 50%. • Brent has 30,616 households with people living on their own. Of these, 29% are 65 and over. With the projected growth of those aged 5 and over it is forecasted that there will be a significant increase in those affected by social isolation and loneliness. • The GFR in Brent in 2018 was 68.1, higher than the Outer London and national average. 		
Crime	<ul style="list-style-type: none"> • Brent had the 5th highest number of domestic abuse crimes in comparison to most similar boroughs in the year to 16/17 • The number of crimes within Brent has increased by 3.1% in the year to 2018/19, although the rate is below the London average. • Brent has been identified as having a national-level gang issue. 	<ul style="list-style-type: none"> • The Local Plan should seek to ensure the design of development improves the safety and perceived safety of communities, in accordance with Secured by Design principles. • The Local Plan will need to consider integration of communities. Developments should ensure that there is inclusive design to support the diverse population of the borough. 	S4, S5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<ul style="list-style-type: none"> ○ Based on the 2017 gang matrix it is estimated that there are 22 gangs in Brent ○ It is estimated that there is over 1,000 individuals involved in gang criminality in Brent ○ However, as at 18/19, emerging gangs in Kingsbury, Wembley, Neasden and Willesden are now the main problem profile in Brent ● Anti-social behaviour (ASB) is a key priority in Brent <ul style="list-style-type: none"> ○ In 18/19 Brent received the third highest number of ASB calls in comparison to most similar London Boroughs. ○ Hotspots for ASB are gathered around the town centres ● In 2018, 47% of the population said that they felt safe walking outside in their local area alone after dark, with 15% feeling a bit unsafe and 10% feeling very unsafe. 	<p>The built environment should encourage community cohesion and reduce isolation.</p> <ul style="list-style-type: none"> ● The Local Plan should encourage the use of lighting and passive surveillance to help improve perceptions of safety. 	
Water	<ul style="list-style-type: none"> ● All waterbodies within Brent’s Blue Ribbon Network are achieving a ‘moderate status’. The Water Framework Directive requires all members’ states to achieving a ‘good status’ for all water bodies. ● Areas in proximity to Welsh Harp, Wealdstone Brook and the River Brent, and 	<ul style="list-style-type: none"> ● The Local Plan should seek to improve water quality by promoting the naturalisation of water bodies and ensuring that there is sufficient infrastructural capacity for new development, ahead of occupation including Sustainable Urban Drainage Systems. 	EN3, EN4, EN12

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>areas within the Stonebridge Ward are at risk of fluvial flooding.</p> <ul style="list-style-type: none"> • There are a number of areas within the borough that are at risk to surface water flooding. Areas particularly susceptible to surface water flooding is the borough's road network • Areas within the borough that are located in functional floodplain are in close proximity to the River Brent. • The borough has 27 critical drainage areas within Brent. • The two areas of the borough where surface water flooding is likely to be caused by pluvial, sewer and groundwater flooding is Kenton and Northwick Park and Preston Road. • There are areas within the northern and western region of the borough where sewer capacity is near full utilisation. 	<ul style="list-style-type: none"> • The Local Plan should require increased efficiency in the use of water through design measures. • The Local Plan should support opportunities for recreation on Grand Union Canal and Welsh Harp. • The Local Plan should seek to reduce risk of flooding to people and property through guiding development to areas of lowest risk of flooding, and require developments to include mitigation schemes, such as SUDS when appropriate. 	
Air Quality	<ul style="list-style-type: none"> • Brent does not meet the national air quality targets for Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). • The largest contributor the poor air quality in Brent is local energy generation, construction and road transport. <ul style="list-style-type: none"> ○ Transport and traffic is the largest contributor, accounting for at least 52% of all emissions. 	<ul style="list-style-type: none"> • The Local Plan should seek to improve air quality. This can be achieved through a variety of means, such as the promotion of renewable energy, the full enclosure of waste management activities, modal shift to public transport and sustainable construction. 	EN1, EN4

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<ul style="list-style-type: none"> It is likely that pollution for construction works will continue to be a big polluter due to the amount of homes required to be built. The Council has created four air quality action areas at Neasden Town Centre, Church End, the Kilburn Regeneration Area and Wembley and Tokyngton. 		
Soils & Geology	<ul style="list-style-type: none"> The geology of Brent consists predominantly of London Clay of the Barnet Plateau underlain by a chalk aquifer. Barn Hill Open Space has been put forward for designation as a Locally Important Geological Site (LIGS), due to the presence of Dollis Hill Gravel. 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 to whether they were 'contaminated' as per the statutory definition. 	<ul style="list-style-type: none"> The Local Plan should seek to protect LIGS. The Local Plan should seek to support the decontamination of soil within the local area The Local Plan should seek to protect the area's soils from contamination and continue to remediate areas that were impacted in the past 	EN4, EN10
Climate Change	<ul style="list-style-type: none"> There are a number of 'possible' future risks (i.e. heavy thunderstorms and intense winter downpours, increased storminess, higher temperatures) that could occur in Brent as a result of climate change Climate change will have a number of social impacts of the borough's residents. In 2017, the Mayor of London committed to London being zero carbon by 2050. Nearly 	<ul style="list-style-type: none"> Greenhouse gas emissions should be reduced at the rate, and exceeding where possible, required to meet local and national targets, helping to mitigate the impacts of climate change. The reduction of energy use in the area should be encouraged both by existing developments and future ones. This might include the 	EN8, EN9, EN12

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>half of Brent's emissions come from the resident's homes, with a third from industry and commercial and a fifth from road transport.</p> <ul style="list-style-type: none"> Climate Change can increase the area within the borough which is impacted by flood risk; both fluvial and surface water. 	<p>development of a site-wide decentralised energy generation in growth areas.</p> <ul style="list-style-type: none"> A high proportion of energy generated should be from low, zero or negative carbon energy sources. The Local Plan should ensure that developments take into consideration the impact that climate change could have on flood risk within the borough, and where appropriate, that appropriate mitigation and adaption schemes are implemented. 	
Biodiversity, Flora & Fauna	<ul style="list-style-type: none"> The condition of the 62 Sites of Importance for Nature Conservation (SINCs) varies from poor structure and species diversity to species-rich and structurally diverse. There are a number of invasive species recorded on various SINC sites. <ul style="list-style-type: none"> Three of the commoner invasive species were recorded in Brent River Park, and large stands of Japanese Knotweed were recorded on several sites, particular on the railway tracksides. Parakeets were found in a number of parks within the borough. There are no European or other internationally designated sites in the borough. The closest international site is Richmond Park. There are 260 TPO's within the borough 	<ul style="list-style-type: none"> The Local Plan should seek to ensure that impacts to designations, species and habitats is minimised as well as seeking to encourage increased biodiversity within the area, having regard to the site specific recommendations of the SINC study. Opportunities should be sought to ensure that protected species have favourable conservation status and are thriving, and invasive species are removed. Opportunities should be sought to promote habitat connectivity both within the area and outside of it, taking into account strategic links identified in the All London Green Grid and the Blue Ribbon Network. The layout of connected habitats and a wider green infrastructure scheme of walking and cycling routes could form the basis for the Local Plan. 	EN3, EN5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<ul style="list-style-type: none"> Located within Brent and Barnet is the Brent Reservoir SSSI. The SSSI is of interest primarily for breeding wetland birds (in particular for significant numbers of nesting great crested grebe). The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London. 	<ul style="list-style-type: none"> The Local Plan should explore opportunities to incorporate biodiversity into new developments. The Local Plan should continue to protect trees with preservation orders, and where appropriate create encourage the creation of new TPOs. 	
Architectural and archaeological heritage (Heritage Assets)	<ul style="list-style-type: none"> Brent's heritage assets include a wide range of architectural styles from Victorian Italianate, Gothic Revival, suburban 'Arts and Crafts', 'Tudor Bethan', 'Old World', modern and brutalist. Brent has 1 Grade I listed building, 9 Grade II* listed buildings and almost 240 Grade II listed buildings It has 3 Registered Parks and Gardens and 40 parks and gardens on the London Parks and Gardens Trust national inventory Brent has 9 properties on Historic England's Heritage at Risk register. There are 22 conservation areas in Brent, which covers 7.47% of the borough. The Council has identified 4 archaeological priority areas (APAs) where there are significant known archaeological interest or potential for new discoveries. It has also 	<ul style="list-style-type: none"> The Local Plan should ensure that both designated and non-designated or undiscovered heritage assets and their settings, and archaeological remains are protected and, where appropriate, enhanced. Heritage assets throughout the borough could provide an opportunity for tourism and leisure. Opportunities should be sought to safeguard and promote awareness of the important heritage assets and their settings. Heritage assets could also provide an opportunity to enhance the area environmentally, socially, as well as economically through regeneration. This should be considered throughout the development of the Local Plan, with assets being enhanced and conserved for future use. In particular opportunities to protect heritage identified as being at risk should be considered. 	EN7

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>identified 40 local sites of Archaeological Importance (SAI)</p> <ul style="list-style-type: none"> There are over 200 non-designated heritage assets on the Council's Local List. 	<ul style="list-style-type: none"> The Local Plan will need to be mindful of the planned review of Archaeological Priority Areas in 2019. The Council should consider reviewing its Local List alongside the Local Plan. 	
Landscape and Townscape	<ul style="list-style-type: none"> A townscape Analysis undertaken in 2007 found that a number of areas within the borough were of a low townscape quality. <ul style="list-style-type: none"> However, since this study was undertaken many areas, such as South Kilburn, Stonebridge and Wembley, have been subject to, or are in the process of significant development. This has resulted in improvements to the quality of the built environment and the public realm. The majority of Brent is within the 'Brent Valley and Barnet Plateau' landscape area. There are 180 open spaces, of various types and size, located within the borough. 	<ul style="list-style-type: none"> The Local Plan will be supported by an Urban Characterisation Study, to inform how townscape character and quality is maintained/enhanced through high quality design, careful siting, and incorporation of soft landscaping. Opportunities could be sought to maintain the important heritage of Brent. Integration with the All London Green Grid Area SPG Frameworks is an important consideration. 	S4, EN6, EN11
Waste	<ul style="list-style-type: none"> The total amount of municipal waste collected in 2018/19 was 106,900 tonnes, a reduction from 107,683 in 2017/18. In 2018/19, 33% of the borough's waste was recycled and composted. In Brent, there are 12 existing safeguarded sites, with the Veolia Transfer Station and 	<ul style="list-style-type: none"> The Local Plan should seek to increase rates of recycling, reuse and composting of waste, which would otherwise be sent to landfill. For example, through innovative solutions such as the 'integrated circular economy,' whereby products are created, used and recycled locally. 	EN2

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>Twyford Transfer Station identified for increased capacity.</p> <ul style="list-style-type: none"> The London Plan (2016) allocated each borough an amount of London's waste that it has to positively plan for and manage. The new draft London Plan (Intend to Publish) also forecasts the arisings of household, commercial and industrial waste. 	<ul style="list-style-type: none"> The Local Plan will need to ensure Brent continues to contribute to meeting West London's Waste apportionment in line with the West London Waste Plan. This will need to be balanced with the need to improve air quality, and therefore the Plan may seek to promote innovative waste management and transport techniques which are less detrimental to air quality. 	
Transportation	<ul style="list-style-type: none"> The most popular mode of transport for Brent residents is the car, accounting for an average of 41% of trips originating in Brent per day. Brent has a relatively limited high-order road network which plays an important role for freight and traffic which cannot be transferred to public transport. <ul style="list-style-type: none"> In 2013, 846 million vehicle kms were travelled in Brent, which equates to 2.9% of all London traffic. High levels of congestion reduce the quality of life for Brent residents. Between 2004 and 2012, Brent saw a 45% reduction in KSIs (killed or seriously injured) from road traffic collisions. In 2017, 6 people were killed and 126 were seriously injured. Cycling only accounts for a small proportion of trips originating within Brent (1%). 	<ul style="list-style-type: none"> Opportunities should be sought to maximise modal shift towards sustainable transport modes, in particular, walking and cycling. The Local Plan should seek to maximise opportunities to improve rail capacity within the borough The Local Plan should encourage the use of rail as a means of getting around the borough, and to other locations within London. The Local Plan should identify opportunities that will allow development around transport hubs. Opportunities should be sought to direct development to accessible locations and secure transport upgrades to enable development. The Local Plan can help increase the modal share of journeys by bike by protecting existing and securing new cycle routes, in line with the 	EN1, EC5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<ul style="list-style-type: none"> • Pedestrian share accounted for 26% of all trips made by Brent residents and those which originate from within the borough. The Council aims to increase this to 30% by 2021/22. • Brent is well served by a variety of public transport networks (4 London Underground Lines, London Overground services, Chiltern Railway services, southern railway services and London bus services). • Public transport accounted for 33% of resident trips per day. The most popular mode of public transport for Brent residents was the bus. <ul style="list-style-type: none"> ○ Due to traffic congestion and a lack of dedicated infrastructure, buses are often stuck in traffic, leading to slow travel speeds and a lack of travel time reliability • There is variation in PTAL levels across the borough, particularly between the northern and southern region. However, public transport schemes, such as the West London Orbital Route, can see improvements in accessibility in some areas. • Brent has a number of industrial estates that both rely on and generate freight movement. • There were approximately 88,000 on-street parking places across the whole of Brent. 	<p>route network identified in the Brent Cycling Strategy.</p> <ul style="list-style-type: none"> • Ensure streets designed to healthy streets and living streets standards to promote walking. • The Local Plan could promote opportunities to use sustainable modes of transport to move freight, such as rail and canal 	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<ul style="list-style-type: none"> ○ The Council has introduced 40 controlled parking zones across the borough, serving 56,000 households and with over 33,000 on-street parking spaces. ○ The Council operates 12 public car parks which has a total of 796 spaces. There are also over 700 spaces in privately owned car parks. 		
Noise	<ul style="list-style-type: none"> ● There are a number of sources of noise pollution in the borough. These sources include ambient noise, which can originate from transport and industry. These are supplemented by more periodic local noise such as construction works, roadworks, late night venues, public events, street activities and ventilator/extractor units. ● Areas adjacent to the North Circular Road in Brent has been identified as amongst the most affected by traffic noise in the UK. ● The Council has identified a number of quiet areas within the borough. 	<ul style="list-style-type: none"> ● The Local Plan should seek to minimise the effects from noise pollution on the existing and incoming population, and ensure that these effects do not disproportionately affect any particular socio-economic or equalities group. ● The Local Plan should seek to protect the tranquillity of Quiet Areas. 	EN4
Local Economy	<ul style="list-style-type: none"> ● Brent's resident workforce totals approximately 164,830 as at March 2019. <ul style="list-style-type: none"> ○ SOC (Standard Occupation Classification) Major Groups 1-3 forms the largest portion of Brent's workforce. However, the proportion of the resident workforce in these groups 	<ul style="list-style-type: none"> ● The Local Plan should seek to provide employment and business opportunities that meet the current and future needs of the local and regional economy. ● The Local Plan should consider how it can continue to support local enterprise, including micro-enterprises. 	EC1, EC2, EC3, EC4, EC5

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>is significantly lower than the London average. The number of businesses based in Brent has grown from 10,220 in 2010 up to 15,030 in 2018 – an increase of 47%. This has been driven by a rise in the number of small “micro” businesses.</p> <ul style="list-style-type: none"> ○ Over the same period, the employment rate has been rising: around 69.5% of Brent’s working age population are now in employment. • There are a number of SOC groups that are over-represented in Brent. These include skilled trade occupations and elementary occupations. • Brent’s key employment sectors are ‘Motor Trades (16%), ‘Retail’ (10%), ‘Education’ (9%) and ‘Business Administration and Support Services’ (9%). • Micro businesses (0-9 employees) form a significant proportion of the borough’s business stock. • Large businesses represent the smallest share of business stock within the borough. • There is currently a total of approximately 395ha of land currently in active industrial use in Brent. Strategic Industrial Land accounts for around 75% of the borough’s total industrial land portfolio, Locally 	<ul style="list-style-type: none"> • The Local Plan should seek to ensure that the appropriate infrastructure capacity is developed and planned comprehensively, ahead of the occupation of new development. • There is a need to address the shortfall in office floorspace, and ensure sufficient employment land is provided to meet the assessed need. • The Local Plan could support the creation of mixed-use development • The Local Plan should encourage the provision of affordable employment space. • Targeted approach to employment, ensuring all within the borough have equal access to employment 	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>Significant Industrial Sites around 14% and the remainder is contained within Local Employment Sites.</p> <ul style="list-style-type: none"> • There is approximately 27700 sqm of gross office B1a floorspace in Brent's town centres, and a further 74,000 sqm predominantly in industrial clusters. There is additional demand for between 32,600sqm and 52,350 sqm of office floorspace in the borough has been identified to 2029. However, office floorspace is under threat from prior approvals. • In 2019, the average gross weekly pay in Brent was estimated to be £610.20 for full time workers. This is lower than the London average of £699.20. 		
Deprivation and living environment	<ul style="list-style-type: none"> • Brent's is the 49th most deprived borough in the UK. <ul style="list-style-type: none"> ○ Brent is divided into 173 Lower Super Output Areas (LSOAs), of which 10 are within the 10% most deprived LSOAs in the country. • In 2015, the claimant rate for Housing Benefit was 30% in Stonebridge and Harlesden, 6% in Northwick Park and under 5% in Kenton. In March 2018, there were 24,488 housing benefit claimants overall. • In 2015, it was estimated that 14,702 dwellings were fuel poor, which equates to 	<ul style="list-style-type: none"> • Deprivation is a complex issue with multiple aspects. In delivering employment opportunities, high quality new housing, improved social infrastructure, including access to education, and a higher quality environment the Local Plan can contribute toward reducing deprivation. • As there are areas within the borough that are within the 10% most deprived LSOAs in the country, the Local Plan could consider a targeted approach to reducing deprivation. 	S1

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>13.1% of all households. This is higher than both the London average and England average.</p> <ul style="list-style-type: none"> • In 2011-2014, levels of child poverty in Brent was higher than the London and England average. <ul style="list-style-type: none"> ○ The highest rates of child poverty in the borough are in Dollis Hill, Alperton and Kilburn. 		
Housing	<ul style="list-style-type: none"> • It is estimated that there are 121,048 households in Brent (as at 2011). It is projected that the number of households will increase by 1.45% each year to 2050. • Brent's 2018 SHMA identified an OAN of 48,000 dwellings between 2016-2041, which equates to 1920 dwellings per annum. This includes an OAN for 22,100 affordable homes over the same time period, which equates to an average of 884 dwellings per annum. The draft London Plan 2018 places the requirement on the borough to 2,915 dwellings per annum over a ten-year period. • The 2018 SHMA identified that there was a high need for 3 bedroom properties in both the market and affordable sectors. • There is variation in the housing stock across the borough; wards within the southern region have a higher proportion of 	<ul style="list-style-type: none"> • A key challenge for the Local Plan will be to identify sufficient sites to meet the borough's housing need, with a particular focus on affordable housing. • The Local Plan will need to secure an appropriate mix to meet need, in terms of size, tenure and specific specialist needs. • The Local Plan will need to be informed by an assessment of the need for further gypsy and traveller plots. 	S3, S4

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevant Draft IIA Objective(s)
	<p>flats, whereas wards within the northern region have a higher proportion of houses.</p> <ul style="list-style-type: none"> • There has been a significant increase in the amount of flats/maisonettes or apartments within the borough. This dwelling type now accounts for 1/3 of the borough's housing stock. • Between 2001 and 2011, the mean household size in Brent went from 2.6 to 2.8. It is anticipated that the average household size will fall to 2.3 by 2050. • Between January 2013 and December 2019, house prices in Brent were above the London average for the majority of the time and significantly above the national average. • The amount of the population who own their own house has decreased since 2001, with there being a significant tenure shift to the private rented sector. • There is one Gypsy and Traveller site in the borough at Lynton Close, Wembley, which contains 31 plots. 		

Table 7: Baseline Information Summary

5. Draft Local Plan Vision and Objectives

5.1. The Brent Local Plan contains the following vision:

“Brent will continue to be a great place to live and work. Brent will welcome change and good growth concentrated in accessible areas that better delivers shared prosperity.

The Local Plan will ensure a future built for everyone through regeneration to grow the local economy, improve health and well-being and provide the jobs, homes, transport, green spaces and cultural assets that people need.”

5.2. The vision of the draft Local Plan vision has been assessed against the objectives contained within the IIA frameworks. The results of this assessment are displayed below.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Local Plan Vision	++	+	++	+	+	+	+	+	?	?	?	+	?	+	?	?	?	+	?	+	+	+	?	?

The Vision is concise and high level in terms of its content. Overall in terms of its influence on the Local Plan contents and outcomes it should serve to positively impact on the following objectives including: social inclusion (significantly), health, housing (significantly), crime, diversity, accessibility, traffic, biodiversity, heritage, open space, flooding, regeneration, employment, investment education, and efficient infrastructure. The vision is inclusive, seeking to attain growth that meets the needs of everyone. The emphasis on the provision of homes, jobs, transport, good health and well-being and some of the social infrastructure that people need for good quality of life will assist ensuring better health of the population. Delivery of these outcomes is also likely to have positive impacts in relation to reduction of crime as people can better meet their needs and be less likely to turn to crime to meet those needs, or perpetrate crime related to feelings of alienation.

On waste management, water resources, environmental health, townscape, climate change mitigation and adaption, soil, flooding, education and infrastructure the vision the impacts are less clear as there is no direct reference to these issues. Greater clarity on this would only be addressed through a longer vision which identifies a much wider range of issues. Whilst this might more obviously address strategic sustainability objectives it is likely to result in a long vision, which will be less clear on what are the most important priorities.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassigned and belief the policy will have benefits to those with a protected characteristic. The vision makes reference to providing ‘a future built for everyone’ and as such is inclusive at the widest level in its approach to meeting the needs of the local population. The more detailed aspects such as providing more homes, jobs, transport, green spaces, health and well-being and cultural assets will have differing positive impacts depending on the extent to which some of those protected characteristic groups are more likely to otherwise have limited choice to access these items. For instance black and minority, or disabled people are more likely to live in poverty, have lower wages, etc. and therefore more reliant on affordable housing, or public transport to move around.

5.3. The vision of the Local Plan is supported by a number of objectives; these are reflective of the six good growth principles/policies identified within the London Plan. The objectives supporting the Brent Local Plan identify locally specific priorities to assist in the delivery of the good growth policies.

Strong and Inclusive Communities

- a) Reduce spatial inequalities within Brent and incidences of areas with high levels of multiple deprivation by promoting mixed and balanced communities particularly around Wembley, Stonebridge, Harlesden, Neasden and South Kilburn and on council housing estates.
- b) Building on Brent’s status as London Borough of Culture 2020 by supporting inclusive places, where ethnic diversity is celebrated and recognised, and places where cultural activities are already concentrated, e.g. Wembley, Cricklewood and Kilburn High Road
- c) Create a more equal and affordable borough, where the opportunities to access good quality housing, employment, education, digital connectivity and culture are maximised
- d) Strengthen the existing sense of community by celebrating Brent’s diversity, heritage and culture, and creating places where Brent’s community can meet

Making the best use of land

- a) Prioritising development in new and more efficiently and intensively developed Growth Areas such as Northwick Park, Staples Corner and Neasden and continuing to deliver in those that have already been started, such as Alperton, Burnt Oak/Colindale, Church End, South Kilburn and Wembley to enhance environmental quality, and bring benefits to the community

- b) Supporting higher density development in Brent's town centre and in areas with good accessibility to public transport
- c) Encouraging greater access, recreational use and also understanding of ecology in Brent's extensive areas of open spaces, such as the Welsh Harp and Fryent Country Park

Creating a Healthy Borough

- a) Using the iconic sporting heritage associated with Wembley stadium to play its part in stimulating greater levels of activity
- b) Integrating physical activity back into the everyday lives of residents through promoting safe environments, active travel and improving access to open spaces, sports and leisure facilities.
- c) Improving physical and mental well-being for borough residents by adopting a health-integrated planning approach
- d) Reducing health inequalities through focusing on narrowing the gap between the most affluent and the most deprived areas of the borough
- e) ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough

Growing a Good Economy

- a) As a 'provide capacity' borough in the London Plan, make better use of Brent's ~~employment~~ industrial land through a structured approach to deliver industrial ~~its~~ intensification and land release, where appropriate and also where possible support additional housing/ community facilities through co-location.
- b) Support Brent's priority high streets in adapting to the changing way people shop, lifestyles and the challenges posed by other large centres in London
- c) Promote and support a strong and diverse night-time economy in Kilburn to contribute to London's role as a 24-hour city

Increasing Efficiency and Resilience

- a) Reduce carbon emissions by supporting the continued expansion of local and renewable energy systems such as those at Wembley Park and South Kilburn into other Growth Areas
- b) Tackle congestion and air quality around the North Circular, improving orbital public transport routes such as the West London Orbital railway scheme to provide realistic alternatives to travelling by car

- c) Reduce the risk of flooding from the River Brent and its tributaries and other sources by putting the right development in the right places and reducing surface water run-off and potable water use
- d) Provide a safe and inclusive environment around Wembley Stadium and Wembley Arena to support their iconic status for positive memories to be made
- e) Continue to support Brent's award winning street tree planting initiatives and greening of the built environment to combat air pollution, flooding, overheating and threats to ecological habitats

Delivering the homes to meet Brent's needs

- a) Housing delivery will be maximised, with sufficient planning permissions to support delivery of on average 2038 homes a year in the period to 2041 to meet principally Brent's housing needs but also those of wider London;
- b) Providing new homes in truly mixed, inclusive communities across a range of tenures, maximising the provision of affordable homes with a particular emphasis on social rented properties, but also more affordable home ownership and improved opportunities for higher quality market rented properties;
- c) Providing new family housing with at least 25% of new homes being 3 bedrooms or more, recognising that Brent's suburban context provides opportunities for houses as well as flats;
- d) Meeting the growing need for specialist housing such as the 230 homes for older people per year to accommodate Brent's aging population and others with challenges who may require additional support.

5.4. The objectives were tested against the IIA framework to determine how compatible they are with the principles of promoting sustainable development, taking into environmental, social and economic conditions.

Strong and Inclusive Communities																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	++	+	n/a	+	+	+	n/a	+	n/a	n/a	+	n/a	++	+	+	+	+	+	n/a	+	+	+	+	+
B	+	n/a	n/a	n/a	n/a	++	n/a	+	n/a	n/a	n/a	n/a	+	++	+	n/a	n/a	n/a	n/a	+	+	+	+	?
C	+	n/a	++	n/a	+	+	++	+	-	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	+	++	++	++	++
D	+	n/a	n/a	+	n/a	++	+	+	n/a	n/a	n/a	n/a	+	++	+	n/a	n/a	n/a	n/a	+	n/a	+	+	?

These objectives build on the London Plan policy of the same name. Taking account of this policy too when considering its impacts in relation to the IIA objectives, it is clear that whilst for each of the particular local areas of emphasis have differing impacts, none are adverse and where relevant they are positive or very positive in terms of outcomes. The social and economic elements are more relevant to all of the criteria, with the exception of priority a) which is based on prioritising development in certain areas, which is also likely to lead to environmental benefits in those areas.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. This good growth policy builds on that of the draft London Plan, which in itself specifically makes reference to “support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers and challenges and inequalities”.

Making the best use of land

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	n/a	n/a	++	+	n/a	n/a	+	++	?	-	?	+	++	?	+	+	+	?	+	++	+	++	+	++
B	n/a	n/a	+	n/a	+/-	n/a	+	++	?	-	++	+	+	?	++	+	+	+	+	++	+	++	+	++
C	n/a	+	n/a	+	n/a	n/a	+	?	n/a	+	?	++	+	n/a	?	n/a	?	++	n/a	n/a	n/a	n/a	+	+

These objectives are based on encouraging the better use of land to meet identified needs, for housing, jobs and social infrastructure. This supports higher density development, thus improving opportunities to reduce the need to travel and provide critical mass of population to support local services and also recognised features of local importance such as town centres. In Brent the emphasis is on areas which also have higher levels of recognised deprivation to better ensure local residents benefit from development. The policy seeks to ensure that positive places/ townscape is protected/ enhanced whilst less well performing areas are priorities for development. The policy by reusing brownfield land also gives greater potential to ensure that open space is protected, but also better used due to increased population. The better use of land will also reduce opportunities for crime to occur by giving more opportunities for places to have better natural surveillance. On the majority of impacts identified in relation to the IIA objectives the impacts are positive or very positive. Where impacts are not so clear is focused on a range of environmental objectives, such as waste management.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. This good growth policy builds on that of the draft London Plan. The focus on Growth Areas is more likely to benefit those with a protected characteristic that is more likely to make them be at risk of being deprived as they are more likely to be congregated in these areas, e.g. black and ethnic minority groups who are more likely to be in low paid work or unemployed and therefore live in public sector or cheaper rented accommodation which is more prevalent in these areas.

Creating a Healthy Borough																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	n/a	++	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a	+
B	+	++	n/a	+	n/a	+	+	++	n/a	n/a	++	n/a	++	n/a	++	+	?	++	+	+	+	++	+	++
C	+	++	+	+	n/a	n/a	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	+	n/a
D	+	++	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	+	n/a	n/a	n/a	+	n/a	+	+	n/a	++	+

These **objectives** are based on ensuring that health needs are met directly through health care provision but also through creating an environment which creates healthier people who are therefore much less likely to call upon measures to deal with poor health symptoms. In relation to places this will be though promoting healthy streets, good access to public transport, open spaces, etc., but also developing in areas where the local population is more deprived and therefore potentially better able to benefit from new development. The integration of green space and bio-diversity into development and people’s every-day lives will also assist with this. Overall where impacts have been identified in relation to the objective they have been positive across the whole range of social, environmental and economic.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. This good growth policy builds on that of the draft London Plan. The focus on new development in Growth Areas is more likely to benefit those with a protected characteristic that is more likely to make them be at risk of being deprived. This is as these groups are more likely to be congregated in these areas, e.g. black and ethnic minority groups who are more likely to be in low paid work or unemployed and therefore live in public sector or cheaper rented accommodation which has a higher prevalent in these areas.

Growing a Good Economy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	n/a	n/a	+	+	n/a	+	+	+	?	n/a	?	+	+	+	++	+	++	+	+	++	++	++	+	++
B	n/a	n/a	+	+	n/a	+	++	+	+	n/a	+	n/a	+	++	+	n/a	n/a	n/a	n/a	++	++	++	n/a	++
C	n/a	n/a	n/a	n/a	+/-	+	+	n/a	n/a	n/a	-	n/a	+	++	+	n/a	n/a	n/a	n/a	++	++	++	n/a	+

These objectives are based on ensuring that the economy in Brent helps with the prosperity of the local population and provides better paid and more fulfilling. A key element will be using mixed use development to encourage greater investment through re-provision of employment space, which historically in Brent has realistically suffered from underinvestment. This will assist in attracting and meeting for growth sector industries/ employers who will be looking for higher quality space. Promoting Brent's town centre's will ensure continued local facilities for residents to better help meet their needs but also in relation to the night time economy draw additional people into the borough. Overall where impacts have been identified in relation to the objective they have been positive across the whole range of social, environmental and economic. An uncertain element is the potential for impact on crime associated with the night time economy. This will require co-ordination between planning, licensing, police and other regulatory measures such as waste management.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. These objectives build on that of the draft London Plan policy of the same name. The focus on new development in Growth Areas is more likely to benefit those with a protected characteristic that is more likely to make them be at risk of being deprived. This is as these groups are more likely to be congregated in these areas, e.g. black and ethnic minority groups who are more likely to be in low paid work or unemployed and therefore live in public sector or cheaper rented accommodation which has a higher prevalent in these areas.

Increasing Efficiency and Resilience																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	+	+	n/a	+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	n/a	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
B	+	+	n/a	+	n/a	n/a	+	++	n/a	+	++	+	+	n/a	++	n/a	n/a	n/a	n/a	n/a	+	++	n/a	++
C	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a	++	?	+	+	n/a	n/a	++	+	n/a	++	n/a	n/a	n/a	n/a	n/a

D	+	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	+	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	n/a
E	n/a	+	n/a	+	n/a	+	n/a	+	n/a	++	++	++	++	+	++	++	++	++	++	n/a	n/a	++	n/a	n/a

These objectives are based on increasing efficiency and resilience in Brent. Key elements of achieving this will be to reduce carbon emissions through a variety of means, including supporting the expansion of local and renewable energy systems; tackling congestion and thereby improving air quality by providing realistic alternatives to travelling by car; reducing flood risk by ensuring the right development is put in the right places and reducing fluvial/surface water run off risk and potable water use; ensuring that a safe and inclusive environment around Wembley Stadium and Wembley Area is provided; and ensuring the continuation of support of Brent's tree planting initiatives and greening of the build environment. Together, these objectives will help to combat air pollution, flooding, overheating and threats to ecological habitats. Overall, where impacts have been identified, these are positive across social, environmental and economic criteria, but particularly in relation to environmental criteria.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. These objectives seek to ensure that Brent is increasingly efficient and resilient as a borough. This will be of benefit to all residents, and as such, all protected groups. However, this policy is likely to have particularly positive impacts on the groups of pregnancy and maternity, age, and disability, as those groups may be particularly vulnerable to the impacts of not reducing congestion, improving air quality and providing safe and inclusive environments.

Delivering the homes to meet Brent's needs																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
A	+	+	+	?	?	?	+	-	-	?	?	?	?	?	-	?	?	+	+	+	+	++	+	?
B	+	++	++	+	n/a	+	n/a	+/-	-	?	?	?	?	?	?	?	?	n/a	n/a	++	+	++	+	?
C	++	++	++	+	n/a	+	n/a	-	-	?	-	?	?	?	?	?	?	n/a	n/a	+	+	+	n/a	n/a
D	++	+	++	+	n/a	+	n/a	n/a	-	?	-	?	?	?	?	?	?	n/a	n/a	+	+	+	n/a	n/a

The objective is based on ensuring that Brent is better to meet its own and also London's housing needs. This includes providing for an increase in housing numbers across the Local Plan timescale, providing homes in mixed communities, whilst meeting a need for a range of tenures, ensuring that family homes are provided and also that older people's needs are better met. The range of interventions impact across the range of social, environmental and economic objectives. The impacts are relatively balanced in terms of number between the

positive or very positive and the unknown. There is some negative element in relation to waste and (air) pollution. The benefits of the housing policies are particularly based around the social and economic element. This is because people will be better able to meet their housing needs and as this is such a fundamental part of a person's life, it has many impacts. The benefits also relate to economic objectives including the investment and ability to find work/ better skills. Most of the uncertain elements are based around the environment and will have to be addressed elsewhere in the Plan by other policies. E.g. the need to find space for homes will lead to pressure to develop sites in other use, this will require policies to protect these uses if needed, or ensure that they are re-provided.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. This good growth policy builds on that of the draft London Plan. The focus on building more homes and homes that better meet needs is more likely to benefit those with a protected characteristic that is more likely to make them be at risk of being deprived, e.g. black and ethnic minority groups and the disabled who are more likely to be in low paid work or unemployed and therefore live in public sector or cheaper rented accommodation, or not afford any accommodation. In addition, it will benefit the young whose life chances will be improved if they are living in over-crowded accommodation and able to move to a home that better meets their needs. The same is true of older people, or those with supported housing needs.

5.5. The above assessment demonstrates that in general, the implementation of the Local Plan objectives will achieve positive outcomes, and are in general conformity with the IIA objectives. In particular, there are significant positive impacts in relation to housing, economic regeneration and health and well-being.

6. Publication Stage Policies and Reasonable Alternatives Appraisal

6.1. The results from the appraisal of the publication stage policies and reasonable alternatives against the IIA framework are detailed below.

Design

Policy: POLICY DMP1: DEVELOPMENT MANAGEMENT GENERAL POLICY																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
<p>There are no anticipated negative impacts associated with the implantation of this policy.</p> <p>This policy should serve to positively impact all criteria, including: social inclusion, health, housing, quality of surroundings, crime, community identity, accessibility, traffic, waste management, resources, environmental health, biodiversity, townscape, heritage, climate change mitigation and adaption, soil, open space, flooding, regeneration, employment, education, and efficient infrastructure. By addressing all of these needs within one policy it encourages their consideration as a more holistic approach, enabling benefits to be sought from alternate avenues, enhancing the provision and integration of infrastructure which meets a wide array of needs.</p> <p>On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. The policy supports proper consideration to a wide range of factors that support delivery of development that best meets the needs of the whole community and takes into account the needs of those with protected characteristics. For example, the policy seeks to ensure that development is satisfactory in terms of means for access for all (which will benefit those with limited mobility) and ensures high levels of internal amenity which is regarded as essentially meeting the needs of its occupants. Where these occupants have special needs, it would be expected that the design and layout of the property would meet these needs. This is a high level policy and matters such as requirements specifically around access within the home are addressed by other policies (for example, the London Plan, housing policies). This policy also seeks to ensure that residents do not have unacceptable increased exposure to flood risk, noise and air quality (which will be beneficial to everyone). Other key elements are ensuring necessary social and physical infrastructure and no loss of community facilities.</p>																								
<p>Policy Alternative: No policy.</p>																								

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

It is not anticipated that this policy will provide any positive impacts.

This policy will likely impact the following criteria negatively: social inclusion, health, housing, quality of surroundings, crime, community identity, accessibility, traffic, waste management, resources, environmental health, biodiversity, townscape, heritage, climate change mitigation and adaption, soil, open space, flooding, regeneration, employment, education, and efficient infrastructure. Although these criteria are all likely to be covered in detail in National Planning Policy, the London Plan, and the Local Plan, the policy provides stakeholders with a general overview of all the criteria with which they should concern themselves should they wish to involve themselves in the regeneration of the borough. This allows for a more successful planning system whereby a greater percentage of applications are granted, helping to increase developer interest and associated redevelopment within the borough.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief a lack of policy could have negative impacts to those with a protected characteristic. A lack of policy might reduce the proper consideration of some factors that support delivery of development that best meets the needs of the whole community and takes into account the needs of those with protected characteristics. Although the policy is helpful in bringing together a range of issues that need to be addressed by development policies in the London Plan are likely to sufficiently address most of the points of DMP1. As such there are not likely to be any significant differences between this scenario and having the policy.

Conclusion: The proposed policy is seen as the most appropriate and should provide positive benefits across the board. It is important for potential stakeholders to understand what consideration is required when putting forward a development proposal. Therefore, this policy serves to provide a general overview of considerations, acting to increase application success rates, increasing council efficiency and developer interest.

Policy BP1: Central																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	+	++	+	0	++	+	+	-	+	-/+	++	+	+	0	0	+	++	+	++	+	++	0	+

Social impacts are considered to be positive. The policy will encourage prosperity, will improve health and wellbeing by way of protecting and enhancing access to open space and leisure facilities and will help to provide everybody the opportunity to live in a home which is suitable to their needs by way of providing approximately 15,000 new homes. This will contribute towards providing a high quality environment for residents to live and work in and will enhance community identity by of encouraging the securing of provision for needs arising from new housing development.

Environmental impacts are considered to be predominantly positive. There may be some slight negative impacts in terms of increased production of waste which is associated with increased development, and potential for some increased noise and light pollution. However, the positive impacts will include an increased provision of open space, an enhanced landscape and townscape and the reduction of the effect of traffic on the environment by way of promoting sustainable modes of transport through promoting access by public transport, bicycle or on foot.

Economic impacts are considered to be positive. The policy will promote sustainable resilient and inclusive economic growth, will increase opportunities for everybody to access rewarding and satisfying employment, and will facilitate both indigenous and inward investment in the borough by way of introducing a greater proportion of employment floorspace in new mixed-use developments on Watkin Road and First Way, and increasing the supply of modern, affordable workspace developments for the arts and creative industries.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. In relation to disability, although the policy encourages car free access and lower parking provision, policies in relation to parking (Appendix 4 of the Local Plan, and London Plan policy) will apply, and therefore parking standards for those with a disability will accord with London Plan policy. This will ensure that there will be no negative impacts on this protected characteristic.

Conclusion: The proposed policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Central place of Brent.

Policy BP2: East																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+	+	+	0	++	+	++	-	+	+/-	+	+	+	0	0	+	+	+	++	+	++	+
<p>Social impacts are considered to be positive. Social inclusion will be increased and opportunities will be provided for everybody to live in a home which his suitable to their identified need through the potential residential development for Staples Corner Growth Area and Neasden Station's Growth Area, taking into account potential specific requirements around different housing types, such as specialist (older people / supported / student) housing and build to rent. Community identity will be supported through securing the retention of the area's religious buildings.</p> <p>Environmental impacts are considered to be positive. Attractive and clean environments will be enhanced through conserving and enhancing heritage assets such as Church Lane and Neasden Conservation Areas and improvements to public realm and connectivity in the town centres. The environment and open spaces will be enhanced through supporting the contribution of high quality open spaces and wildlife corridors, including maintaining and enhancing existing parks and groups and tree planting and associated landscaping around the North Circular Road / A5, and others.</p> <p>Economic impacts are considered to be positive due to encouraging efficient infrastructure to support economic growth by safeguarding land for the West London Orbital (WLO) Route and associated infrastructure and reducing traffic dominance on the A5 corridor and North Circular Road. Creation of high quality pedestrian connections from Brent Cross West Thameslink station to Staples Corner will reduce traffic dominance. Any new stations delivered as part of the WLO would have lift access, which would have positive impacts on protected groups with limited mobility, such as disability, age, and pregnancy and maternity. The policy also increases employment opportunities through supporting any additional small scale retail / other uses floorspace and retaining and encouraging intensification of employment uses at Kingsbury LSIS. In combination with other policies (e.g. BE1 – Economic Growth and Employment Opportunities for All – which seeks to secure Employment, Apprenticeship and Training Plans as part of developments of 3,000sqm or more), this could be particularly beneficial to particular under-represented protected groups (e.g. women, disabled people, BAME groups).</p> <p>Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. In particular, in relation to disability, directing development towards public transport corridors and safeguarding land for the WLO route is likely to have positive impacts in terms of accessibility.</p>																								

Conclusion: The proposed policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the East place of Brent.

Policy BP3: North

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	0	0	+	+	?	++	+	++	+	+

Social impacts are considered to be positive. The policy supports the continued residential development in the Burnt Oak and Colindale Growth Areas, which will encourage prosperity. Additionally, the policy will secure sufficient physical and social infrastructure to support the increase in population which will promote social inclusion and help to narrow inequalities within the borough. The policy will also improve health and wellbeing through identifying opportunities for a new leisure facility incorporating swimming pool provision and improve the quality of strategic sports hall sites.

Environmental impacts are considered to be positive. The policy will help to enhance and maintain attractive and clean environments and to protect and enhance the historic environment by way of conserving and enhancing designated heritage assets in the area, and ensuring that development respects the predominantly suburban low rise character of the area. The policy also supports improvements to public realm, building upgrades and shop façade improvements in Colindale / The Hyde and Burnt Oak. The policy supports enhancements to open spaces and creation of new public spaces, and aims to reduce traffic dominance and enhance A5 corridor, which will improve environmental health. Although the policy seeks to reduce traffic dominance, this will not have a negative impact on those who are reliant on cars (e.g. those with a disability) as higher car parking standards will still apply in areas with low PTAL ratings. Additionally, the policy aims to reduce traffic dominance partly through the creation of new cycling links between key destinations – by offering a greater variety of choice in how residents travel between key destinations, traffic dominance may be reduced, therefore leading to a positive impact on those who are still required to drive due to limited mobility.

Economic impacts are considered to be positive. The co-location of Capitol Valley and Honey Pot Lane LSIS will help to facilitate both indigenous and inward investment in the borough. Residential development within various locations at Kingsbury town centre will help to support its vitality and viability, and an increased net provision of comparison and convenience goods floorspace, directed towards the town centres will contribute towards the employment offer in the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North place of Brent.

Policy BP4 – North West																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	++	+	+	0	0	+	+	-	0	+/-	+	+	+	0	0	+	++	?	+	+	+	0	+
<p>Social impacts are considered to be positive. Housing delivery (being able to provide everybody with the opportunity to live in a home which is suitable to their identified needs) will be increased through the provision of approximately 2600 new homes including specialist accommodation to meet identified demand, and delivery of mixed-use development on the Sainsbury’s Kenton Road site. Health and wellbeing will be enhanced through the protecting and enhancing playing pitch provision and encouraging community use of Byron Court Primary School’s sports facility and improvements to the university hospital.</p> <p>Environmental impacts are considered to be predominantly positive. The policy will result in an improved setting of and better integration of open space within the site to Northwick Park, and will result in enhanced landscape and townscape through continuing to conserve and enhance designated heritage assets and protecting where possible the established metro-land characteristics of the place. Biodiversity will be conserved and enhanced through protecting and enhancing wildlife corridors and pursuing opportunities to create a local nature reserve at Ducker Pool. Improvements to Northwick park station and implementation of cycle ways will reduce traffic.</p> <p>Economic impacts are considered to be positive. The policy supports provision of enhanced or redeveloped university facilities, the creation of new convenience floorspace, and the retention and intensification of SIL Land at East Lane Business Park.</p> <p>Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.</p>																								

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North West place of Brent.

Policy BP5 – South																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	0	-/+	+	+	+	0	+	+	+	+	+	+	+	0	+
<p>Social impacts are predominantly positive. The policy proposes the extension of Church End Growth Area to include adjoining industrial sites to provide a mixed use neighbourhood, which will encourage prosperity and increase housing delivery. Church End town centre is also to provide a market for local communities, which will support social inclusion and community identity, and a new space within Church End Growth Area will serve as an employment, community and health hub, supporting health and wellbeing.</p> <p>Environmental impacts are predominantly positive. The policy proposes the conserving and enhancing of heritage and cultural assets and their setting, in particular that of Neasden Temple and Harlesden Conservation Area. This will help to maintain an attractive and clean environment and protect and enhance historic environments and cultural assets. Environmental enhancements will reduce flood risk, and enhancements to open space and prioritising tree planting in areas of poor air quality, particularly along the North Circular Road, will promote climate change adaption.</p> <p>Economic impacts are predominantly positive. The policy supports the engaging with the community of St Raphael’s Estate to develop a strategy as a potential area of change, to deliver more homes, thereby supporting resilient and inclusive economic growth. The policy also aims to protect and enhance Harlesden town centre’s retail and evening economy, including new convenience and comparison retail floorspace, supporting the local economy. Co-location of employment and residential uses at Church End LSIS, and encouragement of intensification of employment uses at Brentfield LSIS will facilitate both indigenous and inward investment within the borough. As will supporting the establishment of new Creative Quarters at Harlesden. A new 6th form entry secondary school and college will help to maximise education and skills.</p> <p>Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.</p>																								

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South place of Brent.

Policy BP6 – South East																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+
<p>Social impacts are considered to be predominantly positive. The policy promotes the delivery of 3400 high quality new homes in South Kilburn Growth Area, with a target of 50% affordable housing including social rented for existing secure tenants of South Kilburn. This will help to ensure that everybody is provided with an opportunity to live in a home which is suitable to their identified needs. The policy also promotes the securing of infrastructure in South Kilburn, including a new community space and enhancement and protection of leisure provision and playing pitches. This will increase community cohesion and health and wellbeing.</p> <p>Environmental impacts are considered to be predominantly positive. Safeguarding land for the West London Orbital Route will help to ensure that traffic can be reduced in the future. The enhancement of cycle links and to open space will also create beneficial environmental impacts.</p> <p>Economic impacts are considered to be predominantly positive. The policy proposes to protect and enhance the Queen’s Park Creative Quarter and South Kilburn Enterprise Hub, and to enhance and protect Kilburn Town Centre’s evening economy, which together will promote and protect employment opportunities.</p> <p>Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.</p>																								
<p>Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South East place of Brent.</p>																								

Policy BP7 – South West																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	+	0	+	+	?	+	+	+	+
<p>Social Impacts are considered to be predominantly positive. The policy supports a residential-led mixed use development within the Wembley and Alperton Growth Areas, the Ealing Road and Sudbury town centres and intensification corridors, which will help to encourage prosperity and increase housing delivery. The policy also proposes to meet social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities, which links into health and wellbeing and social inclusion.</p> <p>Environmental Impacts are considered to be predominantly positive. The policy proposes to conserve and enhance heritage assets, including the Shree Sanatan Hindu Mandir on Ealing Road and the listed buildings and gardens of Barham Park. The policy also promotes the creation of high quality open space as part of major developments, to be accessible to both new and existing communities, and prioritising public transport use and associated improvements in the Alperton and Wembley Growth Areas.</p> <p>Economic impacts are considered to be predominantly positive. The policy encourages the intensification of existing SIL and LSIS sites around Alperton, which will support investment in the borough, and also proposes to increase the supply of workspace in Wembley and Alperton, including affordable workspace, which will promote employment opportunities.</p> <p>Although the policy seeks to prioritise public transport use, this will not have a negative impact on those who are reliant on cars (e.g. those with a disability) as disabled parking standards in the London Plan will still apply. Additionally, by offering a greater variety of choice in how residents travel through the area, traffic dominance may be reduced, therefore leading to a positive impact on those who are still required to drive due to limited mobility.</p> <p>Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.</p>																								
<p>Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South West place of Brent.</p>																								

POLICY BD1: LEADING THE WAY IN GOOD URBAN DESIGN

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	+	+	+	+	n/a	n/a	+	n/a	+	+	+	+	n/a	n/a	n/a	+	n/a	+	n/a	n/a

Social impacts are overall considered to be positive. Good design will contribute towards ensuring that places function well, and that spaces around buildings contribute towards the public realm and community wellbeing. Good design will help ensure that people are put first, that health is promoted and that people feel safe and enjoy where they live, work, or visit. This links into promoting social inclusion, health and wellbeing, quality of surroundings, preventing crime and enhancing community safety, community identity and accessibility.

Environmental impacts are overall considered to be positive. High quality design will not only be visually interesting, but will enhance local character. High quality design will also help to enhance landscape and townscapes and enhance historic environments and cultural assets, and potentially mitigate and adapt to the impacts of climate change. Ensuring that places function well may reduce traffic by reducing the need to travel, and may help to minimise noise and light pollution.

Economic impacts are overall considered to be positive. High quality design will help to facilitate both indigenous and inward investment in the borough, as businesses may be more likely to utilise buildings which function well and where people feel safe to visit. Additionally, high quality design is more likely to be appreciated by future generations, and be sustainable, resilient and inclusive in terms of economic growth.

It is considered that there will be a positive impact on all of the protected groups: age, race, religion and belief, disability, pregnancy and maternity, marriage and civil partnership, gender reassignment, gender reassignment and sexual orientation. In relation to disability, the policy requires development to meet requirements within London Plan design policies and Brent Design Guide SPD1. Brent Design Guide SPD1 requires routes and spaces intended for the public to be open, public and fully accessible, while larger development sites should facilitate ease of movement and access for all. However, it is considered that all residents will benefit from a safe and welcoming local environment.

Conclusion: The proposed policy should provide benefits across the board by ensuring that buildings are of high quality and will be appreciated by future generations. High quality design is both visually interesting and will enhance local character. Additionally, good design will positively impact how places function and how the spaces around buildings contribute towards public realm and community wellbeing. Good design will therefore ensure that people feel safe and welcome, promoting health and wellbeing.

POLICY BD2: TALL BUILDINGS IN BRENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	+	+	0	0	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0

The policy will have minor positive impacts in relation to housing, quality of surroundings, town centres, traffic, and townscape and to heritage and cultural assets. The policy seeks to ensure that tall buildings are placed in the right location. Tall buildings will allow for increased densities in some areas and therefore provide the opportunity to better meet housing targets/ address needs. Placing the buildings in the right locations should maintain or enhance the majority of the townscape and quality of surroundings. Town centres are prioritised locations for taller buildings, so this should encourage better use of town centres. The prioritisation of taller buildings in areas with good public transport should reduce traffic. The placement of tall buildings in an appropriate context should ensure high quality environments are maintained and the appearance of the borough is maintained/ enhanced.

The policy will have neutral impacts on social inclusion, population diversity/ culture, health, homes that meet needs, community safety, accessibility, waste, bio-diversity and open spaces, water, soil, greenhouse gas emissions, climate change, flood risk, education and skills, infrastructure, growth and regeneration and investment and employment. Ensuring that tall buildings are located in the right places – such as within town centres – will help to ensure that services are accessible to all. Tall buildings have historically been associated with a number of adverse impacts and sometimes had negative connotations particularly in terms of their social outcomes for poorer households, related to social inclusion, isolation, lack of facilities and an increased perception of crime. Often this was related to their wider inclusion in predominantly poorly designed single tenure estates. More recently taller buildings have predominantly been market orientated, with a focus on smaller dwelling sizes in which families are not concentrated. They have better management of communal facilities, services and spaces which will remove some of the more negative outcomes that would have arisen previously. The identification of some areas as being appropriate for taller buildings will allow additional homes to be built to meet overall needs which will have positive impacts if people otherwise would not be able to access homes to meet their needs which would otherwise bring negative impacts. The policy for the most part however has a selective approach to the provision of taller homes, as such it is considered that overall the impact is likely to be neutral.

On age, race, sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. The policy identifies areas appropriate for tall buildings, this in itself is unlikely to significantly impact on those with protected characteristics, but is an important part of a wider strategy of seeking to deliver sufficient homes that meet the needs of residents. Other policies elsewhere in the plan consider impacts in relation to the total number of homes being delivered and in relation to accessibility – for example, BD1 requires good design, and the Brent Design Guide SPD1 requires new development to provide adequate space, access and orientation, while adhering to the relevant space standards.

Policy Alternative: To identify that no areas are acceptable for tall buildings.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	0	0	0	0	-	0	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0

The policy will have minor positive impacts in relation to health and well-being. The policy would not allow for tall buildings in any locations. This would potentially have minor impacts on health as generally people have higher levels of satisfaction with low to mid-rise development which is more of a human scale, whilst tall buildings can create an oppressive, closed in environment.

The policy would have minor negative impacts in relation to town centres/ accessibility, traffic and greenhouse gas emissions. The main negatives of no tall buildings would be associated with the reduction in densities that could occur in places with good accessibility to services and public transport, with the associated impacts on greenhouse gases associated with an increased reliance on the private car for journeys.

The policy will have neutral impacts on social inclusion, housing, quality of surroundings, community safety, population diversity, waste, culture, health, homes that meet needs, bio-diversity and open spaces, water, townscape, climate change, soil, flood risk, cultural assets, education and skills, infrastructure, growth and regeneration and investment and employment. It is assumed that housing numbers would need to still be delivered in an alternative form to tall buildings.

With regards to age, race, sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief, not having any areas within which tall buildings would be acceptable is likely to have a negative impact, particularly on those who may not be able to compete in the market and are more reliant on affordable housing

(old, young and disabled). Not having any areas which are appropriate for tall buildings would undermine an important part of a wider strategy of seeking to deliver sufficient homes that meet the needs of residents. These specific impacts have been assessed elsewhere in relation to those policies, e.g. total number of homes to be supplied.

Policy Alternative: To identify that tall buildings are likely to be acceptable throughout the borough.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	-	-	-	-	+	-	-	-	0	+	+	0	0	0	0	0	-

The policy will have positive impacts in relation to: biodiversity; land and soil; and open space. Identifying that tall buildings are likely to be acceptable through the borough will have some positive impacts. Such impacts include the increased likeliness of the development of more, high density tall buildings, which will require fewer sites to help achieve the borough’s housing targets. This approach will alleviate pressure on other sites, freeing up land otherwise allocated for development, including greenfield sites. Reduced development of greenfield sites will potentially increase biodiversity and soil conservation and increase the quantity of open spaces.

The policy approach will have negative impacts in relation to: social inclusion; health; housing; quality of surroundings; community safety; accessibility; traffic; waste management; water quality and resources; environmental health; townscape and landscape; heritage; climate change mitigation; and efficient infrastructure. This policy will likely lead to the development of higher levels of tall buildings, developed in inappropriate areas with low PTAL, increasing population densities in areas lacking sufficient infrastructure to cope. This will reduce people’s immediate accessibility to essential services such as healthcare facilities and will cause the increase in use of personal vehicles, as a means to acquire necessary goods and services and increasing traffic and associated pollution. Development in inappropriate settings which does not reflect local character will diminish the very nature of the area, urban grain, people’s sense of place and their pride in the area.

This policy will have neutral impacts on climate change adaption, flood risk, regeneration, employment, investment, and education.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. The policy would allow tall buildings anywhere in the borough. The wording in the policy in itself is unlikely to significantly impact on those with protected characteristics, but is an important part of a wider strategy of seeking to deliver sufficient homes that meet the needs of residents. In theory the provision of any site for a tall building could increase housing numbers sufficiently to meet needs. This

relationship is not however linear and the benefits might not necessarily pass through to those with protected characteristics as tall buildings due to economics do not always provide more affordable housing. As identified it might also locate buildings in areas without good access to public transport and services, thus adversely impacting on those who rely on public transport, or walking to local facilities. The specific impacts of providing more or less housing on those with protected characteristics been assessed elsewhere in relation to those policies, e.g. total number of homes to be supplied.

Conclusion: The proposed policy is seen as the most appropriate for Brent, having a number of positive impacts. Tall buildings will be required in order to help meet Brent’s housing needs due to the lack of available land. They can however have a number of negative impacts upon a community and therefore require tight control through policy. The proposed policy identifies a number of appropriate sites for the development of tall buildings in order to help meet the boroughs housing requirements and remains sufficiently flexible so as not to remain absolute. The alternative policies provide either too much, or too little control which will serve to negatively affect a number of social, environmental, and economic criteria.

Policy: POLICY BD3: BASEMENT DEVELOPMENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	+	+	0	0	0	0	-	0	0	+	+	0	0	0	0	0	+	0	0	0	0	0

The policy will have minor positive impacts in relation to health and well-being, housing, quality of surroundings, bio-diversity and open spaces, townscape and to flood risk. The policy recognises the increased demand for basements to meet homeowners’ needs in particular and seeks to allow this to happen whilst limiting the potential for significant adverse social and environmental impacts that might otherwise occur without a policy being in place. In relation to health making sure that households are not wholly reliant on the basement for all their living accommodation will reduce potential for adverse impacts re: lack of light and poor outlook and as such is a minor positive. The same is true of people being able to extend their homes so that they better meet their needs. Compared against an absence of policy, the limitation of extent of the allowed basements ensures that there are likely to be minor benefits in terms of the quality of surroundings, townscape and bio-diversity. The policy also seeks to ensure that potential impacts for flooding are addressed at the application stage to protect the occupants and neighbours.

There will be minor adverse impacts on waste production. The policy prevents extensive excavation which would further increase waste arising than the policy allows, but as basements usually involve the removal of significant volumes of soil under existing buildings what it allows will still have a minor negative impact.

The policy will have neutral impacts on social inclusion, population diversity/ culture, health, homes that meet needs, town centres, traffic, community safety, accessibility, water, soil, greenhouse gas emissions, cultural assets, climate change, education and skills, infrastructure, growth and regeneration and investment and employment. The extent of basement activity is likely to remain relatively small in the borough and probably only in very high value areas. As such the impacts are unlikely to be more than minor on many aspects with positive balancing up negatives, e.g. climate change, basements require much embodied energy in terms structural steel and concrete retaining walls, but the underground location can reduce fluctuations in temperature and heating/cooling requirements compared to conventional extensions.

On age, race, pregnancy and maternity and disability the policy is likely to have a positive impact, on sexual orientation, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. The policy provides for basement extensions. This is likely to be positive for those who need to extend their home to meet their needs, this may be for larger families (more prevalent within ethnic minorities) those with small homes but having children, those needing additional room for carers (old and disabled).

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	-	-	-	0	0	0	0	?	0	0	?	?	0	0	0	0	0	?	0	0	0	0	0

Not having a policy to manage basement extensions is likely to have a minor negative impact in terms of the social indicators. The lack of a policy means that there will not be an opportunity to limit the potential for significant adverse social and environmental impacts that might otherwise occur with a policy being in place. This could be due to people not being able to extend their homes to better meet their needs. Alternatively, it may result in households being wholly reliant on a basement for their living accommodation.

The lack of a policy will have uncertain impacts in terms of environmental indicators. There will not be an opportunity to limit the potential for significant adverse environmental impacts that might occur with a policy being in place to prevent such impacts. There will also be uncertain impacts with regards to waste production, as basements usually involve the removal of significant volumes of soil under existing buildings.

The lack of a policy will have neutral impacts in terms of economic indicators.

On age, race, pregnancy and maternity and disability the policy is likely to have a negative impact, on sexual orientation, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. Not having a policy to provide for basement extensions is likely to negatively impact those who need to extend their home to meet their needs, such as larger families (more prevalent within ethnic minorities), those with small homes but having children, and those needing additional rooms for carers (old and disabled). It might also ensure that those with a protected characteristic that results in them being economically disadvantaged will be living in cheaper accommodation that has all its habitable rooms at basement level.

Alternative Policy: Allowing greater extent of basement extensions within the property curtilage

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	+	-	0	0	0	0	-	0	0	+	+	0	0	0	0	0	+	0	0	0	0	0

The policy will have minor positive impacts in relation to health and well-being, housing and to flood risk. This approach would be a variant on the preferred policy. As such it recognises the increased demand for basements to meet home owners' needs. It seeks to allow larger basements than the preferred policy, limiting some of the potential adverse social and environmental impacts that might otherwise occur without a policy being in place. In relation to health making sure that households are not wholly reliant on the basement for all their living accommodation will reduce potential for adverse impacts re: lack of light and poor outlook and as such is a minor positive. The same is true of people being able to extend their homes so that they better meet their needs. The policy also seeks to ensure that potential impacts for flooding are addressed at the application stage to protect the occupants and neighbours.

There will be minor adverse impacts on quality of surroundings, waste production and bio-diversity and open spaces, townscape. The policy allows for more extensive excavation which would further increase waste arising. As basements usually involve the removal of significant volumes of soil under existing buildings it will have a minor negative impact as basement extensions are not significant in terms of numbers in the borough. Less restriction on the extent of the allowed basements creates a scenario which could well mean minor adverse impacts in terms of the quality of surroundings, townscape and bio-diversity, as there will be less space for green infrastructure and potentially visible changes to the character of the street scene.

The policy will have neutral impacts on social inclusion, population diversity/ culture, health, homes that meet needs, town centres, traffic, community safety, accessibility, water, soil, greenhouse gas emissions, cultural assets, climate change, education and skills, infrastructure, growth and regeneration and investment and employment. The extent of basement activity is likely to remain relatively small in the borough and probably only in very high value areas. As such the impacts are unlikely to be more than minor on many aspects with positive balancing up negatives, e.g. climate change, basements require much embodied energy in terms

structural steel and concrete retaining walls, but the underground location can reduce fluctuations in temperature and heating/cooling requirements compared to conventional extensions.

On age, race, pregnancy and maternity and disability the policy is likely to have a positive impact, on sexual orientation, sex, marriage and civil partnership, gender reassignment and religion and belief the policy is not likely to have a neutral impact on those with a protected characteristic compared to the rest of the population. The policy would provide for much larger basement extensions, meaning that possibly more residents would be able to stay in their existing homes and meet their needs through extending. This is likely to be positive for those who need to extend their home to meet their needs, this may be for larger families (more prevalent within ethnic minorities) those with small homes but having children, those needing additional room for carers (old and disabled).

Conclusion: The Assessment indicates that the preferred policy has slightly more positive impacts than the reasonable alternative of allowing a greater volume of basement development to occur. It allows property owners greater scope for the property to be adapted to meet their needs, whilst balancing that up against the impacts on neighbours, particularly in terms of character and green infrastructure.

Housing

Policy: BH1 INCREASING HOUSING SUPPLY IN BRENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	?	?	?	?	-	-	?	-	?	?	?	-	-	?	+	+	+	?	+	+	?

Although not exclusively for Brent residents provision of significantly more homes in the borough will have positive impacts in relation to social inclusion, health and well-being, living in a home which needs, open space, flooding, economic growth, indigenous and inward investment, maximise population's economic potential. For example, it will address issues of people being placed in temporary accommodation, overcrowding and accommodation which is too expensive and in some cases eliminates potential available disposable income, with the associated adverse impacts on life chances. This will serve to increase opportunities for those most vulnerable within the borough, acting to reduce any differential between those who share a protected characteristic and those who do not. More homes at more affordable prices will assist the economy by limiting wage inflation, allowing more employees to live nearer to work, support existing and new firms' investment in the area and provide training opportunities/ apprenticeships in the building trade for local people. Wholesale changes to areas through master-planning or appropriate planning permissions should provide more opportunities for provision of more formal open space on current brownfield land covered by buildings. It should allow investment in existing open spaces through developer contributions, which in some cases are under-used and reduce surface water run-off which previously hasn't been controlled to greenfield run-off rates.

Impacts will be uncertain in relation to the environment, community safety, recognising Brent's diversity, the vitality and viability of town centres, bio-diversity, townscape, historic and cultural assets, water quality and resources, flora and fauna, landscape and townscape, historic environment and cultural assets, soil quality, local employment, infrastructure to support growth. The limited availability of land in Brent will however potentially impact in both positive and negative ways, with overall uncertain outcomes in relation to a number of aspects. Whilst the need to build homes will mean investment in the existing built environment, which will be positive in dealing with run-down or derelict sites including those of an historic nature, intensification of land use will result in higher plot ratios. This will increase either buildings' site coverage and/ or heights, reducing space for green infrastructure and potentially increasing perceptions of development not of a human scale and of an increased feeling of enclosure. Whilst interventions such as including on site green infrastructure might overcome some impacts, it is difficult to know whether these will be able to fully compensate for undeveloped space lost. Pressure to use land to a greater extent and the economic value of homes could displace more economically marginal uses, such as cultural assets, or business premises, etc., which might not be overcome by policies which seek to seek re-provision, or new facilities.

It is likely to have adverse impacts on reducing the effect of traffic on the environment, reducing the production of waste, air quality, reducing greenhouse gas emissions and mitigating climate change. Again whilst other policies will help to reduce the potential for adverse impacts, additional housing against a backdrop of overall population growth will probably result in these adverse impacts. Increased traffic is likely as not all development will be in areas with high public transport accessibility, construction is a significant contributor of waste even when reusing properties, homes will require energy to function, even if it is less than traditionally consumed and increased buildings will increase temperatures due to their increased thermal mass.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics compared to the wider population: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. At a general level the provision of additional homes is more likely to allow those with protected characteristics to better meet their needs, as it will provide more choice and possibly result in reductions in costs of property. This could benefit those with protected characteristics who often do not have the purchasing power of others, but will more likely rely on other policies in the plan to ensure that targeted needs, such as affordable housing, mobility housing, specialist housing and family housing are provided. For those with the protected characteristics of age, pregnancy and maternity and disability, impacts on accessibility and car parking would be considered under other policies (design policies, parking policies, and London Plan policies).

Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	-	?	-	?	-
<p>Impacts are uncertain in relation so social indicators, but are likely to be negative. Not only is not having a policy inappropriate as this would not be in general conformity with the London Plan, not having a policy means that opportunities to provide housing for those in temporary or unsuitable accommodation will not be maximised. Additionally, a lack of a policy means that opportunities will not be maximised to provide affordable housing, or homes to be provided in the right places.</p> <p>Impacts are uncertain in relation to environmental indicators. Without a policy to outline the borough’s approach to the amount of housing to be delivered, it is not possible to determine the impacts on the environment. However, it is possible that not planning for the right homes in the right places would have a negative impact due to increased traffic (if development is located in areas with poor public transport accessibility).</p> <p>Impacts are uncertain in relation to economic indicators. Without a policy to outline the borough’s approach to increasing housing supply, it cannot be determined what the economic impacts would be. However, economic impacts are likely to be negative, as a lack of planning for housing in the right places is likely to increase housing costs, which will increase wage demands, or reduce the opportunity for firms to source local employees, detrimentally impacting on economic investment and promotion of sustainable, inclusive economic growth in the borough. Additionally, a lack of a policy will make it difficult to encourage efficient infrastructure to support economic growth.</p> <p>It is considered that the lack of a policy around increasing housing supply in Brent would have uncertain impacts on all residents. It is possible, however, that this option could detrimentally impact those with protected characteristics who do not have the purchasing power of others and who may be reliant on other policies in the plan to ensure that targeted needs, such as affordable housing and specialist housing are provided.</p> <p>Not having a policy is not considered to be an option, as it would not be in general conformity with the London Plan.</p>																								
Alternative Policy: To achieve a housing target as set out in the draft London Plan																								

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	?	?	?	?	-	+	?	-	-	-	-	-	-	-	-	-	-	-	?	?	+	+	?
<p>Impacts will be positive in relation to social inclusion, accessibility, investment, education. This is primarily due to the provision of more housing which means there will be more investment within the borough, providing more construction related jobs. The increased provision of affordable housing is likely to disproportionately benefit those from certain sub-groups, helping to further level the playing field. The increased housing densities will also increase footfall in town centres, increasing their viability whilst providing greater proximity to social infrastructure.</p> <p>Impacts will be negative in relation to community identity, waste management, water quality, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open space, flood risk. Negative impacts are in regards to increased construction works, having an overall negative impact on the environment due to the increased demand for land that displaces other uses, need for increased resources and increasing pollution. They also relate to the speed and intensity of development, for instance, associated infrastructure such as sewer capacity may not be able to keep pace with development. There would also be an increasing reliance on tall buildings for housing which may focus upon the development of 1 and 2 bed apartments in order to attain housing numbers due to less space being required for their delivery, with associated impacts on health and townscape. More homes mean more waste both in construction and in on-going occupation, more water demand/ waste water, potential sewage overflows. Higher targets will also put greater pressure on existing undeveloped areas within property curtilages, impacting on the quality of the environment/ biodiversity.</p> <p>Impacts will be uncertain with regards to health, housing, quality of surroundings, community safety, regeneration, employment, and infrastructure. It will take a great effort from both councils and developers to achieve the substantially larger housing targets set out in the draft London plan. This may result in neglect of other considerations, or their being outpaced, such as development of supporting infrastructure and better consideration of design. The policy may also result in the reduced diversity of housing type as the focus will be on attaining large quantities of dwellings, which will be best achieved through the provision of smaller, 1 and 2 bed units. This may impact upon the provision of housing for those with specialist needs, potentially exacerbating any inequalities felt by those with particular protected characteristics. Increased densities may also make for greater collaborative efforts and an increase in footfall in town centres, increasing their viability, whilst improved activity may reduce the fear of crime, the increased number of people might increase actual incidences of crime.</p>																								

It is considered that this policy will have a neutral impact on people who have the following protected characteristics compared to the wider population: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. At a general level the provision of additional homes is more likely to allow those with protected characteristics to better meet their needs, as it will provide more choice and possibly result in reductions in costs of property. This could benefit those with protected characteristics who often do not have the purchasing power of others, but will more likely rely on other policies in the plan to ensure that targeted needs, such as affordable housing, mobility housing, specialist housing and family housing are provided. On the other hand, those with protected characteristics that make them economically disadvantaged may be more likely to be located in housing that is not close to public transport and amenities. Larger households might also be displaced through single family homes being redeveloped for additional smaller properties.

Alternative Policy: To only identify a housing figure to 2029

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	-	0	?	?	0	-	-	0	?	0	0	-	-	-	0	0	0	0	-	0	0	0	0

This policy approach will have negative impacts in relation to: health; accessibility; traffic; landscape and townscape; heritage; climate change mitigation; and regeneration. These impacts are associated with the reduced planning period which lessens the councils, and developer foresight. Over the long term this equates to a piecemeal approach with associated compounded impacts such as increased traffic and reduced understanding of infrastructural requirements. This will impact upon the realisation of long term plans such as the implementation of community combined heat and power systems, affecting climate change mitigation, and also the design and layout of the townscape. This approach may also impact upon developer interest, reducing their likelihood to invest in the borough due to a lack of a long term plan with which they can get on board with.

It is uncertain as to whether the policy approach will impact social inclusion, quality of surroundings, community safety, waste management, water quality and resources. The ability of the council to create a sense of place may be impaired due to the shorter time scale. This may also affect the general building design of the developments which are approved due to a decreased timescale to meet overall housing targets. Reducing the timescale for housing deployment may impact the ability of waste management efforts to foresee future trends and therefore may lack the necessary capacity come 2029 when policy changes.

The policy is seen to have a neutral impact upon housing, community identity, waste, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, employment, investment, education, and efficient infrastructure.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics compared to the wider population: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. At a general level the provision of additional homes is more likely to allow those with protected characteristics to better meet their needs, as it will provide more choice and possibly result in reductions in costs of property. This could benefit those with protected characteristics who often do not have the purchasing power of others, but will more likely rely on other policies in the plan to ensure that targeted needs, such as affordable housing, mobility housing, specialist housing and family housing are provided. After the period to 2029 however it will result in increased uncertainty if housing needs can be met as it often takes a long time for sites identified for housing to be delivered. It might also reduce the opportunity to plan on a larger scale which will in some cases reduce the economies of scale of a development, thus impacting on its ability to provide the necessary social infrastructure in a timely manner.

Conclusion: The proposed policy performs better across a wider range of indicators than the alternatives that are proposed, although the provision of housing undoubtedly has the potential for negative impacts around environmental matters, particularly use of resources, waste, etc. These matters can be reduced through other policies in the development plan, but ultimately cannot overcome what will be a use of finite resources.

Policy: BH2 PRIORITY AREAS FOR ADDITIONAL HOUSING PROVISION WITHIN BRENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	?	?	?	?	+	+	-	0	-	+	+	?	+	+	+	?	+	+	+	+	+	?

The policy will have positive impacts in relation to: addressing poverty; health and well-being; maintaining role and function of town centres; transport; bio-diversity, townscape, climate change, land and soil, flood risk, economic growth, employment and inward investment and education and skills. The concentration of development in areas with good accessibility to public transport and local shops and facilities will have a number of positive impacts for residents and those areas, such as making access to services easier for those who cannot afford to travel, reducing reliance on the car and its use, thus encouraging walking/ cycling, reducing the potential for negative impacts on climate change, with the increase in population helping to support greater use of shops and facilities in town centres. Ease of access to goods and services, including public transport links, is particularly important for those who are disabled, enabling them to more easily fulfil their requirements, helping to close the gap between their opportunities and those who do not share this characteristic. Focusing on existing developed areas will be beneficial for bio-diversity, land and soil, diverting development away from low intensity developed land/ green spaces. Investment in corridors/ under-used sites will improve townscape, these areas historically are outside the

floodplain, so new development will avoid areas of higher flood risk, whilst the regeneration of town centres and existing employment areas in particular aligned with policies to re-provide employment space will improve economic growth, employment space/ opportunities and thus encourage opportunities for inward investment and provide opportunities for people to have better access to training either in their area or by access to public transport to get to it.

The policy will have neutral impacts on water quality and noise and air pollution. Whilst such areas are likely to be away from water bodies and incorporate SUDs to reduce run-off, there may be a reliance on combined sewers, particularly in the south which could take up the capacity freed up through reduced run-off with sewage. The concentration of development in areas of high public transport will reduce vehicle use/ improve air quality compared to a more dispersed pattern, nevertheless concentration of homes in areas/ movement corridors potentially increases people's exposure prior to the movement towards low or no emissions vehicles to higher concentrations of poor air quality and also noise pollution associated with traffic and activity.

The policy will have negative impacts on waste and recycling. The intensification of development through its delivery in higher density schemes associated with these locations is likely to reduce household recycling amounts. Higher density dwellings, particularly flats with communal waste facilities have much lower rates of recycling than lower density homes where there is more space to separate items.

The policy will have uncertain impacts in relation to providing everyone with the opportunity to live in a home which meets their identified needs, enhancing community safety, community identity, historic assets, open space and reduce commuting. The locations generally are associated with higher density developments. Such areas generally produce lower proportions of larger family homes due to market and design matters, although increases in densities in all locations are leading to such pressures. Whilst higher density can be designed to reduce the potential for crime through provided for more overlooked places, areas with concentrated populations, or living in town centres will expose more people to the potential to witness crime/ perceive higher levels of crime, so whilst crime might be lower, perceptions might be that its higher. The placing of homes in areas of existing high character, e.g. town centres or creating new character, e.g. growth areas could assist in increasing community identity, higher densities however could reduce opportunities for neighbourly interactions, affecting cohesion. Whilst there will be protection and enhancement of designated heritage assets, there is the potential for existing character of areas to be changed significantly. In relation to open space, concentration of development will reduce pressure to develop on open spaces, nevertheless higher density development will limit potential for large spaces to be incorporated and might mean people have to travel longer distances to get to them. In relation to commuting and business infrastructure mixing uses has the potential to reduce commuting, but providing easy access to public transport also has the potential to increase it, whilst the same is true for business, opportunities for closer links could improve opportunities for business, but concentration means potential congestion which could impact on productivity.

It is considered that this policy will have positive effects on people who have the following protected characteristics compared to the wider population: age, gender reassignment, race and sex. Those at opposite ends of the age spectrum (young and old), women, those with a disability, pregnancy and maternity, gender reassignment, race are more like to have lower incomes than the general population and therefore have limited access to private vehicles and so will be more reliant on public transport and walking, which means facilities will need to be nearer. The prioritisation of homes in areas that have access to good public transport, facilities and social infrastructure will probably assist these groups. **It is considered that the policy could have a mixed impact on disability and pregnancy and maternity.** Concentration of homes in areas / movement corridors may potentially in the short to medium term increase people’s exposure to higher concentrations of poor air quality, which may have a negative impact on pregnant women and disabled people. However, these particular protected characteristics are more likely to have lower incomes, and will therefore have limited access to private vehicles and be more reliant on public transport – as such, prioritisation of homes in these particular areas will assist these groups. Impacts are therefore mixed. For the other protected characteristics there are unlikely to be differential impacts compared to the general population. **The policy will have a neutral impact on marriage and civil partnership, religion and belief and sexual orientation.**

Alternative: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	?	?	?	-	-	+	0	-	?	?	?	-	-	?	-	-	-	-	-	-	-

Impacts are likely to be negative in relation to social indicators. Not being able to concentrate development in priority areas will mean that development will not be concentrated in areas with good accessibility to public transport and local shops and facilities.

Impacts are likely to be mixed in terms of environmental indicators. Not being able to concentrate development in areas of high public transport will mean that vehicle use will not be able to be reduced as much as if development were to be concentrated in specific areas. A lack of concentration of development may also have a negative impact in terms of pressure to develop on open spaces. However, impacts may be negative in terms of waste and recycling, as higher density dwellings have much lower rates of recycling than lower density homes where there is more space to separate items.

Impacts are likely to be negative in relation to economic indicators. Not being able to prioritise specific areas for additional housing provision within Brent is likely to result in difficulties in terms of promotion of regeneration, facilitating investment in the borough and facilitating sustainable, resilient economic growth.

The council wants to provide for and meet its housing delivery requirements, and as such identifying new sites where new homes are considered appropriate is necessary.

It is considered that this policy will have negative impacts on people who have the following protected characteristics compared to the wider population: age, disability, pregnancy and maternity, gender reassignment, race and sex. Those at opposite ends of the age spectrum (young and old), women, those with a disability, pregnancy and maternity, gender reassignment, race are more like to have lower incomes than the general population and therefore have limited access to private vehicles and so will be more reliant on public transport and walking, which means facilities will need to be nearer. The lack of a policy to prioritise homes in areas that have access to good public transport, facilities and social infrastructure is likely to negatively impact these groups. For the other protected characteristics there is unlikely to be differential impacts compared to the general population. **The policy will have a neutral impact on marriage and civil partnership, religion and belief and sexual orientation.**

Alternative Policy: To extend the scope of the policy so that it potentially captures more sites.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	-	+	+	+	0	-	-	-	-	-	+	+	-	-	+	+	+	+	-	+	-	-	0

This policy approach will have a positive impact on: social inclusion; housing; quality of surroundings; community safety; biodiversity; landscape and townscape; climate change adaption; land and soil; open space; flood risk; and employment. Firstly, capturing more sites for housing development will generally ensure a greater level of delivery, increasing housing provision and affordability in the same stride. This will serve to disproportionately benefit those who have particular protected characteristics helping to increase equality, improving social inclusion and cohesion. This increase in development will bring with it greater receipts of CIL helping to improve the public domain and local infrastructure. Regeneration will also be of higher quality than existing infrastructure, especially in terms of climate change adaption with development design taking this into consideration to a much greater extent than older developments would have.

This policy approach will have negative impacts in relation to: health; traffic; waste management; water quality and resources; environmental health; heritage; accessibility; climate change mitigation; regeneration; investment; and education. These impacts are associated with an increase in development of lower PTAL areas, increasing car dependence, traffic congestion and associated reduction in air quality. Although this policy will likely lead to an increase in development, it will also cause a decrease in its density, reducing our ability to concentrate efforts in any given area, reducing development within town centres and its associated viability. This is

exacerbated by the likely development in lower PTAL areas, away from town centres, reducing residents' association with local centres and increasing their likelihood of traveling to more distant centres, reducing their sense of place, local town centre viability and investment in the process. With populations being spread more thinly, this will also have an impact upon social infrastructure provision, having to provide more infrastructure as opposed to creating a critical mass which serves the wider public. They also stem from the policies likely impact upon increased development which will increase pollution levels and the strain on associated infrastructure, such as sewer capacity and water provision. Also, town centres have generally evolved from historic sites and as such contain more heritage assets. Increasing the density of development within these areas therefore poses a potential risk to these assets.

The policy approach will have neutral impacts on community identity and efficient infrastructure.

The policy will have a neutral impact on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The widening of the policy would potentially allow more people to access new homes which could possibly be delivered at a greater rate than compared to prioritisation of homes in smaller areas. The benefits of this could well however be off set against the potential for more difficulty to access good public transport, and local facilities and social.

Alternative Policy: To further reduce the scope of the policy by not requiring re-provision of non-residential floorspace in any circumstance

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	?	-	-	-	-	-	0	0	-	0	-	-	-	0	?	0	0	-	-	-	-	-

This policy approach will have negative impacts on: social inclusion; health; quality of surroundings; community safety; community identity; accessibility; traffic; environmental health; landscape and townscape; heritage; climate change mitigation; regeneration; employment,; investment, education, infrastructure. Much of these negative impacts stem from the reduction in non-residential floorspace which serves to reduce local facilities and essential infrastructure, lowering levels of local jobs and accessibility to services. This in turn increases levels of transport in the effort to attain essential services and job employment opportunities which potentially increases car dependency and associated carbon emissions. This reduction in non-residential floorspace of all kinds will be of detriment to the local sense of place, reducing access to community facilities and directly impairing people's ability to partake in cultural practices. This will also cause the reduction in town centre viability, decreasing footfall within the area and with it the associated passive surveillance, leading to increasing levels of crime. These impacts are likely to disproportionately affect those from particular social sub-groups and those with protected characteristics, serving to increase inequalities within the borough.

The policy is seen to have a neutral impact on waste management, resources, climate change adaption, open spaces, and flood risk.

The policy is likely to have a combination of positive, neutral and negative impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The reduction of the need to re-provide non-residential would potentially allow more people to access new homes as the space reserved for other uses would become available for more residential development. The benefits of this could well however be off set against the potential for more difficulty to access the uses that would have been displaced particularly for those reliant on public transport, walking and cycling.

Conclusion The proposed policy performs better across a wider range of indicators than the alternatives that are proposed. The scope of the proposed policy strikes a balance between the positives of increased housing and the negatives of increased environmental pressure, and is in favour of sustainable development. By increasing the scope of the proposed policy further to capture more sites, the policy has the effect of increasing development within areas of low PTAL, increasing car dependence, whereas the proposed policy seeks to incur development within areas of high PTAL, negating this potential negative impact. To reduce the scope of the policy to not include the re-provision of non-residential floorspace would be of detriment to the local sense of place, negatively impacting a range of social criteria and reducing town centre viability and access to local jobs, and accessibility to services by those with limited mobility. Whilst non-provision might open up more opportunities for ground floor dwellings which become available to those with mobility issues, often this accommodation would be within busy streets at the pavement's edge and therefore might be compromised in terms of its amenity to provide a high quality residential environment.

Policy: BH3 BUILD TO RENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0

The policy will have minor positive impacts in relation to social inclusion, homes to meet needs, business and inward investment. The incorporation of private rented will assist to some extent in addressing social inclusion by potentially providing a better market rented product compared to that offered by some small scale landlords, and in terms of meeting needs might better address those who are unable to buy properties but able to rent. This may also serve to increase the availability of specialty housing such as those designed for disabled residents, raising them up from potentially compromised living conditions and providing them with greater power of choice. Provision of additional rented properties will allow for a more flexible workforce able to move to work opportunities quicker/ easier and thus potentially increase inward investment by businesses.

The policy will have neutral impacts compared to the provision to housing for sale on health, high quality environment, community safety, diversity, accessibility, traffic, waste, water, environmental health, townscape, historic environment, climate change, soil, open space, flood risk, employment opportunities, education and skills and infrastructure. There is unlikely to be a significant differentiation between build to rent and owner-occupation led housing on these matters.

The policy is likely to have a mix of positive, neutral and negative impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The policy could have a positive impact on disabled groups by way of potentially raising them up from compromised living conditions by providing greater power of choice.

The provision of rental properties is part of a wider attempt to increase the overall volume of dwellings built. As such it might have a positive impact on some of those with protected characteristics who are currently unable to meet their housing needs in the open market, but who have the purchasing power to attain solutions if capacity was available. For those who are unable to afford market dwellings, some affordable housing will be provided with these dwellings, but the amount of affordable dwellings and discount on rents is in many cases likely to be lower than that delivered in association with conventional housing, meaning that benefits to those who might have less ability to have choices due to limited incomes (more likely to be the young/old, disabled, pregnant/ maternity, females, gender reassigned and race) is uncertain. Overall, it is likely to increase the amount of affordable homes delivered, however the rents on these properties are in the majority of cases likely to be higher than the affordable housing provided in conventional housing schemes.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0

Not having a policy regarding build to rent is likely to have a minor negative impact in terms of social indicators. The incorporation of private rented would assist to some extent in addressing social inclusion by potentially providing a better market rented product compared to that offered by some small scale landlords, and in terms of meeting needs might better address those who are unable to buy properties but able to rent. This could also serve to increase the availability of specialty housing such as those designed for disabled residents, raising them up from potentially compromised living conditions and providing them with greater power of choice. Not having a policy to encourage such provision may therefore have a detrimental impact in this regard.

Not having a policy will have a neutral impact in terms environmental indicators. There is unlikely to be a significant differentiation between build to rent and owner-occupation led housing on these matters.

Not having a policy will have a mainly neutral impact in terms of economic indicators. However, lack of provision of additional rented properties means that fewer opportunities may be provided allowing for a more flexible workforce, which could potentially increase inward investment by businesses.

Not having a policy regarding Build to Rent is not considered to be appropriate, as this would not be consistent with the desire of Government and the GLA to support the identification of additional sites to assist with the delivery of build-to-rent properties and increasing housing delivery overall.

The policy is likely to have a neutral impact on the protected characteristics of age, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The lack of a policy could have a negative impact on disabled groups by way of not making use of an opportunity to raise this group from compromised living conditions by providing greater power of choice. Assuming that the exclusion of a policy would reduce overall housing delivery, this could reduce the provision of dwellings/ affordable dwellings overall, having said that much of the affordable housing is unlikely to be affordable to those on the lowest incomes without housing benefit support.

Alternative Policy: To extend the scope of the policy so that it captures more sites, or a minimum amount of the development that should be Build to Rent

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	+

This policy approach will have positive impacts on: social inclusion; housing; regeneration; employment; investment; and efficient infrastructure. Increased levels of rented accommodation, and their variety in type, which may increase market competition leading to a better, more affordable product for residents. By improving choice, affordability and availability, this policy will increase the life chances of those most economically disadvantaged within the borough, helping to reduce the inequalities suffered by those with specific protected characteristics, improving social relations overall. The provision of more rented accommodation will also serve to provide a more flexible work force which will encourage new start-ups and increase economic resilience. This flexibility in accommodation should help to reduce long/short term unemployment through increased power of choice. This should also serve to reduce the levels of commuting as people have more options in terms of location of accommodation and therefore can choose to live nearer to work.

This policy approach will have negative impacts on: community safety and community identity. For instance, by reducing the levels of home ownership on a site, this policy may inadvertently increase levels of crime. Also, increased levels of rent may reduce resident's average lengths of stay in any one place which has potential to reduce a person's sense of place and ability to develop long term local relationships and therefore their likelihood of attempting to interact with one another and therefore does not serve to help foster relationships between different social demographics.

The policy will have neutral impacts on well-being, quality of surroundings, accessibility, traffic, waste management, water, environmental health, townscape, historic environment, climate change, soil, open space, flood risk, and education.

The impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation are unclear. The provision of rental properties is part of a wider attempt to increase the overall volume of dwellings built. Build to rent operates a different funding model, meaning if part of a wider development it can also affect viability of development of market housing and associated affordable housing provided. This could impact of the delivery of these tenures meaning different impacts, either by for instance reducing the proportion of affordable housing or the tenure of the affordable housing. As such it might have a positive impact on some of those with protected characteristics who are currently unable to meet their housing needs in the open market, but who have the purchasing power to attain market rented solutions if capacity was available. For those who are unable to afford market dwellings, (more likely to be the young/old, disabled, pregnant/ maternity, females, gender reassigned and black and minority ethnic groups) it could well reduce the potential for their needs to be met through development.

Alternative Policy: To further reduce the scope of the policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	0	0	-	-	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0

The policy is likely to negatively impact social inclusion, well-being, housing, community identity, accessibility, growth, and employment. This policy will reduce people's ability to find homes which meet their individual needs, decreasing their accessibility to key services and their ability to participate in society effectively, negatively affecting their employment opportunities. This will impact upon individual well-being and the likelihood that people from different backgrounds interact, reducing the sense of place and community, and the spread of culture and perspectives, particularly between those with protected characteristics and those without.

The policy will have neutral impacts upon quality of surroundings, crime, traffic, waste, water, environmental health, townscape, historic environment, climate change, soil, open space, flood risk, investment, education, and efficient infrastructure.

The impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation are unclear. The provision of rental properties is part of a wider attempt to increase the overall volume of dwellings built. Reducing its potential to be delivered is likely to adversely impact on those with protected characteristics who are currently unable to meet their housing needs in the open market, but who have the purchasing power to attain market rented solutions if capacity was available. For those who are unable to afford market dwellings, (more likely to be the young/old, disabled, pregnant/maternity, females, gender reassigned and black and minority ethnic groups) it could have mixed results, resulting in fewer affordable dwellings being built overall, but it could be that these dwellings are more affordable and therefore of better meet needs for the most vulnerable compared to more affordable dwellings which are less affordable to occupants, increasing the potential for debt and other associated issues.

Conclusion: The current proposed policy best reflects the boroughs needs, scoring positively on a number of criteria without incurring any measurable negative impacts. Increasing levels of rented accommodation is not seen to differentiate in its environmental impact with those built to own. Increasing rented accommodation to this extent will ensure a mixed tenure, increasing communications between people from different backgrounds and increasing the flexibility of workers through greater power of choice. Reducing the scope of the policy would serve to decrease competition within the rented sector, reducing living conditions for residents, negatively impacting a range of social and economic criteria.

Policy: BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	0	0	+	+	0	0	+	0	0	0	+	0	0	0	0	0	0	0	0	0

The policy will have minor positive impacts in relation to social inclusion, homes that meet needs, accessibility, traffic, air pollution, greenhouse gas emissions. Whilst the policy might marginally reduce the number of homes delivered compared to the London Plan policy which will impact on the ability of people to access homes that meet their needs, the emphasis on ensuring that the dwellings have good access to public transport will provide homes that better meet the needs of those with no private transport, those who may be unable to drive due to a disability, or who require access to facilities, such as those who are physically disabled, increasing their opportunities. This will produce benefits in terms of reducing reliance on the private car and therefore associated traffic generation, air pollution and greenhouse gases.

The policy will have neutral impacts on health, high quality environment, community safety, diversity, waste, water, townscape, historic environment, climate change, soil, open space, flood risk, employment opportunities, education and skills and infrastructure. Whilst areas that benefit from higher levels of public transport accessibility are more likely to have been developed more densely than lower suburban areas, they also are usually more historic in their character as they have been along main travel corridors. Increased development in these areas could potentially impact on character whilst giving greater likelihood of the character of lower PTAL areas remaining unchanged. In relation to impacts on other objectives there is unlikely to be significant differentiation between homes in PTAL 3-6 and PTAL 0-2 on these matters.

There will be a positive impact on the following groups: age, disability, pregnancy and maternity, sex, gender reassignment and race, as the young / old, disabled, pregnant and on maternity leave, female, gender reassigned and black and minority ethnic groups are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity to greater access to facilities. **There will be a mixed / unclear impact on all other protected groups (religion and belief, sexual orientation and marriage and civil partnership).** This is because the policy could reduce the potential delivery of homes on small sites due to small sites being focused in locations with genuine reasonable public transport alternatives. This could be to the detriment of those in housing need.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	0	0	0	0	-	0	0	-	0	0	0	-	0	0	0	0	0	0	0	0	0

Not having a policy will have mainly neutral impacts, but some negative impacts in terms of social indicators. Not having a policy to ensure that proposals to increase density of existing residential homes within only PTAL 3-6 locations may result in development being encouraged in areas of high car dependency, which could result in a reduced quality of life for existing residents. Not having such a policy will mean that it cannot be ensured that dwellings have good access to public transport to provide homes that meet the needs of those who require access to facilities.

Not having a policy will have mainly neutral impacts, but some negative impacts in terms of environmental indicators. As noted above, not restricting residential extensions (in terms of small sites and small housing developments in Brent) to homes within a PTAL of 3-6 may result in increased development within areas of high car dependency (such as sites within an 800m buffer of a town centre, but with poor physical links to that centre). This could have a negative impact on air quality and traffic generation.

Not having a policy will have a neutral impact in terms of economic indicators.

Not having a policy is not considered to be appropriate. Brent does not consider that the generic approach identified in the London Plan would deliver the number of dwellings that the London Plan identifies.

Not having a policy would have a negative impact on the following groups: age, disability, **pregnancy and maternity, sex, gender reassignment and race**, as the young / old, disabled, pregnant and on maternity leave, female, gender reassigned and black and minority ethnic groups are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity to greater access to facilities. **There will be a mixed / unclear impact on religion and belief, sexual orientation and marriage and civil partnership.**

Alternative Policy: To extend the scope of the small sites policy so that it potentially captures more sites

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	-	-	0	0	0	-	-	0	0	-	-	0	0	-	0	-	0	-	0	0	0	0	0

This policy approach will have negative impacts on: health; housing; accessibility; traffic; environmental health; biodiversity; climate change mitigation; land and soil; and flood risk. Increased scope of the policy may include increased developments within lower PTAL areas which would mean a greater dependence on private vehicles which could in turn lead to reduced levels of activity and increased air pollution, reducing health generally. Developments outside of the proposed priority locations are not fit for the habitation of those who are physically disabled as they require close proximity to goods and services in order to meet their requirements without difficulty. There is also concern of how the policy may push developments into areas which currently meet specific needs, such as housing for larger families. This could lead to reduction in such housing and its replacement with less required types. The expansion, or lack of a requirement for the Urban Greening Factor to be applied, may also leave areas currently not considered vulnerable to development which could lead to a reduction in biodiversity, soil quality and permeability for flood mitigation.

The policy will have neutral impacts on social inclusion, quality of surroundings, crime, community identity, waste, resources, landscape, heritage, climate change adaption, open space, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation are mixed/ unclear. The policy is likely to increase the potential capacity of homes delivered on these

sites. This could be to the benefit of some of those with protected characteristics in terms of meeting their housing needs. On the other hand, the homes that will be provided will also be in locations that overall will have much more limited access to public transport or services as they would be in more remote locations. This will result in a negative impact for the young/old, disabled, pregnant/ maternity, females, gender reassigned and black and minority ethnic groups who are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity for greater access to facilities.

Alternative Policy: To further reduce the scope of the small sites policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0	0	-	-	-	0	-

This policy approach will have negative impacts on: social inclusion; housing; accessibility; traffic; regeneration; employment; investment; and efficient infrastructure. This policy approach will decrease site provision, therefore reducing the provision of housing, its general affordability and the likelihood of housing meeting the individual needs of residents leading to lower levels of social inclusion, disproportionately impacting those with protected characteristics. The reduced scope of this policy is likely to mean a lower level of development in town centre areas, increasing development in areas outside town centres, including areas of lower PTAL which will reduce resident’s accessibility to key services, in the process increasing their dependence on personal vehicles. The reduced development in town centre areas will have negative economic consequences, resulting in lower levels of growth and investment in these areas and as a result fewer job prospects and increased commuting.

This policy will have neutral impacts on well-being, quality of surroundings, crime, community identity, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, and education.

The impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation are mixed/ unclear. The policy is likely to reduce the potential capacity of homes delivered on these sites. This could be to the detriment of some of those with protected characteristics in terms of meeting their housing needs. On the other hand, for instance if a higher PTAL level (4 or above was required) the homes that will be provided will be in locations that overall will have much better access to public transport. This will be better for the young/old, disabled, pregnant/ maternity, females, gender reassigned and black and minority ethnic groups who are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity for greater access to facilities.

Conclusion: The proposed policy is seen as appropriate for Brent, considering its current transport infrastructure and its location. This policy supports small site development which should help the council meet its housing requirements. As with other policies, this policy helps balance out the pros and cons of additional development, whereby capturing more sites would be of environmental detriment, and reduced scope would decrease housing provision, negatively impacting the provision of affordable housing also.

Policy: BH5 AFFORDABLE HOUSING

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	+	++	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0

The policy approach will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, diversity, accessibility, and employment opportunities. The policy will seek to maximise the amount of affordable housing provided, thus giving greater opportunity for those with limited resources to better meet their housing needs, rather than living in for example more expensive, overcrowded, poor quality or temporary accommodation. The policy sets a target of 50% of new homes within the plan period being affordable housing. Of this 50%, non-Build-to Rent developments of 10 dwellings or more are expected to provide at least 70% social rent / London affordable rent and 30% intermediate products. For Build to Rent developments, a minimum of 100% at London Living Rent is expected. This will improve a number of associated objectives that relate to quality of life and life chances which impact on issues such as health, accessibility to services, educational outcomes and improved employment opportunities. Any deviation from the affordable tenure mix and other policy requirements consistent with the fast track approach will require justification through a policy complaint viability assessment. This will ensure that the target will not result in reduced provision of affordable housing due to viability reasons.

The policy will have neutral impacts on community safety, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, open space, flood risk, education and skills and infrastructure. There is unlikely to be any significant variation between the provision of market and affordable homes on outcomes in relation to these particular objectives.

In relation to marriage and civil partnership, religion and belief and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The impacts on age, disability, race, pregnancy and maternity, gender, gender reassignment are likely to be positive.

The policy seeks to maximise truly affordable dwellings within the borough, balancing up identified priority needs with the potential capacity/ viability of homes delivered on sites. In relation to the groups that the policy is identified as having a positive impact on, this is because these protected characteristics contain sub-groups which are on the whole likely to have a higher representation in affordable housing needs than the general population due to their economic circumstances being poorer.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	0

Not having a policy regarding affordable housing is likely to have a negative impact in terms of social indicators. The lack of provision of affordable housing would result in more expensive homes, overcrowding, poor quality accommodation and temporary accommodation. This will result in a reduced quality of life and life chances, which impact on issues such as health, accessibility of services, educational outcomes and improved employment opportunities.

Not having a policy regarding affordable housing is likely to have a neutral impact in terms of environmental indicators. There is unlikely to be any significant variation between the provision of market and affordable homes on outcomes in relation to these particular objectives.

Not having a policy regarding affordable housing is likely to have a mainly neutral but slightly negative impact in terms of the economy. There is unlikely to be any significant variation between the provision of market and affordable homes on outcomes in relation to these particular objectives, however, a mix of tenures within communities and in particular sufficient affordable homes to assist provide living accommodation for those on lower incomes who occupy jobs which are nevertheless necessary to support the functioning of society is likely to help promote sustainable, resilient and inclusive economic growth with tangibly benefits Brent residents and the environment.

Not having a policy is not considered to be appropriate, as it would not be regarded as being in general conformity with the London Plan.

Not having a policy regarding affordable housing is likely to have a negative impact on the protected characteristics of age, disability, race, pregnancy and maternity, sex, gender reassignment. This is because these sub-groups are on the whole likely to have a higher representation in affordable housing needs than the general population. **On the other protected characteristics (marriage and civil partnership, religion and belief and sexual orientation) this approach is likely to have a neutral impact.**

Alternative Policy: To provide more emphasis on providing intermediate products																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0
<p>This policy approach will have negative impacts on: social inclusion; health; housing; quality of surrounding; community safety; community identity; accessibility; regeneration; and employment. This policy has a potentially large negative socio-economic impact with primary concern residing over the policies misalignment with borough need of social housing and affordable rent. This policy may therefore serve to increase inequality by exiling the borough’s most economically disadvantaged, disproportionately occupied by those with certain protected characteristics, reducing their social integration, living conditions and prospects generally, and increasing levels of crime and resentment between demographics. Also, those most economically vulnerable often fill essential service roles within the economy which are often low paid. The emphasis on intermediate products and not social housing will mean there is a smaller amount of dwellings which can feasibly be occupied by these individuals. This will have a direct impact on the viability of local businesses which require local people to employ in these key service roles.</p> <p>This policy will have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, investment, education, and efficient infrastructure.</p> <p>The impacts on age, disability, race, pregnancy and maternity, sex and gender reassignment are likely to be negative when compared against the preferred policy. In relation to marriage and civil partnership, religion and belief and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy seeks to maximise more intermediate affordable dwellings within the borough. This essentially moves away from priority housing needs for those less likely to be able to address their needs in the market. In relation to the groups that the policy is identified as having a negative impact on, this is because sub-groups of these protected characteristics are on the whole likely to have a higher representation in affordable housing needs than the general population due to their economic circumstances being poorer. Whilst an increase in intermediate tenures will be positive for some of the population, allowing them to potentially own their own home eventually, these people are generally are likely to be better off and able to afford solutions in the market, such as renting.</p>																								
Alternative Policy: To seek a higher proportion of affordable housing than the London Plan fast track thresholds																								

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0

There are no anticipated positive impacts of adopting this policy over the current proposed policy.

The predicted negative impacts of this policy are: social inclusion, health, housing, quality of surroundings, community safety, community identity, accessibility, regeneration, employment. These impacts are a result of the policy's potential due to viability to lead to a move away from the current preferred mix which is viable at the threshold levels identified. A higher target will reduce the provision of affordable housing types for which there is an identified need within the borough, including socially rented and London Affordable Rent options. This will negatively impact upon the living standards of those most economically disadvantaged by reducing their capacity to acquire appropriate housing, increasing their reliance upon privately rented accommodation, reducing their levels of disposable income which in turn reduces their real capacity to access local services. This will also serve to obstruct communication between different communities and cultures and those with protected characteristics, increasing feelings of social segregation, decreasing their sense of community and increasing crime rates within the area. Those most economically vulnerable often fill essential service roles within the economy which are often low paid. The reduced provision of affordable housing which meets an identified need within the borough will mean there is a smaller amount of dwellings which can feasibly be occupied by these individuals. This will have a direct impact on the viability of local businesses which require local people to employ in key service roles, reducing local employment overall.

This policy is predicated to have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, investment, education, and efficient infrastructure.

The impacts on age, disability, race, pregnancy and maternity, gender, gender reassigned and race are likely to be negative when compared against the preferred policy. In relation to marriage and civil partnership, religion and belief and sexual orientation the policy is unlikely to have a difference on those with a protected characteristic. The policy would result in greater affordable homes delivered, but more intermediate affordable dwellings within the borough at the expense of rented. This essentially moves away from priority housing needs for those less likely to be able to address their needs in the market. In relation to the groups that the policy is identified as having a negative impact on, this is because these groups are on the whole likely to have a higher representation in affordable housing needs than the general population due to their economic circumstances being poorer. Whilst an increase in intermediate tenures will be positive for some of the population, allowing them to potentially own their own home eventually, these people are generally are likely to be better off and able to afford solutions in the market, such as renting.

Conclusion: The proposed policy is seen to have the greatest propensity for positive change within the borough. The borough has a specific need for both socially rented and London Affordable Rent dwellings for which this policy should help to increase by emphasising their provision. These types of housing require greater levels of developer subsidy, directly impacting site viability. Therefore, with the implementation of greater levels of affordable housing, comes a restriction upon the proportion of the units which can feasibly be under this tenure, resulting in lower levels of socially rented accommodation and greater levels of intermediate rental units.

Policy: BH6 HOUSING SIZE MIX																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0
<p>The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, diversity, accessibility and employment opportunities. The policy will seek to increase the amount of larger family housing provided compared to market delivery rates that would otherwise prevail. This will potentially give greater opportunity for larger families to better meet their housing needs, rather than living in for example more cramped conditions, or for example multi-generational households being split. This will improve a number of associated objectives that relate to quality of life and life chances which impact on issues such as health, accessibility to services, educational outcomes and improved employment opportunities.</p> <p>The policy will have neutral impacts on community safety, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, open space, flood risk, education and skills and infrastructure. There is unlikely to be any significant variation between the provision of smaller and larger homes on outcomes in relation to these particular objectives.</p> <p>The impacts on race, disability, religion and belief, pregnancy and maternity are likely to be positive. In relation to marriage and civil partnership, age, sex, gender reassignment and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy seeks to provide a minimum number of larger family dwellings. This is somewhat off the need identified but is also influenced by impact on viability and ensuring mixed communities on new developments. In relation to the groups that the policy is identified as having a positive impact on, this is because these groups are more likely to require larger family dwellings, either to accommodate extended or more immediate family members, to accommodate potential live in professional carers or to accommodate division of space between males and females related to religion. To purely rely on the market is likely to result in nearly all dwellings being 1 or 2 bed, which will not meet Brent's priority needs which are for 3 bed or larger properties.</p>																								

Alternative Policy: To provide an overview of accommodation needs, but no minimum target

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	0	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	0

This policy will negatively impact social inclusion, well-being, housing, crime, community identity, accessibility, and regeneration. This policy would lack guidance for developers, resulting in the likely decrease in provision of 3 bed family units, reducing their social inclusion and increasing their chances of having compromised living conditions, reducing their overall health and well-being. The reduced integration of families will lead to their diminished influence in a neighbourhood, resulting in the likely increase in levels of crime. New developments are focused around high PTAL areas in close proximity to town centres, reducing provision of family units will decrease their levels of access to essential infrastructure such as schools and healthcare. This will also lead to their increased dependence on personal vehicles for transporting children to and from school, increasing traffic and decreasing their activity levels and potential future participation in physical activity.

This policy is predicated to have neutral impacts on quality of surroundings, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, employment, investment, education, and efficient infrastructure.

The impacts on race, disability, pregnancy and maternity, religion and belief are likely to be negative. In relation to marriage and civil partnership, age, sex, gender reassignment and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy would unlikely lead to greater implementation of family housing than if the policy did not exist. As such those requiring larger family homes due to extended family or more immediate family requirements, to accommodate potential live in professional carers or to accommodate division of space between males and females related to religion are likely to not have their needs met.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	0	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	0

Not having a policy would likely negatively impact social inclusion, well-being, housing, crime, community identity, accessibility, and regeneration. Not having a policy would lack guidance for developers, resulting in the likely decrease in provision of 3

bed family units, reducing their social inclusion and increasing their chances of having compromised living conditions, reducing their overall health and well-being. The reduced integration of families will lead to their diminished influence in a neighbourhood, resulting in the likely increase in levels of crime. New developments are focused around high PTAL areas in close proximity to town centres, reducing provision of family units will decrease their levels of access to essential infrastructure such as schools and healthcare. This will also lead to their increased dependence on personal vehicles for transporting children to and from school, increasing traffic and decreasing their activity levels and potential future participation in physical activity.

This approach is predicated to have neutral impacts on quality of surroundings, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, employment, investment, education, and efficient infrastructure.

Not having a policy is not considered to be appropriate, as it would likely result in significantly fewer new family sized homes being built, thus meaning greater overcrowding and also out migration of the existing population in order to meet their housing needs.

The impacts on race, disability, pregnancy and maternity, religion and belief are likely to be negative. In relation to marriage and civil partnership, age, sex, gender reassignment and sexual orientation the policy is likely to have a neutral impact those with a protected characteristic. Not having a policy would likely lead to less family housing being constructed than if such a policy did exist. As such those requiring larger family homes due to extended family or more immediate family requirements, to accommodate potential live in professional carers or to accommodate division of space between males and females related to religion are likely to not have their needs met.

Alternative Policy: To provide a higher target

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0

This policy will negatively impact social inclusion, well-being, housing, accessibility, and employment. Although there is an identified need within the borough for family dwellings, its over provision will significantly impact on development viability and lead to the reduction in output of other units which have an identified need. This will impact negatively on social inclusion and access to housing

which is suited to the needs of smaller households, reducing their overall well-being and ability to participate effectively in society, reducing their long-term employment opportunities.

This policy is predicated to have neutral impacts on quality of surroundings, crime, community identity, traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaptation, land and soil, open spaces, flood risk, regeneration, investment, education, and efficient infrastructure.

The impacts on race, disability, pregnancy and maternity are likely to be positive. In relation to marriage and civil partnership, age, religion and belief, sex, gender reassignment and sexual orientation the policy is like to have a neutral impact. The policy would provide a minimum number of larger family dwellings more aligned to needs. This policy allows those requiring larger family homes due to extended family or more immediate family requirements, to accommodate potential live in professional carers or to accommodate division of space between males and females related to religion to more likely have their needs met. However, additional provision will affect values which will impact on other outputs such as affordable housing and total dwelling numbers.

Conclusion: The proposed policy is seen to generate the greatest amount of positive impacts. This is achieved through a balanced approach whereby the policy provides sufficient guidance for developers on how to meet this borough need without compromising their ability to meet the needs of other specific housing requirements. This will lead to greater living conditions for larger families, achieving wider social benefits through the mixed type of accommodation provided on a specific site.

Policy: BH7 ACCOMMODATION WITH SHARED FACILITIES OR ADDITIONAL SUPPORT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity, accessibility, and employment opportunities. The policy will seek to support an increase in shared accommodation and accommodation with additional support and protect existing accommodation where it is required to meet needs. It seeks to ensure that such accommodation is located close to facilities and good public transport. It also seeks to maintain the quality of life of adjacent occupiers. The policy will allow a variety of sectors of the community to better meet their housing needs such as the aged and those with disabilities. This will improve a number of associated objectives that relate to quality of life and life chances which impact on issues such as health, accessibility to services, educational outcomes, and improved employment opportunities.

The policy will have neutral impacts on, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, open space, flood risk, education and skills and infrastructure. There is unlikely to be any significant variation between the provision of shared accommodation and standard homes on outcomes in relation to these particular objectives.

The impacts on age, disability, religion and belief, and sex are likely to be positive. In relation to race, marriage and civil partnership, pregnancy and maternity, gender reassignment and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy allows for the specific needs of some protected characteristics groups to be met through communal living. In relation to age this will be beneficial for the young (students, those who are on benefits with age restrictions on types of accommodation they can access, or those with supported housing needs), the old (nursing homes), disabled could benefit through supported schemes and women for example through shelters protecting them from domestic abuse, or accommodation providing relief from caring for a family member which they are more likely to do.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Not having a policy is likely to have a negative impact in terms of social indicators. The lack of a policy to manage such accommodation may lead to an over-concentration of accommodation in one place, which may lead to the social exclusion of those who do not fit into that category, leaving them to feel ill at ease. This may also cause the surrounding infrastructure to change in accordance with the specific needs of the new majority, leading to a reduction in diversity of services and further excluding the minority social groups by reducing their accessibility to required goods and services. The group in question may be of a particularly transient nature, reducing the sense of place further, and also the likelihood of ownership which could act to increase crime rates within the area. These groups of people would be more homogenous in their origin and social status, leading to a reduction in the sharing of values and perceptions through proximity. Additionally, the lack of a policy could lead to an under-provision of certain types of accommodation which meet specific borough needs such as those which require assisted living. This will disproportionately lead to the detriment of certain social groups who require accommodation in central areas, close to facilities and public transport. By reducing this required provision, this policy will lead to the social isolation of certain groups of residents and the associated reduction in overall well-being which comes with this.

Not having a policy is likely to have a neutral impact in terms of economic and environmental indicators.

Not having a policy is not considered to be appropriate, as without it, accommodation may be placed in inappropriate locations and potentially have an adverse impact on neighbourhoods through over-concentration of shared accommodation.

The impacts on age, disability, religion and belief and sex are likely to be negative. In relation to race, marriage and civil partnership, pregnancy and maternity, gender reassignment, and sexual orientation the policy is likely to have a neutral impact. This approach would reduce the opportunity for the specific needs of some protected characteristics groups to be met through communal living that could otherwise be met through the preferred policy. In relation to age, this will be detrimental for the young (students, those who are on benefits with age restrictions on types of accommodation they can access, or those with supported housing needs), the old (nursing homes), disabled could benefit through supported schemes and women for example through shelters protecting them from domestic abuse, or accommodation providing relief from caring for a family member which they are more likely to do.

Alternative Policy: To not include criteria that seek to stop an over-concentration of accommodation in a place

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have negative impacts on social inclusion, health and well-being, housing, quality of surroundings, crime, community identity, and accessibility. These impacts are all social and are associated with the likely over representation of certain social groups which may occur with the implementation of this policy amendment. Without specifications of accommodation concentrations, over representation of certain groups may lead to the social exclusion of those whom do not fit into that category, leaving them to feel ill at ease. This may also cause the surrounding infrastructure to change in accordance with the specific needs of the new majority, leading to a reduction in diversity of services and further excluding the minority social groups by reducing their accessibility to required goods and services. The group in question may be of a particularly transient nature, reducing the sense of place further, and also the likelihood of ownership which could act to increase crime rates within the area. These groups of people would be more homogenous in their origin and social status, leading to a reduction in the sharing of values and perceptions through proximity.

This policy will have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age, disability, religion and belief, and sex are likely to be more positive as there is potential for perhaps greater amounts of communal accommodation to be provided. In relation to race, marriage and civil partnership, pregnancy and

maternity, gender reassignment and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy allows for more of the specific needs of some protected characteristics groups to be met through communal living. In relation to age this will be beneficial for the young (students, those who are on benefits with age restrictions on types of accommodation they can access, or those with supported housing needs), the old (nursing homes), disabled could benefit through supported schemes and women for example through shelters protecting them from domestic abuse, or accommodation providing relief from caring for a family member which they are more likely to do.

Alternative Policy: To not require consideration of other potential non-self-contained accommodation for which there is a need when an existing use is no longer required on site.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have negative impacts on social inclusion, well-being, housing, quality of surroundings, and accessibility. The negative impacts outlined here are primarily associated with the reduction of accommodation types which meet specific borough needs such as those which require assisted living. This will disproportionately lead to the detriment of certain social groups whom require accommodation in central areas, close to facilities and public transport. By reducing this required provision, this policy will lead to the social isolation of certain groups of residents and the associated reduction in overall well-being which comes with this.

This policy will have neutral impacts on crime, community identity, traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age, disability, religion and belief and sex are likely to be negative. In relation to race, marriage and civil partnership, pregnancy and maternity, gender reassignment, and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy would reduce the opportunity for the specific needs of some protected characteristics groups to be met through communal living that could otherwise be met through the preferred policy. In relation to age this will be detrimental for the young (students, those who are on benefits with age restrictions on types of accommodation they can access, or those with supported housing needs), the old (nursing homes), disabled could benefit through supported schemes and women for example through shelters protecting them from domestic abuse, or accommodation providing relief from caring for a family member which they are more likely to do.

Conclusion: The proposed policy is seen to be most beneficial to Brent, providing significant positive impacts. This is due to the policies broad considerations of the needs of those who require shared facilities/assisted living and the impacts that their presence may have on the local community. The policy identifies the potential problems which may be caused by the over representation of any social groups in an area, and the acknowledgement that borough needs are dynamic and that developments may be utilised for a variety of purposes. The Public Sector Equality Duty also requires the fostering of good relations between groups with a protected characteristic, and those without. As such the policy, by way of identifying potential problems associated with over-representation of any social groups, supports the fostering of good relations amongst all social groups.

Policy: BH8 SPECIALIST OLDER PERSONS HOUSING

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	++	+	++	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity and accessibility. The policy will seek to support an increase in the provision of specialist homes for older people to better meet needs. Whilst the market might seek to respond to needs, evidence to date indicates that the response has been limited. A proactive approach by the Council to encourage provision on sites is likely to better meet needs than would otherwise be the case. This will improve a number of associated objectives that relate to quality of life for older people which impact on issues such as social exclusion, health and accessibility to services.

The policy will have neutral impacts on, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, open space, flood risk, education, employment opportunities and skills and infrastructure. There is unlikely to be any significant variation between the provision of older person’s housing and standard homes on outcomes in relation to these particular objectives.

The impacts on age and disability are likely to be more positive as there is potential for perhaps greater amounts of communal accommodation to be provided. In relation to race, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy is like to have a neutral impact on those with a protected characteristic. The policy allows for more of the specific needs of some protected characteristics (notably age) groups to be met through communal living. In relation to age this will be beneficial for older people and disabled (wardens/ extra care/ nursing homes).

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Impacts are likely to be negative in terms of social indicators. Not having a policy would likely lead to a reduced number of sites coming forward for older people’s housing development due to the increased demands reducing development profitability and viability to purchase sites. It will also reduce the opportunities for older people to move out of accommodation they are under-occupying, which is likely to be larger homes that could be occupied by families for which there is a need within the borough.

Impacts are likely to be neutral in terms of economic and environmental indicators.

This approach is not considered to be appropriate, as it provides no certainty that at least some of the specialist older people’s target will be achieved.

The impacts on age and disability are likely to be negative, as there is a risk of an insufficient amount of communal accommodation being provided in the plan period. In relation to race, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy is like to have a neutral impact on those with a protected characteristic.

Alternative Policy: To require higher or lower provision from sites in Growth Areas

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

There are no anticipated Positive impacts of adopting this policy over the current proposed policy.

The negative impacts associated with this policy are in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity, and accessibility. The current provision represents 10% of the growth area development capacity to 2041 and is seen as an appropriate target. Amendments to this target would likely result in the over development of specialist sites and the under development of dwellings which meet other needs within the borough, or vice versa. Focusing too heavily on one need will therefore be to the detriment of other needs, reducing equality overall.

This policy will have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaptation, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age and disability are likely to vary. Providing less specialist older people’s housing will result in negative impacts on the population as a whole as needs are less likely to be met, whilst providing more than the preferred policy is likely to result in more positive impacts in relation to age and disability. In relation to race, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy is likely to have a neutral impact on those with a protected characteristic. The policy allows for either more or less of the specific needs of some protected characteristics groups to be met through communal living. In relation to age this will be beneficial for older people and disabled (wardens/ extra care/ nursing homes) where more is provided, but less beneficial where less accommodation is provided. Providing more is likely to impact on the provision of other affordable needs as it will be argued that such provision impacts on development viability, this could have consequential adverse impacts on some groups with protected characteristics that are more likely to be reliant on mainstream affordable housing than the general population.

Alternative Policy: To identify a smaller threshold than 500 dwellings or set a target for these sites

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The negative impacts associated with this policy are in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity, and accessibility. This policy amendment would likely lead to a reduction in sites coming forward for development due to increased demands reducing development profitability and viability. This would lead to a potential reduction of housing provision and also provision of sites for specialist housing needs, such as those for older people, resulting in the inverse intention of the proposed policy. The growth areas have been chosen due to their high levels of service accessibility and are therefore appropriate for the development of older persons housing, however, developments outside of these areas are likely to have lower levels of accessibility to facilities and lower PTALs which would not suit housing requirements for this demographic. Therefore, it is seen as appropriate that 500 units would be sufficient to help uplift an area outside of a growth area, providing potential for additional infrastructure should needs not be met already within an area.

This policy will have neutral impacts on traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

The impacts on age and disability are likely to vary. To identify a smaller site threshold and setting a target could result in providing more specialist older people’s housing, which could in turn result in more positive impacts in relation to age and disability. In relation to race, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy is likely to have a neutral impact those with a protected characteristic. The policy allows for either more or less of the specific needs of some protected characteristics groups to be met through communal living. In relation to age this will be beneficial for older people and disabled (wardens/ extra care/ nursing homes) where more is provided. However, providing more specialist older persons housing is likely to impact on the provision of other affordable needs, and on smaller sites could also affect delivery timing of market dwellings as it could be argued that such provision impacts on development viability. This could have consequential adverse impacts on some groups with protected characteristics that are more likely to be reliant on mainstream affordable housing than the general population.

Conclusion: The proposed policy has the greatest potential to enable positive change within the borough. The proposed policy provides a realistic expectation on delivery of specialist homes whilst not undermining the requirements of other social groups and policies. This figure, combined with other requirements, still allows developers sufficient flexibility in order to remain viable, encouraging them to continue to deliver housing within the borough.

Policy: BH9: GYPSY AND TRAVELLER ACCOMMODATION

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	++	+	++	+	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, diversity, accessibility, open spaces and education. The policy will seek to support an increase in the provision of specialist sites for gypsies and travellers to better meet the need to address overcrowding on the existing Lynton Close site and the need to move into bricks and mortar accommodation. A proactive approach by the Council to encourage provision of sites is likely to better meet needs than would otherwise be the case. This will improve a number of associated objectives that relate to quality of life related to the lack of specific sites with facilities to meet needs which impact on issues such as social exclusion, health, accessibility to services and educational attainment, whilst potentially addressing issues such as sporadic use of open space as temporary stopping places. These

impacts are disproportionately higher in gypsy and traveller communities particularly where a lack of sites requires a consistent short stay itinerant existence to be perpetuated.

The policy will have neutral impacts on, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, flood risk, employment opportunities and skills and infrastructure. There is unlikely to be any significant variation between the provision of gypsy and travellers' sites compared to residential accommodation on outcomes in relation to these particular objectives.

In relation to race the policy is likely to have a positive impact on those with a race protected characteristic. On age, disability, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief and sexual orientation the policy will have uncertain impacts on those with a protected characteristic. The policy should increase the opportunity to meet any identified need for pitches. This will be of benefit to the gypsy and traveller community, therefore leading to a positive impact on those with this race protected characteristic. Providing more sites could however impact on the provision of other affordable needs as it will be argued that such provision impacts on development viability, or takes up considerably more space than an equivalent number of mainstream affordable homes to meet needs. As there is limited land and funding for affordable dwellings, this could have consequential adverse impacts on some groups with protected characteristics that are more likely to be reliant on mainstream affordable housing than the general population which provision of traveller sites could reduce.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Not having a policy regarding Gypsy and Traveller Accommodation is likely to have a negative impact in terms of social indicators. Not having such a policy would mean that no sites would be designated, reducing the likelihood of provision and meeting local need. This would reduce these minority groups' sense of inclusion and their stake in society.

Not having a policy regarding Gypsy and Traveller Accommodation is likely to have a neutral impact in terms of environmental and economic indicators.

This approach is not considered to be appropriate, as it would not be regarded as being in general conformity with the London Plan and national Planning Policy for Gypsy and Traveller Sites.

In relation to race, this approach is likely to have a negative impact on those with a race protected characteristic. On age, disability, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief, and sexual orientation the policy will have neutral impacts on those with a protected characteristic. Not seeking to accommodate the identified needs for any additional pitches, or seeking to retain the existing Lynton Close traveller's site, may lead to an under-provision of pitches, which could lead to a negative impact on this protected group.

Alternative Policy: To identify a target but not prioritise any particular site through use of a criteria based policy only.

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	-	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have negative impacts with regards to social inclusion, housing, quality of surroundings and community identity. The primary issues related to this policy revolve around social inclusion. Although this policy would seek to identify a target for site provision, it would not actually designate any potential sites, reducing the likelihood of provision and meeting the proposed target. This would serve to reduce the provision of pitches for these minority groups which will not help meet their specific cultural needs, reducing their sense of inclusion and their stake in society in the process.

This policy will have neutral impacts on well-being, crime, accessibility, traffic, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

In relation to race the policy is likely to have a positive impact on those with a race protected characteristic. On age, disability, sex, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion and belief, and sexual orientation the policy will have uncertain impacts on those with a protected characteristic. The policy should increase the opportunity to meet any identified need for pitches. This will be of benefit to the gypsy and traveller community. The potential benefits however are unlikely to be as great as the preferred option as securing sites for delivery would be much less likely. Providing more sites could however impact on the provision of other affordable needs as it will be argued that such provision impacts on development viability, or takes up considerably more space than an equivalent number of mainstream affordable homes to meet needs. As there is limited land and funding for affordable dwellings, this could have consequential adverse impacts on some groups with protected characteristics that are more likely to be reliant on mainstream affordable housing than the general population which provision of traveller sites could reduce.

Conclusion: The proposed policy performs much better than the alternative, having positive impacts against a wide range of criteria. The policy enforces the consideration of specialist sites for Gypsy and Traveller needs and identifies a site which should be retained for such a use. The alternative does not do this, providing no guidance on how development proposals should incorporate the provision of sites for this particular need, simply providing a target which will not be met without the necessary emphasis on process.

Policy: BH10 RESISTING HOUSING LOSS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs and diversity. The policy will seek to maintain homes where possible but to allow for the limited loss of dwellings to provide for family homes, bring homes up to space standards or provide necessary infrastructure. Whilst it might result in some loss of housing, affecting overall home numbers this would provide for better quality homes that better meet priority needs in the borough and also necessary infrastructure facilities that will generally support an improvement in the quality of life. This will improve a number of associated objectives that relate to quality of life which impact on issues such as social exclusion, health, homes that meet needs and potentially diversity related to ethnic background such as larger family sizes and need for places of workshop/ community facilities for groups.

The policy will have neutral impacts on high quality environment, community safety, accessibility, open spaces and education traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, flood risk, employment opportunities and skills and infrastructure. Given the likely take up of policy and the fact it would mostly relate to a change in configuration/use of an existing building, impacts are likely to be small against these matters and have neutral impact.

In relation to race, disability and pregnancy and maternity the policy is likely to have a positive impact on those with a protected characteristic. On age, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy seeks to protect homes from loss, thus ensuring overall that housing targets are more likely to be achieved. The criteria for loss will allow for better family homes and better quality homes to be delivered, replacing in some cases poor stock. This is more likely to be of benefit to race (extended families accommodated in larger homes) maternity and pregnancy (larger homes to accommodate families) and disability (replacement of

substandard stock – usually with insufficient mobility standards/ size). The loss of dwellings allowed through this policy however is likely to be very small, so there will be no wider impacts in terms of other protected characteristics.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Not having a policy is likely to have a mixed impact in terms of social indicators, but mainly negative. While not having a policy may mean that fewer homes are de-converted to family sized dwellings (therefore resulting in reduced net housing loss), the benefits of this would be outweighed by the retention of sub-standard accommodation, which can have a negative impact on health and wellbeing.

Not having a policy is likely to have neutral impacts in terms of environmental and social indicators, as impacts are likely to be the same as they are currently.

Not having a policy is not considered to be appropriate, as it would not be regarded as being in general conformity with the London Plan.

Not having a policy is likely to have a negative impact in relation to race, disability, pregnancy and maternity. Not having a policy is considered to have a neutral impact in relation to age, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation. Not having a policy to manage the loss of residential dwellings would mean that there would not be any criteria to allow for better family homes and better quality homes to be delivered, in some cases replacing poor stock. This is more likely to negatively impact the following groups: race (extended families accommodated in larger homes) maternity and pregnancy (larger homes to accommodate families) and disability (replacement of substandard stock – usually with insufficient mobility standards/ size).

Alternative Policy: Developments resulting in a net loss of dwellings will only be considered whereby they are replacing units which are not in-keeping with local character AND replace units which do not meet an identified need within the borough with units that do.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	+	0	+	-	0	?	0	+	+	?	+	0	0	+	+	+	0	0	0

This policy approach has the potential to positively impact social inclusion, health and well-being, housing, quality of surrounds, community safety, community identity, traffic, flood risks, regeneration, and employment. Socially the policy may serve to increase the provision of certain housing needs within the borough, such as affordable housing and 3 bed family units which will help to increase social inclusion. This policy would disproportionately benefit those with specialist housing requirements, such as the elderly or physically disabled, helping to improve their life chances, increasing equality for those with protected characteristics within the borough. The benefits of redevelopment will also act to improve the character of an area, improving the public domain through the receipt of additional CIL, increasing resident's sense of place and potentially reducing crime in the process. Environmentally speaking the new developments may be able to reduce parking provision, decreasing levels of traffic and associated pollution, improving local character conformity, and increasing mitigation against flooding and storm events through the provision of sustainable measures such as SUDS. Economically the policy has potential to increase the provision of affordable housing and other housing needs, helping residents with their resilience to economic change and, as such, local businesses too due to access to a more stable workforce.

This policy may negatively impact waste management. As this policy will lead to an increase in developments there will be an associated increase in the accumulation of waste.

It is uncertain as to how the policy will impact environmental health, and climate change mitigation. This is due to a lack of insight into the potential cost benefit analysis of conflicting impacts. For instance, although the development has the potential to reduce pollution from traffic due to the decreased provision of parking spaces, the construction process itself will be heavily polluting in all respects. The same is true for the mitigation of climate change, for although the building may be built with more sustainable features, it is uncertain as to whether or not these outweigh the potential increase in CO2 caused by redevelopment.

This policy will have neutral impacts on accessibility, resources, biodiversity, land and soil, open spaces, investment, education, and efficient infrastructure.

In relation to race, disability and pregnancy and maternity the policy is likely to have a positive impact on those with a protected characteristic. On age, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy seeks to protect homes from loss, thus ensuring overall that housing targets are more likely to be achieved. The criteria for loss will allow for better family homes and better

quality homes to be delivered, replacing in some cases poor stock. This is more likely to be of benefit to race (extended families accommodated in larger homes) maternity and pregnancy (larger homes to accommodate families) and disability (replacement of substandard stock – usually with insufficient mobility standards/ size). The loss of dwellings allowed through this policy however is likely to be very small, so there will be no wider impacts in terms of other protected characteristics.

Conclusion: The proposed policy is seen to be the most appropriate for Brent, providing the potential to positively impact a number of key criteria. The proposed policy considers a wide range of factors, including the conversion to 3-bedroom dwelling houses which is an identified borough need and the increased conformity with local character. Housing is also allowed to be lost where it is replaced with required local infrastructure, such as that of a needed community centre which will positively impact the local community.

Policy: BH11 CONVERSION OF FAMILY SIZED DWELLINGS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, diversity and education. The policy will seek to maintain family homes where possible but to allow for the provision of new homes where the size of the building allows it. The addition of new homes and maintenance of family dwellings will meet priority needs in the borough. This will maintain or improve a number of associated objectives that relate to quality of life which impact on issues such as social exclusion, health, homes that meet needs, education due to a less cramped home environment and potentially diversity related to ethnic background such as larger family sizes.

The policy will have neutral impacts on high quality environment, community safety, accessibility, open spaces and education traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, flood risk, employment opportunities and skills and infrastructure. Given the likely take up of policy and the fact it would mostly relate to a change in configuration/ use of an existing building, impacts are likely to be small against these matters and have neutral impact

In relation to race, pregnancy and maternity and age, the policy is likely to have a positive impact on those with a protected characteristic. On disability, sex, marriage and civil partnership, gender reassign and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy seeks to protect family homes from loss and their re-

provision in any development through good access to amenity space, thus ensuring overall that housing targets are more likely to be achieved. The criteria for loss will allow for family homes to be retained. This is more likely to be of benefit to race (extended families accommodated in larger homes) and maternity and pregnancy (larger homes to accommodate families). The policy also supports parents being able to divide their home to provide for their children to have their own home and keep support close for both younger and older family members. In relation to other protected characteristics, no negative impacts have been identified. Minimum design standards would still apply, in accordance with other policies.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-

In relation to social indicators, not having a policy regarding the conversion of family-sized dwellings is likely to have an overall negative impact. Not having a policy may result in the loss of family homes or lack of provision of new homes where the size of the building allows for it. This could have a negative impact in relation to quality of life, impacting on issues such as social exclusion, health, homes that meet needs, education due to a less cramped home environment and potentially diversity related to ethnic background such as larger family sizes.

Not having a policy is likely to have mainly neutral impacts in terms of environmental and economic indicators as impacts are likely to be the same as they are currently. However, as noted above, there may be a negative impact in terms of education due to families being potentially being required to live in cramped home environments.

Not having a policy is not considered to be appropriate, as this would not be regarded as being in general conformity with the London Plan.

In relation to race and pregnancy and maternity and age, not having a policy is likely to have a negative impact. On disability, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation, not having a policy is likely to have a neutral impact. Not having a policy means that family-sized homes will have less protection from development which may negatively impact the protected characteristics of race (extended families accommodated in larger homes) and maternity and pregnancy (larger homes to accommodate families). It may also reduce the opportunities for families to subdivide homes to allow for their children to have their own home, reducing the opportunity for younger people to get on the property ladder.

Alternative Policy: Conversion of family sized dwellings will only be considered in areas with a PTAL rating of 4 or greater.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	-	0	-	-	+	+	0	-	+	+	0	0	+	+	+	0	0	+	0	+	0	+

The policy may serve to positively impact health and well-being, accessibility, traffic, environmental health, biodiversity, climate change mitigation and adaption, soil, growth, investment, and infrastructure. These impacts are associated with increased development densities within high PTAL areas, which may serve to decrease traffic and pollution, increase accessibility to local goods and services, increasing town centre viability and promoting investment within the borough improving local job prospects. It also

corresponds to the reduced demand on land elsewhere within the borough, allowing for the retention of greenspace and a reduction in the potential increase of impermeable land.

The policy may negatively impact housing, crime, community identity, and water resources. The primary concern with the implementation of this policy would be the reduction in larger housing units which can facilitate family occupation which is an identified need within the borough. A reduction in families occupying an area may inadvertently lead to an increase in crime. The increase in housing densities will also lead to an increased demand on the water supply and sewer capacity.

This policy will have neutral impacts on social inclusion, quality of surroundings, waste, landscape and townscape, heritage, open spaces, flood risk, employment, and education.

In relation to race, disability and pregnancy and maternity the policy is likely to have a positive impact on those with a protected characteristic. On age, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will a neutral impact on those with a protected characteristic. The policy seeks to protect family homes from loss and their re-provision in any development through good access to public transport, amenity space, thus ensuring overall that housing targets are more likely to be achieved. The criteria for loss will allow for family homes to be retained. This is more likely to be of benefit to race (extended families accommodated in larger homes) and maternity and pregnancy (larger homes to accommodate families). In relation to these protected characteristics and the disabled, good access to public transport will be beneficial as these groups are more likely to be reliant on public transport, walking and cycling to access services/ facilities. For those with other protected characteristics, no negative impacts have been identified.

Alternative Policy: Conversion of smaller properties than 130 sq.m. allowed.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	0	-	0	-	0	-	-	+	-	0	+	+	+	0	0	0	0	0	0	-

This policy approach will have a positive impact with regards to biodiversity, townscape, heritage, climate change mitigation and adaption, and soil. These impacts are all environmental and are associated with a reduced need to develop greenfield land through the intensification of already developed sites, and improving heating efficiency by reducing dwelling size and increasing occupation.

This policy approach will have a negative impact with regards to inequalities, well-being, housing, quality of surroundings, community identity, traffic, water resources, environmental health, and infrastructure. These impacts arise from the reduced standards in living conditions which may impact health and life satisfaction, disproportionately impacting those from certain societal sub-groups, reducing peoples pride for an area and resulting in its neglect by residents. The policy also serves to increase potential family units for conversion which will reduce family dwellings overall, leading to the reduction of a borough need. The policy does not specify which areas this policy should apply to and therefore captures sites outside of higher PTAL levels, resulting in the increased dependence upon personal vehicles, increasing traffic and pollution.

This policy is predicated to have neutral impacts on crime, accessibility waste, heritage, open space, flood risk, regeneration, employment, investment, and education.

In relation to age, race, disability and pregnancy and maternity, sex, marriage and civil partnership, gender reassigned and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy seeks to protect family homes from loss and their re-provision in any development. The policy could however result in substandard sized dwellings, as it could result in the promotion of dwellings that are too small to meet the London Plan standards.

Conclusion: The proposed policy is seen as most appropriate for Brent and has a number of positive impacts. The proposed policy will not lead to a reduction in family dwelling units which is an identified need within the borough, whereas the alternative policies would both lead to a reduction in its provision. The proposed policy also allows for exceptions to be made (where amenity space is so deficient that family occupation is unlikely and could not be reasonably changed to overcome such deficiencies) rather than applying a blanket rule, allowing for potential outliers requiring conversion despite not explicitly meeting the required criteria.

Preferred Policy: POLICY BH12 RESIDENTIAL OUTBUILDINGS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0

The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety and diversity. The policy will seek to ensure that residential outbuildings are not used as living accommodation, or

encourage greater occupation of homes than they were designed for. This will ensure that vulnerable people, which experience shows are often recent immigrants with limited options are not taken advantage of and exploited by poor quality landlords making them over-occupy properties, often with dangerous implications for safety and adverse impacts on neighbours' amenity related to issues such as waste management/ environmental quality. This will maintain or improve a number of associated objectives that relate to quality of life which impact on issues such as social exclusion, health, homes that meet needs and diversity.

The policy will have neutral impacts on accessibility, open spaces, traffic, waste, water, air pollution, bio-diversity, townscape, historic environment, climate change, soil, greenhouse gas emissions, flood risk, employment opportunities, education and skills and infrastructure. As the policy relates to existing residential properties, its impacts on these matters is likely to be very limited.

In relation to race, age, and disability, the policy is likely to have a positive impact. On pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact. The policy seeks to reduce the potential for poor quality residential accommodation to be provided in outbuildings, or for a home to be over-occupied by transferring elements normally included in a home (toilets, washing facilities, etc.) to outbuildings to allow other rooms to be let as bedrooms. The policy is likely to be beneficial in terms of race, as it is often minority groups (usually recent immigrants) that are more likely to be taken advantage of by unscrupulous landlords and put in over-crowded/ poor quality accommodation. There may also be positive impacts for modern slavery victims, victims of trafficking and asylum seekers, and on the protected characteristic of age as young people may be more affected by higher housing costs and therefore renting inappropriate outbuildings for residential purposes. For other protected characteristics there may be slight benefits, particularly for the disabled or others who may have lower incomes as the use of outbuildings as residential accommodation can result in sub-standard residential accommodation but the numbers are likely to be small.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	0	0	0	0	0	.	0	0	0	0	0	0	0	0	0	0

Impacts are likely to be negative in terms of social indicators. Not having a policy would reduce the council's ability to ensure that residential outbuildings are not used as living accommodation. This may have a detrimental impact on vulnerable people, which experience shows are often recent immigrants with limited options, as not having a policy reduces the chance to ensure that vulnerable people are not taken advantage of and exploited by poor quality landlords, often with dangerous implications for safety and adverse impacts on neighbours' amenity. This would impact a number of objectives relating to quality of life, in turn impacting on issues such as social exclusion, health, homes that meet needs and diversity.

Impacts are likely to be mainly neutral in terms of environmental and economic impacts. Not having a policy relates to existing residential properties, therefore impacts are likely to be limited. However, there is potential for a slight negative environmental impact in terms of creating, enhancing and maintaining attractive and clean environments.

Not having a policy is not considered to be appropriate, as it may encourage many problems associated with the misuse of residential outbuildings.

Not having a policy is likely to have a negative impact in relation to race and disability. Not having a policy is likely to have a neutral impact in relation to age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation. Not having a policy is likely to reduce the potential to prevent poor quality residential accommodation being provided in outbuildings, or for a home to be over-occupied by transferring elements normally included in a home (toilets, washing facilities, etc.) to outbuildings to allow other rooms to be let as bedrooms. Not having a policy may potentially therefore have a detrimental impact in terms of race, as it is often minority groups (usually recent immigrants) that are more likely to be taken advantage of by unscrupulous landlords and put in over-crowded/ poor quality accommodation. For other protected characteristics there may also be slight negative impacts, particularly for the disabled or others who may have lower incomes.

Alternative Policy: To allow conversion of outbuildings in situations which enhance the accessibility of care provision for dependant family members. Conversion must include the development of facilities which help the disabled in their day to day lives and do not lead to compromises in living conditions.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The policy has the potential to positively impact inequalities, health and well-being, housing, and traffic. This policy may allow those whom already care for dependant family members to do so in their own homes, whilst also providing the dependant individual with their own space. This will serve to improve both accessibility to care, and housing conditions for those whom provide the care. Providing dependants with outsourced care isn't always an economically viable option for families and this policy may provide a more appealing alternative for both parties. It will also serve as a potential halfway point for those which are semi-dependant and still have, and wish to maintain, their independence to some degree. This may also serve to reduce journeys made by personal vehicles by reducing the need of carers to travel off site to attend to their relative's needs. This policy will be of primary benefit to the elderly and those with disabilities, helping to improve their life chances and satisfaction.

This policy will have neutral impacts on quality of surroundings, crime, community identity, accessibility, waste, resources, environmental health, biodiversity, landscape and townscape, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

In relation to disability and race the policy will have a positive impact. In relation to age, sex, pregnancy and maternity, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on those with a protected characteristic. The policy would allow for the needs for disabled people to be better met, which would be positive for them and also their carers who are more likely to be women. The policy would still restrict the ability of ethnic minorities who are more likely to be exploited by unscrupulous landlords from occurring.

Conclusion: The proposed policy is seen to be most appropriate for Brent, having numerous positive impacts. Whilst an alternative of allowing exceptions for disabled households might appear to offer potential benefits to that group, it would also allow for the potential abuse by those seeking to game the system. In cases where there is a disabled occupier an extension is likely to be the best solution in any case to allow for closer proximity of carers. The proposed policy will hopefully lead to a reduction in use of inappropriate outbuildings for residential purposes which has led to overcrowding and poor general well-being of affected residents.

Preferred Policy: POLICY BH13 RESIDENTIAL AMENITY SPACE

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
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	+	+	+	+	0	0	0	0	0	0	0	+	+	0	0	+	0	0	0	0	0	0	0	
<p>The policy will have positive impacts in relation to social inclusion, health, homes that meet needs, high quality environment, community safety, bio-diversity, townscape and climate change. The policy will seek to ensure that residential dwellings are provided with a larger amount of amenity space than London Plan minimum requirements. This will have positive outcomes in making homes allow for better opportunities to occupiers to use outside space to socialise as a family and with neighbours, for recreational activities, etc., and as such the home is likely to better meet their needs. In addition, much of this amenity space will benefit from soft landscaping which will have environmental benefits in terms of adding to place, townscape, biodiversity and climate change. It will also ensure that people with more limited means are able to access good quality amenity space with their homes, rather than this only being available to those who are more likely to be able to afford it. This will maintain or improve a number of associated objectives that relate to quality of life which impact on issues such as social exclusion, health, homes that meet needs and diversity.</p> <p>The policy will have neutral impacts on accessibility, open spaces, traffic, waste, water, air pollution, historic environment, soil, greenhouse gas emissions, flood risk, employment opportunities, education, diversity and skills and infrastructure. As the policy relates to existing residential properties, its impacts on these matters is likely to be very limited.</p> <p>In relation to disability, age, pregnancy and maternity and race the policy will have a positive impact. On sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the seeks to ensure adequate provision of amenity space and for it to be accessible, and larger for family sized dwellings. This will be better for younger and older people who are more likely to take advantage of amenity space, for race as black and minority ethnic groups are likely to have larger families/ more children, pregnancy and maternity as it will benefit those with babies and small children, and also for the disabled as it allows space to be accessible close to home. Whilst the availability and access to amenity space will be beneficial to the population as a whole, for the other protected characteristics it is unlikely to have additional benefits. Viability and other assessment indicates that the policy does not undermine provision of homes as the amenity space helps to also address other policy requirements such as greening/ bio-diversity and surface water attenuation.</p>																								
Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	0	0	0	0	0	0	0	-	-	-	0	0	-	0	0	0	0	0	0	0

Not having a policy is likely to have a mainly negative impact on social indicators. Not having a policy regarding residential amenity space could result in increased dwelling numbers with associated improvements for viability potentially allowing for some more affordable housing to be provided, thereby having a positive impact on housing delivery. However, there would be other negative social impacts, by creating larger inequalities in access to general amenity provision between the most and least well off residents, with more affordable dwellings meeting standards and more expensive dwellings exceeding them. Reduced amenity space is likely to negatively impact residents' health due to the lower potential for physical activity that they facilitate, leading to a decrease in resident satisfaction.

Not having a policy will have some negative impacts on environmental indicators, and some neutral. Not having a policy would impact the provision of the associated soft landscaping, potentially reducing biodiversity and the environmental benefits related to this and the general appearance of the townscape.

Impacts are likely to be neutral in relation to economic indicators.

Not having a policy is not considered to be appropriate, as it will likely result in minimum standards which are consistent with inner London characteristics being delivered in most cases.

Not having a policy is likely to have a negative impact in relation to disability, age and race. Not having a policy is likely to have a neutral impact in terms of pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation. Not having a policy regarding residential amenity space will likely result in minimum standards, which may result in lack of adequate provision of accessible amenity space, or amenity space suitable for larger family sized dwellings. This would negatively impact younger and older people who are more likely to take advantage of amenity space, for race as black and minority ethnic groups are likely to have larger families/ more children and also for the disabled as it allows space to be accessible close to home. Whilst the availability and access to amenity space will be beneficial to the population as a whole, for the other protected characteristics it is unlikely to have additional benefits.

Alternative Policy: Require mid-point between proposed policy and London Plan minimums.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	-	-	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0	0

The policy has the potential to positively impact housing. By decreasing the required provision of amenity space this policy may increase the viability of greater levels of affordable housing.

This policy is likely to negatively affect inequalities, health and well-being, quality of surroundings, crime, community identity, biodiversity, and townscape. The negative impact of this policy will primarily be social, creating larger inequalities in access to general amenity provision between the most and least well off residents, with more affordable dwellings meeting standards and more expensive dwellings exceeding them. Reduced amenity space is likely to negatively impact resident’s health due to the lower potential for physical activity that they facilitate, leading to a decrease in resident satisfaction. The policy will also impact the provision of the associated soft landscaping, potentially reducing biodiversity and the environmental benefits related to this and the general appearance of the townscape.

This policy will have neutral impacts on accessibility, waste, resources, environmental health, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

In relation to disability, age, and race the policy will have a positive impact. On pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will not have a neutral impact. The policy seeks to ensure better provision of amenity space than the minimum required in the London Plan and for it to be accessible, and larger for family sized dwellings. This will be better for younger and older people who are more likely to take advantage of amenity space, for race as black and minority ethnic groups are likely to have larger families/ more children and also for the disabled as it allows space to be accessible close to home. Whilst the availability and access to amenity space will be beneficial to the population as a whole, for the other protected characteristics it is unlikely to have additional benefits. The benefits are less than the preferred policy.

Alternative Policy: Require greater than policy requirements.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	+	-	+	0	+	-	-	0	0	0	+	+	0	0	+	+	+	+	-	-	-	0	-

This policy may serve to positively affect health and well-being, quality of surroundings, community identity, biodiversity, townscape, climate change adaptation, soil, open space and flood risk. Socially, this policy will improve access to sufficient amenity space for all, not just the privileged, increasing satisfaction and reducing inequalities within the borough. The increased provision of soft landscaping will positively affect biodiversity levels, townscapes, and resilience to storm events through increased permeability and associated decreased flooding potential.

Negative impacts will be with regards to inequalities, housing, accessibility, traffic, regeneration, employment, investment, and efficient infrastructure. Increased space standards are likely to raise the costs of living to residents as the costs of development are passed onto the customers. This will reduce viability of housing projects, decreasing both housing provision and provision of affordable housing as a whole and as a percentage, increasing inequalities overall. The increased space required for development will likely push developments away from town centres where land is scarce, and into lower PTAL areas. This will directly affect the accessibility to essential services, increasing reliance on traffic and decreasing town centre viability through a reduction in density and associated footfall.

This policy will have neutral impacts on crime, waste, resources, environmental health, heritage, climate change mitigation, and education.

In relation to disability, age, and race the policy will have a positive impact. On pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact. The policy seeks to ensure significant provision of amenity space and for it to be accessible, and larger for family sized dwellings. This will be better for younger and older people who are more likely to take advantage of amenity space, for race as black and minority ethnic groups are likely to have larger families/ more children and also for the disabled as it allows space to be accessible close to home. Whilst the availability and access to amenity space will be beneficial to the population as a whole, for the other protected characteristics it is unlikely to have additional benefits. The need to provide significantly greater amenity space than the preferred policy is likely to impact on site capacity and viability of developments, thus reducing overall housing numbers/affordable housing. This potentially could impact on all those with protected characteristics who are more likely to be dependent on affordable housing in particular, however the impacts cannot be quantified at this time.

Conclusion: The proposed policy is seen to be the most appropriate for Brent, having a wide range of potential positive impacts. The proposed policy seeks to provide sufficient levels of amenity space for all residents which will incur benefits, the reduction of this provision will likely lead to social inequalities. The provision of greater levels of amenity space than the preferred policy is not seen as desirable within Brent and would serve to increase development costs, reducing viability and the provision of affordable housing which would outweigh the gains seen from increased amenity space.

Social Infrastructure and Community Facilities

Policy: BSI1 SOCIAL INFRASTRUCTURE & COMMUNITY FACILITIES																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	0	+	+	++	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
<p>Impacts are positive in relation to promoting social inclusion and narrowing inequalities, improving the health of the population, providing a safe, high quality and healthy environment, crime reduction and prevention, engagement in high quality community services and facilities, the vitality and viability of Brent's town centres and traffic reduction. By protecting and retaining existing community facilities unless it can be demonstrated that there is no longer a community need, the policy will ensure an adequate provision of community facilities to meet the needs of Brent's existing and future population. This policy places requirements on new social infrastructure and community facilities to be easily accessible, located in flexible and adaptable buildings and to maximise the benefit of facilities to the wider community. To promote community cohesion and the best use of land this policy will seek the multiple use of new premises.</p> <p>Impacts are neutral in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs. Although the policy does promote the conversion of community facilities to alternative uses including specialist housing before other uses are considered, this is unlikely to provide significant numbers of new specialist housing.</p> <p>This policy is not applicable to objectives relating to waste production, water quality, air, noise and light pollution, conserving and enhancing the borough's natural habitats, protecting and enhancing the borough's landscape and townscape, the historic environment and cultural assets, climate change and reduction of greenhouse gases, soil quality, protecting open space, flood risk reduction, promoting sustainable economic growth, maximising the potential for everybody to contribute economically, indigenous and inward investment within the borough and encouraging efficient infrastructure to support economic growth.</p> <p>This policy will have a neutral impact on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. Social infrastructure plays a vital part in access to services for the old, young, and disabled as well as providing religious facilities for worshippers and those wishing to marry or enter into a civil partnership. Other protected groups such as sexual orientation and gender reassignment often access services provided in these facilities and so will also be positively affected by their provision.</p>																								

Alternative Policy: No policy to manage social infrastructure and community facilities, relying on London Plan policy																								
I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	0	+	+	++	+	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a
<p>Impacts are positive in relation to promoting social inclusion and narrowing inequalities, improving the health of the population, providing a safe, high quality and healthy environment, crime reduction and prevention, engagement in high quality community services and facilities, the vitality and viability of Brent’s town centres and traffic reduction. By protecting and retaining existing community facilities unless it can be demonstrated that there is no longer a community need, the policy will ensure an adequate provision of community facilities to meet the needs of Brent’s existing and future population. This policy places requirements on new social infrastructure and community facilities to be easily accessible, located in flexible and adaptable buildings and to maximise the benefit of facilities to the wider community. To promote community cohesion and the best use of land this policy will seek the multiple use of new premises.</p> <p>Impacts are neutral in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs. Although the policy does promote the conversion of community facilities to alternative uses including specialist housing before other uses are considered, this is unlikely to provide significant numbers of new specialist housing.</p> <p>This policy is not applicable to objectives relating to waste production, water quality, air, noise and light pollution, conserving and enhancing the borough’s natural habitats, protecting and enhancing the borough’s landscape and townscape, the historic environment and cultural assets, climate change and reduction of greenhouse gases, soil quality, protecting open space, flood risk reduction, promoting sustainable economic growth, maximising the potential for everybody to contribute economically, indigenous and inward investment within the borough and encouraging efficient infrastructure to support economic growth.</p> <p>This policy will have a neutral impact on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. Social infrastructure plays a vital part in access to services for the old, young, and disabled as well as providing religious facilities for worshippers and those wishing to marry or enter into a civil partnership. Other protected groups such as sexual orientation and gender reassignment often access services provided in these facilities and so will also be positively affected by their provision.</p>																								

Conclusion: The provision and retention of social infrastructure will be essential over the Local Plan period to support the high levels of population growth predicted in Brent and the wider region. The Assessment indicates that the policy has a number of positive impacts and that the impacts of the preferred policy are generally equal to the reasonable alternative, as the London Plan contains detailed policies across a range of social infrastructure categories. However, the proposed policy is seen as the most appropriate for Brent as it adds some detail on which forms of social infrastructure are most needed in the borough, which may differ from the wider London area.

Economy and Town Centres

Policy BE1: Economic Growth and Employment Opportunities for All																								
I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	+	+	?	+	+	?	+	-	?	?	0	0	0	-	-	0	0	0	++	++	+	+	+
<p>Impacts in relation to social objectives are overall positive. The overarching purpose of the policy is to create employment and training opportunities for Brent residents and secure workspace to support business and enterprise. Increasing access to employment increases income and in turn reduces poverty and social exclusion. Increased income has health and well-being benefits as it can help alleviate fuel poverty, increase access to good quality housing, and reduce social isolation by increasing opportunities to participate in sport and leisure. This can also help to alleviate mental health pressures associated with low income. Levels of unemployment are higher amongst women in the borough. This policy may therefore have scope to be of greater benefit to this group, however, this will be dependent on targeted employment, apprenticeships and training. The policy seeks affordable B use class workspace in the growth areas of Alperton, Burnt Oak Colindale, Church End, Neasden, Staples Corner and Wembley, and additional workspace opportunities in South Kilburn Growth area to be sought. The majority of these growth areas are located in areas in the top 20% most deprived in the country. Therefore, this policy has potential to benefit those facing higher levels of deprivation.</p> <p>Workspace and cultural and creative industries can help contribute to an areas sense of place, with potential positive impacts. However, workspace can also generate noise. Impacts on quality of surroundings are therefore uncertain and dependant on detailed design. Increasing employment can help to reduce poverty which can be a contributing factor to some crimes. The inclusion of workspace in development can also create ‘eyes on the street’ during the day which can help to improve feelings of safety. Positive impacts are therefore predicted against objectives S5 and S6.</p>																								

Integration of workspace in town centres could help promote their vitality and viability by creating a wider customer base. In addition, enhancing educational quarters in Wembley, Willesden and Northwick Park will help to extend the customer base of nearby town centres. However, this is dependent on a centres ability to attract these customers therefore impacts are uncertain.

Impacts will be uncertain in relation to the environment. Including workspace in mixed-use development can reduce the need to travel to work and reduce pressure on the transport network. Although travel into the borough for employment may also increase, workspace is to be directed to growth areas and town centres which have good public transport accessibility levels. Therefore, overall impacts are anticipated to be positive. Increasing employment and business in the borough has the potential to generate noise, waste and impact on water and air quality. Although sectors such as creative industries can be less intensive and polluting than traditional industries, there is still potential for pollution which will need to be mitigated.

Economic impacts are anticipated to be positive. This is to be expected given the purpose of the policy is to promote employment and economic growth. The policy will secure new affordable workspace, which will help SME businesses develop in the borough. In particular, the policy will help to promote creative industries which is a future growth sector. Targeted employment, apprenticeships and training will help reduce unemployment, provide job opportunities and improve qualifications and skills of the population. Locating workspace in the areas of most significant housing growth has the potential to reduce commuting and journey time. This is dependent on the people living within the development and surrounding area being able to access those jobs, but as the borough’s growth areas benefit from good public transport accessibility this policy is anticipated to have positive impacts overall.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, sexual orientation, age, pregnancy and maternity and disability. Training opportunities will be of benefit to all groups. The policy is likely to have a positive impact on the protected characteristic race and sex - noted above, levels of employment are lower amongst women in the borough. Employment rates also differ by ethnicity with black people having the lowest employment rate. Women and BAME groups could therefore benefit from this policy, particularly through targeted employment, apprenticeship and training.

Alternative Policy: To not secure affordable workspace in Growth Areas

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
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	+	?	?	0	0	0	?	-	+	+	?	0	0	0	-	-	0	0	0	0	+	0	+	0
<p>Impacts are uncertain in relation to social objectives. There will still be positive impacts from securing employment and training opportunities during construction. If affordable workspace is not secured there will not be employment and training opportunities in the end use. There will also be less scope to support SMEs if workspace is not secured on site. Therefore, although the policy will still have positive impacts it will be less likely to reduce poverty and social exclusion in the longer term. Meaning associated health and well-being benefits may not be fully realised. If the policy does not secure workspace it will not deliver the same benefits in terms of contributing to an areas sense of place and providing ‘eyes on the street’ during the day which can help to improve feelings of safety.</p> <p>Impacts will be uncertain in relation to the environment. If employment floorspace is not delivered in growth areas all occupants will need to travel to work, which could place pressure on the road network. This in turn will have negative impacts on air quality. However, there will also be less scope for noise and waste generation which can be associated with the operation of businesses.</p> <p>Economic impacts will be largely neutral with fewer benefits achieved. The policy will not facilitate new businesses start-ups or help future growth sectors. There will still be positive benefits associated with securing employment and training during construction, but these will be in the short to medium term. The benefits associated with mixed-use development will not be achieved including reduced commuting and inward investment from business.</p> <p>It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, race, religion and belief, sex, sexual orientation, age, pregnancy and maternity and disability. There would be no benefits in terms of employment generation.</p>																								
Alternative Policy: To not promote areas of the borough as creative hubs																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	?	+	0	0	0	?	+	?	?	?	0	0	0	-	-	0	0	0	-	-	-	0	0
<p>Impacts are uncertain in relation to social objectives. There will be a positive impact in that failure to protect creative industries could result in additional homes being delivered. However, the policy will have a negative impact in that there will be no benefits in terms of employment generation or movement towards a higher wage economy, and therefore the policy is less likely to reduce poverty and social exclusion in the long term.</p>																								

Impacts will be uncertain in relation to the environment. If parts of the borough are not promoted as creative hubs, residents will need to travel to work, which could place pressure on the transport network. This in turn will have a negative impact on air quality. However, there will also be less scope for noise and waste generation which can be associated with the operation of businesses.

Economic impacts will be largely negative in that this policy will not generate employment or investment in the borough, and will not help move towards a higher wage economy.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, race, religion and belief, sex, sexual orientation, age, pregnancy and maternity and disability. Although failure to protect the creative industries could result in additional homes being delivered, this does not outweigh the negative impacts on the local economy as there would be no benefits in terms of employment generation.

Policy BE2: Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS)

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	?	+	?	+	0	0	+	0	?	-	?	+	0	?	0	+	0	0	+	?	+	0	+

Impacts are predicted to be positive or uncertain in relation to social objectives. The policy has the potential to secure new employment floorspace which could in turn increase employment and prosperity, with associated benefits to health and well-being. In the short to medium term businesses may be displaced resulting in a loss of employment, making potential impacts uncertain. In terms of housing delivery this option will have significant positive impacts as it will result in additional housing. At the moment the majority of SIL and LSIS in the borough are in a poor environmental quality. Redevelopment will improve the quality of the environment but the benefits may be negated by the potential for noise concerns from co-locating residential and employment uses. Introducing residential into employment areas will increase footfall and overlooking on an evening which can increase feelings of safety and reduce crime.

Mixed environmental impacts are predicted. Co-location can reduce the need to travel to work which can have positive impacts. Each SIL and LSIS has been scored against I/A criteria to assess its sustainability for housing. Sites identified as suitable for co-location have good public transport accessibility levels, or will benefit from future planned investment in transport infrastructure. Development in these locations will be less reliant on private vehicles and place less pressure on the transport network.

By protecting some areas of SIL and LSIS for employment uses, this allows the potential for energy from waste and the circular economy. Increasing housing and employment will generate additional waste, making overall predicted impacts neutral.

Some of Brent's SIL and LSIS sites are adjacent the Grand Union Canal. Through redevelopment there is potential to enhance the waterfront and improve water quality and biodiversity through planting and green sustainable urban drainage systems. Therefore, potential positive impacts are uncertain in relation to criteria EN3.

Employment uses can generate noise and air pollution. Locating housing next to employment uses could have negative impacts on amenity and there will be a need for this to be carefully managed. Protecting some areas of SIL and LSIS for purely industrial uses allows uses which could have the most detrimental impacts to locate elsewhere.

Redevelopment could result in enhancements to landscape setting through the creation of a higher quality environment. There are a limited number of heritage assets within Brent's industrial areas. Other policies will protect these assets commensurate with their significance therefore impacts should be neutral.

Increased development will increase energy consumption. Intensification of uses does create the scope for district heating networks and modern development is required to meet higher sustainability standards, so there may be positive impacts associated with the redevelopment of older less efficient buildings.

This has potential to introduce sensitive residential development into areas of flood risk. However, a sites suitability for co-location has been informed by an assessment of potential flood risk, making overall impacts neutral. Modern development incorporating Sustainable Urban Drained Systems could help increase permeability and reduce flood risk.

This policy promotes the efficient use of brown field land, which could have positive impacts in reducing the need to develop on green field and open space. Redevelopment would also be subject to remediation of any contamination.

Economic impacts are anticipated to be predominantly positive. Housing has higher values and therefore can help subsidise the creation of new employment floorspace. This in turn can generate job opportunities. This policy balances facilitating investment in SIL and LSIS, whilst protecting some employment sites for businesses which are not suitable for co-location. During construction there is potential that some businesses will be displaced which could have negative impacts on employment in the short to medium term, but the

policy seeks to mitigate this by ensuring there are employment sites within the borough displaced businesses could relocate to. Co-location of employment and housing will have positive benefits in reducing commuting and improving access to employment.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation. The purpose of the policy is to ensure land is fully utilised both for employment and housing. This should benefit all groups. Creating mixed neighbourhoods can create sustainable places and reduce travelling times. However, the policy could have a positive impact on the protected characteristics of sex, pregnancy and maternity and disability as it may have particular benefits to those with caring responsibilities or those with limited mobility.

Alternative Policy : To allow co-location on all SIL and LSIS sites

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	?	+	?	+	0	0	-	-	?	-	?	+	0	?	-	+	0	0	-	-	-	0	+

Impacts are predicted to be positive or uncertain in relation to social objectives. The policy has the potential to secure new employment floorspace which could in turn increase employment, and have benefits for prosperity and health and well-being. Although in the short to medium term businesses may be displaced resulting in a loss of employment. In terms of housing delivery this option will have significant positive impacts as it will result in additional housing, including affordable housing. Redevelopment will improve the quality of the environment. The positive impacts may be negated by the potential for noise concerns by co-locating residential and employment uses. Particularly as this policy approach would not protect any employment sites solely for ‘bad neighbour’ employment uses. Introducing residential into employment areas will increase footfall and overlooking on an evening which can increase feelings of safety and reduce crime.

There are predicted significant negative environmental impacts. Co-location can reduce the need to travel to work which can have positive impacts. However, some areas of SIL and LSIS do not benefit from good public transport accessibility levels. Introducing housing into these locations will place further pressure on the transport network and increase congestion. For co-location to be acceptable on all SIL and LSIS waste management uses would need to relocate outside of the borough. This would mean Brent could not meet its waste apportionment and the potential for future growth sectors such as the circular economy and energy from waste will be reduced. Some of Brent’s SIL and LSIS sites are adjacent the Grand Union Canal. Brent’s industrial sites are heavily urbanised and generally dominated

by impermeable surfaces. Through redevelopment there is potential to enhance the waterfront and improve water quality and biodiversity through planting and green sustainable urban drainage systems.

Employment uses can generate noise and air pollution. Locating housing next to employment uses could have negative impacts on amenity and there will be a need for this to be carefully managed. If all areas of SIL and LSIS are developed for co-location it will be necessary for the more polluting uses to be located adjacent residential, with associated amenity impacts. Redevelopment could result in enhancements to landscape setting through the creation of a higher quality environment. Other policies will protect these assets commensurate with their significance therefore impacts should be neutral. Increased development will increase energy consumption. Although intensification of uses does create the scope for district heating networks. In addition, modern development is required to meet higher sustainability standards, so there may be benefits in encouraging the redevelopment of older less efficient buildings. Some SIL and LSIS sites are susceptible to flood risk and this option would introduce sensitive residential development into these locations. This has potential positive impacts as it minimises development on greenfield sites and will result in a more efficient use of brown field land. Redevelopment would also be subject to remediation of contamination.

Economic impacts are predicted to be predominantly negative. This policy can help facilitate investment in SIL and LSIS. Housing has higher values and therefore can help subsidise the creation of new employment floorspace. This in turn can generate job opportunities. Co-location of employment and housing can have positive impacts in reducing commuting and improving accessibility to employment. Some businesses are not suitable for co-location, due to the noise and odour they generate. If all SIL and LSIS was to be developed for mixed-uses some business would need to relocate outside of the borough, with associated job losses. This would also mean the borough could not meet its identified employment needs, particularly for general industrial uses and waste management.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, pregnancy and maternity, age, race, religion and belief, sex and sexual orientation and disability.

Alternative Policy: To protect all SIL and LSIS for employment use only

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	?	0

As this option is unlikely to change the current situation **social impacts are predicted to be neutral**. This option will not result in any additional housing. Although there may be piecemeal development, there is unlikely to be a comprehensive development for employment uses. Therefore, potential to improve environmental quality and feelings of safety under this option is considered to be neutral.

Predicted environmental impacts are largely neutral as this approach reflects the current situation. Continuing to separate housing from employment uses in SIL and LSIS will not reduce the need to travel to work. However, there will also not be an increase in private vehicle use associated with residential development. Overall impacts are therefore likely to be neutral. Protecting the sites as SIL and LSIS is unlikely to encourage environmental enhancements including planting which would benefit biodiversity and water quality. Employment uses can generate noise and air pollution. Locating housing next to employment uses could have negative impacts on amenity and there will be a need for this to be carefully managed.

Whilst this policy is unlikely to result in a significant increase in development which would generate greenhouse gas emissions, it also won't result in modern and more efficient buildings. Impacts are therefore uncertain.

Economic impacts will be neutral. This approach is unlikely to attract significant investment in SIL and LSIS, unless the supply of employment floorspace is constrained to the extent investment in intensification of employment uses becomes viable. Although this approach will protect existing businesses it is unlikely to promote intensification and the creation of new employment floorspace and associated job opportunities. This approach is the status quo, which to date has not resulted in the regeneration of SIL and LSIS through employment uses alone.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, race, sex and sexual orientation, disability. There would not be the benefit to all groups from increasing housing delivery and creating mixed communities.

Conclusion: The IIA indicates co-location on SIL and LSIS whilst retaining others for employment use will result in the most positive impacts. This option strikes the balance between the need to protect some SIL and LSIS for heavier industrial uses which are not suitable for co-location, whilst enabling co-location on others. A potential negative impact is the potential for the co-location of housing and employment uses to generate noise pollution. This will need to be mitigated through the detailed design of development. The policy wording highlights the need for it to be demonstrated suitable amenity will be provided for occupiers.

Policy BE3: Local Employment Sites and Work-Live																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+	++	+	+	+	+	+	-	+	0	?	+	0	0	0	+	+	0	+	+	+	0
<p>Impacts are predicted to be positive in relation to social objectives. Protecting employment sites across the borough will ensure local employment opportunities. This can help reduce inequalities, and in turn help improve health and well-being. This policy option will result in increased housing, including affordable housing. Encouraging investment through new development can help improve the quality of an area. Mixed-use development creates footfall and overlooking in areas throughout the day and evening. This can help improve feelings of safety and reduce crime. SMEs are an important part of an areas character. Protecting and retaining these businesses can help foster a sense of place and pride. Where local employment sites are located in town centres intensification of use will help to increase the population of the centre and help to support its vitality and viability.</p> <p>Impacts against environmental impacts are mixed but overall predicted to be positive. Protecting local employment sites ensures local employment opportunities are available, and can reduce the need to travel. Although increased intensification of use will increase the production of waste. Therefore, impacts are likely to be negative in relation to criteria E2.</p> <p>There is a risk in locating sensitive uses such as residential next to employment of impacts on amenity, particularly from noise. Given that space will be designed to modern sound insulation standards and be air quality neutral impacts on environmental health can be mitigated. Impacts overall are therefore likely to be neutral.</p> <p>Modern development will enhance the quality of the public realm, townscape and will integrate sustainable urban drainage systems which can help to improve water quality. Through redevelopment a net increase in biodiversity and green infrastructure is sought, but whether this constitutes a benefit will be dependent on the existing site and the level of planting and biodiversity already present. Impacts on biodiversity are therefore dependant on the nature of the site. Where a local employment site contains a heritage asset this will be protected as appropriate by policies elsewhere in the plan, so the impacts are likely to be neutral. Whilst increased intensity of use can increase energy consumption, modern buildings are designed to higher sustainability standards. Meaning overall impacts are likely to be neutral.</p>																								

Allowing more efficient use of land can help protect open space and greenfield sites from development pressure.

Impacts against economic impacts are predicted to be predominantly positive. In the short to medium term businesses may be displaced during development. Longer term this policy will have positive impacts by securing an increase in the amount of affordable workspace in the B use class (with makerspace prioritised to meet demand) as part of mixed-use developments which will help support business start-ups and create job opportunities. Work-Live development can also promote flexible working, which could be of particular benefit to those with caring responsibilities or disabled people with less mobility. This policy approach will help to attract investment to local employment sites. Mixed-use development and Work-Live development has the potential to reduce the need to travel, but only if those in the local community can benefit from employment opportunities.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, sexual orientation. The policy could have particular positive impacts on the protected characteristics of sex, race and disability, as women and BAME groups have higher levels of unemployment and the policy will result in the creation and retention of local employment opportunities. Additionally, the policy could benefit disabled people with less mobility and those with caring responsibilities.

Alternative Policy: To allow Local Employment Sites to be lost

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	++	+	-	-	0	-	0	+	+	?	+	0	0	0	+	+	0	-	-	-	0	-

Social impacts are predicted to be mixed, but predominantly negative. Loss of local employment sites will reduce employment opportunities in the borough. Lack of secure employment can impact negatively on health and well-being. This will result in increased housing, including affordable housing. Encouraging investment through new development can help improve the quality of an area.

A loss of employment uses will result in less activity in an area during the day, which can reduce feelings of safety, resulting in negative impacts.

Loss of local businesses can be detrimental to character and sense of place. Where local employment sites are located in town centres intensification of use will help to increase the population of the centre and help to support its vitality and viability. However, this

will be countered by a loss of employment uses which can draw people to town centres during the day and contribute to a centres offer.

Environmental impacts are predicted to be overall positive. Loss of local employment opportunities could increase the need to travel. Increased production of waste from residential development, may be cancelled out by loss of employment space. Overall impacts are therefore likely to be neutral

The development will replace existing employment space with space designed to meet modern standards, including being air quality neutral. The loss of employment uses can have positive impacts in terms of reducing noise and other forms of pollution. Modern development will enhance the quality of the public realm, townscape and will integrate sustainable urban drainage systems which can help to improve water quality. Through redevelopment a net increase in biodiversity and green infrastructure is sought, but whether this constitutes a benefit will be dependent on the existing site and the level of planting and biodiversity already present. Impacts on biodiversity are therefore dependant on the nature of the site. By allowing housing development on brownfield employment sites can help protect open space and greenfield land from development pressure.

Economic impacts are predicted to be negative. This policy approach would result in the loss of employment space which will be detrimental to the local economy and result in a loss in employment. This will result in a loss of locally accessible employment opportunities, which will increase the need to travel.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, disability, pregnancy and maternity, and sexual orientation. This policy could have a detrimental impact on groups with lower employment levels, including women and BAME groups by further reducing employment opportunities in the borough.

Alternative Policy: To protect all viable Local Employment Sites for employment use only

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	-	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	+

Social impacts are predicted to be mixed. Protecting employment sites across the borough will ensure local employment opportunities. This can help reduce inequalities, and in turn help improve health and well-being. Under this alternative policy there would be no increase in housing delivery. SMEs can be an important part of an areas character. Protecting and retaining these

businesses can help foster a sense of place and pride. Protecting local employment sites ensures local employment opportunities are available, and can reduce the need to travel.

Environmental impacts are predicted to be neutral. This alternative policy is unlikely to result in development and therefore improvements in townscape, water quality and green infrastructure will not be secured.

Economic impacts are predicted to be overall positive. This will have positive impacts as employment sites will be protected, there will be no displacement of businesses or short term loss in employment during construction. However, in mixed-use development higher value uses such as housing can help subsidise investment in employment space. Therefore, in the longer term it may result in lack of investment and ultimately employment sites becoming unviable. This will have positive impacts by protecting locally accessible employment opportunities, which could reduce the need to travel.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, race, sex and sexual orientation, disability.

Alternative Policy: To secure affordable workspace on site in all circumstances

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	+	+	+	-	+	0	?	+	0	0	0	+	+	0	?	?	+	0	+

Social impacts are predicted to be positive. Protecting employment sites across the borough will ensure local employment opportunities are protected. This can help reduce inequalities, and in turn help improve health and well-being. This will result in increased housing, including affordable housing. Encouraging investment through new development can help improve the quality of an area. Mixed-use development creates footfall and overlooking in areas throughout the day and evening. This can help improve feelings of safety and reduce crime. SMEs can be an important part of an areas character. Protecting and retaining these businesses can help foster a sense of place and pride. Where local employment sites are located in town centres intensification of use will help to increase the population of the centre and help to support its vitality and viability. Protecting local employment sites ensures local employment opportunities are available, and can reduce the need to travel. On the other hand, requiring affordable workspace in mixed use developments may result in lower levels of affordable housing being achieved as from a viability perspective reducing rents on workspace will result in income being available overall from the employment element of the scheme, which might need to be cross-subsidised through income generated from residential elements. It may also reduce the viability of replacing existing employment

space with higher specification space, as margins on development will be reduced. Increased intensification of use will increase the production of waste.

Environmental impacts are predicted to be mixed. The development will replace existing employment space with space designed to meet modern standards, including being air quality neutral. There is a risk in locating sensitive uses such as residential next to employment of impacts on amenity, particularly from noise. Given that space will be designed to modern sound insulation standards this can be mitigated. Impacts overall are therefore likely to be neutral. The loss of employment uses can have positive impacts in terms of reducing noise and other forms of pollution. Modern development will enhance the quality of the public realm, townscape and will integrate sustainable urban drainage systems which can help to improve water quality. Through redevelopment a net increase in biodiversity and green infrastructure is sought, but whether this constitutes a benefit will be dependent on the existing site and the level of planting and biodiversity already present. Impacts on biodiversity are therefore dependant on the nature of the site. Allowing more efficient use of land can help protect open space and greenfield sites from development pressure.

Economic impacts are uncertain. Workspace will be distributed across the borough, resulting in local employment opportunities. A risk is that creating affordable workspace in unviable locations results in vacant space which is ultimately converted to other uses. This will have positive impacts by protecting locally accessible employment opportunities, which could reduce the need to travel. Alternatively, the additional cost of providing affordable workspace may discourage investment in updated existing poor quality stock as margins will be reduced which might make this a less attractive prospect for a developer.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, race, sex and sexual orientation, disability.

Conclusion

The IIA indicates the preferred policy option will result in the most positive social, economic and environmental impacts. A negative potential impact could be noise pollution due to the co-location of uses, and this will need to be managed through detailed design. The alternative option to secure affordable workspace on-site in all circumstances also score positively, but impacts are more uncertain as the policy may result in workspace in locations where there is no demand, or undermining investment in renewal of older industrial stock with better quality premises that meet modern-day requirements due to reductions in viability. If this space remains vacant positive impacts will not be realised.

Policy: BE4 SUPPORTING STRONG CENTRES																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	0	+	+	0/+	0	++	?/+	0	n/a	0	n/a	0	0	n/a	n/a	n/a	n/a	n/a	+	0	?	?
<p>Impacts are positive in relation to social inclusion, housing, providing a high quality environment, maintaining and enhancing the borough's town centres and promoting sustainable economic growth. By clearly setting out which parts of town centres will be acceptable for residential development, the policy will provide an opportunity to increase housing supply in the borough. Limiting non A1 or A2 uses and the promotion of meanwhile uses in vacant space will improve residents' amenity and sense of place as well as making neighbourhoods better places to live. Access to sufficient and appropriate shops is a key aspect of social exclusion. The key effect of this policy will be its impact on the vitality and viability of town centres. By allowing for diversification of the high street, this policy will improve accessibility to key local services which can be located in town centres, and will also make access easier for those without access to a car due to the relatively high levels of public transport accessibility found in town centres. Supporting residential conversion in town centres will allow the development of high quality, well-connected housing to encourage sustainable travel by walking, cycling and public transport. The policy will promote regeneration and business development by encouraging meanwhile uses, which can enhance the impact of an area as a business location by diversifying the types of businesses on the high street.</p> <p>Impacts are neutral in relation to health inequalities, crime reduction, a sense of community, reducing waste, minimising air, noise and light pollution, enhancing the borough's landscape and townscape, protecting historic and cultural assets, reducing unemployment and encouraging efficient infrastructure to support economic growth. Although the policy has potential to reduce crime and anti-social behaviour by diversifying the uses in centres and preventing an overconcentration of uses associated with anti-social behaviour, this is a long-term possibility and dependent on other factors. Similarly, the policy may foster a sense of pride in an area by improving its vitality although this is not a significant impact.</p> <p>The policy will have uncertain impacts in relation to traffic reduction, facilitating indigenous and inward investment and maximising 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. Where journeys to</p>																								

other centres are offset by availability of non-retail uses locally, positive effects are likely. However, an increase in activity within these areas may generate a net increase in traffic overall. There are possible employment opportunities in new town centre uses, and inward investment may be encouraged by policy seeking to manage and facilitate new uses.

This policy is not applicable to objectives relating to water quality, natural habitats, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity.

Alternative Policy: No policy to support the role of town centres

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	-	!	!	0	0	n/a	0	n/a	0	0	n/a	n/a	n/a	n/a	n/a	!	0	-	?	0

Impacts are slightly positive in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs. By not protecting town centres for main town centre uses, it is likely that the policy would increase housing supply in the borough as premises were converted to residential use or demolished for new residential schemes to come forward.

Impacts are neutral in relation to traffic reduction, reducing waste, minimising air, noise and light pollution, protecting and enhancing the borough’s landscape and townscape, protecting and enhancing the historic environment and cultural assets, reducing unemployment and encouraging efficient infrastructure to support economic growth.

Impacts are negative in relation to social inclusion, reducing health inequalities, providing a high quality environment, crime reduction, and facilitating indigenous and inward investment within the borough. Impacts are very negative in relation to encouraging a shared sense of community and cultural identity, maintaining and enhancing the role and vitality and viability of Brent’s town centres and promoting sustainable economic growth. Access to sufficient and appropriate shops is a key aspect of social inclusion, particularly among Brent’s older population. With no protection for retail uses in town centres social inclusion would be negatively impacted. Without a policy to set out what is appropriate town centre development it is likely that there would be a proliferation of employment types such as takeaways and betting shops which would negatively affect the vitality and viability of

Brent's town centres as well as limiting resident's access to sufficient and appropriate shops. Retail uses would diminish and negatively impact the sense of place in the borough's town centres.

Impacts are uncertain in relation to maximising the potential for everybody to contribute economically. While some employment opportunities may be lost through the conversion of business premises to residential, without a policy to restrict certain use classes it is possible that new businesses would open and provide employment opportunities.

This policy is not applicable to objectives relating to water quality, natural habitats, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity. This policy could have a negative impact on the protected characteristic of age, as it could be particularly detrimental to older populations, who are dependent on sufficient access to appropriate shops.

Alternative Policy: To permit all new non-A1 or A2 uses within town centres, with no restriction on A4 and A5 uses within Primary Shopping Frontages and no requirement for a Retail Impact Assessment

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	-	!	!	0	0	n/a	0	n/a	0	0	n/a	n/a	n/a	n/a	n/a	-	0	-	?	0

Impacts are slightly positive in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs. By not protecting town centres for main town centre uses, it is likely that the policy would increase housing supply in the borough as premises were converted to residential use or demolished for new residential schemes to come forward.

Impacts are neutral in relation to traffic reduction, reducing waste, minimising air, noise and light pollution, protecting and enhancing the borough's landscape and townscape, protecting and enhancing the historic environment and cultural assets, reducing unemployment and encouraging efficient infrastructure to support economic growth.

Impacts are negative in relation to social inclusion, reducing health inequalities, providing a high quality environment, crime reduction, and facilitating indigenous and inward investment within the borough. Impacts are very negative in relation to

encouraging a shared sense of community and cultural identity, maintaining and enhancing the role and vitality and viability of Brent's town centres and promoting sustainable economic growth. Access to sufficient and appropriate shops is a key aspect of social inclusion, particularly among Brent's older population. With no protection for retail uses in town centres social inclusion would be negatively impacted. Without a policy to set out what is appropriate town centre development it is likely that there would be a proliferation of employment types such as takeaways and betting shops which would negatively affect the vitality and viability of Brent's town centres as well as limiting resident's access to sufficient and appropriate shops. Retail uses would diminish and negatively impact the sense of place in the borough's town centres.

Impacts are uncertain in relation to maximising the potential for everybody to contribute economically. While some employment opportunities may be lost through the conversion of business premises to residential, without a policy to restrict certain use classes it is possible that new businesses would open and provide employment opportunities.

This policy is not applicable to objectives relating to water quality, natural habitats, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity. This policy could be particularly negative to older populations, who are dependent on sufficient access to appropriate shops.

Alternative Policy: To refuse all applications for non-A1 or A2 uses within town centres

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	!	-	-	!	!	0	0	n/a	0	n/a	0	0	n/a	n/a	n/a	n/a	n/a	!	0	-	?	0

Impacts are neutral in relation to traffic reduction, reducing waste, minimising air, noise and light pollution, protecting and enhancing the borough's landscape and townscape, protecting and enhancing the historic environment and cultural assets, reducing unemployment and encouraging efficient infrastructure to support economic growth.

Impacts are negative in relation to social inclusion, reducing health inequalities, providing a high quality environment, crime reduction, and facilitating indigenous and inward investment within the borough. Impacts are very negative in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs, encouraging a shared

sense of community and cultural identity, maintaining and enhancing the role and vitality and viability of Brent's town centres and promoting sustainable economic growth. Refusing all non-A1 and A2 uses would negatively impact housing supply in Brent as town centres are proposed to be key locations for future housing growth due to their relatively high levels of public transport accessibility and access to shops and services. Not allowing other commercial uses within centres may mean that the vitality and viability of the centre is undermined to its long term detriment. It is clear that retail patterns are changing and as such other uses will be appropriate in town centre frontages to support to the centre, subject to this not unacceptably displacing viable retailers.

Impacts are uncertain in relation to maximising the potential for everybody to contribute economically. While the retail role of the town centre would be protected, refusing all applications for residential use would limit the number of people passing through Brent's centres and therefore negatively impact economic growth, reducing the number of jobs available. It could also result in vacant premises where retailers are not available, thus meaning opportunities for alternative occupation by successful businesses is denied.

This policy is not applicable to objectives relating to water quality, natural habitats, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity. Depending on the strength of a centre it might result in empty premises that could otherwise be used for commercial occupiers, thus providing jobs, or in very poorly performing centres, the loss of additional residential accommodation.

Conclusion: The restriction of A4 and A5 uses within Primary Shopping Frontages in Brent's town centres is necessary to protect the retail core of the high street and maintain access to appropriate and sufficient shops and services. The assessment indicates the preferred policy option has a number of positive impacts which the reasonable alternatives do not. While national and regional policy may offer some guidance in this area, the preferred policy option adds Brent-specific detail to this issue, allowing the council to guide development in the way which best suits Brent's needs.

Policy: BE5 PROTECTING RETAIL IN TOWN CENTRES

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	0/+	+	++	+/-	0	n/a	0	n/a	0/+	n/a	n/a	n/a	n/a	n/a	n/a	+	?	+	0	0

Impacts are positive in relation to social inclusion, health inequalities, providing a high quality environment, a sense of community, maintaining and enhancing the borough's town centres, promoting sustainable economic growth and facilitating indigenous and inward investment. Access to sufficient and appropriate shops is a key aspect of social exclusion, while preventing an overconcentration of takeaways and shisha cafes in proximity to schools will encourage healthy lifestyle choices and support initiatives to address health inequalities. By managing and encouraging appropriate non-retail uses the vitality and maintenance of centres can be improved. Diversifying centres is likely to boost local economic activity and make the borough a more attractive place to live and work. While this policy may restrict the development new takeaways, betting shops and pawnbrokers which generate employment, preventing an overconcentration of these uses will also support more viable centres. By diversifying the uses in centres and preventing an overconcentration of uses associated with anti-social behaviour it is possible that positive effects on crime and anti-social behaviour will be seen in the long term where the amount of pedestrian traffic and variety of people using these spaces increases. The limitation of takeaways near schools will have some benefits in reducing the potential for some younger people to be overweight.

Impacts are neutral in relation to reducing waste, minimising air, noise and light pollution, maximising the potential for everybody to contribute economically through increasing and improving the provision of access to childcare, education and training facilities, volunteering opportunities and informal employment.

The policy will have an uncertain effect in terms of reducing the effect of traffic on the environment. Where journeys to other centres are offset or negated by availability of retail uses locally, positive effects are likely. However, an increase in activity within these areas may generate a net increase in traffic overall.

This policy is not applicable to objectives relating to housing, water quality, natural habitats, protecting historic and cultural assets, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. This policy will have a particularly positive impact on the protected characteristic of age, disability and pregnancy and maternity, as older residents or those with limited mobility often rely on the shops in town centres and may have difficulty travelling to out of centre locations. In addition, younger people are less likely to eat fast food when the offer of takeaways in close proximity to schools is either greatly reduced, or non-existent.

Alternative Policy: No policy to restrict non-retail uses

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		-	-	+	!	-	-	!	0	0	n/a	0	n/a	0	n/a	n/a	n/a	n/a	n/a	n/a	-	?	?	0
<p>Impacts are slightly positive in relation to providing everybody with the opportunity to live in a home which is suitable to their identified needs. By not protecting town centres for main town centre uses, it is likely that the policy would increase housing supply in the borough as premises were converted to residential use or demolished for new residential schemes to come forward.</p> <p>Impacts are neutral in relation to traffic reduction, waste reduction, minimising air, noise and light pollution, creating, enhancing and maintaining the borough's landscape and townscape, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support growth.</p> <p>Impacts are negative in relation to social inclusion, reducing health inequalities, providing a healthy, safe, high quality environment, enhancing community safety by reducing crime, encouraging a shared sense of community, maintaining and enhancing the role and vitality and viability of Brent's town centres and promoting sustainable economic growth. Access to sufficient and appropriate shops is a key aspect of social inclusion, particularly among Brent's older population. With no protection for retail uses in town centres social inclusion would be negatively impacted. Without a policy to set out what is appropriate town centre development it is likely that there would be a proliferation of employment types such as takeaways and betting shops which would negatively affect the vitality and viability of Brent's town centres as well as limiting resident's access to sufficient and appropriate shops. Retail uses would diminish and negatively impact the sense of place in the borough's town centres.</p> <p>Impacts are uncertain in relation to offering everybody the opportunity for rewarding and satisfying employment and facilitating indigenous and inward investment.</p> <p>This policy is not applicable to objectives relating to water quality, natural habitats, protecting and enhancing the historic environment and cultural assets, climate change and greenhouse gases, soil quality, protecting open space and flood risk reduction.</p> <p>It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. This policy will have negative impacts on the protected characteristics of age, disability and pregnancy and maternity, as older residents or those with limited mobility often rely on the shops in town centres and may have difficulty travelling to out of centre locations. In</p>																								

addition, younger people will have greater opportunity to eat fast food as the offer of takeaways overall and in close proximity to schools is greatly increased.

Conclusion: It is important to ensure there is not an over-concentration of particular uses within any single length of frontage, an approach supported by national and regional policy as well as a growing evidence base. The preferred policy option would have several positive effects not seen in the reasonable alternative. In order to maintain a diverse and viable high street offer it is considered that the preferred policy option is the most suitable for Brent.

Policy: BE6 NEIGHBOURHOOD PARADES AND ISOLATED SHOP UNITS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	n/a	+	?	+	++	?	n/a	n/a	0	n/a	0	n/a	n/a	n/a	n/a	n/a	n/a	+	0	0	0	n/a

Impacts are positive in relation to social inclusion, providing a high quality environment, a sense of community, maintaining and enhancing the borough’s town centres and improving accessibility to a range of services and facilities and promoting sustainable economic growth and regeneration. Access to sufficient and appropriate shops is a key aspect of social exclusion. Local shopping parades and markets can act as an important social resource and provide opportunities for social interaction for people who may have limited contacts with others in their day-to-day lives. Local and neighbourhood shopping parades and centres can be an important focus of the local economy, and maintain local economic multiplier effects bringing significant local benefit.

Impacts are neutral in relation to health inequalities minimising air, noise and light pollution, enhancing the borough’s landscape and townscape, reducing unemployment, facilitating indigenous and inward investment within the borough and maximising the potential for everybody to contribute economically.

Impacts are uncertain in relation to enhancing community safety and reducing the effect of traffic on the environment through reducing the need to travel. Active and maintained local shopping parades can act as a community focus, though also a gathering point for youths and the possibility of anti-social behaviour. This possibility is likely to be minimised where parades are busy and well maintained. Where this is the case, a busy parade which provides for a good range of needs can reduce the need to travel further afield.

The policy is not applicable to objectives relating to housing, reducing waste, water quality, natural habitats, protecting historic and cultural assets, climate change and greenhouse gases, soil quality, protecting open space, flood risk reduction and encouraging efficient infrastructure to support economic growth.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. The policy will have positive effects on the protected characteristic of age, disability, and pregnancy and maternity, as older residents and those with limited mobility often rely on local shops in neighbourhood parades.

Alternative Policy: No policy regarding neighbourhood parades and isolated shop units

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	n/a	-	?	-	-	-	n/a	n/a	0	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a	-	0	0	0	n/a

Not having a policy is considered to be predominantly negative in terms of social impacts. Not having a policy around Brent's neighbourhood parades and isolated shop units could result in the loss of individual shop units, which could also result in harmful gaps in neighbourhood parades. The loss of these resources could have negative impacts in terms of social exclusion, as these parades can act as an important social resource and provide opportunities for social interaction for people who may have limited contact with others in their day-to-day lives. Active and maintained local shopping parades can act as a community focus, though also a gathering point for youths and the possibility of anti-social behaviour. This possibility is likely to be minimised where parades are busy and well maintained. Where this is the case, a busy parade which provides for a good range of needs can reduce the need to travel further afield.

Not having a policy is considered to be slightly negative in terms of economic impacts. Local and neighbourhood shopping parades and centres can be an important focus of the local economy, and maintain local economic multiplier effects bringing significant local benefit. As not having a policy could result in the loss of these resources, this could have negative economic impacts.

Not having a policy is considered to be predominantly negative in terms of environmental impacts. Not having a policy could result in the loss of these important resources. This could result in increased car usage, as residents travel further to the resources

they need. There could also be a negative impact in terms of townscape, as the loss of units in parades ca create gaps, and well-maintained and busy parades are less likely to be a gathering point for youths and the possibility of anti-social behaviour.

It is considered that not having a policy regarding neighbourhood parades and isolated shop units would have a neutral impact on the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. However, the policy could have a negative impact on the protected characteristics of age, disability and pregnancy and maternity. This is because these groups often rely on local shops in neighbourhood parades, and not having a policy may result in the loss of such parades and shop units.

Conclusion: This policy proposes to largely take forward the existing policy in the Brent Local Plan that relates to Neighbourhood Parades and Isolated Shop Units DMP4. It is important to ensure that neighbourhood parades and isolated shop units are managed such that their loss is prevented (unless exceptions are met), thus contributing towards sustainable communities and ensure that convenient access to goods it available to those who need them. Not having a policy could result in the loss of important resources within communities. As such, no changes to the existing policy are proposed.

Policy: BE7 SHOPFRONT DESIGN AND FORECOURT TRADING

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	n/a	n/a	n/a	+	n/a	+	0	n/a	n/a	n/a	n/a	n/a	n/a	+/-	++	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Impacts are positive in relation to providing a high quality environment for borough residents to live, work and enjoy, encouraging a shared sense of community and protecting and enhancing historic and cultural assets. The retention of Brent’s heritage assets will help to provide a high quality streetscape and sense of place. This can provide Brent’s various communities with a shared sense of community and cultural identity.

Impacts are mixed in relation to creating and maintaining an attractive and clean environment, including protecting and enhancing the borough’s townscape. Although the retention of Brent’s historic shopfronts would contribute to an attractive townscape, there is a possibility that permitting forecourt trading could decrease the quality of the environment by allowing shops to spill out into public space with no controls on visual amenity.

This policy is not applicable to objectives relating to social inclusion, health inequalities, housing, reducing crime, reducing traffic, reducing waste production, water quality, minimising air, noise and light pollution, natural habitats, climate change and greenhouse gas emissions, soil quality, open spaces, flood risk reduction, economic growth and regeneration, employment, facilitating indigenous and inward investment, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. The policy will have positive impacts on the protected characteristics of age, disability, pregnancy and maternity as by ensuring forecourts don't create street clutter will help ensure easily navigable routes for those in wheelchairs and with pushchairs. The associated shopfront design guide also contains information on seeking door widths that can accommodate these protected groups, plus advice on colour contrasts to help those with a visual impairment.

Alternative policy: No policy regarding shopfront design and forecourt trading

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	n/a	n/a	n/a	-	n/a	-	-	n/a	n/a	n/a	n/a	n/a	-	-	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

In relation to social criteria, impacts of not having a policy are considered to be mainly negative. Not having a policy to manage shopfront design and forecourt trading could result in a lower quality streetscape and sense of place. This could detrimentally impact various communities' shared sense of community.

In relation to environmental criteria, impacts of not having a policy are considered to be mainly negative. Although there is a risk that permitting forecourt trading could decrease the quality of the environment by allowing shops to spill out into public space, the lack of a policy to support the retention of Brent's historic shopfronts would have negative impact on the appearance of Brent's townscapes.

The following are not considered to be applicable to this policy: economic growth and regeneration, employment, facilitating indigenous and inward investment, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.

It is considered that not having a policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, religion and belief, race, sex and sexual orientation. Not having a policy is likely to have a negative impact on the following protected characteristics: age, disability, pregnancy and maternity, as the lack of a policy could result in increased street clutter and non-easily navigable routes for those in wheelchairs and with pushchairs.

Conclusion: This policy proposes to take forward the existing policy in the Brent Local Plan that relates to Shopfront Design and Forecourt Trading DMP4A. Shopfronts play a key role in establishing the character of Brent’s town centres and neighbourhood parades. The existing policy ensures shop fronts and forecourts contribute to an attractive environment. Not having a policy could result in poor environments and detrimental impacts to the character and viability of Brent’s town centres. As such, no changes to the existing policy are proposed.

Policy: BE8 MARKETS AND CAR BOOT SALES

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	n/a	n/a	+	?	++	++	0	+	n/a	n/a	n/a	0	0	n/a	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a

Impacts are positive in relation to social inclusion, providing a safe, high quality and healthy environment, encouraging a shared sense of community, maintaining and enhancing the role and vitality and viability of Brent’s town centres, waste reduction, sustainable economic growth, reducing unemployment and facilitating indigenous and inward investment. Local markets can act as an important social resource and provide opportunities for social interaction for people who may have limited contact with others in their day-to-day lives. Local markets can also reduce the need to travel further afield for fresh produce, positively impacting on traffic levels in the borough. Local markets and car boot sales can also help sustain the local economy, bringing shoppers into town centres and maintaining local multiplier effects, bringing significant local benefit.

Impacts are neutral in relation to traffic reduction, protecting the borough’s landscape and townscape and protecting and enhancing the historic environment and cultural assets.

Impacts are uncertain in relation to crime reduction. Although the vast majority of traders are likely to be selling genuine second-hand goods, it is possible that car boot sales could provide an accessible local market for stolen goods such as consumer electrics/mobile phones.

The policy is not applicable to objectives relating to health inequalities, providing everybody with the opportunity to live in a home which is suitable to their identified needs, water quality, minimising air, noise and light pollution, natural habitats, mitigating against the impacts of climate change, soil quality, open space, flood risk reduction, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity.

Alternative Policy: no policy to manage markets

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	n/a	n/a	-	?	-	-	-	0	n/a	n/a	n/a	0	0	n/a	n/a	n/a	n/a	n/a	-	-	-	n/a	n/a

Social Impacts are mainly considered to be negative. Local markets can act as important social resources, providing opportunities for social interaction for people who have limited contact with others in their day-to-day lives. Local markets can also reduce the need to travel further afield for fresh produce, and can bring shoppers into town centres, maintaining local multiplier effects and bringing significant local benefit. Not having a policy to manage markets may result in the loss of existing retail markets or result in the lack of improvement in existing markets, resulting in the loss of these important social resources, reducing opportunities for social interaction.

Environmental impacts are mixed. It is considered that the loss of local markets may have a negative impact on traffic generation, as the loss of local resources may result in an increased need to travel.

Economic impacts are considered to be negative. Not having a policy to manage the provision of markets may result in the loss of existing retail markets or result in new markets being created in unsuitable locations. This in turn may result in the loss of these important economic resources which can provide employment opportunities for local people and business start-ups.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity.

Conclusion: Not having a policy would not be appropriate, as it would not be regarded as being in general conformity with the London Plan or the NPPF. The preferred policy proposes to take forward the existing policy in the Brent Local Plan that relates to Markets and Car Boot Sales DMP5. No changes to the policy are proposed. It is included for completeness.

Policy: BE9 VISITOR ACCOMMODATION AND ATTRACTIONS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	n/a	+	0	n/a	n/a	++	+	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	+	+	n/a

Impacts are positive in relation to housing, maintaining and enhancing the role and vitality and viability of Brent’s town centres, traffic reduction, promoting sustainable economic growth, reducing unemployment and facilitating indigenous and inward investment within the borough. Ensuring visitor accommodation is managed as short-term accommodation and not permanently occupied prevents the development of inappropriate residential development which does not provide suitable amenity standards, as well as protecting sites which are needed to meet housing need from being developed for visitor accommodation. Visitor accommodation and attractions make an important contribution to Brent’s economy, generating local employment and attracting visitors to the area which benefits existing businesses. By guiding visitor accommodation and hotel development to Wembley and Kilburn where public transport accessibility levels are high, there should be lower levels of vehicular trips generated than if there was no restriction on where facilities could be located.

Impacts are neutral in relation to social inclusion, providing a safe, high-quality and healthy environment, and protecting the borough’s landscape and townscape.

This policy is not applicable to objectives relating to health inequalities, crime reduction, encouraging a shared sense of community, waste reduction, water quality, minimising air, noise and light pollution, natural habitats, protecting the historic environment, mitigating the impacts of climate change, soil quality, open space, flood risk reduction, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation, pregnancy and maternity. It will have positive impacts on the protected characteristic disability as it will ensure visitor accommodation meets accessibility standards.

Alternative policy: No policy to manage hotels and other visitor accommodation																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		0	n/a	-	0	n/a	n/a	+	-	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	n/a	n/a	n/a	+	+	+	n/a
<p>Impacts are positive in relation to maintaining and enhancing the role and vitality and viability of Brent's town centres, promoting sustainable economic growth, reducing unemployment and facilitating indigenous and inward investment within the borough. Visitor accommodation and attractions make an important contribution to Brent's economy, generating local employment and attracting visitors to the area which benefits existing businesses.</p> <p>Impacts are neutral in relation to social inclusion, providing a safe, high-quality and healthy environment, and protecting the borough's landscape and townscape.</p> <p>Impacts are negative in relation to ensuring everyone has the opportunity to live in a home which is suitable to their needs and traffic reduction. Without adequate conditions attached to hotel development there is a risk that they could become permanently occupied which would not provide suitable amenity standards for residents. Without a policy to guide hotels and visitor accommodation to areas of the borough with high public transport accessibility levels there will be an increase in vehicular trips.</p> <p>This policy is not applicable to objectives relating to health inequalities, crime reduction, encouraging a shared sense of community, waste reduction, water quality, minimising air, noise and light pollution, natural habitats, protecting the historic environment, mitigating the impacts of climate change, soil quality, open space, flood risk reduction, maximising the potential for everybody to contribute economically and encouraging efficient infrastructure to support economic growth.</p> <p>It is considered that this policy will have neutral impacts people who have the following protected characteristics: gender reassignment, marriage and civil partnership, race, religion and belief, race, sex and sexual orientation, disability, pregnancy and maternity.</p> <p>Conclusion: The GLA has forecast significant future demand for service accommodation over the Local Plan period and it is important to have a policy in place to ensure this development is located in the most appropriate parts of the borough. The preferred policy option also places conditions on hotels to prevent them from becoming permanent accommodation for residents, which would not</p>																								

provide sufficient amenity space. It is considered that the preferred policy option offers benefits to the borough which the reasonable alternative does not, and so is the most suitable policy option for Brent.

Heritage and Culture

Policy: BHC1 BRENT'S HERITAGE ASSETS																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		0	0	0	+	0	+	0	0	+	0	0	0	0	++	+	0	0	0	0	0	0	0	0
<p>The policy will have significant positive impacts in relation to historic environment and positive impacts in relation to quality of surroundings, diversity, waste and townscape. The policy will seek to ensure that Brent's heritage assets are identified, understood, protected and enhanced and where demolition is unavoidable that an understanding of the quality of the replacement is clear. This will have significant benefits in protecting the historic environment. The policy will ensure that a high quality environment in Brent is maintained or enhanced. Heritage assets are usually valued buildings, often of civic importance that can be closely aligned to different groups, such as places of worship or ethnic groups. As such their retention or enhancement is part of the evidence of a diverse society which can effectively meet the needs of all residents. The reuse of buildings is more likely to reduce waste through demolition. The increased protection of the historic environment is likely to have associated positive impacts on townscape.</p> <p>The policy will have neutral impacts on social inclusion, health, homes that meet needs, accessibility, community safety, bio-diversity, and open spaces, traffic, water, air pollution, soil, greenhouse gas emissions, climate change, flood risk, employment opportunities, education, diversity and skills and infrastructure. Although it may impact on some of these elements, where there are impacts these will either be negligible positives or negatives.</p> <p>In relation to disability, pregnancy and maternity and age, there might be slight negative impact. With regards to race, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on these groups. The policy seeks to ensure protection and enhancement of heritage assets. Very infrequently this may result in buildings/ places not being able to be adapted to meet the needs of those with limited mobility due to the potential harm it would cause to the heritage asset. These circumstances are reducing as more innovative ways of dealing with matters are delivered.</p>																								
Alternative policy: No policy, rely on the London Plan policy																								

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	?	0	?	0	0	?	0	0	0	0	?	?	0	0	0	0	0	0	0	0	0

Not having a policy regarding Brent’s heritage assets would have uncertain social, economic and environmental impacts, as insufficient clarity would be given on how development impacting heritage assets will be assessed by the council. Additionally, not having a policy (or relying on the London Plan policy) would not be consistent with the statutory requirement to preserve or enhance nationally recognised heritage assets.

It is uncertain how the lack of a policy regarding heritage assets would impact on the following protected groups: disability, pregnancy and maternity, age, race, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation. Not having a policy means that insufficient clarity would be given on how development impacting heritage assets would be assessed by the council.

Policy: BHC2 NATIONAL STADIUM WEMBLEY

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	+	+	++	0	+	0	0	+	0	0	++	0	0	0	0	0	0	0	0	0	0

The policy will have significant positive impacts in relation to population diversity/ culture and to quality of surroundings and townscape. It will have minor positive effects on community safety, traffic and noise. The policy will seek to ensure that the architectural integrity of the stadium is maintained/ enhanced and that the views of the national stadium from key locations are protected. This will maintain the design by Sir Richard Rogers and allow for its potential as a listed building to be considered in the future. Maintaining views will continue the associated prominence as a local landmark. It will enhance the sense of place within Brent and orientation, whilst protecting and enhancing the setting of the stadium within the Borough. The protection of the 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 types of fans to a variety of national and leading club games. The control on the number of capacity events allows for proper consideration of issues such as policing/ community safety and traffic management to be addressed to the benefit of attendees and the local community.

The policy will have neutral impacts on social inclusion, health, homes that meet needs, accessibility, bio-diversity and open spaces, water, soil, greenhouse gas emissions, climate change, flood risk, employment opportunities, education and skills and infrastructure. Although it may impact on some of these elements, where there are impacts these will either be negligible positives or negatives.

With regards to race, disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on these groups. The stadium's use can be representative of the whole population, or for specific groups can meet particular needs at particular times. The policy is to ensure that the stadium remains competitive as a venue, retains importance as a national cultural icon and landmark.

Alternative Policy: No policy.

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	-	-	-	0	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0

The policy is not seen to have any positive impacts.

The policy will have negative impacts associated with quality of surroundings, crime, community identity, townscape, and heritage. By having no policy, the protected view of the stadium will be compromised, incurring inappropriate development which will obscure the stadium, reducing the resident's sense of place and pride for an area.

This policy is anticipated to have neutral impacts on social inclusion, well-being, housing, accessibility, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaptation, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

On race, disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation a lack of policy will have a neutral impact on those with a protected characteristic.

Alternative Policy: Reduction or increase in number of identified views

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	-	-	-	-	0	0	0	0	0	0	-	-	0	0	0	0	0	-	0	-	0	0

This policy is expected to negatively impact quality of surroundings, crime, community identity, townscape, heritage, regeneration, and investment. The current views have been identified to provide views from all appropriate vantage points, often from transport networks in which people visiting the stadium will be arriving by. These views have been well preserved and have presented themselves as sufficient to uphold the stadium's symbolic status as the national football stadium. Identifying other views will be unlikely to present any new, overlooked opportunities due to recent development. If identified the new views would prevent potential development from occurring, reducing housing provision in these corridors. If the scope was decreased, some neighbourhoods would lose valuable views, reducing their sense of place, quality of surroundings, community identity and townscape. The resulting reduction in significance of the stadium will serve to decrease local investment within the area, impacting upon potential regeneration.

This policy will have negative impacts on social inclusion, well-being, accessibility, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, employment, education, and efficient infrastructure.

With regards to disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation, not having a policy will have a neutral impact on these groups.

Alternative Policy: Greater restriction, or less control on activities or development of the stadium

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	0	-	-	-	0	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0

The policy will have negative impacts associated with quality of surroundings, crime, community identity, townscape, and heritage. A change in the restrictions held upon the stadium will likely result in changes in the amount of people visiting the stadium which could rise with less control and reduce with increased control. This will impact upon the viability of the stadium, impacting upon its performance as a national venue, reducing the quality of the surroundings, which combined with an increase in people visiting, may increase crime rates. The change in control of development around the stadium may alter its perception in the public eye, reducing its prominence if over developed or increasing if enhanced as a heritage asset.

This policy will have negative impacts on social inclusion, well-being, accessibility, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaptation, land and soil, open spaces, flood risk, regeneration, employment, investment, education, and efficient infrastructure.

With regards to disability, age, race, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, religion and belief and sexual orientation the policy will have a neutral impact on these groups.

Conclusion: The proposed policy is seen to be most appropriate for Brent, bringing with it a number of potentially positive benefits. The proposed policy seeks to protect and enhance the stadium as a national and local asset without impacting too heavily upon local development. The stadium provides surrounding communities with a sense of identity and pride at a local and national level which is important in increasing social cohesion.

Preferred Policy: BHC3: SUPPORTING BRENT'S CULTURE AND CREATIVE INDUSTRIES

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	0	+	0	+	+	0	0	0	0	0	+	+	0	0	0	0	0	0	+	+	0	0

The policy will have minor positive impacts in relation to social inclusion, quality of surroundings, population diversity/ culture, town centres and to quality of surroundings and townscape, cultural assets, growth and regeneration and investment. This policy is designed to enhance local culture and encourage the creation of a creative industries hub at Willesden Green and any potential future zones. As the London borough of culture 2020 it will be of particular importance for the council to embrace this policy, encouraging the expression of, and involvement in, cultural and creative activities wherever possible. Involvement in these practices will help the council meet a range of borough objectives, including to increase social inclusion/cohesion, reduce crime rates, and increase accessibility to a range of services, including the creative. Through initiatives it will also be possible to improve the general environment and quality of surroundings in the borough through the introduction of art which itself will help create a sense of place and pride for an area. Embracing culture, whilst achieving all of these things, should act to increase vitality within the borough which will increase the prospect of investment and associated regeneration. This policy will be of particular benefit to minority groups, providing an outlet for them to express themselves, strengthening their identity and position within the local community.

The policy will have neutral impacts on traffic, health, homes that meet needs, community safety, accessibility, traffic, waste, bio-diversity and open spaces, water, soil, greenhouse gas emissions, climate change, flood risk, education and skills and

infrastructure. Although it may impact on some of these elements, where there are impacts these will either be negligible positives or negatives.

The policy supports creative industry, and this is likely to have a beneficial impact on the following groups: race (as a specific cultural identity will be able to be expressed), religion and belief (as a cultural identify, more often than not tied into race, will be able to be expressed) and sexual orientation (as the arts have historically and still provide in the majority of situations an environment for freedom of expression and greater acceptance of minorities). For the other protected characteristics, there might be small benefits but these are not considered to be any greater than for the population as a whole. **With regards to disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment the policy will have a neutral impact on these groups.**

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	0	-	0	-	-	0	0	0	0	0	-	-	0	0	0	0	0	0	-	-	0	0

The policy will have negative impacts in relation to social inclusion, quality of surroundings, community identity, townscapes, cultural assets, regeneration, and investment. In order for the creative enterprise zone to flourish it needs council backing and encouragement. Without a specific policy this area would not see the required development to see this happen, impacting negatively upon social cohesion, reducing the sharing of values between residents, disproportionately impacting those from minority ethnic groups by impeding their ability to express themselves creatively and partake in local activities directly, in a visible way. This policy would not help enhance the quality of the surroundings and cultural assets through regeneration and investment, leading to a poor townscape and sense of place.

This policy will have neutral impacts on well-being, housing, crime, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, education, and efficient infrastructure.

Not having a policy may negatively impact the following groups: race (as a specific cultural identity will be able to be expressed), religion and belief (as a cultural identify, more often than not tied into race, will be able to be expressed) and sexual orientation (as the arts have historically and still provide in the majority of situations an environment for freedom of expression and greater acceptance of minorities). For the other elements of protected characteristics, there will be no difference compared to the preferred policy, and therefore the policy would have a neutral impact.

Alternative Policy: To provide a more detailed policy that sets out specific criteria against which applications will be assessed																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	0	-	0	-	-	0	0	0	0	0	-	-	0	0	0	0	0	0	-	-	0	0
<p>This will only incur negative impacts in the form of social inclusion, quality of surroundings, community identity, townscapes, cultural assets, regeneration, and investment. It would not be possible to effectively standardise the planning process for cultural assets as they represent a very dynamic asset which covers a wide range of areas. In doing so this policy may reduce the creative potential which may reveal itself, reducing social cohesion, quality of surroundings, community identity, towns capes, regeneration and associated investment.</p> <p>This policy will have neutral impacts on well-being, housing, crime, traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, education, and efficient infrastructure.</p> <p>The policy is considered to have a beneficial impact on the following groups: race (as a specific cultural identity will be able to be expressed), religion and belief (as a cultural identify, more often than not tied into race, will be able to be expressed) and sexual orientation (as the arts have historically and still provide in the majority of situations an environment for freedom of expression and greater acceptance of minorities). For the other of protected characteristics, there might be small benefits but these are not considered to be any greater than for the population as a whole. With regards to disability, age, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment the policy will have a neutral impact on these groups.</p> <p>Overall, it is considered that there would be little difference between the preferred policy and this policy in terms of impact.</p>																								
<p>Conclusion: The proposed policy is seen to have the greatest potential for positive impacts. It is important for there to be a policy specific to the implementation of the creative hub at Willesden in order to prove the seriousness of the council's intent and to provide guidance and coordination for developers to collaborate on this endeavour. In this case it would not be appropriate for there to be no policy. If the policy were to become more detailed it would reduce the flexibility of the project, as being of a creative nature, the policy needs to be dynamic in order to react to the creative flow.</p>																								

Policy: BHC4 BRENT'S NIGHT TIME ECONOMY																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	0	+	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	+	+	0	0
<p>The policy will have minor positive impacts in relation to social inclusion, quality of surroundings, population diversity/ culture, town centres and to quality of surroundings, cultural assets, growth and regeneration and investment and employment. The policy seeks to encourage the maintenance and enhancement of the borough's recognised night-time economy venues. As the economy is often associated with creative/ cultural outputs it will increase opportunities for social inclusion by highlighting and making different cultural events available and accessible to more, bettering communications between those from different social groups. The initiative will create a sense of place by differentiating these areas from other parts of the borough/ London, some of which will support or create new cultural assets. The night time economy is an important contributor to the overall economy providing a variety of employment opportunities for artists who may not be accommodated in mainstream employment and others associated with hospitality/ venues. The night time economy is an important part of facilitating inward investment in the borough.</p> <p>The policy will have neutral impacts on traffic, health, homes that meet needs, community safety, accessibility, traffic, waste, bio-diversity and open spaces, water, soil, townscape, greenhouse gas emissions, climate change, flood risk, education and skills and infrastructure. The night time economy does have some mixed outcomes around some elements such as crime, waste, noise and community cohesion. Although historically the implications of some of these elements may have been negative, usually related to the consumption of alcohol, it is considered that with appropriate design/ conditions on developments, plus inter-agency working that the negative elements can be mitigated to such an extent that they are considered neutral in their impacts.</p> <p>On age, race and sexual orientation the policy is considered to have positive impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have a neutral impact on those with a protected characteristic. The policy supports the night time economy. This is of greater importance for some groups, i.e. the young, ethnic groups and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, the night time economy, particularly if predicated on alcohol consumption can be intimidating/ threatening in the physical sense or beliefs. However, this policy does not support one particular type of night time economy activity over another and therefore the impact on these groups is neutral.</p>																								

Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	0	0	-	-	-	-	0	0	0	0	0	0	-	0	0	0	0	0	0	-	-	0	0
<p>The policy will have negative impacts in relation to social inclusion, quality of surroundings, crime, population diversity/ culture, town centres and to quality of surroundings, cultural assets, growth and regeneration, investment, and employment. It is important for the council to encourage the enhancement of the night time economy as it is often something which is overlooked by developers, with many night time venues such as pubs and clubs closing down or being converted into other uses such as residential. The night time economy is a large source of employment within the borough, delivering a specific need often to those whom cannot work during the day or cannot work full time hours, helping to improve equality for those with specific protected characteristics. The night time economy is often associated with cultural activities and therefore helps with social inclusion and creating a sense of place within the borough. Although often associated with crime, the night time economy helps get people out on the streets later at night, helping create a source of passive surveillance which would otherwise be absent. It is also important in creating a sense of place and vibrancy, helping to improve town centre viability and associated investment and regeneration.</p> <p>This policy will have neutral impacts on well-being, housing, traffic, waste, resources, environmental health, biodiversity, landscape and townscape, climate change mitigation and adaption, land and soil, open spaces, flood risk, regeneration, education, and efficient infrastructure.</p> <p>On age, race and sexual orientation, a lack of is considered to have negative impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief a lack of policy will have a neutral impact. Not having a policy could undermine some elements of the night time economy. This might be to the detriment of some groups, i.e. the young, ethnic groups and sexual orientation and possibly gender reassignment meeting in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, the night time economy, particularly if predicated on alcohol consumption can be intimidating/ threatening in the physical sense or beliefs. The loss of premises may be neutral in this respect.</p>																								

Alternative Policy: To identify a wider range of centres to prioritise for the night time economy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	-	-	-	-	-	-	0	0	-	0	-	0	0	0	0	0	0	-	-	-	0	-
<p>The anticipated negative impacts are associated with social inclusion, health and well-being, housing, quality of surroundings, crime, accessibility, community identity, traffic, environmental health, townscape, regeneration, employment, investment, and efficient infrastructure. The negative impacts listed here are primarily a result of the increased fragmentation of previously concerted efforts, undermining the critical mass of infrastructure which has been sort from the areas addressed by the London plan. This will act to separate neighbourhoods, reducing their likely integration, reducing individual centres capacity to meet the diverse needs or its residents, increasing dependency on personal vehicles and decreasing physical activity and increasing air pollution. The policy may lead to a reduction in overall investment, impinging upon regeneration, affecting the aesthetics of the townscape, its sense of place and ability to attract local businesses, reducing town centre viability and employment opportunities. The scattered infrastructure will also serve to reduce the efficiency of freight distribution. A dispersed nature may also undermine effective policing/ enforcement of law and order where police resources are more limited, increasing the propensity for disorder or harm from physical assault.</p> <p>This policy will have neutral impacts on waste, resources, biodiversity, heritage, climate change mitigation and adaption, land and soil, open spaces, flood risk, and education.</p> <p>On age, race and sexual orientation the policy is considered to have positive impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have a neutral impact on those with a protected characteristic. The policy supports the night time economy in a wider range of locations. This is of greater importance for some groups, i.e. the young, ethnic groups and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, the night time economy, particularly if predicated on alcohol consumption can be intimidating/ threatening in the physical sense or beliefs. Criminal incidents related to property damage, anti-social behaviour and physical violence are more likely to occur in town centres where alcohol is prevalent. A significant element of protecting safety is having sufficient police/ security presence to oversee the night time economy. Significant increases in premises, particularly over a wider range of areas unless matched by significant additional police/ security resource could lead to a reduction in safety of those groups with protected characteristics which have been identified as having both positive and negative impacts.</p>																								

Conclusion: The proposed policy is seen as the most appropriate for Brent, potentially having numerous positive impacts. It is important for the council to support the development of the night time economy and in doing so will help Brent achieve a number of key objectives. Therefore, it would not be seen as appropriate to have no policy. In order for Brent to maximise the associated benefits of the night time economy it is important to concentrate efforts into designated night time economy centres in order to increase long term viability, therefore it would not be appropriate to identify additional areas for this purpose.

Policy: BHC5 PUBLIC HOUSES

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	0	+	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	+	0	0	0	0

The policy will have minor positive impacts in relation to social inclusion, quality of surroundings, population diversity/ culture, town centres and to quality of surroundings, cultural assets, growth and regeneration and investment and employment. The policy seeks to encourage the maintenance and enhancement of the borough’s public houses recognising the cultural benefits that they have as places that historically have been at the heart of communities and allow for dialogue/ interaction and also cultural events. Pubs create a sense of place by differentiating these areas from other parts of the borough/ London. The night time economy is an important contributor to the overall economy providing a variety of employment opportunities for artists who may not be accommodated in mainstream employment and others associated with hospitality/ venues.

The policy will have neutral impacts on traffic, health, homes that meet needs, community safety, accessibility, traffic, waste, bio-diversity and open spaces, water, soil, townscape, greenhouse gas emissions, climate change, flood risk, education and skills and infrastructure. Public houses do have some mixed outcomes around some elements such as crime, waste, noise and community cohesion. Although historically the implications of some of these elements may have been negative, usually related to the consumption of alcohol, it is considered that with appropriate design/ conditions on developments, plus inter-agency working that the negative elements can be mitigated to such an extent that they are considered neutral in their impacts.

On age, race and sexual orientation the policy is considered to have positive impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have a neutral impact on those with a protected characteristic. The policy supports the retention of public houses. This is of greater importance for some groups, i.e. the young or old, ethnic groups (but predominantly white British) and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, public houses are not

part of their lifestyle and can be regarded as intimidating/ threatening in the physical sense or to their beliefs. However, the policy will not result in the creation of any new public houses, and the policy is therefore considered to have a neutral impact on these groups.

Alternative Policy: No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	0	-	-	-	-	-	0	0	0	0	-	-	0	0	0	0	0	-	-	-	0	-

This policy will negatively impact social cohesion, well-being, and quality of surroundings, crime, community identity, accessibility, traffic, townscape, heritage, regeneration, employment, investment, and efficient infrastructure. This policy is likely to lead to the reduction in pubs, and their replacement with alternative investments, which the council has not advised is appropriate. This removal of social infrastructure will negatively affect social cohesion and resident satisfaction due to a reduced sense of place and community identity along with a decrease in accessibility to key services. Pubs represent valued cultural and historic assets and their removal will decrease the attractiveness of an area, the policy will lead to a reduction on local investment, reducing long term employment opportunities and increasing the need to commute.

This policy will have neutral impacts on housing, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, and education.

On age, race and sexual orientation, not having a policy is considered to have negative impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have a neutral impact on those with a protected characteristic. A lack of policy is likely to exacerbate the trend in loss of public houses. This would more adversely impact on some groups, i.e. the young or old, ethnic groups (but predominantly white British) and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, public houses are not part of their lifestyle and can be regarded as intimidating/ threatening in the physical sense or to their beliefs, so the loss of public houses is likely not to be as negative.

Alternative Policy: To provide more criteria for assessment

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	0	-	-	-	-	0	0	0	0	0	-	-	0	0	0	0	0	-	-	-	0	-

This policy will negatively impact social cohesion, well-being, quality of surroundings, crime, community identity, accessibility, traffic, townscape, heritage, regeneration, employment, investment, and efficient infrastructure. Public houses are important and valued community assets. It is therefore important that they remain viable investments for those interested, and continue to entice investment in the years to come. The current set of assessment criteria outlined in this policy have been in place for two years and have proved successful in maintaining the industries viability. If the criteria were too strict it would provide additional risk to investors who may fear they cannot back out once they're invested. It is therefore important to maintain a level of flexibility within the system to enable this, having them converted into alternate uses provide they sufficiently meet assessment requirements. Therefore, the addition of extra criteria may reduce public house viability leading to its reduced presence in town centres, negating the intention of the policy and serving to decrease a number of council objectives such as social inclusion, well-being, community safety and identity. The policy will also serve to reduce employment opportunities within the area.

This policy will have neutral impacts upon housing, Traffic, waste, resources, environmental health, biodiversity, climate change mitigation and adaption, land and soil, open spaces, flood risk, and education.

This is not considered to have fundamentally different impacts to the preferred policy, as it is unlikely to significantly change the potential for pubs to be retained. On age, race and sexual orientation the policy is considered to have positive impacts. On disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment, and religion and belief the policy will have a neutral impact on those with a protected characteristic. The policy supports the retention of public houses. This is of greater importance for some groups, i.e. the young or old, ethnic groups (but predominantly white British) and sexual orientation in environments that provide a safe place to meet with similar people/ ability for cultural expression. For some faith and ethnic groups, public houses are not part of their lifestyle and can be regarded as intimidating/ threatening in the physical sense or to their beliefs. However, the policy will not result in the creation of any new public houses will therefore have a neutral impact on these groups.

Conclusion: The proposed policy is seen as the most appropriate for Brent, bringing with it numerous positive impacts. The proposed policy has been demonstrated to be successful at both mitigating against of loss of public houses, but also the continued investment in them, retaining them as a viable investment both socially and economically.

Green Infrastructure

Preferred Policy: BGI1 GREEN AND BLUE INFRASTRUCTURE IN BRENT																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+/-	+	?	+	?	+	?	++	+	++	+	+	+	+	+	++	+	+	?	?	n/a	+/-
<p>The policy will have positive impacts in relation to: promoting social inclusion; health and well-being; providing a high quality and healthy environment; encouraging a shared sense of community and cultural identity; promoting sustainable modes of travel; minimising air, noise and light pollution; conserve and enhance the borough's natural habitats and biodiversity; protecting and enhancing the borough's historic and cultural assets; climate change; land and soil; green and open space; flood risk; and economic growth. The creation of additional green and blue infrastructure within Brent will have a number of positive impacts on the borough's residents and environments. These benefits include: improving mental and physical well-being, such as reducing stress and depression, for all residents; reducing health inequalities within the borough; providing spaces for exercise and active recreation; provide places for all communities to congregate and socialise; improve living conditions within the borough; enhancing the accessibility to the borough's green infrastructure; providing residents and visitors the opportunity to interact with nature; filtering noise and improving air quality; and, reducing flood risk within the borough through absorbing water and capturing run-off. The protection and enhancement of the borough's existing green infrastructure will also be beneficial for the biodiversity and land and soil through the safeguarding of established habitats and areas of geological significance from development pressures. The creation of green spaces can be used as a tool to help the borough's urban landscape and population adapt and mitigate against the impacts of climate change. For example, additional green space can to tackle the impacts of urban heat island effect through lowering temperatures by utilising the cooling benefits that green spaces can bring. Furthermore, green spaces can assist in capturing CO₂ and other pollutants. Green infrastructure can help to promote economic growth through creating a healthy environment for workers, creating jobs and support attracting investment. It is considered that this policy will have a positive impact on the following protected characteristic: 'age'. This policy will have a positive impact on the elderly population of the borough through reducing their vulnerability on the impacts of urban heat island and air pollution, and assisting in reducing social isolation through providing areas where social interaction can take place. Furthermore, providing areas for children to play can support a child's social, emotional, intellectual and physical development. Evidence is also emerging which highlights the impacts that exposure to air pollution can have on pregnant women and their unborn child. Improving air quality within the borough can reduce such risks.</p> <p>Impacts will be unknown in relation to re-use and recycling, improving community safety and preventing crime, accessibility, employment, facilitating indigenous and inward investment, education and skills and efficient infrastructure. The impact the</p>																								

borough's green infrastructure has on waste and recycling rates is dependent on the management plan and infrastructure/facilities that are in place, for example whether opportunities for composting is provided or a rain garden included. Improving connectivity to the boroughs green infrastructure, through implementing a green grid network, may indirectly result in improvements in connectivity to the borough's employment areas. Incorporating green infrastructure within town centres can support its vitality and viability through creating a pleasant shopping environment, and encouraging an increase in 'dwell time'. It is possible that green infrastructure within town centres can support its vitality and viability through the creation of an aesthetically pleasing environment, and providing space for visitors/residents. However, this policy does not specifically address the greening of town centres, instead focusing on improving green infrastructure at a borough-wide scale. It is possible that greening the town centres could occur through development coming forward within the town centre boundary. Green Infrastructure can support the provision of jobs, however the amount of jobs provided is dependent on the amount and type of green infrastructure that is in place within the borough.

The policy will have mixed benefits in relation to housing and creating efficient infrastructure. The continued protection, and the requirement for on-site open space provision will reduce the area of land available for development, or have an impact on the density that can be achieved on a site. However, the provision of on-site open space and improved access to open space will contribute to creating a higher quality living environment, which has improved liveability. The protection of the borough's green infrastructure, in particular that of Brent's waterways, will provide the opportunity to use these assets to distribute freight. However, increased usage of the borough's waterways for freight movement can result in an increase in water pollution, if appropriate mitigation measures are not put in place.

The policy will have no effect on improving educations and skills.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The policy will have positive impact on the protected characteristics of age and pregnancy and maternity as poor air quality can be particularly detrimental to the health of these groups.

The policy seeks protect and enhance the borough's natural environment, and where appropriate, seek improvements to its accessibility, which will benefit all residents within the borough.

ALTERNATIVE POLICY: Rely on London Plan policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	?	+/-	n/a	+	?	+	n/a	+	+	+	+/-	+	+	+	+	+	+	+	n/a	n/a	n/a	+/-
<p>This policy will have positive impacts on prosperity, inequalities and social inclusion; health and well-being; community identity; traffic; water quality and resources; environmental health; historic environments and cultural assets; biodiversity; landscape and townscape; climate change mitigation; climate change adaption; land and soil; open space; flood risk; and growth and regeneration. London Plan policy will have a number of positive impacts on the borough's residents, visitors and environments. These include health and well-being benefits, such as reduced stress and improved physical activity levels; providing areas for communities to congregate and socialise; encourage active travel through providing pleasant and safe walking environments; protecting spaces within the borough which offer a social and cultural function; improving water quality in line with the Thames River Basin Management Plan and Catchment Plans; contribute to improving air quality and reducing the impacts of noise and light pollution; providing habitats for the borough's biodiversity.</p> <p>This policy will have mixed effects on housing; quality of surroundings; townscape and landscape; and efficient infrastructure. London Plan policy requires development plans to protect open space, and where possible, create new publicly accessible open space provision on development sites. This approach will reduce the area of developable land available within the borough, and can also have an impact on the density that can be achieved on development sites. However, the continued protection of open space and on-site provision can contribute to creating a higher quality living environment and improves the liveability of an area. As mentioned previously, the London Plan seeks to protect open spaces. The retention of open spaces within the borough will have an impact on the quality of surroundings, however it is the quality of the open spaces which will determine whether it is has a positive or negative impact. Enhancements and quality of open spaces is not specifically addressed within London Policy, with the exception of Metropolitan Open Land, Metropolitan Parks and Regional Parks. As the current quality of open spaces within the borough vary, therefore only protecting open spaces, as per London Policy, will have a mixed effect on quality of surroundings. A similar case can also be applied to townscape and landscape.</p> <p>The policy will have no effect on crime prevention and community safety; waste and recycling; historic environments and cultural assets; employment; education and skills.</p> <p>This policy will have a neutral impact on people with the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.</p>																								

London Plan policy seeks to protect designated green spaces from inappropriate development, and seeks improvement to accessing nature. These policies will benefit all residents within the borough.

ALTERNATIVE POLICY: Developing on poorer quality spaces to fund improvements to other green spaces

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+/-	+/-	+	+/-	n/a	+/-	?	+/-	n/a	?	+/-	+/-	++	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	n/a	n/a

This policy will have positive impact on housing; landscape and townspace; growth and regeneration; and investment. The development of poorer quality open spaces to fund improvements to the borough’s other green spaces will have limited positive impacts. This policy approach will enable development on poor quality open spaces, which could include housing, to fund improvements to other open spaces within the borough. The loss of poorer quality landscape, and enhancements to other green spaces will contribute to creating an attractive environment, which in turn can lead to promote/trigger the regeneration of an area and attract investment within the borough. The development on poorer quality open spaces will create construction jobs on a short-term basis within the borough; however, it should be noted that the amount of construction jobs created is dependent on Employment, Apprenticeship and Training Plans being secured.

This policy will have mixed benefits on prosperity, inequalities and social inclusion; health and wellbeing; quality of surroundings; environmental health; historic environments and cultural assets; biodiversity; climate change mitigation; climate change adaptation; land and soil; open space; flood risk. Improvements to the quality of open space within the borough will bring a number of social benefits, such as providing a good quality environment for residents to congregate and socialise, health and well-being benefits, and areas for physical activity and recreation. However, these benefits will not be felt for residents who are located close to open spaces which will be developed on to support enhancements elsewhere. While enhancements to green spaces can contribute to the uptake of active travel within the borough, the loss of open space can have an impact on accessibility. The enhancement of open and green space can improve a spaces ability to contribute to negating the impacts air quality, noise and light pollution; however, the loss of open space within an area could lead to the impacts of air quality, noise and light pollution worsening. Enhancements to green space within the borough will be beneficial for wildlife, in particular if actions from the wildlife sites review is incorporated; however, the loss of open space will also mean the loss of a habitat. Open spaces help the borough to mitigate and adapt to the impacts of climate change, for example reducing flood risk within the urban areas and contributing to lowering the temperate; however, it is possible areas in which open space will see an increase in vulnerability to the impacts of climate change. In regards to open space, while the enhancement of open space will have a number of positive impacts, some of which have been previously

discussed, this will be mixed with the negative impacts associated with the loss of open space. Open spaces can be seen as cultural assets due to their ability to fulfil a range of social and cultural needs.

The policy will have unknown effects on accessibility and employment. As mentioned previously, green infrastructure within, or in close proximity, to a town centre can help to maintain and improve its vitality and viability through creating a pleasant shopping environment and encouraging ‘dwell time’. However, the impact that this policy will have is dependent on the decision made (improvement or loss) for green and open spaces within or close to town centre boundaries.

The policy will have no effect on crime prevention and community safety; employment; education and skills; and efficient infrastructure.

This policy will have a neutral impact on people with the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. London Plan policy seeks to protect designated green spaces from inappropriate development, and seeks improvement to accessing nature. These policies will benefit all residents within the borough.

ALTERNATIVE POLICY: Providing no additional open space within the Council’s Growth Areas and on major development sites

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	?	+	-	n/a	0	n/a	-	n/a	?	0	-	?	0	-	-	n/a	-	-	?	n/a	+/-	n/a	n/a

This policy will have positive impacts on housing. Through not requiring additional open space within the borough’s Growth Areas more space will be available to accommodate additional housing and/or employment space.

This policy will have minor negative impacts on quality of surroundings; biodiversity; climate change adaption; climate change mitigation; open space; flood risk. Significant growth is anticipated to take place within the borough’s Growth Areas. There are also a number of major developments that are anticipated to come forward outside of the boundaries of the borough’s Growth Areas. It is likely that this growth will place additional pressure on the borough’s resources, including existing green infrastructure. Not providing additional green and open space can result in a number of negative impacts for the borough’s residents and environments, such as: restricting access to the health and well-being benefits of open space; limiting opportunities to create healthy environments for the borough’s residents to live in , work in and enjoy; preventing improvements to accessibility to the borough’s open space, particularly within the

densely developed south which has existing areas of open space deficiency ; not promoting the uptake of active modes of travel by minimising opportunities to create attractive walking and cycling environments; and providing no additional habitats within the borough, which not only limits accessibility to nature for residents, but can impact on the movement of wildlife from other areas of the borough. Increased pressure on existing open spaces as a result of the growth in population could lead to a decrease in quality. Not providing green spaces within the borough's Growth Areas and on major developments could increase their vulnerability to the impacts of climate change, in particular flooding and the urban heat island effect. Green and open spaces can act as sustainable drainage systems through capturing run-off. The capturing of surface water run-off, which can contain contaminants such as oil and organic matter, can help towards improving water quality within the borough. This benefit will not be realised within Growth Areas and major developments, some of which adjoin the borough's blue ribbon network. It is considered that this policy may have negative impacts on the following the following protected characteristics: 'age' and 'pregnancy or maternity'. It should be noted that such impacts are likely to be limited to the population within the identified Growth Areas. Through not providing additional green space within the identified Growth Area, the vulnerability of the elderly and young population to the impacts of climate change and poor air quality could be slightly increased.

This policy will have no effect on community identity; environmental health; historic environment and cultural assets and growth and regeneration. It is widely known that green and open space can contribute to improving air quality and filtering noise within an area. However, the London Plan policy requires all major developments to be designed to minimise the impact of noise and be at least air quality neutral; therefore, it is possible that through the implementation of London Plan policies environmental health benefits will still be realised within Growth Areas and on major developments.

This policy will have uncertain effects health and well-being; landscape and townscape; water quality and resources; and growth and regeneration. Green and open space can help to create an attractive townscape and landscape; however it is the design of the building, and its interaction with the existing environment, which will be the predominant factor in determining whether the development will have a positive or negative impact on the landscape/townscape

This policy will have positive and negative impacts on investment. The borough's Growth Areas have a number of characteristics, such as good links to the strategic road network and high PTAL levels, that make them a suitable to accommodate significant growth. Such characteristics can also contribute towards them being attractive to investment; therefore, not requiring additional open space to be provided within the Growth Areas can enable more high quality employment space, or housing to accommodate employees, to be provided. Both of these can contribute towards attracting investment to the borough. However, creating high quality open spaces within these areas can help to attract and retain industries through creating an environment where people want to live and work.

This policy is not applicable to crime prevention and community safety; accessibility; waste management; land and soil; employment; education and skills; and efficient infrastructure.

It is considered that this policy will have a neutral impact on people with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. All residents within the Growth Area will not be able to take advantage of the benefits that green and open spaces can bring. However, the policy could have particularly negative impacts on the protected characteristics of age and pregnancy or maternity, as through not providing additional green space within the identified Growth Area, the vulnerability of the elderly, young and pregnant population to the impacts of climate change and poor air quality could be slightly increased. In addition, these groups may find it more difficult to visit existing open spaces due to their more limited mobility.

Conclusion: The preferred policy approach, which seeks to establish a Green Infrastructure Network within the borough, will result in a higher level of positive social, environmental and economic impacts. The IIA indicates that this approach will result in mixed benefits for two indicators.

Developing on poorer quality open spaces to fund improvements to other green spaces is not considered to be appropriate as it will result in loss of some of the borough’s green space, which will be needed to support the growing population. Furthermore, the Council can explore opportunities for improving these open spaces, ensuring the social, environmental and economic benefits are maximised. Not requiring the Growth Areas and major development sites to provide additional publically accessible open space will place further pressure on the borough’s existing green infrastructure, and will result in a number of negative impacts on environmental matters, such as biodiversity, climate change adaptation and environmental health.

Preferred Policy: BGI2 TREES AND WOODLANDS

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+/-	+	n/a	?	n/a	?	n/a	+	+	+	+	n/a	+	+	+	+	+	?	n/a	n/a	n/a	n/a

The policy will have a positive impact on prosperity, inequalities and social inclusion; health and well-being; quality of surroundings; environmental health; biodiversity; landscape and townscape; climate change mitigation an adaption; land and soil; open space and flood risk. The protection and retention of trees and woodlands, as well as increasing the tree coverage will have

a number of positive impacts on the borough's residents and environment, which include: providing areas for communities to meet; supporting the development of groups with a conservation interest; contribute to improving the quality of the local environment, which in turn could lead to some improvement within an areas level of deprivation; contribute to improved health and well-being of residents through, but not limited to reducing stress, encouraging physical activity and improving air quality; contribute to creating a healthy environment within the borough; helping to improve environmental quality within the borough through providing mitigation against noise and light pollution and helping to improve local air quality; supporting biodiversity through the provision of habitats; enhancing the quality of the public realm and townscape; supporting climate change mitigation and adaption through reducing flood risk; contributing to the character of the borough; green and open spaces. As mentioned previously, it is widely document that the young and elderly have increased vulnerability to the impacts of climate change and poor air quality. Evidence is also emerging which highlights the impacts that exposure to air pollution can have on pregnant women and their unborn child. Improving air quality within the borough can reduce such risks. Therefore, the mitigation and/or protection that trees can offer against climate change and air quality can lead to a reduction in vulnerability for residents with these protected characteristics.

The policy will have an uncertain impact on community identity; traffic and growth and regeneration. Trees and woodlands can encourage community development and the creation of a community identity. However, trees in which help shape a community is dependent on a number of factors, which includes quality, sentimental value and amenity value. In regards to traffic, tree planting can contribute to creating an attractive walking and cycling environment which could facilitate an increase in the uptake of active travel. However, as it is not possible to confirm that improvements to the walking environment through the planting of trees will increase the uptake of active ravel, the effects of this policy on this objective is uncertain. In regards to growth and regeneration, the inclusion of green infrastructure within town centres and employment areas can have a number of benefits, which include contribute to improving employee's productivity, and attracting businesses and visitors. However, the impact that the planting of trees will have is dependent on the scheme that comes forward, and whether trees are included within the scheme.

The policy will have mixed impacts on housing. The protection of woodland and trees within the borough could have a negative impact on housing development within the borough, in particular the development capacity of the site. However, protecting, and where possible increasing tree cover could help a new development to be viewed as attractive.

The policy will have no effect on crime prevention and community safety; accessibility; traffic; waste management; water quality and resources; employment; investment; education and skills; efficient infrastructure.

It is expected that maintaining and enhancing the borough's tree stock will have a neutral impact on the following protected characteristics: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual

orientation. However, the policy will have positive impact on the protected characteristic of age and pregnancy and maternity
 The benefits associated with trees and hedgerows will be available for all residents, therefore will not have any adverse impact on people with protected characteristics.

ALTERNATIVE POLICY APPROACH – No protection for the borough’s trees and woodlands

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	-	-	+	-	n/a	-	n/a	-	n/a	?	-	-	-	0	-	-	0	0	-	n/a	n/a	n/a	n/a	n/a

This policy approach will have a positive impact on housing. Not protecting the borough’s woodlands and trees will mean that they can be removed to maximise the density at a development site.

This policy approach will have a negative impact on prosperity, inequalities and social inclusion; health and well-being; quality of surroundings; environmental health; biodiversity; landscape and townscape; climate change mitigation; climate change adaption; and flood risk. Without protecting the borough’s trees, particularly those on development sites, there is a higher probability that they will be removed and not replaced. Trees and woodlands can encourage community cohesion, for example through the creation of groups who have an environmental or biodiversity interest. Therefore, not protecting trees, which could lead to their removal as part of a development scheme, may reduce the opportunities for these groups to form. Trees and woodlands provide a number of health and well-being benefits, such as improving air quality and mental well-being, which can be lost if removed to accommodate development. Trees provide a number of environmental benefits, such as acting as a sound barrier, improving air quality and reducing temperatures, all of which will be reduced/disappear if trees re removed. Trees provide a visual break within the built environment, provide residential amenity and help to establish a sense of place, all of which will be lost if the borough’s trees are removed, due to them not being protected. Furthermore, trees can play an important role in assisting the borough in adapting and mitigating the impacts of climate change, for example, reducing flood risk through water retention and mitigating the impacts of urban heat island effect through reducing temperatures. If trees from a development site are removed, and not replaced, the sites resilience to the impacts of climate change could be affected.

This policy approach will have an unknown impact on water quality and resources. Trees can help to reduce flood risk within an area. The removal of trees, due to not being protected, could increase a vulnerability to flood risk and sewer overflow events. However,

the impact that flooding will have on an area is a combination of a number of factors, for example the capacity of the sewer infrastructure and presence of SuDS.

This policy approach cannot be applied to crime prevention and community safety; accessibility; waste management; growth and regeneration; employment; investment; education and skills; efficient infrastructure.

It is considered that this policy will have a neutral impact on people with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. All residents within areas developed will not be able to take advantage of the benefits that retention of trees and woodland can bring.

Conclusion: The preferred policy approach results in a higher level of positive social, environmental and economic impacts. Protecting the borough's trees and woodlands will contribute to reducing poor air quality, help the borough to mitigate and adapt to the impacts of climate change and contribute towards maintaining and enhancing the borough's biodiversity. The IIA indicates that this approach results in a higher amount of positive impacts in comparison to not protecting the borough's trees and woodlands.

Sustainable Infrastructure

Preferred Policy: BSUI1 Creating a Resilient and Efficient Brent																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+	n/a	+	n/a	n/a	?	n/a	n/a	+	+	n/a	n/a	n/a	++	++	n/a	n/a	+	+	n/a	n/a	n/a
<p>This policy will have positive impacts on prosperity, inequalities and social inclusion; health and wellbeing; quality of surroundings; water quality and resources; environmental health; climate change mitigation; climate change adaption; and growth and regeneration, efficient infrastructure. The policy, which seeks to reduce carbon emissions and help to improve Brent's resilience against the impacts of a changing climate, can have a number of positive impacts on the borough's environment, which include: increasing the energy efficiency of buildings which would help to reduce fuel cost and the risk of fuel poverty, reduced greenhouse gas emissions through the usage of more efficient systems, and ensuring that buildings are able to mitigate and adapt to climate change over their intended lifetime, reducing long term costs. Improving the efficiency of the commercial buildings can also encourage growth and regeneration.</p> <p>This policy will have uncertain effects on accessibility and the historic environment and cultural assets. This policy is not applicable to housing; crime prevention and community safety; community identity; historic environments and cultural assets; traffic; waste management; biodiversity; landscape and townscape; land and soil; open space; employment; investment; and, education and skills.</p> <p>It is considered that this policy will have a neutral impact on people with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. All residents in new developments within the specified areas will benefit from the provision of combined heat and power systems. Additionally, all residents within new developments will benefit from improved sustainable design. However, it is not clear that this will disproportionately impact any one protected characteristic over another. The policy could have a particularly positive impact on the protected characteristic of age, as the very old and very young can be more vulnerable to hotter temperatures. As such, ensuring that buildings are resilient to the impacts of climate change may particularly benefit these sub-groups.</p>																								
ALTERNATIVE POLICY: Rely on draft London Plan policies (SI2, SI3, SI4)																								

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	n/a	n/a	?	n/a	n/a	+	+	+	n/a	?	++	++	n/a	+	+	+	n/a	n/a	n/a	+
<p>This policy will have positive impacts on prosperity, inequalities and social inclusion; health and wellbeing; quality of surroundings; water quality and resources; environmental health; climate change mitigation; climate change adaption; open space; flood risk. The London Plan policies, which seeks to minimise greenhouse gas emissions, manage heat risk, improve energy and water efficiency, and encourage the use of sustainable energy infrastructure, will have a number of benefits on the borough's residents and environments, which include: reducing the cost of fuel and the risk of fuel poverty; improved health and wellbeing for residents linked to the presence of green infrastructure and improved air quality; improving the liveability of an area; creating an attractive townscape and landscape through incorporating green infrastructure into development schemes; providing habitats and green spaces; and improving local air quality. The requirement for developments to minimise greenhouse gas emissions and manage heat risk will help the borough's urban environment to mitigate and adapt to the changing climate. Improving the energy efficiency of commercial buildings within the borough can encourage growth and regeneration.</p> <p>This policy will have uncertain impacts on the historic environment and cultural assets and open space. Retrofitting the borough's older buildings, some of which have been afforded protection due to their special character, to ensure efficiency standards set out in the London Plan could have an impact on the historical value of these buildings. However, this is dependent on the scheme that comes forward, as it is possible to incorporate measures which will achieve the required measures sensitively.</p> <p>This policy is not applicable to housing; crime prevention and community safety; community identity; accessibility; traffic; waste management; land and soil; employment; investment; education and skills.</p> <p>It is considered that this policy will have a neutral impact on people with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. The policy could have a particularly positive impact on the protected characteristic of age, as the very old and very young can be more vulnerable to hotter temperatures. As such, ensuring that buildings are resilient to the impacts of climate change may particularly benefit these sub-groups.</p> <p>Conclusion: The preferred policy option adopts a more local approach to tackling sustainability issues with Brent. The standards set in the policy build upon those set out within the draft London Plan.</p>																								

Preferred Policy BSUI2 – Improving Air Quality																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+	n/a	+	n/a	n/a	?	+	n/a	+	+	+	+	n/a	+	+	n/a	?	?	+	n/a	n/a	n/a
<p>This policy will have positive impacts on prosperity, inequalities and social inclusion; health and wellbeing; quality of surroundings; water quality and resources; environmental health; biodiversity; landscape and townscape; climate change adaption; climate change mitigation. Improving local air quality will have a number of positive impacts on the borough’s residents and environment, which include: improved liveability in the borough’s urban environments; improvements to the health of the borough’s population, in particular the young, elderly and those with respiratory, which can result in less pressure on the borough’s health services; reducing health inequalities within the borough; support the creation of a healthy living environment for the borough’s residents and workers; reduce the impacts that poor air quality has on the borough’s ecosystem, such as the ability to grow and function; and, reduce the impacts that poor air quality has on the quality of the borough’s water resources. Improving local air quality will assist in alleviating the impact of climate change, such as the urban heat island. It is considered that this policy will have positive impacts on the following protected characteristics: ‘age’ and ‘pregnancy and maternity’. It is widely documented that the elderly and young have higher vulnerability to the impacts of poor air quality, due to adverse effects that it can have on their health. Therefore, improvements to the air quality within the borough is likely to see positive impacts on these age categories. Evidence is emerging which highlights the impacts that exposure to air pollution can have on pregnant women and their unborn child. Improving air quality within the borough can reduce such risks.</p> <p>Furthermore, poor air quality is not evenly distributed across the borough, with some areas more likely to be affected by poor air quality than others due to wider problems of poverty. Therefore, improvements to the air quality within the borough can result in improvements in the health and well-being, and living conditions of residents within these areas.</p> <p>This policy will have unknown effects on accessibility; open space and flood risk. Creating high quality public realm can assist in supporting the vitality of a town centre through creating a pleasant shopping environment. However, whether this approach has a positive impact on town centres is dependent on whether development comes forward within, or in close proximity to a town centre. There are a number of schemes which can come forward to tackle air quality. The Council’s Air Quality Strategy encourages the use of green infrastructure in addressing air quality issues, which in turn will see positive benefits against open space provision and flood risk mitigation. However, whether these benefits materialise will be dependent on the scheme that comes forwards, and the way they seek to achieve air quality positive/neutral status.</p>																								

This policy is not applicable to housing; crime prevention and community safety; community identity; waste management; land and soil; employment; investment; education and skills; and, efficient infrastructure.

This policy will have a neutral impact on the following ‘protected characteristics’: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. However, this policy could have positive impacts on the groups ‘age’ and ‘pregnancy and maternity’, as the elderly and young have higher vulnerability to the impacts of poor air quality, and there is emerging evidence that suggests the impacts that exposure to air pollution can have on pregnant women and their unborn child.

Alternative Policy – Rely on London Plan Policy (S1)

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	n/a	+	n/a	n/a	n/a	?	n/a	+	+	+	+	n/a	+	+	n/a	+	+	+	n/a	n/a	n/a	n/a

This policy will have positive impacts on prosperity, addressing inequalities and social inclusion; health and well-being; quality of surroundings; water quality and resources; environmental health; biodiversity; climate change adaption; and climate change mitigation. London Plan policy supports improvements which will improve London’s air quality and reduce exposure to poor air, requires all developments to make provision for improved air quality and major developments to be at least air quality neutral. This policy will have a number of positive impacts on the borough’s residents and environment. These benefits include: improving the health of the borough’s population, particularly those who are considered to be vulnerable; improving liveability; reducing health inequalities; support the creation of a healthy environment for the borough’s residents; reducing the impact that poor air quality has on the borough’s environment, such as limiting their ability to grow and function; and, reducing the impact that poor air quality has on the borough’s waterbodies. Although it is not stipulated within this policy, there is a requirement for major developments to include an element of urban greening. Urban greening will not only contribute to improving local air quality, but could lead to an increase in green space within the borough and help to support and protect the borough’s biodiversity, improve flood resilience and contribute to creating an attractive landscape and townscape. It is considered that this policy will have positive impacts on the following protected characteristic: ‘age’. It is widely documented that the elderly and young have higher vulnerability to the impacts of poor air quality, due to adverse effects that it can have on their health. Therefore, improvements to the air quality within the borough is likely to see positive impacts on these age categories. Evidence is emerging which highlights the impacts that exposure to air pollution can have on pregnant women and their unborn child. Improving air quality within the borough can reduce such risks.

Furthermore, poor air quality is not evenly distributed across the borough, or within London, with some areas more likely to be affected by poor air quality than others due to wider problems of poverty. Therefore, improvements to the air quality within the borough, as a

result of implementing the above policy, could lead to improvements in the health and well-being, and living conditions of residents within impoverished areas.

This policy will have uncertain impacts on traffic. A number of measures can be implemented on site which could contribute to a development achieving air quality neutral or air quality positive status. In regards to traffic, measures which can be implemented to improve air quality include the promotion of active travel and improvements to public transport. Whether these measures are implemented is dependent on whether they could forward within a scheme, as they are not required as part of Policy S1.

This policy is not applicable to housing; crime prevention and community safety; community identity; waste management; historic environments and cultural assets; land and soils; employment; investment; education and skills; and, efficient infrastructure.

This policy will have a neutral impact on the following ‘protected characteristics’: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. However, this policy could have positive impacts on the groups ‘age’ and ‘pregnancy and maternity’, as the elderly and young have higher vulnerability to the impacts of poor air quality, and there is emerging evidence that suggests the impacts that exposure to air pollution can have on pregnant women and their unborn child.

Preferred Approach: BSUI3 Managing Flood Risk

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	?	n/a	n/a	n/a	n/a	?	n/a	+	0	0	0	n/a	+	+	n/a	0	++	+	n/a	n/a	n/a	n/a

This policy will have positive impacts on improving water quality; climate change mitigation; climate change adaption; flood risk; and growth and regeneration. Reducing flood risk within the borough will have a number of positive impacts for the borough’s residents and environments, which include: ensuring the borough’s residents are safe against the impacts of flooding; promoting water efficiency; and contribute to the borough’s mitigation and adaption against the impacts of climate change. Furthermore, the impacts of flooding can cause huge economic costs. Therefore, creating an environment with reduced flood risk is likely in the long-term to encourage people to want to remain in Brent, and provide and attractive and safe environment for people to live, work and establish businesses.

This policy will have mixed benefits on housing. This policy will ensure that buildings and homes are adaptable to flood risk in the long term. However, due to incorporating flood mitigation and adaption measures into a development scheme, it is possible that the density of the site will not be maximised, which in turn can impact on the deliverability of housing.

The policy will not have any significant effects on prosperity, addressing inequalities and social inclusion; health and wellbeing; accessibility; reducing the effects of traffic; environmental health; biodiversity; landscape and townscape; open space

This policy is not applicable to housing; crime prevention and community safety; community identity; waste management; historic environments and cultural assets; land and soils; employment; investment; education and skills; and, efficient infrastructure.

This policy will have a neutral impact on the following ‘protected characteristics’: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. The policy seeks to ensure that the risk of flooding to people and properties is minimised by applying the sequential approach.

Alternative Approach – Rely on London Plan Policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	?	+	n/a	n/a	n/a	n/a	n/a	+	+	+	+	n/a	+	+	n/a	+	+	+	n/a	n/a	n/a	n/a

Relying on London Plan Policy S112 will have positive impacts on health and well-being; quality of surroundings; water quality and resources; environmental health; biodiversity; climate change mitigation; climate change adaption; open space; flood risk; and growth and regeneration. London Plan policy seeks to address current and expected flood risk for all development within London in a sustainable and cost effective way. Positive impacts associated within this policy approach include: protecting residents and their homes from the impacts of flooding; offer some protection to the borough’s water quality; the requirement for natural flood management method in development proposals can lead to additional green space within the borough, which in turn can assist in improving local air quality, improve the attractiveness of the borough’s landscape, enable residents to access the number of health benefits associated with open space and protect and enhance the borough’s biodiversity. Furthermore, this policy and its requirement for natural flood management methods, will, contribute to the borough’s mitigation and adaption to the impacts of climate change through minimising the impact of flooding, increasing flood storage and combating the impacts of the urban heat island effect. Protecting

the borough from flood risk can contribute to the borough’s growth and regeneration through minimising the potential for flood damage, and their associated interruption to economic activity.

This policy will have unknown effects on housing. This policy will ensure that buildings and homes are safe from the impacts of flooding. However, for some sites the incorporation of on-site water attenuation schemes could impact on the density achieved. However, it is possible that through the layout and design of scheme this impact can be mitigated.

It is predicted that this policy will have no significant effect on prosperity, addressing inequalities and social inclusion.

This policy is not applicable to crime prevention and community safety; community identity; accessibility; traffic; waste management; historic environment and cultural assets; land and soil; employment; investment; education and skills; and efficient infrastructure.

This policy will have neutral impacts on the following ‘protected characteristics’: disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation, age and pregnancy and maternity.

Conclusion: The preferred policy approach adopts a more local approach to tackling flood risk within the borough, and has been informed by the findings of the Joint West London SFRA (2018). The draft London Plan adopts a strategic approach to addressing flood risk within London.

Preferred Approach: BSUI4 On site water management and surface water attenuation																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		0	?	?	?	n/a	n/a	n/a	n/a	n/a	+	?	?	0	n/a	+	+	?	?	++	+	n/a	n/a	n/a
<p>This policy will have positive impacts on improving water quality and resources; climate change mitigation; climate change adaption; flood risk; growth and regeneration. Requiring developments to incorporate on site water management and surface water attenuation measures will have a number of positive impacts for the borough’s residents and environments, which include: ensuring the borough’s residents are safe against the impacts of flooding; promoting water efficiency; and contributing to the borough’s mitigation and adaption against the impact of climate change. Furthermore, this policy will offer some protection to the water quality of the borough’s water bodies through reducing the amount of pollutants that are washed into them as a result of surface-water runoff; reduce surface water run-off rates which in turn can reduced combined sewer overflow events; and, reduce the risk of flooding for the</p>																								

borough's residents. Flooding can result in high economic costs; therefore, protecting the borough from its impacts will have a positive impact on the borough's economy.

This policy will have unknown effects on health and well-being; housing; quality of surroundings; biodiversity; environmental health; and open space. The impact that this policy will have on health and well-being, biodiversity, open space and environmental health is dependent on the SuDS scheme that comes forward – a natural SuDS scheme which incorporates green space, will enable residents to access the health benefits, associated with open space, contribute to improving air quality, provide additional habitats and open space, and act as a filter to noise. Such benefits will not materialise from mechanical SuDS schemes. **It should be noted that within the supporting text for this policy the Council has stated that it has a preference for more natural SuDS.** This policy will ensure that buildings and homes are safe from the impacts of flooding. However, for some sites the incorporation of on-site water attenuation schemes could impact on the density achieved. However, it is possible that through the layout and design of scheme this impact can be mitigated.

It is predicted that this policy will have no significant effects on prosperity, addressing inequalities and social inclusion; landscape and town scape

This policy is not applicable to crime prevention and community safety; traffic; community identity; accessibility; waste management; historic environment and cultural assets; employment; education and skills; and efficient infrastructure.

This policy will have neutral impacts on the following 'protected characteristics': disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation, age, pregnancy or maternity.

Alternative Policy Approach : Rely on London Plan Policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	?	+	n/a	n/a	n/a	n/a	n/a	+	+	+	0	n/a	+	+	+	+	++	+	n/a	n/a	n/a	n/a

The London Plan Policy seeks to ensure that developments adhere to the drainage strategy detailed in the Plan, achieve green-field run-off rates and ensure that water run-off is appropriately managed. **This policy approach will have positive impacts on: health and wellbeing; quality of surroundings; water quality and resources; biodiversity; climate change mitigation and climate change adaption; land and soil; open space; flood risk and growth and regeneration.** This policy approach will have a number of positive impacts for the borough's residents and environments which include: ensuring the borough's residents are safe against the

impacts of flooding; promoting water efficiency; and contributing to the borough's mitigation and adaptation against the impact of climate change. Furthermore, this policy will offer some protection to the water quality of the borough's water bodies through reducing the amount of pollutants that are washed into them as a result of surface-water runoff; reduce surface water run-off rates which in turn can reduce combined sewer overflow events; and, reduce the risk of flooding for the borough's residents. Flooding can result in high economic costs; therefore, protecting the borough from its impacts will have a positive impact on the borough's economy. As identified in Policy SI13, there is a preference for green SuDS over grey SuDS. This preference could lead to an increase in green space provision within the borough, which in turn can lead to a number of health and well-being benefits (i.e. reduced stress, active lifestyles), benefits to the environmental health of the borough (i.e. helping to improve air quality, and reducing the impact of noise pollution) and supporting the borough's biodiversity.

It is predicted that this policy will have unknown effects on housing. This policy will ensure that buildings and homes are safe from the impacts of flooding. However, for some sites the incorporation of on-site water attenuation schemes could impact on the density achieved. However, it is possible that through the layout and design of scheme this impact can be mitigated.

It is predicted that this policy will have neutral impacts on social inclusion and reducing inequalities and landscape and townscape.

This policy approach is not applicable to crime prevention and community safety; community identity; accessibility; traffic; historic environment and cultural assets; employment; investment; education and skills; and efficient infrastructure.

This policy will have neutral impacts on the following 'protected characteristics': disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation, age, pregnancy or maternity.

Conclusion: The preferred policy approach, in comparison to relying on London Plan policy, enables a more local approach to on-site water management to be adopted. Furthermore, it takes into consideration the findings of the West London SFRA, which was completed in 2018. Although a preference for natural SuDS is included within the supporting text for the preferred policy, it may be beneficial to include a steer within the policy itself.

Transport

Policy BT1 : Sustainable Travel Choice																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	+	+	+	+	0	?	++	0	+	?	+	+	0	+	+	0	0	+	+	+	+	0	++
<p>Social impacts are predominantly positive. Streets designed to healthy streets standards promote social interaction, which can benefit community cohesion. Designing to meet these principles and providing access to all will also benefit those with limited mobility. They also incorporate resting places, which can be of particular benefit to people with reduced mobility including pregnant women, disability groups and the elderly. Ensuring streets are designed to the Mayor’s Public London Charter will ensure certain groups don’t feel excluded from spaces. This has been highlighted as an issue for young people in the borough. The West London Orbital will increase public transport access levels in parts of the borough which experience high levels of deprivation, including Neasden, Harlesden and Church End. As public transport is more affordable than private vehicle ownership, this will improve access to services and employment for these communities and could help reduce social exclusion.</p> <p>Promoting the use of active travel such as walking and cycling over private vehicle has recognised health benefits. Children aged five–18 are recommended to do at least 60 minutes of moderate intensity activity (brisk walking or cycling) each day, while adults are recommended to do 150 minutes each week in periods of ten minutes or more. Active travel will help ensure everyone is achieving the level of exercise needed to stay physically healthy, which in turn has mental health benefits. Reducing harmful air pollution from private vehicles will also have positive health impacts. Air pollution caused by carcinogenic diesel emissions, high levels of nitrogen dioxide (NO2) and particulate matter (PM) exacerbate health conditions and shorten the lives of Londoners. The communities suffering the most from poor air quality are often the most vulnerable in society.</p> <p>The West London Orbital will increase public transport accessibility levels, which will improve the deliverability of sites for housing. This will enable higher density housing to be delivered, increasing the level of housing and affordable housing delivered.</p> <p>The creation of high quality walking and cycling routes, meeting standards such as healthy streets, will enhance the public realm. This can encourage increased use of public spaces, which will reduce crime and increase feelings of safety.</p> <p>The West London Orbital will improve access to services for those living in the surrounding area. It will improve connections to Harlesden, Church End and Cricklewood Town Centre. It will also improve connectivity to Old Oak and Brent Cross where new and</p>																								

extended town centres are planned. This could encourage people to shop outside of the borough and negatively impact on Brent's town centres. The impacts are uncertain and will be dependent on how town centres adapt their offer to take advantage of increased connectivity. Designing to healthy streets standards and enhancing the A5 corridor and North Circular could assist with this by improving the quality of environment in town centres, particularly Neasden, Kilburn and Cricklewood. A higher quality environment will help increase footfall and support the vitality of these centres. Improved Wi-Fi coverage will also benefit town centre viability, enabling businesses to better promote themselves online and encouraging visits to town centres from people looking to work remotely.

Environmental impacts are overall positive. The policy will reduce traffic volumes by promoting sustainable travel modes over vehicle use. The creation of attractive routes will promote walking and cycling. Increasing Wi-Fi coverage will also reduce the need to travel by car. This will reduce congestion, with associated benefits for air quality and carbon emissions.

The West London Orbital will increase the usage of the Dudding Hill Freight Line, which will increase noise pollution. However, reducing vehicles on the road network can also reduce noise pollution. Impacts are uncertain. As the West London Orbital utilises an existing freight line other visual and environmental impacts are likely to be neutral.

Healthy streets are designed to incorporate sustainable urban drainage systems and green infrastructure, which will help to reduce surface water flooding, promote biodiversity which could help improve water quality. Tree planting will also increase shade which can help mitigate the impacts of climate change. This will be of particular benefit to groups susceptible to rising temperatures, such as the elderly, by creating shaded spaces where it is comfortable to walk. The creation of high quality walking and cycling routes, can contribute to creating an attractive public realm. As will reducing car dominance along the A5.

Economic impacts are overall positive. Reducing road congestion will create a more efficient transport network, which will benefit business by improving reliability. Wi-Fi is increasingly important to businesses. Employees are increasingly required to adopt flexible working practices. Increased Wi-Fi coverage will enable home working and remote working from locations such as cafes. This may be of particular benefit to groups with reduced mobility levels by ensuring they can access training and employment opportunities from home. The West London Orbital will improve connections from the borough to Central London, Old Oak and Brent Cross. This will help open up access to job opportunities and reduce commuting times.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. Designing to healthy streets standards could have particularly positive impacts for the protected characteristics of age, disability and pregnancy and maternity, as it creates a pedestrian environment which is easier to navigate with resting places. This could

be particularly beneficial for the visually impaired and those using wheelchairs or pushchairs. The West London Orbital could provide positive impacts for disability groups, pregnant women and people on maternity that may have reduced mobility, if stations provide step free access.

Alternative Policy: To prioritise travel by car

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	-	-	0	0	0	0	-	0	0	-	0	0	0	-	0	0	-	-	-	0	-	0	-

Social impacts are likely to be neutral or negative. Prioritising travel by car by public transport will result in increased levels of congestion, resulting in a road network which is unreliable. Travel by private vehicle does not create the same opportunities for interaction as active travel and public transport, so is unlikely to promote social integration or improve feelings of safety.

Prioritising travel by car will result in higher levels of road congestion and be detrimental to air quality. This will create an environment which is less appealing to walk and cycle in, which will lead to more sedentary lifestyle. Overall this will result in negative impacts for physical and mental health.

Under national and London Plan policy higher density development are to be promoted in areas with higher public transport accessibility levels. Prioritising travel by car will not increase public transport accessibility levels and therefore not enable housing delivery.

Prioritising travel by car may improve access to town centres for some, but a car dominated environment will not create centres which are attractive to spend time and linger. This could result in reduced footfall and spend. Impacts are likely to be neutral.

With the level of population growth, the borough will experience prioritising travel by car will increase road congestion, resulting in reduced air quality and carbon emissions.

Environmental impacts are likely to be negative. The creation of new roads will require additional land take. As Brent is a heavily urbanised borough the creation of new roads would require reconfiguration of existing uses, which could require compulsory purchase, or development on open space. This option could place pressure on existing open space.

Private vehicle use is a major contributing factor to carbon emissions and climate change.

Car travel is reliant on impermeable surfaces including the road network and parking spaces, which increase the flow of surface water run-off which is a contributing factor to flooding. There is scope to include planting as part of highway works, but this is more limited than on pedestrian and cycle routes due to the need for greater land take and operational requirements.

Economic impacts are likely to be negative. Increased reliance on the road network will result in higher levels of congestion and longer commuting times. An unreliable transport network will impact on the efficiency of business, particularly freight distribution.

It is considered that this policy will a neutral impact people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. All groups will be impacted by congestion and associated environmental impacts.

Alternative Policy: To not enable the delivery of the West London Orbital

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	0	-	0	0	0	0	-	0	0	?	0	0	0	-	0	0	0	0	0	0	0	0	0

Social impacts are likely to be neutral or negative. Neasden, Church End and Harlesden will not benefit from improved access to public transport, therefore benefits in terms of reducing social exclusion will not be felt. An increase in public transport accessibility levels will not be achieved and housing delivery will not be enabled. Access to Church End, Harlesden and Neasden Town Centres will not be improved. Equally, access to competing centres will also not be improved so impacts are likely to be neutral.

Environmental impacts are likely to be neutral or negative. If the West London Orbital route is not delivered there will not be associated benefits in removing pressure from the road network. This includes reduced carbon emissions and air quality improvements. Whilst not delivering the West London Orbital will mean noise pollution does not increase along the line at set times, traffic volumes will increase which also generate noise pollution.

Economic impacts are likely to be neutral. The economic growth associated with better connections to Central London and Old Oak and Brent Cross opportunity areas will not be realised.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. This policy option would not result in a change to the existing situation.

Conclusion

Prioritising active and sustainable travel over private vehicle use results in a higher level of positive social, environmental and economic impacts. Reducing pressure on the road network will reduce air pollution, carbon dioxide emissions and improve efficiency for business. The IIA indicates this approach results in more positive impacts than promoting private vehicle use.

The West London Orbital has positive impacts associated with increasing housing delivery, reducing road congestion and increasing access to employment and services. One potential negative impacts are noise pollution due to increased services running along the line. The detailed design of the West London Orbital will need to consider how noise impacts can be mitigated.

Policy BT2: Parking and car free development

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	0	+	0	0	0	+	0	+	+	+	+	0	+	0	0	0	+	0	0	0	0	0

Social impacts are positive or neutral. Some groups are less mobile such as older people and disability groups, meaning reduced access to a vehicle could impact on their ability to access services and cause social isolation. However, the policy allows for car parking for blue badge holders, which are those identified to need car parking due to mobility issues. Car free is only sought in areas with good access to public transport, so people will still have good access to services, and some of those with a disability (e.g. those who are blind or partially sighted) may be more reliant on public transport. Reducing space in developments allocated to private vehicles will create a public realm which is more pedestrian friendly with greater opportunities for social interaction. Additionally, the London Plan sets minimum disabled parking standards, which would continue to apply. On balance impacts on social inclusion are anticipated to be neutral.

Promoting the use of active travel such as walking and cycling over private vehicle has recognised health benefits. Children aged five–18 are recommended to do at least 60 minutes of moderate intensity activity (brisk walking or cycling) each day, while adults are recommended to do 150 minutes each week in periods of ten minutes or more. Active travel will help ensure everyone is achieving

the level of exercise needed to stay physically healthy, which in turn has mental health benefits. Reducing harmful air pollution from private vehicles will also have positive health impacts. Air pollution caused by carcinogenic diesel emissions, high levels of nitrogen dioxide (NO₂) and particulate matter (PM) exacerbate health conditions and shorten the lives of Londoners. The communities suffering the most from poor air quality are often the most vulnerable in society.

The policy includes criteria to ensure off-street parking does not impact on the setting and character of the surrounding area. For example, by removing features such as trees or gardens. Cumulatively the loss of these features can detrimentally impact on the character of an area.

The policy allows for higher levels of car parking in areas with lower levels of access to public transport. This should ensure it does not impede access to essential services. The policy also protects against the loss of needed car parking in town centres.

Environmental impacts are predominantly positive. The policy will reduce traffic volumes by promoting use of public transport in areas with good access. There are environmental benefits associated with reducing traffic on the roads including improved air quality and reduced release of carbon dioxide.

Ensuring off-street car parking incorporates soft landscaping, permeable surfaces and preserves trees will cumulatively have benefits for biodiversity. It will also slow the flow of water to drains and water bodies, which will reduce the risk of surface water flooding and help to improve water quality.

Economic impacts are neutral. Some of the borough's employment areas are in areas with lower public transport access, meaning businesses can be more reliant on private vehicles. Restricting car parking could have detrimental impacts on these businesses. However, in setting car parking standards account has been taken of public transport accessibility levels have been considered and a level has been set which takes into account operational requirements. If parking is not controlled at all this will result in congestion on the road network which will reduce its reliability and be detrimental to the economy. Taking this into account impacts are likely to be neutral.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. London Plan policy sets minimum disabled parking standards which would continue to apply, therefore disabled groups would not be negatively impacted by this policy.

Alternative Policy : No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		0	-	0	-	0	0	0	-	0	-	-	-	-	0	-	0	0	0	-	-	0	0	0
<p>Social impacts are neutral or negative. Should policy set no controls on levels of car parking, this could result in car dominant developments. The result would be high levels of congestion on the road network, poor air quality. This would deter walking and cycling resulting in negative impacts to health and well-being.</p> <p>Environmental impacts are predominantly negative. Without a policy traffic volumes are likely to increase, resulting in poorer air quality and increased carbon emissions. This is likely to deter people from choosing active travel such as walking and cycling. Allowing off-street parking without any controls could result in the loss of trees and gardens, which will cumulatively impact on the character of an area.</p> <p>The cumulative loss of gardens and trees through the unmanaged creation of off-street parking in cumulating will impact on biodiversity. It will also increase surface water flooding due to an increase in impermeable surfaces. This could have negative impacts on water quality as green infrastructure can slow the flow of water and help to remove pollutants before it reaches a water body.</p> <p>No restrictions on parking could be beneficial for the operation of some businesses. However, this would increase congestion on the road network and reliability, which would ultimately negative impact on economic growth.</p> <p>It is considered that this policy will have no different effects on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.</p>																								
<p>Conclusion</p> <p>Not having a policy will result in negative social and economic impacts due to increased congestion impacting on air quality, increased carbon emissions and reducing active travel. Although there are potential negative impacts on groups with lower mobility, this is mitigated as the policy allows for blue badge parking and only requires car free development where there are good public</p>																								

transport accessibility levels. In addition, allowing in unmanaged conversion of front gardens to car parking will cumulatively impact negatively on biodiversity, flood risk and water quality. The IIA indicates a policy is needed to manage car parking.

Policy BT3: Freight and servicing																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		0	+	0	0	0	0	+	+	0	0	+	0	0	0	+	0	0	0	0	+	0	0	+
<p>Social impacts are generally neutral. Ensuring adequate servicing is important to the function of town centres therefore there may be some positive impacts on their vitality and viability. Promoting sustainable modes of travel over vehicles will help to improve air quality. Poor air quality is associated with respiratory disease, cardiovascular disease and asthma. This will have positive health impacts.</p> <p>Environmental impacts are predominantly positive. Promoting the use of the Grand Union Canal and railway lines for freight takes pressure off the transport network and reduces congestion. This will reduce air pollution and carbon dioxide emissions.</p> <p>Economic impacts are predominantly positive. The efficient movement of freight is important to economic growth, particularly given logistics is a future growth sector. It is also important for the function of our town centres. The use of the canal and rail can facilitate efficiency in freight distribution which will in turn attract inward investment.</p> <p>There will be positive impacts on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. It is considered that all groups will benefit from efficient freight deliveries.</p>																								
Alternative Policy: No policy																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		0	0	0	0	0	.	.	0	0	0	.	0	0	0	0	0	0	0	0	.	0	0	.

Social impacts are generally neutral. There will be potential negative impacts for the vitality and viability of town centres as servicing is essential to their functioning.

Environmental impacts are predominantly negative. Freight is a source of congestion on the borough’s road network. If freight is not directed to more sustainable modes including canal and rail, it will continue to contribute to congestion, which will have negative impacts on air quality and carbon emissions.

Economic impacts are predominantly negative. Road congestion will impact on the reliability of freight movement which will have negative economic impacts and deter future investment in the borough’s economy.

It is considered that this policy will have neutral impacts on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age.

Conclusion

The preferred option will reduce road congestion resulting in positive environmental and economic impacts. In addition, ensuring sufficient servicing will have benefits for the function and on-going viability of town centres. The IIA indicates a policy is needed to promote freight by sustainable modes and ensure adequate servicing of development.

Policy BT4: Forming an Access onto a Road

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	+	0	+	0	0	0	+	0	0	+	+	+	0	+	0	0	0	+	+	0	+	0	+

Social impacts are generally neutral or positive. As the focus of the policy is access on to the highway network impacts on the majority of social objectives are anticipated to be neutral. Ensuring road access is located at a safe point and requiring a safety audit for major developments abutting the North Circular Road will reduce road accidents, creating a safer environment to walk and cycle. This will have a positive impact on health and well-being. The creation of off street parking can impact on the quality of surroundings by resulting in the removal of trees and planting. This policy makes visual impact a consideration when assessing the suitability of off-street parking. This will have a positive impact on quality of surroundings.

Environmental impacts are predominantly positive. By creating a safer road environment this policy will help to encourage walking and cycling. It will also reduce road congestion by managing traffic flow on to the Transport for London Route Network and London Distributor Roads. In turn this can have positive impacts on air quality and reduce carbon emissions. This policy can have positive impacts on townscape by ensuring the creation of off-street parking doesn't negatively impact on public realm through the loss of trees. The protection of trees can have positive impacts as they support biodiversity and can help reduce flood risk.

Economic impacts are predominantly positive an efficient road network is important to economic growth, improved accessibility and efficient freight distribution.

This policy will have a positive impact on road safety which will benefit all groups. This policy will therefore have a positive impact on groups with the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age.

Alternative Policy : No policy

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	0	-	0	-	0	0	0	0	-	0	0	-	-	-	0	-	0	0	0	-	-	0	-	0

Impacts in relation to social objectives are generally neutral, with negative impacts anticipated on health and well-being. Allowing access point to be created onto a road without consideration for road safety could increase road accidents and negatively impact on health and well-being. Without a policy off-street parking could be created without any consideration to visual impact including loss of trees. This would be detrimental to quality of surroundings.

Environmental impacts are predominantly negative. Allowing the creation of additional access points on to the highway network in an unmanaged way will increase road congestions which will have negative impacts on air quality and increase carbon emissions. The unmanaged creation of off-street parking will result in the loss of trees and other landscaping, which cumulatively will have negative impacts on biodiversity, flood risk and townscape.

Economic impacts are predominantly negative. Failure to manage the road network and the creation of congestion can have negative impacts on economic growth. It will slow down the movement of freight and people to work, which will impact on business.

It is considered that this policy will have a negative impact on people who have the following protected characteristics: disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, age. All groups will be affected by a failure to manage access onto the road network.

Conclusion

Failure to manage access onto the road network will create road congestion and could impact on the safety of road users. This will result in negative social, economic and environmental impacts. In addition, allowing the creation of off-street parking without consideration of visual impacts could have negative environmental impacts through the loss of trees. The IIA indicates a policy is needed to control access on to the highway network to mitigate potential detrimental impacts from development.

Policy BCGA1: Wembley Growth Area																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	+	+	+	-	+	+/-	+	+	+	+/-	+	+	+	?	+	+	+	+	+
<p>Social impacts are considered to be positive. The policy will promote social inclusion and narrow inequalities, improve the health of the population by way of driving the economic regeneration of Brent, creating a sustainable city quarter with a variety of new jobs in different sectors. The policy will increase accessibility to health facilities through the creation of new public open spaces and new health facilities and will increase housing delivery in an area with anticipated employment growth and good transport links. Development will be focused around areas with high transport accessibility, and the council regularly liaises with TfL regarding bus routes. The Local Plan is aligned with the Transport Local Implementation Plan which sets out how improvements will be secured. This will help to ensure that residents – for example, those with a disability – are not isolated within areas where transport accessibility has failed to improve.</p> <p>Environmental impacts are considered to be positive, due the policy supporting improvements to ensure that physical pedestrian and cycle route linkages from Wembley Triangle to Forty Lane / Bridge Road will be provided, in addition to proposed naturalisation of Wealdstone Brook and supporting to energy efficient design and renewable energy. The policy also encourages the provision of new public open space including a 7-acre park.</p> <p>Economic impacts are considered to be positive due to increased employment and investment opportunities.</p>																								

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Wembley Growth Area.

Policy BNGA1: Burnt Oak / Colindale Growth Area

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	0	0	+	+	-	0	+/-	+	+	+	0	0	+	+	?	+	+	+	0	+

Social impacts are considered to be positive. The delivery of over 2000 new homes will contribute towards the overall housing numbers required to provide everybody with an opportunity to live in a home which is suitable to their identified needs. Provision of new play areas and open space will contribute towards health and wellbeing.

Environmental impacts are considered to be positive. Seeking to reduce traffic dominance of Edgware Road through public realm improvements, including urban greening, will contribute towards environmental health and supporting an attractive and clean environment, enhancing the borough’s landscape and townscape. Reduced car dependency will also contribute towards improved environmental health and mitigate against climate change. Creating a sense of place through quality design that compliments the existing heritage of the area will also enhance the borough’s landscape and townscape.

Economic impacts are considered to be positive. Proposed new ground floor commercial and employment uses will contribute towards employment opportunities and help to promote sustainable, resilient and inclusive economic growth. The existing LSIS sites will be subject to master planning with a view to being regenerated, to provide updated employment space that meets existing and future needs, through co-location with other uses. This will help to facilitate both indigenous and inward investment in the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North area of Brent.

Policy BSGA1 – Church End Growth Area

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	+	+	+	+	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+

Social impacts are considered to be predominantly positive. The policy proposes the delivery of 1040 new homes, supported by social and physical infrastructure, including a new space to serve as an employment, community and health hub. This will help reduce social exclusion, increase health and wellbeing and contribute towards providing everybody the opportunity to live in a home which is suitable to their identified needs. Mixed used regeneration and revitalisation of the local centre will use the highest standards of urban design, which will change the perception to a busy, thriving, safe and secure neighbourhood, which will enhance community safety.

Environmental impacts are considered to be predominantly positive. The policy proposes enhancements to Church End Open Space and Willesden Jewish Cemetery, and increased greening through tree planting and creation of new open space in site allocations.

Economic impacts are considered to be predominantly positive. A new 6th form entry secondary school and college will support maximisation of education and skills, while redevelopment of industrial sites for co-location to secure investment in new employment floor space will encourage both indigenous and inward investment within the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Church End Growth Area of Brent.

Policy BSEGA1 – South Kilburn Growth Area																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+	+	+	+	+	+	+	-	0	-/+	+	+	+	0	+	+	+	+	+	+	+	+
<p>Social impacts are predominantly positive. The policy promotes the re-provision of social rented housing for existing tenants of South Kilburn, and elsewhere a mix of tenures to meet the needs of the wider population, linking into ensuring that everybody is able to live in a home that meets their needs. The provision of a new South Kilburn Health Centre within the Peel Site will support health and wellbeing, while the retention of the enterprise hub and community space will support community identify and community cohesion.</p> <p>Environmental impacts are predominantly positive. The policy promotes the enhancement of public realm and increased tree planting, and the extension of South Kilburn Park and additional public open space.</p> <p>Economic impacts are predominantly positive. The expansion of the South Kilburn Park Junior School and Carlton Vale Infant School will help to maximise the potential for everybody to contribute economically through increasing and improving the provision of education facilities, while the enhancement of retail provision in the neighbourhood parade on Malvern Road will help to support the viability and vitality of the local economy.</p> <p>Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.</p> <p>In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South East area of Brent.</p>																								

Policy BSWGA1 – Alperton Growth Area																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	+	+	+	+	?	+	+	+	0
<p>Social Impacts are considered to be predominantly positive. The policy supports an increase in housing delivery by way of provision of over 6000 additional homes, increasing the opportunities for everybody to live in a home which is suitable to their identified needs. The policy also supports the provision of a new nursery and health facilities, and multi-use community centres, which will support improved health and wellbeing and community cohesion, reducing social exclusion.</p> <p>Environmental Impacts are considered to be predominantly positive. Investment in the canal and its setting will enhance its role as an important environmental, recreational and movement corridor. Energy efficient design and renewable energy are encouraged, to help to mitigate against climate change. The policy also proposes improvements to existing public open space, the creation of a new 1-hectare public open space, and new tree planting.</p> <p>Economic impacts are considered to be predominantly positive. The policy proposes that Alperton will be encouraged to become an enterprise hub, principally through new business and employment floorspace within residential developments. This will increase employment opportunities and will encourage investment.</p> <p>Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.</p> <p>In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Alperton Growth Area.</p>																								

7. Publication Stage Site Allocations Appraisal

7.1 Due to changes in the methodology of appraising site allocations following the Publication Stage of consultation, all site allocations have been re-assessed. The previous Publication Stage Site Allocations Appraisals can be found in the [Publication Stage Integrated Impact Assessment](#).

7.2 Submission Stage Site Allocation Assessments can be found in Chapter 9.

8. Submission Stage Local Plan Policies

4.1. This chapter details the final chosen policies for the Submission Stage of the Local Plan, as assessed against the IIA framework.

4.2. A number of major and minor modifications have been made to the Local Plan following comments received at Publication Stage. However, not all of these have resulted in changes to the appraisals of the associated policies. Additionally, some of these may have resulted in changes to the appraisals of the policies but not resulted in any changes to the scores of the policies against the identified objectives. The following policies have not experienced any major or minor modifications that have resulted in any changes to appraisals or scores when measured against IIA objectives: DMP1, BD1, BD2, BD3, BH2, BH5, BH6, BH7, BH8, BH9, BH10, BH11, BH12, BH13, BS11, BE1, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BSUI4, BT1, BT2, BT3, BT4, BP1, BP7.

4.3. Scoring and appraisal changes are outlined below. Assessments of the policies discussed in the table below can be found later in this chapter.

IIA scoring and appraisal changes as a result of Main Modifications

Policy Ref	Proposed Changes to Policy Appraisal in IIA	Proposed IIA Scoring Changes
BP2	Change from intensification of “employment” to “particular business and industrial” to reflect the proposed change to policy	No change. The IIA Objectives do not refer to particular job types / business types
BP2	Addition of reference to provision of new education, health and cultural facilities	<ul style="list-style-type: none"> • Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area • Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area

		<ul style="list-style-type: none"> • Change S2 from “minor positive” to “significant” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area
BP3	Addition of reference to provision of new education, health and cultural facilities	<ul style="list-style-type: none"> • Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area • Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area • Change S2 from “minor positive” to “significant positive” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area
BP4	Addition of reference to provision of new education, health and cultural facilities	<ul style="list-style-type: none"> • Change EC4 from “neutral” to “significant positive” due to provision of new educational facilities in a large area • Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area • Change S2 from “minor positive” to “significant positive” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area
BP5	Addition of reference to provision of new education, health and cultural facilities	<ul style="list-style-type: none"> • Change EC4 from “neutral” to “significant positive” due to provision of new educational facilities in a large area • Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area • Change S2 from “minor positive” to “significant positive” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area
BP6	Addition of reference to provision of new education, health and cultural facilities	<ul style="list-style-type: none"> • Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area

		<ul style="list-style-type: none"> • Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area • Change S2 from “minor positive” to “significant positive” due to provision of new health facilities in a large area • Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area
BH1	Minimum housing numbers have reduced from 27,482 to 23,250.	No change to scorings. The reduction in numbers relates to an amendment to the Intend to Publish version of the London Plan to be used for monitoring purposes. The draft Brent Local Plan previously identified that it could not meet the earlier draft London Plan target as the Council considered this unrealistic taking account of Brent’s circumstances. The overall projected delivery of housing as a result of the Local Plan has not changed, as such there are not considered to be any changes to the policy’s outputs.
BH3	Addition of reference to “build to rent”.	No change to scorings. It is not considered that this would result in any changes to social objectives as generally the affordability of build to rent products will be the same as those of private rented products.
BH4	The policy has been amended to provide more detail and justification given the removal of H2A from the Intend to Publish version of the London Plan. While the policy still emphasises that the development of small sites within priority locations of PTAL 3-6 will be supported, the amended policy notes the support of such developments within intensification corridors and town centre boundaries. The amended policy also gives more detail as to the requirements for proposed developments outside of these priority locations, including weight being given to the existing area’s character, access to public transport and social infrastructure, prejudicing more comprehensive development and being	<ul style="list-style-type: none"> • Change EN12 from “neutral” to “minor positive” due to the added emphasis on the Urban Greening Factor having potential to reduce flood risk on sites • Change EN9 from “neutral” to “minor positive” due to the added emphasis on the Urban Greening Factor having potential to reduce overheating / the urban heat island effect • Change EN5 from “neutral” to “minor positive” due to the added emphasis on the Urban Greening Factor having potential to provide increased opportunities for green infrastructure / biodiversity <p>Even though the new policy may result in more homes being built (due to increased flexibility), it is not considered that this would result in S3 changing from “minor positive”.</p>

	required to deliver an Urban Greening Factor of 0.4.	
BE2	Change from securing new “employment” floorspace to “industrial” to reflect the policy	No change. The IIA Objectives do not refer to particular job types / business types
BE3	Clarify that protection of employment sites refers to sites in industrial use, to reflect change to policy.	No change. The IIA Objectives do not refer to particular job types / business types

Table 8: Scoring and Appraisal Changes due to Main Modifications

Updated Policy Assessments

Policy BP2: East																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	++	++	++	-	+	+/-	+	+	+	0	0	+	+	+	++	+	++	++	+
<p>Social impacts are considered to be positive. Social inclusion will be increased and opportunities will be provided for everybody to live in a home which his suitable to their identified need through the potential residential development for Staples Corner Growth Area and Neasden Station’s Growth Area, taking into account potential specific requirements around different housing types, such as specialist (older people / supported / student) housing and build to rent. Community identity will be supported through securing the retention of the area’s religious buildings. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.</p> <p>Environmental impacts are considered to be positive. Attractive and clean environments will be enhanced through conserving and enhancing heritage assets such as Church Lane and Neasden Conservation Areas and improvements to public realm and connectivity in the town centres. The environment and open spaces will be enhanced through supporting the contribution of high quality open spaces and wildlife corridors, including maintaining and enhancing existing parks and groups and tree planting and associated landscaping around the North Circular Road / A5, and others.</p>																								

Economic impacts are considered to be positive due to encouraging efficient infrastructure to support economic growth by safeguarding land for the West London Orbital (WLO) Route and associated infrastructure and reducing traffic dominance on the A5 corridor and North Circular Road. Creation of high quality pedestrian connections from Brent Cross West Thameslink station to Staples Corner will reduce traffic dominance. Any new stations delivered as part of the WLO would have lift access, which would have positive impacts on protected groups with limited mobility, such as disability, age, and pregnancy and maternity. The policy also increases employment opportunities through supporting the provision of new educational facilities, and any additional small scale retail / other uses floorspace and retaining and encouraging intensification of particular business and industrial uses at Kingsbury LSIS. In combination with other policies (e.g. BE1 – Economic Growth and Employment Opportunities for All – which seeks to secure Employment, Apprenticeship and Training Plans as part of developments of 3,000sqm or more), this could be particularly beneficial to particular under-represented protected groups (e.g. women, disabled people, BAME groups).

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. In particular, in relation to disability, directing development towards public transport corridors and safeguarding land for the WLO route is likely to have positive impacts in terms of accessibility.

Conclusion: The proposed policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the East place of Brent.

Policy BP3: North

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	+	++	+	-	0	-/+	+	+	+	0	0	+	+	?	++	+	++	++	+

Social impacts are considered to be positive. The policy supports the continued residential development in the Burnt Oak and Colindale Growth Areas, which will encourage prosperity. Additionally, the policy will secure sufficient physical and social infrastructure to support the increase in population which will promote social inclusion and help to narrow inequalities within the borough. The policy will also improve health and wellbeing through identifying opportunities for a new leisure facility incorporating swimming pool provision and improve the quality of strategic sports hall sites. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.

Environmental impacts are considered to be positive. The policy will help to enhance and maintain attractive and clean environments and to protect and enhance the historic environment by way of conserving and enhancing designated heritage assets in the area, and ensuring that development respects the predominantly suburban low rise character of the area. The policy also supports improvements to public realm, building upgrades and shop façade improvements in Colindale / The Hyde and Burnt Oak. The policy supports enhancements to open spaces and creation of new public spaces, and aims to reduce traffic dominance and enhance A5 corridor, which will improve environmental health. Although the policy seeks to reduce traffic dominance, this will not have a negative impact on those who are reliant on cars (e.g. those with a disability) as higher car parking standards will still apply in areas with low PTAL ratings. Additionally, the policy aims to reduce traffic dominance partly through the creation of new cycling links between key destinations – by offering a greater variety of choice in how residents travel between key destinations, traffic dominance may be reduced, therefore leading to a positive impact on those who are still required to drive due to limited mobility.

Economic impacts are considered to be positive. The co-location of Capitol Valley and Honeypot Lane LSIS will help to facilitate both indigenous and inward investment in the borough. Residential development within various locations at Kingsbury town centre will help to support its vitality and viability, and an increased net provision of comparison and convenience goods floorspace, directed towards the town centres will contribute towards the employment offer in the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North place of Brent.

Policy BP4 – North West																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	0	++	+	-	0	+/-	+	+	+	0	0	+	++	?	+	+	+	++	+

Social impacts are considered to be positive. Housing delivery (being able to provide everybody with the opportunity to live in a home which is suitable to their identified needs) will be increased through the provision of approximately 2600 new homes including specialist accommodation to meet identified demand, and delivery of mixed-use development on the Sainsbury's Kenton Road site. Health and

wellbeing will be enhanced through the protecting and enhancing playing pitch provision and encouraging community use of Byron Court Primary School's sports facility and improvements to the university hospital. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.

Environmental impacts are considered to be predominantly positive. The policy will result in an improved setting of and better integration of open space within the site to Northwick Park, and will result in enhanced landscape and townscape through continuing to conserve and enhance designated heritage assets and protecting where possible the established metro-land characteristics of the place. Biodiversity will be conserved and enhanced through protecting and enhancing wildlife corridors and pursuing opportunities to create a local nature reserve at Ducker Pool. Improvements to Northwick park station and implementation of cycle ways will reduce traffic.

Economic impacts are considered to be positive. The policy supports provision of enhanced or redeveloped university facilities, the creation of new convenience floorspace, and the retention and intensification of SIL Land at East Lane Business Park.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North West place of Brent.

Policy BP5 – South																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	+	++	+	-	0	+/-	+	+	+	0	+	+	+	+	+	+	+	++	+
Social impacts are predominantly positive. The policy proposes the extension of Church End Growth Area to include adjoining industrial sites to provide a mixed use neighbourhood, which will encourage prosperity and increase housing delivery. Church End town centre is also to provide a market for local communities, which will support social inclusion and community identity, and a new space within Church End Growth Area will serve as an employment, community and health hub, supporting health and wellbeing. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.																								

Environmental impacts are predominantly positive. The policy proposes the conserving and enhancing of heritage and cultural assets and their setting, in particular that of Neasden Temple and Harlesden Conservation Area. This will help to maintain an attractive and clean environment and protect and enhance historic environments and cultural assets. Environmental enhancements will reduce flood risk, and enhancements to open space and prioritising tree planting in areas of poor air quality, particularly along the North Circular Road, will promote climate change adaption.

Economic impacts are predominantly positive. The policy supports the engaging with the community of St Raphael’s Estate to develop a strategy as a potential area of change, to deliver more homes, thereby supporting resilient and inclusive economic growth. The policy also aims to protect and enhance Harlesden town centre’s retail and evening economy, including new convenience and comparison retail floorspace, supporting the local economy. Co-location of employment and residential uses at Church End LSIS, and encouragement of intensification of employment uses at Brentfield LSIS will facilitate both indigenous and inward investment within the borough. As will supporting the establishment of new Creative Quarters at Harlesden. A new 6th form entry secondary school and college will help to maximise education and skills.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South place of Brent.

Policy BP6 – South East																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	++	++	+	+	0	+	++	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	++	+
Social impacts are considered to be predominantly positive. The policy promotes the delivery of 3400 high quality new homes in South Kilburn Growth Area, with a target of 50% affordable housing including social rented for existing secure tenants of South Kilburn. This will help to ensure that everybody is provided with an opportunity to live in a home which is suitable to their identified needs. The policy also promotes the securing of infrastructure in South Kilburn, including a new community space and enhancement and protection of leisure provision and playing																								

pitches. This will increase community cohesion and health and wellbeing. Positive social impacts are also anticipated through the provision of new education, health and cultural facilities.

Environmental impacts are considered to be predominantly positive. Safeguarding land for the West London Orbital Route will help to ensure that traffic can be reduced in the future. The enhancement of cycle links and to open space will also create beneficial environmental impacts.

Economic impacts are considered to be predominantly positive. The policy proposes to protect and enhance the Queen’s Park Creative Quarter and South Kilburn Enterprise Hub, and to enhance and protect Kilburn Town Centre’s evening economy, which together will promote and protect employment opportunities.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

Conclusion: The preferred policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the South East place of Brent.

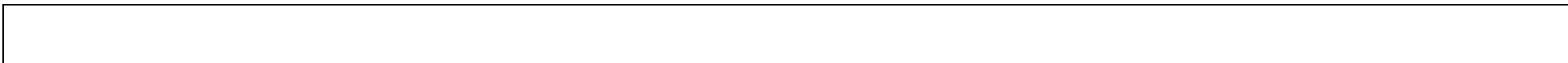
Policy: BH1 INCREASING HOUSING SUPPLY IN BRENT																								
I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	+	+	?	?	?	?	-	-	?	-	?	?	?	-	-	?	+	+	+	?	+	+	?
<p>Although not exclusively for Brent residents provision of significantly more homes in the borough will have positive impacts in relation to social inclusion, health and well-being, living in a home which needs, open space, flooding, economic growth, indigenous and inward investment, maximise population’s economic potential. For example, it will address issues of people being placed in temporary accommodation, overcrowding and accommodation which is too expensive and in some cases eliminates potential available disposable income, with the associated adverse impacts on life chances. This will serve to increase opportunities for those most vulnerable within the borough, acting to reduce any differential between those who share a protected characteristic and those who do not. More homes at more affordable prices will assist the economy by limiting wage inflation, allowing more employees to live nearer to work, support existing and new firms’ investment in the area and provide training opportunities/ apprenticeships in the building trade for local people. Wholesale changes to areas through master-planning or appropriate planning permissions should provide more opportunities for provision of more formal open space on current brownfield land covered by buildings. It should allow investment in existing open spaces</p>																								

through developer contributions, which in some cases are under-used and reduce surface water run-off which previously hasn't been controlled to greenfield run-off rates.

Impacts will be uncertain in relation to the environment, community safety, recognising Brent's diversity, the vitality and viability of town centres, bio-diversity, townscape, historic and cultural assets, water quality and resources, flora and fauna, landscape and townscape, historic environment and cultural assets, soil quality, local employment, infrastructure to support growth. The limited availability of land in Brent will however potentially impact in both positive and negative ways, with overall uncertain outcomes in relation to a number of aspects. Whilst the need to build homes will mean investment in the existing built environment, which will be positive in dealing with run-down or derelict sites including those of an historic nature, intensification of land use will result in higher plot ratios. This will increase either buildings' site coverage and/ or heights, reducing space for green infrastructure and potentially increasing perceptions of development not of a human scale and of an increased feeling of enclosure. Whilst interventions such as including on site green infrastructure might overcome some impacts, it is difficult to know whether these will be able to fully compensate for undeveloped space lost. Pressure to use land to a greater extent and the economic value of homes could displace more economically marginal uses, such as cultural assets, or business premises, etc., which might not be overcome by policies which seek to seek re-provision, or new facilities.

It is likely to have adverse impacts on reducing the effect of traffic on the environment, reducing the production of waste, air quality, reducing greenhouse gas emissions and mitigating climate change. Again whilst other policies will help to reduce the potential for adverse impacts, additional housing against a backdrop of overall population growth will probably result in these adverse impacts. Increased traffic is likely as not all development will be in areas with high public transport accessibility, construction is a significant contributor of waste even when reusing properties, homes will require energy to function, even if it is less than traditionally consumed and increased buildings will increase temperatures due to their increased thermal mass.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics compared to the wider population: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. At a general level the provision of additional homes is more likely to allow those with protected characteristics to better meet their needs, as it will provide more choice and possibly result in reductions in costs of property. This could benefit those with protected characteristics who often do not have the purchasing power of others, but will more likely rely on other policies in the plan to ensure that targeted needs, such as affordable housing, mobility housing, specialist housing and family housing are provided. For those with the protected characteristics of age, pregnancy and maternity and disability, impacts on accessibility and car parking would be considered under other policies (design policies, parking policies, and London Plan policies).



Policy: BH3 BUILD TO RENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0

The policy will have minor positive impacts in relation to social inclusion, homes to meet needs, business and inward investment. The incorporation of private rented and Built to Rent will assist to some extent in addressing social inclusion by potentially providing a better market rented product compared to that offered by some small scale landlords, and in terms of meeting needs might better address those who are unable to buy properties but able to rent. This may also serve to increase the availability of specialty housing such as those designed for disabled residents, raising them up from potentially compromised living conditions and providing them with greater power of choice. Provision of additional rented properties will allow for a more flexible workforce able to move to work opportunities quicker/ easier and thus potentially increase inward investment by businesses.

The policy will have neutral impacts compared to the provision to housing for sale on health, high quality environment, community safety, diversity, accessibility, traffic, waste, water, environmental health, townscape, historic environment, climate change, soil, open space, flood risk, employment opportunities, education and skills and infrastructure. There is unlikely to be a significant differentiation between build to rent and owner-occupation led housing on these matters.

The policy is likely to have a mix of positive, neutral and negative impacts on age, disability, pregnancy and maternity, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation. The policy could have a positive impact on disabled groups by way of potentially raising them up from compromised living conditions by providing greater power of choice.

The provision of rental properties is part of a wider attempt to increase the overall volume of dwellings built. As such it might have a positive impact on some of those with protected characteristics who are currently unable to meet their housing needs in the open market, but who have the purchasing power to attain solutions if capacity was available. For those who are unable to afford market dwellings, some affordable housing will be provided with these dwellings, but the amount of affordable dwellings and discount on rents is in many cases likely to be lower than that delivered in association with conventional housing, meaning that benefits to those who might have less ability to

have choices due to limited incomes (more likely to be the young/old, disabled, pregnant/ maternity, females, gender reassigned and race) is uncertain. Overall, it is likely to increase the amount of affordable homes delivered, however the rents on these properties are in the majority of cases likely to be higher than the affordable housing provided in conventional housing schemes.

Policy: BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT

IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	+	0	+	0	0	0	+	+	0	0	+	+	0	0	+	+	0	0	+	0	0	0	0	0

The policy will have minor positive impacts in relation to social inclusion, homes that meet needs, accessibility, traffic, air pollution, greenhouse gas emissions. The emphasis on ensuring that the dwellings have good access to public transport will provide homes that better meet the needs of those with no private transport, those who may be unable to drive due to a disability, or who require access to facilities, such as those who are physically disabled, increasing their opportunities. This will produce benefits in terms of reducing reliance on the private car and therefore associated traffic generation, air pollution and greenhouse gases, although it may result in fewer homes being provided than if there was no such emphasis on good access to public transport being a requirement. The policy, however, does still allow for some flexibility outside of the identified priority locations.

The policy will have neutral impacts on health, high quality environment, community safety, diversity, waste, water, townscape, historic environment, soil, open space, employment opportunities, education and skills and infrastructure. Positive impacts are expected in relation to climate change adaption, flood risk, and biodiversity. Whilst areas that benefit from higher levels of public transport accessibility are more likely to have been developed more densely than lower suburban areas, they also are usually more historic in their character as they have been along main travel corridors. Increased development in these areas could potentially impact on character whilst giving greater likelihood of the character of lower PTAL areas remaining unchanged. In relation to impacts on other objectives there is unlikely to be significant differentiation between homes in PTAL 3-6 and PTAL 0-2 on these matters. However, some positive impacts are anticipated due to possible environmental impacts from the Urban Greening Factor.

There will be a positive impact on the following groups: age, disability, pregnancy and maternity, sex, gender reassignment and race, as the young / old, disabled, pregnant and on maternity leave, female, gender reassigned and black and minority ethnic groups are more likely to be economically disadvantaged and therefore more reliant on having facilities close by, or having access to alternatives such as good public transport that provides the opportunity to greater access to facilities. Many of Brent’s larger, lower density homes are occupied by extended families principally formed from BME groups who need larger homes to meet their needs. The policy does not

negatively impact any particular groups by focusing small sites development in areas which will already tend to be well-connected and it still allows for some flexibility outside of the identified priority locations.

There will be a mixed / unclear impact on all other protected groups (religion and belief, sexual orientation and marriage and civil partnership). This is because the policy could reduce the potential delivery of homes on small sites due to small sites being focused in locations with genuine reasonable public transport alternatives. This could be to the detriment of those in housing need.

Policy BE2: Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS)

I/A Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
	?	?	+	?	+	0	0	+	0	?	-	?	+	0	?	0	+	0	0	+	?	+	0	+

Impacts are predicted to be positive or uncertain in relation to social objectives. The policy has the potential to secure new industrial floorspace which could in turn increase employment and prosperity, with associated benefits to health and well-being. In the short to medium term businesses may be displaced resulting in a loss of employment, making potential impacts uncertain. In terms of housing delivery this option will have significant positive impacts as it will result in additional housing. At the moment the majority of SIL and LSIS in the borough are in a poor environmental quality. Redevelopment will improve the quality of the environment but the benefits may be negated by the potential for noise concerns from co-locating residential and industrial uses. Introducing residential into industrial areas will increase footfall and overlooking on an evening which can increase feelings of safety and reduce crime.

Mixed environmental impacts are predicted. Co-location can reduce the need to travel to work which can have positive impacts. Each SIL and LSIS has been scored against I/A criteria to assess its sustainability for housing. Sites identified as suitable for co-location have good public transport accessibility levels, or will benefit from future planned investment in transport infrastructure. Development in these locations will be less reliant on private vehicles and place less pressure on the transport network.

By protecting some areas of SIL and LSIS for industrial uses, this allows the potential for energy from waste and the circular economy. Increasing housing and employment will generate additional waste, making overall predicted impacts neutral.

Some of Brent's SIL and LSIS sites are adjacent the Grand Union Canal. Through redevelopment there is potential to enhance the waterfront and improve water quality and biodiversity through planting and green sustainable urban drainage systems. Therefore, potential positive impacts are uncertain in relation to criteria EN3.

Industrial uses can generate noise and air pollution. Locating housing next to industrial uses could have negative impacts on amenity and there will be a need for this to be carefully managed. Protecting some areas of SIL and LSIS for purely industrial uses allows uses which could have the most detrimental impacts to locate elsewhere.

Redevelopment could result in enhancements to landscape setting through the creation of a higher quality environment. There are a limited number of heritage assets within Brent's industrial areas. Other policies will protect these assets commensurate with their significance therefore impacts should be neutral.

Increased development will increase energy consumption. Intensification of uses does create the scope for district heating networks and modern development is required to meet higher sustainability standards, so there may be positive impacts associated with the redevelopment of older less efficient buildings.

This has potential to introduce sensitive residential development into areas of flood risk. However, a sites suitability for co-location has been informed by an assessment of potential flood risk, making overall impacts neutral. Modern development incorporating Sustainable Urban Drained Systems could help increase permeability and reduce flood risk.

This policy promotes the efficient use of brown field land, which could have positive impacts in reducing the need to develop on green field and open space. Redevelopment would also be subject to remediation of any contamination.

Economic impacts are anticipated to be predominantly positive. Housing has higher values and therefore can help subsidise the creation of new employment floorspace. This in turn can generate job opportunities. This policy balances facilitating investment in SIL and LSIS, whilst protecting some employment sites for businesses which are not suitable for co-location. During construction there is potential that some businesses will be displaced which could have negative impacts on employment in the short to medium term, but the policy seeks to mitigate this by ensuring there are employment sites within the borough displaced businesses could relocate to. Co-location of employment and housing will have positive benefits in reducing commuting and improving access to employment.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, race, sex and sexual orientation. The purpose of the

policy is to ensure land is fully utilised both for employment and housing. This should benefit all groups. Creating mixed neighbourhoods can create sustainable places and reduce travelling times. However, the policy could have a positive impact on the protected characteristics of sex, pregnancy and maternity and disability as it may have particular benefits to those with caring responsibilities or those with limited mobility.

Policy BE3: Local Employment Sites and Work-Live																								
IIA Objective Scoring	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
		+	+	++	+	+	+	+	+	-	+	0	?	+	0	0	0	+	+	0	+	+	+	0
<p>Impacts are predicted to be positive in relation to social objectives. Protecting employment sites in industrial use across the borough will ensure local employment opportunities. This can help reduce inequalities, and in turn help improve health and well-being. This policy option will result in increased housing, including affordable housing. Encouraging investment through new development can help improve the quality of an area. Mixed-use development creates footfall and overlooking in areas throughout the day and evening. This can help improve feelings of safety and reduce crime. SMEs are an important part of an areas character. Protecting and retaining these businesses can help foster a sense of place and pride. Where local employment sites are located in town centres intensification of use will help to increase the population of the centre and help to support its vitality and viability.</p> <p>Impacts against environmental impacts are mixed but overall predicted to be positive. Protecting local employment sites in industrial use ensures local employment opportunities are available, and can reduce the need to travel. Although increased intensification of use will increase the production of waste. Therefore, impacts are likely to be negative in relation to criteria E2.</p> <p>There is a risk in locating sensitive uses such as residential next to industrial employment of impacts on amenity, particularly from noise. Given that space will be designed to modern sound insulation standards and be air quality neutral impacts on environmental health can be mitigated. Impacts overall are therefore likely to be neutral.</p> <p>Modern development will enhance the quality of the public realm, townscape and will integrate sustainable urban drainage systems which can help to improve water quality. Through redevelopment a net increase in biodiversity and green infrastructure is sought, but whether this constitutes a benefit will be dependent on the existing site and the level of planting and biodiversity already present. Impacts on biodiversity are therefore dependant on the nature of the site. Where a local employment site contains a heritage asset</p>																								

this will be protected as appropriate by policies elsewhere in the plan, so the impacts are likely to be neutral. Whilst increased intensity of use can increase energy consumption, modern buildings are designed to higher sustainability standards. Meaning overall impacts are likely to be neutral.

Allowing more efficient use of land can help protect open space and greenfield sites from development pressure.

Impacts against economic impacts are predicted to be predominantly positive. In the short to medium term businesses may be displaced during development. Longer term this policy will have positive impacts by securing an increase in the amount of affordable workspace in the B use class (with makerspace prioritised to meet demand) as part of mixed-use developments which will help support business start-ups and create job opportunities. Work-Live development can also promote flexible working, which could be of particular benefit to those with caring responsibilities or disabled people with less mobility. This policy approach will help to attract investment to local employment sites. Mixed-use development and Work-Live development has the potential to reduce the need to travel, but only if those in the local community can benefit from employment opportunities.

It is considered that this policy will have a neutral impact on people who have the following protected characteristics: gender reassignment, marriage and civil partnership, age, religion and belief, pregnancy and maternity, sexual orientation. The policy could have particular positive impacts on the protected characteristics of sex, race and disability, as women and BAME groups have higher levels of unemployment and the policy will result in the creation and retention of local employment opportunities. Additionally, the policy could benefit disabled people with less mobility and those with caring responsibilities.

9. Submission Stage Site Allocation Assessments

9.1. A number of changes have been made to the proposed site allocations since the Publication Stage of consultation. An outline of these changes is below.

Potential Changes to Site Allocation Assessments due to Main Modifications

9.2 A number of main and minor modifications are proposed to the Local Plan following the publication stage of consultation. Noted below are where these proposed modifications have resulted in a change to the wording of the assessment of the site and / or its associated IIA. The respective updated site assessments can be found later in this chapter.

Site Name	Notes	Indicative Housing Capacity (Publication Stage)	Indicative Housing Capacity (Submission Stage)	Potential Impacts
BCSA4	Change in housing capacity	Up to 700	Up to 500	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BCSA6	Change in housing capacity	1000	830	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BCSA7	Change in housing capacity	400	475	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BCSA7	Clarification that development must re-provide TfL ancillary accommodation	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BCSA9	Change in housing capacity	1200	1262	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BCSA9	Change in terminology from 'business' to 'industrial'	No change	No change	No overall change in gain or loss of employment space so no change to ratings

BCSA17	Deletion of Site Allocation	60	N/A	Site Allocation removed due to being SIL
BEGA1	Clarification that site comprises LSIS rather than SIL and LSIS	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BEGA1	Change in terminology from 'employment' to 'industrial'	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BEGA2	Change in terminology from 'employment' to 'industrial'	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BESA2	Clarification regarding re-provision of floorspace	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BNSA2	Clarification regarding the PTAL rating of the site	No change	No change	No change; still a neutral rating
BNSA2	Change in terminology from 'employment' to 'industrial'	No change	No change	No overall change in gain or loss of employment space so no change to ratings (S3A)
BSESA5	Change in housing capacity	120 (gross)	121 (gross) (loss of 171)	Minor negative due to loss of 171 homes (net loss of 50) (S3A)
BSESA8	Change in housing capacity	202 (gross)	250 (gross) (loss of 154)	Minor positive due to net gain of fewer than 100 homes (net gain of 96) (S3A)
BSESA11	Change in housing capacity	10	20	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSESA12	Change in housing capacity	Unknown	-40	Minor negative due to loss of 40 dwellings (S3A)
BSESA22	Change in housing capacity	20	42	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSESA25	Change in housing capacity	50	70	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSESA34	Change in housing capacity	Unknown	20	Site still provides fewer than 100 homes so there is still a minor positive impact (S3A)
BSSA1	Change in housing capacity	380	414	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSSA4	Change in housing capacity	200	300	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSSA6	Change in housing capacity	540	569	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)

BSSA6	Change from “modern replacement employment floorspace” to “affordable workspace will be sought”	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BSSA13	Change in housing capacity	15	26	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSWSA1	Clarification regarding re-provision of floorspace	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BSWSA5	Change in housing capacity	590	490	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSWSA6	Change in housing capacity	135	147	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSWSA6	Clarification that re-provision of industrial floorspace will be sought rather than flexible / affordable workspace	No change	No change	No overall change in gain or loss of employment space so no change to ratings
BSWSA7	Change in housing capacity	2900	2303	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)
BSWSA12	Change in housing capacity	24	22	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSWSA15	Change in housing capacity	28	36	Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A)
BSWSA16	Change in housing capacity	80	120	Change from minor positive to significant positive, as now has an indicative capacity of over 100 homes (S3A)
BSWSA17	Change in housing capacity	150	170	Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A)

Table 9: Potential Changes to Site Allocation Assessments due to Main Modifications

Proposed Change to Methodology for Assessing Flood Risk

9.3 As a statutory consultee, the Environment Agency was consulted at Submission and Publication stage. Comments were received back from the Environment Agency in relation to the methodology of assessing the flood risk. In line with national policy and the sequential test, a site wholly in Flood Zone 1 is to be prioritised for allocation over a site partially in Flood Zone 2. For this reason at submission stage it is proposed to amend the methodology for EN12a and EN12b in line with the EA's comments, and for consistency, for EN12c (surface water) to be amended to allow for sites at no risk of surface water flooding to be considered "minor positive" rather than "neutral". The updated methodology is below.

	Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- 0	Unknown Effects	Minor Negative -	Significant Negative --
Publication Stage methodology	EN12a: Flood Risk From Rivers.	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
Submission Stage methodology	EN12a: Flood Risk From Rivers.	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
Publication Stage methodology	EN12b: Flood Risk from Ground Water.	NA	NA	All other sites	NA	Majority (>50%) within 'moderate' groundwater flood risk area <u>or</u> smaller proportion (1-50%) within	Majority (>50%) within 'high' or 'very high' groundwater flood risk area

						'high' or 'very high' groundwater flood risk area	
Submission Stage methodology	EN12b: Flood Risk from Ground Water.	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
Publication Stage methodology	EN12c: Flood Risk from Surface Water.	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
Publication Stage methodology	EN12c: Flood Risk from Surface Water.	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

Table 10: Changes to Methodology for Assessing Flood Risk of Site Allocations

9.4 Due to the change in methodology above it was necessary to re-assess the site allocations. A schedule of proposed changes is below. However, some of the ratings may also have changed due to clarification of site boundaries resulting in part of the site either no longer being in an area of flood risk or now being in an area of flood risk.

Proposed Changes to Flood Risk Ratings of Site Allocations

Site Allocation Reference	Publication Stage EN12a rating (river)	Submission Stage EN12a rating (river)	Publication Stage EN12b rating (groundwater)	Submission Stage EN12b rating (groundwater)	Publication Stage EN12c rating (surface water)	Submission Stage EN12c rating (surface water)
BCSA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA2	Neutral	Neutral	Neutral	Minor Positive	Major Negative	Minor Negative
BCSA3	Major Negative	Major Negative	Neutral	Minor Positive	Major Negative	Major Negative
BCSA4	Neutral	Neutral	Neutral	Minor Positive	Neutral	Minor Negative
BCSA5	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA6	Major Negative	Minor Negative	Neutral	Minor Positive	Major Negative	Minor Negative
BCSA7	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA8	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA9	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA10	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BCSA11	Minor Negative	Minor Negative	Neutral	Minor Positive	Major Negative	Major Negative
BCSA12	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA13	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA15	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA16	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA18	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BCSA19	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BEGA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BEGA2	Neutral	Neutral	Neutral	Neutral	Minor Negative	Minor Negative
BESA1	Minor Negative	Minor Negative	Neutral	Minor Negative	Neutral	Minor Positive
BESA2	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BESA3	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Positive
BNSA1	Neutral	Minor Positive	Minor Negative	Minor Positive	Minor Negative	Minor Negative
BNSA2	Neutral	Minor Positive	Major Negative	Minor Positive	Minor Negative	Minor Negative
BNSA3	Neutral	Neutral	Minor Negative	Minor Positive	Minor Negative	Minor Negative

BNSA4	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA5	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA6	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA7	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA8	Neutral	Minor Positive	Neutral	Minor Positive	Major Negative	Major Negative
BNWSA1	Neutral	Minor Positive	Minor Negative	Minor Positive	Neutral	Minor Negative
BNWGA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA2	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA3	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA4	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA5	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BSSA6	Major Negative	Major Negative	Neutral	Minor Negative	Major Negative	Minor Negative
BSSA7	Major Negative	Major Negative	Neutral	Minor Negative	Minor Negative	Minor Negative
BSSA8	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA9	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA10	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BSSA11	Neutral	Minor Positive	Neutral	Minor Negative	Minor Negative	Minor Negative
BSSA12	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Positive
BSSA13	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA15	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA16	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA17	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA18	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA19	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA2	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA3	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA4	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA5	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA6	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA7	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA8	Neutral	Minor Positive	Neutral	Minor Positive	Major Negative	Minor Negative

BSWSA8	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA9	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSWSA10	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSWSA11	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA12	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BSWSA13	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSWSA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA15	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Negative
BSWSA16	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Negative
BSWSA17	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative

Table 11: Changes to Flood Risk Ratings of Site Allocations

Updated Site Allocation Assessments (Publication 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	+	+	+	-
Comments	<p>The site is within a London Strategic Area for Regeneration and should contribute a significant uplift in residential units of approximately 940. The site is also within an area associated with high levels of crime and should therefore benefit from redevelopment. The site is well provisioned with infrastructure, including healthcare, schools, and parks and sporting facilities.</p>								<p>With a high PTAL the site benefits from the good public transport links afforded due to proximity to Wembley Park station. This should facilitate the delivery of a car free development, reducing associated traffic and air pollution in the area. The site is currently not in-keeping with local character and has large parking facilities, creating a poor environment. The site would therefore benefit from redevelopment in order to bring the design more in line with local character and reduce parking provision in order to decrease car dependency.</p>											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Stadium Retail Park and Fountain Studios (BCSA2)	-	+	++	++	++	++	++	0	+	0	0	--	0	?	0	0	+	0	+	-
Comments	The site is not within a London Strategic Area for Regeneration. The site is within an area associated with high levels of crime and therefore will benefit from redevelopment. The site is well located and has good access to a range of essential infrastructure such as healthcare, schools, and sporting facilities.										With a high PTAL of 5-6a, the site benefits from its close proximity to Wembley Park station and should therefore aim to be car free, reducing associated traffic and pollution. The site has fairly significant surface water flooding concerns which should be addressed in any proposals and should be mitigated effectively with the incorporation of SUDS and green infrastructure.									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Brook Avenue (BCSA3)	0	+	++	++	++	++	++	0	+	0	+	--	0	?	0	0	0	--	+	--
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is within an area associated with average crime rates and should benefit from redevelopment in this respect. The site is within close proximity to Wembley town centre which reflects the sites good access to a wide range of facilities, including employment, healthcare and sporting facilities. The site has potential for a significant number of residential dwellings.</p>								<p>The site has a high PTAL rating (predominantly 4-5) being in close proximity to Wembley Park Station suggesting developments should aim to be car free. This should serve to reduce traffic and associated air pollution through reducing car dependency. The site backs onto the Wealdstone Brook and presents an opportunity to enhance the watercourse through redevelopment, ensuring proposals are compliant with the waterside development policy. The site has considerable flooding concerns, both fluvial and surface water, and will benefit from the incorporation of SUDS and soft landscaping to increase permeability and biodiversity.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. Development should enhance the setting of the adjacent watercourse by contributing to naturalisation, and mitigate the current concern over fluvial flooding. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
Fifth Way/Euro Car Parts (BCSA4)	-	+	++	++	0	++	++	0	+	0	+	--	0	?	0	0	+	0	+	-
Comments	<p>The site is not within a London Strategic Area for Regeneration nor within an area which experiences particularly high rates of crime. Being within close proximity to Wembley town centre the site has good access to a range of</p>								<p>The site has a good PTAL of 3 and 4 and should seek to minimise parking facilities in order to reduce driving tendencies, decreasing traffic and associated air pollution. The Wealdstone Brook runs along the northern edge of the site and is designated as a Grade II Site of Importance for Nature Conservation (SINC). Therefore, a</p>											

	facilities, including healthcare, schooling, and sporting facilities.	reasonable buffer should be provided in order to reduce any potential negative impacts of flora and fauna. This also represents an opportunity to enhance the watercourse and where possible increase green infrastructure and its accessibility to the public.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This development can contribute to enhancing the watercourse through naturalisation. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	
Olympic Office Centre (Network Homes) (BCSA5)		
Comments	The site is not within a London Strategic Area for Regeneration and should provide the area with a potential housing uplift of 253 units. The area also experiences high levels of crime and will therefore benefit significantly from redevelopment. The site is within Wembley town centre and therefore has good access to facilities, including schooling which only scored negatively because the nearest primary school was slightly further than 500m away.	The site has a good PTAL level of 5, forecast to rise to 6a by 2031 which should allow for car free development, reducing associated traffic and air pollution. The site has very minor surface water flooding concerns which should be mitigated against preventing further problems.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other	

	necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Watkin Road (BCSA6)	-	+	++	++	0	++	++	0	+	0	+	--	0	?	0	0	+	-	+	-
Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area associated with high crime rates and should benefit from redevelopment in this respect. The site is within close proximity to Wembley town centre which reflects the sites good access to a wide range of facilities, including healthcare, schools, and sports facilities.							The site has a PTAL of 4 which should facilitate car free development which will reduce any associated traffic and air pollution. The site backs onto the Wealdstone Brook which itself is a Grade II Site of Importance for Nature Conservation. This designation should not be undermined by redevelopment, with any proposals ensuring a sufficient buffer in accordance with the waterside development policy. Proposals should also seek to enhance the watercourse and its accessibility by the public. The site currently suffers significant flooding, with both fluvial and surface water which should be considered in any proposals, using the incorporation of SUDS and soft landscaping for mitigation purposes.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This sustainable development can be centred around enhancement to the adjacent watercourse through naturalisation, in the process mitigating the current concern over fluvial flooding. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Wembley Park Station (BCSA7)	0	+	++	++	++	++	++	0	+	0	0	--	0	?	0	0	+	+	+	-


Comments	<p>The site is within 100 metres of a London Strategic Area for Regeneration and should provide the area with an uplift in housing of approximately 300 dwellings. The site is also within an area associated with high levels of crime and redevelopment could therefore help improve feelings of safety. The site is adjacent to Wembley town centre and therefore has access to a wide range of essential facilities including healthcare, schools, and sporting facilities.</p> <p>Development will include the re-provision of TFL ancillary accommodation.</p>	<p>The site has a good PTAL of 4 and 5 which is set to increase to 5 and 6a come 2031 which should justify and promote a car free development, reducing associated traffic and air pollution. There are minor surface water flooding concerns on site which will be easily remedied through mitigation techniques such as the incorporation of SUDS and soft landscaping. The site currently consists of large parking facilities which create a poor environment and would benefit from redevelopment.</p>																																					
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment near a London Strategic Regeneration Area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																																						
Wembley Retail Park (BCSA8)	<table border="1"> <tr> <td>-</td><td>+</td><td>++</td><td>++</td><td>0</td><td>++</td><td>-</td><td>0</td><td>+</td><td>0</td><td>0</td><td>--</td><td>0</td><td>?</td><td>0</td><td>0</td><td>+</td><td>+</td><td>+</td><td>-</td> </tr> </table>																			-	+	++	++	0	++	-	0	+	0	0	--	0	?	0	0	+	+	+	-
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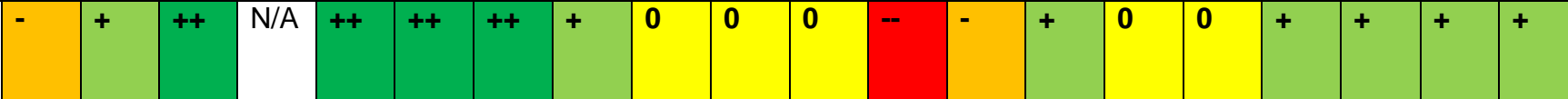
Comments	The site is not within a London Strategic Area for Regeneration, however, it is within an area associated with average crime rates and should benefit from redevelopment in this respect. The site is within close proximity to Wembley town centre which reflects the sites good access to a wide range of facilities, including employment, healthcare and sporting facilities. The site has potential for a significant number of residential dwellings.	The site has a PTAL of 3-5 which should facilitate car free development which will reduce any associated traffic and air pollution. The site currently suffers from a small amount of surface water flooding, which should be considered in any proposals, using the incorporation of SUDS and soft landscaping for mitigation purposes. A large part of the current site consists of parking, which creates a poor environment and would benefit from redevelopment.																				
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																					
First Way (BCSA9)	<table border="1" data-bbox="474 898 2201 991"> <tr> <td>-</td><td>-</td><td>++</td><td>++</td><td>0</td><td>+</td><td>++</td><td>+</td><td>-</td><td>0</td><td>0</td><td>--</td><td>--</td><td>?</td><td>0</td><td>0</td><td>+</td><td>+</td><td>+</td><td>-</td> </tr> </table> <p data-bbox="474 991 1160 1396">The site is not within a London Strategic Area for Regeneration and is within an area subject to average levels of crime. The site is within 800m of Wembley Town Centre and within the Wembley Growth Area, meaning good levels of access to essential infrastructure including schools and sporting facilities. However, the site has poor access to healthcare facilities, being more than 800m from the nearest healthcare facility. The site has potential for</p> <p data-bbox="1160 991 2201 1396">The site has a low PTAL rating though stands to benefit from better connections to the high levels of surrounding development, and is within close walking distance to two railway stations. The site is within an Air Quality Management Area and should aim to be air quality positive due to being in the Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets. The site was formerly Strategic Industrial Land and maximum re-provision of industrial uses at ground level should be undertaken as part of development.</p>		-	-	++	++	0	+	++	+	-	0	0	--	--	?	0	0	+	+	+	-
-	-	++	++	0	+	++	+	-	0	0	--	--	?	0	0	+	+	+	-			

	significant residential development of 1200 dwellings.	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of a significant amount of housing within close proximity to a town centre, with good access to essential infrastructure facilities. Mixed effects are predicted against environmental criteria. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The impermeable nature of the site currently does not provide good east-west links to the stadium, however, there is an opportunity to strengthen these links by creating new streets and pedestrian paths. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																		
York House (BCSA10)	-	+	++	n/a	++	++	++	+	++	0	0	--	0	+	0	0	+	+	+	+
	The site is not within a London Strategic Area for Regeneration but is within an area subject to high of crime. The site is within Wembley Town Centre, reflecting its high levels of access to essential infrastructure including healthcare, schools and sporting facilities. The site is allocated for use as a primary school and office space.				The site benefits from a high PTAL rating of 5-6a, which should facilitate car free development, reducing car dependence and its associated traffic and air pollution. A small proportion of the site (1-50%) is within a 1 in 100-year surface water flood risk area which will need to be mitigated accordingly.															
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of extra primary school facilities, which are required due to the expected population growth in the borough. The site contains a large carpark which is surplus to requirements. Mixed effects are predicted against environmental criteria. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. A small proportion of the site is within a 1 in 100-year surface water flood risk																			

	area therefore this will need to be investigated and addressed accordingly. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.																			
College of North West London, Wembley (BCSA11)	-	+	++	++	++	++	++	0	++	0	+	--	0	+	-	0	+	-	+	--
	The site is not within a London Strategic Area for Regeneration but is within an area subject to high of crime. The site is within Wembley Park Town Centre, reflecting its high levels of access to essential infrastructure including healthcare, schools and sporting facilities. The site has potential for mixed-use residential-led development in the region of 155 dwellings.									The site benefits from immediate proximity to Wembley Park Station and has a high future PTAL rating of 6a. This should facilitate high density, car free development, reducing car dependence and its associated traffic and air pollution. The site is adjacent to the Wealdstone Brook and features a number of mature trees, and therefore represents an opportunity to enhance the watercourse by increasing its natural amenity to biodiversity and its accessibility for public enjoyment. The site falls almost entirely within Flood Zones 2 and 3 and a Flood Risk Assessment will be required as part of any development coming forward.										
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment near a London Strategic Regeneration Area associated with high levels of crime. Mixed effects are predicted against environmental criteria. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This sustainable development can be centred around enhancements to the adjacent watercourse through naturalisation, although flood risks will need to be investigated and mitigated accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
	-	-	++	++	0	+	++	0	-	0	0	--	--	?	0	0	+	+	+	-

Land to South of South Way (BCSA12)	<p>The site is not within a London Strategic Area for Regeneration and is within an area of average crime levels. The site is within 800m of Wembley Town Centre and is within the Wembley Growth Area, meaning good levels of access to essential infrastructure including schools and sporting facilities. However, the site has poor access to healthcare facilities, being more than 800m from the nearest healthcare facility. The site has potential for residential-led mixed-use development encompassing 500 dwellings and business premises.</p>		<p>The site has a low PTAL rating though stands to benefit from better connections to the high levels of surrounding development, and is within close walking distance to two railway stations. The site is within an Air Quality Management Area and should aim to be air quality positive due to being in the Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets, however, it is adjacent to the SINC Grade I Chiltern Line and a wildlife corridor. The site was formerly Strategic Industrial Land and maximum re-provision of business uses at ground level should be undertaken as part of development. A small proportion of the site (1-50%) is within a 1 in 100-year surface water flood risk area which will need to be mitigated accordingly.</p>																	
<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of a significant amount of housing within close proximity to a town centre, with good access to essential infrastructure facilities. Mixed effects are predicted against environmental criteria. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The location of the site next to a the SINC Grade I Chiltern Line and wildlife corridor means that development must take into consideration a positive contribution to biodiversity, improve access to nature and its recreational function, which are important contributing factors to health and wellbeing. Flood risks will need to be investigated and mitigated accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																				
Former Malcolm House Site (BCSA13)	-	+	++	++	++	++	-	0	+	0	0	--	0	?	0	0	+	+	+	+

Comments	The site is not within a London Strategic Area for Regeneration but it is associated with high levels of crime. The site should provide a significant uplift in housing as well as additional floorspace for other purposes. The site is well located so as to be served by Wembley Park Town Centre and local employment sites, with healthcare within walking distance. The site is not within close proximity to a secondary school and therefore scored negatively against schooling.	The site has a strong PTAL of 5 being within close proximity to Wembley Park Station which should facilitate the implementation of a car free development, reducing associated traffic and air pollution, improving air quality for which the site scored negatively.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of schools, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.	
St Joseph's Social Club, Empire Way (BCSA14)		
Comments	The site is not within a London Strategic Area for Regeneration but it is associated with high levels of crime. The site should provide a significant uplift in housing. The site is well located so as to be served by Wembley Town Centres and local employment sites, with healthcare and schooling within walking distance. Redevelopment of this site will incur the loss of a community centre. It is	The site has a strong PTAL of 5 being within close proximity to Wembley Park Station which should facilitate the implementation of a car free development, reducing associated traffic and air pollution, improving air quality for which the site scored negatively.

	therefore important to retain any D1 floorspace, with redevelopment ensuring there is no net loss.	
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.	
Site W10 Wembley Masterplan (BCSA15)		<p>The site is not within a London Strategic Area for Regeneration but it is associated with high levels of crime. The site is well located so as to be served by Wembley Town Centres and local employment sites, with healthcare and schooling within walking distance. Redevelopment of this site should consist of retail at ground floor and B1 office or D2 entertainment at upper floors.</p> <p>The site has a low PTAL rating though stands to benefit from better connections to the high levels of surrounding development, and is within close walking distance to two railway stations. The site is within an Air Quality Management Area and should aim to be air quality positive due to being in the Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of employment space, with Brent being a “provide capacity” borough, and the positive social impacts which are associated with this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is</p>

	within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.																			
Site NW04 Wembley Masterplan (BCSA16)	-	+	++	N/A	++	++	-	+	+	0	0	--	0	+	0	0	0	+	+	-
	The site is not within a London Strategic Area for Regeneration but is within an area of high crime levels. The site is within Wembley Town Centre and has good levels of access to essential infrastructure, including healthcare facilities and sporting facilities. The site has poor access to schools, however, the site is allocated for employment use of the consisting of A1-A5, D1, B1/C1/D2 use classes.										The site benefits from a high PTAL rating of 5, which should facilitate car free development, reducing car dependence and its associated traffic and air pollution. The site is within an Air Quality Management Area and should aim to be air quality positive due to being in the Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.									
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of employment space, with Brent being a “provide capacity” borough, and the positive social impacts which are associated with this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.																			
Site W12 Wembley Park Boulevard, Wembley (BCSA18)	-	+	++	N/A	++	++	++	0	0	0	0	--	-	+	0	0	0	+	+	-

Comments	This site is not within a London Strategic Area for Regeneration, but is within an area which experiences high levels of crime. The site is within Wembley Town Centre, and benefits from close proximity to key services including schooling, healthcare and sporting facilities. The site, however, is allocated for employment uses consisting of A1-A4/B1/D1 and D2 uses.	The site has a medium PTAL rating. The site is within an Air Quality Management Area and should aim to be air quality positive. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.																				
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of employment space, with Brent being a “provide capacity” borough, and the positive social impacts which are associated with this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.																					
Wembley Park Station, Police Station and Adjacent Land Bridge Road (BCSA19)	<table border="1" style="width:100%; text-align:center; border-collapse: collapse;"> <tr> <td style="width:5%; background-color: #90EE90;">+</td> <td style="width:5%; background-color: #90EE90;">+</td> <td style="width:5%; background-color: #008000;">++</td> <td style="width:5%; background-color: #90EE90;">+</td> <td style="width:5%; background-color: #008000;">++</td> <td style="width:5%; background-color: #008000;">++</td> <td style="width:5%; background-color: #008000;">++</td> <td style="width:5%; background-color: #00B0F0;">?</td> <td style="width:5%; background-color: #008000;">++</td> <td style="width:5%; background-color: #FFFF00;">0</td> <td style="width:5%; background-color: #FFFF00;">0</td> <td style="width:5%; background-color: #FF0000;">--</td> <td style="width:5%; background-color: #FFFF00;">0</td> <td style="width:5%; background-color: #90EE90;">+</td> <td style="width:5%; background-color: #FFFF00;">0</td> <td style="width:5%; background-color: #FFFF00;">0</td> <td style="width:5%; background-color: #FFFF00;">0</td> <td style="width:5%; background-color: #90EE90;">+</td> <td style="width:5%; background-color: #90EE90;">+</td> <td style="width:5%; background-color: #90EE90;">+</td> </tr> </table>		+	+	++	+	++	++	++	?	++	0	0	--	0	+	0	0	0	+	+	+
+	+	++	+	++	++	++	?	++	0	0	--	0	+	0	0	0	+	+	+			
Comments	The site is within a London Strategic Area for Regeneration, and is within an area which experiences high levels of crime. The site is adjacent to Wembley Park Town Centre, and benefits from close proximity to schooling, open space, and healthcare facilities. The site is allocated for residential development of approximately 60 dwellings, plus re-provision of the police station.	The site has a very high PTAL rating, which should facilitate car free residential development, reducing car dependence and its associated traffic and air pollution. The site is within an AQMA and should aim to be air quality positive due to being in the Wembley Growth Area. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.																				

Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of approximately 60 new dwellings, plus re-provision of the police station, within a town centre and with good access to essential infrastructure facilities. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the site is well suited to being allocated for this use, and negative impacts can be mitigated and wider sustainability benefits achieved.</p>	

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	+	+	+	-
Comments	<p>The site is within a London Strategic Area for Regeneration. A significant part of the site comprises Locally Significant Industrial Sites. This being said, due to the size of the site and its potential for mixed development, it is possible it can accommodate a significant amount of residential development. The site is well located and has good access to key facilities including healthcare, schooling, and sporting facilities. Improvements to cycling and pedestrian links across the A5 and North Circular Road could particularly positively impact disabled people and those pregnant or on maternity.</p> <p>Regeneration will include the re-provision of industrial opportunities with plans to make the site more relevant to current workspace needs.</p>								<p>The site is well located, with PTALs ranging from 3-6a being within close proximity to Neasden Station with possibilities to benefit from the introduction of an additional station on the West London Orbital line. This will allow for the majority of developments within the site to be car free, reducing associated traffic and air pollution. This will be of particular importance on this site due to the potential for a significant uplift in dwellings. Being of mixed use, this site is set to include employment opportunities, helping further reduce the requirement of residents to commute long distances, relieving public transport and road networks. The site has some surface water flooding concerns which should be mitigated against using a sequential approach to development, ensuring flooding potential does not increase unacceptably.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration which is associated with high crime rates. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an</p>																			

	AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Staples Corner SIL (BEGA2)	0	+	++	+	++	-	++	0	-	0	+	--	--	?	0	0	+	0	0	-
Comments	<p>The site is within 100 metres of a London Strategic Area for Regeneration. The site is also within an area associated with high crime rates and would therefore benefit from redevelopment. The site is not close to a Brent town centre, however, the site is on the edge of the borough and next to Brent Cross shopping centre and should therefore be serviced by this. The same can be said of schools as it is likely that residents in this area will make use of schools in the neighbouring borough of Barnet. Regeneration would be required to provide industrial floorspace at a higher density. Residential development could help subsidise the creation of new industrial floorspace adapted for future needs.</p>										<p>The site has a low PTAL of 2 and 3 which is not set to change to 2031, however, this has not taken into consideration the potential for a West London Orbital link in the area. The low PTAL will likely serve to increase car dependence, increasing associated traffic and air pollution. As the site is transformational and of significant size, in addition to the neighbouring Brent Cross Opportunity Area of Barnet, it may be possible to improve transport infrastructure with additional buses etc. This is particularly important due to the size of the site, the sites designation as a Strategic Industrial Location, the traffic which already exists on the associated road networks and the location of the site within an Air Quality Management Area. The site also provides the opportunity to better enhance the Brent reservoir and increase its integration within the wider public consciousness.</p>									
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area which is associated with high levels of crime. The site is not within close proximity to a Town Centre area, however, it is located near the borough boundary and will be served by Brent Cross shopping centre in Barnet. Given the scale of the site there is an opportunity for new services and social infrastructure to be provided as part of any development. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities.</p>																			

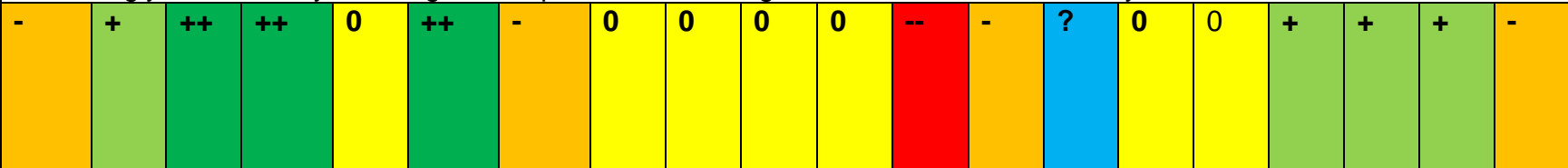
	New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This sustainable development can be centred around integration with the reservoir with redevelopment looking to enhance this asset. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Coombe Road (BESA1)	++	+	++	++	++	++	+	0	0	0	+	--	-	?	0	0	+	-	-	+
Comments	The site is within a London Strategic Area for Regeneration with a capacity of 194 dwellings. The site is also associated with high levels of crime and will therefore benefit from redevelopment. The site has good access to a range of essential infrastructure, including healthcare, schooling and, sports facilities.								This site currently has a PTAL of 3 which is expected to increase to a minimum of 4 with the introduction of the West London Orbital. This site is therefore appropriate for car free development. This site is also adjacent to the River Brent and the Brent Canal Feeder and therefore poses the opportunity to enhance the watercourses amenity for both residents and biodiversity. Due to this close proximity to watercourses, the site has some fluvial flooding concerns which proposals should take into consideration.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This should mitigate current concern over fluvial flooding and contribute to naturalisation of the adjoining watercourses. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Edgware Road Bus Depot (BESA2)	0	+	++	++	0	++	+	0	0	0	0	--	-	?	0	0	+	+	+	-
Comments	<p>The site is close to a London Strategic Area for Regeneration. The site is well provided for in terms of infrastructure, including healthcare, schools, sporting facilities and open space.</p> <p>The site is a Locally Significant Industrial Site and will therefore require an operational bus garage of equivalent capacity to be retained / re-provided, unless TFL confirms that the garage is no longer operational required or a suitable replacement can be found elsewhere. Policy BT4 would ensure consideration around pedestrian and cycle safety if the bus depot is re-provided.</p>								<p>The site has a PTAL primarily of 3 and will therefore likely require parking infrastructure, encouraging car dependence and increasing associated traffic and pollution. The redevelopment of this site will also include the loss of a bus depot which may harm public transport services and should therefore be replaced on site if viable. The site has mild flooding concerns which should easily be mitigated with sufficient soft landscaping.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
Gower House 5 Blackbird Hill (BESA3)	+	+	+	+	++	0	+	+	0	0	0	--	-	+	0	0	++	+	-	+

Comments	The site is within a London Strategic Area for Regeneration with a capacity of 30 dwellings. The site has good access to a range of essential infrastructure, including healthcare, schooling, local shops/services, open space and sports facilities. Redevelopment of the site will need to provide for D1 community uses which will be lost by the demolition of the private school/ nursery which occurred on the site.	This site currently has a PTAL of 3 but sits on a public transport corridor with the potential for improvement as it sits between two growth areas. It is in an AQMA and due to PTAL level will result in some traffic generation. Its redevelopment will bring into use a vacant site that has recently had a building demolished on it. The hilltop position means flooding potential is limited from all sources.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will bring a vacant/ derelict site into use and potential negative impacts can be mitigated and wider sustainability benefits achieved.	

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	+	+	+	-
Comments	The site is not within a London Strategic Area for Regeneration; however, it is proposed to be an extension to an existing Growth Area which has been previously identified as being a sustainable location to accommodate significant growth. The								The site has a low PTAL and is likely to require parking facilities for residents, increasing associated traffic and pollution. Redevelopment should significantly enhance the site, bringing it forward for mixed use development, enhancing the public domain and increasing the value and connectedness of existing non-											

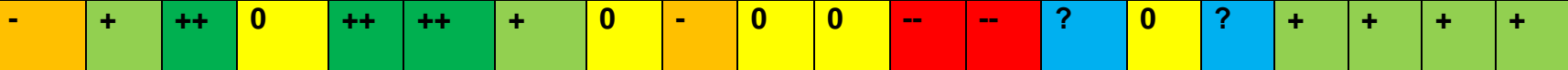
	<p>site is located within an area which is not subject to particularly high crime rates. The area is well catered for in terms of essential infrastructure including healthcare, schooling, and sports/open space.</p> <p>A large portion of the site is designated as Locally Significant Industrial Land and although will be developed as mixed use, including residential, the site should maintain and enhance existing floorspace. The frontage facing Edgware road will also require activating commercially, acting to join up the town existing town centres.</p>	<p>designated green space and Grove Park. Increased green infrastructure will be essential in mitigating potential surface water flooding, as will the incorporation of SUDS. The groundwater flooding will need to be investigated and mitigated accordingly.</p>																		
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In addition to this the site also suffers from groundwater flooding which will need to be investigated and addressed accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
Colindale Retail Park, Multi-Storey Car Park and Southon House (BNSA2)																				

<p>Comments</p>	<p>The site is not within a London Strategic Area for Regeneration, however it is located within the boundaries of the Burnt Oak and Colindale Growth Area which was previously identified by the Council as being a sustainable location to accommodate significant growth. The site is within an area which is not subject to particularly high levels of crime. The area is well accounted for in terms of essential infrastructure with the exception of schools. The site is close to the borough boundary and may be served by facilities which are in the neighbouring borough of Barnet.</p> <p>The site currently consists of a mix of uses which redevelopment is set to mimic, enhancing commercial and industrial floorspace. The frontage facing Edgware road will require activating, acting to join up the existing town centres.</p>	<p>The PTAL rating of the site varies from 2-4 and is likely to require parking facilities for residents, increasing associated traffic and pollution. Redevelopment should significantly enhance the site, bringing it forward for mixed use development, enhancing the public domain and increasing its permeability for pedestrian access. Increased green infrastructure will be essential in mitigating potential surface water flooding, as will the incorporation of SUDS. The groundwater/sewage flooding will need to be investigated and mitigated accordingly.</p>
<p>Conclusion</p>	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In addition to this the site also suffers from groundwater flooding which will need to be investigated and addressed accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>	

Queensbury LSIS and Morrisons (BNSA3)	-	+	++	++	++	++	++	0	0	0	0	--	-	?	0	0	+	0	+	-	
Comments	<p>This site is not within a London Strategic Area for Regeneration, however, it is within an area associated with high levels of crime. The significant redevelopment which could come forward with this site allocation will help improve the public domain and reduce crime rates. The site is well served by local goods and services being within walking distance to Kingsbury Town Centre and essential infrastructure including healthcare and schools. The site currently contains a large supermarket which should be retained under redevelopment helping cater for the wider area.</p> <p>The site contains two Locally Significant Industrial Sites which will look to be intensified during redevelopment, ensuring there is no overall net loss in LSIS floorspace.</p>								<p>The site has a relatively low PTAL and therefore may require the provision of parking facilities, potentially increasing vehicle dependence and associated traffic and pollution, reducing air quality for which the site scored negatively. The site is bound to the east by a wildlife corridor. Development should not reduce the ecological value of this site but enhance it through the provision of additional green infrastructure, improving its integration with surrounding greenspace. The site has concerns over both groundwater and surface water flooding which will need to be addressed prior to development, implementing any necessary mitigation techniques.</p>												
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure in which is associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary measures of mitigation such as SUDS. In addition to this the</p>																				

	site also suffers from groundwater flooding which will need to be investigated and addressed accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Former Mecca Bingo Site (BNSA4)	-	-	++	+	++	++	-	0	+	0	0	--	0	+	0	?	++	+	+	+
Comments	This site is not within a London Strategic Area for Regeneration, however, it is within an area associated with high levels of crime. The site has good access to a range of goods and services by virtue of its proximity of its position within Burnt Oak Town Centre. The site has scored negatively against proximity to both schools and healthcare, however, the site is located on the borough boundary and may be served by facilities in the neighbouring boroughs.										The site has a good PTAL which should help facilitate the implementation of a car free development, helping to encourage more sustainable modes of transport, reducing associated traffic and air pollution, improving air quality for which the site has scored negatively. The site is currently unused and will benefit greatly from redevelopment. This is particularly important as the building is Grade II listed and is a 'Building at Risk' contained on Historic England's Heritage at Risk Register. Redevelopment should therefore seek to enhance this asset, being sure as not to impact upon its character.									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. The site is not within close proximity to either schools or healthcare facilities, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. The listed building on site will benefit greatly from redevelopment as it is currently out of action, helping rejuvenate this heritage asset and incorporating its character back into the local image. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Former Kingsbury Library and Community Centre (BNSA5)	-	+	++	+	++	++	++	0	-	0	0	0	--	+	0	0	+	+	+	+

Comments	The site is not within a London Strategic Area for Regeneration, however, the area does experience high levels of crime. The site is well served by local facilities, being positioned within equidistance of three town centres with nearby strategic employment areas. Healthcare and schooling are within close proximity to the site, with Roe Green Park adjacent to the rear for open space.	The site has a low PTAL of 2 and may therefore require the provision of parking facilities which will increase vehicle dependence and associated traffic and pollution. The site is not within an air quality management area, however, development should still seek to be air quality neutral, maintaining one of the few areas with good air quality within the borough.																				
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. Development should seek to at least be air quality neutral, minimising the impacts associated with the predicted increase in vehicular usage. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																					
Ex-Volkswagen Garage (BNSA6)	<table border="1" style="width:100%; text-align:center; border-collapse: collapse;"> <tr> <td style="width:5%;">-</td><td style="width:5%;">+</td><td style="width:5%;">+</td><td style="width:5%;">+</td><td style="width:5%;">++</td><td style="width:5%;">++</td><td style="width:5%;">-</td><td style="width:5%;">0</td><td style="width:5%;">-</td><td style="width:5%;">0</td><td style="width:5%;">0</td><td style="width:5%;">--</td><td style="width:5%;">--</td><td style="width:5%;">?</td><td style="width:5%;">0</td><td style="width:5%;">0</td><td style="width:5%;">+</td><td style="width:5%;">+</td><td style="width:5%;">+</td><td style="width:5%;">+</td> </tr> </table>		-	+	+	+	++	++	-	0	-	0	0	--	--	?	0	0	+	+	+	+
-	+	+	+	++	++	-	0	-	0	0	--	--	?	0	0	+	+	+	+			
Comments	The site is within a London Strategic Area for Regeneration which experiences high crime rates. Well provided for by essential goods and services being within close proximity to Colindale Town Centre. The site has scored negatively against schooling, being more than 500 metres from a primary school, however, the site is on the	The site has a low PTAL of 2 and will therefore require the provision of parking facilities which will increase vehicle dependence and associated traffic and air pollution, reducing air quality for which the site already scores negatively, and should aim to be air quality neutral.																				

	borough boundary and may be served by facilities in the neighbouring borough.	
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of schooling, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.	
Kingsbury Trade Centre (BNSA7)		
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site is well served with goods and services being within walking distance to Kingsbury Town Centre and within close proximity to healthcare and schooling.</p> <p>Redevelopment of the site must include the reprovision of existing commercial floorspace, ensuring no net loss.</p>	<p>The site has a low PTAL of 2 and will therefore require the provision of parking facilities which will increase vehicle dependence and associated traffic and air pollution, reducing air quality for which the site already scores negatively, and should aim to be air quality neutral. The site is within a Site of Archaeological Importance. Redevelopment should therefore be sympathetic to this asset, undertaking any necessary preparatory works prior to construction or demolition.</p>
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability	

	standards which reduces energy usage and emissions. The site is within a Site of Archaeological Importance. Development should therefore take this into consideration, taking the necessary precautions prior to development in order to protect the value of this asset. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Queensbury Underground Station Carpark (BNSA8)	-	-	+	+	++	+	-	0	0	0	0	-	0	+	0	0	+	+	+	--
Comments	The site is not within a London Strategic Area for Regeneration, however, it is in an area associated with high levels of crime. The site has good access to open space, but has scored poorly in relation to schooling and healthcare. However, the site is located on the borough boundary, and may be served by facilities in the neighbouring boroughs. The site is allocated for residential development of approximately 36 dwellings and re-provision of the car park.										The site has an average / medium PTAL rating, however, the site is adjacent to Queensbury tube station which should help facilitate the implementation of a car free development, helping to encourage more sustainable modes of transport, reducing associated traffic and air pollution, improving air quality. The majority of the site (more than 50%) is within a 1 in 100-year surface water flood risk area, which means that mitigations will need to be put in place in relation to this.									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. The site is not within close proximity to either schools or healthcare facilities, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site is not within an AQMA, but is within 50m of a railway line. However, the majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. More than 50% of the site is within a 1 in 100-year surface water flood area, therefore, mitigations will need to be put in place regarding this. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

North 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
Kenton Road Sainsbury's (BNWSA1)	-	+	++	++	0	++	-	0	+	0	0	-	0	?	0	0	+	+	+	-
Comments	<p>The site is not within a London Strategic Area for Regeneration and neither is it susceptible to high levels of crime. Redevelopment will therefore not go toward benefitting the most deprived within the borough. The site is within Kenton town centre and therefore has access to a wide range of facilities including healthcare and sports/open space. Although the site is close to a secondary school, the nearest primary school is over 1000m away, however, the site is on the edge of the borough and may be served by facilities in the neighbouring borough of Harrow.</p> <p>The site is currently occupied by a Sainsbury's and represents Kenton Town Centre Primary Shopping Frontage. Redevelopment should therefore retain the commercial/employment floorspace, enhancing it if possible.</p>								<p>The site has a high PTAL of both 4 and 5 and should therefore aim for the residential element to be a car free development, reducing any associated traffic and pollution. The site is adjacent to railway tracks which are a designated wildlife corridor and therefore represents an opportunity to enhance the green infrastructure on site, with attempts to integrate into this existing nature reserve. The site is only partially in an Air Quality Management Area and in close proximity to the A4006. The site is also susceptible to sewer and groundwater flooding which should be addressed early on in the planning stage.</p>											

Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The site has groundwater flooding concerns which should be investigated and mitigated accordingly. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
Northwick Park Hospital (BNWGA1)	-	+	++	++	0	++	++	0	+	0	0	-	0	?	-	0	+	+	+	-
Comments	<p>The site is not within a London Strategic Area for Regeneration and neither is it susceptible to high levels of crime. Redevelopment will therefore not go towards benefitting the most deprived within the borough. The site is well provisioned in terms of essential infrastructure, with an on-site hospital and neighbouring Northwick park for open space and sports. There is a primary school within close proximity south of the site.</p> <p>The site will be of mixed use development and should help provide a significant residential uplift, but also provide some employment floorspace, with the potential for specialised fields of work to be included.</p>										<p>As a site of over 30 hectares in size, the site experiences a wide range of PTALs with the majority of land designated 3, 4 and 5. This will hopefully facilitate the development of very low levels of parking. This will be particularly important as the local road network already experiences congestion and will require extensive alterations should this site bring forward a significant uplift in dwellings. Access to Northwick Park Tube Station will require improvements to facilitate more inclusive access as well as increased capacity. These measures should aggregate to help reduce car dependence on site, reducing any associated traffic and pollution. The development includes plans to relocate the sports pavilion on Metropolitan Open Land (MOL). The impact of this decision will need to be considered thoroughly, ensuring re-provision greenspace so that there is no net loss of MOL.</p>									

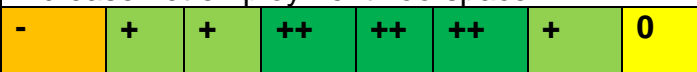
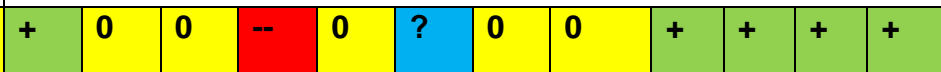
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. Part of the site represents protected open space which if redeveloped, will require re-provision ensuring no net loss and general enhancement. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>
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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	+	+	+	-
Comments	<p>The site is situated in a London Strategic Area for Regeneration and will achieve an uplift of approximately 220 dwellings to the local area. This provides an opportunity to introduce affordable housing and investment within a more deprived area. The site has a relatively high PTAL of both 3 and 4, and is well serviced by local goods and services as well as key infrastructure such as healthcare and schools. The west section of this site is a Locally Significant Industrial Site which redevelopment will look to enhance and increase the overall employment floorspace.</p>								<p>The site has a PTAL of both 3/ 4 making it appropriate for car free development. It is expected to have a neutral impact on air quality. As with most of Brent the site is within an Air Quality Management Area. The site has some flooding concerns which should be addressed at the planning stage. Development will be required to reduce flood risk.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and</p>																			

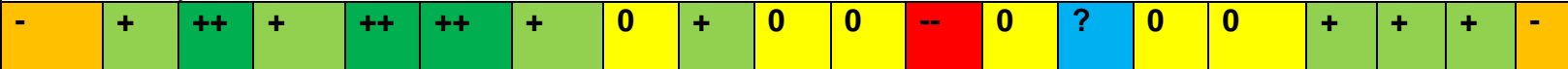
	incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
B&M & Cobbold Industrial Estate (BSSA2)	++	+	++	++	++	++	++	0	-	0	0	--	--	?	0	0	+	+	+	-
Comments	<p>The site is a London Strategic Area for Regeneration and will achieve an uplift of approximately 160 dwellings to the local area. The area is also associated with high crime rates and will benefit greatly from investment and the addition of affordable housing. The site is well serviced by local goods and services, including key infrastructure such as healthcare and schools.</p> <p>The site is a Locally Significant Industrial Site which redevelopment will enhance and increase net employment floorspace.</p>								<p>The site has a low PTAL, primarily of 2, which will mean the likely requirement of parking provision. Redevelopment should still aim to be air quality neutral as the site is within an Air Quality Management Area (AQMA). The site has some flooding concerns which should be addressed at the planning stage. Development will be required to reduce flood risk.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. Contributions to improvements to the bus network may be required to increase PTAL. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			

Church End Local Centre (BSSA3)	+	+	++	++	++	++	+	0	0	0	0	--	-	+	0	?	+	+	+	-	
	The site is within a London Strategic Area for Regeneration and experiences high levels of crime and will therefore benefit greatly from redevelopment. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling. The site is allocated for commercial use, a new market, and housing (indicative capacity 195 dwellings)								The site has a PTAL rating of 2/3. However, this could increase on implementation of the West London Orbital. Redevelopment should still aim to be air quality positive as the site is within an Air Quality Management Area (AQMA). Church Road and Eric Road are within Flood Zone 3a due to surface water flooding. Development will be required to reduce flood risk. The site also includes a Grade II listed building and locally listed buildings, and is within an Archaeological Priority Area and partly within a Site of Archaeological Importance.												
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. This problem is exacerbated by the site's relatively low PTAL, however, this should improve upon implementation of the West London Orbital. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. Development will be required to take into account flood risk issues and mitigation put in place with regards to this. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
Chapman's & Sapcote Trading Estate (BSSA4)	0	+	++	++	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	-	
Comments	The site is within close proximity to a London Strategic Area for Regeneration and will achieve an uplift of approximately 300 dwellings to the local area. The area is associated with high crime rates and will								With a high PTAL of 4 and 5, redevelopment of this site should aim to be car free, having a neutral impact on air quality as the site is within an Air Quality Management Area (AQMA). The site has some flooding concerns which should be addressed at the												

	<p>benefit greatly from investment and the addition of affordable housing. The site has a strong PTAL of both 4 and 5, and is well serviced by local goods and services, including key infrastructure such as healthcare and schools.</p> <p>The site is a Locally Significant Industrial Site which redevelopment will enhance and increase net employment floorspace.</p>	<p>planning stage. Development will be required to reduce flood risk.</p>
Willesden Bus Depot (BSSA5)		
Comments	<p>Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre. The site is fairly large and well situated with a high PTAL, providing an opportunity to develop approximately 150 dwellings depending on the density of the development.</p>	<p>The site has a high PTAL meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The site has some flooding concerns which should be addressed at the planning stage. Development will be required to reduce flood risk.</p>
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>	

Argenta House and Wembley Point (BSSA6)	0	+	++	+	+	-	-	0	+	0	+	--	0	+	0	0	+	--	-	-	
Comments	<p>The site is within 100 metres of a London Strategic Area for Regeneration and is in close proximity to essential services such as healthcare, open space and sports facilities. The site is not within close proximity to a town centre or secondary schools.</p> <p>This site will constitute a temporary loss of employment floorspace during construction. However, affordable workspace will be sought on site associated with a new mixed use community.</p>								<p>The site has a high PTAL of 4 meaning development should aim to be car free. Wembley Brook passes through a culvert on the site and development represents an opportunity to enhance this watercourse through naturalisation. The site is within an Air Quality Management Area with the primary sources of pollution coming from the North Circular road and Harrow Road. The site currently has significant flood risk potential, both fluvial and surface water, being in close proximity to Wembley Brook and the River Brent.</p>												
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and close proximity to healthcare, open space and sports facilities, helping direct investment toward an area associated with high crime rates. The site has scored negatively with regards to its proximity to a local town centre and schooling facilities. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. Concerns over fluvial flooding may be mitigated through the better management of the watercourse which passes through the site. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																				
Bridge Park & Unisys Building (BSSA7)	++	+	++	++	++	-	+	0	0	0	0	--	-	?	0	0	+	--	-	-	

<p>Comments</p>	<p>The site is situated within a London Strategic Area for Regeneration. It should be possible for the site to bring forward approximately 500 residential units due to the sites location and general character of the area. The site is more than 800 metres from a town centre, however, there are facilities within close proximity along Harrow road. The area will benefit greatly from investment which could help reduce crime and relative poverty within the area.</p> <p>The site currently includes a leisure centre which will need be replaced with a more modern facility improving access to community facilities within the site and surrounding area.</p>	<p>Although the site is in close proximity to Stonebridge Park Station it is obstructed by the north circular road which means the site has a relatively low PTAL and may require parking facilities. The site is within an Air Quality Management Area (AQMA) with sources of immediate pollution arising from the North Circular road and Harrow road. The site currently has significant flooding concerns, both fluvial and tidal, and surface water. This is due to the sites proximity to the River Brent and its tributary Wembley Brook with exacerbation from the areas general low permeability. It is imperative that redevelopment of the site introducing sufficient mitigation measures to reduce the risk of flooding.</p>																																						
<p>Conclusion</p>	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and close proximity to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high crime rates. Although the site is well catered for in terms of infrastructure, it is not within close proximity to a town centre and scores negatively because of this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. Concerns over fluvial flooding may be mitigated through the better management of the watercourse which passes through the site. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																																							
<p>McGovern's Yard (BSSA8)</p>	<table border="1"> <tr> <td>-</td><td>+</td><td>+</td><td>+</td><td>++</td><td>++</td><td>+</td><td>0</td><td>+</td><td>0</td><td>0</td><td>--</td><td>0</td><td>?</td><td>0</td><td>0</td><td>+</td><td>+</td><td>+</td><td>+</td> </tr> </table>																				-	+	+	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	+
-	+	+	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	+																					

	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre.	The site has a high PTAL meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The current industrial usage of this site is inappropriate, being within a housing estate and would benefit from redevelopment, becoming more in-keeping with the character and function of the immediate area.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	
Barry's Garage (BSSA9)		
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre.	The site has a high PTAL meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The site has some flooding concerns which should be addressed at the planning stage of development. Development will be required to reduce flood risk.
Conclusions	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	

Dudden Hill Community Centre (BSSA10)	-	+	+	n/a	++	++	+	0	+	0	0	--	0	+	0	0	+	+	+	-	
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre. The redevelopment will include a new community centre to replace the existing facility.								The site has a high PTAL of 5 meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The existing site includes a games court and a playground which have fallen into disrepair creating a poor environment. The development will result in environmental enhancements.												
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																				
Euro Car Rental (BSSA11)	+	+	++	+	++	++	+	0	-	0	+	--	--	?	0	0	+	+	-	-	
Comments	This site scores highly for socio-economic factors due to its prime location in relation to essential services and infrastructure such as town centres, employment opportunities, sports and open space, and schools. The site is also within a London Strategic Area for Regeneration and has high crime, therefore								With a low PTAL of 1b/2, this site is likely to increase traffic within the area, including the associated air and sound pollution. The site is adjacent to the Canal Feeder which is a wildlife corridor and an opportunity for redevelopment to better enhance a watercourse which in turn should improve the general environment and reduce the sites negative visual impact upon the adjacent temple. The enhancement of the watercourse and												

	<p>represents an opportunity for enhancement through redevelopment.</p> <p>This site will constitute a small loss of employment floorspace which will require replacement upon redevelopment.</p>	<p>the increased green infrastructure should also serve to reduce the concerns of flooding on the site.</p>																		
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
296 – 300 High Road (BSSA12)																				
Comments	<p>Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre.</p>	<p>The site has a high PTAL of 5 meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The site is previously developed.</p>																		

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Learie Constantine Centre (BSSA13)	-	+	+	+	++	++	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned in terms of facilities, reflecting its position between Church End town centre and Willesden Green town centre. The redevelopment will include a new community centre to replace the existing facility.										The site has a high PTAL meaning development would be car free. The associated reduction in car usage will reduce traffic and have air quality benefits in this Air Quality Management Area (AQMA). The existing building on this site is only single storey and is therefore not in general conformity with local character and will therefore benefit from redevelopment.									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Although the site has access to a wide range of facilities, it is not within close proximity to a local town centre and therefore scores negatively against this. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. Concerns over fluvial flooding																			

	may be mitigated through the better management of the watercourse which passes through the site. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Morland Gardens (BSSA14)	+	+	++	+	++	++	++	0	+	0	0	--	0	+	0	?	0	+	+	+
Comments	The site is within a London Strategic Area for Regeneration and experiences high levels of crime and will therefore benefit greatly from significant levels of redevelopment. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling.								The site has a good PTAL of 4 which will allow for a car free development, reducing local traffic and associated pollution, improving air quality for which the site scores negatively. 1 Morland Gardens is a Local Heritage Asset and should be retained and enhanced as part of the overall design if possible.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The site contains a Local Heritage Asset which should be retained and enhanced if possible, with the remainder of the development being in conformity with the design and character of this asset. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Harlesden Station Junction (BSSA15)	+	+	++	0	++	++	++	0	+	0	0	--	0	?	-	0	+	+	+	-
Comments	The site is within a London Strategic Area for Regeneration and is associated with high								The site has a strong PTAL of 6 and will therefore support car free development, reducing local traffic and associated pollution,											

	<p>levels of crime. The development should also incur a significant uplift in residential dwellings. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling. The site represents secondary shopping frontage and will therefore require reprovision, incurring no net loss of commercial floorspace.</p>	<p>improving air quality. The site is within an Archaeological Priority Area and will therefore need to take the necessary precautions in order to prevent damage to this asset. There are also some minor surface water flooding concerns on site which can be addressed with the implementation of SUDS.</p>																				
<p>Conclusion</p>	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. The site is within an Archaeological Priority Area and will need to take necessary precautions in order to preserve this asset. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																					
<p>Mordaunt Road (BSSA16)</p>	<table border="1"> <tr> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #008000;">++</td> <td style="background-color: #FFFF00;">0</td> <td style="background-color: #008000;">++</td> <td style="background-color: #008000;">++</td> <td style="background-color: #008000;">++</td> <td style="background-color: #FFFF00;">0</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #FFFF00;">0</td> <td style="background-color: #FFFF00;">0</td> <td style="background-color: #FF0000;">--</td> <td style="background-color: #FFFF00;">0</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #FFFF00;">0</td> <td style="background-color: #FFFF00;">0</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> </tr> </table>		+	+	++	0	++	++	++	0	+	0	0	--	0	+	0	0	+	+	+	+
+	+	++	0	++	++	++	0	+	0	0	--	0	+	0	0	+	+	+	+			
<p>Comments</p>	<p>The site is within a London Strategic Area for Regeneration and experiences high levels of crime and will therefore benefit greatly from redevelopment. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling.</p>	<p>The site has a high PTAL of 5 which will allow for a car free development, reducing local traffic and associated pollution, improving air quality for which the site scores negatively.</p>																				

Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
Harlesden Railway Generation Station (BSSA17)	+	+	++	0	++	++	++	0	+	0	0	--	0	+	0	0	+	+	+	-
Comments	<p>The site is within a London Strategic Area for Regeneration associated with high levels of crime. The site is also well provisioned with essential facilities being within close proximity to Harlesden town centre and within walking distance to healthcare and schooling as well as employment opportunities.</p>								<p>The site has a good PTAL of 4 which should facilitate the uptake of a car free development, reducing associated traffic and pollution, increasing air quality for which the site scored negatively. The site is adjacent to the train tracks which are a designated Wildlife Corridor. Development should be sensitive so as not to reduce the ecological value of this site, enhancing it where possible with the inclusion of green infrastructure which will also serve to address the minor surface water flooding concerns on site.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards</p>																			

	which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Harlesden Telephone Exchange (BSSA18)	+	+	++	+	++	++	++	0	++	0	0	--	0	?	0	?	+	+	+	-
Comments	<p>The site is within a London Strategic Area for Regeneration and is associated with high levels of crime. The development should also incur a significant uplift in residential dwellings. The site is also well provisioned in terms of goods and services, including essential infrastructure such as healthcare and schooling.</p> <p>The site represents secondary shopping frontage and will therefore require re-provision, incurring no net loss of commercial floorspace.</p>								<p>The site has a strong PTAL of 6 and will therefore support car free development, reducing local traffic and associated pollution, improving air quality. The site is within an Archaeological Priority Area and will therefore need to take the necessary precautions in order to prevent damage to this asset. There are also some minor surface water flooding concerns on site which can be addressed with the implementation of SUDS.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. The site is within</p>																			

	an Archaeological Priority Area and will need to take necessary precautions in order to preserve this asset. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Chancel House (BSSA19)	+	+	++	0	++	++	+	0	0	0	0	--	-	-	0	0	+	+	+	-
Comments	This site is within a London Strategic Area for Regeneration which is associated with high crime rates. The site is well provisioned with essential infrastructure being within close proximity to Church End Town Centre, however, is greater than 1km from a secondary school. This will therefore make it an excellent location for redevelopment into a school.										The site has a relatively low PTAL, however, this will serve the local community for secondary schooling, taking pressure off of other local facilities for which local pupils may have needed to be driven, reducing associated traffic and pollution, improving air quality for which the site scored negatively. The site has some surface water flooding concerns which should be easily addressed using appropriate design techniques, incorporating green infrastructure and SUDS where necessary.									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Harlesden Neighbourhood Plan site allocations	<p>The following sites are allocated in the Harlesden Neighbourhood Plan:</p> <ul style="list-style-type: none"> • Harley Road • Carsales at junction of High Street and Furness Road • Former Willesden Ambulance Station • Land at Challenge Close 																			

- Salvation Army & Manor Park Works
- Harlesden Plaza

These sites have not been assessed through the IIA as they form part of the made Harlesden Neighbourhood Plan, which has been subject to a Strategic Environmental Assessment.

The Harlesden Neighbourhood Plan can be viewed here: <https://www.brent.gov.uk/media/16412964/np-final-may-2019.pdf>

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 (BESA1)	+	+	++	+	++	+	+	0	+	0	0	-	0	+	0	0	+	+	+	-
Comments	<p>This site is within a London Strategic Area for Regeneration and should provide approximately 100 residential units. The area currently has high crime levels which may be exacerbated by the buildings poor design, with inactive ground floor frontages. Redevelopment will help to reduce crime within the immediate area through increased passive surveillance. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.</p> <p>The site currently contains some community/cultural uses which will require retention upon redevelopment.</p>								<p>The site has a high PTAL making it suitable for car free development, reducing associated traffic and air pollution. The existing building on site provides a poor environment and will therefore not be beneficial to retain. Its replacement with a more appropriate building incorporating sound modern design principals will help improve the feel of the area and create a sense of place. The sites current has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk.</p>											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Blake (BSESA2)	++	+	++	++	++	+	+	0	+	0	0	--	0	+	0	0	+	+	+	-
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 120 residential units. The area currently has high crime levels which may be exacerbated by the buildings poor design, with inactive ground floor frontages. Redevelopment will help to reduce crime within the immediate area through increased passive surveillance. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.									The site has a high PTAL making it suitable for car free, reducing associated traffic and air pollution. The existing building on site provides a poor environment and will therefore not be beneficial to retain. Its replacement with a more appropriate building incorporating sound modern design principals will help improve the feel of the area and create a sense of place. The site currently has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk.										
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by																			

	increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Carlton House (BSESA3)	+	+	++	++	0	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 60 residential units. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.									The site has a good PTAL rating of 5 and is therefore suitable for car free development, reducing associated traffic and air pollution. The site will benefit from a change in layout, restructuring the site in accordance with surrounding allocations in order to provide clarity as to which areas of open space are private and which are public. This will serve to increase the usage of the open space by both residents and the general public.										
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Carlton Infant School (BSESA4)	+	+	++	+	0	+	+	0	-	0	0	--	--	?	0	0	+	+	+	-
Comments	The existing school on this site will be reprovided on the Wordsworth and Masefield site allocation and will therefore not represent a loss of school floorspace. This site is within a London Strategic Area for Regeneration and should provide approximately 62 residential units. The site has high levels of accessibility to essential infrastructure such									The site has a poor PTAL rating of 2, however, the neighbouring site of Kilburn Park Junior School has a PTAL rating of 5. Therefore, it should be possible for this site to have limited parking facilities provided in order to reduce potential traffic and carbon emissions. The site has some surface water flooding concerns which can be mitigated via the incorporation of SUDS.										

	as healthcare, schooling, and sporting facilities.																					
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																					
Craik (BSESA5)	<table border="1"> <tr> <td>++</td><td>+</td><td>++</td><td>-</td><td>0</td><td>+</td><td>+</td><td>0</td><td>+</td><td>0</td><td>0</td><td>--</td><td>0</td><td>?</td><td>0</td><td>0</td><td>+</td><td>+</td><td>+</td><td>+</td> </tr> </table>		++	+	++	-	0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	+
++	+	++	-	0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	+			
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 120 residential units, although there will be net loss of units overall. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.	The site has a good PTAL rating of both 4 and 5 and is therefore suitable for car free development, reducing associated traffic and pollution. The site will benefit from a change in layout, restructuring the site in accordance with surrounding allocations in order to provide clarity as to which areas of open space are private and which are public. This will serve to increase the usage of the open space by both residents and the general public.																				
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																					

Crone & Zangwill (BSESA6)	+	+	++	+	0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	-
Comments	<p>This site is within a London Strategic Area for Regeneration and should provide approximately 145 residential units. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.</p>								<p>The site has a good PTAL rating of both 4 and 5 and therefore suitable for car free, reducing associated traffic and air pollution. The site will benefit from a change in layout, restructuring the site in accordance with surrounding allocations in order to provide clarity as to which areas of open space are private and which are public. This will serve to increase the usage of the open space by both residents and the general public. Flooding concerns will be mitigated through the incorporation of SUDS and soft landscaping.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
Dickens (BSESA7)	+	+	++	+	++	+	+	0	0	0	0	--	-	+	0	0	+	+	+	-
Comments	<p>This site is within a London Strategic Area for Regeneration and should provide approximately 60 residential units. The area currently has high crime levels which may be exacerbated by the buildings poor design, with inactive ground floor frontages. Redevelopment will help to reduce crime within the immediate area through increased</p>								<p>The site has a PTAL rating of 3, however, it is still within close proximity to Queen's Park Station and should therefore still aim to be car free or light. This will help to reduce traffic and associated air pollution within the borough. The site has some minor surface water flooding concerns which can be mitigated through SUDS and soft landscaping.</p>											

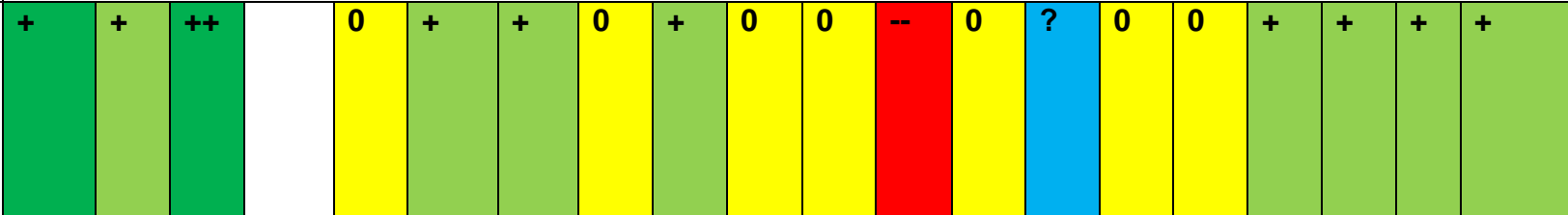
	passive surveillance. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.	
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	
Hereford House & Exeter Court (BSESA8)		
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 200 residential units, although there will be a net gain of fewer than 100. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.	The site has a high PTAL and is therefore suitable for car free development, reducing associated traffic and air pollution. The existing building on site provides a poor environment and will therefore not be beneficial to retain. Its replacement with a more appropriate building incorporating sound modern design principals will help improve the feel of the area and create a sense of place. The site is earmarked to offset the loss of Granville Open Space with the provision of a replacement open space. This will improve the site aesthetically and will also serve to mitigate the significant surface water flooding concerns by increasing land permeability with soft landscaping.

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Kilburn Park Junior School (BSESA9)	+	+	++	0	0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	+
Comments	The existing school on this site will be reprovided on the Wordsworth and Masefield site allocation and will therefore not represent a loss of school floorspace. The open space lost as a result of the school relocation will be reprovided here to create a more regular shaped park. There will be no net loss of open space. The site is within a London Strategic Area for Regeneration. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.									The site has a good PTAL rating of both 4 and 5 which will help provide residents with efficient access to the park and its facilities. The open space will be situated in a prominent area on this site being between both Queen’s Park and Kilburn Lane helping improve the area aesthetically and forming a sense of place.										
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution																			

	as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Neville & Winterleys (BSESA10)	+	+	++	+	0	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 140 residential units. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.										The site has a good PTAL rating of 5 and is therefore suitable for car free development, reducing associated traffic and air pollution. The site will benefit from a change in layout, restructuring the site in accordance with surrounding allocations in order to provide clarity as to which areas of open space are private and which are public. This will serve to increase the usage of the open space by both residents and the general public.									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Old Granville Open Space (BSESA11)	+	+	++	+	++	+	+	0	+	0	0	--	0	?	0	0	--	+	+	-
Comments	Site is within a London Strategic Area for Regeneration and should provide approximately 10 units. The site currently suffers from high levels of crime due to inactive frontage and poor site layout which redevelopment will address. The site is well provisioned with good access to essential infrastructure.								The site is currently a small open space, serving as a connector between the two parts of Granville road. This is set to be replaced and incorporated within the Hereford & Exeter site so there will not be an overall reduction in open space serving this community. The site has a high PTAL and should be car free, reducing negative impacts from traffic and air pollution.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against the loss of designated open space which will require re-provision to ensure no overall net loss. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Wordsworth & Masefield (BSESA12)	+	+	++	-	++	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	This site is within a London Strategic Area for Regeneration. Redevelopment will help to reduce crime within the immediate area through increased passive surveillance. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.								The site has a relatively high PTAL which will facilitate the development of a school whereby pupils generally use public transport or walk/cycle for travel. Therefore, the development should minimise parking provision in order to encourage active travel and use of public transport, reducing associated traffic and air pollution.											

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
John Ratcliffe House (BSESA13)	+	+	++	+	0	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	This site is within a London Strategic Area for Regeneration and should provide approximately 35 residential units. The site has high levels of accessibility to essential infrastructure such as healthcare, schooling, and sporting facilities.										The site has a high PTAL and therefore suitable for car free development, reducing associated traffic and air pollution. The existing building on site provides a poor environment and will therefore not be beneficial to retain. Its replacement with a more appropriate building incorporating sound modern design principals will help improve the feel of the area and create a sense of place.									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
William Dunbar (BSESA14)	++	+	++	++	0	+	+	0	+	0	0	--	0	?	0	0	+	+	+	+

Comments	The site is within a London Strategic Area for Regeneration with redevelopment providing a significant uplift of approximately 200 dwellings providing the area with more affordable housing. With a strong PTAL of 5, the site has good access to a range of goods and services, including healthcare and schooling. The site is not within close proximity to a secondary school, however, as it is close to the borough boundary it may be serviced by the neighbouring boroughs.	The site has a high PTAL and therefore suitable for car free development, reducing associated traffic and air pollution. Redevelopment should provide a strong active ground floor commercial frontages which will help strengthen connections between Queen's Park Station and the Peel development. Redevelopment will also increase the permeability of the area for pedestrians by opening up Denmark Road.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	
UK Albanian Muslim Community and Cultural Centre (BSESA15)		
Comments	The site is within a London Strategic Area for Regeneration. With a good PTAL of 4, the site has good access to goods and services, including healthcare and schooling. The site is not within close proximity to a secondary school, however, as it is close to the borough	The site has a high PTAL and therefore suitable for car free development, reducing associated traffic and air pollution. Given the high PTAL it will be acceptable to build at higher densities than exists, this will also provide the opportunity to enhance the streetscape, including active frontages upon redevelopment.

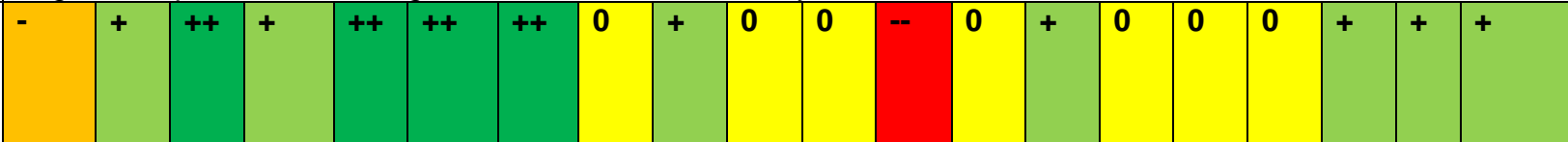
	boundary it may be serviced by the neighbouring boroughs.																			
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
OK Club (BSESA16)	+	+	++		0	+	+	0	+	0	0	--	0	+	0	0	+	+	+	+
Comments	The site is within a London Strategic Area for Regeneration. With a good PTAL of 4, the site has good access to goods and services, including healthcare and schooling. The site is not within close proximity to a secondary school, however, as it is close to the borough boundary it may be serviced by the neighbouring boroughs.		The site has a high PTAL and is therefore suitable for car free development, reducing associated traffic and air pollution. The sites current use as a community centre should be retained and enhanced. It may be possible to replace this facility off site providing this is not to the detriment of the local community.																	
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Cricklewood Broadway	-	+	++	+	0	++	+	0	0	0	0	--	-	?	0	0	+	+	+	-

Retail Park (BSESA17)																				
Comments	<p>The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. Neither is the site within an area with high levels of crime. The site has significant capacity and should provide an uplift of approximately 300 residential dwellings. The site has good access to facilities including sports, health and schooling and is in close proximity to Cricklewood town centre.</p>										<p>The site has a PTAL rating of both 3 and 4, and therefore could support car free or light development in order to reduce traffic and associated pollution. The site currently includes two big box stores with large amounts of parking and limited green infrastructure. This creates a poor environment and would benefit from redevelopment, bringing the site into greater conformity with local character. The sites current has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk.</p>									
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
243-289 Cricklewood Broadway (BSESA18)																				
Comments	<p>Site is within close proximity to a London Strategic Area for Regeneration and will hopefully provide a significant uplift in housing to the area of approximately 60 units. The site is within Cricklewood town centre and therefore has good access to a</p>										<p>The site has a good PTAL rating which will facilitate car free development reducing associated traffic and air pollution. The site currently creates a poor environment and is inconsistent with local character. Therefore, redevelopment would help bring the sites character back into local conformity, improving the environment generally.</p>									

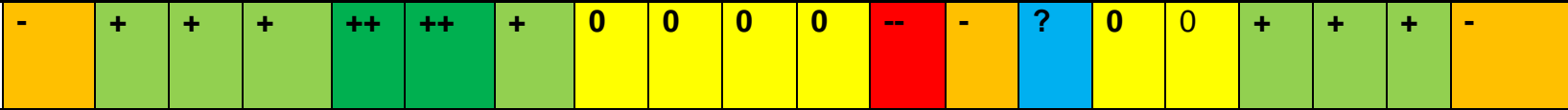
	<p>range of essential facilities including sports, healthcare and schooling.</p> <p>The site is designated as primary shopping frontage therefore requiring any redevelopment to replace/enhance any lost commercial/employment floorspace.</p>	
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>	
Gaumont State Cinema (BSESA19)		
Comments	<p>The site is within a London Strategic Area for Regeneration which has significant crime problems. The protection and increased use of this community/cultural facility will therefore have a high impact in this respect.</p> <p>The retention of this site for community/cultural purposes will help retain valuable employment opportunities for local residents.</p>	<p>The site has a high PTAL rating and in a town centre location. Meaning users can access via public transport and should not place further significant pressure on the road network. Continued use will protect this listed building for future generations.</p>
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of a community/cultural facility in a high PTAL location which resides within an area with high levels of access to essential infrastructure. This also helps direct investment toward a London Strategic Area for Regeneration, which</p>	

	also has high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Kilburn Market Square (BSESA20)	++	+	++	++	++	+	+	0	++	0	0	--	0	+	0	?	+	+	+	+
Comments	<p>The site is within a London Strategic Area for Regeneration which has significant crime problems. The site is large and should provide approximately 100 residential units, with a mixed development approach. The redevelopment of this site will enforce a sense of place and pride within the area, helping to reduce crime levels.</p> <p>The mixed use development will enable the creation of a new market and employment space.</p>										<p>The site has a PTAL of 6 which will facilitate car free, reducing associated traffic and air pollution. The sites current has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk. The creation of a new public square and soft landscaping as part of the development will improve the townscape.</p>									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

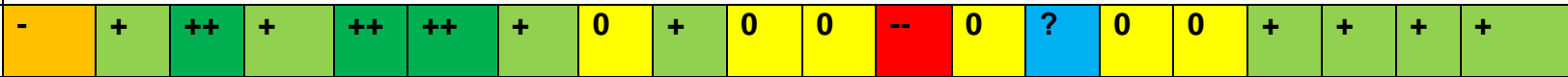
Sainsbury's and Garages (BSESA21)	-	+	+	+	++	++	++	0	+	0	0	--	0	?	0	0	+	+	+	-	
Comments	<p>Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. Being within Willesden Green the site has great access to essential goods and services, such as healthcare and schooling. The site is fairly large and should help uplift the area with 50 residential units, increasing town centre viability.</p> <p>The current use of the site as a supermarket helps meet the boroughs need for convenience retail floorspace. Therefore, any proposed development should include the retention of a supermarket.</p>								<p>The site has a good PTAL rating of 4 and is therefore suitable for car free development, helping reduce the dependency on personal vehicles, reducing associated traffic and emissions. The site currently has surface water flooding concerns as a result of its low permeability. Mitigation will be required to ensure development reduces flood risk.</p>												
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on private vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																				
Queens Parade (BSESA22)	-	+	+	+	++	++	++	0	+	0	0	--	0	?	0	0	+	+	+	+	

Comments	<p>Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is located within Willesden Green town centre and therefore has good access to a range of essential infrastructure, such as healthcare and schooling.</p> <p>The site is designated as primary shopping frontage and therefore any redevelopment will need to replace any lost commercial floorspace, retaining sufficient employment opportunities.</p>	<p>With a PTAL of 4, increasing to 5 come 2031 with the introduction of new public transport infrastructure, this site will support car free development. This will help improve the areas air quality and will facilitate more walking, improving the vitality of the town centre.</p>
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on private vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved</p>	
Willesden Green Police Station (BSESA23)		
Comments	<p>The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. Being within Willesden Green town centre the site has good access to facilities including sports, health and schooling.</p>	<p>The site has a good PTAL rating which will facilitate car free development reducing associated pollution and traffic.</p>
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct</p>	

	investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Kilburn Station Arches, Exeter Road, NW2 3UH (BSESA24)	-	-	++	0	++	+	+	0	+	0	0	--	0	+	0	0	0	+	+	+
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site is within Kilburn Town Centre and is designated as Secondary Shopping Frontage and therefore has good access to a range of goods and services. The site is not within close proximity to healthcare or secondary schooling, however, it is positioned on the borough boundary and may therefore be serviced by facilities in the neighbouring borough.</p> <p>As the site represents Secondary Shopping Frontage it is important that the commercial floorspace is not lost and is reprovisioned upon redevelopment.</p>									<p>The site has a strong PTAL of 5 which supports implementation of a car free development, reducing associated traffic and pollution, improving air quality for which the site scores negatively.</p>										

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of healthcare, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.	
Park Avenue Garage (BSESA25)		
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned for with essential infrastructure and access to local employment opportunities, being within walking distance of Willesden Green town centre.	With a PTAL of 3 the site will likely require parking facilities, potentially increasing traffic within the borough and associated carbon emissions, reducing air quality within the area. Part of the site is a risk of surface water flooding. This will require mitigation to ensure development reduces flood risk.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	

Park Avenue North Substation (BSESA26)	-	+	+	0	++	++	+	0	0	0	0	--	-	?	0	0	+	+	+	-		
	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned for with essential infrastructure and access to local employment opportunities, being within walking distance of Willesden Green town centre.								With a PTAL of 2 the site will likely require parking facilities, potentially increasing traffic within the borough and associated carbon emissions, reducing air quality within the area. Park Avenue North is at risk of surface water flooding with some sections encroaching onto the site. This will require mitigation to ensure development reduces flood risk. The adjacent railway tracks are a Wildlife Corridor which should not be disturbed by development.													
	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																					
Strode Road Car Wash (BSESA27)	-	+	++	0	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	+		
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned for, just being off of the main High Road and in close proximity to Willesden Green town centre and local employment opportunities.								The site has a good PTAL rating of 5 which should facilitate car free development. This will help mitigate air quality problems within the borough. The site is currently used as a car wash, consisting of a walled off car park with some small outbuildings which provides a sense of neglect. Redevelopment will help positively improve the area aesthetically.													

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on private vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	
Strode Road (BSESA28)		
Comments	Not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provisioned for, being just off the main High Road and in close proximity to Willesden Green town centre and local employment opportunities.	The site has a good PTAL rating of 5 which should facilitate car free development. This will help mitigate air quality problems within the borough. The area currently lacks green infrastructure, therefore redevelopment provides an opportunity to improve this situation.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on private vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved	

Willesden Telephone Exchange (BSESA29)	-	+	++	+	++	++	+	0	0	0	0	--	-	0	0	0	0	+	+	-
Comments	The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site has good access to facilities including sports, health and schooling and is in close proximity to Willesden Green town centre.								The site has a relatively low PTAL of 3 and therefore may require parking facilities, increasing car usage within the borough and its associated traffic and pollution.											
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence, associated traffic and pollution as it will likely require parking facilities. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
61 Shoot Up Hill (BSESA30)	-	+	++	+	++	++	-	0	+	0	0	--	0	?	0	?	0	+	+	+
Comments	The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site is well provided for in terms of most facilities with the exception of schools for which the site scored negatively. However, the site is on the borough boundary and may be served by schools and other facilities within the neighbouring borough.								The site has a good PTAL rating which will facilitate car free development reducing traffic and associated air pollution. The site currently includes two locally listed buildings which should be retained if possible. 65 Shoot Up Hill is a single storey garage and is not in-keeping with local character, creating a poor environment. Redevelopment will improve this site aesthetically and also help better utilise it, increasing its residential density.											

	There is a doctor's surgery on site which may need to be re-provided.																					
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, with the exception of schools, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																					
Turpins Yard (BSESA31)	<table border="1"> <tr> <td>+</td><td>+</td><td>++</td><td>+</td><td>++</td><td>++</td><td>+</td><td>0</td><td>+</td><td>0</td><td>0</td><td>--</td><td>0</td><td>?</td><td>0</td><td>0</td><td>+</td><td>+</td><td>+</td><td>-</td> </tr> </table>		+	+	++	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	-
+	+	++	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	-			
Comments	<p>The site is within a London Strategic Area for Redevelopment. The site is well provisioned in terms of infrastructure, including healthcare, schooling, and sporting facilities.</p> <p>This is a local employment site, with a number of prior approvals for conversion to housing. A mixed-use scheme will ensure employment space is provided and protected. This site currently represents valuable employment floorspace which is under threat of conversion to residential under permitted development rights. Redevelopment should retain/enhance this floorspace via a mixed development approach.</p>	<p>This site has a PTAL rating of 4 and should therefore be car free, reducing associated traffic and air pollution within the area. The sites current has low permeability and areas at risk of surface water flooding. Mitigation will be required to ensure development reduces flood risk.</p>																				
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration associated with high																					

	<p>levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
45-55 Cricklewood Broadway (BSESA32)	0	+	++	+	++	++	-	0	+	0	0	--	0	?	0	0	+	+	+	+
Comments	<p>Site is within close proximity to a London Strategic Area for Regeneration. The site is well provided for in terms of most facilities with the exception of schools for which the site scored negatively. However, the site is on the borough boundary and may be served by schools and other facilities within the neighbouring borough.</p> <p>The site is designated as secondary shopping frontage and therefore any existing commercial/employment floorspace will look to be retained/enhanced.</p>										<p>The site has a good PTAL rating which will facilitate car free development reducing traffic and associated air pollution. The site currently creates a poor environment and is inconsistent with local character. Therefore, redevelopment would help bring the sites character back into local conformity, improving the environment generally.</p>									
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, with the exception of schools, helping direct investment toward a London Strategic Area for Regeneration associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located</p>																			

	so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
123-129 Cricklewood Broadway (BSESA33)	+	+	+	+	++	++	+	0	+	0	0	--	0	?	0	?	+	+	+	+
Comments	<p>The site is within a London Strategic Area for Regeneration and experiences high levels of crime making it ideal for redevelopment. It is also well serviced by facilities being within Cricklewood Town Centre and within close proximity to schooling and healthcare.</p> <p>The site constitutes part of Cricklewood Town Centres Primary Shopping Frontage meaning redevelopment should incur no net loss of commercial floorspace.</p>										<p>The site has a good PTAL rating which will facilitate car free development reducing traffic and associated air pollution. The site is within a Site of Archaeological Importance and any redevelopment should therefore take measures to ensure the protection of this asset. The site will benefit from redevelopment, bringing it into greater conformity with the general character of Cricklewood Town Centre.</p>									
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward a London Strategic Area for Regeneration which is associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. The site is within a Site of Archaeological Importance and should therefore take the necessary precautions prior to development in order to ensure the protection of this asset. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			

Kilburn Park Underground Station (BSESA34)	+	+	++	?	++	+	+	0	++	0	0	--	0	0	0	?	0	+	+	-
<p>The site is within a London Strategic Area for Regeneration and experiences high levels of crime marking it ideal for redevelopment. The site is well served by facilities such as open space, but not as well served for healthcare and schooling. However, the site is located on the borough boundary and therefore may be served by facilities in a neighbouring borough. The site is allocated for use as a station on the ground floor and for commercial / residential on the upper floors. The amount of proposed residential use is unknown.</p>	<p>The site has a high PTAL which should facilitate car free development, helping to encourage more sustainable modes of transport, reducing associated traffic and air pollution, improving air quality for which the site has scored negatively. The site contains a listed building and redevelopment should therefore seek to enhance this asset, being sure as not to impact upon its character. Developers should provide a detailed analysis and justification of the potential impact of the development on the heritage asset.</p>																			
	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. The site is not within close proximity to either schools or healthcare facilities, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an AQMA. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
303-309 Cricklewood Broadway (BSESA35)	-	+	++	+	++	++	+	0	+	0	0	--	0	?	0	0	+	+	+	+

Comments	The site is not within or sufficiently close to help benefit London Strategic Areas for Regeneration. The site has significant capacity and should provide an uplift of approximately 50 residential dwellings. The site has good access to facilities including sports, health and schooling and is in close proximity to Cricklewood town centre.	The site has a good PTAL rating which will facilitate car free development reducing associated traffic and air pollution. The site will benefit from redevelopment to a form which is more sympathetic to uniform character and scale of Cricklewood High Road.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.	

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	-
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. The site is within close proximity to Ealing Road town centre and therefore has access to a wide range of essential facilities with the exception of schools. The site is close to the borough boundary and may make use of the facilities of the neighbouring borough of Ealing.</p> <p>The site is designated as a Locally Significant Industrial Site and an operational bus garage of equivalent capacity needs to be retained / re-provided on the site unless TfL confirms that it is no longer operationally required, or suitable replacement can be found elsewhere.</p>								<p>The site benefits from immediate proximity to Alperton Tube Station and therefore has a relatively high PTAL of 4. This should facilitate car free developments throughout the majority of the sites which will help reduce local traffic and pollution. The sites southern boundary is adjacent to the Grand Union canal and therefore represents an opportunity to enhance a watercourse, improving its integration with nature and the wider public realm. The promotion of a mixed residential/industrial development will make for a better public realm with higher quality design than currently exists, helping improve the sense of place. The railway tracks which border the site to the east are a wildlife corridor. Efforts should be made to integrate this into development proposals, increasing green infrastructure along this edge in particular. Helping reduce potential for flooding in the process.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores</p>																			

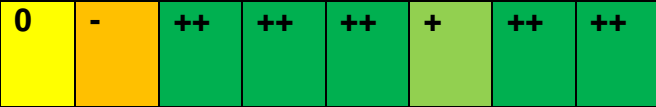
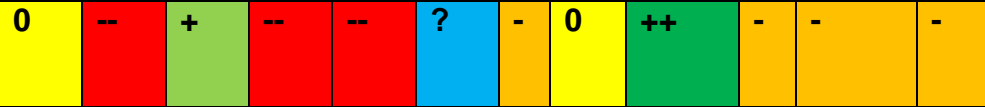


	<p>negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This development can enhance the on-site watercourse by contributing to naturalisation. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
<p>Sainsbury's Alperton (BSWSA2)</p>	-	+	++	++	++	++	-	0	0	0	+	--	-	+	0	?	0	+	0	-
	<p>The site is not within a London Strategic Area for regeneration, however, it is located within an area of high crime. The site is well served by facilities such as open space, distance to healthcare and services and facilities, however the site schools poorly in terms of walking distance to schooling provision. The site is allocated for residential development of approximately 200 dwellings, plus retention or replacement of the existing store.</p>										<p>The site has a fairly high PTAL of 4 but is located within the Alperton Growth Area, with a reasonable level of public transport accessibility. Development should aim to be air quality positive. The site is of archaeological importance, so proposals should demonstrate consideration of BHC1 towards the significance of the heritage asset and its wider context. The north of the site is adjacent to the Grand Union Canal, forming part of a green chain. A small proportion of the site is within an area with a risk of 1 in 100-year surface water flood risk.</p>									
	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. Development should provide a detailed analysis and justification of the potential impact of the development on the heritage asset. As the site is adjacent to the Grand Union Canal (part of a green chain), enhancement of green / blue infrastructure is encouraged. Developers will be encouraged to explore the use of canal water as a low carbon energy source. Developers will be required to carry out a flood risk assessment and mitigations put in place if necessary. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			

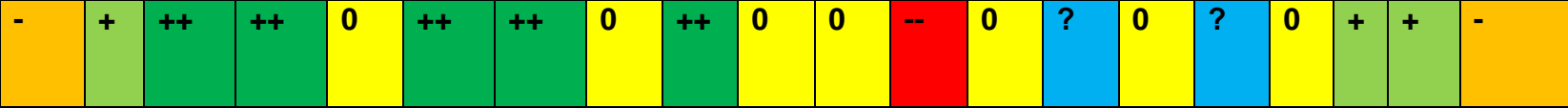
Atlip Road (BSWSA3)	-	+	++	++	++	++	-	0	+	0	0	--	0	?	0	0	+	+	-	-
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. The site is within close proximity to Alperton town centre and therefore has access to a wide range of essential facilities with the exception of schools.</p> <p>Redevelopment should ensure the re-provision of the commercial units along Ealing road, maintaining an active retail frontage at ground floor level.</p>								<p>The site benefits from immediate proximity to Alperton Tube Station and therefore has a relatively high PTAL of 4. This should facilitate car free development which will help reduce local traffic and pollution. The site borders railway tracks to the west which are a designated Wildlife Corridor. Efforts should be made to integrate this into development proposals, increasing green infrastructure along this edge in particular. Helping reduce potential for flooding in the process.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			

Sunleigh Road (BSWSA4)	-	+	++	++	++	++	-	0	-	0	+	--	--	?	0	0	+	+	-	-
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. The site is well provisioned in terms of facilities, being within relatively close proximity to Alperton town centre. The site is over 500m from the nearest primary school, however, the site is near the borough boundary and may be served in this respect by the neighbouring borough of Ealing.</p> <p>Redevelopment of the site will incur a loss of mixed use employment floorspace. Re-provision of this flexible/affordable floorspace should be sort upon redevelopment.</p>								<p>The site has a low PTAL rating, unlikely to rise sufficiently to facilitate car free development. This will increase the likely car dependence of residents on site, increasing associated traffic and pollution. The site backs onto the Grand Union canal and therefore represents an opportunity to enhance a watercourse. Development should focus on its integration with the canal, increasing levels of green infrastructure and accessibility from the public. The site also includes a Site of Archaeological Importance. Therefore, developers should provide a detailed analysis and justification of the potential impact of the development on the heritage asset.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. The site is not within close proximity to schools, however, due to its proximity to the borough boundary it may be served by facilities in the neighbouring borough. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage</p>																			

	and emissions. This development can enhance the adjacent watercourse by contributing to planting. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Abbey Manufacturing Estate (BSWSA5)	-	+	++	++	++	++	++	0	-	0	+	--	--	?	0	0	+	+	-	-
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. The site is within close proximity to Alperton town centre and therefore has access to a wide range of essential facilities including healthcare, schooling, and sports/open spaces.</p> <p>The site is currently used for light industrial purposes which redevelopment should look to retain on ground floor units, minimising loss of industrial/employment floorspace, enhancing where possible.</p>										<p>Although the site is within reasonable proximity to Alperton tube station, it still only has a PTAL of 2, however, given the level of development within the Alperton Growth Area, it should hopefully increase along with local investments. With a low PTAL the site is likely to require parking facilities and will therefore increase car dependence on site, adding to the associated traffic and pollution in the area. The sites southern boundary is adjacent to the Grand Union canal and therefore represents an opportunity to enhance a watercourse, improving its integration with nature and the wider public realm. There are minor surface water flooding concerns near the southern boundary which should be easily mitigated by increasing permeability with higher levels of green infrastructure associated with the natural enhancement of the watercourse.</p>									
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This development can be																			

	centred around enhancing the on-site watercourse w by contributing to naturalisation. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Beresford Avenue (BSWSA6)	-	+	++	++	++	++	++	0	-	0	+	--	--	?	0	0	+	+	-	-
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. Redevelopment will reactivate frontages onto Beresford Avenue, increasing passive surveillance and reducing crime. The site is well provisioned with regards to essential facilities, having good accessibility to healthcare, schooling, and sports/open space.</p> <p>Given that the site is existing industrial land, no let loss and re-provision of industrial floorspace will be sought.</p>								<p>The site has a low PTAL rating, unlikely to rise sufficiently given surrounding intensification to facilitate car free development. This will increase the likely car dependence of residents on site, increasing associated traffic and pollution. The site backs onto the Grand Union canal and therefore represents an opportunity to enhance a watercourse. Development should focus on its integration with the canal, increasing levels of green infrastructure and accessibility from the public.</p>											
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This development can enhance integration with the adjacent watercourse by contributing to naturalisation. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			

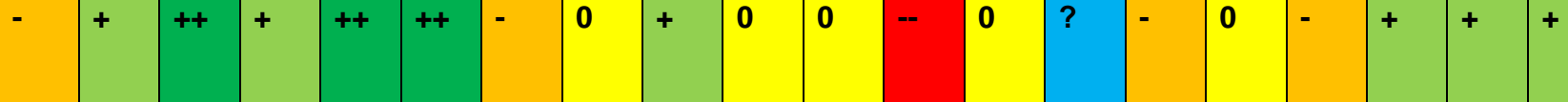
Northfields (BSWSA7)																		
	<p>The site is not within a London Strategic Area for regeneration, however, it is located within an area of high crime. The site is well served by facilities such as open space, distance to services and facilities and schooling but performs poorly in terms of access to healthcare. The site is allocated for mixed-use residential-led development (approximately 2900 dwellings).</p>								<p>The site has a low PTAL rating of between 0-3 (2031 estimate), however, this may be revised in light of new development. Development should aim to be air quality positive as the site is located within an Air Quality Management Area (AQMA) and within a Growth Area. The Grand Union Canal and River Brent run adjacent to parts of the site, and the site is also adjacent to a green chain and a wildlife corridor (Grade II SIN). The south of the site is categorised as Flood Zone 3a and 3b and susceptible to surface water, fluvial and tidal flooding and groundwater flooding.</p>									
	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria, with some negative impacts. As the site is adjacent to the Grand Union Canal and River Brent, enhancement of green / blue infrastructure is encouraged. Developers will be required to carry out a flood risk assessment and mitigations put in place if necessary. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>																	
Wembley High Road (BSWSA8)																		
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is within an area which is subject to high crime rates and therefore should benefit greatly from redevelopment. The site is within Wembley town centre and therefore has access to a</p>								<p>The site has a high PTAL which should facilitate car free development, reducing associated traffic and carbon emissions. The site is bound in the north by railway tracks which are designated a Wildlife Corridor and a Grade I Site of Importance for Nature Conservation. Developments should look to enhance this asset, integrating additional green infrastructure into this section of the site, seeking not to compromise the habitats</p>									

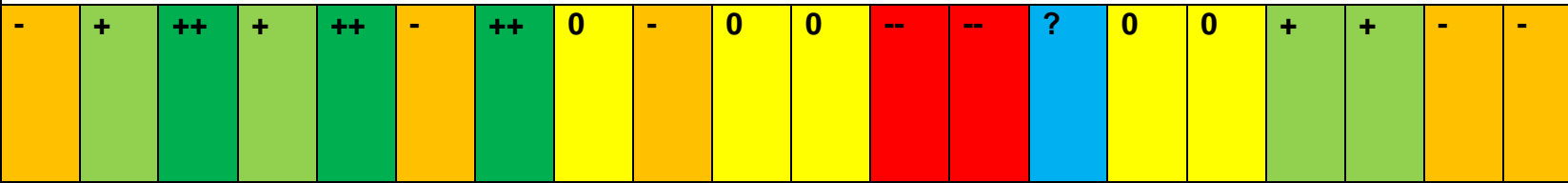
	<p>wide range of facilities including healthcare, schooling, and sports/open space.</p> <p>The site currently contains units which represent some of Wembley town centres primary frontage. Redevelopment should therefore not result in a net reduction of commercial floorspace.</p>	<p>function as a wildlife corridor. The site also includes a Site of Archaeological Importance. Therefore developers should provide a detailed analysis and justification of the potential impact of the development on the heritage asset.</p>
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. Part of the site is within a designated nature reserve which should be enhanced for wildlife upon redevelopment. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.</p>	
Former Copland School (BSWSA9)		
Comments	<p>The site is not within a London Strategic Area for Regeneration, neither is it within an area which experiences high crime rates. Well served by essential facilities, the site has good access to healthcare, schooling, and sports/open space.</p> <p>The site has potential to help link up the public domain of the newly redeveloped Wembley Park area with the retail units along Wembley High Road through an improved commercial frontage and public realm.</p>	<p>The site has an exceptional PTAL rating of 6a, being within close proximity to numerous train stations and bus stops. This will go a long way toward facilitating a car free development which will not contribute negatively toward local traffic and air quality. The site has minor surface water flooding concerns which should be easily mitigated through the incorporation of SUDS.</p>

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			
Elm Road (BSWSA10)	-	+	++	++	++	++	++	+	+	0	0	--	0	+	-	0	0	+	+	-
Comments	The site is not within a London Strategic Area for regeneration, however, it is located within an area of high crime. The site is well served by facilities such as open space, distance to services and facilities, distance to schooling and healthcare. The site is allocated for mixed-use residential-led development (approximately 400 dwellings), including hotel and community facilities.									The site has a high PTAL rating, which should facilitate car free residential development, reducing car dependence and its associated traffic and air pollution. The site is within an AQMA and should aim to be air quality positive due to being in the Wembley Growth Area. The site is bordered in the west and north by the Grade I Chiltern Railway line SINC linking a number of wildlife sites. Part of the site is susceptible to surface water flooding.										
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with good accessibility to a range of essential infrastructure. Mixed effects are predicted against environmental criteria, but mostly neutral. The site scores negatively against air quality as it is within an AQMA The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. Development should adhere to London Plan and BG11 requirements for the protection and enhancement of wildlife corridors. Developers will also be required to carry out a flood risk assessment and mitigations put in place if necessary. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.																			

Wembley Cutting North, Mostyn Road (BSWSA11)	-	+	++	+	++	++	++	0	+	0	0	--	0	?	-	0	-	+	+	+	
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site has good access to a wide range of goods and services being within immediate proximity to Wembley Central Town Centre, including key infrastructure such as healthcare and schooling.							The site has a good PTAL of 4 which should facilitate the implementation of a car free development, reducing associated traffic and pollution, improving air quality for which the site scored negatively. The site forms part of the railway trackside and is designated both as a Wildlife Corridor and a Grade I SINC. Development should be sympathetic to the ecological value of the site and adjacent greenspace which is also designated. The incorporation of green infrastructure within the design of the development will be essential in order to integrate the surrounding natural utility.													
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. Negative impacts are associated with the development of greenfield land which is designated as a Wildlife Corridor. Developments should ensure ecological utility of the site and the railway track wildlife corridor is not reduced, enhancing value where possible. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																				
Keelers Service Centre, Harrow Road, Wembley, HA0 2LL (BSWSA12)	-	+	++	+	++	++	-	0	+	0	0	--	0	?	0	0	+	+	+	-	

Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site has good access to a range of amenities being within Sudbury Town Centre, with healthcare and sporting facilities within walking distance. The site is not within close proximity to a primary school with the nearest school being further than 500 meter away, therefore scoring negatively.	The site has a good PTAL of 4 being within close proximity to Sudbury and Harrow Road Station which should facilitate the implementation of a car free development, reducing associated traffic and pollution, improving air quality for which the site scored negatively. The site forms part of the Sudbury Neighbourhood Plan area. Development will therefore need to be in conformity with this, with any redevelopment proposals considering this forum.																				
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of schooling, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																					
Wembley Police & Fire Stations Harrow Road and Wembley Community Hospital/Chaplin Road Health Centre (BSWSA13)	<table border="1" style="width:100%; text-align:center; border-collapse: collapse;"> <tr> <td style="width:5%;">-</td><td style="width:5%;">+</td><td style="width:5%;">++</td><td style="width:5%;">+</td><td style="width:5%;">++</td><td style="width:5%;">++</td><td style="width:5%;">++</td><td style="width:5%;">0</td><td style="width:5%;">+</td><td style="width:5%;">0</td><td style="width:5%;">0</td><td style="width:5%;">--</td><td style="width:5%;">0</td><td style="width:5%;">?</td><td style="width:5%;">0</td><td style="width:5%;">?</td><td style="width:5%;">+</td><td style="width:5%;">+</td><td style="width:5%;">+</td><td style="width:5%;">-</td> </tr> </table>		-	+	++	+	++	++	++	0	+	0	0	--	0	?	0	?	+	+	+	-
-	+	++	+	++	++	++	0	+	0	0	--	0	?	0	?	+	+	+	-			
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. Being within equidistance to both Sudbury and Wembley	The site has a mixed PTAL with the majority of the site be designated as 6, with some sections designated 5, 4 and 2. Residential elements of the site should therefore aim to be car free, reducing associated traffic and pollution, improving air quality for																				

	<p>Central Town Centres, the site is well serviced with a range of goods and services, including key infrastructure such as the on-site health centre and a local primary and secondary school.</p> <p>Current uses to be retained and improved with a focus on reconfiguring the site to access more of its utility.</p>	<p>which the site has scored negatively. The Police Station is a local heritage asset which should be retained if possible, with works being undertaken to enhance the utility of this asset. The site has some minor surface water flood concerns around the existing hospital building which may be easily overcome using appropriate design techniques.</p>																		
Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. The on-site Grade II* listed heritage asset should be retained if possible, reducing any associated negative impact to local character, with the integration of new development to be sympathetic toward its design. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
Sudbury Town Station Car Park (BSWSA14)																				
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site is well served by a range of goods and services by virtue of its proximity to Sudbury Town Centre, this also includes the provision of healthcare. The site has scored negatively against proximity to schools, however, the site is located on the</p>	<p>Being within immediate proximity to Sudbury Town Station, the site has a good PTAL which should facilitate the implementation of a car free development, reducing associated traffic and pollution, improving air quality for which the site has scored negatively. The site is adjacent to the railway tracks and constitutes part of a wildlife corridor. Any development on site should be sensitive to this fact, being sure not to reduce the ecological value of the corridor, integrating this natural utility into the sites redevelopment.</p>																		

	borough boundary and may therefore be served by facilities within the neighbouring borough.	The Station building itself is a Grade II* designated heritage asset. Development should take this into consideration, using the character of this building to help guide any new builds.
Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, with the exception of schooling, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site's good PTAL score means car dependency should not be increased by occupants. Negative impacts are associated with the development of greenfield land which is designated as a Wildlife Corridor. Developments should ensure ecological utility of the site and the area of the railway track wildlife corridor are not reduced, enhancing value where possible. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.	
Employment Land On Heather Park Drive (BSWSA15)		
Comments	The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site is not within close proximity to a town centre but is within immediate proximity to other strategic employment sites. There are healthcare and schooling facilities within walking distance of the site.	The site has a relatively poor PTAL rating of 2 and 3 which suggests redevelopment may require the provision of parking facilities which will increase car dependence, and associated traffic and pollution, reducing air quality for which the site has scored negatively. The site may benefit from the development of the Northfields site to the south which is set to improve links to Stonebridge Station, potentially increasing the PTAL for this site.

Conclusion	Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.																			
Carphone Warehouse 416 Ealing Road (BSWSA16)	-	-	++	++	++	-	-	0	+	--	0	--	0	?	0	0	+	+	-	-
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site should provide a significant uplift in residential units. The site is not within close proximity to a town centre, healthcare and schooling facilities. However, the site is within close proximity to the borough boundary and may be served by facilities in the neighbouring borough.</p> <p>The retail floorspace which is currently on site does not require to be retained entirely, with the primary aim of the site to be residential.</p>										<p>The site has a good PTAL rating of 5 which should facilitate the implementation of a car free development, reducing associated traffic and pollution, improving air quality for which the site has scored negatively. The site is within 300 metres of the Veolia Transfer Station on Marsh Road. Development should therefore take this into consideration, using appropriate design techniques to mitigate any negative impacts associated with this proximity.</p>									

Conclusion	<p>There are mixed impacts associated with social criteria. Positive impacts are anticipated due to the delivery of significant levels of housing in an area helping associated with high levels of crime, with access to open space and sporting facilities. Negative impacts are associated with low levels of access to key infrastructure such as town centres, healthcare and schooling. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. The site is within close proximity to a waste transfer station; negative impacts associated with this will need to be mitigated through appropriate design techniques. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.</p>																			
Former Wembley Youth Centre/Dennis Jackson Centre London Road HA9 7EU (BSWSA17)	-	+	++	++	++	++	++	0	--	0	0	--	--	+	0	0	+	+	+	-
Comments	<p>The site is not within a London Strategic Area for Regeneration, however, it is subject to high crime rates. The site should help bring forward approximately 150 residential units. The site is within close proximity to Wembley Central Town Centre and has good access to a range of goods and services, including healthcare and schooling.</p> <p>Redevelopment should ensure the re-provision of the community floorspace.</p>								<p>The site has a mixed PTAL of 1b, 3 and 4 and may therefore require the provision of parking facilities, increasing car dependence, and associated traffic and pollution, decreasing air quality for which the site has scored negatively. The surrounding land primarily consists of open space and should not be overshadowed under redevelopment.</p>											

Conclusion	<p>Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of new housing in an area with good accessibility to a range of essential infrastructure, helping direct investment toward an area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). This problem is exacerbated by the sites relatively low PTAL which is anticipated to increase vehicle dependence and associated traffic and pollution as it will likely require parking facilities. The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions. In summary, development will increase intensity of use and potential negative impacts can be mitigated and wider sustainability benefits achieved.</p>
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Appendix 1 - Baseline Information

1. Population and Equality

Evidence:

- 2001 and 2011 Census
- GLA Population Projections (Short-term), GLA, 2016
- GLA Population by Country of Birth, GLA, 2018
- GLA Housing lead ethnic group projections, GLA, 2016
- The Brent Joint Strategic Needs Assessment (JSNA), 2015
- London Borough of Brent Strategic Housing Market Assessment (October 2018)
- Equality Profile of Brent, Brent Open Data, 2019
- Population Change in Brent, Brent Open Data, 2019

Evidence Gaps

- None identified

- 1.1. The 2011 Census recorded Brent's population as 311,215, a 19.1% increase from the previous Census in 2001. Since the 2011 Census, the borough's population has continued to grow, with it estimated to be 335,300 as at 2019¹, which equates to a 7.2% increase since 2011. The current population density of the borough is 7652 people per square km. The population is expected to continue to increase to 2050, with it estimated that that by 2050 the population will be approximately 407,800², an increase of 20.25% from 2019.
- 1.2. The 2011, and estimated 2019, 2041 and 2050 ward populations are detailed in Table 12. In 2019, the most populated wards within the borough are Stonebridge, Queensbury, Tokyngton and Kilburn. The least populated wards within the borough in 2019 are Brondesbury Park, Northwick Park, and Kenton. In 2050, it is predicted that the most populated wards within the borough will be Alperton and Tokyngton, and the least populated wards will be Brondesbury Park, Welsh Harp and Kenton.²

¹Population Change in Brent, Brent Open Data, 2019

Ward	2011	2019	2041	2050
Alperton	14094	17200	29230	30688
Barnhill	15916	16650	19420	20263
Brondesbury Park	13097	13750	12847	13593
Dollis Hill	13504	14800	14154	14639
Dudden Hill	13504	16000	20241	21146
Fryent	13527	14650	15459	16087
Harlesden	17724	16950	16378	16979
Kensal Green	15013	15450	16297	17112
Kenton	12199	12400	14186	14767
Kilburn	17096	18550	18064	19151
Mapesbury	15621	16500	16295	17264
Northwick Park	12873	12800	15994	16895
Preston	15566	16300	17620	18385
Queens Park	15385	16300	14620	15520
Queensbury	15238	19600	22580	23541
Stonebridge	17007	19400	23039	23836
Sudbury	15044	16450	16529	17630
Tokyington	15188	18500	46057	47863
Welsh Harp	13840	14350	13708	14292
Wembley	14816	17300	21163	22087
Willesden	15686	16850	16185	17127

Table 12: Ward Populations

Gender

1.3. In 2019, 51% of Brent's population was male and 49% was female. As shown in Figure 4, it is predicted that there will no significant change in the borough's gender balance up until 2051.²

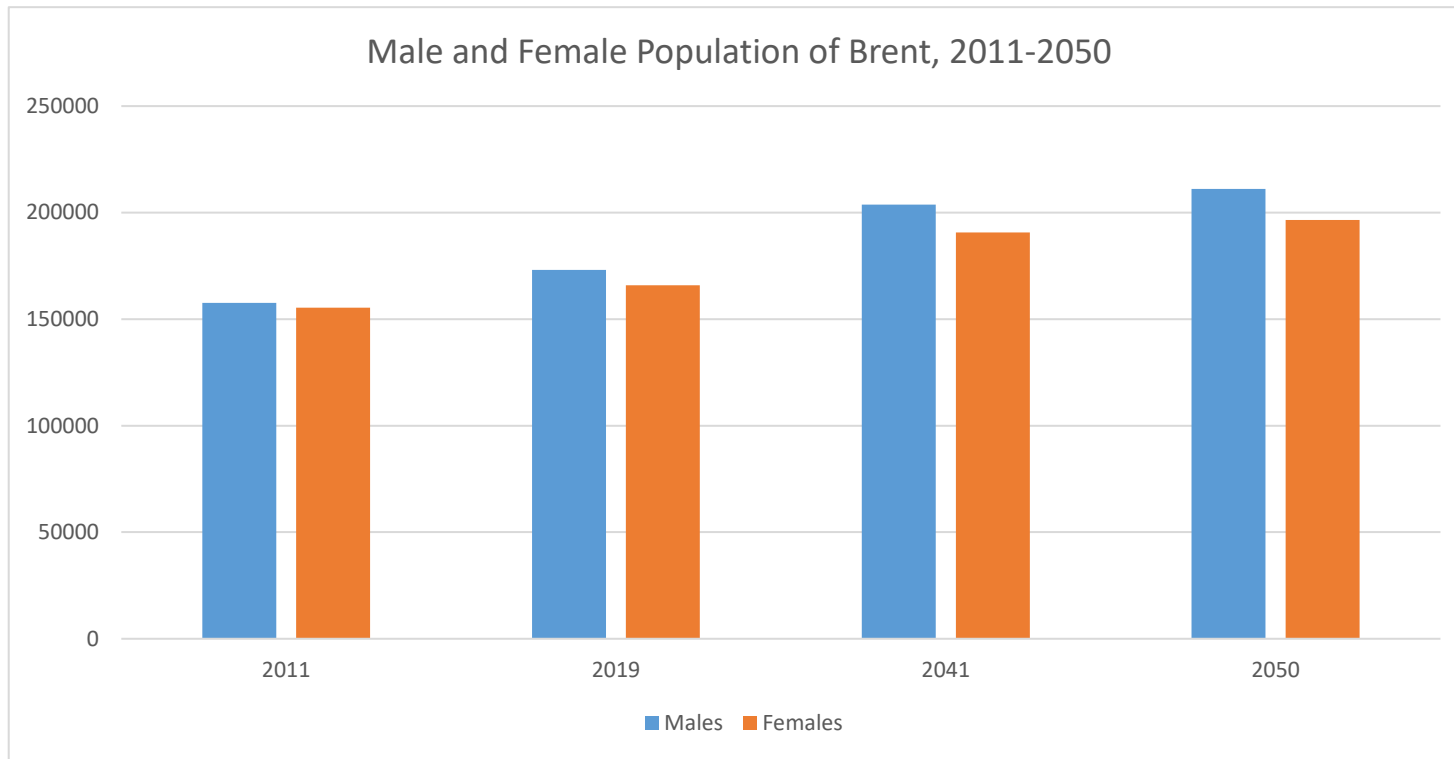


Figure 4: Male and Female Population within Brent

² GLA short term population projections, 2016

Age

1.4. Brent has a young population, with 32.4% aged between 20 and 39. This corresponds with London as a whole, which has a much higher proportion of its population within the age range of 25-34 than the rest of England. The working age (16-64 years) population of makes up 66.6% of the borough's population.³

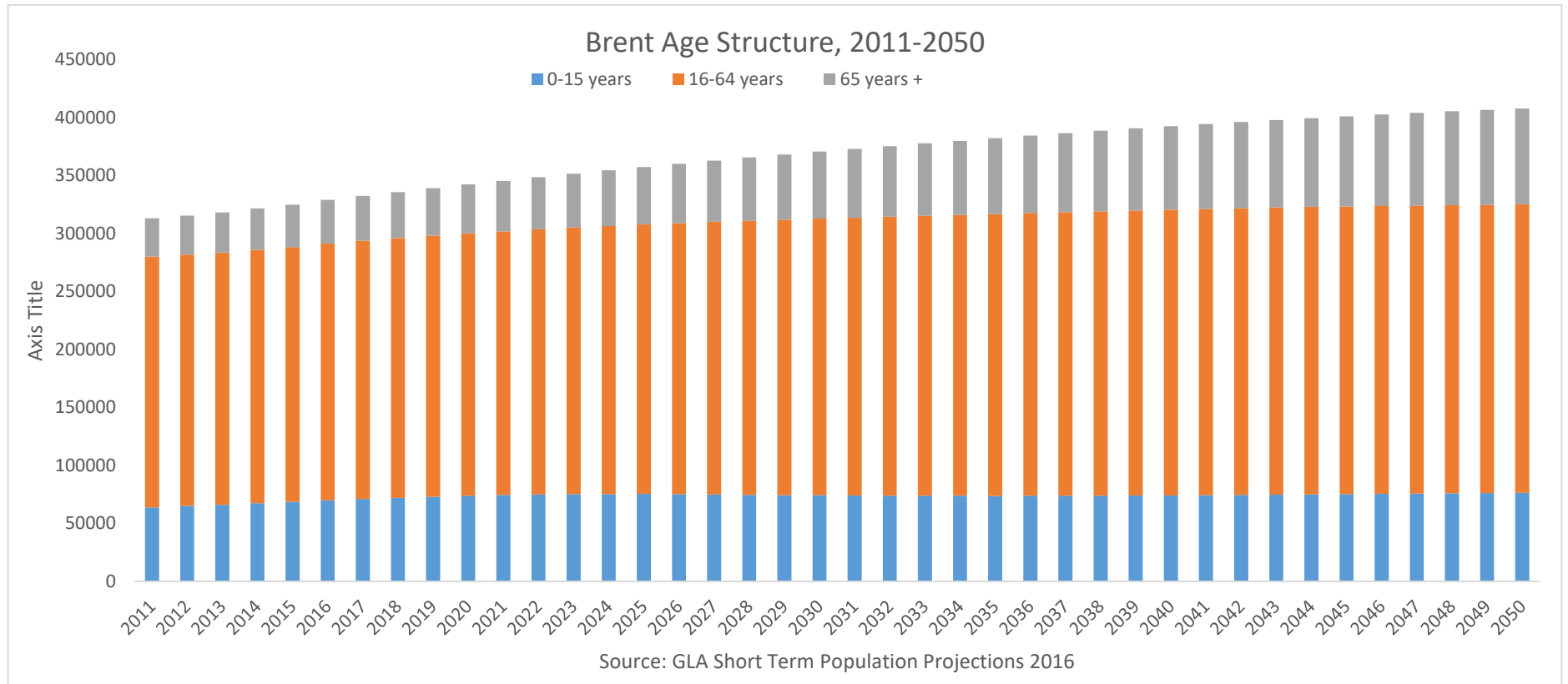


Figure 5: Brent's Age Structure, 2011-2050

³ GLA short term population projections, 2016

1.5. As at 2019, the 65 and over population (approximated to be 40,900 in total) makes up approximately 12.06% of Brent’s population⁴. The 2018 SHMA stated that “whilst the increase in people aged 65+ represented is almost half of the overall population growth (46%), the increase in people aged 65+ represents over half (57%) of the household growth: 22,600 households out of the 39,500 total”. This point is supported by the projected age structure of Brent in 2050.

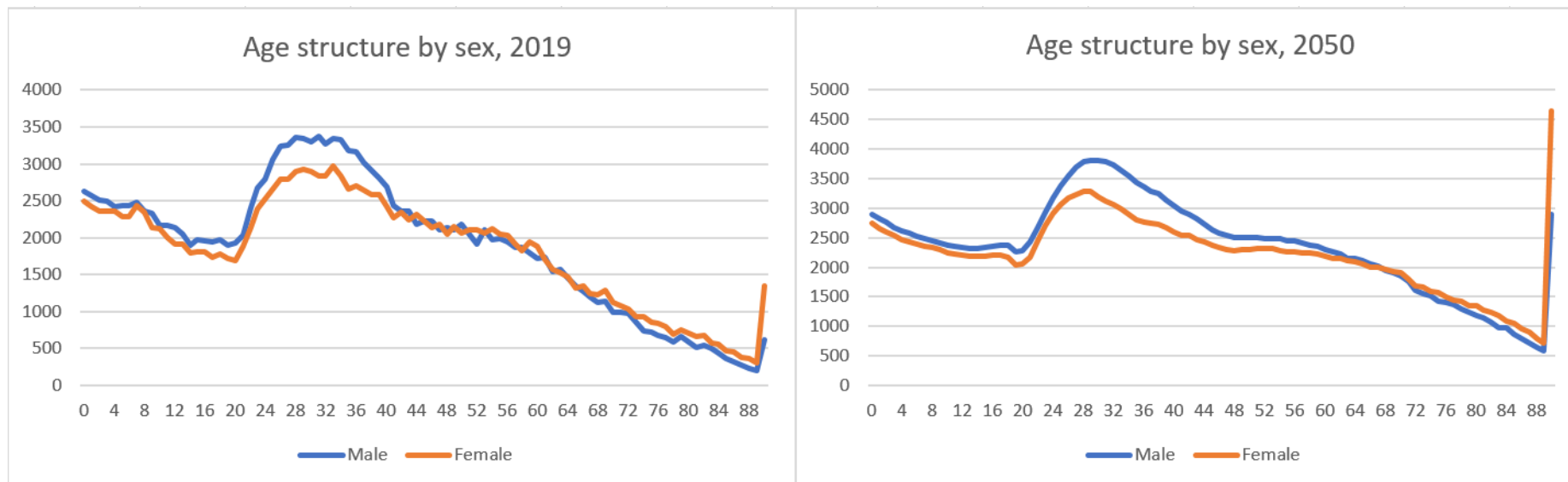


Figure 6: Brent’s age structure, 2019-2050

Sexual Orientation

1.6. There is currently no single, widely accepted measure of the size of the Lesbian, Gay or Bisexual population in Britain and estimates vary considerably. According to the 2017 GP Patient Survey, 4.6% of Brent adults surveyed identified as Lesbian, Gay, Bisexual or Other. This percentage is below the London average (5.4%) but above the England average (3.3%). A recent study by Public Health England modelled estimates of the size of the LGB population based on data from 15 studies,

⁴ GLA short term population projections, 2016

and concluded that the percentage of LGB adults was at least 4.3% in London, with this figure to be considered a minimum.⁵

Gender Reassignment and Gender Identity

1.7. Statistics around transition and gender identify are limited. Estimates from the Gender Identify Research Education Society are that around 0.02% of adults may have undergone transition, or are receiving treatment (0.03%), and that 0.2% may seek treatment in the future. According to the Government Equalities Office, there are approximately 200,000 to 500,000 transgender people in the UK. This would equate to between 0.3-0.8% of the population in 2018. In Brent, this would equate to between 1000 to 2700 people.⁶

Pregnancy and Maternity

1.8. Brent has relatively high birth and fertility rates. In 2017, there was a birth rate of 15.8 births per 1000 population compared to 14.3 across London and 11.6 across England and Wales. This equates to the 4th highest birth rate in London and 6th highest in England and Wales. Additionally, Brent has a high total fertility rate (the number of children likely to be born to a woman in her lifetime if she were subject to the prevailing rate of fertility in the population). Brent has a Total Fertility Rate of 2.08 children, compared to 1.70 in London and 1.76 across England. This places Brent the third highest in London and 17th highest nationally.⁶

Marriage and Civil Partnership

1.9. According to the 2011 Census, as at 2011, 43% of Brent residents were married and 0.3% were in a civil partnership. Remaining residents were single (42%) or separated, divorced or widowed (14%). The proportion of residents in a civil partnership was lower than the London average of 0.4% and higher than the England average of 0.2%. There has been a decline in the number of people of the opposite sex getting married between 2012 and 2015, down from a high of 1681 to 931. This is in line with national trends. Of the 960 partnerships formed in 2015 in Brent, 3% were same sex marriages or civil partnerships, equating to 29. This 29 consisted of 23 same sex marriages and 6 civil partnerships. This is the same as the national percentage (3%), but lower than the London percentage (5%).⁶

⁵ Equality profile of Brent, Brent Open Data, 2019

⁶ Equality profile of Brent, Brent Open Data, 2019

Ethnicity

1.10. Brent is one of the most diverse local authority areas in the UK. In 2019, approximately 64.5% of Brent's population is Black, Asian or other minority ethnicity (BAME). This has increased since 2011, when BAME groups made up 63.7% of the population. The largest ethnic group within the borough is Indian, which consists of 17.4% of the population, followed by Other White (16%) and White British (15.9%) of the population.⁷

1.11. In 2018, it was estimated that 52% of the borough's population was born abroad. 15.2% were born in countries within the European Union, 20.67% for Asia and 15.2% from the rest of the world. Since 2007, there has been a slight decline in the proportion of the borough's population who were born outside of European Counties; in 2007 40% of the population born outside of the UK were born in non-European counties, compared to 36.78% in 2018. There has been an increase in the proportion

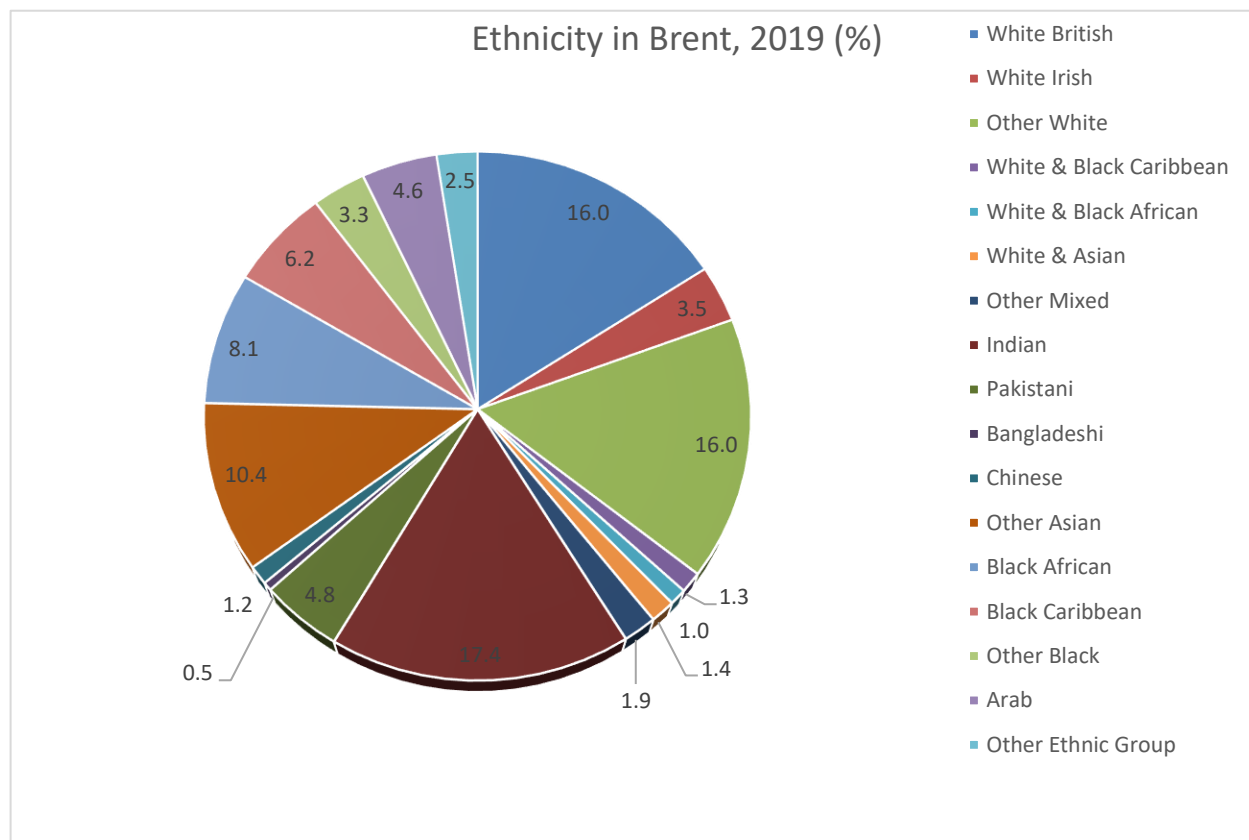


Figure 7: Ethnicity in Brent, 2019

⁷ GLA housing-led ethnic group projections, 2016

of the borough's population born within European countries; in 2007 10.99% of the population born outside of the UK were born in countries within the European, compared to 15.21% in 2018.⁸

1.12. The increasing population is likely to create changes in the ethnic make-up of the borough. As shown in Figure 8, it is predicted that large population increases within the borough will be within the 'Other White' and 'Other Asian' ethnic groups. It is also forecasts that there will be a slight decline in the borough's Black Caribbean and White Irish population.⁹

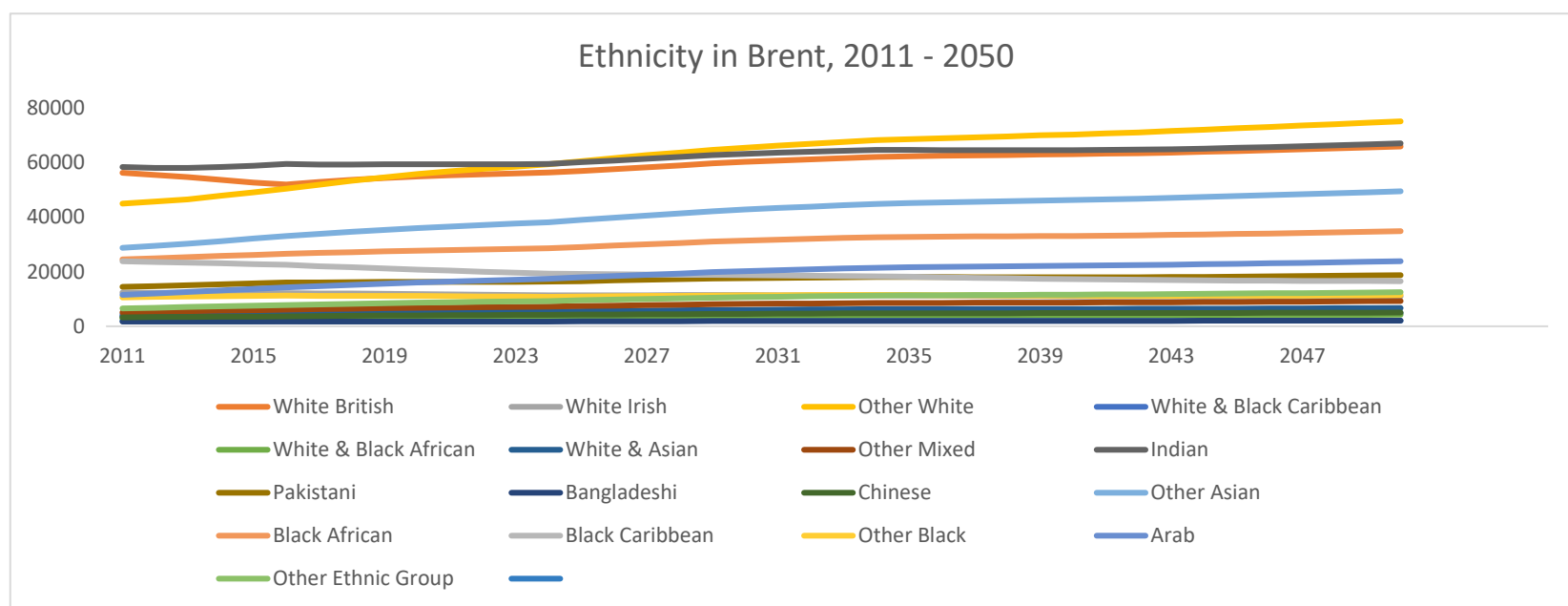


Figure 8: Ethnicity in Brent, 2011-2050

⁸ GLA population by country of birth, 2018

⁹ GLA housing-led ethnic group projections, 2016

- 1.13. There are 149 languages spoken in Brent. English is the main language for 62.8% of the population. Gujarati is the main language for 7.9% of the population and Polish is the main language for 3.4% of the population. Nearly 11% of adults speak English as their first language at home¹⁰.
- 1.14. According to the 2011 Census 14% of Brent residents had a long-term health problem or disability that limited their day-to-day activities in some way. More than half of all residents aged over 65 had a long term limiting health problem compared to 3% of children.
- 1.15. More recent survey data suggests that 16% of Brent residents between the ages of 16-64 are disabled according to the Equality Act 2010 and / or work-limiting definition. The prevalence of disability in Brent is similar to the London average (16% but lower than the national average (20%). This may be reflective of the fact that Brent and London populations have a younger age profile compared with Great Britain.¹¹

Religion or Belief

- 1.16. At the time of the 2001 Census, 48% of Brent's population stated that their religion or belief was Christianity. Although Christianity remained the most popular religion/belief in the borough in 2011, the percentage of the population that stated it was their religion had decreased by 7% to 41%.
- 1.17. Between 2001 and 2011, there was an increase in the amount of residents who stated that their religion or belief was Islam. As a result of this 7% increase from 12% to 19%, it replaces Hinduism as the second most popular religion/belief in the borough. During the same time period, there was a 2% decrease to 1% in the amount of residents who stated that their religion/belief was Judaism.
- 1.18. Compared with other areas, residents of Brent are more likely to have a religion. In Brent, 82% had a religion, compared to 71% across London and 68% nationally. This is the 4th highest rate in England and Wales. Just 11% had no religion.¹²

¹⁰ 2011 Census, ONS

¹¹ Equality profile of Brent, Brent Open Data, 2019

¹² Equality Profile of Brent, Brent Open Data, 2019

2. Education

Evidence Base

- Joint Strategic Needs Assessment, 2015
- Annual School Standards and Achievement Report 2017-2018
- Brent School Place Planning Strategy 2019-2023
- Statistics at Department for Education – Statistic: special education needs (SEN)
- Gov.uk data – All Schools and Colleges in Brent (2017-2018)
- Schools, Pupils and their Characteristics, Department for Education, January 2019

Infrastructure

2.1. As of March 2018, Brent's schools are organised as follows:

Type of School	Nursery	Primary	Secondary	All-through	Special	Pupil Referral Unity	Total
Maintained Community	4	31	0	0	2	2	39
Maintained Voluntary-aided	0	18	2	0	0	0	20
Maintained Foundation	0	2	0	0	0	0	2
Sponsored Academy	0	4	3	1	0	0	8
Converter Academy	0	4	7		2	0	14
Free School	0	1	1	0	0	0	2
Total	4	60	13	2	4	2	85

Table 13: Summary of Brent's Education Provision

2.2. The Brent School Place Planning Strategy states that Year 7 forecasts against current capacity identifies that an additional 13 forms of entry are needed to meet demand, with a need for additional capacity from 2019/20. The 'North Brent' Free School, planned to open in 2020, will help to meet demand until 2022/23, when a further 4 forms of entry will be required. The strategy suggests that this pattern suggests that expanding provision in existing secondary schools is the best option to meet additional capacity required beyond the 'North Brent' Free School.

School Population

2.3. Brent's school population has increased from 44,117 in 2011 to 51,524 in the year 2017-2018¹³. This represents an increase of 16.8%. In previous years, Brent has seen an unprecedented increase in the demand for primary school places, but as highlighted within the Brent School Place Planning Strategy, the trend changed in 2017 when the number of children admitted to Reception decreased for the first time in 11 years. Reception intakes are due to decrease further until 2021/22, when they will start increasing again.¹³The demand for primary school places to 2023/2024 is detailed in Figure 9.

¹³ Gov.uk – Data on all schools and colleges in Brent, 2017-2018

		Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
2018/2019	Capacity	4,247	4,132	4,187	4,214	4,062	3,887	3,977
	Projections	3,706	3,671	3,802	3,882	3,789	3,673	3,694
	surplus/deficit	541	461	385	332	273	214	283
2019/2020	Capacity	4,277	4,247	4,132	4,217	4,214	4,062	3,887
	Projections	3,719	3,674	3,642	3,830	3,852	3,759	3,633
	surplus/deficit	558	573	490	387	362	303	254
2020/2021	Capacity	4,277	4,277	4,247	4,132	4,217	4,214	4,062
	Projections	3,707	3,676	3,634	3,638	3,792	3,813	3,710
	surplus/deficit	570	601	613	494	425	401	352
2021/2022	Capacity	4,277	4,277	4,277	4,247	4,132	4,217	4,214
	Projections	3,666	3,675	3,643	3,640	3,614	3,755	3,766
	surplus/deficit	611	602	634	607	518	462	448
2022/2023	Capacity	4,277	4,277	4,277	4,277	4,247	4,132	4,217
	Projections	3,727	3,675	3,673	3,679	3,643	3,609	3,735
	surplus/deficit	550	602	604	598	604	523	482
2023/2024	Capacity	4,277	4,277	4,277	4,277	4,277	4,247	4,132
	Projections	3,798	3,738	3,678	3,712	3,683	3,642	3,593
	surplus/deficit	479	539	599	565	594	605	539

Figure 9: Demand for Primary School Places 2018-2024 (Brent School Place Planning Strategy, 2019-2024)

2.4. Furthermore, the Strategy identified there has been a significant increase in demand for secondary school places since 2016, with the increased demand at primary stage now starting to move through to the secondary phase. Year 7 intakes are forecast to increase up until 2023/2024. Intakes are then set to reduce, although intakes will still remain higher than 2018/2019. As shown in Figure 10, by 2023/2024 an additional 13 secondary forms of entry will be required to meet

demand. The 'North Brent' Free School, due to open in 2020, will help to meet increased demand, and the pattern of demand suggests that expanding provision in existing schools is the best option to meet demand beyond the 'North Brent' Free School.

Year	Year 7 projected intake	Year 7 places available	Surplus/ Deficit of places	Surplus/ deficit %	Additional Forms of Entry (FE) required to ensure 5% spare places	Additional FE required with North Brent Free School providing 6FE from 2020	Cumulative FE required assuming places are provided as needed to meet demand
2018/19	3310	3478	168	5%	0	0	0
2019/20	3386	3508	122	3%	2	2	2
2020/21	3450	3508	58	2%	4	0	0
2021/22	3564	3508	-56	-2%	8	2	0
2022/23	3684	3508	-176	-5%	12	6	4
2023/24	3703	3508	-195	-6%	13	7	1
2024/25	3591	3508	-83	-2%	9	3	0
2025/26	3592	3508	-84	-2%	9	3	0
2026/27	3624	3508	-116	-3%	10	4	0

Figure 10: Demand for Secondary School Places

Educational Attainment

2.5. As identified within the Annual School Standards and Achievement 2017-2018, 96% of Brent Schools were judged good or outstanding, the same as in 2016-2017. This means that Brent is ten percentage points about the national average of 86%, and four percentage points above the London average of 92%. All nurse, special schools and pupil referral units were judged as being at least good.

Primary

2.6. In 2018:

- The proportion of pupils attaining the expected standard in reading, writing and mathematics at the end of Key Stage 2 was 63%, slightly below the London and national average;
- Similar to the last two years, Key Stage 2 average progress within the borough is above the national averages for reading, writing and mathematics, and above the London average for mathematics;
- A key issue continues to be the wide variation in the attainment of pupils at different primary schools, with the difference between the school with the highest proportion of pupils attaining the headline measure and the lowest being 74 percentage points.
- The Brent average for the proportion of girls attaining the expected standard in reading, writing and mathematics at Key Stage 2 was eleven percentage points above boys' attainment. Additionally, boys' attainment was three percentage points below the average for all boys nationally, and girls' attainment was one percentage point above the national average for all girls.¹⁴

Secondary

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

- 2017/18 was the second year that revised GCSEs had been taken in English and Maths, and the first year for a further 20 subjects.

¹⁴ Annual School Standards and Achievement 2017-2018

- In 2017/18, Brent's Progress 8 score was 0.54 – this means that on average, Brent students made over half a grade more in progress in each of their eight subjects than students nationally (-0.02). This is also above the average progress made by students in London (0.17).
- Brent's Attainment 8 score was 49.8 in 2018, above the London average of 46.4. The overall attainment in 2017/18 is lower than in 2016 due to the introduction of the revised GCSE.
- In 2017/18, the Brent average Attainment 8 score for girls was 4.5 points above boys'. Boys' attainment was four points above the average for all boys nationally and continued to be above the national average for all students¹⁵

Post-16 Key Stage 5

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

2.9. In 2018, the average A Level average point score per qualification was 33, slightly lower than 2017. This is higher than the London average (32) and in line with the national average (33). Therefore, on average, Brent students attained a grade C in each of their three A Level subjects.

2.10. Brent students attained an average grade of C (30 points) in Applied General qualifications, which is above both national and London averages (28 and 29 respectively). Applied General qualifications have been revised and their assessment made more challenging, which makes it difficult to compare the 2018 results with previous years.

2.11. For Tech Level courses, Brent's average point score was 36, which is well above the national and London averages (28 and 29 respectively).

¹⁵ Annual School Standards and Achievement 2017-2018

Ethnic Groups

2.12. The largest ethnic groups of statutory school age are: Asian Indian (17%), Black Somali (9%), White Eastern European (9%), Black Caribbean (7%), White British (6%), Asian Pakistani (6%), and Asian Sri-Lankan (3%). Brent schools experience high levels of mobility and in-migration with a large proportion of under 6s born outside of the UK (19%).¹⁶

Special Educational Needs (SEN)

2.13. As of 2018, there were three specialist nurseries, four Special Schools and a number of Additionally Resourced Provisions and SEN Units in both primary and secondary mainstream schools.¹⁶ As identified in the School Place Planning Strategy, the demand for specialist SEN places is increasing in part in proportion to the overall rise in pupil numbers, but also due to increased diagnosis.

2.14. As of January 2018, there were 2076 (SEN2 Return) Brent resident children and young people with an EHCP (Education Health and Care Plans), of whom 1900 were attending a school and 176 were attending a further education provision. 4% of children and young people resident in Brent have an EHCP, compared to 2.9% of the national school-age population.⁴ The most common type of EHCP need within current school age children is Autistic Spectrum Disorder, followed by Moderate Learning Difficulties, and then Speech, Language and Communication Needs.¹⁶

¹⁶ Brent School Place Planning Strategy, 2019-2024

3. Health and Well-Being

Evidence

- Brent Health and Wellbeing Strategy, 2014-2017
- Annual Public Health Report
- A Physical Activity Strategy for Brent, 2016-2021
- Local Authority Health Profiles – Brent, 2019
- Joint Strategic Needs Assessment, 2015
- Childhood Obesity, Community Wellbeing Scrutiny Committee Report, 28 February 2018

Evidence Gaps:

- None identified

- 3.1. In Brent, life expectancy for female between 2016 and 2018 is 85.1 years. This was higher than male life expectancy which is 80.8 years. However, life expectancy across the borough varies for males and females – life expectancy is 6.9 years lower for men and 6.4 years lower for women in the most deprived areas of Brent than in the least deprived areas.¹⁷
- 3.2. At the time of the 2011 Census, the vast majority of people in Brent (83%) described their health as “very good” or “good”, a similar picture to England and Wales as a whole (81%). 5% described their health as “very bad” or “bad”, with the remaining 12% saying that their health is “fair”. At ward level, Kilburn had the highest number of residents who assessed their health as “very good” (8,448 residents) while Kenton had the lowest number of residents (5,502 residents) that assessed their health as “very good”. Harlesden had the highest number of residents with both “good” health (5,815 residents) and those reporting “very bad” health (313 residents)
- 3.3. The Joint Strategic Needs Assessment, which was jointly commissioned by Brent Council and NHS Brent, identified a number of health and wellbeing challenges in the borough, which are:

¹⁷ Local Authority Health Profile – Brent, 2019

- **Low rates of readiness for school amongst under-fives** – In Brent, only 57% of 5-year olds reach a good level of development at age 5, compared to 59% across London.
- **Poor oral health amongst children** –46% of five year olds had one or more decayed, missing or filled teeth. This is worse than the England average of 28%.
- **Rising levels of obesity** – The proportion of obese reception children within Brent in 2017 is higher than the London and England average. The proportion of children who are obese in year 6 in Brent has been increasing since 2013, and remains higher than the London and England average. Figures from the Health and Social Care Information Centre show that in 2017 there were 36 hospital admissions per 100,000 for episodes with a primary diagnosis of obesity, which is significantly higher than the England average of 19. Furthermore, the projected levels of obesity is projected to increase by 50% – between 2014 and 2030 the number of people in Brent aged 65 and over and who are obese is predicted to rise from 9,194 to 13,692.
- **Low levels of participation in physical exercise** – Brent is a borough of low activity and high inactivity. 3 in 10 Brent adults are classified as inactive in the latest release of the Active Lives Survey by Sport England. This is considerably higher than the national average of 25.7%. Out of 326 local authorities that are measured in England, Brent ranked 269th for the proportion of Active People and 283rd for the proportion of inactive people. The Sport England Active Places Small Area Estimates for 2017 show that there are areas of high inactivity in and around the Stonebridge, Alperton, Welsh Harp, Barnhill and Wembley Central wards, with more active areas clustered around the south east of the borough in Queens Park, Brondesbury Park, Kensal Green and Mapesbury. As identified in the Physical Activity Strategy for Brent, there has been some increase in women taking part in sport and exercise between October 2005 and April 2014, however there is still a gap between men’s and women’s participation in sports.
- **Increasing rates of alcohol-related hospital admissions** – The rate of alcohol-related harm hospital stays is 561 per 100,000 population, which is better than the average for England. This is equivalent to 1,554 stays per year. In 2017, the NHS recorded that 109 per 100,000 population had prescription items for the treatment of alcohol dependence, which is lower than the England average of 335 per 100,000.

- **Mental health remains the single largest cause of morbidity within Brent affecting one quarter of all adults at some time in their lives** – In Brent, 33,959 people aged 18-64 were estimated to have a common mental health disorder (CMD) in 2014As shown in Figure 11, by 2030 it is predicted that the number of people with a common mental disorder will increase by 7% to 36,625 people. The Figure shows that there is also greater prevalence of CMD within the female population of the borough compare to the male; in 2014 it was estimated that 20,409 female residents of the borough had a CMD compared to 13,550 male residents.

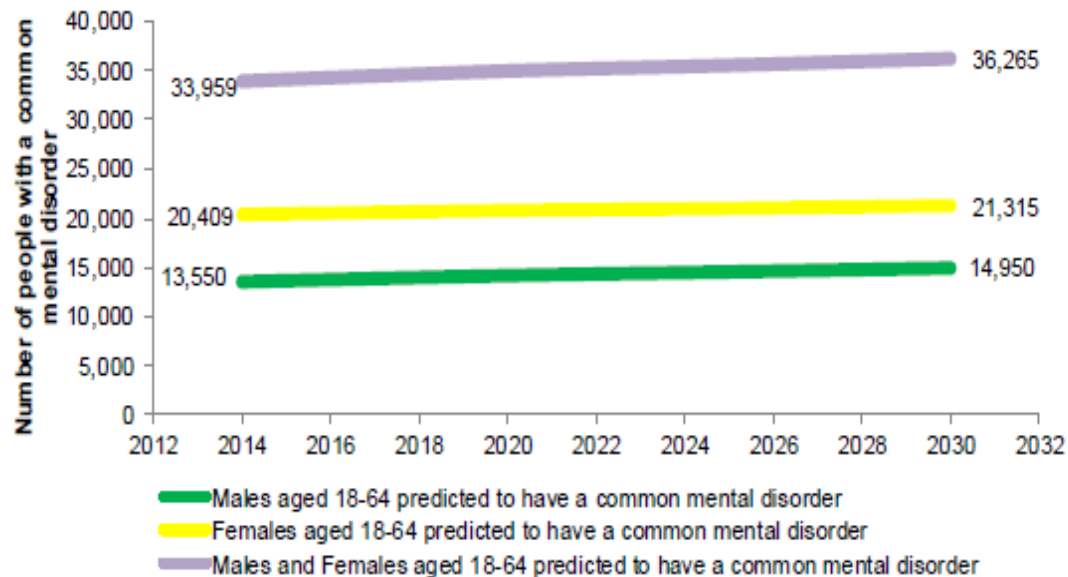


Figure 11: Number of people with a common mental disorder

The prevalence of severe and enduring mental

health (such as schizophrenia, personality disorders and bi-polar) in Brent affects 1.1% of the population, which is above both the London (1%) and England (0.8%) average.

- **Cardiovascular disease, chronic respiratory disease and cancers are the biggest killers in Brent and account for much of the inequalities in life expectancy within the borough**
- **The borough has high levels of long-term chronic conditions, many of which are often related to poor lifestyles, relative deprivation and in some cases ethnic make-up. Diabetes is a good example of such a conditions and the borough** – 10.5% of residents are living with diabetes and are at risk of a range of complications, such as kidney disease, heart disease and loss of sight. The prevalence of diabetes is projected to rise in Brent with it estimated in 2030 that 14% of people aged 16 and over will have diabetes. This is fuelled by the ageing population, increasing numbers of people who are overweight or obese and the high proportion of black and south Asian ethnic groups in the borough who are more at risk of diabetes.
- **The need to increase access to, and to expand, key prevention and screening programmes**

- **Rising levels of dementia amongst older adults** – In March 2015, 1,381 patients (55.1%) in NHS Brent CCG had mild dementia, 818 patients (32.7%) had dementia of a moderate severity, 306 patients (12.2%) had severe dementia and 730 people remained undiagnosed. The prevalence of dementia varied at GP practice levels, ranging from 1.12% to 0.03%. Between 2014 and 2030, the total population age 65 and over in Brent estimated to have dementia is projected to rise from 2,369 to 3,857. This equates to an increase of 63%.

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

- 47.1% of the population in Brent were meeting the recommended 5-a-day fruit and vegetable intake in 2014. This was below the London (50.3%) and England (53.5%) average.
- 31.4% of Brent’s population who are aged 16 and over abstain from alcohol use, almost twice the national average of 16.5%.
- In 2012-14, the TB incidence rate in Brent was 82.9 per 100,000 of the population. This was significantly above the England average rate (13.5 per 100,000) and London average (35.4 per 100,000).
- Brent has 30,616 households with people living on their own (according to 2011 Census). Of these, 29% (8,808) are age 65 and over. Social isolation, loneliness and higher levels of deprivation are all linked with pensioners who live alone. As identified in the JNSA, the number of older people in Brent aged 65 and above is anticipated to increase to 52,900 in 2030, which is equivalent to an increase of 47%. Given this projected rise, the number of people in Brent aged 65 and over who are likely to be affected by social isolation and loneliness is forecast to increase significantly
- The General Fertility Rate (GFR) is the number of live births per 1,000 population for women aged between 15 to 44. The GFR in Brent in 2017 was 74.5, higher than the Outer London (69.8) and national (61.0) average. This reduced to 68.1 in 2018, compared to London (60.0) and England (59.2). This means that the GFR has declined in recent years, both in Brent and nationally.¹⁸

3.5. In November 2017, the number of FTE GPs working within Brent (excluding locums) was 160.42.

¹⁸ Brent Open Data – Population Change in Brent (2019)

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

4. Crime

Evidence Base

- Safer Brent Community Safety Strategy 2018-2021, London Borough of Brent
- Safer Brent Partnership Annual Report 2018-2019
- Residents Attitudes Survey 2018

Evidence Gaps:

- None identified

4.1. The Community Safety Strategy outlines how the Council will seek to mitigate crime, abuse and disorder that occurs within Brent. It identifies the following strategic intentions:

- Reducing Domestic and Sexual Abuse
- Reducing the impact of gangs and/or knives in our community
- Reducing vulnerability and increasing safeguarding
- Reducing offenders and perpetrators from reoffending
- Reducing anti-social behaviour (ASB)

4.2. In 2018/19 the number of crimes within Brent increased by 3.1% over the past 12 months. However, despite this increase Brent's crime rate per 1,000 of the population is below the London average.

4.3. There has been a rise in some Anti-Social Behaviour (ASB) and gang-related offences. Gang and knife crime remains a key obstacle for the borough, and is a key focus of the 2018-2021 Strategy.

Reducing Domestic and Sexual Abuse

4.4. Brent had the 5th highest number of reported domestic abuse (DA) crimes in comparison to the most similar London Boroughs in the year 16-17. In the year up to September 2017 there were over 144,000 incidents, of which 76,000 were notifiable offenses (33% of all notifiable offenses). Of these offenses, 76% related to the victimisation of women and 24% to the

victimisation of men. Brent had the third highest number of violent domestic abuse crimes, which had increased by 7.5% within a twelve-month period.

4.5. There has also been an increase of 1,600 in recorded Sexual Offenses in the 12-month period up to September 2017. Rape offenses have also increased by 19% over the same time period. During the same time period, 86% of sexual violence victims are women, and 14% are men.

4.6. Domestic Abuse hotspot areas within Brent (2017-2018) are shown in Figure 12. The hotspots identified included Harlesden Town centre, Wembley Central, Church End Estate and Stonebridge Estate. These locations have also been identified for ASB and Gang Activity.

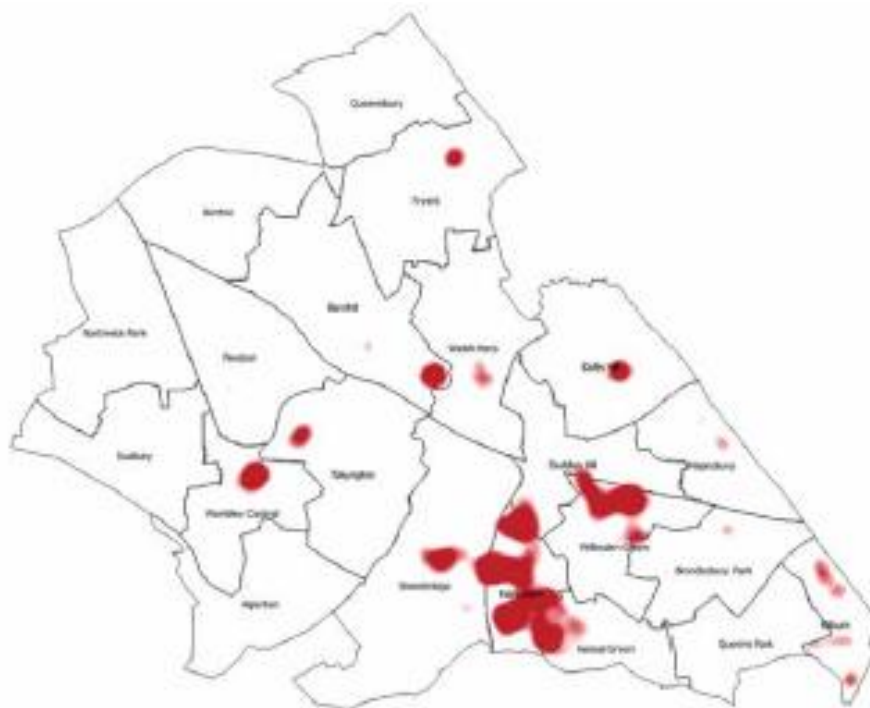


Figure 12: Domestic Abuse hotspots

Reducing the impact of gangs and/or knives in our community

4.7. Brent has recorded an increase in the gang relating offending, including: firearm discharges; stabbings; and young people being exploited by gang nominals and organised crime groups. Based on local knowledge and the Metropolitan Police gang matrix, there are currently 22 gangs within the borough. There are estimated to be over 1,000 known individuals involved with gang criminality within Brent, of which 288 have been identified by the current Metropolitan Police Gangs Matrix. The strategy states that Brent gang's cohort is over 90% male, 80% black and has an average age of 24 years old. The highest gang risk areas within the borough is Church Road/Church End Estate, Stonebridge Estate and South Kilburn Estate

4.8. As at 18/19, emerging gangs in Kingsbury, Wembley, Neasden and Willesden are now the main problem profile in Brent. These cohorts are often not on the gangs matrix with evidence to show that more established gangs on the matrix are across county lines.¹⁹

4.9. The year ending 16/17 saw a rise in knife injury within Brent, with 87 victims, an increase of 3 compared to the previous 12 months (15/16), as shown in Figure 13 below. However, according to the Safer Brent Partnership Annual Report 2018/19, the

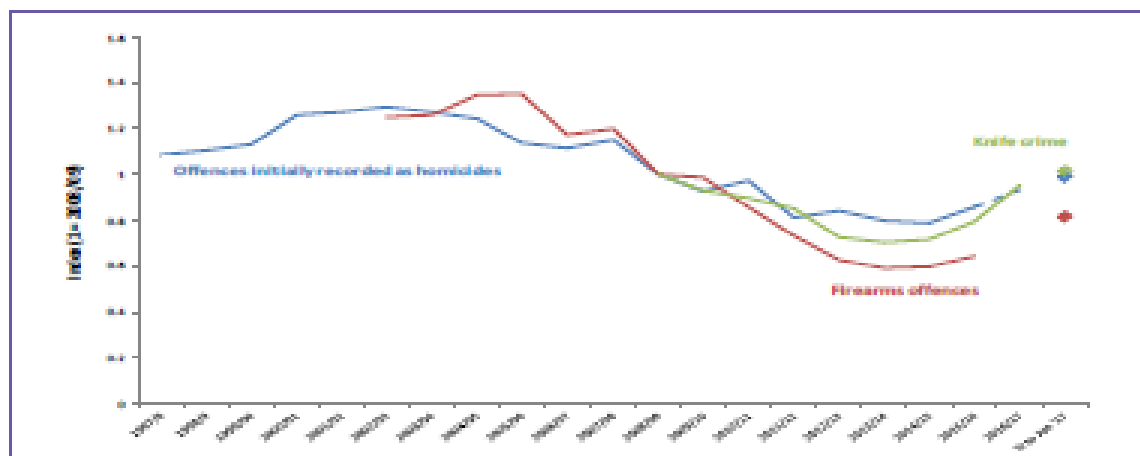


Figure 13: Knife and Gun crime within the borough (to Jun 17)

¹⁹ Safer Brent Partnership Annual Report 2018-2019

- 4.10. 18/19 year has seen a reduction of 13% in knife crime offences, and there was only one knife related murder which was not gang-related.
- 4.11. Stabbings incidents have occurred across the borough, however there are four main hotspots: Harlesden Town Centre, Neasden Town Centre along Neasden Lane, Old Church Road and Kilburn High Road . Furthermore, in 2018/19 Brent has the third highest number of lethal-barrelled gun discharge incidents (31) when compared to the most similar boroughs. This in an increase of 12.5% from the previous year.²⁰

Reducing Vulnerability and Increasing Safeguarding

- 4.12. In Brent Council has developed the Brent Community MARAC (MARAC), which is a multi-agency panel meeting which shares information on high-risk cases to vulnerable individuals and put in place a risk management plan to address the safety and protection of those victims.
- 4.13. There has been a 52.58% reduction in risk in the Community MARAC cases in the 18/19 year There was a range of vulnerabilities identified within the cohort, which included mental health, substance misuse, repeat victim/perpetrator, physical disability, forensic history, vulnerable minority e.g. religious, political, cultural, learning disability and homelessness.
- 4.14. Nearly 80% of all hates crimes within the borough as based on race, religion/faith or ethnicity. In Brent, over a 12-month period (up to August 2017) there was a total of 779 hate incidents recorded, which involved 816 victims. Brent has the second highest number of reported Islamophobia incidents in comparison to similar London Boroughs over a 12-month period, which is an increase of 18.8% from the previous 12months.
- 4.15. Analysis has also highlighted that Child Sexual Exploitation (CSE) as a high-risk, high harm issue. As identified in the community safety strategy, in the year to 2017 there were 25 non-crime CSE reports and 24 crime reports which have a CSE flag. The peak age of CSE victims in Brent is 15 years old.

²⁰ Safer Brent Partnership Annual Report 2018-2019

Reducing Anti-Social Behaviour (ASB)

4.16. In the year ending 18/19 Brent had received the third highest number of ASB calls in comparison to most similar London boroughs, and in increase of 0.1% from the previous 12 months. Brent was one of the only two boroughs that saw an increase in ASB calls out of the most similar group. Brent's ASB recorded data for December 2016 to December 2017 has shown the top three repeated categories to be open rug markets, rough sleeping and street drinking. ASB hotspots within the borough have been identified in Figure 14.

4.17. The Resident's Attitude Survey, carried out by Brent Council in 2018, found that 47% of the surveyed population felt fairly safe walking outside in their area alone after dark, with 15% feeling a bit unsafe and 10% feeling very unsafe. Since 2002, there has been a significant reduction in percentage of people who feel very unsafe walking outside alone after dark, decreasing from 24% in 2002 to 9% in 2014 and back up slightly to 10% in 2018.

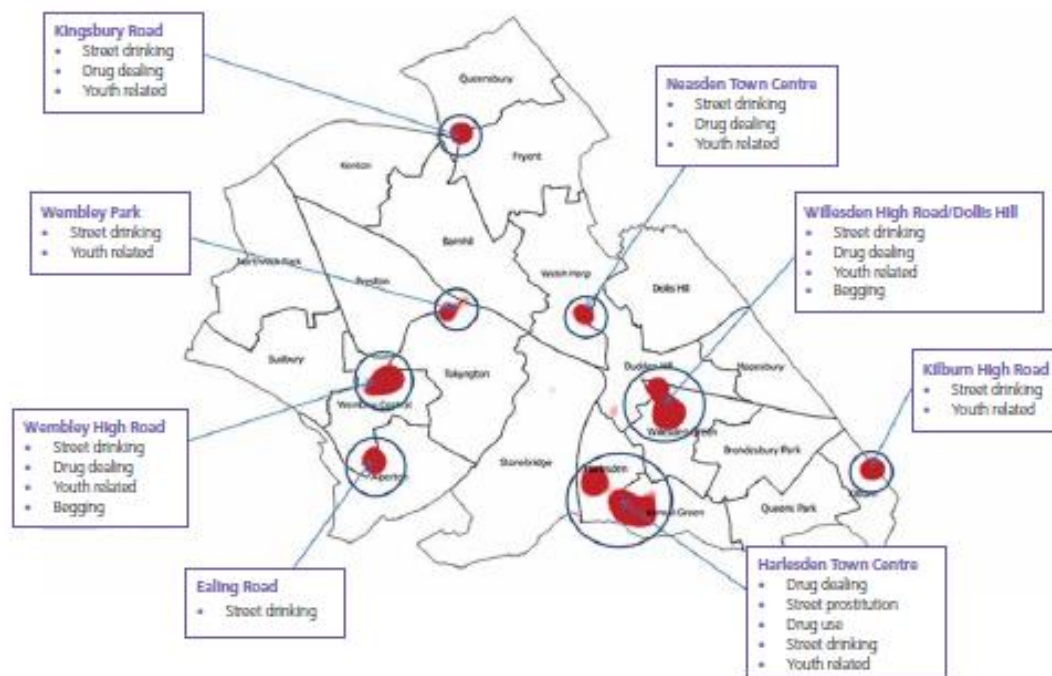


Figure 14: ASB hotspots

5. Water

Evidence

- West London Strategic Flood Risk Assessment – Level 1
- Strategic Flood Risk Assessment - Level 2
- Surface Water Management Plan, 2011
- Brent Flood Risk Management Strategy
- Brent River Corridor Improvement Plan, Brent Catchment Partnership, 2014
- Thames River Basin Management Plan, Environment Agency

Evidence Gaps

- Water consumption per household

5.1. Brent's Blue Ribbon Network (Figure 15) includes the following water bodies:

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

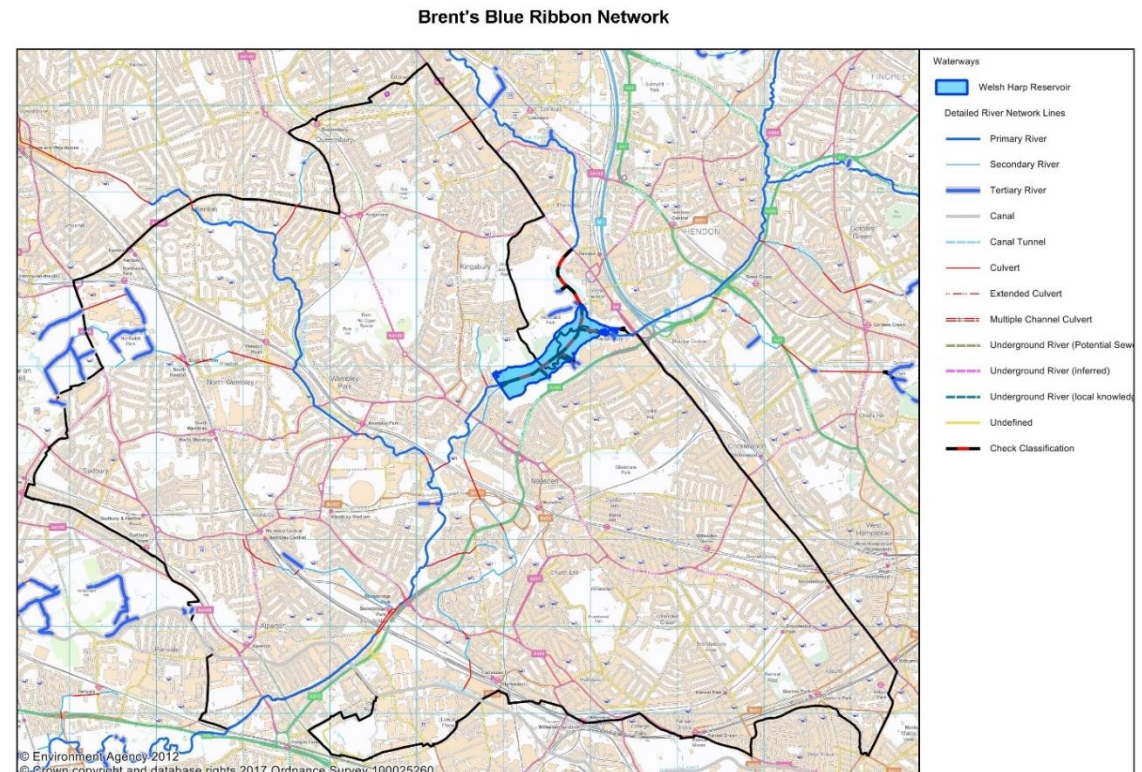


Figure 15: Brent's Blue Ribbon Network

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

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

5.3. The Water Framework Directive is a European Union Directive which commits all member states to achieving a 'good status' for all water bodies. As identified in Table 14, the rivers, lakes and canals within the Brent catchment are achieving a 'moderate' status. This status is primarily due to pollution and physical modification from urban development, transport and the water industry.

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

Table 14: Status of Brent's waterbodies

5.4. The Brent Catchment Partnership, an informal group of organisations who are committed to improving the rivers in the Brent catchment, have prepared the 'Brent Catchment River Improvement Plan' which seeks to "*improve and enhance the rivers*

within the Brent Catchment, making them cleaner, more accessible and more attractive, to benefit local communities and wildlife”. To achieve this, the document identified a number of objectives, which included:

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

5.5. The West London Boroughs of Brent, Barnet, Ealing, Harrow, Hillingdon and Hounslow jointly commissioned a Level 1 Strategic Flood Risk Assessment, which was completed in 2018. The SFRA identified areas within all boroughs that were at risk from all sources of flooding and provided recommendations which would reduce the risk of flooding to residents and buildings.

5.6. The SFRA identified that the following areas within Brent are at risk of fluvial flooding (Figure 16). The areas at risk are predominantly within proximity to the borough’s watercourses, in particular the River Brent, Welsh Harp and Wealdstone Brook. There are also areas within the Stonebridge Ward which are at risk of fluvial flooding.

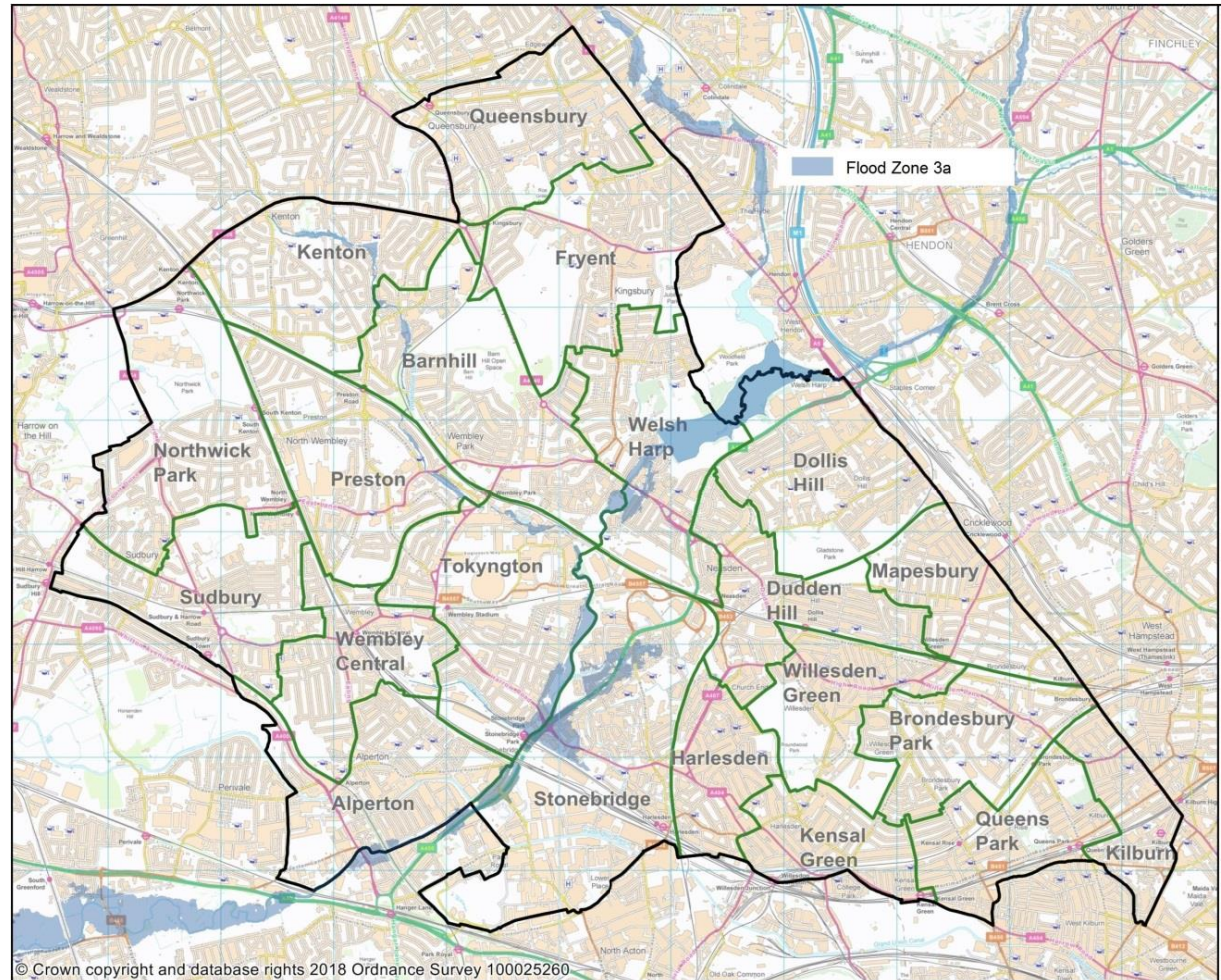


Figure 16: Areas at risk of fluvial flooding

5.7. Furthermore, the SFRA identified areas within the borough which are in the functional floodplain. Flood Zone 3b is defined as 'land within EA modelled fluvial and tidal flood risk extents predicted for up to and including 1 in 20 year return period events allowing for the impact of flood defences' and 'land which is included within the EA's storage areas dataset'. Areas of functional floodplain within Brent are concentrated around the River Brent.

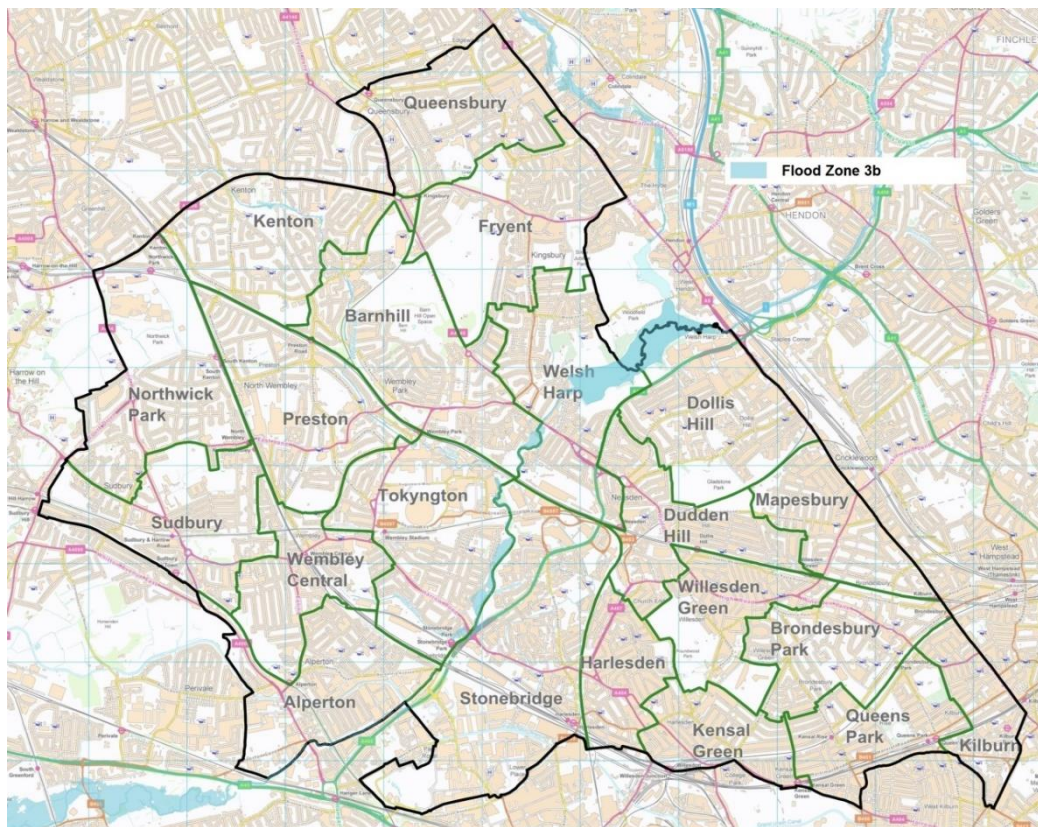


Figure 17: Areas of Brent within functional floodplain (Flood Zone 3b)

5.8. The Joint West London SFRA defined Flood Zone 3a – Surface Water as ‘Land within EA modelled surface water flood risk extents predicted for up to an including 1 in 100 year return period events’. As shown in Figure 18, there are a number of areas across the borough which are at risk to surface water flooding. Areas which appear to be particularly susceptible to surface water flooding is the borough’s road network. According to the Environment Agency’s property count for their national Flood Map for Surface Water (FMfSW) dataset, approximately 35,500 residential properties and 4,400 non-residential properties in Brent could be at risk of surface water flooding of greater than 0.1m (10cm) depth during a rainfall event within a 1 in 200 probability of occurrence in any given year.

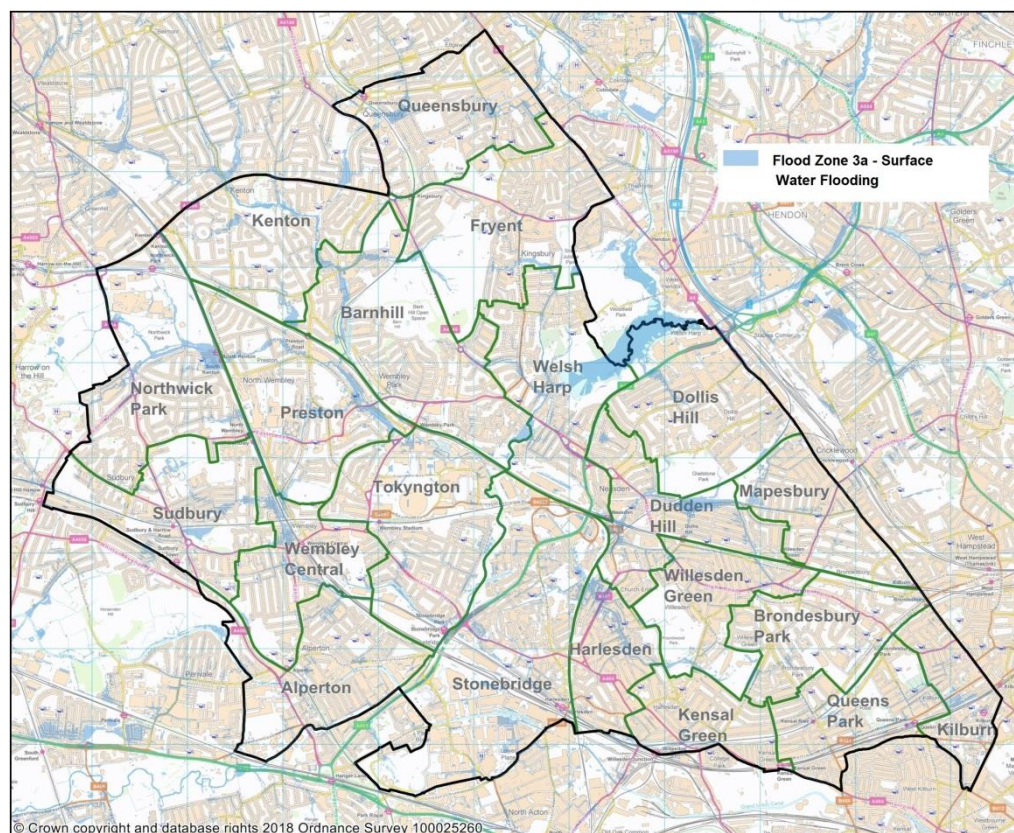


Figure 18: Areas of risk of surface water flooding

5.9. Furthermore, as identified in the Government’s preliminary flood risk assessment for Brent (reviewed in 2017), there has been few flooding incidents within the borough. Most of the flooding within the borough is due to inadequate capacity in the Brent North Catchment and a drainage study is in progress to identify the problems and locations.

5.10. There are no groundwater Source Protection Zones within Brent.

5.11. The borough’s Surface Water Management Plan (SWMP) identified 27 Critical Drainage Areas (CDAs) (Figure 19), a number of which are cross-boundary. A CDA is “a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure”.

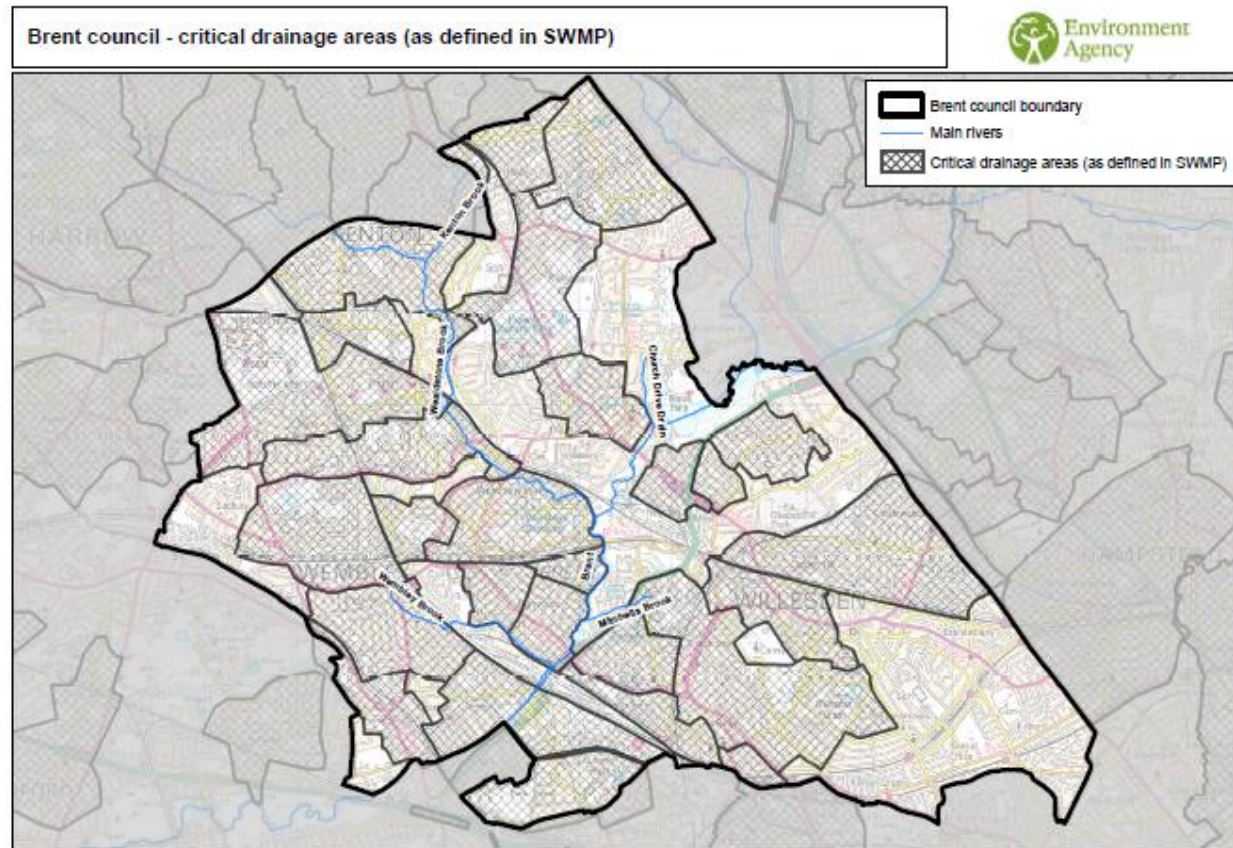


Figure 19: Critical Drainage Areas (CDAs) within Brent

- 5.12. The Council's SWMP also identified that within Kenton, Northwick Park and Preston Road surface water flooding is likely to be caused by pluvial, sewer and groundwater flooding
- 5.13. The Thames Water Storage Utilisation model has mapped sewerage capacity across London. As shown in Figure 20, within Brent there are areas of limited capacity, particularly within the northern and western region. It is predicted that sewerage capacity within the western region of the borough will be at capacity by 2050.

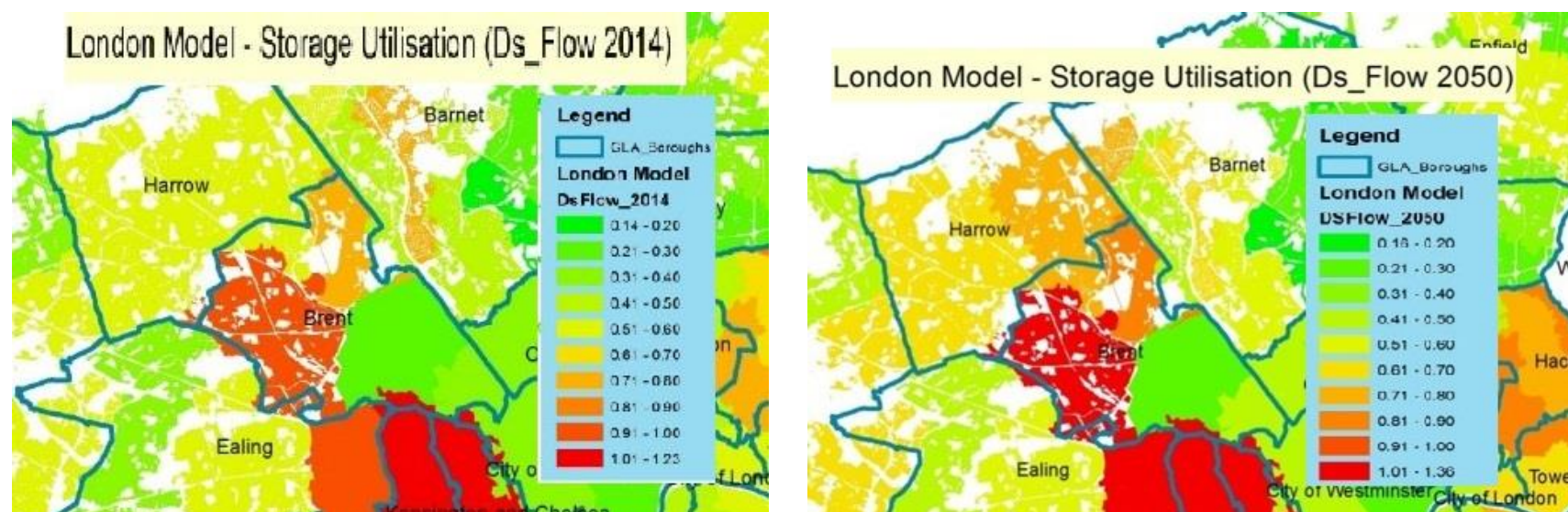


Figure 20: Storage capacity within Brent, 2014 and 2050

6. Air Quality

Evidence

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

Evidence Gaps

- None identified

6.1. Brent meets all the national air quality targets except for two pollutants – Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). In the areas where these targets have not been achieved, the Council has declared an Air Quality Management Area (AQMA). The borough's AQMA is depicted in Figure 22. Air quality outside of the AQMA has not worsened since 2006.

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

6.3. In the Air Quality Action Plan 2017-2022, the Council created four Air Quality Action Areas (AQAA) at Neasden Town Centre, Church End, the Kilburn Regeneration Area and Wembley and Tokyngton. A specific action plan will be created for each area which includes actions on how to address the main sources of pollution. In addition, for these areas the Council will develop strategic policies and localised focussed air quality measures.



Figure 21: Air Quality Management Area (AQMA) within Brent

7. Soils and Geology

Evidence:

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

Evidence Gaps:

- None identified

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

7.2. Barn Hill Open Space has been put forward for designation as a locally important geological site within the emerging London Plan due to the presence of Dollis Hill Gravel.

7.3. As of November 2014, 1778 sites were identified as having potentially contaminative historic uses. These sites (Historical Industrial Sites within Brent) are identified in Figure 23. However, as of 2018, sufficient information had been identified for 360 sites as to whether they were 'contaminated' as per the statutory definition. The majority

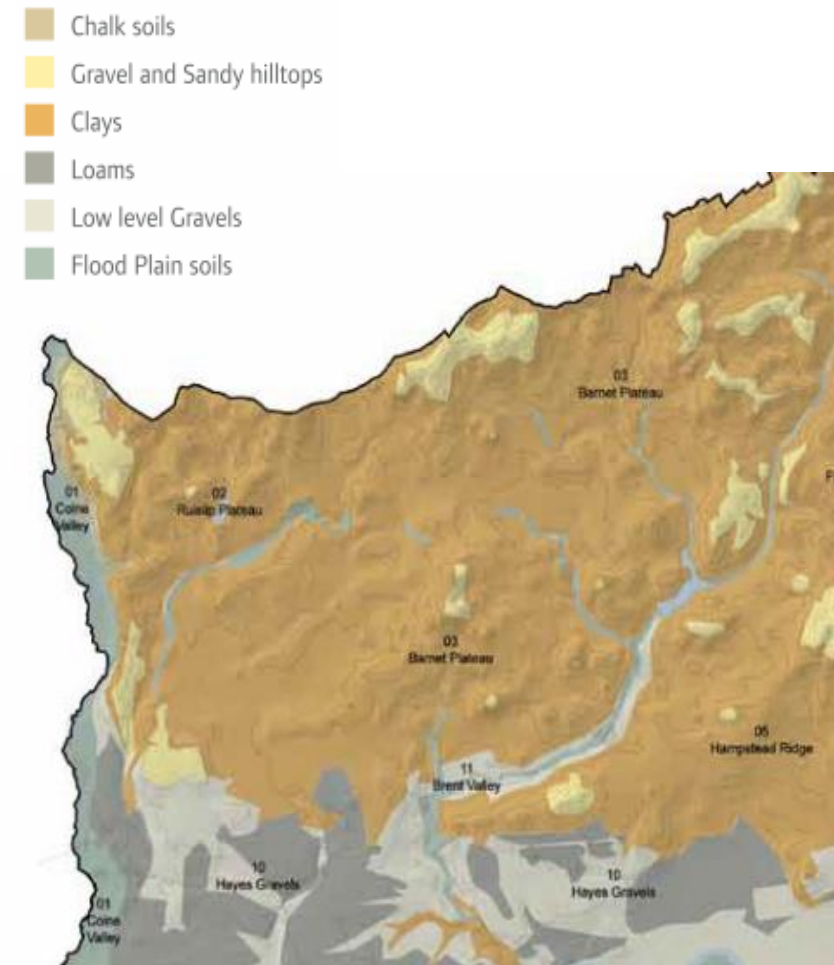
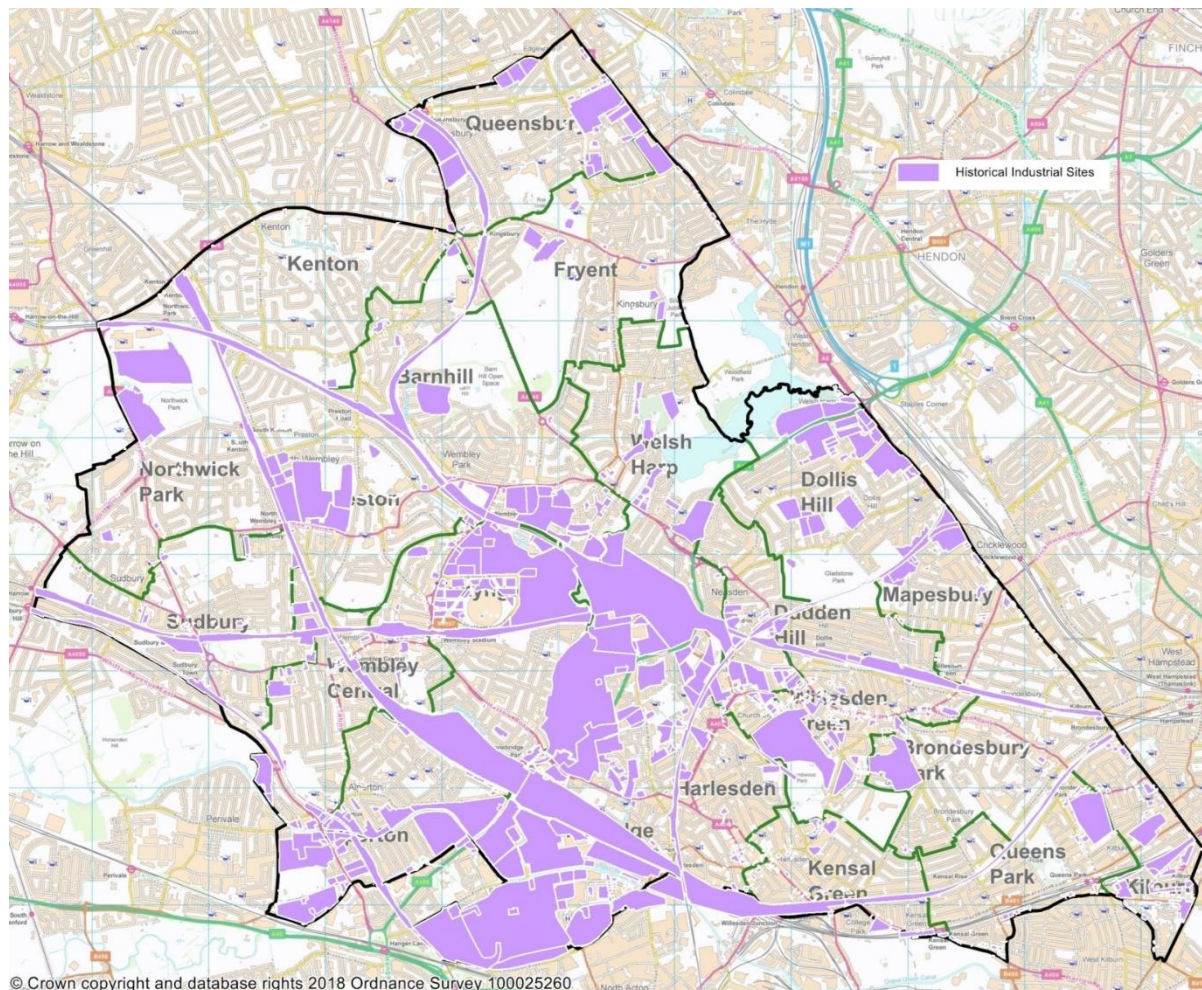


Figure 22: Geology of Brent

of these have been redeveloped via the planning regime, where the investigation and remediation of soil was secured through planning conditions.²¹



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Figure 23: Historical Landfill Sites within Brent

²¹ Contaminated Land Inspection Strategy, Brent Council

8. Climate Change

Evidence:

- Brent Climate Change Strategy and supporting evidence document
- Joint West London Strategic Flood Risk Assessment
- Climate Just (www.climatejust.org.uk)

Evidence Gaps:

- None Identified

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

Heat

8.2. It is anticipated that as a result of climate change, temperatures will be higher all-year round, by an average of +3.6° in the summer and +2° in the winter by 2050.

8.3. London is affected by overheating, which is further exacerbated by the Urban Heat Island (UHI) effect. UHI is caused by the reduction in green space through urbanization, generation of heat in an area and the large amount of urban hard surfaces which prevent cooling. Within London, the UHI can add up to a further 5°- 6° on a summer night which can result in London areas being up to 10°C hotter than rural areas. It is also expected that the summer heat wave of 2003, which caused 600 deaths in London, will be the average by the 2040s.

8.4. Due to Brent being a largely urban area with comparatively little parkland, higher temperatures will have a bigger impact due to the amount of concrete buildings. A hotter Brent will create a number of social impacts, such as more people suffering from illness. However, as shown in Figure 24, residents that live within a particular area of the borough are more vulnerable to the impacts of increased heat than others.

8.5. Figure 24 shows areas of social heat vulnerability within the borough. Social heat vulnerability is mapped through showing how persona, social and environmental factors can create uneven impacts on people and communities in respect to a heat-related hazard. The following five dimensions are used to assessed social vulnerability:

- Sensitivity – biophysical characteristics which affect the likelihood that a heat wave or flood event will have a negative health and welfare impact. Characteristics assessed for this dimension include age and health.
- Enhanced exposure – aspects of the physical environmental that could accentuate or offset the severity of heat wave and flood events. Characteristics assessed for this dimension include the availability of green space, topography, availability of blue space and housing characteristics
- Ability to prepare – this is governed by social factors. Characteristics assessed for this dimension include income, tenure, and information use
- Ability to respond – this is governed by social factors. Characteristics assessed for this dimension include income, information use, social networks, mobility, crime, general infrastructure and general accessibility
- Ability to recover – this is governed by social factors. Characteristics assessed for this dimension include social networks, mobility and availability of services.

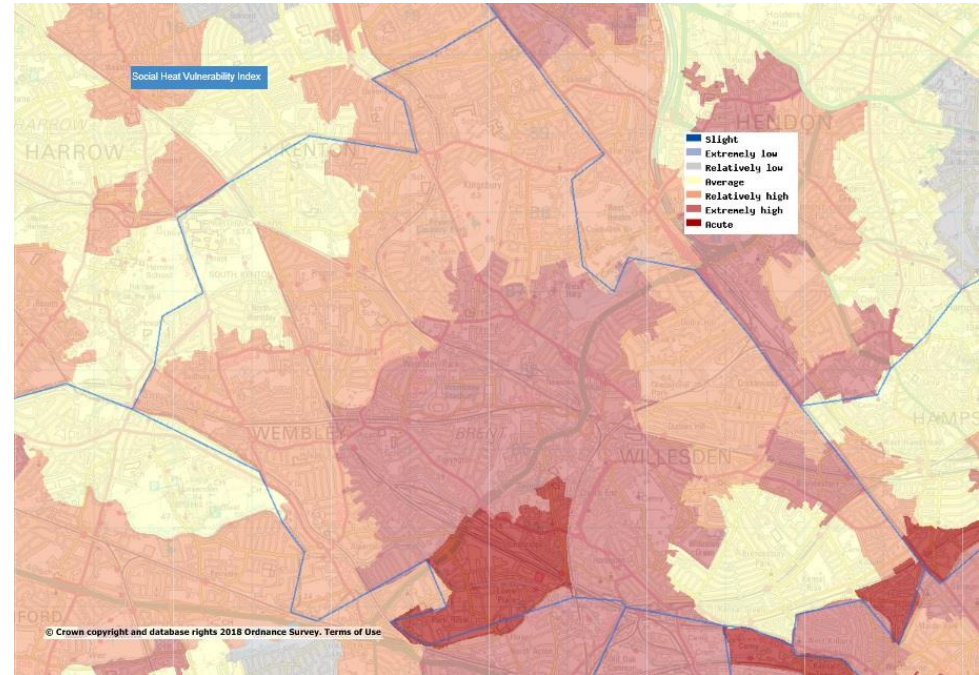
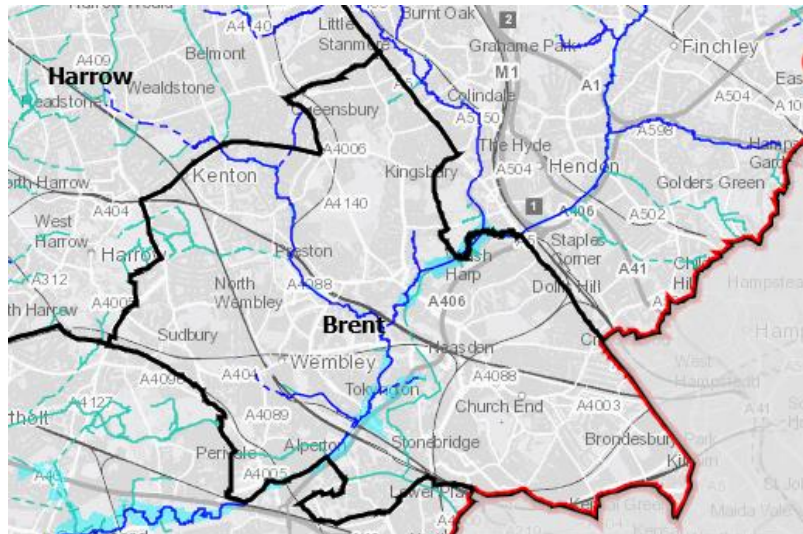


Figure 24: Social Heat Vulnerability

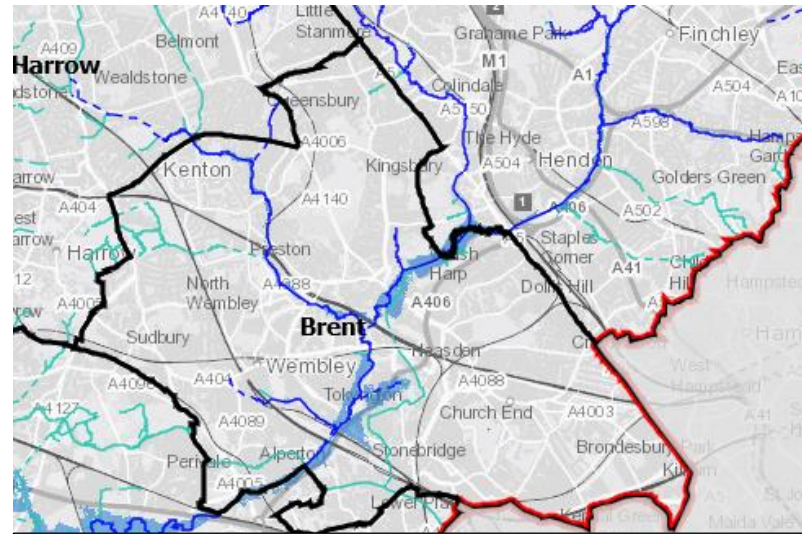
8.6. As shown above, there are areas within the Stonebridge Ward and Kilburn Ward, which have acute social heat vulnerability, and the central region where there is extremely high social heat vulnerability. The area within Stonebridge which has acute social heat vulnerability largely falls within the administrative area of OPDC.

Rainfall and Flooding

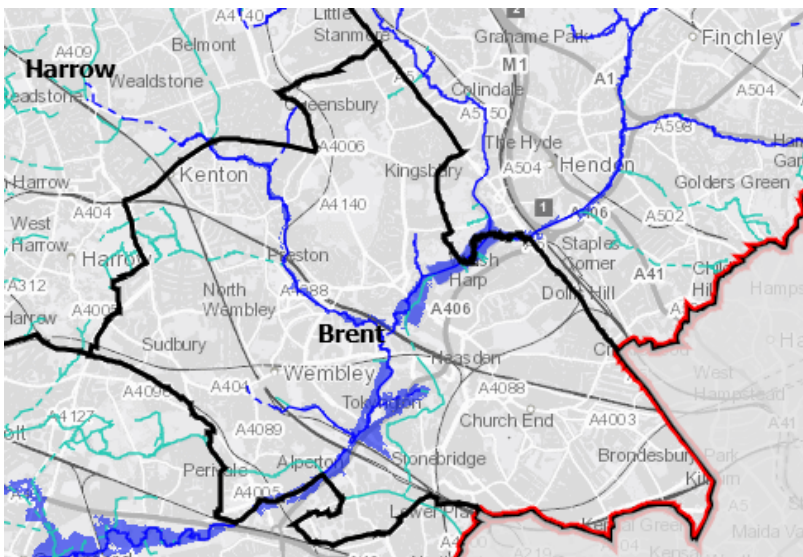
- 8.7. Heavy thunderstorms and intense winter downpours will become more common as a result of climate change. Due to Brent's urban, built-up nature, almost all rainfall ends up in drains which have not been designed to cope with sudden, very heavy rainfall. This will result in flash flooding, which could block roads, cause damage and lead to prolonged disruption to the local economy.
- 8.8. The Joint West London SFRA assessed the impact that climate change would have on flood risk within the west London boroughs. The impact that climate change can have on fluvial flood risk within the borough is shown in Figure 25. The below maps indicates that increases within the peak river flow, the greater the area impacted by fluvial flooding within the borough.
- 8.9. Climate change can also increase the risk of surface water flooding within the borough. The SFRA identifies that the 3.3% annual probability extent is considered to represent the current likely risk and the 1% annual probability extent represents the potential climate change adjusted impact of current risk. In general, the greater the probability, the greater the area impacted by surface water flooding. Furthermore, the impacts of areas already affected by climate change could become more severe as a result of the increase in water depth. This is demonstrated in Figure 26, which focuses upon the area around Wembley Stadium.



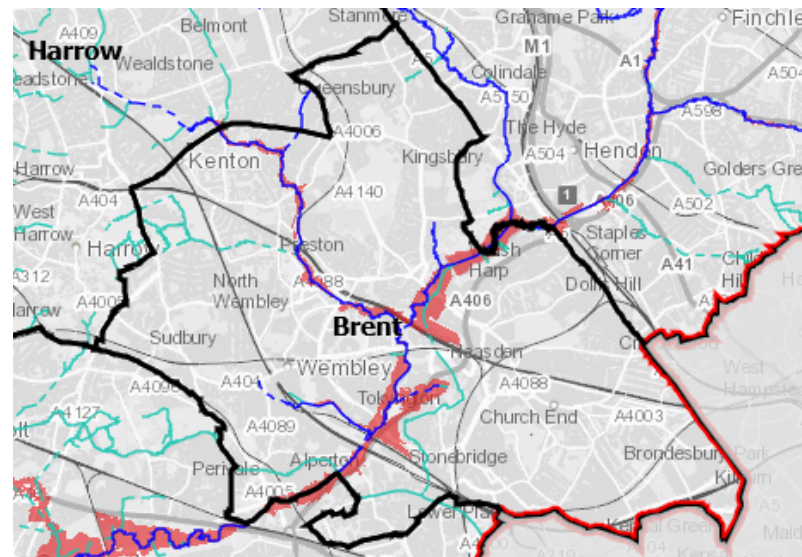
1 in 100 year probability event



1 in 100 + 25% increase in peak river flow due to climate change

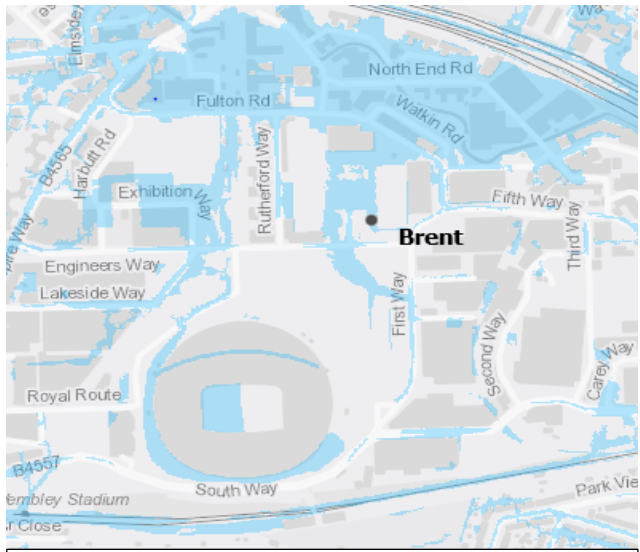


1 in 100 + 35% increase in peak river flow due to climate change



375 1 in 100 + 70% increase in peak river flow due to climate change

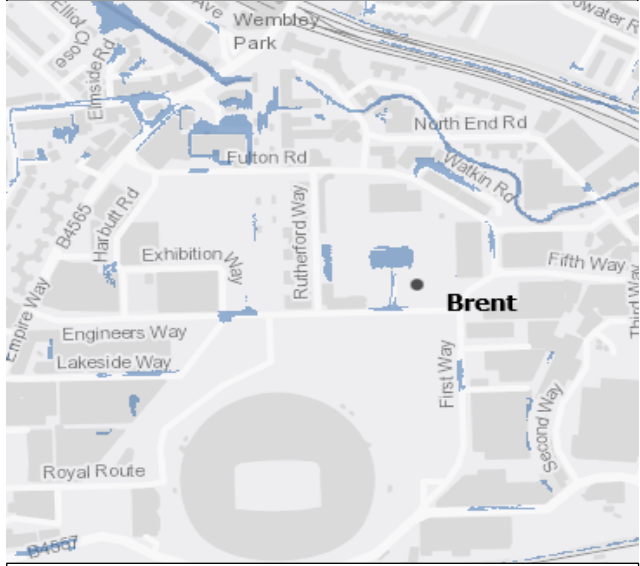
Figure 25: Impacts of climate change of fluvial flood risk within Brent



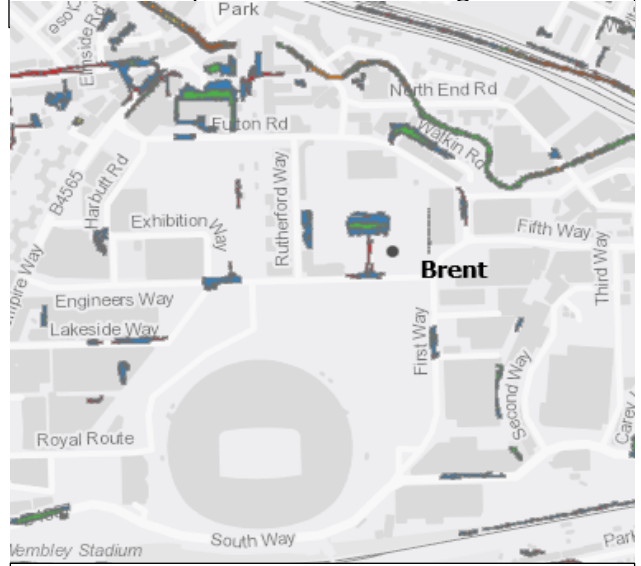
EA 2017 – Risk of Flooding from Surface Water.
Extent: 0.1% annual change



EA 2017 – Risk of Flooding from Surface Water.
Depth: 0.1% annual change



EA 2017 – Risk of Flooding from Surface Water.
Extent: 3.3% annual change



EA 2017 – Risk of Flooding from Surface Water.
Depth: 3.3% annual change

376

Figure 26: Impact of climate change on surface water flooding - area around Wembley Stadium

- 8.10. Figure 27 maps the flood vulnerability index for the borough. Flood socio-spatial vulnerability refers to mapped social vulnerability with respect to flooding. Personal, social and environmental factors are all taken into consideration and are used to help to explain the uneven impacts on people and communities in particular neighborhoods/areas. Like social heat vulnerability, the flood vulnerability index uses the same five dimensions to assess social vulnerability to flooding events. Areas where people are particularly vulnerable to flood risk are Stonebridge, large areas of Tokyngton, Gladstone and parts of Dudden Hill and Welsh Harp.

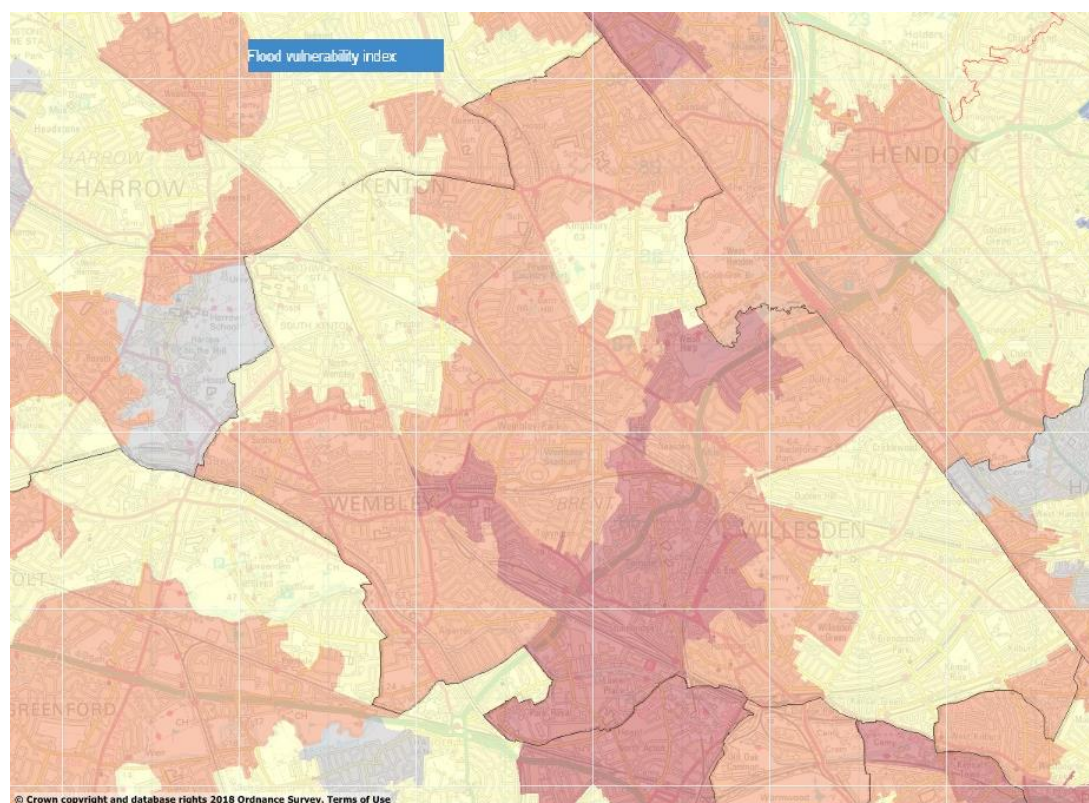


Figure 27: Flood vulnerability index

Storms

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

Risks of Climate Change to Brent

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

9. Biodiversity, Flora and Fauna

Evidence

- Brent Review of Sites of Importance for Nature Conservation

Evidence Gaps

None identified

9.2. The borough has 62 Sites of Importance for Nature Conservation. The location of these sites are identified in Figure 28.

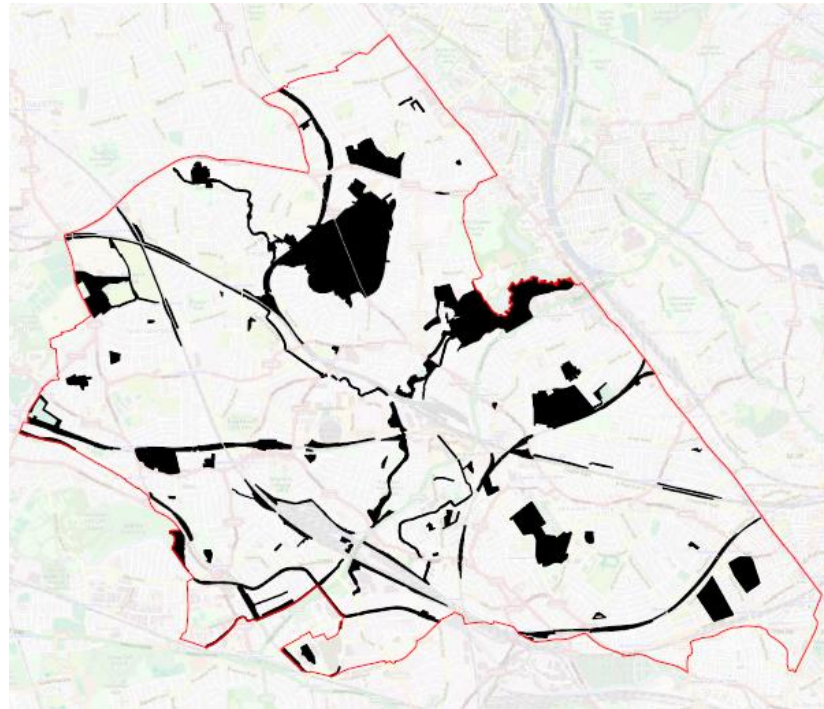


Figure 28: Location of SINC sites within the borough

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

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

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

- **Trees, Woodlands and Hedgerows:** A wide range of habitats is associated with trees in Brent. These include broadleaved woodland, lowland mixed deciduous woodland, wet woodland, street trees, veteran trees, orchards, hedges and hedgerows, and scrub.
- **Grasslands:** A large proportion of the borough has grassland cover which provides benefits for recreation, urban flood reduction and soil conservation, only a proportion of this is actively managed for wildlife. Of the wildlife grasslands in the borough, the hay meadows at Fryent Country Park are amongst the best in London. In other areas of the borough, for examples around the Brent Reservoir, on Barn Hill and at Gladstone Park, there are remnants of more acid grasslands. Elsewhere there are rough grasslands and wildflower meadows in a few gardens.
- **Private Gardens and Allotments:** The 2007 Biodiversity Action Plan states that private gardens occupy a fifth of the borough by land area and had 1,108 allotment plots (this has since increased to 1138 plots and 103 shed plots as identified in the Food Growing and Allotment Strategy). Approximately 20% of biodiversity by land area in Brent is represented via its gardens and allotments.
- **Wetland Habitats:** Wetland habitats include habitats that provide for freshwater wildlife: rivers and streams, ditches, the Brent Reservoir, Canal Feeder, Grand Union Canal, freshwater marsh and reed-be habitats; and ponds. Each of these could be considered individually and as contributing to a richer wildlife in Brent. Most habitats could also be considered in terms of length or area, water quality, wildlife, access and specific projects.

- **Railside Habitats:** These areas are generally inaccessible to people, however they can provide areas of scrub, rough grassland and other habitats
- **Schools grounds:** A small proportion of school grounds include SINCs. The Welsh Harp Environmental Education Centre (which was previously managed by the borough until 2016) is a dedicated facility for environmental education, but is also a base for waterway improvement projects taking place across north-west London.
- **Parks and Green Spaces:** Parks and green spaces provide much of the area of publicly accessible land in the borough and encompass much of the semi-natural habitats including grasslands, trees, woodland, hedgerows and ponds.
- **Churchyards and Cemeteries:** As well as provide areas of contemplation and waling, churchyards and cemeteries provide a range of intricate habitats, often with various grasslands and open woodland habitats. All three cemeteries within the borough boundary and both burial grounds are recognised by the GLA as Sites of Importance for Nature Conservation (SINCs).

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

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

9.8. As of January 2020, there were 265 tree preservation orders within the borough. Some of the orders protect a single tree whereas others protected multiple trees. In a couple of instances, the orders protect small woodlands.

10. Heritage Assets (Architectural and Archaeological)

Evidence

- Brent Heritage Asset webpage
- The National Heritage List for England, Historic England
- Heritage at Risk Register, Historic England
- London Parks and Gardens National inventory
- Historic Environment Place-Making Strategy, 2019, Brent Council

Evidence Gaps:

- Brent has not had a comprehensive review of its statutory listed buildings since 1978
- The Local List of Buildings of Architectural or Historic Importance was established in 1975 with the last adopted version recorded in 2004. A public consultation exercise was undertaken in 2015, identifying over 100 potential properties, however, the final list was never adopted.
- The Archaeological Priority Areas for Brent are due for review in 2020. Further information is available at <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/>
- In 2006 character appraisals for all 22 conservation areas were published. These are not fully comprehensive and are out of date. An audit of existing conservation areas took place in 2019 with a number of recommendations, such as alterations of existing Design Guides, boundary reviews, and introduction of Article 4 Directions.

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

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

Statutory Listed Buildings

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

10.4. There are around 250 statutory listed buildings in Brent. These buildings are listed under the following categories:

- Grade I buildings – these are buildings that are of exceptional interest. There is one Grade I listed building within Brent
- Grade II* buildings - these buildings are particularly important buildings of more than special interest. Brent has 9 Grade II* buildings
- Graded II buildings – buildings that are of special interest. Brent has around 240 Grade II buildings within the borough.

10.5. Most listed buildings within Brent are residential properties that are in private ownership.

Heritage at Risk

10.6. The Heritage at Risk Programme (HAR) helps Historic England understand the overall state of England's historic sites. Launched in 2008, the programme identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. Every year, Historic England updates the Heritage at Risk Register. As of January 2020, Brent Council has 9 buildings on the register. The details of these have been extracted from the HAR register and summarised in the below table.

Name	Description	Heritage Category	Condition	Additional Information
Former Savoy Cinema, Burnt Oak Broadway, Edgware	The Savoy Cinema was built for the independent circuit Goide & Glassman and was designed by cinema architect George Coles. It opened on 29th June 1936 with Bobby Breen in "Rainbow on the River". It is an impressive cinema with all of its internal Moderne fittings intact. It operated as a bingo hall from the 1960s but closed in 2014.	II	Poor	Despite several attempts to sell, occupy and find a new use for the building it remains empty and in a declining state with crumbling plasterwork.
Summerhouse, Kingsbury Manor, 288, Kingsbury Road	Summerhouse, circa 1899, by William West Neve, who designed the adjoining Kingsbury Manor for Mary Blair, Duchess of Sutherland. Built in the Arts and Crafts style, timber-framed with patterned brick nogging on a brick plinth edged with stone, and a hipped thatched roof.	II	Poor	The Local Authority and the owner have begun discussions to develop a strategy for the summerhouse's repair and re-use.
Church of St Andrew, High Road, Willesden Green	Designed by James Brooks and built in 1885 in red brick with stone dressings and steeply pitched slated roofs. There is a small bell turret with a slate clad fleche over the crossing. Brooks also designed the adjacent grade II vicarage.	II*	Poor	The church suffers from cracking, some severe, mainly at the eastern end. Potentially loose stones internally have been pinned to secure them and the church is undergoing monitoring and various investigations in order to ascertain the cause of movement which is resulting in the cracking.

Name	Description	Heritage Category	Condition	Additional Information
Old Oxgate Farm, Coles Green	C16 and C17, timber-framed and plastered with a little brick rebuilding. Two parallel ranges, that to north probably C16, that to south C17, ending in a double gable end on road. Three storeys with one window (modern casement with lead light) per floor under gable. Left hand of around floor rebuilt in brick. Central door with wooden porch. Main front facing south on garden at right angles to road. Two storeys. 2 windows and door. Tile roof. Windows 3-light slashes with trellis porch. Interior – ground floor room with moulded and chamfered beams and floor of large flagstones.	Grade II*	Poor	C16 and C17 timber-framed building suffering from subsidence to the brick plinth and structural failure of beam ends to the ground floor due to damp penetration. The owner carried out urgent works in 2013 and is exploring possible long term solutions. A condition assessment was produced in 2016, funded by Historic England, and priority works identified in that survey to safeguard the building were completed in 2017. Funding for repair to the front façade is due to be secured through a Section 106 agreement but this has not yet been implemented.
Cambridge Hall, Cambridge Avenue	Former church, now hall. 1863. Prefabricated structure built of corrugated iron with boarded wooden roof covered in corrugated asbestos. Fairly elaborate example with 4 bay nave, aisles and tower, which originally had a chamfered spire which has been broken off near the base. Central tower of two stages has pointed arched window with two lancets, quatrefoil above and louvres. Large arched doorcase with steeply pitched gable above. Lancet on either side of tower and large arched window to aisles. Square windows to sides of aisles. Interior has unusual arcading with cast iron columns with	II	Poor	Since 1930 it has been the homes of the Willesden and St Marylebone Cadet Corps which converted the interior to resemble a boat, in itself of historic interest. It is putting together a business plan to acquire funds to run the building as a community venue. Planning Permission and Listed Building Consent were granted in 2016 for an adjacent residential building, as well as some repair works to Cambridge Hall.

Name	Description	Heritage Category	Condition	Additional Information
	moulded capitals and tall slender wooden arches. One aisle has been partitioned off. Unusual roof has 6 tiers of purlins and the principal rafters have giant wooden arches with pierced quatrefoils, daggers and mouchettes.			Discussions are underway about restoration and funding sources.
The Chapels at Paddington Cemetery, Willesden Lane	1855, by Thomas Little as part of a new cemetery. Typical group of Anglican and nonconformist chapels connected by a pair of carriage-porches and a central bellcote behind which is a lodge. C13 style, the Anglican chapel having richer, more developed windows. Squared rag-stone with ashlar dressings slated roofs. Iron finials.	II	Poor	The vacant buildings are isolated within the cemetery and too dangerous to use. Funding for repairs and a long term solution is being sought.
Wembley Hill Lodge, Wembley Hill Road	Early 19th century cottage orné style. One storey and attic colour washed brick with gable to front. One 2 light leaded casement in gable; one 3 light leaded casement oriel window on ground floor with thatched roof. Part set back to right of one storey with continuous lean to roof in front, serving as a canopy to porch. Thatched roof. Left hand part has colour washed brick lower part; 20th century tile hanging to upper floor and tile roof. Formerly a lodge to Wembley Park.	II	Very Bad	The detached property was severely damaged by a fire in 2013 and the owner is intending to sell the building.
St Michael's Church, St Michael's Road, Wembley	Designed by John Samuel Alder and built in 1910 in stone with pitched roofs, covered in tiles, and flat roofs to the aisles which are felted. In the north west corner is the base of a tower which was never built. The church generally is in poor condition with movement resulting in	II	Very Bad	Immediate risk of further rapid deterioration or loss of fabric; no solution agreed

Name	Description	Heritage Category	Condition	Additional Information
	cracking, and faulty rainwater goods allowing water ingress with much staining internally. The west end window is supported by a framework of scaffolding poles.			
842 Harrow Road, Queens Park	Early C19 detached villa with later alterations and extensions. The building has been unoccupied for a number of years and is in very poor condition, with some unauthorised and harmful works having been carried out by the previous owner. Urgent and temporary propping works have been implemented and applications for Planning Permission and Listed Building Consent are being considered by the Local Authority (May 2019).	II	Very Bad	Immediate risk of further rapid deterioration or loss of fabric; no solution agreed

Table 15: Listed Buildings/ Structures within Brent on the Heritage At Risk Register

Local List

- 10.7. The Local List of Buildings of Architectural or Historic Importance is an essential tool in the protection and enhancement of local heritage (non-designated heritage assets). Whilst not Statutory Listed, these buildings and structures are of good quality design or area historically significant. There are important local landmark features in their own right and make a significant contribution to the character and appearance of their locality. These assets are known as 'locally listed' and includes monuments, sites, places, areas of landscapes identified as having a degree of significant meriting consideration in planning decisions
- 10.8. There are over 200 non-designated heritage assets on the Council's Local List on Brent's Local List. The Local List of Buildings of Architectural or Historic Importance was established in 1975 with the last adopted version recorded in 2004. There are currently no Article 4 Directions placed on any buildings within the list (outside of conservation areas) and these remain unprotected from demolition and damaging alterations.

Conservation Areas

10.9. Conservation areas are designated to safeguard areas of special architectural and historic interest, the character and appearance of which is desirable to preserve or enhance. There are currently 22 conservation areas in Brent within which there are special planning controls which need to be considered when undertaking development. The 22 conservation areas within the borough cover approximately 323 hectares, which equates to 7.47% of the borough's area.

10.10. The 22 conservation areas within the borough are identified in Figure 29, with their location being depicted in Figure 30.

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

Figure 29: Conservation Areas within Brent

Conservation Character Appraisals

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

- 10.12. In 2006 the Planning Service produced Character Appraisals for the Borough's 22 conservation areas in response to the Council's Comprehensive Performance Assessment. Although these were based on guidance from Historic England, the appraisals were generic, describing history but do not properly describe the significance of the area nor outline proposals for management. There is new guidance (2016) from Historic England on which provides advice on the appraisal of conservation areas, assistance in demonstrating special interest and articulating character, guiding investment, and in developing a management plan.
- 10.13. An audit of existing conservation areas took place in 2019. A number of recommendations have been made following this audit, including reconsidering Article 4 Directions, updating Area Design Guides, and redefining conservation area boundaries.

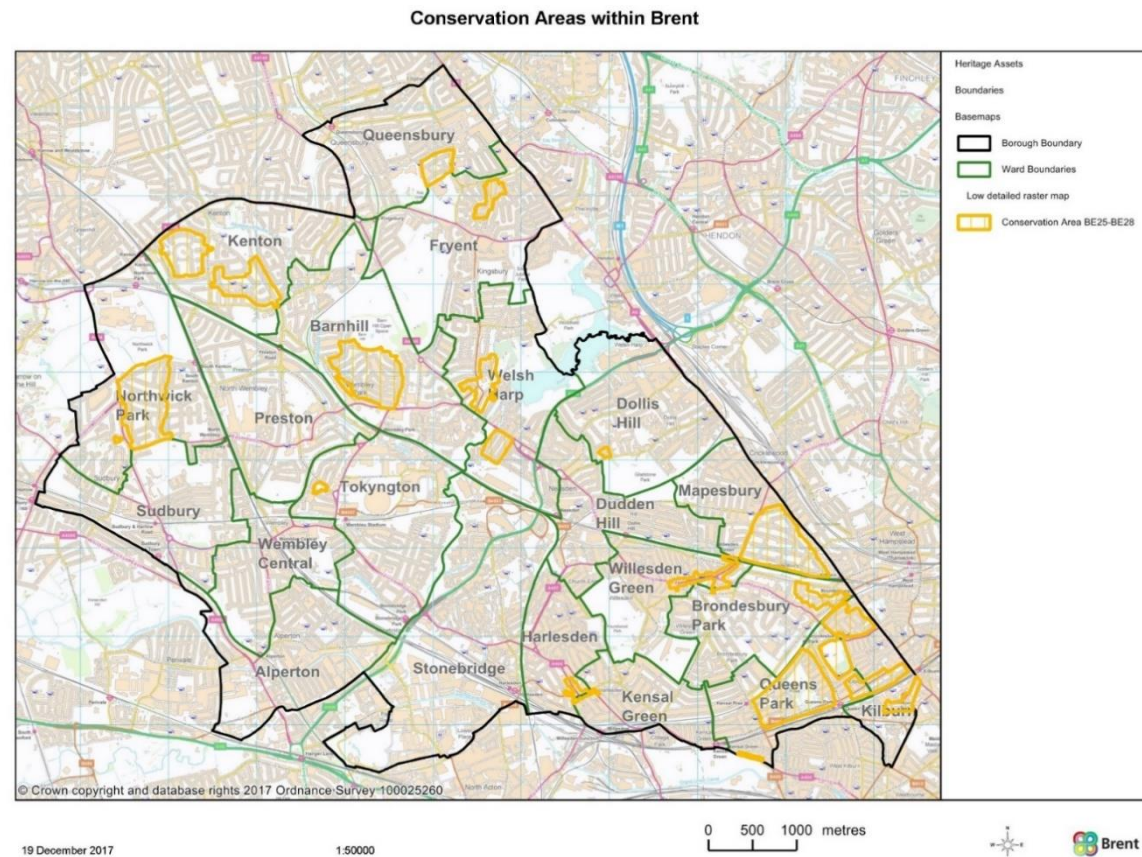


Figure 30: Location of Brent's Conservation Areas

Article 4 Directions

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

10.15. Brent's 2019 Historic Environment Place-Making Strategy recommends the undertaking of a full review of Brent's conservation areas to ensure they have special architectural and historical interest, including updating Article 4 Directions as necessary.

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

10.16. Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help highlight where development might affect heritage assets. There are four APAs within Brent, with their location depicted in Figure 31.

10.17. In addition to the 4 APAs, Brent has 4 sites of Local Archaeological Important (LAI).

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

10.19. Brent's Review is scheduled to be undertaken in 2049 and will include the 40 SAIs.



Figure 31: Location of Archaeological Priority Areas (APAs) within Brent

11. Landscape and Townscape

Evidence:

- Analysis of townscape analysis undertaken in 2007 for the Development Management Policies DPD Preferred Options
- All London Green Grid SPG, 2012, GLA
- All London Green Grid, DRAFT Brent Valley and Barnet Plateau Area Framework, GLA Design for London Borough of Brent
- Brent Historic Environment Place Making Strategy, 2019, Brent Council
- Tall Building Strategy, 2018, Brent Council
- Open Space Study, 2019, Brent Council

Evidence Gaps:

- None

11.1. The built environment is the setting for all the borough's activities in the urban area. The design and quality of Brent's built environment is not only about its appearance and attractiveness, but the overall 'form' of the development/environment and its use. The townscape quality varies across Brent. A townscape analysis undertaken in 2007 identified a number of areas within the borough that were judged to be of low townscape quality. These areas are highlighted in Figure 32.

11.2. Since this study was undertaken many areas, including South Kilburn, Stonebridge and Wembley Growth Area, have been subject to, or are in the process of significant development. This has resulted in improvements to the quality of the built environment and public realm. Alongside the Local Plan, the Council has produced a Tall Building Strategy to support the location of tall buildings in the most appropriate areas and clarify which areas are not, and a Historic Environment Place Making Strategy to set out how the historic environment can

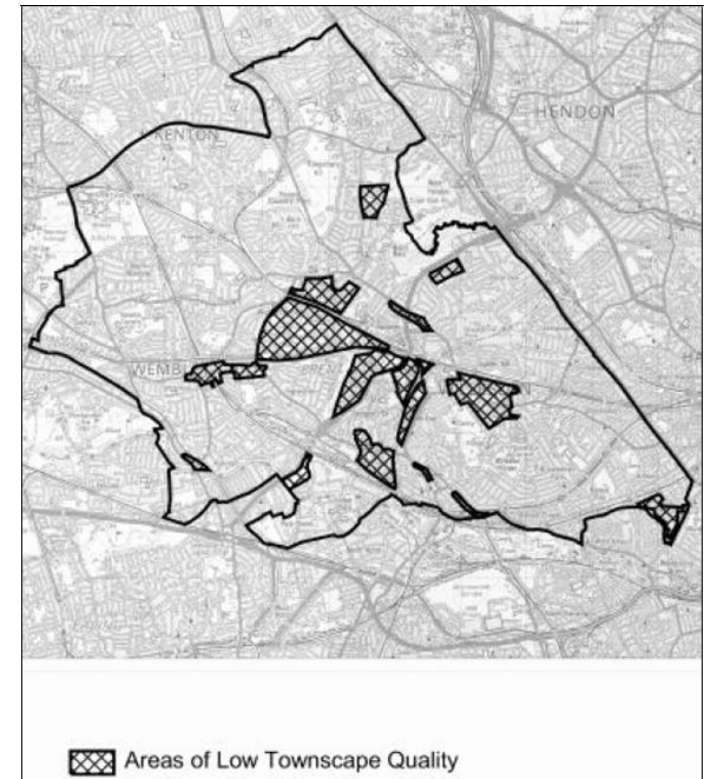
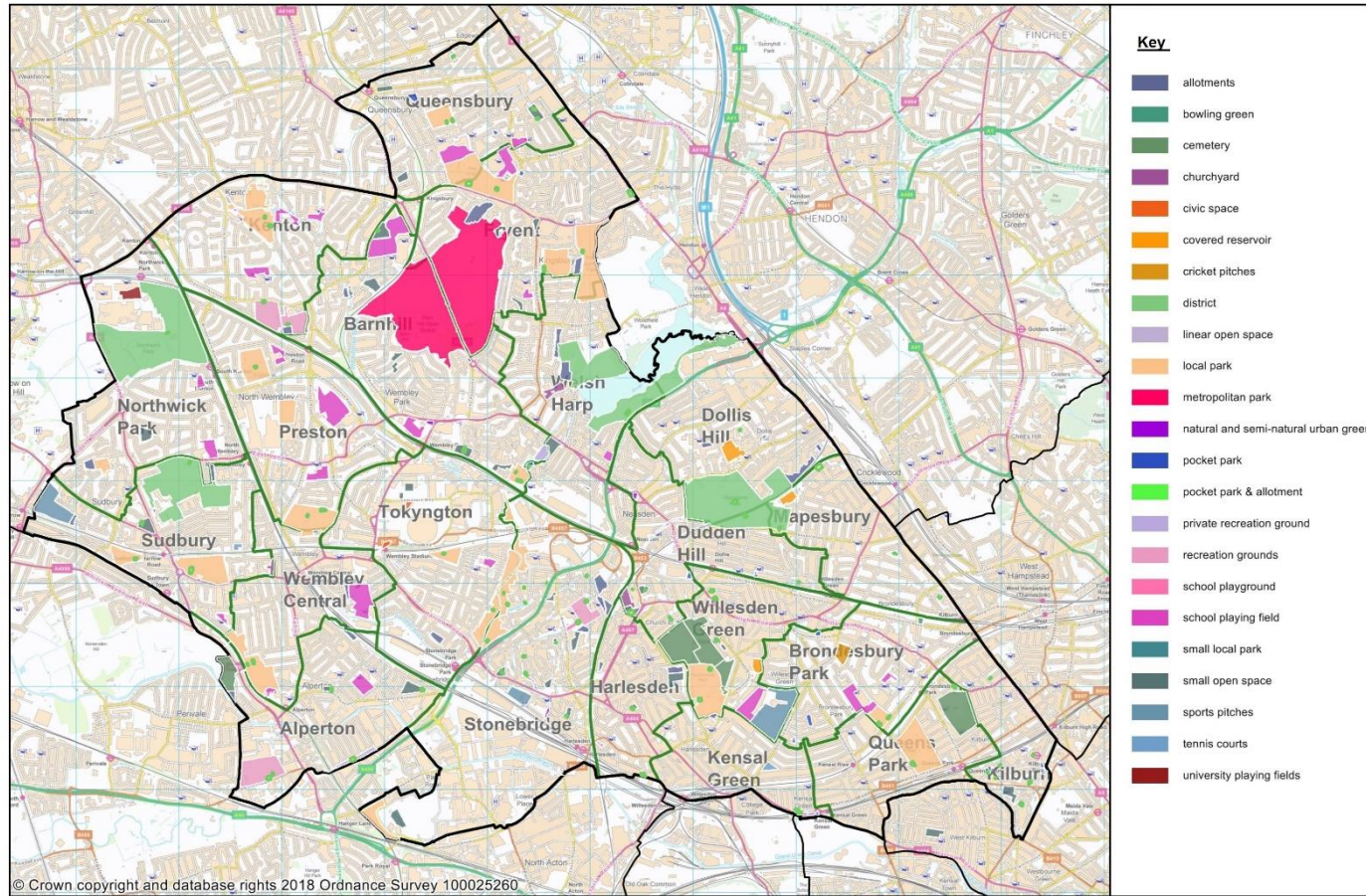


Figure 32: Areas of low townscape quality within Brent

play an important role in delivering regeneration in the Borough, through supporting the objectives of the Local Plan as well as promoting quality place-making.

- 11.3. The All London Green Grid SPG identifies that the majority of Brent is within the 'Brent Valley and Barnet Plateau' landscape area. To supplement the All London Green Grid SPG, six area frameworks have been produced to expand on the implementation points and strategic opportunities identified in the SPG. One of the six area frameworks produced covers the 'Brent Valley and Barnet Plateau'.
- 11.4. The key landscape zones in Brent is the Brent River Valley which is described as having a natural signature of meandering, shallow river bordered by diverse floodplain meadows and winding strips of damp woodland. It is noted that there are significant green infrastructure assets in the Brent Valley and Barnet Plateau, but many are hidden and isolated within a largely car bound urban fabric. Way-marked long distance walks – the London Loop and Capital Ring, and local riverside routes – The Dollis Trail from Brent Cross to the greenbelt, or the Brent River Walk between the A40 and the Thames provide connections between large open spaces of real distinctiveness and biodiversity. The Brent Reservoir by the Junction of the North Circular, A5 and M1 is of particular note – it is an SSSI, has a naturalised shoreline, accessible paths and facilities for bird watching and sailing.
- 11.5. Open Spaces form a key part of the borough's landscape. There are 180 open spaces within the borough, which cover 638.421 hectares. The currently level of open space provision within the borough is 1.91ha per 1,000 population. A breakdown of open spaces within Brent is Table 16, with their location depicted in Figure 33.

Open Spaces within Brent



1:51000

0 500 1000 metres



Figure 33: Open Spaces within Brent

Open Space Typology	No. of sites	Area(ha)	%of Open Space Area
Metropolitan Park	v	112.05	17.55
District Parks	5	161.47	25.29
Local Parks	21	154.52	24.20
Small Open Spaces	28	25.80	4.04
Pocket Parks	37	5.89	0.92
Linear Open Space	9	4.72	0.74
Public Parks Total	101	464.45	72.75
Allotments	22	18.45	2.89
Bowling Green	1	0.31	0.05
Cemetery	5	36.30	5.69
Churchyard	3	3.57	0.56
Civic Space	3	0.92	0.14
Covered Reservoir	3	5.63	0.88
Natural and Semi-Natural Urban Green Space (not including SINC sites)	3	0.80	0.13
Private Recreation Ground	1	1.33	0.21
Recreation Grounds	4	23.86	3.74
School Playground/School Playing Fields	26	56.59	8.86
Sport Pitches (not within public parks)	4	22.85	3.58
Tennis Courts	3	1.33	0.21
University Playing Fields	1	2.03	0.32
Total	180	638.42	100

Table 16: Provision of Open Space within Brent

12. Waste

Evidence

- Annual Monitoring Reports
- West London Waste Plan
- The London Plan (2016)
- The new draft London Plan (Intend to Publish) (2019)

Evidence Gaps

- None identified

12.1. The total amount of municipal waste collected in 2018/19 was 106,900 tonnes, a reduction of 0.7% from the previous year (107,683 tonnes in 2017/18). In 2018/19, 33% of the borough's waste was recycled and composted, which is below the London Plan target of 65% by 2030.

12.2. The new draft London Plan forecasts the amount of household, commercial and industrial waste by borough between 2021 and 2041. The plan requires waste planning authorities and industry to work in collaboration in order to conserve resources, reduce waste, increase material re-use and recycling and reduce waste going for disposal. The projections from the 2016 London Plan and the new draft London Plan are shown in Table 17 below. Please note that all figures are in a 1000 tonnes.

	2021 Household, Commercial and Industrial Waste	2041 Household, Commercial and Industrial Waste
Waste Arising Figures (projections) (2019 new draft London Plan)	259	274
Borough-level apportionments of household, commercial and industrial waste	412	437

Table 17: Waste targets for Brent

- 12.3. A Joint West London Waste London Plan, which was prepared by 6 West London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) to provide a planning framework for the management of waste, identifies sites that are allocated for waste management development in the plan area. In Brent, there are 12 existing safeguarded sites (identified in Table 18). Of these identified site, the Veolia Transfer Station in Alperton and Twyford Transfer Station in Park Royal are identified for increased capacity.

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

Table 18: Safeguarded waste sites within Brent

13. Transportation

Evidence

- Brent Long Term Transport Strategy 2015-2035
- Brent Cycle Strategy 2016-2021
- Brent Walking Strategy 2017-2022
- WebCAT, Transport for London
- TFL Road Safety fact sheets, 2017
- TFL Route performance results for London Borough of Brent, June 2019
- Parking Strategy, 2015, Brent Council
- WestTrans Delivery and Servicing Plan Guidance
- Brent Council Annual Parking Reports
- Brent Local Implementation Plan 2019-2041

Evidence Gaps

- None

13.2. As shown in Figure 34, the most popular mode of transport for Brent residents is the car, accounting for 41% of trips originating in Brent per day. The least popular mode of transport for Brent residents was taxi. When the figures are combined, public transport (rail, underground/DLR and bus) account for a significant portion of trips made per day by Brent residents²².

²² Brent Local Implementation Plan 2019-2041

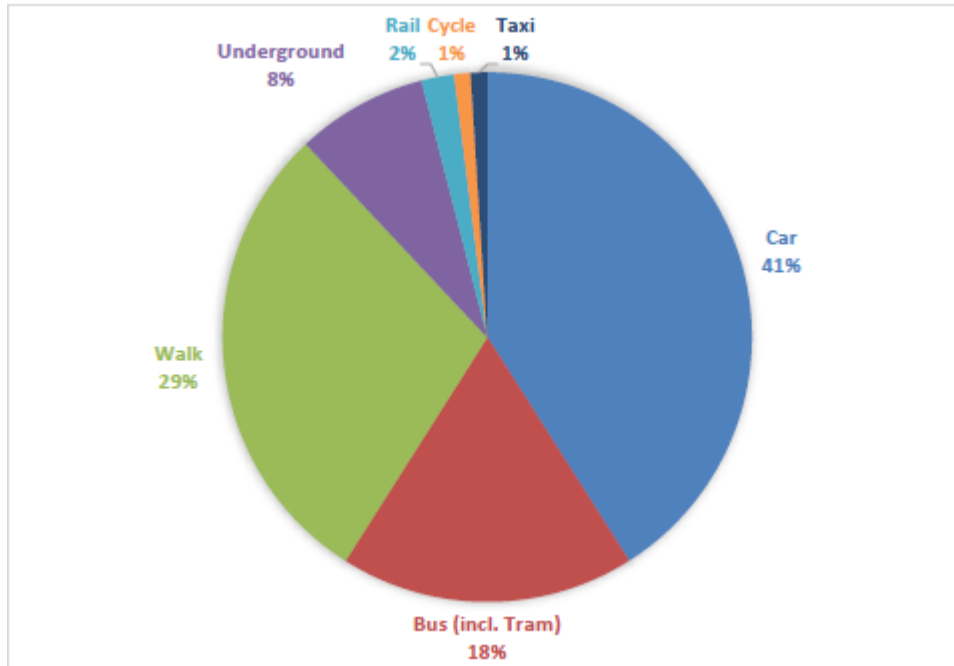


Figure 34: Mode share of Trips Originating in Brent (2017)

Road

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

- 13.4. In 2013, 846 million vehicle kms were travelled in Brent, which equate to 2.9% of all London traffic. Half of all car journeys in Brent are less than five kilometres. ²³Brent is expecting high levels of growth over the next 20 years, which will put more pressure on the road network.
- 13.5. A key problem associated with car traffic within the borough is congestion. High levels of congestion reduce the quality of life of Brent residents and have a negative effect on economic growth. Congestion also suppresses the uptake of active travel modes by degrading the environment for cyclists and pedestrians. As shown in the following figures, there are a number of areas within Brent that have significant delays (during peak hours) as a result of congestion

Road Safety

- 13.6. As identified in the Council's Long Term Transport Strategy, there has been significant progress made in regards to road safety in Brent. Between 2004 and 2012, Brent saw 45% reduction in KSIs (killed or seriously injured) from road traffic collisions, which placed the borough 7th of the 33 London boroughs. During the same time period, London wide KSIs reduced by 28%. According to TFL Road Safety Fact Sheets, In Brent in 2017, 6 people were killed, 126 people were seriously injured, and 1026 were slightly injured. The total amount killed or seriously injured was the lowest since 2005.

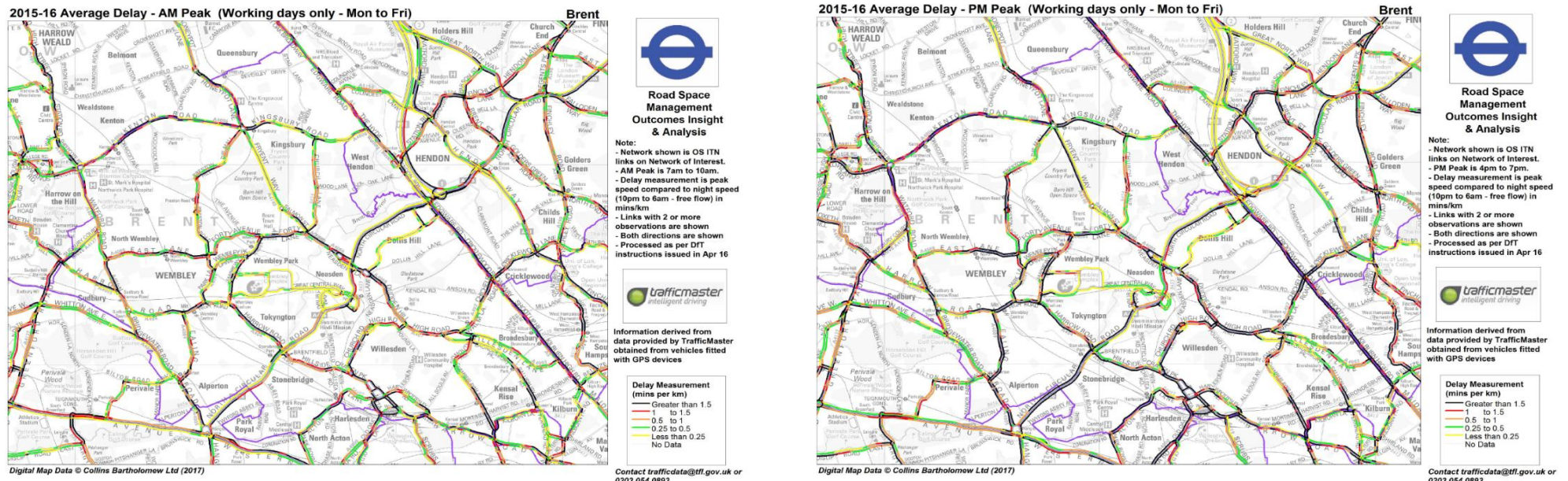


Figure 35: Congestion levels within Brent

Cycling

13.7. As shown in Figure 34, cycling only accounts for a small proportion of trips originating within Brent (1%). The Council seeks to increase this to 3% by 2020/21 and to 5% by 2025. The uptake of cycling varies within the borough; in the south of the borough cycling claimed 2-5% modal share journey, whereas in the north of the borough cycling only claimed 0-1% modal share journey. It is thought that around 32% of Brent households own at least one bicycle, according to the Brent Cycling Strategy. Brent has a large number of cycle parking spaces at stations, in high streets and other activity hubs. The Council aim to increase provision by 1000 spaces by 2021. The Brent Cycle Strategy found that concerns over road safety is the biggest issue which prevents people from cycling.

13.8. Existing and proposed cycle route in Brent are shown in Figure 36. Brent has two radial cycle routes and one orbital route forming part of the 900km London Cycle Network Plus (LCN+). Transport for London is also implementing a Quietway programme, which has connected Regent's Park and Gladstone Park, and will connect Kensal Town to Yiewsley (via Wembley).

Walking

13.9. One of London's metropolitan walking routes passes through Brent. The Capital Ring, a 78 mile walking route which encircles London, connects South Kenton to Welsh Harp. As shown in Figure 34, pedestrian mode share accounted for 26.27% of all trips made by residents within the borough, and 26.78% of trips originating within the borough per day. Through the implementation of the walking strategy, the Council aims to increase this to 30% by 2021/22. The Brent Walking Strategy identified that poor quality or excessive street furniture such as advertising boards outside businesses, high vehicle speeds on local streets and insufficient lighting and footpaths through parks were identified as specific barriers to walking.



Figure 36: Existing and proposed cycle routes within Brent

Between 2005 and 2015 the number of pedestrian casualties in Brent has fluctuated. Although the number of pedestrians receiving fatal injuries in collisions with vehicles has decreased slightly, it still remains high. Brent aims to achieve zero pedestrian fatalities by 2021/22 and a reduction of 30% in the total number of casualties

Public Transport

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

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

13.11. Public transport accounts for 33% of trips made by Brent residents each day, and 31% of trips originating within Brent each day. It is expected that the use of public transport will remain stable up to 2030. However, if adequate interventions are made, private vehicle mode share is expected to decline from 41% in 2013 to 30% in 2030.

13.12. As shown in Figure 37, there are areas within Brent that have relatively high PTAL level i.e. Wembley and Kilburn. There are also areas which have poor access to public transport, and therefore low PTAL levels, such as Dollis Hill and Welsh Harp.

13.13. The mean excess waiting time for high-frequency bus routes has remained fairly consistent, remaining stable at 1 minute in 2010/11 and 1 minute between April and June 2019.²⁴

13.14. Major public improvement works have been undertaken. The most notable being the Wembley stadium and Wembley station. In addition, due to the increase in patronage on the London Overground, there has been considerable investment in new trains, platform extensions and station upgrades to meet demand. The implementation of the London Bus Priority Network (LBPN) has resulted in major benefits in Brent particularly on the Edgware Road and Harrow Road corridors. However, even with all these improvements, Figure 37 illustrates that there are still areas with poor public transport accessibility (those in dark blue), showing that significant areas remain deficient particularly to the north. It should be noted that the draft London Plan contains a

²⁴ TFL Route performance results for London Borough of Brent, June 2019

commitment to introducing passenger trains on the Dudden Hill Freight Line, which is being referred to as the West London Orbital. This should result in improvements to PTAL levels within the eastern region of the borough.

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

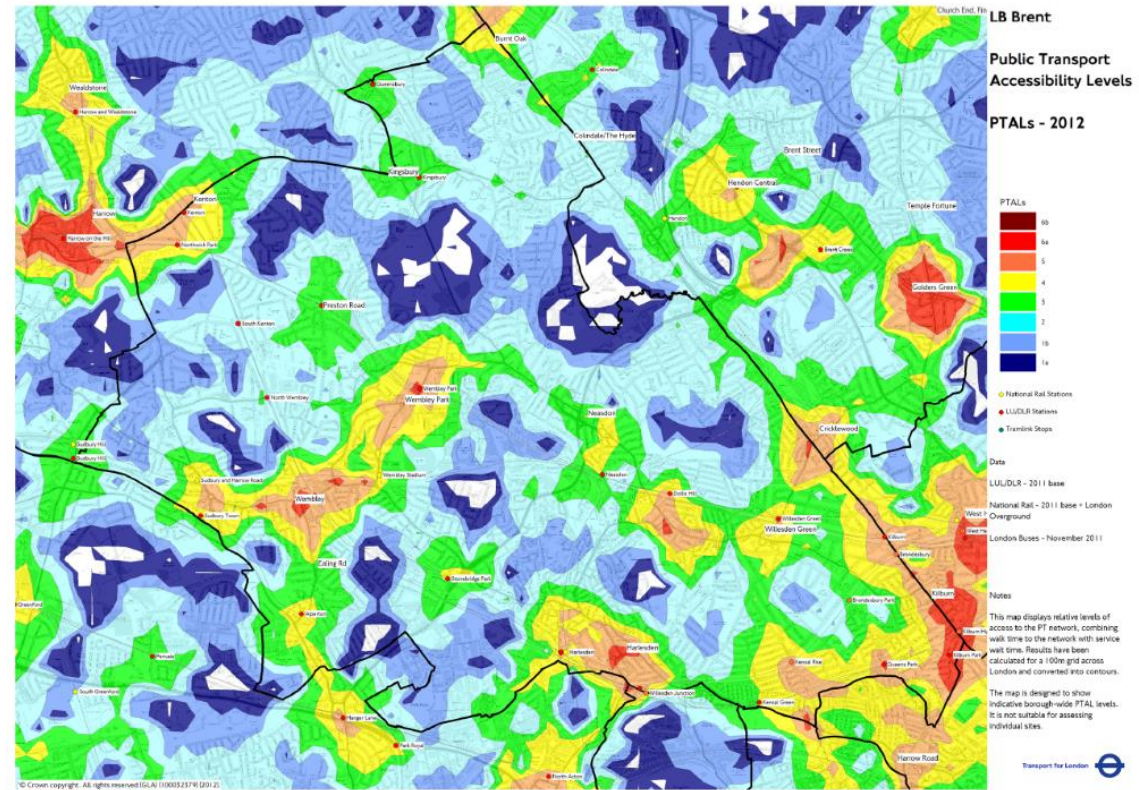


Figure 37: PTAL levels within Brent

Freight

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

Parking

- 13.17. Parking is an important part of the transport infrastructure for many Brent residents and can have a significant impact on quality of life. Demand for parking in Brent is high, as in other London Boroughs. The Council seeks to manage this demand through the use of parking controls and traffic regulations.
- 13.18. According to the Brent Parking Strategy (2015), a survey in 2014 indicated that there were approximately 88,000 on-street parking places, both controlled and uncontrolled, available across the whole of Brent. Over large areas of the borough, particularly in the north and west, on-street parking remains available to motorists free of charge or restriction. In these areas, there are only limited lengths of kerbside waiting and loading restrictions in place on-street including those necessary to ensure road safety. The main demand for both on-street and off street parking in the borough's town centres occurs from Monday to Saturday across the working day between 8am and 6:30pm, on Sundays during the retailing hours of 10am-5pm, and during special event.
- 13.19. The Council operates 11 public car parks across the borough which has a total of 714 spaces. There are also over 700 spaces in privately owned car parks.
- 13.20. The Council has introduced a number of measures to manage the high demand for kerb space. Parking in the south-eastern part of the borough, is managed through Controlled Parking Zones. Other parts of the borough also have residential controls; these typically cover areas near high street locations and/or tube and railway stations. The Council manages 40 Controlled parking Zones (CPZs) across the borough, serving 56,000 households with over 33,000 on-street parking spaces. Specific times of operation vary but the majority are in operation through the day, from Monday to either Friday or Saturday.

14. **Noise**

Evidence

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

- 14.1. There are numerous sources of noise pollution in the borough. These sources include ambient noise, which is long-term 'background' noise, which can originate from transport and industry. These ambient noises can be supplemented by more periodic local (or neighbour) noise such as construction works, roadworks, late night venues, public events, street activities and ventilator/extractor units.
- 14.2. Areas adjacent to the North Circular Road in Brent have been identified as amongst the most affected by traffic noise in the UK. In addition, development around Wembley can be impacted by noise on event days at the National Stadium.
- 14.3. In light of the guidance contained in the Noise Action Plan: Agglomerations published by DEFRA in January 2015, the Council has identified quiet areas. These are areas of tranquillity, usually open spaces and green network areas, which have remained relatively undisturbed by noise and have recreational and amenity value for this reason. The boundaries of the borough's Quiet Areas are consistent with the open space designations for Fryent Country Park, the Welsh Harp, Roundwood Park/Willesden New Cemetery, Paddington Cemetery and Alperton Cemetery.

15. Local Economy

Evidence:

- Brent Employment Land Demand Study, URS, 2015
- ONS Annual Population Survey
- Retail and Leisure Needs Study, 2018, Urban Shape
- Brent Workspace Study, 2017, Regeneris
- GLA Brent London Borough Employment
- Brent Responsible Growth Strategy 2018-2038, RGS, May 2018
- Annual Monitoring Reports
- NOMIS Official Labour Market Statistics
- NOMIS Labour market profile (Brent)

Evidence Gaps:

- None identified

15.1. Table 19 compares the occupation structure of Brent's residents with the London averages from April 2018 – March 2019. Brent's total workforce is approximately 164,830. Standard occupational classification (SOC) 2010 major groups 1-3 forms the largest proportion of Brent's resident workforce, totalling 72,800 which is equivalent to 44.2%. However, the proportion of the resident workforce in SOC major groups 1-3 is significantly lower than the London average, which is 57.8% of all persons in employment. There are a number of SOC groups that are over-represented in Brent, in comparison to the London average. For example, the skilled trade occupations accounted for 9.9% of the borough's resident workforce, compared to 7% across London.²⁵

²⁵ NOMIS Official labour market statistics

SOC Major Group	Occupation	Brent (number)	Brent (%)	London (%)
1	Managers and senior officials	15,800	9.5	12.4
2	Professional occupations	33,330	20.2	26.5
3	Associate professional and technical	23,800	14.4	18.6
4	Administrative and secretarial	12,100	7.3	9.1
5	Skilled trades occupations	16,400	9.9	7
6	Caring, Leisure and Other Service Occupations	14,200	8.6	7.2
7	Sales and Customer Service	14,100	8.5	5.7
8	Process Plant and Machine Operatives	12,100	7.3	4.6
9	Elementary Occupations	23,000	14	8.4
	Total	164,830	100	100

Table 19: Occupation structure of Brent's residents

15.2. As identified in Figure 38, Brent's key employment sectors are 'Motor Trades' (16%), 'Retail' (10%) and 'Education' (9%) and 'Business Administration and Support Services' (9%).²⁶

²⁶ NOMIS official labour market statistics

Brent Employment Sectors (2017)

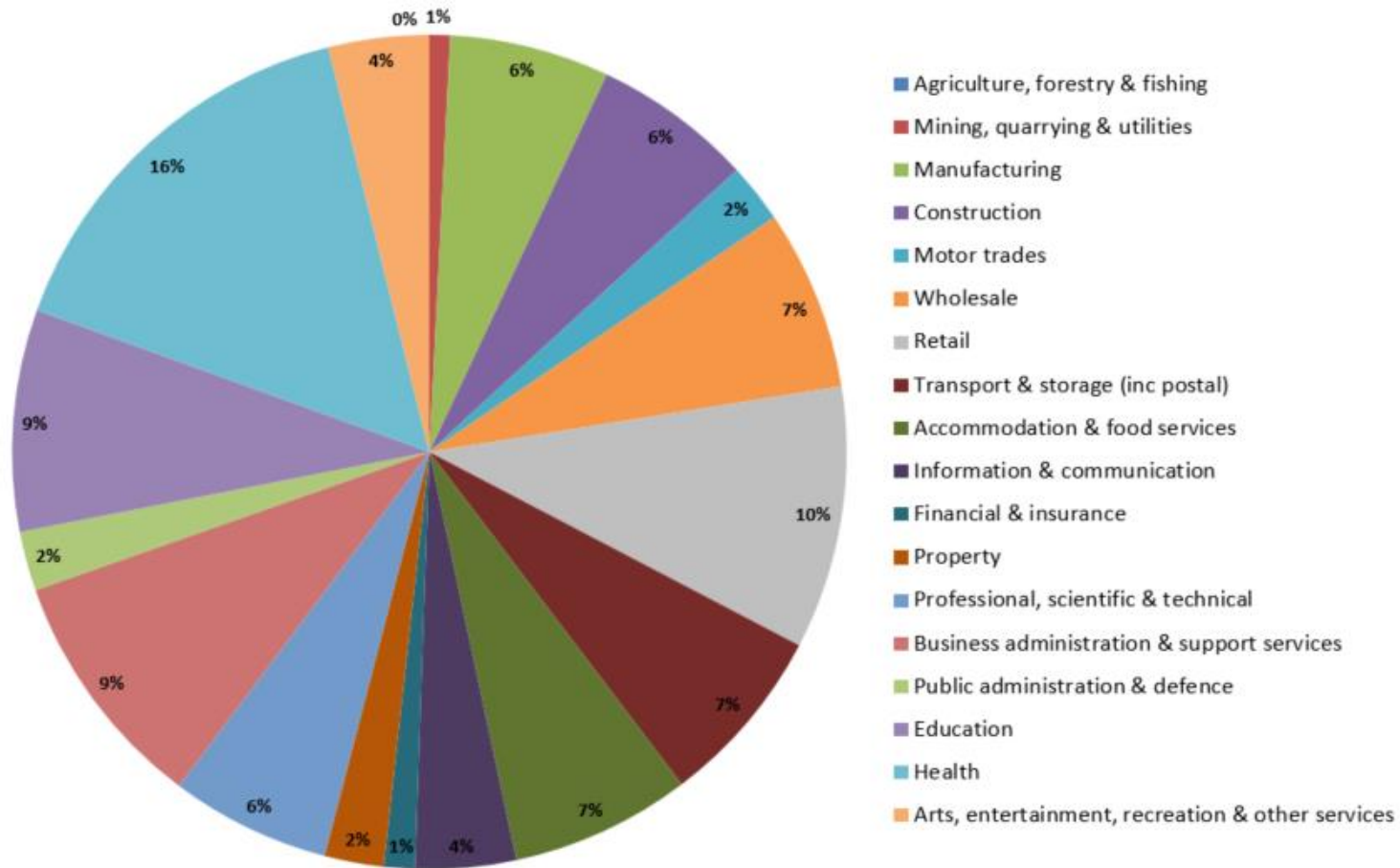


Figure 38: Brent's employment sectors

15.3. Brent's designated employment sites comprise Strategic Industrial Land (SIL), which are designated in the London Plan due to their importance to the London Economy, and Locally Significant Industrial Sites (LSIS), which are of strategic importance to employment in the borough. The location of the borough's strategic SIL and LSIS are depicted in Figure 39. In addition, there are smaller employment sites distributed throughout the borough, referred to as Local Employment Sites. There is currently a total of 395ha of land current in active industrial use in Brent. According to the Employment Land Demand Study (2015), SIL accounts for around 75% of the borough's total industrial land portfolio, LSIS around 14% and the remainder is contained within Local Employment Sites.

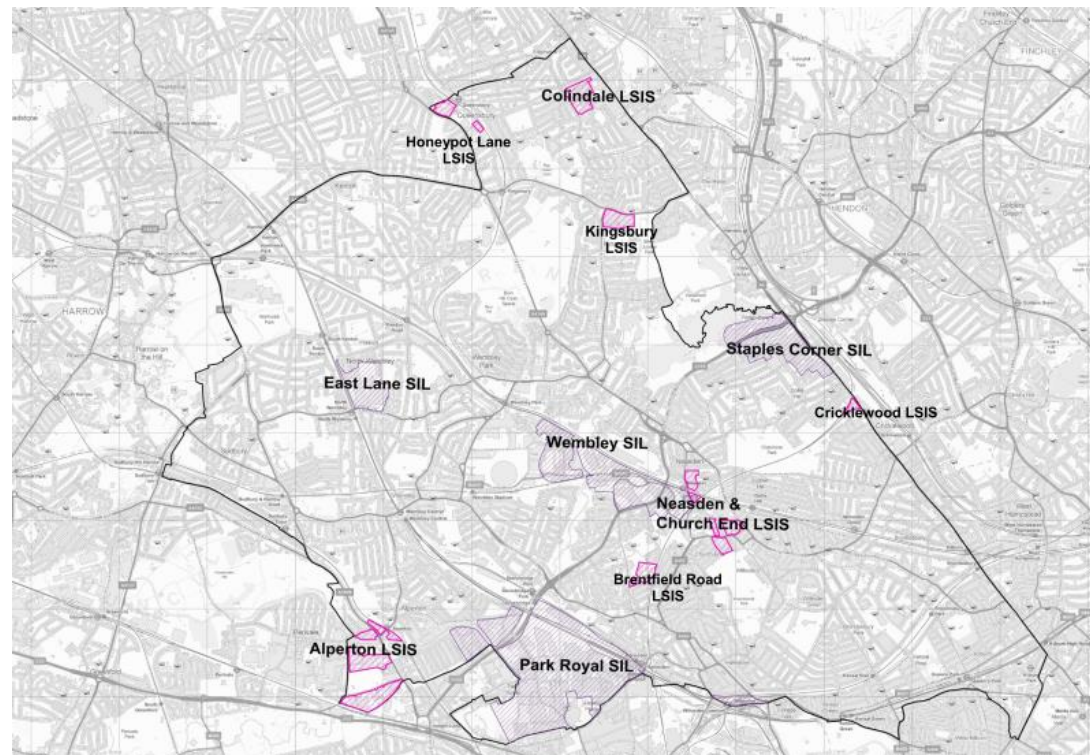


Figure 39: Location of SIL and LSIS in Brent

15.4. The Employment Land Demand Study identified that there is approximately 27,700 sqm of gross office B1a floorspace in Brent's town centres, and a further 74,000 sqm in predominantly in industrial clusters. It also identified additional demand for between 32,600 sqm and 52,350 sqm of office floorspace in the borough to 2029. However, prior approvals have resulted in a net loss of office floorspace. For example, during the 2017/18 monitoring period, there was a net loss of 6,018sqm of office floorspace, 52% of which was lost due to prior approvals²⁷ resulting in the conversion to residential, redevelopment to residential and to a lesser extent conversion to employment uses or mixed use development.

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

15.6. The size of firms operating within Brent are identified in Table 20. Micro businesses (those which employ up to 9 people) form a significant proportion of the borough's business stock – this type of business made up 89.5% of all businesses within the borough in 2018. There has been steady growth in the amount of micro businesses within the borough since 2015. Brent has a greater share of micro businesses in comparison to the London average. Small and medium sized businesses represent a small share of the total stock of businesses within Brent. Large businesses represent the smallest share of business stock within the borough, which is similar trend to that across London.

Local Businesses	Brent (Numbers)				Brent (%)				London (%)			
	2015	2016	2017	2018	2015	2016	2017	2018	2015	2016	2017	2018
Micro (0-9)	12835	13815	14620	14730	88.5	89.3	89.6	89.5	86.2	86.8	87.3	87.1
Small (10-49)	1310	1285	1320	1350	9	8.3	8.1	8.2	11	10.5	10.1	10.3
Medium (50-249)	305	315	310	325	2.1	2	1.9	2	2.4	2.3	2.2	2.2
Large (250+)	50	50	60	55	0.3	0.3	0.4	0.3	0.4	0.4	0.4	0.4

Table 20: Size of firms within Brent

²⁷ Brent Annual Monitoring Report, 2017/18

- 15.7. The percentage of economically active people within Brent between Oct 2018 and Sept 2019 was 77.1%. The economic activity rates between male and female varies significantly – the male activity rate was 84.6% compared to 68.9% for females. The male activity rate was slightly higher than the London average and the female activity rate lower than the London average. In the same year ending Sept 2019, the unemployment rate in Brent was 4%, which was lower than the London average (4.6%).²⁸ In December 2015, the youth unemployment claimant rate was 2.6, which is lower than the London average of 3.6.
- 15.8. In 2019, the average gross weekly pay in Brent was estimated to be £610.20 for full time workers. This compares to a weekly London average of £699.20.²⁹
- 15.9. According to the GLA London Borough Profiles, unlike employment rates, the difference between the gross annual pay for male and females is relatively small – the gross annual pay for males in 2016 was £30,129 and the gross annual pay for females was £29,600. However, the gross annual pay for males is significant lower than the London average of £36,697. There is not a significant difference between the gross annual pay for females in the borough and the London average for females (£30,979).

²⁸ NOMIS Labour market profile, Brent

²⁹ NOMIS Labour market profile, Brent

16. Deprivation

Evidence:

- Index of Multiple Deprivation, 2019
- Joint Strategic Needs Assessments, 2015
- Sub Regional Fuel Poverty Data (2017), Department for Business, Energy and Industrial Strategy 2019
- End Child Poverty (endchildpoverty.org.uk)
- Children in Poverty for Boroughs and Wards in London dataset 2006-2016, HMRC, updated 2019
- Brent Inclusive Growth Strategy Research Base, 2019

Evidence Gaps:

- None identified

16.1. The Indices of Multiple Deprivation (IMD) 2019 is a measure of relative deprivation of small areas (referred to as Lower Super Output Areas (LSOA)) within England. It combines information from 7 domains, each of which measure a different type or dimensions of deprivation, to provide an overall relative measure of deprivation.

16.2. Brent's national rank was the 49th most deprived borough in the UK. Brent has 173 LSOAs, of which 10 are within the 10% most deprived LSOAs in the country. Brent does not have any LSOAs that are within the 10% least deprived LSOAs in the country. In the domain 'Barriers to housing and Services', Brent was ranked the 4th most deprived borough.

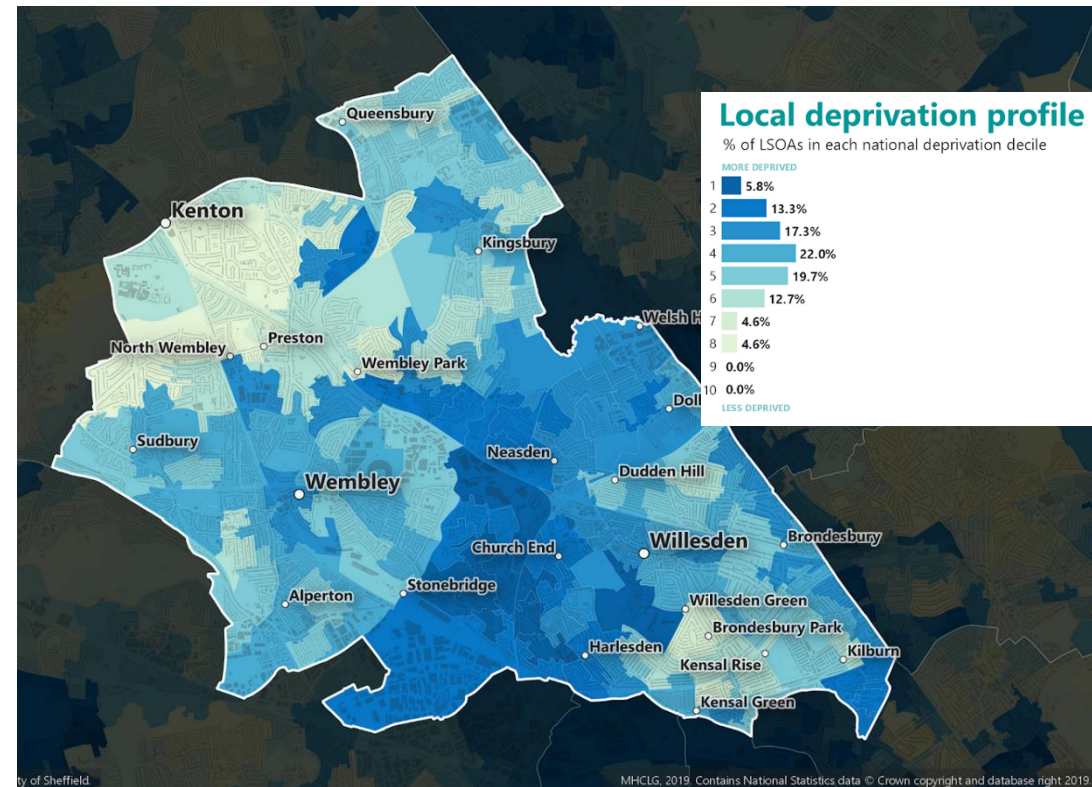


Figure 40: Brent's IMD, 2019

16.3. In 2015, the claimant rate for Housing Benefit was 30% in Stonebridge and Harlesden, 6% in Northwick Park and under 5% in Kenton. The rate for out of work benefits was nearly 29% in Harlesden and Stonebridge, under 9% in Northwick Park and under 8% in Kenton. As of March 2018, there were 34,488 housing benefit claimants in Brent.³⁰

16.4. Households are considered by the Government to be in fuel poverty if they would have to spend more than 10% of their household income on fuel to keep their home in a ‘satisfactory’ condition. In England, this is defined as 21°C in the living room and 18 C in other occupied rooms. According to the Department for Business, Energy and Industrial Strategy, in 2017, it was estimated that 16,929 households were in fuel poverty in Brent, which equates to 14.9% of all households. This is significantly higher than both the London average (11.8%) and England average (11.0%) in 2017 and represents an increase since 2015.

16.5. As indicated by Table 21, levels of child poverty in Brent 2011-2016 were higher than the London and England average. The ‘Children in Low-Income Families’, which is the Government’s current preferred measure of child poverty, shows the proportion of children living in families in receipt of tax credits where their reported income is less than 60% of the UK median income. This measure provides a broad proxy for relative low income child poverty as set out in the Child Poverty Act 2010.

	Children in Child Benefit Families						% of children in low-income families					
	Brent		London		England		Brent		London		England	
	U16	All children	U16	All children	U16	All children	U16	All children	U16	All children	U16	All children
2011	63615	73405	1611800	1853670	9855830	11537505	28.1%	28.8%	26.5%	26.7%	20.6%	20.1%
2012	65345	75315	1636025	1880560	993640	11602370	24.8%	25.0%	23.7%	23.5%	19.2%	18.6%
2013	66265	76570	1641015	1892710	9957705	11649215	21.0%	21.3%	21.8%	21.8%	18.6%	18.0%
2014	66455	76890	1635720	1888430	9956030	11638995	23.4%	24.3%	23.4%	23.9%	20.1%	19.9%
2015	66760	77200	1633390	1881900	9969960	11603520	17.6%	18.2%	18.8%	19.2%	16.8%	16.6%
2016	67330	77815	1638365	1884170	10017620	11609460	18.0%	18.9%	18.8%	19.3%	17.0%	17.0%

Table 21: Levels of child poverty within Brent

³⁰ Brent Inclusive Growth Strategy Research Base, 2019

16.6. Table 22 shows levels of child poverty at a ward level, published by End Child Poverty (May 2019). As shown in the table, the highest rates of child poverty in the borough are in Dollis Hill, Alperton and Kilburn which after housing costs scored 51%, 50% and 49% respectively. The wards which have the lowest rates of Child Poverty are Northwick Park, Queens Park and Kenton, which after housing costs scored 32%, 32% and 33% respectively. Table 22 also highlights the impact that housing prices have on child poverty with rates increasing over 10% in all wards within the borough.

Local Authority and wards	Before Housing Costs	After Housing Costs
Brent	22.31%	43.19%
Alperton	23.3%	50%
Barnhill	23.1%	44%
Brondesbury Park	17.4%	34%
Dollis Hill	22.2%	51%
Dudden Hill	25.3%	46%
Fryent	21.8%	44%
Harlesden	26.0%	48%
Kensal Green	23.2%	39%
Kenton	18.5%	33%
Kilburn	23.2%	49%
Mapesbury	23.6%	42%
Northwick Park	20.1%	32%
Preston	24.8%	43%
Queens Park	17.5%	32%
Queensbury	22.6%	42%
Stonebridge	16.8%	48%
Sudbury	21.1%	42%
Tokyngham	23.5%	46%
Welsh Harp	23.5%	48%
Wembley Central	23.7%	47%
Willesden Green	27.4%	47%

Table 22: Levels of child poverty at ward-level

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

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

16.8. To achieve the above vision, the strategy identified the following six priorities: 1) Reduce poverty levels of children living in low income households, 2) Supporting troubled families, 3) Reduction in the NEET group, 4) Improve financial capacity of parents, 5) Support looked after children and children at the edge of care, and 6) Improve the health and wellbeing of children with a focus on reducing obesity, tooth decay and poor mental health.

17. Housing

Evidence Base:

- 2001 and 2011 Census
- Housing Benefit caseload statistics, Department for Work and Pensions, updated August 2018
- London Borough of Brent Strategic Housing Market Assessment, SHMA, 2018
- GLA Brent Borough Profile, 2017
- Average yearly and weekly gross earnings, ONS, 2019
- GLA short term population and household projections, 2016
- House Price Index, House Price Statistics, HM Land Registry 2019
- West London Gypsy and Traveller Accommodation Assessment, 2018, ORS
- Registered Provider and Local Authority average rents, MHCLG, 2018
- Brent Inclusive Growth Strategy Research Base, 2019

Evidence Gaps:

- None identified

17.2. The 2011 Census counted 110,286 households in Brent, an increase of 10.3% from the previous census. The 2017 GLA short-term trends estimate that in 2019, there will be 125,929 households in the borough. The GLA estimate that the number of households in Brent is expected to increase to 168,376 by 2050.

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

17.4. As shown in Table 23, there is variation in the housing stock across the borough. Within the more urban areas of the borough, which are typically within the southern and central wards (i.e. Wembley Central, Tokyngton, Kilburn and Willesden Green), flats form the highest proportion of the wards housing stock. As you move northwards through the borough, the more suburban wards (i.e. Northwick Park, Fryent and Kenton) have a significant proportion of their housing stock formed of houses.

Wards	Flat	House	Maisonette	Other
Alperton	54.9%	44.0%	0.9%	0.3%
Barnhill	45.3%	49.4%	3.2%	2.2%
Brondesbury Park	67.9%	27.4%	3.9%	0.8%
Dollis Hill	44.4%	52.7%	2.7%	0.2%
Dudden Hill	48.7%	47.1%	3.8%	0.4%
Fryent	41.0%	55.3%	2.3%	1.3%
Harlesden	73.2%	19.5%	6.0%	1.3%
Kensal Green	66.4%	28.9%	3.6%	1.0%
Kenton	20.9%	75.2%	0.5%	3.4%
Kilburn	76.9%	8.9%	13.4%	0.7%
Mapesbury	75.7%	18.9%	4.4%	1.0%
Northwick Park	23.9%	67.9%	1.5%	6.8%
Preston	40.6%	55.7%	2.1%	1.7%
Queens Park	60.2%	32.3%	5.6%	1.9%
Queensbury	38.6%	55.4%	5.6%	0.4%
Stonebridge	62.6%	30.8%	6.0%	0.5%
Sudbury	48.6%	43.6%	2.2%	5.6%
Tokyngton	80.2%	19.3%	0.2%	0.3%
Welsh Harp	44.5%	47.8%	1.5%	6.3%
Wembley Central	64.5%	33.0%	2.1%	0.3%
Willesden Green	75.5%	19.2%	4.5%	0.7%
Grand Total	58.9%	35.8%	3.8%	1.5%

Table 23: Housing stock within Brent

17.5. The 2018 SHMA also identified the tenure mix and size for market and affordable housing need in Brent between 2016-41 (Table 24). It stated that there is “a significant need for family sized housing to be provided as part of any housing mix. The high need for larger affordable housing units is driven by a need to address overcrowding for those in need of affordable housing. “The SHMA also indicated that there is likely to be a “continued (and possibly growing) role for HMOs”.

	Brent Total	Percentage of OAN (%)
Market Housing		
1 bedroom	3700	7.7
2 bedrooms	5300	11.0
3 bedrooms	13500	28.1
4 bedrooms	3300	6.9
5 bedrooms	100	0.2
Total Market Housing	25,900	54
Affordable Housing		
1 bedroom	4200	8.8
2 bedroom	9000	18.8
3 bedroom	5800	12.1
4 bedroom	2500	5.2
5 bedroom	600	1.3
Total Affordable Housing	22,100	46
TOTAL	48,000	100

Table 24: Tenure mix and size for market and affordable housing need in Brent, 2016-2041

Housing Delivery

17.6. The 2018 SHMA identifies that the “Full Objective Assessed Need for Housing in Brent to be to a rounded figure of 48,000 dwellings over the 25-year Plan period (2016-2041), which is equivalent to an average of 1920 dwellings per year. 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 yea, representing 46% of the OAN for Brent”. It should be noted that the total figure is lower than the current draft London Plan housing target for Brent (2,915 dwellings per annum). However, the 2018 SHMA notes that this figure is “a supply driven capacity one which would see some of the wider needs of West London met in Brent”.

17.7. As shown in the Figure 41, there has only just been a positive performance against the borough’s housing targets. Such a significant increase in completions in the 16/17 year is due to a large amount of student housing being completed within the Wembley area.³¹

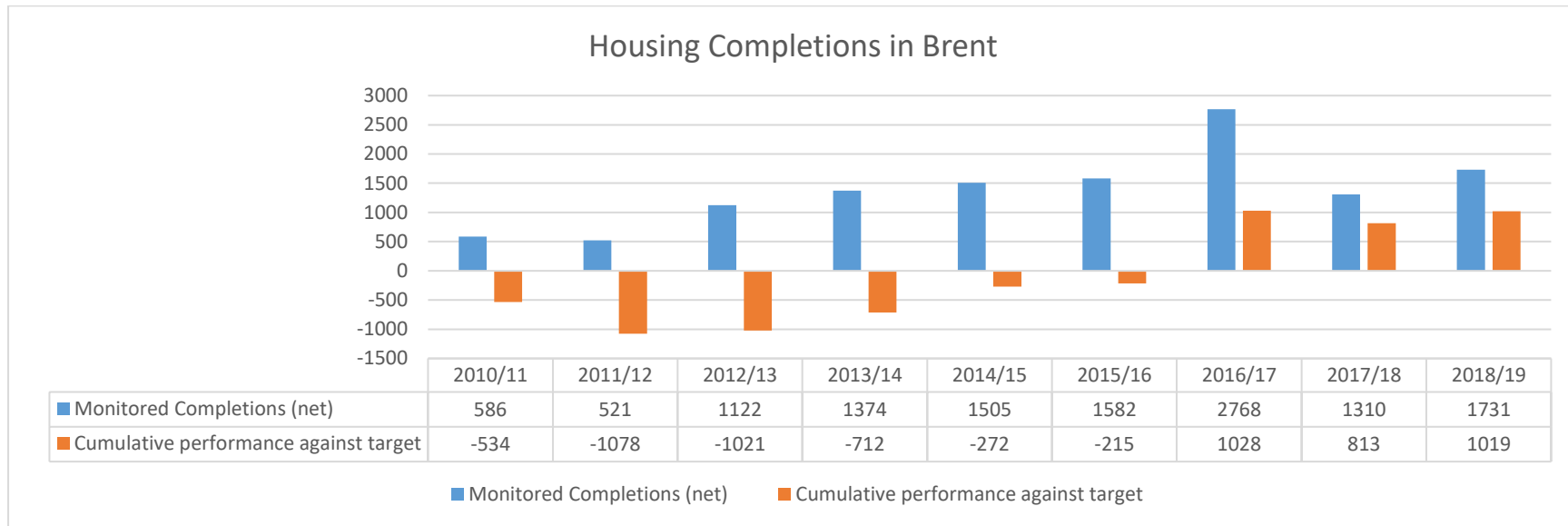


Figure 41: Housing completions in Brent

³¹ Brent Annual Monitoring Reports

Household Size

17.8. Between 2001 and 2011 the mean household size in Brent went from 2.6 to 2.8³². During this period all wards, other than Brondesbury Park, Northwick Park and Queens Park, had a positive change in household size. Alperton and Sudbury saw the greatest increases to 3.4 and 3.1 persons respectively, which equated to an increase of half a person per household.

17.9. As shown in Figure 42, it is predicted that by 2050 the average household size will fall to 2.3. The average household size in Brent is, and will continue to remain higher than the London average household size.³³

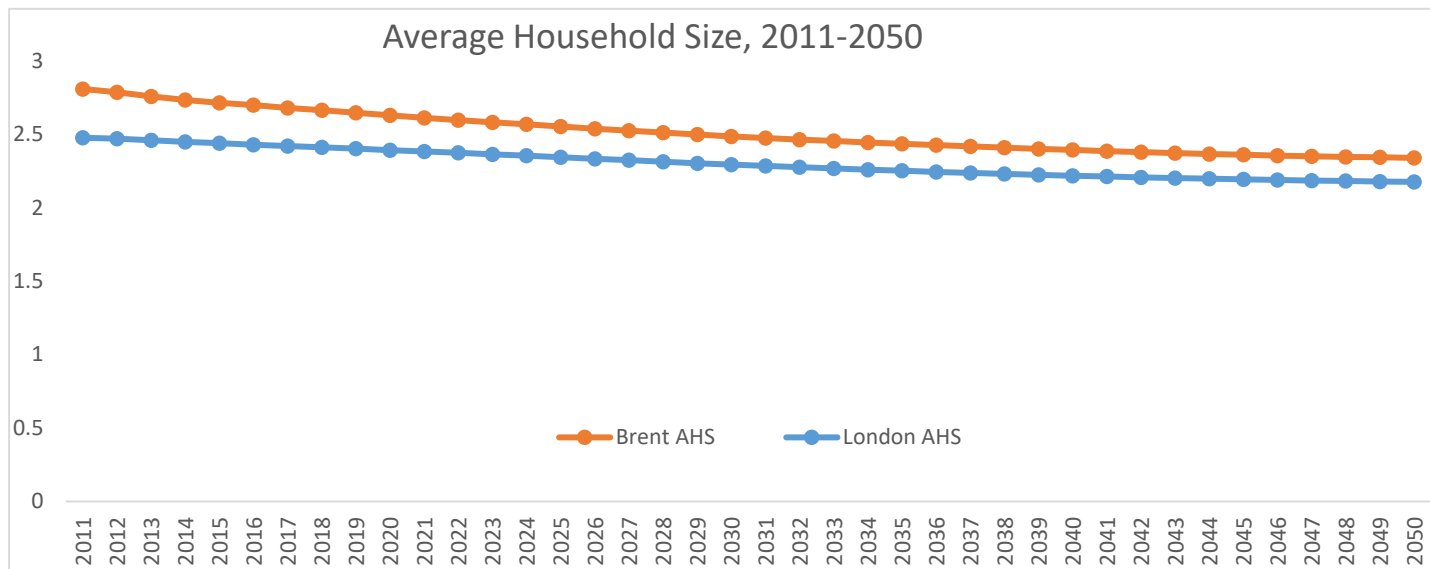


Figure 42: Average household size, 2011-2050

³² Population and Household Changes 2001 to 2011, Brent

³³ GLA short term household projections, 2016

Household Tenure

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

17.11. However, there are significant differences in the tenure pattern across the borough. Highest levels of owner occupation are seen in Kenton (73%) and Northwick Park (62%), with much lower levels in Harlesden (22%) and Stonebridge (18%). Similar contrasts exist for social and private renting. Stonebridge has the highest proportion of social renting (62%), followed by Kilburn (45%), while Tokyngton (12%) and Kenton (5%) have the lowest levels. Private renting is highest in Mapesbury (45%) and Willesden Green (43%) and lowest in Northwick Park (19%) and Stonebridge (15%).

Affordability

17.12. The predicted increases in London and Brent's population is likely to have implication on the affordability of housing. For the majority of the period between January 2013 and December 2019, median house prices in Brent have been above the London average and significantly above the England average house price. In the year ending December 2019 the median house price in Brent was £488,680, compared to a London median value of £475,458 and an England median value of £251,222.³⁴

17.13. As shown in Figure 44, the amount of people claiming housing benefit has steadily increased since 2008, but appears to have plateaued since 2015. Figure 43 shows that in May 2018 there was 34,581 housing benefit claimants, of which 52% were within the social rented sector and 48% were within the private rented sector.³⁵

³⁴ House Price Index, House Price Statistics, HM Land Registry

³⁵ Housing Benefit caseload statistics, DWP

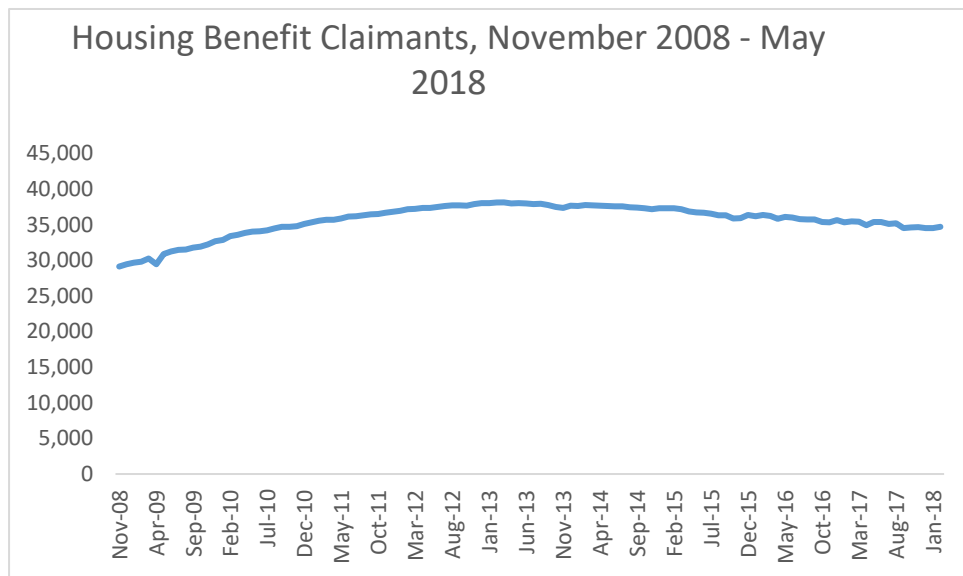


Figure 44: Housing benefit claimants, November 2008 - May 2018

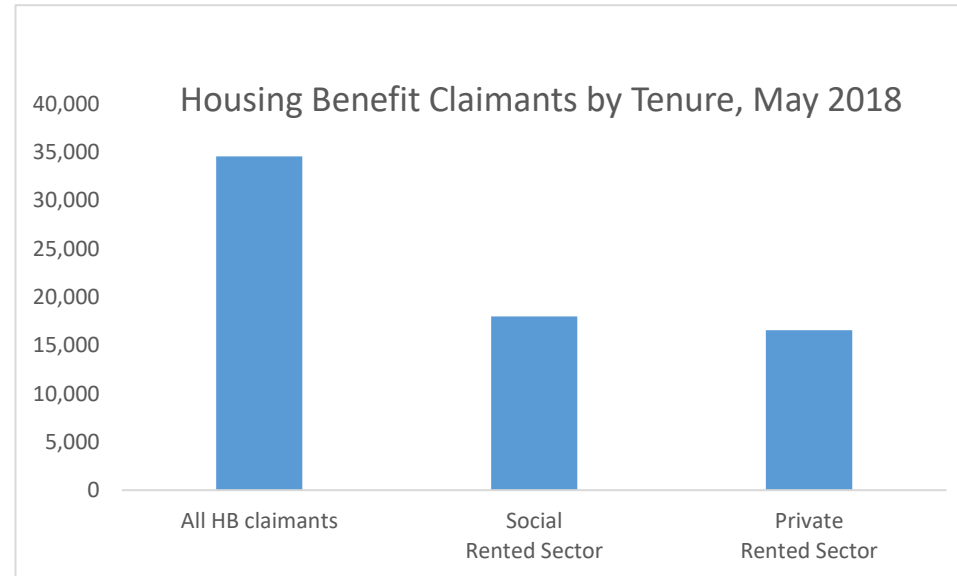


Figure 43: Housing benefit claimants by tenure, May 2018

17.14. The median monthly private rent in the 12 months to Quarter 1 of 2019 was £1,500³⁶, while the median average annual pay for a Brent resident, as at 2018, was estimated to be £23,423. Meanwhile, the median weekly gross pay is £480.00 (or £1951.92 per month).³⁷ An average monthly private rent of £1500 equates to 76.8% of the median gross salary. Most assessments of affordability suggest that rents at 35-40% salary are reasonable.

17.15. Even in the affordable housing sector, affordability is strained. The average weekly Registered Provider (RP) rent in 2018 was £125.60 while the average local authority rent was £113.66.³⁸ In 2015, the gross weekly salary for a household in the

³⁶ Valuation Office Agency, Q1 2019

³⁷ Average yearly and weekly gross earnings, ONS

³⁸ Local Authority and Registered Provider average rents, MHCLG, 2018

lowest 10% of earners – a category into which many social housing tenants fall – was £141.40, representing 87.1% of earnings at that time, and representing 85.8% of earnings in 2011. Although the change is not as marked as in other sectors, there is still upward pressure on rents increasing reliance on housing benefit.

17.16. As of April 2019, there were 3161 households in bands A-C on Brent's housing register (those considered to be in housing need).³⁹

17.17. There is one gypsy and traveller site in the borough at Lynton Close. According to the West London Gypsy and Traveller Needs Assessment (2018), there were no households interviewed in Brent that met the PPTS planning definition and as such there is no current or future need for additional pitched in the London Plan period to 2041. However, it was not possible to determine the PPTS planning status of 11 households at Lynton Close (unknown Gypsies and Travellers), and the needs of these households still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and may meet the PPTS definition. Should further information be made available to the Council that would allow for the PPTS definition to be applied to these unknown households, the overall level of need could rise up to 4 pitches from new household formation. There were no Travelling Show-people identified in Brent.

³⁹ Brent Inclusive Growth Strategy Research Base, 2019

Appendix 2 – Relevant Plans, Programmes and Policies

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

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
<p>European Directive: Environmental Noise Directive 2002/49/EC</p>	<p>The aim of the Environmental Noise Directive (END) is to “<i>define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise</i>”. The directive also aims to provide a basis for developing community measures to reduce noise emitted by the major sources, in particular road and rail vehicles and infrastructure, aircraft, outdoor and industrial equipment and mobile machinery.</p> <p>The Environmental Noise Directive focuses on three action areas:</p> <ul style="list-style-type: none"> • the determination of exposure to environmental noise • ensuring that information on environmental noise and its effects is made available to the public • preventing and reducing environmental noise where necessary and preserving environmental noise quality where it is good <p>The Directive requires Member States to prepare and publish, every 5 years, noise maps and noise management action plans for:</p> <ul style="list-style-type: none"> • agglomerations with more than 100,000 inhabitants • major roads (more than 3 million vehicles a year) • major railways (more than 30,000 trains a year) • major airports (more than 50,0000 movements a year, including small aircrafts and helicopters) 	<p>The IIA to incorporate an objective which considers the potential effects of the Local Plan in terms of environmental noise.</p> <p>The Local Plan should seek to minimise the adverse impacts of environmental noise for people living and working in, and visiting the area.</p> <p>The Local Plan should seek to prevent and reduce environmental noise and preserve quiet areas.</p>
<p>EU Directive on Ambient Air Quality and Management 96/62/EC</p>	<p>Merges four directives into a single directive on air quality. It sets standards and target dates for reducing concentrations of fine particles, which together with coarser particles known as PM₁₀ already subject to legislation, are among the most dangerous pollutants for human health. Under the directive Member States are</p>	<p>IIA objectives should consider the potential effects that the Local Plan will have in terms of air quality.</p>

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

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • Domestic waste water • Mixture of waste water • Waste water from certain industrial sectors <p>The Directive requires the following actions to be undertaken from all Member states:</p> <ul style="list-style-type: none"> • The Collection and treatment of waste water in all agglomerations of >2000 population equivalents • Secondary treatment of all discharges from agglomerations of >2000 p.e., and more advanced treatment for agglomerations >10,000 population equivalents in designated sensitive areas and their catchments • A requirement for pre-authorisation of all discharges of urban wastewater, or discharges from the food-processing industry and of industrial discharges into urban wastewater collection systems; • Monitoring the performance of treatment plants and receiving wasters; and • Controls of sewage sludge disposal and re-use, and treated waste water re-use whenever it is appropriate. 	
<p>Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC</p>	<p>The Promotion of the Use of Energy from Renewable Sources directive establishes an overall policy for the production and promotion of energy from renewable sources in the EU. It requires the EU to fulfil at least 20% of its total energy needs with renewables by 2020. All EU counties must also ensure that there is at least 10% of their transport fuels come from renewable sources by 2020.</p> <p>The Directive specifies national renewable energy targets for each country, taking into consideration the country's starting point and</p>	<p>IIA objectives to reflect the need to promote renewables.</p> <p>The Local Plan will need to consider a policy response to aid in the promotion of renewable energy that will ensure national and international obligations specified within this directive are met.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	overall potential for renewables. The United Kingdom has a target of at least 15% share of energy from renewable sources.	
Health for Growth 2014-2020, European Commission, 2011	<p>Health for Growth is the third EU health programme. It seeks to enable health to better contribute to economic growth and achieving the objectives of Europe 2020. The programme has the following 4 overarching objectives:</p> <ol style="list-style-type: none"> 1. Promote health, prevent diseases and foster supportive environments for healthy lifestyles taking into account the 'health in all policies' principle 2. Protect Union citizens from serious cross-border health threats 3. Contribute to innovative, efficient and sustainable health systems 4. Facilitate access to better and safer healthcare for Union citizens 	<p>IIA to assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough.</p> <p>The Local Plan to consider how its policies and proposals can support innovative solutions to improve healthcare provision.</p> <p>The Local Plan should consider public health.</p>
European Convention on the Protection of the Archaeological Heritage (revised), 1992	The aim of this Convention (also referred to as the Valletta treaty) is to protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study. The need to protect the archaeological heritage should be reflected in town and country planning and cultural development policies.	<p>IIA objectives to reflect the requirement to protect archaeological heritage.</p> <p>The Local Plan should continue to contribute to the protection of the borough's archaeological heritage.</p>
European Landscape Convention 2000	The European Landscape Convention (also known as the Florence Convention) promotes the protection, management and planning of European landscapes and organises European co-operation on landscape issues.	<p>IIA objectives to reflect the need to promote landscape protection.</p> <p>The Local Plan should consider a policy response to protecting European Landscapes.</p>
National		
Equality Act 2010	<p>Under regulation 149 of the Equality Act 2010, a public authority and those who exercise public functions, in the exercise of its function, to have due regard to the need to</p> <ul style="list-style-type: none"> • Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this act 	The IIA will fulfil the requirements of the Equality Act through the carrying out of an Equality Impact Assessment (EqIA).

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; • Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. 	<p>The Local Plan will play an important role in advancing equality of opportunity and fostering good relations.</p>
Wildlife and Countryside Act 1981	<p>The Wildlife and Countryside Act 1981 consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats and Council Directive 79/049/EEC on the conservation of wild birds in Great Britain.</p> <p>The Act makes it an offence to kill, injure or otherwise harm any wild bird, specified animals (listed in Schedule 5) and wild plants. The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9 in England and Wales.</p>	<p>The IIA should consider the potential effects the emerging Local Plan will have on the borough's wildlife.</p> <p>The IIA objectives to reflect the need to protect native wildlife.</p> <p>The Local Plan to consider how it can promote naturalisation.</p> <p>The Local Plan to consider the issues around the protection of wildlife.</p>
Flood and Water Management Act 2010	<p>The Flood and Water Management Act provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer.</p> <p>The Act contains the following key actions:</p> <ul style="list-style-type: none"> • Requirement for the Environment Agency to develop, maintain, apply and monitor a strategy for flood and coastal erosion risk management in England which a number of organisations will have to follow • Requirement for lead local flood authority for an area in England to develop, maintain, apply and monitor a strategy for local flood risk management in its area 	<p>IIA objectives to reflect the need to address flooding and water management.</p> <p>The Local Plan should consider the issues around water management within Brent and promote the use of Sustainable Urban Drainage Systems (SuDS)</p> <p>The Local Plan to be informed by a Strategic Flood Risk Assessment, and support the implementation of the flood risk management strategy.</p>

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	<ul style="list-style-type: none"> • Enables the Environment Agency and local authorities to exercise their flood or coastal erosion risk management functions with greater ease than previously • Requirement for a lead local flood authority to <ul style="list-style-type: none"> ○ establish and maintain a register of structures or features which, in the opinion of the authority, are likely to have a significant effect on a flood risk in its area; and, ○ a record of information about each of those structures or features, including information about ownership and state of repair • Introduces a more risk-based approach to reservoir management • Requirement for a sustainable drainage system (to be approved prior to construction) at certain type of development sites • Introduces a mandatory building standard for sewers 	

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The Children Act 2004	<p>The Children Act places a statutory duty on local authorities to act as the champion for all children and young people in the borough. Each local authority in England must make arrangements to co-operate with relevant partners, with the view to improving the well-being of children in the authority's area so far as relating to:</p> <ol style="list-style-type: none"> 1. Physical and mental health and emotional well-being 2. Protection for harm and neglect 3. Education, training and recreation 4. The contribution made by them to society 5. Social and economic well-being <p>The Act also places a requirement on a local authority to establish a Children's Trust Board and a Local Safeguarding Children Board for their area.</p> <p>Regulation 17 of the Act states that "<i>The Secretary of State may be regulations require a Children's Trust Board From time to time to prepare and publish a children and young people's plan</i>", which sets out the strategy of the persons or bodies represented on the Board for co-operating with each other with a view of improving the well-being of children and relevant young persons in the area.</p>	<p>IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population.</p> <p>The Local Plan to ensure that is sufficient social infrastructure to support the proposed developments and the current and future population of the borough.</p> <p>The Local Plan should seek opportunities to improve the environment in which children and young people live, learn, work and play</p>
Education Act 2011	<p>The Education Act places a statutory duty on local authorities to "<i>promote high standards and fulfilment of potential in school so that all children and young people benefits from at least a good education</i>".</p>	<p>IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population.</p> <p>The Local Plan to ensure that there is sufficient social infrastructure i.e. schools, social care and community</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
		halls, to support the growing population.
Energy Act 2013	The Energy Act establishes a legislative framework for delivering secure, affordable and low carbon energy. The Act includes provisions on decarbonisation, nuclear regulation, government pipeline and storage system, electricity market reform and consumer protection.	The Local Plan and the IIA will take account of the Energy Act where it is relevant IIA objectives to reflect the need to promote low carbon energy.
Climate Change Act 2008	The Climate Change Act sets legally binding targets to ensure that the net UK carbon account for 2050 is at least 80% lower than the 1990 baseline The Act also places a duty on the Secretary of State to <ul style="list-style-type: none"> • Set for each succeeding period of five years beginning with the period 2008-2012 an amount for the net UK carbon account, and • To ensure that the net UK carbon account for a budgetary period does not exceed the carbon budget 	IIA objectives to reflect the need to reduce carbon dioxide emissions. The IIA should consider the potential impacts of the emerging Local Plan in terms of issues around climate change. The Local Plan should consider issues around climate change.
Planning (Listed Building and Conservation Areas) Act 1990	The Planning (Listed Building and Conservation Areas) Act consolidate certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest. Regulation 66 states that <i>“In considering whether to grant planning for permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”</i> .	IIA objectives to reflect the desirability of preserving heritage. The IIA should consider the impacts proposed development/policies would have on the borough’s heritage assets. The Local Plan should consider issues around the management of the borough’s heritage assets.
Ancient Monuments and Archaeological Areas Act 1979	The Ancient Monument and Archaeological Area Act consolidates and amends the law relating to ancient monuments. It makes provision for the investigation, preservation and recording of	The IIA and Local Plan Review will take into account and accord within the provisions set out in the Ancient

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	<p>matters of archaeological or historical interest and for the regulation of operations of activities affecting such matters.</p> <p>Section 61(12) defines sites that warrant protection due to their being of national importance as 'ancient monuments'.</p> <p>The Act also introduced the concept of Areas of Archaeological Importance and city centres of historic significance which receive limited further protection by forcing developers to permit archaeological access prior to building work starting.</p>	<p>Monuments and Archaeological Areas Act.</p>
<p>UK Climate Change Programme 2006</p>	<p>The UK Climate Change Programme sets out the Government's commitments both at international and domestic levels to meet the challenge of climate change. On a domestic level the strategy stated that the following actions would be carried out:</p> <ul style="list-style-type: none"> • Report annually to Parliament on emissions, future plans and progress on domestic climate change • Set out an adaptation plan for the UK which has been informed by additional research on the impacts of climate change. <p>The strategy identified a number of primary elements which involved working with a number of sectors (energy, business, public sector and local government, transport, agriculture) to improve fuel and energy efficiency.</p>	<p>IIA objectives to reflect the need to meet the challenge of climate change and promote energy efficiency.</p> <p>The Local Plan should consider issues around climate change.</p> <p>The Local Plan should explore measures/methods on how the borough will adapt to the impacts of climate change.</p>
<p>National Planning Policy Framework, Department for Communities and Local Government, February 2019</p>	<p>The National Planning Policy Framework (NPPF) sets out the Government's requirement for the planning policies for England and how these are expected to be applied.</p> <p>As stated in Paragraph 10, "<i>At the heart of the Framework is a presumption in favour of sustainable development. "The Government believes that the planning system has three overarching objectives in order to achieve sustainable development:</i></p> <ul style="list-style-type: none"> • An economic objective – to help build a strong, responsive and competitive economy 	<p>The IIA objectives to encompass economic, social and environmental sustainability principles outlined in the NPPF</p> <p>The Local Plan must be in conformity with the NPPF and promote sustainable development.</p>

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	<ul style="list-style-type: none"> • A social objective – supporting strong, vibrant and healthy communities; and • An environmental objective – contributing to protecting and enhancing our natural, built and historic environment, including making effective use of land <p>Following on from discussing plan-making and decision-making, the NPPF set out the policies for planning in England, which are broken down into the following 17 sections.</p> <ol style="list-style-type: none"> 1. Delivering a sufficient supply of homes 2. Building a strong, competitive economy 3. Ensuring the vitality of town centres 4. Promoting healthy and safe communities 5. Promoting sustainable transport 6. Supporting high quality communications 7. Making effective use of the land 8. Achieving well-designed places 9. Protecting green belt land 10. Meeting the challenge of climate change, flooding and coastal change 11. Conserving and enhancing the natural environment 12. Conserving and enhancing the historic environment 13. Facilitating the sustainable use of minerals 14. 	
National Planning Policy for Waste, October 2014	The National Planning Policy for Waste sets out detailed waste planning policies. The document provides guidance on how local planning authorities should identify the need for waste management facilities, identify suitable sites and determine waste planning applications	<p>IIA objectives and the Local Plan should seek to promote a sustainable and efficient approach to resource use and management.</p> <p>The Local Plan should consider issues around waste management. Waste management should be considered alongside other spatial concerns.</p>

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<p>Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015</p>	<p>Planning Policy for Traveller Sites sets out the Government's planning policy for traveller sites. It states that "<i>The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community</i>".</p> <p>To help achieve the above overarching aim, the Government's aims in respect of traveller sites are:</p> <ul style="list-style-type: none"> A. That local planning authorities should make their own assessment of need for the purposes of planning B. To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites C. To encourage local planning authorities to plan for sites over a reasonable timescale D. That plan-making and decision-taking should protect Green Belt from inappropriate development E. To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites F. That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective. G. For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies H. To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply I. To reduce tensions between settled and traveller communities in plan-making and planning decisions J. To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure 	<p>IIA objectives should seek to ensure fair and equal treatment of travellers, ensuring their needs are addressed.</p> <p>The Local Plan should identify need and seek to address under provision for the travellers' community.</p>

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	K. For local planning authorities to have due regard to the protection of local amenity and local environment	
DfE strategy 2015 to 2020: world-class education and care, Department for Education, March 2016	<p>Identifies the Government’s vision, system goals, delivery priorities and principles for the UK’s education system.</p> <p>The vision is as follows: <i>“Provide world-class education and care that allows every child and young person to reach his or her potential, regardless of background”.</i></p> <p>To achieve the above vision, the strategy sets out the following twelve strategic priorities:</p> <ol style="list-style-type: none"> 1. Recruit, develop, support and retain teachers 2. Strengthen school and system leadership 3. Drive sustainable school improvement 4. Embed clear and intelligent accountability 5. Embed rigorous standards, curriculum and assessment 6. Ensure access to quality places where they are needed 7. Deliver fair and sustainable funding 8. Reform 16-19 skills 9. Develop early years’ strategy 10. Strengthen children’s social care 11. Support and protect vulnerable children 12. Build character and resilience 	<p>IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population.</p> <p>The Local Plan should ensure that there is sufficient education provision to support the existing and future population of the borough.</p>
Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment, English Heritage (now known as Historic England), April 2008	<p>Sets out the logical approach to making decision and offering guidance about all aspects of England’s historic environment.</p> <p>The document sets out the following six conservation principles which are to provide a comprehensive framework for sustainable management of the historic environment:</p> <ol style="list-style-type: none"> 1. The historic environment is a shared resource 2. Everyone should be able to participate in sustaining the historic environment 3. Understanding the significance of place is vital 	<p>IIA objectives to reflect the desirability of preserving heritage.</p> <p>The IIA should consider the impacts proposed development/policies would have on the borough’s heritage assets.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ol style="list-style-type: none"> 4. Significant [places should be managed to sustain their values 5. Decisions about charges must be reasonable, transparent and consistent 6. Documenting and learning from decisions is essential 	<p>The Local Plan should seek to protect and enhance the borough's heritage assets</p> <p>The Local Plan should consider issues around the management of the borough's heritage assets.</p>
<p>International Education Strategy: global potential, global growth, Department for Education, Department for International Trade, March 2019</p>	<p>The strategy sets out the government's objective to drive ambition across the UK education sector, and an ambition to increase education exports to £35 billion by 2030. To achieve this ambition, the strategy states a need to build our global market share in international students across all education sectors.</p> <p>To support the implementation of the strategy, 5 cross cutting actions are proposed that will support the whole education sector. These are:</p> <ul style="list-style-type: none"> • Appoint an International Education Champion • Ensure Education is GREAT promotes the breadth and diversity of the UK education offer • Continue to provide a welcoming environment for international students and develop an increasingly competitive offer • Establish a whole-of-government approach • Provide a clearer picture of exports activity 	<p>IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population.</p> <p>The Local Plan should ensure that there is sufficient education provision to support the existing and future population of the borough</p> <p>The Local Plan should seek to establish a strong commitment to high quality education which will generate economic, personal and cultural growth.</p>
<p>Clean Air Strategy 2019, Department for Environment, Food and Rural Affairs, 2019 (supersedes the 2011 Air Quality Strategy)</p>	<p>The updated Strategy sets out actions that will be required from across all parts of government and society that will help tackle all sources of air pollution. It provides a long-term vision for improving air quality in the UK and outlines actions to protect the nation's health and protect the environment through the following:</p>	<p>IIA should promote improving air quality within the borough, particularly within AQMA and Air Quality Focus areas</p>

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	<ul style="list-style-type: none"> • Securing clean growth and driving innovation • Action to reduce emissions from transport • Action to reduce emissions at home • Action to reduce emissions from farming • Action to reduce emissions from industry • Leadership at all levels. <p>The aim of the updated Strategy is: <i>“This Clean Air Strategy shows how we will tackle all sources of air pollution, making our air healthier to breathe, protecting nature and boosting the economy”.</i></p> <p>The strategy states that a new, ambitious, long-term target to reduce people’s exposure to particulate matter pollution to PM_{2.5}.</p>	<p>The IIA will consider the possible impact the emerging Local Plan will have on air quality within the borough.</p> <p>The emerging Local Plan and IIA will take account of the UK Air Quality Strategy.</p> <p>The emerging Local Plan will seek to ensure there is improvement in the air quality within the borough</p>
<p>The UK Government Sustainable Development Strategy, HM Government, 2005</p>	<p>The strategy set out the following guiding principles which will be used to achieve the sustainable development purpose and will form the basis for policy in the UK:</p> <ul style="list-style-type: none"> • Living within environmental limits • Ensuring a strong, healthy and just society • Achieving a sustainable economy • Promoting good governance • Using sound science responsibly <p>The shared priority areas for immediate action identified within the strategy are:</p> <ul style="list-style-type: none"> • Sustainable consumption and production • Climate change and energy • Natural resource protection and environmental enhancement • Sustainable communities 	<p>The Local Plan and the IIA objectives should reflect the vision and objectives of the strategy and promote sustainable development.</p>

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The UK Low Carbon Transition Plan, HM Government, July 2009	<p>Sets out the Government’s plan to deliver emission cuts of 18% on 2008 levels by 2020. Key steps include:</p> <ul style="list-style-type: none"> • getting 40% of electricity from low carbon sources by 2020 • making homes greener • helping the most vulnerable, through a community based approach to delivering green homes • promoting green industry; • tackling emissions from farming; and • cutting carbon dioxide emissions from transport 	<p>IIA objectives to reflect the need to reduce carbon dioxide emissions.</p> <p>IIA objectives to reflect the need to promote low carbon energy.</p> <p>The Local Plan should seek to reduce carbon emissions, promote the greening of houses and the use of renewable energy.</p>
The Carbon Plan, HM Government, December 2011	<p>The Plan sets out how the UK will make the transition to a low carbon economy to help cut emissions by 80% by 2050, while maintaining energy security. The Plan focuses around the topics of:</p> <ul style="list-style-type: none"> • Low Carbon Buildings – by 2050, all buildings will need to have an emissions footprint close to zero. Buildings will need to become better insulation, use more energy-efficient products and obtain their heating from low carbon sources. • Low Carbon Transport – by 2050, domestic transport will need to be substantially reduce its emissions • Low Carbon Industry - By 2050, the Government expects industry to have delivered its fair share of emissions cuts, achieving reductions of up to 70% from 2009 levels. • Low Carbon Electricity – by 2050, emissions from the power sector need to be close to zero • Agriculture, land use, forestry and waste - Government is encouraging practical actions which lead to efficiencies such as improved crop nutrient management and better breeding and feeding practices, which save both money and emissions. 	<p>IIA objectives should be reflective of the move to the low carbon future.</p> <p>The Local Plan take account of and be in line with The Carbon Plan.</p>

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<p>UK Renewable Energy Strategy, HM Government, 2009</p>	<p>The strategy sets out the path for the UK to meet legally-binding target to ensure 15% of our energy comes from renewable sources by 2020.</p> <p>The Strategy also states that it will help to “<i>tackle climate change, reducing UK’s emissions of carbon dioxide by over 750 million tonnes between now and 2030. It will also promote the security of our energy supply, reducing our overall fossil fuel demand by around 10% and gas imports by 20-30% against what they would have been in 2020</i>”.</p>	<p>Issues around renewable energy will be considered in the IIA.</p> <p>The Local Plan and the IIA will take account of, and be in line with the UK Renewable Energy Strategy.</p> <p>The Local Plan to promote the use of renewable energy to help contribute to meeting legally-binding targets.</p>
<p>Future Water: The Government’s Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011</p>	<p>Future Water sets out how the government wants the water sector to look by 2030, and identified some of the steps that need to be undertaken to get there</p> <p>The Government’s vision for water policy and management is one where, by 2030 at the latest, we have:</p> <ul style="list-style-type: none"> • Improved the quality of our water environment and the ecology which it supports, and continued to provide high levels of drinking water from our taps; • Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water; • Ensured a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges; • Embedded continuous adaptation to climate change and other pressures across the water industry and water users. <p>As part of the above vision, the Government would like to achieve the following objectives:</p> <ul style="list-style-type: none"> • Reduced per capita consumption of water through cost effective measures, to an average of 130 litres per person per day by 2030, or possibly even 120 litres per person per day • Amending the Building Regulations to include a requirement for a minimum standard of water efficiency in new homes 	<p>The IIA should consider the potential effects of the emerging Local Plan around water management.</p> <p>The IIA objectives should reflect the need for sustainable water use and the need to manage flood risk.</p> <p>The Local Plan should consider the issues around water management and flood risk within Brent and promote the use of Sustainable Urban Drainage Systems (SuDS)</p> <p>The Local Plan should seek to improve the chemical and ecological status of water bodies within Brent.</p>

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	<ul style="list-style-type: none"> • Development of a National Policy Statement for water supply and wastewater treatment infrastructure • Large majority of water bodies in England having good ecological and chemical status 	
<p>UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012</p>	<p>The purpose of the UK Biodiversity Framework is to set a broad enabling structure for action across the UK between 2011 and 2020. The Framework sets out the following vision:</p> <p><i>“By 2050, biodiversity is valued, conserved, restored and wisely used, maintain ecosystem services, sustaining a healthy planet and delivering benefits essential for all people”.</i></p> <p>The Framework is based on the following five strategic goals:</p> <ul style="list-style-type: none"> • Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society • Reduce the direct pressures on biodiversity and promote sustainable use • To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity • Enhance the benefits to all from biodiversity and ecosystems • Enhance implementation through participatory planning, knowledge management and capacity building. <p>The document identifies 23 areas of work which will contribute to the four UK countries achieving the ‘Aichi Biodiversity Targets’ and the aims of the EU biodiversity strategy.</p>	<p>IIA objective to reflect the need to value, conserve and restore ecosystem services within the borough.</p> <p>The IIA should assess the potential impacts policies and proposals contained within the emerging Plan could have on the borough’s biodiversity.</p> <p>The Local Plan should promote biological diversity and seek to avoid any detrimental impact on species and habitats.</p>
<p>Safeguarding our soils: A Strategy for England, Department for Environment Food and Rural Affairs, 2009</p>	<p>The Strategy sets out the following vision:</p> <p><i>By 2030, all England’s soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England’s soils and safeguard their ability to provide essential services for future generations.</i></p>	<p>IIA objectives to reflect the need to protect the quality of soils and safeguard their ability to provide essential services for future generations.</p>

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	<p>The Strategy introduced a number of key new actions, which includes:</p> <ul style="list-style-type: none"> • A commitment to developing a new framework for action for peat protection, including on horticultural peat use post 2010 • Reviewing thresholds for pollutants entering soil through recycling materials to land • Publishing a new code for practice for soil use on construction sites and a new toolkit for planners in 2010 on how to take account of soil functions through the planning system 	<p>The Local Plan to reflect the objectives of this strategy.</p>
<p>White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011</p>	<p>This White Paper outlines the Government’s commitment to protecting the population from serious health threats; helping people live longer healthier and more fulfilling lives; and improving the health of the poorest, fastest.</p> <p>The Paper responds to Professor Sir Michael Marmot’s <i>Fair Society, Healthy Lives</i> report and adopts its life course framework for tackling the wider social determinants of health. The approach will aim to build people’s self-esteem, confidence and resilience right from infancy – with stronger support for early years.</p> <p>The Paper identifies that the current approach is not up to the task of seizing the number of opportunities identified and sets out a new approach that will reach across and reach out – addressing the root causes of poor health and wellbeing, reaching out to the individuals and families who need the most support. The new approach will be:</p> <ul style="list-style-type: none"> • Responsive – owned by communities and shaped by their needs • Resourced - with ring-fenced funding and incentives to improve • Rigorous – professionally-led, focused on evidence, efficient and effective; and 	<p>IIA objective to reflect the need to address the cause of poor health and wellbeing.</p> <p>The IIA will assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough.</p> <p>The Local Plan to consider how its policies and proposals can support innovative solutions to improve healthcare provision.</p> <p>The Local Plan should consider public health.</p>

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	<ul style="list-style-type: none"> • Resilient – strengthening protection against current and future threats to health <p>The White Paper highlights local innovation and outlines the cross-government framework that will enable local communities to reduce inequalities and improve health at key stages in people’s lives. This includes:</p> <ul style="list-style-type: none"> • The requirement for upper-tier councils and unitary authorities to lead local hire Directors of Public Health to lead local public health efforts; • Clarifying the role of local authorities and the Director of Public Health in health improvement, health protection and population healthcare; • Identifying the mandatory services that local authorities are required to provide; and • Establishing Public Health England as an Executive Agency to provide greater operational independence within a structure that is accountable to the Secretary of State for Health. 	
<p>UK plan for tackling roadside nitrogen dioxide concentrations – an overview, Department for Environment Food and Rural Affairs, Department for Transport, July 2017</p>	<p>Recognises the leadership role that the Government has to take to help Local Authorities tackle the causes of air pollution, particularly nitrogen dioxide.</p> <p>The document sets out the following actions that the Government will take:</p> <ul style="list-style-type: none"> • Setting up a £255m Implementation Fund • Establishing a Clean Air Fund • £100 million for retrofitting and new low emission buses <p>Sets out the requirement for relevant local authorities to produce initial plans by the end of March 2018, to be followed by final plans by the end of December 2018.</p>	<p>IIA objective to reflect the need to improve air quality</p> <p>The IIA will consider the possible impact the emerging Local Plan will have on air quality within the borough.</p> <p>The Local Plan will seek to ensure there is improvement in the air quality within the borough</p> <p>The Local Plan and IIA will take into account the Government’s ambition to</p>

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	<p>The document also stated that the <i>“Government will assess local plans to ensure they are effective, fair, good value, and deliver the necessary air quality compliance”</i>.</p>	<p>reduce nitrogen dioxide concentrations.</p>
<p>Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010</p>	<p>The aim of the Policy Statement is to provide clarity regarding current policies and practices to enable noise management decisions to be made within the wider context, at the most appropriate level, in a cost-effective manner and in a timely fashion.</p> <p>The Policy Statement sets out the following long-term vision of Government noise policy: <i>“Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development”</i>.</p> <p>This long-term vision is supported by the following aims: <i>“Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:</i></p> <ul style="list-style-type: none"> • <i>Avoid significant adverse impacts on health and quality of life;</i> • <i>Mitigate and minimise adverse impacts on health and quality of life; and</i> • <i>Where possible, contribute to the improvement of health and quality of life.</i> 	<p>IIA objectives to reflect the need to mitigate and minimise adverse impacts on health from noise.</p> <p>The Local Plan to contribute to the aims of the policy statement, by taking forward relevant priorities identified in the borough Noise Action Plan.</p>
<p>Secured by Design 2019 (supersedes Secured by Design 2016)</p>	<p>Secure by Design is a police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major and minor property refurbishment, to adopt crime prevention measures.</p> <p>The 2019 edition incorporates the latest security standards, developed to address emerging criminal methods of attack, and includes references to the Building Regulations and other statutory requirements across the UK. It has been designed to cater for the</p>	<p>IIA and the Local Plan to reflect the need to reduce and/or prevent crime.</p> <p>The Local Plan should promote the Secure by Design principles</p>

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	<p>security of all new and refurbished homes, including those for older and disabled people.</p> <p>The document provides guidance on proven crime reduction methodologies for the external environment, with the requirements and recommendations within the guide being based upon sound research findings that have been proven to deliver crime reduction and cost efficiency savings..</p>	
Environmental Protection Act 1990	This Act makes provision for the improved control of pollution arising from certain industrial and other processes. It brings in a system of integrated pollution control for the disposal of waste to land, water and air. The Act gives Local Authorities new powers to control air pollution from a range of prescribed processes.	IIA and the Local Plan to be in accordance with the Environmental Protection Act
Policy statement: Planning for schools development, Department for Communities and Local Government, August 2011 (supersedes the Statement of 26 th July 2010)	<p>The Policy Statements sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>The Statement sets out the there is a presumption in favor of the development of state-funded schools, as expressed in the National Planning Policy Framework, and therefore the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of these schools.</p>	<p>IIA objectives to reflect the need to ensure that there is sufficient social infrastructure i.e. schools, social care and community halls, to support the growing population.</p> <p>The Local Plan should ensure that there is sufficient education provision to support the existing and future population of the borough.</p>
Written Ministerial Statement: Sustainable Drainage Systems, December 2014	<p>The Statement makes clear the Government's expectations that sustainable drainage systems are to be provided within new developments wherever it is appropriate.</p> <p>The Statement introduced a requirement from the 6th April 2015 for local planning policies and decision on planning applications relating to major development to ensure that sustainable drainage systems for the management of run-off are put in place, unless demonstrated to be inappropriate.</p>	<p>IIA objective to reflect the need for sustainable drainage.</p> <p>The Local Plan to promote the use of SuDS on development sites (where appropriate)</p> <p>Local Plan policy to be reflective of the requirement introduced through the ministerial statement.</p>

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<p>Housing White Paper; fixing our Broken Housing Market, Department for Communities and Local Government, February 2017</p>	<p>The housing white paper sets out the Government's strategy to build the homes the country needs. It identifies the support the Government will provide to enhance the capacity of local authorities and industry to build new homes, and the role that professions and institutions should play to make the identified proposals a reality.</p> <p>The proposals and actions identified within this White paper focus on the following areas:</p> <ul style="list-style-type: none"> • Planning for the right homes in the right places • Building homes faster • Diversifying the market • Helping people now 	<p>IIA objective to reflect the need to secure housing to meet identified need, particularly affordable housing.</p> <p>The Local Plan will directly contribute to the aspirations of the White Paper, by setting out an up to date plan which seeks to boost housing supply.</p> <p>Through site allocations, the emerging Local Plan will seek to ensure that there is an adequate supply of affordable housing being provided within the borough.</p>
Regional		
<p>The draft new London Plan, GLA, 2017 (2018 – Minor Amendments) (2019 - Intend to Publish)</p>	<p>The draft London Plan provides the framework to address key planning issues facing London. The Plan covers the following policy areas / chapters:</p> <ol style="list-style-type: none"> 1. Planning London's Future – Good Growth 2. Spatial Development Patterns 3. Design 4. Housing 5. Social Infrastructure 6. Economy 7. Heritage and Culture 8. Green Infrastructure and Natural Environment 9. Sustainable Infrastructure 10. Transport <p>Chapter 11 focuses on delivery of the plan and planning obligations, and chapter 12 focuses on monitoring of the plan.</p>	<p>IIA objectives to reflect and building upon the key policy areas identified within the new London Plan.</p> <p>The Local Plan must be in conformity with the London Plan.</p>

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	<p>Each of the above policy areas in the Plan is informed by the following six Good Growth policies:</p> <ul style="list-style-type: none"> • Policy GG1: Building strong and inclusive communities • Policy GG2: Making the best use of land • Policy GG3: Creating a healthy city • Policy GG4: Delivering the homes Londoners needs • Policy GG5: Growing a good economy • Policy GG6: Increasing efficiency and resilience <p>Chapter two sets out the overall spatial development pattern for London, and focuses on the growth strategies for specific places in London and how they connect to the wider South East.</p> <p>There are a number of Key Performance Indicators identified within the draft new Plan, which include:</p> <ul style="list-style-type: none"> • Increasing mode share for walking, cycling and public transport (excluding taxis) towards the target of 80% by 2041; • A positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average) • Average on site carbon emission reductions of at least 35% compared to Building Regulations 2013 for approved and referable development applications; and • Increase in the supply of new homes towards meeting the 66,000 net additional homes needed per year up to March 2029 	
The London Plan, GLA, 2016	<p>The London Plan sets out an integrated social, economic and environmental framework for the future development of London and deals with planning issues of strategic importance.</p> <p>The London Plan sets out the following vision</p>	<p>IIA objectives should reflect and build upon the London Plan's strategic themes and objectives.</p> <p>The Local Plan must be in conformity with the London Plan.</p>

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	<p data-bbox="595 233 1478 432"><i>“Over the years to 2036 – and beyond, London should: Excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change.”</i></p> <p data-bbox="595 472 1346 533">To achieve the over-arching vision for London, the Plan is supported by the following six objectives:</p> <ol data-bbox="645 539 1478 1378" style="list-style-type: none"> <li data-bbox="645 539 1478 735">1. A city that meets the challenges of economic and population in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes; and <li data-bbox="645 742 1478 970">2. An internationally competitive and successful city with a strong and diverse with a strong and diverse economy and an entrepreneurial spirit that benefit all Londoners and all parts of London; a city that is at the leading edge of innovation and research, and which is comfortable with – and makes the most of – its rich heritage and cultural resources. <li data-bbox="645 976 1478 1204">3. A city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive. <li data-bbox="645 1211 1478 1378">4. A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London’s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways, 	

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	<p>realising their potential for improving Londoners' health, welfare and development.</p> <p>5. A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.</p> <p>6. A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling, makes better use of the Thames and supports delivery of all the objectives of this Plan</p> <p>The Policies of the London Plan are split into the following chapters:</p> <ul style="list-style-type: none"> • Context and Strategy • London's Places • London's People • London's Economy • London's Response to Climate Change • London's Transport • London's Living Spaces and Places • Implementation, Monitoring and Review 	
<p>A City for All Londoners, GLA, October 2016</p>	<p>The document sets the tone for the strategies and the direction of travel for the current Mayor's Mayoralty.</p> <p>The Mayor's key policy areas are as follows:</p> <ol style="list-style-type: none"> 1. Accommodating growth – intensify housing development whilst protecting employment land, intensifying development around town centres. 2. Housing – promote delivery on public sector land, and secure a variety of affordable housing types. 	<p>The IIA and Local Plan should take account of this proposed direction of travel and build on these strategic priorities.</p>

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	<ol style="list-style-type: none"> 3. Economy – continue to promote London as the top business city. 4. Environment, transport and public spaces – improve air quality and for London to be zero carbon by 2050. 5. A city for all Londoner’s – addressing inequalities, tackling disadvantage and discrimination. 	
Mayor’s Transport Strategy, GLA, 2018	The Mayor’s Transport Strategy, which was adopted in 2018, supports the healthy streets approach which seeks to create streets and street networks that encourage walking, cycling and public transport use. It also seeks to reduce the number of vehicles on London’s street through creating a good public transport experience and plans for growth, both housing and economic, around the transport network.	IIA objectives should reflect the priorities of the Transport Strategy and translate them, as appropriate to local level.
Culture and the night-time economy SPG, GLA, November 2017	<p>The SPG provides guidance on how to promote the evening and cultural economy through:</p> <ul style="list-style-type: none"> • Protecting public houses • Sustaining existing venues and providing new facilities • Promoting a wider range of evening and night time activities • Transport • Safety and Security • Environmental Services • Designing developments that provide access to all • Agents of change i.e. development should not unduly add to the cost and burdens of existing businesses# • Central Activities Zones • Promote strategic cultural areas and cultural quarters 	<p>IIA objectives should seek to protect and promote the borough’s cultural offer and evening economy.</p> <p>The Local Plan should consider if new cultural quarters could be identified.</p> <p>The emerging Local Plan should seek to protect and enhance the borough’s evening and cultural economy.</p>
Homes for Londoners – Affordable Housing and Viability SPG, GLA, August 2017	<p>The SPG’s main aim is to increase the number of affordable homes delivered through the planning system and will provide a consistent approach across London.</p> <p>The SPG sets out the Mayor’s preferred approach to implement London Plan Policies 3.11, 3.12 and 3.13.</p>	<p>IIA objectives should seek to increase affordability output.</p> <p>The Local Plan should use this SPG as a key reference in defining Local</p>

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	<p>The SPG also sets out the ‘threshold approach’ to viability, which is where the approach to viability information differs depending on the level of affordable housing being provided. The threshold hold approach consists of the following:</p> <ul style="list-style-type: none"> • Fast Track Route - applications that meet or exceed 35% affordable housing provision without public subsidy and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant, are not required to submit viability information. • Viability Tested Route – schemes which do not meet the 35% affordable housing threshold, or require public subsidy to do so will be required to submit detailed viability information which will be scrutinised by the Local Planning Authority, and where relevant the Mayor, and treated transparently. <p>The SPG also provides specific guidance on Build to Rent developments.</p>	<p>Plan affordable housing policy/principles and mix.</p> <p>Through site allocations, the Local Plan will seek to ensure that is an adequate supply of affordable housing being provided within the borough.</p>
<p>London 2036: An Agenda for Jobs and Growth, LEP & London First, 2015</p>	<p>The report aims to identify the agenda on which London’s stakeholders should focus in order to maximise job creation and economic growth to 2036.</p> <p>The report states that the agenda is designed to deliver a London economy with:</p> <ul style="list-style-type: none"> • Job growth that translates into opportunity • Diversity and resilience • Documents identifies priorities for actions. <p>It lists a number of priority actions which would help to achieve the agenda identified above. These actions identified within the document fall under the following themes:</p> <ul style="list-style-type: none"> • Cementing existing leadership: The Global Hub • Fuelling more diverse growth: The Creative Engine • Addressing weaknesses: The City that Works 	<p>The IIA should assess the impact that the policies/proposals within the Local Plan will have on Brent’s economy</p> <p>The Local Plan should seek to maximise job creation and economic growth</p>

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<p>The Mayor's draft Economic Development Strategy for London, GLA, December 2017</p>	<p>The strategy sets out the Mayor's vision to create a fairer, more inclusive economy, that works for all Londoners. It also sets out the following ambitions for London's economy in 2041:</p> <ol style="list-style-type: none"> 1. Londoners are living healthier and happier lives 2. Living standards are improving with real incomes growing year-on-year 3. London has a fairer and more inclusive economy 4. London is a more affordable city to live and work 5. Londoners who want to work and are able to, have access to quality employment and training opportunities 6. London has the most skilled and talented workforce in the world 7. London is a global leader in innovation and creativity 8. London remains the world capital for business, trade and investment 9. London is the best city in which to start and grow a business 10. More people are walking, cycling and using public transport to travel, helping London to grow sustainably 11. London is cleaner, greener, and ready for the future 12. London plays a leading role in the global transition to a low carbon circular economy 13. London has higher productivity relative to other global cities 14. London continues to contribute to the UK economy so that London and the UK grow together. <p>The Strategy outlines a number of actions which the mayor will undertake to achieve his vision.</p>	<p>The IIA should assess the impact that the policies/proposals within the Local Plan will have on Brent's economy</p> <p>The IIA objectives should reflect the objectives of the Mayor's draft Economic Strategy.</p> <p>The emerging Local Plan should ensure that the economic growth is catered for in Brent.</p>
<p>Assessing Future Potential Demand for Older Persons Housing, Care Homes and Dementia Housing in London, Three Dragons (on</p>	<p>This document provides an overview of the current housing situation for older person housing, care homes and dementia housing. It also identified the potential demand for this type of housing in the within the city.</p>	<p>IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population.</p>

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behalf of GLA), November 2017	Figure 3.3 of the report identified an annual benchmark for Brent for specialist order persons housing between 2017 to 2029 is 230 dwellings per annum.	The Local Plan to ensure that sufficient housing is supplied to meet the identified needs.
The 2017 London Strategic Housing Market Assessment (Part of the London Plan Evidence Base), GLA, November 2017	<p>This document sets out estimates of London's current and future housing requirements. This information will inform the development of the Mayor's London Plan and London Housing Strategy.</p> <p>The document estimates the need for homes within London by tenure and type, as well as analysing the housing requirements of important sub-groups of the population.</p>	<p>IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population.</p> <p>The Local Plan to ensure that sufficient housing is supplied to meet the identified needs</p>
The 2017 London Strategic Housing Land Availability Assessment (SHLAA) (Part of the London Plan Evidence Base), GLA, November 2017	<p>The document shows that London has a capacity for 649,350 homes during the ten-year period covered by the London Plan housing targets (from 201/20-2028/29). This equates to an average annualised capacity of 64,935 homes a year.</p> <p>Table 1.1 of the SHLAA sets out the total 10-year capacity for each London borough. In regards to Brent, the SHLAA states that the Brent ha a total capacity of 29,150, which equates to an annual target of 2,915.</p> <p>Table 1.2 of the SHLAA sets out the housing capacity on small sites during the ten-year period 2019/20-2028-29. In regards to Brent, the 10 year small sites target is 10,230, which equates to an annual small sites capacity of 1023.</p>	<p>IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population.</p> <p>The Local Plan to ensure that sufficient housing is supplied to meet the identified needs.</p> <p>The Local Plan to take into consideration the housing targets set out in the SHLAA.</p>
Student Population Projections and Accommodation Need for new London Plan 2017, GLA	<p>This paper presents the projections and estimations for the amount for the student population within London. It explains the rational for estimating how many of these students need to be accommodated in purpose-built student accommodation.</p> <p>The paper found that the is a net need for approximately 88,500 additional purpose-build student accommodation bed spaces between 2016 and 2041, or 3,500 when annualised over a 25-year period.</p>	<p>IIA objectives to reflect the need to provide sufficient housing which meets the identified need of the population</p> <p>The emerging Local Plan to take into consideration the findings of this paper.</p>

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<p>Housing SPG, GLA, updated August 2017</p>	<p>The SPG provides guidance on the implementation of housing policies in the 2015 London Plan and the 2016 Minor Alterations to the Plan MALP).</p> <p>The SPG is divided into 7 parts, which cover the following subjects:</p> <ul style="list-style-type: none"> • Part 1 – Housing Supply – provides guidance on achieving and exceeding minimum housing targets and advises on potential sources of additional housing capacity • Part 2 – Housing Quality – updates the London housing standards to reflect the implementation of the Government’s new national technical standards • Part 3 – Housing Choice – provides guidance on undertaking sub-regional and local housing need assessments. The information on Build to Rent developments within this part has been superseded by the 2017 Affordable Housing SPG • Part 4 – Viability Appraisals - the information within this part has been superseded by the 2017 Affordable Housing SPG • Part 5 – Investment and existing Housing Stock – provides advice on bringing empty homes back into use and the net loss of housing through redevelopment. • Part 6 – Social Infrastructure – focuses on the enabling role of housing in facilitating new infrastructure provision through mixed use development. • Part 7 – Mixed Use and Large Developments - provides guidance on residential and mixed use development in town centres, opportunity areas, large sites and housing zones. 	<p>IIA objectives should seek to increase affordability and family housing output, and reflect emphasis on quality of design and housing mix.</p> <p>The Local Plan should use this SPG as a key reference in creating policy for housing i.e. housing quality, housing conversions, housing stock</p> <p>The Local Plan should seek to provide enough dwellings to meet the borough’s objectively assessed need.</p> <p>The Local Plan should seek to ensure that there is sufficient social infrastructure to support the increase in the number of dwellings.</p>
<p>Social Infrastructure SPG, GLA, May 2015</p>	<p>The SPG contains guidance on the implementation of London Plan Policies 3.16, 3.17, 3.18 and 3.19. The SPG has a particular focus on those elements of social infrastructure that face the biggest strategic challenges – specifically health, education, sport faith and burials.</p>	<p>IIA objectives should seek to ensure the Local Plan meets the need for social infrastructure.</p> <p>The Local Plan should set out how the social infrastructure needs of the</p>

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	The SPG also includes a methodology to identify future needs and requirements and delivery mechanism.	current and future population of the borough will be met.
London Infrastructure Plan 2050 update, March 2015	<p>The London Infrastructure Plan 2050 provides an overview of London's infrastructure requirements and sets out a programme of infrastructure delivery that is believed to be necessary for London's future.</p> <p>The Plan identifies the city's infrastructure need around the following themes: transport, green infrastructure, digital connectivity, energy, a circular economy, and water, housing and social infrastructure.</p>	<p>IIA objectives should reflect the need to secure infrastructure to support growth. This will be integral to many objectives contained within the IIA.</p> <p>The Local Plan to take into account the London Infrastructure Plan 2050 when identifying the borough's infrastructure needs for the next 20 years.</p>
Accessible London; Achieving an Inclusive Environment, GLA, October 2014	<p>The SPG provides guidance on implementing inclusive design principles effectively and on creating an accessible environment in London, with particular emphasis on the access requirements of disabled and older people.</p> <p>Provides detailed guidance on implementing inclusive design principles and creating an accessible environment.</p>	<p>IIA objectives should reflect the need to promote inclusivity and access for all.</p> <p>The Local Plan should contain policies which encourages inclusive design.</p>
Town Centres SPG, GLA, July 2014	<p>The SPG contains guidance on the Implementation of London Plan Policy 2.15 and Policy 2.16. The SPG acknowledges that town centres will face many challenges, but states that "<i>Planning has a key role to play in promoting vibrant and viable centres and helping them to be flexible, resilient and adaptable to change.</i>"</p> <p>To assist in promoting successful and vibrant town centres, the SPG advances the following principles:</p> <ul style="list-style-type: none"> • Supporting the evolution and diversification of town centres • Delivering mixed use housing intensification • Quality matters • Promoting accessibility and connectivity • Town centre and regeneration initiatives • Proactive town centre strategies 	<p>IIA objectives should reflect the Mayors guidance on Town centres.</p> <p>The Local Plan should consider guidance on Town centres in connection with London Plan policy 2.15.</p> <p>The Local Plan should seek to protect and enhance the viability of the borough's town centres.</p>

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<p>Sustainable Design & Construction SPG, GLA, April 2014</p>	<p>The SPG is intended to:</p> <ul style="list-style-type: none"> • Provide detail on how to implement the sustainable design and construction and wider environmental sustainability policies in the London Plan • Provide guidance on how to develop more detailed local policies on sustainable design and construction • Provide best practice guidance on how to meet sustainability targets set out in the London Plan; and • Provide examples of how to implement sustainability measures within developments <p>The SPG includes guidance on the following subjects: energy efficient design; meeting the carbon dioxide reduction targets; decentralised energy; how to off-set carbon dioxide where the targets set out in the London Plan are not met; retro-fitting measures; support for monitoring energy use during occupation; an introduction to resilience and demand side response; air quality neutral; resilience to flooding; urban greening; pollution control; basement developments and local food growing.</p>	<p>IIA objectives should seek to promote sustainable design and construction.</p> <p>The Local Plan should incorporate the principles set out the Sustainable Design and Construction SPG.</p>
<p>Healthy Streets for London – Prioritising walking, cycling and public transport to create a healthy city, GLA, February 2017</p>	<p>The Healthy Streets Approach is a system of policies and strategies to help Londoners use cars less and walk, cycle and use public transport more. The aim of the Healthy Streets Approach is to help create a vibrant, successful city where people can live active, healthy lives.</p> <p>The deliver the Healthy Streets Approach changes are required at the following levels of policy making and delivery:</p> <ol style="list-style-type: none"> 1. Street Level 2. Network level: planning and managing London’s transport networks 3. Strategic level: policy and planning <p>The Healthy Streets Approach uses 10 evidence-based indicators, which when achieved will help to create a healthier city in which all people are included and can live well, and where inequalities are reduced.</p>	<p>The IIA will consider the impact that policies/proposals will have with regard to sustainable transport</p> <p>IIA objectives to reflect the need to promote sustainable modes of transport.</p> <p>The Local Plan will include policies which promote sustainable modes of transport.</p>

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<p>Culture for all Londoners – the Mayor of London’s Culture Strategy, GLA, December 2018</p>	<p>Culture for all Londoners: The Mayor of London’s Culture Strategy outlines an ambitious programme to sustain a city that works hard, and plays hard, for everyone – a city that is built on the principle of culture for all Londoners. The strategy outlines four priorities:</p> <ul style="list-style-type: none"> • Love London – more people experiencing and creating culture on their doorstep • Culture and Good Growth – supporting, saving and sustaining cultural places and spaces • Creative Londoners – investing in a diverse creative workforce for the future • World City – a global creative powerhouse today and in the future <p>The strategy outlines how the Mayor’s vision will be achieved through a number of policies and actions.</p>	<p>IIA objectives to reflect the need to promote access to culture, and protect cultural facilities.</p> <p>The Local Plan should contain policies which promotes the arts, culture and creative industries.</p> <p>The Local Plan should seek to protect and enhance the borough’s cultural facilities.</p>
<p>The Control of Dust and Emissions during Construction and Demolition SPG, GLA, July 2014</p>	<p>This SPG:</p> <ul style="list-style-type: none"> • Provides more detailed guidance on the implementation of all relevant policies in the London Plan and the Mayor’s Air Quality Strategy to neighborhoods, boroughs, developers, architects, consultants and any other parties involved in any aspect of the demolition and construction process; • Sets out the methodology for assessing the air quality impacts of construction and demolition in London; and • Identifies good practice for mitigating and managing air quality impacts that is relevant and achievable, with the overarching aim of protecting public health and the environment. <p>The SPG contains guidance on the following areas:</p>	<p>IIA objectives to reflect the need to improve air quality, with a focus on what is emitted during the construction phase of a development.</p> <p>The Local Plan should include policies which promote sustainable construction methods, which limit dust and emissions.</p>

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	<ul style="list-style-type: none"> • Preparation of an Air Quality Statement for construction and demolition activities, including air quality (dust) risk assessments • The stages of development the Air Quality Statement is to cover: demolition, earthwork, construction and 'trackout' (vehicles leaving the site) • Identifying the potential scale (large, medium, small) of dust emissions for each stage of work • Identifying the level of risk due to the scale of dust emissions on health, 'soiling' (dirt) and the natural environment • Best practice methods for controlling dust on-site and to prevent 'trackout' • Recommendations for monitoring • Early notification of new 2015 and 2020 standards for non-road mobile machinery 	
<p>Land for Industry and Transport SPG, GLA, September 2012</p>	<p>This SPG provides guidance on the implementation of London Plan (2011) Policies 2.1, 4.4 and 6.2. The guidance provided within this SPG is to:</p> <ul style="list-style-type: none"> • Ensure an adequate stock of industrial capacity to meet the future needs and functional requirements of different types of industrial and related uses in different parts of London, including that for good quality and affordable space; • Plan, monitor and manage the release of surplus industrial land so that it can better contribute to strategic and local planning objectives, especially those to provide more housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal; • Ensure the provision of sufficient land, suitably located, for the development of an expanded transport system to serve London's need. 	<p>IIA objectives should consider the need for employment and industrial uses in Brent.</p> <p>The Local Plan should use this SPG as a key referencing point when addressing issues around industrial capacity.</p> <p>The Local Plan should seek to protect and enhance employment and industrial land within the borough to ensure employment needs are met.</p> <p>The Local Plan will need to address issues (i.e. contamination) raised</p>

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<p>London Office Policy Review, GLA, 2017</p>	<p>This review builds on the evidence base of the London Office Policy Review 2012. It states that the London office market has changed significantly since the previous 2012 review, and considers a range of new factors, ranging from Brexit to new forms of occupation.</p> <p>Key points of note from this review include:</p> <ul style="list-style-type: none"> • Since the referendum, there has been a great deal of uncertainty over the nature of the UK's withdrawal from the EU, with the long-term outlook for London's office market resting largely on the terms under which the UK leave the EU • The role of the office is evolving into one for enabling workers to interact and collaborate – as such, London must continue to plan new capacity but the London Plan will need flexibility to respond to the shifting profile of demand (e.g. agile working) • Smaller occupiers are a critical component of demand for office space, and their numbers suggest that they will have growing impact on the medium to long term profile of demand for office space • Office to residential conversions: the impact of this has not been uniform. While it may have helped clear poor quality office stock, once employment land is lost, it virtually never returns to its employment use – it is, to all practical purposes, a permanent loss of capacity. • 	<p>around bringing industrial land into use for other purposes.</p> <p>IIA objectives should consider these findings of the London Office Policy Review.</p> <p>The Local Plan should consider these findings and the implications it may have in identifying priority uses for sites within the borough.</p>
<p>Play and Informal Recreation SPG, GLA, September 2012</p>	<p>This SPG provides guidance on the implementation of London Plan policy 3.6 but also a range of policies on shaping neighbourhoods. The guidance is directed at local authority planners, developers, community groups and a range of consultation who all have roles in ensuring the implementation of the objectives set out in the Guidance.</p>	<p>IIA objectives should seek to protect and increase play and informal recreation opportunities within the borough.</p>

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	<p>The SPG provides benchmark standards that are flexible enough to meet the varying needs of children and young people across London and should be used as a reference to guide boroughs in the development of their own local standards.</p> <p>The guidance sets out the responsibility for local authorities which is:</p> <ul style="list-style-type: none"> • To ensure robust play strategies and establishing the overall context for implementation of the Supplementary Planning Guidance; and • Having a detailed role in determining requirements for specific sites. <p>The SPG also provides guidance for neighbourhood forums and local communities in shaping their neighbourhood plans.</p>	<p>The Local Plan should seek to ensure there is sufficient supply of play and informal recreation spaces to support the current, and future, population of the borough.</p> <p>The Local Plan should seek to create a framework in which robust play strategies can be established.</p>
<p>All London Green Grid, GLA, March 2012</p> <p>All London Green Grid SPG, March 2012</p> <p>ALGG Area Frameworks</p>	<p>The All London Green Grid (ALGG) is a policy framework to promote the design and delivery of 'green infrastructure' across London. The policy framework comprises London Plan policies on green infrastructure and urban greening – and those relating to open spaces, biodiversity, trees and woodland, and river corridors, plus the All London Green Grid Supplementary Planning Guidance and 11 ALGG Area Frameworks</p> <p>The vision for the ALGG is:</p> <p><i>To create a well-designed green infrastructure network of interlinked, multi-purpose open and green spaces with good connections to the places where people live and work, public transport, the Green Belt and the Blue Ribbon Network, especially the Thames. This will provide a richly varied landscape that will benefit both people and wildlife providing diverse uses to appeal to, and be accessible by, all.</i></p>	<p>IIA objectives should reflect the need to promote green infrastructure within the borough.</p> <p>The Local Plan should contain policies which seeks to improve and enhance the borough's green infrastructure.</p> <p>The Local Plan should contain policies encouraging urban greening.</p> <p>The Local Plan policies should seek to protect the established strategically important view corridors.</p> <p>Where appropriate, the Local Plan should include references to the objectives and/or schemes identified</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<p>The aims of the ALGG are as follows:</p> <ul style="list-style-type: none"> • To protect and enhance London’s strategic network of green and open natural and cultural spaces, to connect the everyday life of the city to a range of experiences and landscapes, town centres, public transport nodes, the countryside in the urban fringe, the Thames and major employment and residential areas • To encourage greater use of, and engagement with, London’s green infrastructure; popularising key destinations within the network and fostering a greater appreciation of London’s natural and cultural landscapes; enhancing visitor facilities and extending and upgrading the walking and cycling networks in between to promote a sense of place and ownership for all who work in, visit and live in London • To secure a network of high quality, well designed and multi-functional green open spaces to establish a crucial component of urban infrastructure able to address the environmental challenges of the 21st century – most notably climate change <p>The ALGG SPG is a key document for delivering improvements to the green infrastructure network and to facilitate the identification and delivery of programmes and projects promoted by the borough and their partners. The SPG :</p> <ul style="list-style-type: none"> • Provides guidance on the implementation of all relevant policies in the London Plan to local neighbourhoods, boroughs, developers and other delivery partners; • Sets out a vision and spatial framework for London-wide green infrastructure; • Promotes partnership working across the 11 Green Grid Areas within London and beyond via Green Arc Partnerships • Identifies strategic green infrastructure opportunities 	<p>within the Brent Valley and Barnet Plateau draft SPG.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<p>The 11 Area Framework documents expand on the strategic opportunities set out in the ALGG Supplementary Planning Guidance. The Area Frameworks identify projects that would deliver London's network of green infrastructure by:</p> <ul style="list-style-type: none"> • Establishing a comprehensive baseline understanding of each area • Defining a vision, area objectives and strategic opportunities for each area • Identifying the specific projects that can improve and enhance green infrastructure in the area • Encouraging partnership working and a more joined up approach to allocating resources 	
<p>London View Management Framework, GLA, March 2012</p>	<p>Policies 7.11 and 7.12 of the London Plan establish the London View Management Framework, which seeks to designate, protect and manage 27 views of London and some of its major landmarks.</p> <p>The London View Management Framework SPG provides guidance on the policies in the London Plan for the protection of strategically important views in London.</p> <p>The SPG also contains management plans for each of the 27 views designation in the London Plan. The Management Plans contain Visual Management Guidance to draw attention to the general principles for management development in the foreground, middle ground and background of the view and for managing the view location.</p>	<p>IIA objectives should reflect the importance of protecting the setting of important buildings.</p> <p>The Local Plan policies should seek to protect the established strategically important view corridors.</p>
<p>Green Infrastructure and Open Environments: Preparing Borough Tree and Woodland Strategies, GLA, February 2013</p>	<p>This SPG was prepared jointly with the Forestry Commission, and provides guidance on the implementation of the London plan Policy 7.21 to protect, maintain and enhance trees and woodland in London.</p> <p>The SPG has been produced to provide to assist local authorities in the task of producing their own comprehensive tree and woodland strategy, so that any strategy maximises the benefits trees and</p>	<p>IIA objectives should reflect the need to promote green infrastructure within the borough.</p> <p>The Local Plan should contain policies which seeks to improve and enhance the borough's green infrastructure.</p>

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	<p>woodlands can bring to the residents and businesses of an area. A consistent approach to producing strategies will also enable the co-ordination of work managing the resource cross borough boundaries to bring cumulative benefits such as tackling climate change impacts.</p>	<p>The Local Plan should contain policies that seek to protect trees, groups of trees or woodlands within the borough that provide amenity.</p>
<p>Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaption Strategy, GLA, October 2011</p>	<p>The Mayor's climate change adaptation strategy is one of eight environmental strategies setting out the action the Mayor is taking, and encouraging others to take, to green London, retrofit London, and provide cleaner air for London. This strategy focused on how London will adapt to the climate change and its association issues.</p> <p>The aim of the London Climate Change Adaptation Strategy is to assess the consequences of climate change on London and to prepare for the impacts of climate change and extreme weather to protect and enhance the quality of life of Londoners.</p> <p>The aim will be met through achieving the following objectives:</p> <ol style="list-style-type: none"> 1. Identifying and prioritise the climate risks and opportunities facing London and understand how these will change through the century 2. Identify and prioritise the key actions required to prepare London, and to define where responsibility for delivering and facilitating these actions lies 3. Promote and facilitate new development and infrastructure that is located, designed and constructed for the climate it will experience over its design life 4. Improve the resilience of London's existing development and infrastructure to the impacts of climate change 5. Ensure that tried and tested emergency management plans exist for the key risks and that they are regularly reviewed and tested 6. Encourage and help business, public sector organisations and other institutions prepare for the challenges and opportunities presented by climate change 	<p>IIA objectives to reflect the need to meet the challenge of climate change and promote energy efficiency.</p> <p>The Local Plan should take into account the Mayor's Climate Change Adaption Strategy.</p> <p>The Local Plan should consider issues around climate change.</p> <p>The Local Plan should explore measures/methods on how the borough will adapt to the impacts of climate change.</p>

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	<p>7. Promote and facilitate the adaptation of the natural environment</p> <p>8. Raise general awareness and understanding of climate change with Londoners and improve their capacity to respond to changing climate risks</p> <p>9. Position London as an international leader in tackling climate change</p> <p>The strategy is the first step in determining the 'adaptation gap' for each climate impact in London and exploring the adaptation options to close the gap. The Mayor will work with partners to identify the risk management options, assess the 'true' value of these options and then develop flexible adaptations pathways for each climate risk.</p>	
	<ul style="list-style-type: none"> • 	
<p>London Environment Strategy, GLA, May 2018</p>	<p>The London Environment Strategy sets out the Mayor's aspiration to help turn London into a zero carbon city by 2050, and is an integrated environment strategy for London that combines policy and action. The strategy sets out the following environmental challenges: Air quality, green space, biodiversity, greenhouse gas emissions, energy use, waste, flood risk, heat risk, water scarcity, river water quality and ambient noise.</p> <p>The Mayor outlines four strategic approaches to master the most of environmental opportunities now and in the future. These are:</p> <ul style="list-style-type: none"> • Low carbon circular economy • Smart digital city • Green infrastructure and natural capital accounting • The Healthy Streets Approach <p>The strategy sets out the following aims:</p> <ul style="list-style-type: none"> • London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities 	<p>IIA objectives to reflect the need to meet the challenge of climate change and promote energy efficiency, with the aim of reaching zero carbon by 2050</p> <p>The IIA objectives should reflect the objectives of the Mayor's Environment Strategy</p> <p>IIA objectives to reflect the need to reduce carbon emissions and waste</p> <p>The Local Plan should consider issues around climate change</p> <p>The Local Plan should explore measures/methods on how the borough will mitigate against the</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • London will be the world's first National Park City where more than half of its area is green; where natural environment is protected and the network of green infrastructure is managed to benefit Londoners • London will be zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy London will be a zero waste city. By 2026, no biodegradable or recyclable waste will be sent to landfill, and by 2030 65% of London's municipal waste will be recycled • London and Londoners will be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought • Londoners' quality of life will be improved by reducing the number of people adversely affected by noise and promoting more quiet and tranquil spaces • A number of objectives, policies and proposals in relation to enabling the transition to a low carbon circular economy 	<p>impacts of climate change and encourage a low carbon circular economy, a smart digital city, green infrastructure and the healthy streets approach</p>
<p>London's Waste Resource: The Mayor's Municipal Waste Management Strategy, GLA, November 2011</p>	<p>The strategy sets out what action London's households and businesses can take to reduce waste and also calls on the government and industry to play a role. The strategy identifies the following objectives:</p> <ol style="list-style-type: none"> 1. Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible 2. Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste 3. Unlock the massive economic value of London's municipal waste within London's boundary, through investment in new waste infrastructure 	<p>The IIA should consider the issues around waste and recycling and the possibility of utilising waste as a means of power generation.</p> <p>The IIA objectives should reflect the objective contained within the Mayor's Waste Strategy</p> <p>The Local Plan should consider issues around waste management. Waste management should be considered alongside other spatial concerns.</p> <p>The Local Plan should consider issues around waste and the possibility of</p>

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	<p>4. Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure</p> <p>The Mayor's key targets for the management of London's municipal waste are as follows:</p> <ol style="list-style-type: none"> 1. To achieve zero municipal waste direct to landfill by 2025 2. To reduce the amount of household waste produced from 970kg per household in 2009/10 to 790kg per household by 2031. This is equivalent to a 20% reduction per household 3. To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 20,000 tonnes a year in 2015 and 30,000 tonnes a year in 2031. 4. To recycle or compost at least 45% of municipal waste by 2015, 50% by 2020 and 60% per 2031 5. To cut Londoner's greenhouse gas emissions through the management of London's municipal waste, achieving annual greenhouse gas emissions savings of approximately: <ul style="list-style-type: none"> o 545,000 tonnes of CO₂ eq in 2015 o 770,000 tonnes of CO₂ eq in 2020 o One million tonnes of CO₂eq in 2031 6. To generate as much energy as practicable from London's organic and non-recycled waste in a way that is no more polluting in carbon terms than the energy source it is replacing. This is estimated to be possible for about 40% of London's municipal waste after recycling or composting targets are achieved by 2031. <p>To achieve the above objectives and targets, the strategy focuses on six policy areas, each of which contains a number of proposals. The 6 policy areas are:</p> <ol style="list-style-type: none"> 1. Informing producers and consumers of the value of reducing, reusing and recycling municipal waste 	<p>utilising waste as a means of power generation.</p> <p>The Local Plan should contain policies that contribute to achieving the waste targets set out in the London Plan.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ol style="list-style-type: none"> 2. Reducing climate change impact of London's municipal waste management 3. Capturing the economic benefits of municipal waste management 4. Achieving high recycling and composting rates resulting in the greatest environmental and financial benefits 5. Stimulating the development of new municipal waste management infrastructure, particularly low carbon technologies 6. Achieving a high level of street cleanliness 	
<p>Securing London's Water Future, GLA, October 2011</p>	<p>The Mayor's Water Strategy is the first water strategy for London and provides a complete picture of London's water needs. The strategy calls for organisations involved in the city's water management to:</p> <ul style="list-style-type: none"> • Invest in a water management and sewerage infrastructure system that's fit for a world class city and will create jobs • Support and encourage Londoners to take practical actions to save water, save energy and save money off their utility bills • Realise the potential of London's sewerage as an energy resource to help reduce greenhouse gas emissions • Work in partnership with the Mayor, boroughs and communities to seek and develop opportunities to manage flood risk through enhancing London's green spaces <p>The Mayor's water strategy sets out the following objectives:</p> <ol style="list-style-type: none"> 1. To use the water London already has more efficiently and effectively 2. To minimise the release of untreated wastewater and diffuse pollution into the water environment 3. To manage, and where possible reduce, the threat of flooding to people and their property 4. To reduce the greenhouse gas emissions produced from supplying water and treating wastewater. 	<p>IIA objectives to reflect the need to improve water quality.</p> <p>The IIA objectives should reflect the objectives identified within the Mayor's Water Strategy.</p> <p>IIA objectives to reflect the need to address flooding and water management.</p> <p>The Local Plan should consider issues around the protection of water quality and SuDS.</p> <p>The Local Plan should consider the issues around water management within Brent and promote the use of Sustainable Urban Drainage Systems (SuDS)</p>

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<p>Clearing the air: The Mayor's Air Quality Strategy, GLA, December 2010</p>	<p>The Air Quality Strategy sets out how the Mayor will achieve his vision for air quality in London. It details the actions that the Mayor will take to reduce air pollution in the capital using the powers available to him and sets a framework for boroughs to take action. The overarching aim of the Strategy is to reduce air pollution in London so that the health of London is improved.</p> <p>The Mayor's vision for air quality is as follows:</p> <p><i>To protect the health of Londoners and enhance their quality of life by significantly improving the quality of the air we breathe in London. This will:</i></p> <ul style="list-style-type: none"> • <i>Make London a more pleasant place to live and work in</i> • <i>Reduce the burden on health services in the capital</i> • <i>Enhance London's reputation as a green city – making it more attractive to tourists and businesses</i> • <i>Make Londoner cleaner whilst safeguarding its biodiversity</i> <p>The first priority of the strategy is to achieve Greater London EU limit values for local air pollutants, PM₁₀ and NO₂. This will be achieved through undertaking the following measures:</p> <ul style="list-style-type: none"> • Reducing emissions from transport by <ul style="list-style-type: none"> ○ Encouraging smarter choices and sustainable travel behaviour ○ Promoting technological change and cleaner vehicles ○ Reducing emissions from the public transport and public transport fleets ○ Using emissions control schemes to reduce emissions from private vehicles • Targeting air quality priority locations by: <ul style="list-style-type: none"> ○ Adopting local measures, including trialling new processes (such as the use of dust suppressants) 	<p>The IIA will consider the impact that the proposed policy/developments within the emerging Local Plan will have on air quality in the borough.</p> <p>IIA objectives to reflect the need to improve air quality.</p> <p>The IIA objectives should reflect the objectives identified in the Mayor's Air Quality Strategy.</p> <p>The Local Plan and IIA will take account of the Mayor's Air Strategy.</p> <p>Where appropriate, the Local Plan should include policies which promote measures that improve air quality.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> ○ Using action days to encourage behaviour change and reduce pollution in priority areas ● Reducing emissions from homes, business and industry by: <ul style="list-style-type: none"> ○ Promoting and delivering energy efficiency schemes ○ Using the planning system to reduce emissions from new developments ○ Updating and implementing best practice on construction and demolition ● Increasing awareness of air quality issues by: <ul style="list-style-type: none"> ○ Improving access to information about the health impacts of poor air quality ○ Directing information about poor air quality to those most at risk 	
<p>The London Health Inequalities Strategy, GLA, September 2018</p>	<p>The London Health Inequalities Strategy sets out a vision to tackle inequalities. It recognises that reducing persistent and widening health inequalities requires commitment and action from a range of organisations, and focuses on areas where the Mayor can make the most difference, through to 2028. Five key aims are:</p> <ul style="list-style-type: none"> ● Healthy Children: Every London child has a healthy start in life ● Healthy Minds: All Londoners share a city with the best mental health in the world ● Healthy Places: All Londoners benefit from an environment and economy that promotes good mental and physical health ● Healthy Communities: London's diverse communities are healthy and thriving ● Healthy Living: The healthy choice is the easy choice for all Londoners <p>The Mayor's key ambitions are:</p>	<p>IIA objectives to reflect the need to improve health for all residents of the borough.</p> <p>The IIA objectives should reflect the objectives of the Mayor's Health Inequalities Strategy</p> <p>The Local Plan to ensure that is sufficient social infrastructure to support the proposed developments and the current and future population of the borough.</p> <p>The Local Plan should contain policies which ensure health provision is available for all residents of the borough.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • To ensure the widespread adoption of the Healthy Early Years Programme London, particularly in the most deprived communities • For more Londoners to be trained in mental health first aid informed approaches, starting with young Londoners • For London to have the best air quality of any major global city, with the quickest progress to be made in the most polluted places • To support more Londoners in vulnerable or deprived communities to benefit from social prescribing • All Londoners are doing the physical activity they need on a daily basis to stay healthy, with efforts focused on supporting the most inactive <p>An implementation plan has been developed by the Mayor and key partners that sets out initial actions to deliver these objectives. Full implementation can only be achieved through a combination of the Mayor's actions and actions of partners, including local and national government.</p>	
<p>The Mayor's Economic Development Strategy for London, GLA, December 2018</p>	<p>The strategy provides a long-term vision for London's economy, setting out plans to create a fairer, more inclusive city with an economy that works for all Londoners. It outlines 14 ambitions for London's economy in 2041:</p> <ul style="list-style-type: none"> • Londoners are living healthier and happier lives • Living standards are improving with real incomes growing year-on-year • London has a fairer and more inclusive economy • London is a more affordable city to live and work • Londoners who want to work, and are able to, have access to quality employment and training opportunities 	<p>The IIA should assess the impact that the policies/proposals within the Local Plan will have on Brent's economy</p> <p>The IIA objectives should reflect the objectives of the Mayor's Economic Strategy.</p> <p>The Local Plan should ensure that the economic growth is catered for in Brent.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • London has the most skilled and talented workforce in the world • London is a global leader in innovation and creativity • London remains the world capital for business, trade and investment • London is the best city in which to start and grow a business • More people are walking, cycling and using public transport to travel, helping London to grow sustainably • London is cleaner, greener and ready for the future • London plays a leading role in the global transition to a low carbon circular economy • London has higher productivity relative to other global cities • London continues to contribute to the UK economy so that London and the UK grow together <p>The strategy includes a number of actions which detail what the Mayor will do to achieve the above vision. Such actions include:</p> <ul style="list-style-type: none"> • Working with London schools, colleges, providers, businesses, universities and London Boroughs to develop a coherent and accessible all-age careers information, advice and guidance offer • Work with trade unions, employers across key sectors and partners across the voluntary, community and social enterprise sector to increase employment rates for groups who are currently underrepresented in London's workforce • Help to increase the supply of housing including affordable homes and help make private renting more affordable • Promote fair pay and good employment practices through the Good Work Standard and help establish London as a Living Wage City • 	
Green infrastructure and Open Environments:	This SPG provides guidance on London Plan (2011) policy 7.20, which seeks to protect and promote geodiversity in London.	IIA objective to reflect the need to protect and promote geodiversity

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Protecting the Geodiversity of the Capital SPG, GLA and London Geodiversity Partnership, March 2012	<p>The SPG:</p> <ul style="list-style-type: none"> • Reviews existing guidance and criteria for geodiversity assessment • Undertake a geodiversity audit of London, including: a regional geodiversity overview; a description of methods and criteria use for the audit; a map and description of each recommended RIGS; good practice guidance on geoconservation for the London Boroughs • Outlines further actions needed to facilitate the implementation and future development of the Geodiversity Action Plan(GAP) for London 	The IIA and Local Plan to take into account this SPG.
Improving Londoners' Access to Nature: London Plan Implementation Report, GLA, February 2008	<p>Improving Londoners Access to Nature is an implementation report which provides non-statutory advice that demonstrates how the aim of improving access to nature can be achieved by identifying opportunities.</p> <p>The report provides details the Mayor's Role, priority sites for alleviating deficiency, priority borough wildlife sites for enhancing access to nature, priority sites for reducing areas of deficiency, the opportunities within the planning and development process, working in partnership and the cost of enhancements.</p>	<p>IIA Objectives should reflect the importance of improving access to green and natural spaces</p> <p>The Local Plan should identify opportunities to improve access to the borough's wildlife sites and open spaces.</p>
London Environment Strategy, GLA, May 2018	<p>The Mayor's Environment Strategy sets out a vision for London's environment, and the Mayor's ambition for London to be the world's greenest global city.</p> <p>The strategy brings together a number of approaches which seek to address a number of areas which impact London's environment, which include: air quality, green infrastructure, climate change mitigation and energy, waste, adapting to climate change, ambient noise and low carbon circular economy.</p>	IIA objectives should reflect the priorities of the Environment Strategy and translate them, as appropriate, to local level.

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<p>Planning for Equality & Diversity in London, GLA, October 2007</p>	<p>The SPG provides guidance on how to implement key London Plan policies which relate to addressing the needs of London's different communities, to ensure that the implementation of the London Plan achieves the Mayor's vision.</p> <p>The document is formed of four different parts, which are as follows:</p> <ul style="list-style-type: none"> • Part 1 – a brief introduction to the SPG and its purpose • Part 2 – Promoting equality and diversity in planning processes – deals with the legislative context to planning for equality, explores equality implications in the new planning system and explains some of the tools that are already available to address equality issues in planning – such as Equality Impact Assessments and Sustainability Appraisals – and set out processes to ensure effective consultation and engagement with equality groups • Part 3 – The key spatial and social issues for London – introduces the complex relationship between spatial planning and wider social issues in the London context of diversity and multiculturalism, it explores how spatial planning can be used to help address inequality and disadvantage and promote community cohesion and identifies key spatial issues for achieving this. • Part 4 – Addressing the spatial needs of target equality groups – considers the key spatial issues faced by each of the equality groups as a result of wider social issues. This parts set out where planning can make a positive impact, with implementation points where appropriate and signposts to further information. 	<p>IIA objectives should reflect the equality and diversity issues contained within the SPG.</p> <p>The Local Plan should include policies which relate to equality and diversity.</p>
<p>Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy, GLA, May 2018</p>	<p>The Strategy sets out how, in all his policies and programmes, the Mayor will work to address various problems (child poverty, disparities in educational attainment, inaccessible transport, employment and pay gaps, knife crime), helping to create a fairer and more inclusive city. 39 objectives are set, which fall under the following chapters:</p>	<p>IIA Objectives should reflect the equality and diversity issues contained within the strategy.</p> <p>The Local Plan should include policies which relate to equality and diversity.</p>

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	<ul style="list-style-type: none"> • A great place to live • A great place to grow up • A great place to work and do business • Getting around • A safe, healthy, green and enjoyable city <p>The strategy also outlines how the Mayor will lead by example in relation to equality and diversity.</p>	
<p>The Mayor's Food Strategy: Healthy and Sustainable Food for London, GLA, December 2018</p>	<p>The Mayor's Food Strategy for London provides a framework to help all Londoners, London Boroughs and partners adapt the city's food system to meet the challenges that lie ahead.</p> <p>The strategy sets out a definition of 'good food', then outlines six key settings. Actions are then derived from each of these key settings. These actions are divided into what the Mayor will do to deliver change, what the Mayor will do to support change, and priorities to be led by external partners. Key settings and aims are:</p> <ul style="list-style-type: none"> • Good food at home, and reducing food insecurity Aim: Help to ensure all Londoners can eat well at home and tackle rising levels of household food insecurity • Good food economy, shopping and eating out Aim: support good food businesses to improve London's food environment and make healthy, affordable options more widely available to Londoners • Good food in community settings and public institutions Aim: work with public sector partners to improve their food procurement for the communities they serve • Good food for pregnancy and childhood Aim: use good food to help give Londoners the best possible start to life 	<p>The IIA objectives should reflect the objectives of the Mayor's food strategy.</p> <p>The Local Plan should include policies which encourage a vibrant food economy and strengthen the borough's food security.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • Good food growing, community gardens and urban farming Aim: Promote the multiple benefits of food growing for individuals and communities • Good food for the environment • Aim: reduce the environmental impact of our food system by making it more efficient, more sustainable and less wasteful 	
<p>Souder City: The Mayor's Ambient Noise Strategy, GLA, March 2004</p>	<p>The Strategy focuses on reducing noise through better management of transport systems, better town planning and better design of buildings. It identifies practical actions and way forward, especially in transport and through the planning system.</p> <p>The overall vision for the Mayor's Ambient Noise Strategy is to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework.</p> <p>To achieve this vision, the Strategy sets the following objectives:</p> <ul style="list-style-type: none"> • to minimise the adverse impacts of road traffic noise; • to encourage preferential use of vehicles which are quieter in their operating conditions; • to minimise the adverse impacts of noise from freight and servicing • to promote effective noise management on rail networks in London • to minimise the adverse impacts of aircraft noise in London, especially at night • to minimise the adverse impacts of noise on or around London's rivers and canals, while retaining working wharves and boatyards, and enhancing water space tranquillity and soundscape quality; 	<p>IIA objectives to consider the impact that the policies/proposals contained within the Local Plan will have on the ambient noise levels of the borough.</p> <p>The IIA objectives should reflect the objectives of the Mayor's Ambient Noise Strategy.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • to minimise the adverse impacts of industrial noise, recognising the use of best practicable means/best available techniques, and the need to retain a diverse and sustainable economy; • to improve the noise environments in • London's neighbourhoods especially for housing, schools, hospitals and other noise-sensitive uses; • to protect and enhance the tranquillity and soundscape quality of London's open spaces, green networks and public realm 	
<p>Mayor's Biodiversity Strategy: Connecting with London's Nature, GLA, July 2002</p>	<p>The Mayor's Biodiversity Strategy aims to protect and enhance the natural habitats of London together with their variety of species. It contains proposals, commitments and targets for the promotion by the Mayor of biodiversity in London. The strategy provides the strategic framework within which the actions plan (identified within London's Biodiversity Action Plans and the Strategy itself) sit.</p> <p>The Strategy sets out the following objectives:</p> <ul style="list-style-type: none"> • Biodiversity for people: to ensure all Londoners have ready access to wildlife and natural green spaces. Access to nature provides psychological, educational and health benefits – an antidote to the stresses of urban life – and the Strategy aims to maintain and increase access to natural green space. • Nature for its own sake: to conserve London's plants and animals and their habitats. • Economic benefits: to ensure the economic benefits of natural greenspace and greening are fully realised. • Functional benefits: to ensure London enjoys functional benefits that biodiversity can bring. • Sustainable development: to recognise biodiversity conservation as an essential element of sustainable development. 	<p>IIA objectives to reflect the need to protect and promote biodiversity.</p> <p>The IIA should assess the impact that the policies/proposals contained within the Local Plan will have on the borough's biodiversity.</p> <p>The Local Plan should include policies which seek to protect and enhance the borough's biodiversity.</p> <p>The Local Plan should include policies which promote the incorporation of biodiversity in new developments.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<p>Proposals contained within strategy include:</p> <ul style="list-style-type: none"> • The Mayor will work with London borough councils, schools and other groups, to enable and encourage children to take an active interest in the biodiversity of their local green space • The Mayor will facilitate best practice for developing safe, convenient and enjoyable access to nature, and addressing issues of safety, anti-social behaviour and fear or crime in green spaces. • The Mayor will encourage and support all London borough councils in the establishment of local biodiversity partnerships and the production, implementation and monitoring of borough Biodiversity Action Plans as an integrated element of the delivery and implementation of Community Strategies • The Mayor will measure the success of this Strategy primarily against two targets, to ensure: <ul style="list-style-type: none"> ○ That there is not net loss of Sites of Importance of Nature Conservation, and ○ That the areas of deficiency in accessible wildlife sites are reduced 	
<p>London Biodiversity Action Plan, London Biodiversity Partnership, 2001</p>	<p>The London Biodiversity Action Plan (BAP) identifies priority habitats that are of particular importance for biodiversity in London. Many of these habitats are covered by Habitat Action Plans (HAPs).</p> <p>The London BAP has 11 HAPs – 9 of these are for named habitat types, while the other two are for land uses. 214 priority species were under particular threat in London.</p>	<p>IIA objectives to reflect the need to protect and promote biodiversity.</p> <p>The IIA will assess the impact that the policies/proposals contained within the emerging Local Plan will have on the borough's biodiversity.</p> <p>The Local Plan should include policies which seek to protect and enhance the borough's biodiversity.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
		<p>The Local Plan should include policies which promotes biodiversity as part of new developments.</p> <p>Where appropriate, the emerging Local Plan should take into account the actions contained within the London BAP.</p>
<p>Thames Basin District River Basin Management Plan, DEFRA, 2015</p>	<p>The Plan provides a framework for protecting and enhancing the benefits provided by the water environment within the Thames river basin district. It also identifies significant water management issues and provides a progress update on the 2009 plan.</p> <p>The Plan contains 4 sets of information, which are:</p> <ul style="list-style-type: none"> • Baseline classification of water bodies –establishes the current status for all the quality elements in each water body. • Statutory objectives for protected areas - highlights the areas of land and bodies of waters that have specific uses that need special protection. The plan ensures that these areas have the legally binding objectives in place that protect water uses (i.e. drinking water, bathing, commercial shellfish harvesting) from potentially harmful activities and new developments • Statutory objectives for water bodies – sets out legally binding objectives for each quality element in every water boy, including an objective for the water body as a whole. The default objective is good status. • Summary programme of measures to achieve statutory objectives – provides a framework for action and future regulation. This section summarises the existing mechanisms, both statutory and voluntary, that are used to manage the quality of the water environment. It also 	<p>The IIA objectives should reflect the environmental objectives of the management plan to protect and improve water quality.</p> <p>The Local Plan should take into account the local measures in the management plan in terms of improving water quality.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	summarises the types of actions and who needs to do this, to achieve the statutory objectives.	
Part 2: River basin management planning overview and additional information, DEFRA, 2016	<p>Part 2 of the Thames Basin Direct River Basin Management Plan contains a summary of technical, economy and engagement processes used to develop the Plan.</p> <p>This document contains information that the WFD requires to be part of each plan and provides more detail about the process the Environment Agency and others have followed in reviewing and updating the plans. It also puts river basin management planning and the plans into the wider context of managing the water environment in England.</p>	As above.
The London Rivers Action Plan and UK Projects Map, The River Restoration Centre, January 2009	<p>The Action Plan has been developed to provide a delivery mechanism to take forward London's river restoration strategies. The Plan will build upon the river restoration strategies success and look for river restoration opportunities.</p> <p>The Plan:</p> <ul style="list-style-type: none"> • Supports the delivery of the Thames River Basin Management Plan under the Water Framework Directive • Contributes to sustainable regeneration through the implementation of the Blue Ribbon policies • Contributes to the implementation of the Mayor's access to nature aspirations • Supports one of the London Plan's biodiversity targets to restore 15km of river by 2015 • Supports the delivery of the Environment Agency's Thames Catchment Flood Management Plan. <p>The five key aspirations identified within the Plan are:</p> <ol style="list-style-type: none"> 1. Improve flood management using more natural processes; 2. Reduce the likely negative impacts of climate change; 	<p>The IIA objectives should reflect the environmental objectives of the plan to protect and improve water quality.</p> <p>The Local Plan should take into account the aspirations of the action plan and projects in the River Brent Catchment.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	3. Reconnect people to the natural environment through urban regeneration; 4. Gain better access for recreation and improved well-being; 5. Enhance habitats for wildlife.	
Brent River Corridor Improvement Plan, Brent River Catchment Partnership, 2014	<p>The Brent River Corridor Improvement Plan identifies a number of actions that can be undertaken to improve the water quality of this catchment and achieve the outcomes listed below.</p> <p>The Improvement Plan contains the following vision:</p> <p><i>To improve and enhance the rivers within the Brent Catchment, making them cleaner, more accessible and more attractive, to benefit local communities and wildlife.</i></p> <p>The following outcomes were identified within the Plan:</p> <ul style="list-style-type: none"> • By 2021, water quality in the Brent catchment has improved and has a 'moderate' ability to support wildlife; and by 2027 it will have a 'good' ability to support wildlife • Transforming up to 10km of heavily modified river to a more natural condition by 2021 • Decreasing density and distribution of invasive non-native species in chosen locations by at least 20% by 2021. • Having Giant Hogweed under a management programme in all parks, reserves and pathways by 2015 • Completing a 24-mile riverside trail from Barnet to Brentford on the Thames. • Creating or improving 12 miles of riverside access for walking, cycling and the disabled through the catchment • Creating at least to new green spaces along waterways in the Brent catchment by 2021. 	<p>The IIA objectives should reflect the environmental objectives of the plan to protect and improve water quality.</p> <p>The Local Plan should take into account the local measures in the improvement plan in terms of improving water quality.</p>
Joint West London Waste Plan, 2015	Six west London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) and the Old Oak Common and Park Royal Development Corporation (OPDC) have joined	The IIA should consider the issues around waste and recycling and the

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	<p>together to plan for the future management of waste produced in their areas.</p> <p>The West London Waste Plan:</p> <ul style="list-style-type: none"> • Details the estimated amounts for the different types of waste that will be produced in West London up to 2031 • Identifies and protects the current sites to help deal with that waste; • Identifies the shortfall of capacity needed over the life of the Plan (to 2031); and • Allocates a set of sites to meet the shortfall which are preferred for waste related development. <p>In addition to the above, the Waste Plan provides policies with which planning applications for waste developments most conform.</p>	<p>possibility of utilising waste as a means of power generation.</p> <p>The Local Plan should consider issues around waste management and the possibility of utilising waste as a means of power generation.</p> <p>The Local Plan should contain policies which contribute to achieving the waster targets set out in the London Plan (which have been incorporated into the Joint West London Waste Plan)</p>
<p>West London Sub Regional Transport Plan, Transport for London, 2016 update</p>	<p>The update provides a comprehensive analysis of recent population and employment growth, changes in travel behaviour and areas where the transport network will have to change to cope with the challenge of future growth.</p> <p>The Plan aims to help boroughs with the development of Local Implementation Plan (LIP) and TfL in developing the priorities for business planning in order to address the medium to longer-term challenges for London and the sub-regions.</p> <p>The document identifies the following challenges to be relevant to every sub-region</p> <ul style="list-style-type: none"> • Improve air quality to meet and exceed legal requirements and ensure health benefits for Londoners • Transport the role of cycling and walking the sub-region 	<p>The IIA will consider the impact that policies/proposals will have with regard to sustainable transport</p> <p>IIA objectives to reflect the need to promote sustainable modes of transport.</p> <p>The Local Plan will include policies which promote sustainable modes of transport.</p> <p>Where appropriate, the emerging Local Plan will help to identify and promote solutions to the west London specific challenges identified within this document.</p>

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	<ul style="list-style-type: none"> • Meet CO₂ targets <p>The document identified the following challenges as being west London specific:</p> <ul style="list-style-type: none"> • Enhance east-west capacity and manage congestion • Improve access to, from and within key locations • Enhance the efficiency of freight movement • Improve north-south public transport connectivity • Improve land-based air quality 	
<p>NW London Sustainability and Transformation Plan – Our plan for North West Londoners to be well and live well, NW London STP System, October 2016</p>	<p>The STP describes the shared ambition across health and local government to create an integrated health and care system that enables people to live well and be well. The STP sets out how the NHS will meet the needs of the population more effectively.</p> <p>TP states that <i>“The focus of the STP for the first two years is to develop the new proactive model of care across NW London and to address the immediate demand and financial challenges”</i>.</p>	<p>The IIA and Local Plan objectives to support the NW London Sustainability and Transformation Plan.</p>
Local		
<p>Brent Borough Plan 2019 - 2023</p>	<p>The Brent Borough Plan sets out how the Council, working with partners, will build a better Brent.</p> <p>The Borough Plan sets out the following vision for Brent:</p> <p><i>“Our vision for 2023 is to make Brent a borough of culture, empathy, and shared prosperity. A borough where people from different backgrounds feel at ease with one another, share in cultural opportunities and activities, and value the principles of fairness, equality, good citizenship and respect for people and</i></p>	<p>IIA objectives should reflect and build upon the Borough Plan’s vision and priorities.</p> <p>The Local Plan must be in conformity with the Brent Borough Plan.</p>

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	<p><i>place. People will feel that they and their children are safe, cared for and can achieve and that they receive excellent services when they need them. Brent will be a great place to live and work, where business and enterprise prosper and local people have opportunities to change their lives for the better.”</i></p> <p>The plan states that while the vision remains similar to that set out in the previous Borough Plan, the context within which we are operating continues to change. The Borough Plan is centred around five priorities:</p> <ul style="list-style-type: none"> • A borough where we can all feel safe, secure, happy and healthy <ul style="list-style-type: none"> ○ Reduction in anti-social behaviour, risk of harm and re-offending ○ Reduction in violent crime, including gang and knife crime ○ Support our most vulnerable adults, enabling them to choose and control services they receive, remaining independent and leading active lives ○ Improve health of Brent residents ○ Make Brent a place where culture is celebrated and vibrant • A cleaner, more considerate Brent <ul style="list-style-type: none"> ○ Improvement in air quality ○ Reduction in illegally-dumped rubbish • A future built for everyone, an economy fit for all <ul style="list-style-type: none"> ○ Increase in inward investment achieved via the council ○ Produce our new Local Plan, setting out our vision, priorities and areas for future development in the borough ○ Increase in housing supply 	

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	<ul style="list-style-type: none"> ○ Reduction in number of households in temporary accommodation ○ Keep traffic moving and our roads and pavements in good repair ● Every opportunity to succeed <ul style="list-style-type: none"> ○ Improvement in Key Stage results for Black Caribbean Boys ○ Improvement in Key Stage results for looked-after children and care leavers ○ High-level skills achievement ○ Increase in average wage ● Strong Foundations <ul style="list-style-type: none"> ○ Enable more residents to get online ○ Making every pound count ○ Building services around residents and their needs ○ Increase in resident satisfaction ○ Increase in resident involvement 	
Brent Inclusive Growth Strategy, 2019-2040, Brent Council	<p>Brent's Inclusive Growth Strategy looks at ways to realise future opportunities in a way which will increase the borough's economic resilience and enhance its offer to residents, businesses and visitors over the next 20 years and beyond. Of equal importance will be ensuring that everyone, no matter their background, has the choice to participate and benefit from growth in the borough.</p> <p>To set the scene, the strategy looks at five elements: People, Place, Prosperity, Lifestyles and Globalisation. Each section looks at the key facts, trends and analysis related to the main factors viewed as likely to have an impact on the borough going forward.</p> <p>The strategy then looks at the top trends and council responses in relation to the following: Economy, Housing, Infrastructure, Environment, Health and Culture.</p>	IIA objectives should reflect and build upon the trends identified and responses suggested in the strategy.

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<p>Brent's Air Quality Action Plan 2017-2022, Brent Council</p>	<p>Brent's air quality action plan demonstrates how the Council will tackle air pollution at the source or reduce exposure where this is not possible.</p> <p>The Air Quality Action Plan identifies that Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀) are the pollutants of most concern in the borough. The majority of Brent is within an Air Quality Management Area (AQMA). The air quality outside of the air quality management area has not worsened since 2006 and so new management areas for air quality action are proposed.</p> <p>The Air Quality Matrix outlines the 24 actions Brent will implement to deliver air quality improvement. These actions are split into six themes which focus on measures to reduce pollutant emissions from key sources.</p>	<p>The IIA of the Local Plan will consider the impact that the proposed policies/developments within the emerging Local Plan will have on the air quality in the borough.</p> <p>IIA objectives to reflect the need to improve air quality.</p> <p>The Local Plan and IIA will take account of Brent's Air Quality Action Plan, and where appropriate, contribute to its delivery.</p>
<p>Brent Biodiversity Action Plan, 2007, Brent Council</p>	<p>The Brent BAP Plan sets out actions to improve the natural environment in Brent to achieve the targets of the Local Biodiversity Action Plan.</p> <p>The Brent BAP includes Habitat Action Plans for the following:</p> <ul style="list-style-type: none"> • Garden and Allotments • Street scene • Trees, Woodland and Hedgerows • Grasslands • Wetland Habitats • Rail-side Habitats • Churchyards and Cemeteries • Parks and Green Spaces • School Grounds • Buildings and the built environment <p>In regards to Species Action Plan, the Brent BAP proposes to:</p>	<p>IIA objectives to reflect the need to protect and promote biodiversity.</p> <p>The IIA will consider the impacts that policies/proposals contained within the emerging Local Plan will have on the boroughs biodiversity.</p> <p>The Local Plan should include policies which promote the incorporation of biodiversity in new developments</p> <p>Where appropriate, the emerging Local Plan should take into account the actions contained within the Brent BAP.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • Adopt and implement all the London-wide and UK Species Action Plans that are applicable, or potentially applicable, to the Brent area. • Seek 'champions' for the above and other Species Action Plans to encourage the conservation of selected individual species 	
Brent's Long Term Transport Strategy, 2015-2035, Brent Council	<p>The Long Term Transport Strategy outlines the Council's commitment to improving transport options for every member of the community and to reducing the negative impacts of transport on the borough. The Strategy provides a strategic direction for investment in transport through the borough of the period 2015-2035.</p> <p>Five priority areas are identified which will be focussed on during the period of the strategy. These areas are:</p> <ul style="list-style-type: none"> • Road safety • Air Quality • Health • Congestion • Growth and Regeneration <p>The Strategy also contains five objectives which have been formulated to reflect the priorities in a measurable context. These objectives are as follows:</p> <ul style="list-style-type: none"> • Increase the uptake of sustainable modes, in particular active modes of travel • Reduce conventional vehicular trips on the network, particularly at peak time • Support growth areas and town centres to enable acceptable development • Reduced Killed and Seriously Injured (KSI) incidents and slight accidents on Brent's roads 	<p>IIA objectives to reflect the need to promote the use of sustainable transport.</p> <p>The IIA will consider the impact that the policies and proposals contained within the emerging Local Plan will have on sustainable transport modes.</p> <p>The Local Plan will contain policies with promote sustainable transport.</p> <p>The Local Plan will support the aims and objectives contained within the Long Term Transport Strategy.</p>

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	<ul style="list-style-type: none"> Reduce the exposure of Brent residents to Particulate Matter (PM) and Nitrogen Dioxide (NO₂) generated by the transport network <p>These objectives have informed the targets that are set out within the document.</p>	
Brent's Cycling Strategy, 2016-2021, Brent Council	<p>The Cycling Strategy is a daughter document to the Long Term Transport Strategy (LTTS) and will help to implement the objectives it contains. The cycle strategy provides a framework that will enable the Council to implement works in a transparent way and prioritise funds to increase cycling through the borough.</p> <p>The Council's vision for cycling in Brent is:</p> <ul style="list-style-type: none"> To make Brent a borough where everyone can cycle safely, in comfort and with confidence To enable people of all ages and abilities from every section of Brent's diverse society to see cycling as a good option for everyday travel <p>To achieve the above vision the Strategy sets the following objectives:</p> <ul style="list-style-type: none"> Develop a coherent network of direct, comfortable and attractive cycle routes Promote cycling as a convenient, safe, health, enjoyable and inclusive activity Reduce the number of accidents on Brent's roads involving cyclists Improve access to cycling for all Brent residents and businesses Address the specific concerns that may reduce the ability of some groups to take up cycling 	<p>IIA objectives to reflect the need to promote the use of sustainable transport.</p> <p>The IIA will consider the impact that the policies and proposals contained within the emerging Local Plan will have on sustainable transport modes,</p> <p>The Local Plan will contain policies which promote sustainable transport.</p> <p>The Local Plan will support the aims and objectives contained within the cycling strategy.</p>

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	<p>The Strategy contains an Action Plan which is designed to help achieve the targets contained within the Brent Cycle Strategy and the LTTS.</p>	
<p>Brent's Walking Strategy, 2017-2022, Brent Council</p>	<p>The Walking Strategy is a daughter document to the Long Term Transport Strategy (LTTS) and will help to implement the objectives it contains.</p> <p>The Council's vision for walking is: <i>"Make Brent a healthy, active and safe borough where walking is a practical and pleasant option for all"</i>.</p> <p>To achieve the above vision the Strategy sets the following objectives:</p> <ul style="list-style-type: none"> • Provide a better environment and improve the experience of walking within the borough, ensuring it is accessible and inclusive for all • Promote walking as a healthy and sustainable way to travel as well as to increase personal activity • Improve the perceived and actual safety and security of pedestrians <p>The Strategy contains an Action Plan which is designed to help achieve the targets contained within the Brent Walking Strategy and the LTTS.</p>	<p>IIA objectives to reflect the need to promote the use of sustainable transport.</p> <p>The IIA will consider the impact that the policies and proposals contained within the emerging Local Plan will have on sustainable transport modes.</p> <p>The Local Plan will contain policies which promote sustainable transport.</p> <p>The Local Plan will support the aims and objectives contained within the walking strategy.</p>
<p>Planning for Sports and Active Recreation Facilities Strategy 2008-2021, Brent Council and Sport England, 2007</p>	<p>The Strategy sets out a plan for the development of sport facilities in the borough between 2008-2021 and proposes local planning standards.</p> <p>The overall vision for the strategy is:</p> <p><i>To ensure the co-ordinated, strategic development of formal and informal facilities for sport and active recreation within Brent that meets the needs of a changing multi-cultural population and provides attractive, sustainable, accessible, quality facilities that enhance the Boroughs natural and built environment. Such</i></p>	<p>IIA objectives to reflect the need to ensure that there is sufficient social infrastructure to support the growing population.</p> <p>The Local Plan will take into account this strategy, and where appropriate assist in the delivery of sports facilities.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<p><i>provision will increase opportunities for participation in sport and active recreation by all sections of the community resulting in improved health, well-being and enhanced quality of life of Brent's resident.</i></p> <p>In order to achieve the above vision, a number of key objectives have been identified</p> <ul style="list-style-type: none"> • Strategic Provision – to ensure there is a planned approach to the provision of a local and strategic mix of facilities • Meets need of future populations – to provide an innovative approach to the provision of facilities that can meet the future needs of a growing population • Delivers on sustainability principles – to ensure that sustainability is at the forefront of all sport and recreation provision particularly in relation to design, construction, use of natural resources and sustainable transport to assure respect for the environment. • Provides access for all – to ensure that sport and recreation facility providers commit to extensive, well managed, affordable community access for all • Maximises a facility's lifespan – to ensure that mechanisms and funding are in place to secure regularly facility maintenance to enhance the lifespan of the facility and maintain quality standards of provision • Create a safe and secure environment – to embrace a design-led approach to new sports facilities that helps to reduce crime and the fear of crime • Seeks contributions for sports provision from developers - to secure appropriate funding for sports provision from new residential development in the borough to help meet the sporting needs of a growing population 	
Food Growing and Allotments strategy and	The Strategy unites allotment and food growing provision in Brent under a single vision and set of objectives and action plan.	The IIA objectives should reflect the objectives of the strategy.

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<p>associated Action Plans, Brent Council</p>	<p>It highlights what is currently done well, what needs to be reviewed, objectives and opportunities for future development and how performance will be measured.</p> <p>The vision of the Food Growing and Allotment Strategy is to provide a range of food growing opportunities accessible to all parts of the community and to promote the benefits of a healthy lifestyle within a green borough.</p> <p>This vision will be achieved through the delivery of the following objectives.</p> <ol style="list-style-type: none"> 1. To provide efficiently managed allotment sites that offer good value for money and are accessible to all 2. To develop and broaden the range of food growing opportunities available through increased partnership working 3. To promote the benefits of food growing as part of a healthy lifestyle within a greener borough. <p>For each objective, the Action Plan identifies a number of actions which can assist in them being met.</p> <p>The Action Plan contained within the strategy has been reviewed twice; once for 2012/14 and the other for 2014/16. In the latest review contained 15 actions – 7 under objective, 4 under objective 2 and 4 under objective 3. Actions included:</p> <ul style="list-style-type: none"> • 1.1 – Using the site audit list of recommended actions for allotment sites, implement prioritised improvements works and repairs as and when funding is available. • 1.5 – Review cycle stand provision • 2.4 – Investigate options for integrating food growing space provision into planning guidance on a permanent basis and explore future food growing opportunities in regeneration 	<p>The Local Plan should take into account the Council's Food Growing and Allotments Strategy</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<p>areas and existing housing with a view of creating new food growing spaces:</p> <ul style="list-style-type: none"> ○ Inclusion in the Wembley Area Action Plan (WAAP) ○ Inclusion in the Local Development Framework ○ Timetable for designation of allotment sites as SINC ○ Complete projects at St Raphael's and Bramshill <ul style="list-style-type: none"> ● 3.3 – Produce a conservation plan for features of wildlife importance and protected species 	
<p>Brent School Place Planning Strategy 2019 - 2023, November 2018, Brent Council</p>	<p>The Brent School Place Planning Strategy identifies the Council's commitment to promoting the wellbeing, safety and achievement of Brent children and to promote high standards that help all children to fulfil their potential. The Council has a statutory duty to ensure that there are sufficient school places available for all Brent children and young people who need one.</p> <p>The Strategy articulated the following aspirations for Brent schools:</p> <ul style="list-style-type: none"> ● All Brent schools should be good or outstanding, with an increased proportion of schools outstanding, over the duration of the strategy ● All Brent schools thrive in effective partnerships with other schools, promoting resilience and mutual support ● The Council and schools should work together to meet the challenge of providing sufficient school places ● Schools should operate in good quality, safe premises ● Children should be educated close to home ● Schools should work with their local communities they serve ● The Council and schools work in partnership to effectively meet the needs of children with Special Educational Needs and Disabilities ● The Council and schools make efficient use of resources. 	<p>IIA objectives should reflect the need to ensure that there are sufficient school places across the borough</p> <p>The Local Plan should take into consideration the demand for school place provision in the borough</p>

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	<p>The strategy outlines a set of sixteen operating principles that underpin the above aspirations.</p> <p>The projections used to inform the strategy indicate the following:</p> <ul style="list-style-type: none"> • Much of the focus on demand for mainstream provision is on places in Reception for infant and primary schools and Year 7 for secondary schools • Where there are a number of new housing developments, growth in demand is anticipated that could change school place demand patterns. • Demand for Reception will continue to reduce before recovering to the current level in 2022. • A need for an additional 13 forms of entry by 2023/2024. • Demand for places that meet the needs of children and young people with SEND is increasing – Brent is planning to commission additional secondary special places to cater for pupils with ASD / MLD / SLD. 	
<p>Brent Equality Strategy 2019-2023, Brent Council, 2019</p>	<p>Sets out how effective diversity and equality practice will be fully integrated into everything that the Council does.</p> <p>The strategy seeks to ensure that the Council fulfils the duties placed on them by the Equality Act 2010.</p> <p>The develop the council's equality objectives, the council consulted with the community and its partners. The strategy sets out the following objectives:</p> <ol style="list-style-type: none"> 1. Understand the barriers to equality experienced in Brent and act to remove them 2. Provide accessible information and services that are tailor to peoples' needs 3. Tackle hate, harassment and victimisation 4. Lead the way in encouraging diversity to flourish in Brent 	<p>IIA objectives should reflect the equality objectives outlined in the strategy.</p> <p>The Local Plan should include policies which relate to equality and diversity.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<p>The Equality Strategy states that an action plan will be created setting out how the council will measure progress against these objectives. This will be reviewed regularly.</p>	
<p>Financial Inclusion Strategy, September 2015, Brent Council</p>	<p>The Council's Financial Inclusion Strategy focuses on how the Council will create an inclusive environment where individuals are confident and capable of making the right decisions for themselves and their families.</p> <p>The strategy has four strategic objectives, which are:</p> <ul style="list-style-type: none"> • Help residents to move from unemployment or low skill/pay employment to sustainable and fulfilling employment; • Helping residents overcome high levels of debt and promote responsible borrowing • Improve access to mainstream financial products and services whilst encouraging residents to build their awareness of financial services and make appropriate choices with their finances; and • Maximising opportunities for delivering financial inclusion through working in partnership <p>The strategy details the Council's 'what works' approach to particular challenges of financial exclusion. It also proposes to create a high level Financial Inclusion Partnership that and that the council facilitates working groups as far as reasonably practical.</p>	<p>IIA objectives to reflect the need to ensure high quality employment opportunities and encourage enterprise and innovations</p> <p>The IIA will include consideration of the potential effects of the emerging Local Plan on the economy and employment.</p> <p>The IIA and Local Plan will take into consideration the Financial Inclusion strategy</p>
<p>Brent Health & Wellbeing strategy, 2014-2017, Brent Council and NHS Brent</p>	<p>The Health and Wellbeing Strategy seeks create an environment in Brent that enables individuals and families to lead healthy lives, and where health and wellbeing is at the heart of service delivery.</p> <p>The aim of the Health and Wellbeing Strategy is to</p> <ul style="list-style-type: none"> • Improve health and wellbeing • Reduce health inequalities <p>The strategy identifies a number of priority areas, which includes:</p> <ul style="list-style-type: none"> • Giving every child the best start in life • Helping vulnerable families 	<p>IIA objectives to reflect the need to address the cause of poor health and wellbeing.</p> <p>IIA to assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • Empowering communities to take better care of themselves • Improving mental wellbeing • Working together to support the most vulnerable adults in the community <p>For each priority area, the key issues have been highlighted and a number of objectives identified.</p>	<p>The Local Plan should consider public health.</p> <p>The Local Plan should contain policies which ensure health provision is available for all residents of the borough.</p>
Safer Brent Partnership Community Safety 2018-2021 strategy, Brent Council	<p>The Safer Brent Partnership Community Safety Strategy sets out how crime and anti-social behaviour will be tackled, and outlines the main priorities for the Community Protection team. The strategy is intended to complement and join up with the Stronger Communities Strategy, with this strategy focusing on mitigating crime, abuse and disorder as it occurs.</p> <p>The updated priorities for the 2018-2021 strategy are:</p> <ul style="list-style-type: none"> • Reducing Domestic and Sexual Abuse • Reducing the impact of Gangs and / or Knives in our community • Reducing Vulnerability and increasing Safeguarding • Reducing Offenders and Perpetrators from Reoffending • Reducing Anti-Social Behaviour 	<p>IIA objectives to reflect the need to improve community safety and reduce crime.</p> <p>The Local Plan to take into account the Council's Safer Brent Partnership Community Strategy.</p>
Stronger Communities Strategy 2019-2023, Brent Council	<p>The Stronger Communities Strategy sets out the Council's four-year strategic approach to sustaining and building stronger communities. The strategy is central to the council's overall vision set out in the Borough Plan (2019-2023), which is to make Brent a borough of culture, empathy and shared prosperity. The over-arching aim of Brent: Stronger Together is to work with partners, communities and residents to make Brent stronger, more active and cohesive.</p> <p>The following elements are integral to the priorities of this strategy:</p>	<p>IIA objectives to reflect the need to improve quality.</p> <p>IIA objectives to reflect the need to improve community safety and reduce crime.</p> <p>The Local Plan to take into account the Council's Stronger Communities Strategy.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • Tackling poverty • Tackling extremism • Engaging new and emerging communities • Tackling underachievement • Promoting gender equality <p>A number of commitments are made in relation to each of the priorities above.</p>	
<p>Employment, skills and enterprise strategy 2015-20, Brent Council</p>	<p>The Employment, Skills and Enterprise Strategy sets out how Brent aims to capitalise on the growth opportunities available in Brent (such as at Old Oak Common, Wembley and Alperton) by ensuring that the new investment brings new jobs as well as new homes and by making sure that the Borough's established businesses and residents are able to benefit first hand from the new opportunities created.</p> <p>The vision of the strategy is <i>"to reduce inequality and raise living standards in Brent through economic growth and employment"</i>, with a long-term ambition that in 20 years the levels of employment in Brent will be comfortably above the London average.</p> <p>The Strategy has the following strategic objectives:</p> <ul style="list-style-type: none"> • To promote economic growth through regeneration, increasing the number of local jobs providing new opportunities for local businesses • To ensure that local education and skills provision is reflective of the demands of the labour market, providing a labour pool made up of well qualified and highly motivated individuals • To have a strong focus on addressing inequality by reducing economic and social polarisation within our most deprived neighbourhoods and amongst those residents who are furthest away from work. 	<p>The IIA will include consideration of the potential effects of the emerging Local Plan on the economy and employment</p> <p>IIA objectives to reflect the need to improve education and skills</p> <p>IIA objectives to reflect the need to encourage high quality employment opportunities and encourage enterprise and innovation.</p> <p>The Local Plan should seek to protect and enhance the borough's employment and industrial land to ensure employment needs are met.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • To reduce poverty through employment and progression in work • To secure increased local influence over national and regional employment programmes so as to deliver better outcomes for Brent residents <p>A number of outcomes is associated with each strategic objective which will help to deliver the vision of the strategy.</p>	
A Regeneration Strategy for Brent 2010-2030, Brent Council	<p>The Regeneration Strategy aims to proactively respond to the opportunities and challenges brought by the new political and economic environment.</p> <p>The Strategy includes the following strategic priorities:</p> <ul style="list-style-type: none"> • To deliver transformation change across the borough, focusing primarily on the identified priority areas for investment. These areas are Alperton, Burnt Oak, Chalkhill, Church End, Harlesden, North Circular (Including Brentfield and St Raphael's), Stonebridge, South Kilburn and Wembley. • To increase employment and income levels of Brent resident's concentration on those most in need. • To maximise investment in Brent from the private, public and community sectors in line with our regeneration priorities and ambitions <p>Associated with each strategic priority is a number of actions. The Strategy also identifies a number of performance indicators for each strategic priority to enable the success of this strategy to be measured.</p>	The Local Plan and IIA will take into account the Regeneration Strategy.
Capital Investment Strategy, 2016-2020, Brent Council	The Capital Investment Strategy sets the framework through which the capital programme helps to deliver the Council's key priorities. The investment strategy shifts the focus of the Council's capital expenditure plans from on "fundamental" of "game-changing"	The Local Plan an IIA will take into account the Capital Investment Strategy

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<p>investment in infrastructure with the potential to transform the long term economic prosperity of the borough and its residents.</p> <p>The initial focus of the strategy is on meeting short-term housing need, through the temporary accommodation reform strategy.</p> <p>Over the medium to longer term the focus of the investment strategy will shift to ensure the opportunities in the borough can be seized. This will include:</p> <ul style="list-style-type: none"> • Investment in major development sites – OPDC, Wembley & Alperton Housing Zones; Harlesden, Stonebridge and Willesden opportunity sites; regeneration in church end and bridge park • Revitalising high streets as major retail destinations • Examining the case for investment in heat networks and power generation • Considering how to attract more jobs, and more high quality jobs in the borough • Strategic property acquisitions to enable regeneration 	
Flood Risk Management Strategy, Brent Council	<p>The Flood Risk Management details the actions that the Council and other key stakeholders are taking to manage flood risk in Brent. It sets out the flood risk in Brent, by discussing the flood history, the geography of Brent, likely sources of flood and the overall risk of flooding for Brent.</p> <p>The strategy has the following five Objectives:</p> <ul style="list-style-type: none"> • Improving the understanding of flooding risks in Brent. • Reducing the risk of flooding for people and businesses in Brent. • Providing clear information on the roles and responsibilities of everyone involved in flood risk management in Brent. 	<p>IIA objectives to reflect the need to address flooding</p> <p>The Local Plan will support the implementation of the flood risk management strategy.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> • Ensuring that emergency plans and responses to flood incidents in Brent are effective. • To take a sustainable and holistic approach to flood management, seeking to deliver wider environmental and social <p>The Strategy includes a summary of actions, each of which is relevant to one of the above objective that Brent Council and other relevant stakeholders are undertaking to deliver the objectives of the Strategy.</p>	
Climate Change Strategy, Brent Council	<p>The Council's Climate Change Strategy identifies the possible impacts of climate change on the borough and identifies the opportunities and challenges the Council needs to take into account when planning to tackle climate change.</p> <p>The Strategy has the following three aims:</p> <ul style="list-style-type: none"> • To cut emissions produced by the borough • To enable Brent to cope with extreme weather • To adapt to climate change <p>To achieve the above aims, the strategy set out the following 5 objectives:</p> <ol style="list-style-type: none"> 1. To secure commitment from all relevant partners to act 2. To achieve wide-ranging and inclusive solutions to the challenges of climate change 3. To provide user-friendly information to those who need it 4. To collect evidence and continually assess progress 5. To mainstream climate change into our everyday activities 	<p>The IIA should consider the potential impacts of the emerging Local Plan in terms of issues around climate change.</p> <p>The IIA objectives should be in line with the objectives identified within this strategy</p> <p>The Local Plan should consider issues around climate change.</p> <p>Where applicable, the emerging Local Plan should support the aims and objectives of the Council's Climate Change Strategy</p>
Draft Housing Strategy, 2017 – 2022, Brent Council	<p>The 2017-2022 draft Housing Strategy updated the 2014 housing strategy to take into account the political and economic changes.</p> <p>The draft housing strategy has the following ambition:</p>	<p>IIA objectives should reflect the need to secure housing and meet identified need, particularly affordable housing.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<p data-bbox="595 233 1476 363"><i>“A housing market that provides a range of housing options to meet the diverse needs and aspirations of Brent’s residents, enables social and economic mobility and supports access to decent, affordable accommodation for all”.</i></p> <p data-bbox="595 400 1435 464">The Strategy also identifies a number of priorities and objectives, which are as follows:</p> <ul style="list-style-type: none"> <li data-bbox="645 472 1476 1209"> <p data-bbox="645 472 904 504">• Housing Supply.</p> <ul style="list-style-type: none"> <li data-bbox="741 507 1402 571">○ Priority – to significantly increase the supply of affordable housing <li data-bbox="741 574 1476 738">○ Objective (Affordable Housing Supply) – to increase the capacity to meet housing needs and support social mobility through the provision of 5,000 Affordable Rent and Low-cost Home Ownership properties by 2019. <li data-bbox="741 742 1476 938">○ Objective (Larger house and reducing overcrowding) – to ensure that at least 35% of new general needs affordable rented housing is 3 bedroom or larger, to align with the demand profile. To halve severe overcrowding in the social housing sector by 2019. <li data-bbox="741 941 1476 1074">○ Objective (Private renting and low cost home ownership) – the development of 1,000 build-to-rent homes by 2019, of which at least 30% are affordable to those on lower incomes <li data-bbox="741 1077 1476 1209">○ Objective (Supported housing supply) – to deliver a programme of extra-care and specialist supported housing units by 2019 to widen housing options and reduce reliance on residential care <li data-bbox="645 1212 1476 1350"> <p data-bbox="645 1212 1010 1244">• Housing and wellbeing</p> <ul style="list-style-type: none"> <li data-bbox="741 1248 1476 1350">○ Priority – to promote wellbeing and reduce economic and social exclusion through an integrated approach to housing and wider service provision 	<p data-bbox="1503 233 2007 328">The Local Plan should seek to provide enough dwellings to meet the boroughs objectively assessed need.</p> <p data-bbox="1503 368 1984 432">The Local Plan will take into account the draft Housing Strategy.</p>

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> ○ Objective (Integrated Housing and Employment Support) – to integrate housing advice and management services with employment guidance and support ○ Objective (economic and Social Deprivation) - to reduce economic and social polarisation by achieving significant convergence between priority neighbourhoods and the borough as a whole by 2019 ○ Objective (Energy Efficiency and Fuel Poverty) - to improve the energy efficiency of the housing stock through programmes of retrofit works ○ Objective (Tenancy Strategy and Allocations) – to foster support wellbeing through access to suitable and affordable housing ● Private renter sector improvement <ul style="list-style-type: none"> ○ Objective - To maximise the contribution of the private rented sector to meeting housing need and demand through the provision of decent and well-managed accommodation ○ Objective (Standards) - for all private rented properties in the borough to achieve minimum standards of management and condition by 2019 ○ Objective (Access) – to establish a lettings agency and other arrangement to increase access to meet housing need ● Homelessness and allocations <ul style="list-style-type: none"> ○ Objective - to significantly reduce levels of homelessness and the use of temporary accommodation ○ Objective (Prevention) – to reduce the number of homeless acceptances to below the London average by 2019# 	

Plan or Programme Title	Summary of targets/indicators/objectives	Implications for IIA/Local Plan
	<ul style="list-style-type: none"> ○ Objective (Temporary Accommodation) – (a) to minimise the use of Bed and Breakfast Accommodation and eliminate the use of non-self-contained B&B for more than six weeks. (b) To reduce the number of households in temporary accommodation to the London average by 2019 ● Social Housing Improvement <ul style="list-style-type: none"> ○ Objective - to improve the quality of the existing social housing stock and ensure its efficient use ○ Objective (Council Housing Investment) – to maintain the decent homes standard and complete a programme of maintenance and improvement across the council’s housing stock by 2021 ○ Objective (Maximising Use of Social Rented Homes) – to maximise the efficient use of the social housing, achieving top quartile performance 	
<p>Fit for Life, A Physical Activity Strategy for Brent, 2016-2021, Brent Council</p>	<p>This strategy follows on from the success of the 2010-2015 Health and Wellbeing Strategy and seeks that by “2021 more people in Brent will be more active and there will be improved health and wellbeing through the borough. This will be achieved by establishing physical activity as a fundamental and enjoyable part of people’s lives</p> <p>The Strategy has the following Objectives, which will, be achieved through carrying out the actions identified within the Action Plan included with Chapter 9 of the strategy:</p> <ol style="list-style-type: none"> 1. To increase participation in physical activity through the development of a core offer accessible to everyone 2. To develop sustainable and long term local community approaches to encouraging more people to adopt healthy lifestyles 3. To achieve permanent behaviour change by helping people to build physical activity into the fabric of their everyday lives 	<p>IIA objectives to promote health and wellbeing</p> <p>IIA objectives to reflect the need to address the cause of poor health and wellbeing.</p> <p>IIA to assess the health impacts that the policies and proposals contained within the emerging Local Plan will have on the current and future population of the borough.</p> <p>The Local Plan should promote health and well-being</p>

Appendix 3 - Habitat Regulation Assessment

1. Introduction

- 1.1 This report provides information in support of the Habitats Regulations Assessment (HRA) of the Preferred Options Brent Local Plan. The objective of the HRA is to establish whether the policies and proposals –either alone or in combination with other plans and projects – will have a likely significant effect on any site designated under European Law for its nature conservation interest. If the HRA establishes that this is the case, then an Appropriate Assessment (AA) will be required to ascertain whether or not the plan or project will have adverse impact on the integrity of site(s).
- 1.2 The HRA and Integrated Impact Assessment (IIA) have been conducted separately due to the assessment processes having different aims, emphasis and level of detail.

2. Background Information

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

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public'
- 2.2 The Habitats Directive provides for the legal protection of habitats and species of European Importance. An ecological network of sites is identified by the Directive and is known as 'Natura 2000'. The Natura 2000 network comprises of the following sites:
 - Special Protection Area (SPA) – a European designation which protects

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

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

2.4 The HRA is a multi-stage process. The different stages of the HRA, and progress made against these stages, are detailed in the below table.

Stage Name	Description of Stage	Progress Made
Stage 1 – Screening	The first stage established whether there is likely to be a significant effect, alone or in combination, as a result of the plan or project on one or more European sites. Where effects are unlikely, preparing a ‘finding of no significant effect’ report. If the screening determines that there is potential for likely significant effect then progress to Stage 2	Included within the Integrated Impact Assessment Scoping Report. Concluded that the Local Plan is not likely to have significant effects on the qualifying features and integrity of the identified European sites. However, recommended that the Council should carry out a further screening assessment following the completion of the Issues and Options stage to identify whether the preferred approach is likely to have a significant effect on the identified European Sites.
Stage 2 – Appropriate Assessment (AA)	The Appropriate Assessment (AA) is a more detailed assessment which has been designed to determine whether or not the plan, either alone or in combination with other plans will have an	-
Stage 3 – Assessment of Alternative Solutions	The third stage examines alternative ways of achieving the aims of the project or plan which avoids adverse impacts on the integrity of the European Sites	-
Stage 4 – Assessment of Imperative Reasons of Overriding Public Interest (IROPI) and compensatory measures	If adverse impacts remain then the plan may only proceed where ‘imperative reasons of overriding interest’ (IROPI) are established and compensatory measures are taken.	-

Table 25: HRA process

3 Methodology for the Screening Assessment

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

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

3.2 In addition to the above, the methodology for this assessment has drawn upon that used for the Appropriate Assessment of the Brent’s Core Strategy (2010) and Development Management Policies (2016).

3.3 The methodology used for this assessment is detailed in the below table.

Stage	Tasks
Stage 1 – Screening for possible adverse effects	<ul style="list-style-type: none"> • Identification of European sites which could be impacted by the implementation of the Local Plan and its policies
Stage 2 – Appropriate Assessment of Likely Adverse Effects	<ul style="list-style-type: none"> • Identification of qualifying features, key environmental conditions to support integrity, and weaknesses and threats for the identified European Sites • Identification of key elements of the Local Plan and adverse environmental impacts arising from its implementation • Identification of trends and future developments which could lead to an ‘in-combination’ adverse effect on the identified European Sites • Analysis on how the implementation of the Local Plan alone and ‘in-combination’ is likely to affect the identified European Sites including identification of cross-cutting adverse impacts • Analysis of cross-cutting impacts with an assessment of how significant the impact of development in Brent is likely to be. • Screening of individual Local Plan policies for effects/impacts on European Sites

Table 26: Methodology used for HRA assessment

4. Relevant European Sites (Screening)

4.1 No European Sites lie wholly or partially within Brent. However, there are several European sites within and around London, which are considered to be in close enough proximity to be potentially affect by development in the borough. This assessment has identified five European Sites as shown in the table below, which are within 15km of the borough's boundaries, which could be impacted by the implementation of the Brent Local Plan.

European Site	Conservation Status	Site Size (ha)	Distance from Brent
Richmond Park	Special Area of Conservation	846.43	8km
Wimbledon Common	Special Area of Conservation	351.3831	9km
Lee Valley	Special Protection Area	451.2962	11km
South West London Water Bodies	Special Protection Area	828.14	15km
Epping Forest	Special Area of Conservation	1,796.92	15km

Table 27: Screened European Sites

Site Descriptions

4.2 Information on the five European Sites, including their qualifying features, current condition and threats have been obtained from the following sources:

- Natural England Site Improvement Plans and Designated Sites View
- Natura 200 – Standard Data Forms
- Habitats Regulation Assessment Screening of the Core Strategy DPD (2011) and Development Management Policies DPD (2016)
- Draft Habitat Regulation Assessment for the emerging London Plan, GLA, 2017

Richmond Park

- 4.3 Richmond Park SAC is a parkland site which covers approximately 847ha. It has been managed as a royal deer park since the 17th century and continues to be managed as one of London's Royal Parks. The site has been identified as being significant due to its dry acid grassland and neutral unimproved grassland mosaic, extensive wooded areas and population of veteran trees. These habitats support a number of invertebrates and regionally uncommon plants, which includes Upright Chickweed (*Moenchia erecta*), Blinks (*Montia Fontana*) and Subterranean Clover (*Trifolium subterraneum*). Richmond Park is also at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, which is the qualifying species for this site.
- 4.4 Richmond Park is also designated as a National Nature Reserve (NNR) and a Site of Special Scientific Interest (SSSI).

Wimbledon Common

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

Lee Valley

- 4.7 The Lee Valley SPA contains a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats. Wintering populations of Bittern (*Botaurus stellaris*), Shoveler (*Anas clypeata*) and Gadwall (*Anas strepera*) visit the area as well as breeding birds which include the Kingfisher (*Alcedo atthis*), Little Ringed Plover (*Charadrius dubius*), Skylark (*Alauda arvensis*) and Yellow Wagtails. The SPA also supports nationally and regionally important numbers of Tufted Duck (*Aythya Fuligula*), Great Crested Grebe (*Podiceps cristatus*), Goosander (*Mergus merganser*) and Goldeneye (*Bucephala clangula*). There are a number of rare aquatic invertebrate present such a waterboatman, as well as many regional uncommon and rare wetland

plant species including River Water-drop-wort (*Oenanthe fluviatilis*), Tubular water-dropwort (*Oenanthe fistulosa*), Whorl-grass (*Catabrosa aquatic*), Arrowhead (*Sagittaria sagittifolia*), Flowering-rush (*Butomus umbellatus*) and Stream water-crowfoot (*Ranunculus penicillatus*). The Lee Valley supports a number of specially protected species including the Water Vole and Great Crested Newt. The area is also very popular for recreational activities and is designated a Regional Park. The Lee Valley Park Authority is responsible for managing the important balance between nature conservation and recreational activity on the site.

South West London Water Bodies (SWLWB)

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

Epping Forest

- 4.10 Epping Forest is an extensive ancient wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathlands and scattered wetland. The semi-natural woodland is particularly extensive but the forest plains are also a major feature and contain a variety of unimproved acid grasslands. Epping Forest represents Atlantic acidophilous beech forests in the north-eastern habitats of the UK's range. The site is also to important range of rare ephiphyttes, including the moss *Zygodon forsteri*. The woodland supports many bird species, including breeding Sparrow Hawk, Marsh Tit and Hawfinch. There have been widespread, and frequent records of stag beetle *Lucanus cervus* on this site.
- 4.11 The below table provides a summary of the qualifying features, conservation objectives, site sensitivities and threats of the identified European sites.

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
Richmond Park SAC	<i>Lucanus cervus</i> : Stag Beetle	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintain or restoring:</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and • The distribution of qualifying species within the site. 	100% of this site is an 'Unfavourable – Recovering' equivalent to 846.63 hectares	<ul style="list-style-type: none"> • Scrub encroachment • Development pressure • Human Disturbance • Atmospheric Pollution 	<ul style="list-style-type: none"> • No threats or pressures identified within the Natural England Site Improvement Plan. <p>Increased recreational pressure and urbanisation</p>
Wimbledon Common	Northern Atlantic wet heaths with <i>Erica tetralix</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its	333.77ha of the site is 'Unfavourable – Recovering' condition. This is equivalent to 94.99% of the site.	<ul style="list-style-type: none"> • Heavy recreational pressure • Spread of non-native/invasive species 	<ul style="list-style-type: none"> • Public Access/Disturbance • Habitat Fragmentation

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
	<p>European dry heaths</p> <p><i>Lucanus cervus</i>: Stag beetles</p> <p>The site qualifies as an SAC for the following Annex II species:</p> <ul style="list-style-type: none"> - Stag Beetles <i>Lucanus cervus</i> 	<p>Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and functions of habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The population of qualifying species, and, • The distribution of qualifying species within the site 	<p>17.62 ha of the site is in 'Unfavourable – No Change' condition. This is equivalent to 5.01% of the site.</p>	<ul style="list-style-type: none"> • Scrub encroachment • Atmospheric pollution 	<ul style="list-style-type: none"> • Invasive Species • Air Pollution: impact of atmospheric nitrogen deposition
Lee Valley SPA	<i>Botaurus stellaris</i> ; Great Bittern	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild	<p><u>Amwell Quarry SSSI</u></p> <ul style="list-style-type: none"> • 100% of site (37.08ha) in favourable condition <p><u>Rye Meads SSSI</u></p>	<ul style="list-style-type: none"> • Water quality • Water levels • Disturbance to bird feeding and 	<ul style="list-style-type: none"> • Water Pollution • Hydrological Changes

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
	<p><i>Anas strepera</i>; Gadwall</p> <p><i>Anas clypeata</i>; Northern Shoveler</p>	<p>Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> The extent and distribution of the habitats of the qualifying features The structure and function of the habitats of the qualifying features The supporting processes on which the habitats of the qualifying features rely The population of each of the qualifying features, and, The distribution of the qualifying features within the site. 	<ul style="list-style-type: none"> 39.95% of the site (24.08ha) is in 'favourable' condition, 60.05% (24.08ha) is in 'unfavourable – recovering' condition. <p><u>Turnford and Cheshunt Pits SSSI</u></p> <ul style="list-style-type: none"> 100% (174.41 ha) of the site is in 'favourable' condition <p><u>Walthamstow Reservoirs SSSI</u></p> <ul style="list-style-type: none"> 100% (179.51ha) of the site is in 'Unfavourable – Recovering' condition. 	<ul style="list-style-type: none"> roosting habitats (noise/visual) 	<ul style="list-style-type: none"> Public Access/Disturbance Inappropriate scrub control Fisheries: Fish stocking Invasive Species Inappropriate cutting/mowing Air Pollution: risk of atmospheric nitrogen deposition
South West London Water Bodies	<p><i>Anas clypeata</i>; Northern Shoveler</p> <p><i>Anas strepera</i>; Gadwall</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p>	<p><u>Kempton Park Reservoirs SSSI</u></p> <ul style="list-style-type: none"> 100% (25.29%) of the site is within 'Unfavourable – Recovering' condition. 	<ul style="list-style-type: none"> Water Quality – eutrophication is a threat, particularly from point source pollution but also from surface run-off or groundwater pollution and 	<ul style="list-style-type: none"> Public Access/Disturbance Changes in species distributions Invasive Species

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
		<ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and • The distribution of the qualifying features within the site 	<p><u>Knight and Bessborough Reservoirs SSSI</u></p> <ul style="list-style-type: none"> • 100% (63.43ha) of the site is in 'Favourable' condition <p><u>Staines Moor SSSI</u></p> <ul style="list-style-type: none"> • 96.16% (491.18ha) of the site is in 'Favourable' condition. • 2.13% (10.90ha) of the site is in 'Unfavourable – Recovering' condition. <p><u>Thorpe Park No. 1 Gravel Pit (SSS)</u></p> <ul style="list-style-type: none"> • 100% (42.53ha) of the site is in 'Favourable' condition <p><u>Wraysbury and Hythe End Gravel Pits SSSI</u></p> <ul style="list-style-type: none"> • 100% (117.21ha) 'Favourable' condition <p><u>Wraysbury No. 1 Gravel Pit SSSI</u></p> <ul style="list-style-type: none"> • 100% (57.96ha) in 'Favourable' condition 	<ul style="list-style-type: none"> • atmospheric deposition. • Water levels • Disturbance to bird feeding and roosting habitats (noise/visual) • Siltation • Scrub or tree encroachment • Spread of introduced non-native species • Recreational pressure/disturbance • Development pressure • Diffuse air pollution from traffic and agriculture 	<ul style="list-style-type: none"> • Natural changes to the site conditions • Fisheries: Fish stocking • Inappropriate weed control • Invasive Species • Inappropriate cutting/mowing • Air pollution: risk of atmospheric nitrogen deposition.

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
			<u>Wraysbury Reservoir SSSI</u> <ul style="list-style-type: none"> 100% (205.56ha) in 'Favourable' condition. 		
Epping Forest	<p>Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>Atlantic acidophilous beech forests with Ilex and sometimes also <i>Taxus</i> in the shrub layer</p> <p><i>Lucanus cervus</i>: Stag Beetle</p> <p>European dry heaths</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> The extent and distribution of qualifying natural habitats and habitats of qualifying species The structure and function (including typical species) of qualifying natural habitats The structure and function of habitats of qualifying species The supporting processes on which qualifying natural habitats and habitats of qualifying species rely The populations of qualifying species, and, 	<ul style="list-style-type: none"> 35.48% (643.31ha) of the site is in 'Favourable' condition. 48.17% (861.19ha) of the site is in 'Unfavourable – Recovering' condition. 14.53% (259.76ha) of the site is in 'Unfavourable – no change' condition. 1.83% (32.66ha) of the site is in 'Unfavourable – Declining' condition. 	<ul style="list-style-type: none"> Heavy recreational pressure Scrub encroachment Atmospheric pollution (nutrient deposition and acidification) Development pressure 	<ul style="list-style-type: none"> Air Pollution: impact of atmospheric nitrogen deposition Under grazing Public Access/Disturbance Changes in species distributions Inappropriate water levels Water Pollution Invasive Species to Wet Heathland with cross-leaved heath and Beech Forest on acid soils Disease

Site	Qualifying Features	Conservation Objectives	Current Condition	Site Sensitivities	Threats/Pressures
		<ul style="list-style-type: none"> The distribution of qualifying species within the site. 			

Table 28: Qualifying features, conservation objectives, site sensitivities and threats of identified European sites

5. The Brent Local Plan

5.1 The emerging Local Plan will contain a number of strategic and non-strategic policies that will form the development strategy of the borough to 2041. These policies will seek to address a number of issues, which include:

- Providing 2325 dwellings a year to 2029 to accord with Policy H1 of the new draft London Plan. Furthermore, the Brent Strategic Housing Market Assessment 2018 has identified a need for 42,000 homes between 2016-2041, which is equivalent to 1,680 dwellings;
- Supporting high population growth within the borough – it is predicted that the population of Brent will grow by 23.7% by 2050, from approximately 329,000 in 2016 to 407,000 in 2050;
- The emerging London Plan has identified Brent as a ‘provide capacity’ borough, which means that it needs to provide additional employment floorspace within the borough. There is also the desire for Brent to move to a higher wage economy to assist in tackling inequalities within the borough;
- Protecting and enhancing the borough’s open space, while seek to create new provision on major sites and within the identified growth areas;
- Addressing the impacts of climate change, such as the urban heat island effect and increased flood risk;
- Achieving the London Plan target of zero-carbon major development;
- Improving local air quality within the borough through ensuring all major development is air quality neutral, and where possible, air quality positive;
- Provision of adequate infrastructure to support both existing and new residents, businesses and visitors;
- Promoting sustainable and active travel within the borough to address the issue of road congestion; and
- Maintaining the vitality and viability of the borough’s town centres

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

- *Urbanisation - Increased urbanisation could entail greater noise, light, and air pollution. This could have an impact on migrating birds. Greater urbanisation could also lead to degradation in water quality.*
- *Recreational Pressure – Population growth within the borough could lead to increased visit to European sites with associated disturbance to flora and fauna impacts on supporting habitats due to recreational activities.*
- *Water Quality – Increased water use, depending on the source of the water and where it deposited could affect water levels and quality within the European sites.*
- *Atmospheric Pollution – Increased traffic as a result of the commercial and housing development within the borough could lead to an increase in air pollution. Furthermore, the population increase could result in additional cars on the borough's road network, which could lead to further emissions. This increase in air pollution could affect sensitive species.*

6. HRA Screening of Policies within the preferred option of the Brent Local Plan

6.1 Table 29 presents the screening assessment from for the policies contained within the 'Brent Local Plan'.

Policy Number	HRA screening
BP1 – Central	This policy sets out the development strategy for central Brent. Key elements of this policy include: provide at least an additional 15,000 new dwellings within the central area, intensify employment uses and providing additional retail floorspace. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BCGA1 – Wembley Growth Area	This policy sets out the development strategy for the Wembley Growth Area. Key elements of this policy include: development of 15,000 new homes, ensuring physical pedestrian and cycle route linkages from Wembley Triangle to Forty Lane / Bridge Road, and creation of recreational space. It is possible that the increase in population as a result of residential development within this growth area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP2 – East	This policy sets out the development strategy for East Brent. Key elements of this policy include: providing additional housing within two new Growth Area – Neasden Station and Staples Corner; encouraging intensification on local significant industrial sites and Staples Corner. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP3 – North	This policy sets out the development strategy for North Brent. Key elements of this policy include: providing additional housing within the extended Burnt Oak and Colindale Growth Area; redevelopment of the Morrison's site to maximise efficiency; co-location at Honeypot LSIS; supporting transformational change at Colindale LSIS; and reducing traffic dominance along the

Policy Number	HRA screening
	A5 corridor. This policy seeks to provide additional housing within the extended Burnt Oak and Colindale Growth Area, co-location at Honeypot LSIS, supporting transformational change at
BNGA1 – Burnt Oak / Colindale Growth Area	This policy sets out the development strategy for the Burnt Oak / Colindale Growth Area. Key elements of the policy include: delivery of 2000 new homes, improvements to the quality and accessibility of existing local open spaces, play areas within new developments, and improved cycle infrastructure along the A5. It is possible that the increase in population as a result of residential development within this growth area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP4 – North West	This policy sets out the development strategy for North West Brent. Key elements of this policy are: the provision of an additional 2,600 new homes at the newly established Northwick Park Growth Area; encouraging intensification at East Lane Businesses Park. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP5 – South	This policy sets out the development strategy for South Brent. Key elements of this policy are: delivering additional homes within the extended Church End Growth Area; co-locating employment and residential at Church End LSIS; encouraging intensification at Brentfield LSIS; reducing flood risk at Brent River Park; and creating strong walking and cycling links with the surrounding areas. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BSGA1 – Church End Growth Area	This policy sets out the development strategy for the Church End Growth Area. Key elements of this policy include: delivery of 1040 homes, new space to serve as an employment, community and health hub, and a new 6 form of entry secondary school and college. It is possible that the increase in population as a result of residential development within this growth area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that

Policy Number	HRA screening
	this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP6 South East	This policy sets out the development strategy for the South East Brent. Key elements of this policy include: delivering 2,800 new homes within the South Kilburn Growth Area; redevelopment of Kilburn Square; creating new open space within the South Kilburn Growth Area; and reducing traffic dominance along the A5 corridor. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BSEGA1 – South Kilburn Growth Area	This policy sets out the development strategy for the South Kilburn Growth Area. Key elements of this policy include: delivery of approximately 3400 new homes, provision of a new health centre, and additional public open space. It is possible that the increase in population as a result of residential development within this growth area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BP7 – South West	This policy sets out the development strategy for South West Brent. Key elements of this policy include: continuing residential-led mixed-use development within Wembley and Alperton Growth Areas; encouraging the intensification of existing SIL and LSIS around Alperton; enhancing and maintaining Barham Park; reducing car parking standards within the Alperton Housing Zone. It is possible that the increase in population as a result of residential development within this area could lead to an increase in recreational visits at the identified European Sites. However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.
BSWGA1 – Alperton Growth Area	This policy sets out the development strategy for the Alperton Growth Area. Key elements of this policy include: over 6000 additional homes and new business and employment floorspace, such including studios and managed workspaces for local businesses, creative industries, and artists to reinvigorate the local economy. It is possible that the increase in population as a result of

Policy Number	HRA screening
	<p>residential development within this growth area could lead to an increase in recreational visits at the identified European Sites.</p> <p>However, it is considered that this policy will have a very limited impact on the identified European sites due to their distance from the borough and that Brent has a number of open spaces which can be visited.</p>
BD1 – Leading the way in Good Urban Design	It is considered that this policy will have no HRA implications. This is a development management policy which sets out the standards that need to be achieved in relation to good urban design and architectural quality.
BD2 – Tall Buildings in Brent	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the standards that need to be achieved in relation to tall buildings.
BD3 – Basement Development	It is considered that this policy will have no HRA implications. This is a development management policy which sets the standards for basement development within Brent.
BH1 – Increasing Housing Supply in Brent	This policy sets out how housing supply within Brent will be increased to provide additional homes to 2041. It is possible that the increase in population, which is supported by the increase in the borough’s housing supply, could lead to an increase in recreational visits to the identified European sites. However, due to the borough’s distance from the European Sites, it is considered that this policy will have a very limited impact.
BH2 – Priority Areas for Additional Housing Provision within Brent	It is considered that this policy will have no HRA implications. This policy identifies priority areas where the provision of additional homes will be supported.
BH3 – Build to Rent	It is considered that this policy will have no HRA implications. This is a development management policy that sets the requirement for Build to Rent properties to be provided on sites that provide 500 dwellings or more, unless certain criteria is met.
BH4 – Small Sites and Small Housing Developments in Brent	As identified within the emerging London Plan, small housing sites and small housing developments are to form a significant portion of the borough’s housing supply. It is possible that the increase in population, which will be supported by achieving the small sites target, can lead to an increase in recreational visits to the identified European site. However, due to the borough’s distance from the European Sites, it is considered that this policy will have a very limited impact.

Policy Number	HRA screening
BH5 – Affordable Housing	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the affordable housing tenure split required to comply with the fast track approach for viability for residential developments of 10 or more dwellings.
BH6 – Housing Size Mix	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the Council's preferred housing mix for residential developments within the borough.
BH7 – Accommodation with Shared Facilities for Additional Support	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the criteria – both for their creation and for their loss – of accommodation with shared facilities or additional support.
BH8 – Specialist Older Persons Housing	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure sufficient provision of specialist older persons housing in the borough, which will support achieving the London Plan annual benchmark of 230 dwellings per annum.
BH9 – Gypsy and Traveller Accommodation	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure
BH10 – Resisting Housing Loss	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the exceptional circumstances that must be met for the Council to support the loss
BH11 – Conversion of Family Sized Dwellings	It is considered that this policy will have no HRA implications. This is a development management policy that sets out to protect family size housing within the borough.
BH12 – Residential Outbuildings	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure that new out buildings do not provide residential accommodation, or do not support increased occupation of a dwelling.
BH13 – Residential Amenity Space	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the residential amenity space standards that are to be met by developments within the borough.
BSI1 – Social Infrastructure and Community Facilities	It is considered that this policy will have no HRA implications. This policy seeks to protect existing social infrastructure within the borough, and sets out the requirements for new or enhanced social infrastructure facilities.

Policy Number	HRA screening
Policy BE1 – Economic Growth and Employment Opportunities for all	It is considered that this policy will have no HRA implications. This policy seeks the protection of educational quarters at Northwick Park and Wembley and a minimum of 10% of new employment space on major developments in Alperton, Burnt Oak Colindale, Church End, Neasden, Staples Corner and Wembley Growth Areas exceeding 3,000 sqm to be affordable workspace in the B use class. The quantum of employment space delivered as a result of implementing this policy is not considered to have a detrimental impact on the identified European sites.
Policy BE2 – Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)	It is considered that this policy will have no HRA implications. This policy seeks to intensify industrial uses within particular locations within the borough. No quantum of development has been identified within this policy. However, intensification of employment sites is likely to result in the creation of additional jobs within the borough. This could lead to additional recreational demand from workers. Due to the location of SIL and LSIS within the borough, it is considered that any impacts of the identified European sites will be very limited.
Policy BE3 – Local Employment Sites and Work-Live	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect local employment sites from being inappropriately released for non-employment uses.
Policy BE4 – Supporting Strong Centres	It is considered that this policy will have no HRA implications. This policy seeks to ensure that the town centres within the borough are strengthened, and are not detrimentally impacted by retail development outside of town centre boundaries.
Policy BE5 – Protecting Retail in Town Centres, Betting Shops, Adult Gaming Centres and Pawnbrokers	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to restrict the amount of betting shops, adult gaming centres and pawnbrokers within the borough's town centres. It also sets out the conditions for the introduction of new takeaways and shisha cafes within the borough.
Policy BE6 – Neighbourhood Parades and Isolated Shop Units	It is considered that this policy will have no HRA implications. This is a development management policy that seek to protect retail and services uses within Neighbourhood Parades.
Policy BE7 – Shop Front Design and Forecourt Trading	It is considered that this policy will have no HRA implications. This is a development management policy that requires shop front design and forecourt to be of high quality that complements the building and adjoining properties.

Policy Number	HRA screening
Policy BE8 – Markets and Car Boot Sales	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect markets within the borough, and requires planning permission for new markets and car boot sales to be subject to an agreed Management Plan.
Policy BE9 – Visitor Accommodation and Attractions	It is considered that this policy will have no HRA implications. This is a development management policy that identifies the priority locations for hotel provision within the borough, and sets out the criteria that is to be met, in addition to the sequential test for hotels in town centres.
Policy BHC1 – Brent’s Heritage Assets	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect the borough’s heritage assets, and details how the Council will assess the impact that development may on these assets.
Policy BHC2 – National Stadium Wembley	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect the National Stadium Wembley, and its functions as a renowned location for sport and cultural events from inappropriate development.
Policy BHC3 – Supporting Brent’s Culture and Creative Industries	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure that creative industries are supported through the development of improved and additional creative workspaces, cultural facilities and other mutually complementary uses.
Policy BHC4 – Brent’s Night Time Economy	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure that Brent’s night time economy (in particular the centres of Kilburn High Road, Cricklewood, Wembley Park and Wembley) are the priority locations for such uses.
Policy BHC5 – Public Houses	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure that the loss of public houses will only be supported in certain circumstances.
Policy BG11 – Green and Blue Infrastructure in Brent	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect and enhance the borough’s green and blue infrastructure, biodiversity and geo-diversity. Furthermore, it places a requirement on major developments to incorporate publically accessible open space. It is possible that through the enhancement of the borough’s open spaces, biodiversity and geo-diversity, and the provision of new spaces, residents may not feel the need to travel to the European sites.

Policy Number	HRA screening
Policy BG12 - Trees and Woodlands	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to protect the borough's existing tree stock.
Policy BSUI1 – Creating a Resilient and Efficient Brent	<p>This policy seeks to: establish new district Combined Heat and Power networks at new Growth Areas within the borough; requires new development within specific growth areas to connect or contribute towards a decentralised energy system; requires all major development to submit a sustainability statement and all major non-residential development to achieve BREEAM standard of 'Excellent'.</p> <p>It is considered that this policy will have no HRA implications. This is a development management policy that seeks to improve the efficiency of Brent, and its resilience against the impacts of climate change</p>
Policy BSUI2 - Air Quality	It is considered that this policy will have no HRA implications. This policy seeks to improve local air quality through requiring all major developments to achieve at least Air Quality Neutral with developments in Growth Areas and Air Quality Focus Areas to achieve Air Quality Positive. Improving air quality within Brent can lead to a reduction in emissions, such as carbon dioxide and nitrogen oxides, which in conjunction with the implementation of the policies and proposals contained within the Mayor's Environment Strategy and the draft London Plan, could have a positive impact on the atmospheric pollution levels at the identified European Sites.
Policy BSUI3 – Managing Flood Risk	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to minimise flood risk within the borough.
BSUI4 – On Site Water Management and Surface Water Attenuation	It is considered that this policy will have no HRA implications. This is a development management policy that seeks to ensure development does not impact on the current drainage system, and that appropriate sustainable drainage measures are in place to control surface water-run off. As demonstrated in the IIA matrices for BSUI4, the implementation of this policy can protect the quality and/or enhance the quality of water within the borough.
BT1 – Sustainable Travel Choice	It is considered that this policy will have no HRA implications. This policy seeks to promote active travel and sustainable travel within the borough. The promotion of such methods could lead to a decrease in congestion, and the amount of emissions that transport emit into the atmosphere. In conjunction with the implementation of the Mayor's Environment Strategy and the draft London Plan, this could have a positive impact on the atmospheric pollution levels at the identified European Sites.

Policy Number	HRA screening
BT2 – Parking and Car Free Development	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the car parking standards for development within the borough, and details how the impact of parking will be managed.
BT3 – Freight and Servicing	It is considered that this policy will have no HRA implications. This policy encourages freight delivery to adopt more sustainable modes of travel and sets the standards for the provision of serving facilities within all development. The promotion of such methods could lead to a decrease in congestion, and the amount of emissions that transport emit into the atmosphere. In conjunction with the implementation of the Mayor’s Environment Strategy and the draft London Plan, this could have a positive impact on the atmospheric pollution levels at the identified European Sites.
BT4 – Forming an access on to a road	It is considered that this policy will have no HRA implications. This is a development management policy that sets out the conditions that are to be met for the creation of an access to a highway.

Table 29: Screening assessment for the policies contained within the Brent Local Plan

7. Pathways of Impact

7.1 It is considered that there are three ways in which the implementation of the Brent Local Plan can impact the European Sites. These impacts are discussed in more detail below.

Urbanisation and Recreational Pressure

7.2 The identified European sites have a range of habitats and have proven to be a popular recreational resource. As identified in Table 28, the conservation value of 4 out of the 5 sites are at risk from recreational pressure. The recreational use of a European site can have the potential to cause the following:

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

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

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

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

Effects of the Brent Local Plan on the identified European Sites

7.5 The Brent Local Plan includes policies that seek to accommodate significant housing growth – which includes achieving the 2325 dwellings per annum to 2028/29 – and employment growth. Such significant growth could possibly lead to increased visits from Brent residents and workers to the identified European sites.

- 7.6 Although the European Sites identified above provide a number of recreational activities, it is considered unlikely that Brent residents and workers will visit the identified sites on a frequent basis due to the following reasons:
- None of the sites are adjacent to Brent or within north-west London, with all sites being over half an hour drive from the centre of the borough
 - There are a number of open spaces within the borough, such as Fryent County Park and Welsh Harp, which can be accessed easier for Brent residents and workers than the European Sites. In line with London Plan policy and emerging Brent Local Plan policy, these open spaces will continue to be protected, and where possible, enhanced. Furthermore, there are several major green spaces in neighbouring boroughs, such as Hyde Park, Regents Park, Horsenden Hill and Hampstead Heath, that Brent residents and workers can easily access.
 - Some of the recreational activities offered at the European sites can be accessed within the borough and/or neighbouring boroughs. For example, both Lee Valley Regional Park and SWWLWB are popular sites for angling and water sports. However, Welsh Harp offers water-based activities within North West London which are comparable to those at Lee Valley and SWLWB.
- 7.7 Furthermore, the threats of recreational pressure and urbanisation at the identified European Sites are addressed and mitigated through local management plans. For example, the Richmond Park Management Strategy seeks to ensure the intensity of any particular recreation activities does not conflict with the landscape or ecological qualities of the park and the Lee Valley Regional Park Authority prepared a 'Water Management Strategy' in the late 1990s which sets out an approach to how competing demands of recreation and biodiversity will be met, and has continued to influence policies and proposals that come forward within the Regional Park.

Water Quality and Water Levels

- 7.8 Lee Valley Spa and SWLWB are the only two European sites which have been identified as being sensitive to water quality and vulnerable to changes in water levels.
- 7.9 Poor water quality can have a number of impacts on the identified European sites, which includes:
- Eutrophication – the over enrichment of water nutrients. This can lead to hypoxia (oxygen depletion) and harmful algal blooms which can destroy the aquatic life of the affected area.⁴⁰
 - Detrimental impact on the landscape in regards to smell and aesthetics.

⁴⁰ World Resources Institute: <http://www.wri.org/our-work/project/eutrophication-and-hypoxia/about-eutrophication>

- Microbial pollutants (i.e. those from sewerage) could lead to infectious diseases which could ingest the aquatic life and terrestrial life through drinking water.
 - Reduced amounts of sunlight penetrating the water as a result of suspended particles. This could disrupt the growth of photosynthetic plants and micro-organisms, which would impact on the aquatic community that they support.
- 7.10 Diffuse source pollution is primarily managed locally through waste water treatment. The Brent Local Plan draft policy BSUI4 seeks to ensure that developments have sufficient on-site water attenuation methods.
- 7.11 Water scarcity and water quality levels is a London-wide issue, with all water companies that serve London being located in areas that are classified as 'seriously water-stressed'. Housing growth and the increasing number of 1 person households have led to an increasing domestic demand for water. As identified in the draft London Plan, Londoners consumer on average 149 litres of water per day – which is 8 litres above the national average. With the predicted population growth, it is likely that the abstraction rate will increase to support the growing population, which will have a detrimental impact on water levels.

The Effects of the Brent Local Plan

Water Levels

- 7.12 Like a number of authorities within London, Brent draws its water from the wider Thames River Basin – an area encompassing the River Thames, its tributaries and groundwater supply. In regards to water scarcity, in line with Policy SI5 of the draft London Plan, all major development proposals within Brent are to achieve mains water consumptions of 105 litres or less per head per day. The implementation of the London Plan policy within Brent, and across all London boroughs, should assist in addressing the issue of water scarcity and maintaining water levels.
- 7.13 Furthermore, it should be noted that the draft London Plan HRA found that due to significant investment that Thames Water has placed in its water supply infrastructure to make it as resilient as possible, and no intention to use the top level of any of the reservoirs in the South West London Water Bodies (as indicated in the draft Thames Water Resource Management Plan 201-2040), there is not likely to be a significant effect on the European sites through this impact pathway.

Water Quality

- 7.14 As identified above, poor water quality is likely to have a significant effect on the Lee Valley Spa and SWLWB. However, it is considered that the implementation of the plans and proposals within the Brent Local Plan will not have an impact on water quality within the two aforementioned sites for the following reasons:

- The Brent Local Plan (Policy BGI1) requires development in the vicinity of the borough's blue ribbon network enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive and Thames River Basin Water Management Plan
- The Brent Local Plan (BSUI4) requires all major development proposals, and where feasible, minor developments to incorporate sustainable drainage measures. The inclusion of such measures on scheme can help protect water quality within the borough through ensuring through reducing sediment and contaminants from runoff.

Air Quality

7.15 The three main pollutants of concern to the identified European Sites are:

- Sulphur Dioxide (SO₂) – the output of these emissions is from power stations and industrial processes that require the combustion of coal and oil
- Ammonia (NH₃) – the output of these emissions is dominated by agricultural processes, with some chemical processes.
- Oxides of Nitrogen -- the output of this pollutant is dominated by vehicle exhausts

7.16 Epping Forest is particularly vulnerable to air pollution, with the decline in epiphytes in the area largely attributed to air pollution. The major contributor of air pollution in this area is vehicle emissions.

7.17 Air quality is a London-wide problem, with a number of national targets for nitrogen dioxide, ozone and particulate matters levels being exceeded. A regional response to improving air quality has been created, and is incorporated within a number of documents, which includes the Mayor's Environment Strategy and the Mayor's Transport Strategy.

The effects of the Brent Local Plan

7.18 In order to address poor air quality within the borough, the Council has prepared an Air Quality Action Plan (2017-2022). This plan details that actions that the Council will undertake over the next five years and how the Council will act to reduce the pollution from transport, construction and local industry. The Brent Local Plan supports the aims of the Brent Air Quality Action Plan, and seeks to ensure that all major development is at least air quality neutral, with development in Growth Areas and Air Quality Focus areas being air quality positive.

7.19 The implementation of Brent's Air Quality Action Plan, in conjunction with the London-wide initiatives, may see improvements in air quality. Such improvements is likely to have positive impacts on the identified European Sites.

8. Possible in-combination effects

- 8.1 There is a requirement to consider the 'in-combinations' effects of the Brent Local Plan. To assist in establishing whether there is likely to be 'in-combination effects', this section of the HRA details existing and/or future regional trends and developments within neighbouring boroughs.
- 8.2 The emerging London Plan, the emerging Integrated Impact Assessment and Mayor's Strategies identified a number of issues within the London region which are likely to have detrimental environmental impacts if not addressed. In addition, trends relating to climate change are also likely to have significant impacts for biodiversity, which could affect the integrity of European sites. Relevant London trends include:
- London has seen significant population growth, with current population projections estimating that the population of the city will increase by 70,000 a year, reaching 10.8 million in 2041.
 - It is likely that the intensification of development within London to accommodate the growing population will lead to an increase in the urban heat island (UHI) effect and further increase the risk of overheating.
 - London's streets are some of the most congested in the world. Lifestyle changes, increased use of internet deliveries, Sunday shopping and the rapidly growing night-time economy has caused changes in travel and congestion patterns in recent years.
 - Employment is expected to increase on average by 49,000 jobs each year, reaching 6.9 million by 2041.
 - Approximately 800,000 people commute into London for work. This is anticipated to increase to 1 million by 2041.
 - It is anticipated that there will be a significant increase in the amount of trips made by Londoners; from 20 million to 25 million per day between 2011 and 2041.
 - London's air quality is poor. There are high levels of NO_x, PM₁₀, PM_{2.5} emissions from road transport, with it predicted that there will be little or no reduction in PM₁₀ and PM_{2.5} between 2013-2030 from this source. London is also not compliant with legal limit values for NO₂. Furthermore, CO₂ emissions from buildings continue to rise.
 - London will always have some degree of flood risk. However, with climate change the probability of flooding is increasing. Furthermore, London is also at particular risk from surface water flooding, which is mainly due to its large extent of impermeable surfaces.
 - In addition to increased risk of flooding, current and anticipated effects of climate change in London are: hotter summer, more intense rainfall, more frequent and intense heatwaves, changes in seasonality of rainfall, increased urban heat island effect and sea level rise.
 - The dry nature of the south east, coupled within high population densities within London, means that water resources are currently under significant pressure. The growth anticipated within London will further exacerbate this pressure. In addition, London has one of the highest rates of water use within the country and one of the highest rates of leakage

from the water supply distribution network. The London Plan IIA also identified that if there are two consecutive dry winters, London will be at risk of drought conditions and water supply restrictions.

- Domestic gardens comprise approximately 38,000 ha, or 24%, of the land area of London. It is estimated that approximately 60% of these gardens are actually green, as a number of now have extensive areas of car parking, decking or paving. It is possible that a further decline in the land area that is comprise of domestic could occur if a proactive approach to the intensification of suburbs to increase housing delivery is adopted.

8.3 The new draft London Plan (Intend to Publish version) contains a large housing target for a ten-year period (2019/2029). During this ten-year period, an additional 522,870 dwellings are to be provided, which is equivalent to 52,287 dwellings per annum. This is a reduction from the previous draft London Plan, which proposed a target of 64,935 dwellings per annum. The housing target for Brent, and its neighbouring boroughs, are detailed in Table 30 below.

Borough	Draft London Plan Target (Intend to Publish - 2019)	
	Total Ten Year Capacity	Annualised
Barnet	23,640	2,364
Brent	23,250	2,325
Camden	10,380	1,038
Harrow	8,020	802
Ealing	21,570	2,157
Hammersmith and Fulham	16,090	1,609
Kensington and Chelsea	4,480	448
City of Westminster	9,980	998
OPDC	13,670	1,367

Table 30: Housing Target for Brent and Neighbouring Boroughs

8.4 It is considered that the greatest scope for in-combination effect on the identified European sites is through the delivery of additional housing and employment land.

8.5 As shown in Table 31 below, the HRA's of Brent's neighbouring authorities concluded that no likely significant effect to the qualifying features of the European site will occur as a result of implementing their Plan

Local Planning Authority	Development Plan Document	Identified European Sites	Conclusion
Barnet	Core Strategy	Lee Valley, Epping Forest, Richmond Park, Wimbledon Common, Wormley-Hoddesdon Park Works (SAC)	Concluded that the implementation of the Core Strategy will have no likely significant effect on the integrity of the Natura 2000 sites.
	Draft Local Plan 2020	Lee Valley, Richmond Park, Epping Forest, Wimbledon Common	Concluded the draft Local Plan would not have any significant effects (alone or in combination) on any designated European Sites
Camden	Local Plan (2017)	Epping Forest, Lee Valley, Richmond Park, Wimbledon Common	Concluded that the Plan policies are unlikely to have significant effects on the sites of European Importance for habitats or species, or an adverse impact on the integrity of these sites.
Harrow	Core Strategy (2012)	Richmond Park, Wimbledon Common, Lee Valley, South West London Waterbodies'	Concluded that the implementation of the Core Strategy would not have an adverse impact on the integrity of any European Site.
	Area Action Plan, Site Allocations and Development Management Policies (2012)		Concluded that the three documents would not have an adverse impact on the integrity of any European site.
Ealing	Core Strategy (2012) HRA also used for Management, Sites and Policy Map	South West London Waterbodies, Richmond Park, Wimbledon Common	Concluded that the DPD documents would not result in impacts on the identified European Sites, and were not likely to have an adverse effect on their conservation objectives/integrity.

Local Planning Authority	Development Plan Document	Identified European Sites	Conclusion
	Development Plan Documents		
Hammersmith and Fulham	Local Plan (2018)	Richmond Park	Concluded that Richmond Park would not be significant adversely impacted upon by any of the policies in the Local Plan.
Kensington and Chelsea	Local Plan (2019)	Richmond Park, Wimbledon Common,	Concluded that the draft Local Plan will not have a significant/any effect on the relevant Natura 2000 sites.
City of Westminster	Local Plan (2016)	Wimbledon Common, Richmond Park, Epping Forest, Essex Estuaries, Thames Estuary and Marshes, Lee Valley	Concluded that the changes would not change the conclusions set out in the Appropriate Assessment for the Core Strategy, which was: <i>“It is not considered that Westminster is situated close enough to any of the designated European sites for there to arise direct and obvious detrimental effects on them as a result of the policies and proposals put forward for implementation in the Core Strategy”.</i>
	Draft City Plan (2019)	Wimbledon Common, Richmond Park, Lee Valley, Epping Forest, Thames Estuary and Marshes	No significant impacts on any European
OPDC	Draft Local Plan	Richmond Park, Wimbledon Common, Lee Valley, South	Concluded that the OPDC Local Plan is unlikely to have any significant effects on the identified

Local Planning Authority	Development Plan Document	Identified European Sites	Conclusion
		West London Water Bodies, Epping Forest	European Sites, either alone or in combination with other plans or projects.

Table 31 HRAs of neighbouring authorities

8.6 Furthermore, the draft HRA for the new London Plan concluded that “*there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without a likely significant effect on European sites, either alone or in combination with other plans and projects*’. The HRA recommended amendments to policies, or matters of directions to boroughs – none of which impacted upon Brent.

9. Assessment Outcome

- 9.1 This HRA screening report identified five European Sites that are within 15km of Brent. None of the screen European Sites are within, or adjacent to the borough. The policies and site allocations contained within draft Brent Local Plan were screened. As shown in Table 29, it was found that no policies would have HRA implications.
- 9.2 The report identified that there were five potential impact pathways in which development in Brent could impact on the identified European sites. These pathways are: urbanisation, recreational pressure, water levels, water quality and air quality. It is considered that the distance between Brent and the identified European Sites means that none of the aforementioned pathways would have a direct significant effect on the sites.
- 9.3 The policies and proposals within the Brent Local Plan have also been assessed in-combination with trends and development within London to identify whether any adverse impacts on the European sites would arise.
- 9.4 The conclusion of this assessment is that the policies and proposals contained within the emerging Brent Local Plan **is not likely to have significant effects on the qualifying features and integrity of the identified European sites**. The emerging Local Plan includes policies that seek the enhancement of the borough's open spaces, biodiversity and water quality, improvements to air quality and promotes water efficiency. Therefore, a comprehensive Appropriate Assessment is not considered to be necessary.