**Brent Local Plan Strategic Policy Assessment**

1. **Introduction**

1.1 The National Planning Policy Framework (NPPF) (paragraph 21) requires local planning authorities to make explicit which policies are strategic policies in their Plan.

1.2 The Council has used the criteria provided in the NPPF (Strategic Policies paragraph 20/21/22/23) to assess the policies and site allocations contained within the draft Brent Local Plan.

1.3 Table 1 shows an overview of Strategic and Non-Strategic policies.

1.4 The assessment criteria and its conclusions are shown in Table 2.

1. **Assessment Methodology**

2.1 The criteria contained in NPPF is as follows:

* Para 20. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

a) Housing (including affordable housing), employment, retail, leisure and other commercial development;

b) Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) Community facilities (such as health, education and cultural infrastructure); and

d) Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

* Para 21. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed.
* Para 23. ... Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area…
  1. Where a policy was considered to meet at least one of these criteria, it was determined to be a Strategic Policy.
  2. Table 2 shows detailed assessment. In conclusion, the following policies are considered non-strategic:

**BD3** Basement development

**Policy BH12** Residential Outbuildings

**Policy BH13** Residential Amenity Space

**Policy BE5** Protecting Retail in Town Centres, Betting Shops, Adult Gaming Centres and Pawnbrokers

**Policy BE6** Neighbourhood Parades and Isolated Shop Units

**Policy BE7** Shop Front Design and Forecourt Trading

**Policy BE8** Markets and Car Boot Sales

**Policy BT4** Forming an Access on to a Road

**Table 1 SUMMARY TABLE (TO BE ADDED IN APPENDIX 6 OF LOCAL PLAN)**

| **STRATEGIC POLICIES** | **NON-STRATEGIC POLICIES** |
| --- | --- |
| **-** | 4. DEVELOPMENT VISION AND GOOD GROWTH IN BRENT  **DMP1** Development Management General Policy |
| Chapter 5 ALL PLACE POLICIES:  **BP1,BP2,BP3,BP4,BP5,BP6,BP7** | **-** |
| Chapter 5 ALL GROWTH AREA POLICIES:  **BCGA1, BEGA1, BEGA2, BNGA1, BNWGA1, BNWSA1, BSGA1, BSEGA1, BSWGA1** | **-** |
| CHAPTER 5 ALL SITE ALLOCATION POLICIES:  Central Place: **BCSA1-BCSA20**  East Place: **BESA1-BESA3**  North Place: **BNSA1-BNSA8**  North West Place: **BNWSA1**  South Place: **BSSA1-BSSA19**  South East Place: **BSESA1-BSESA35**  South West Place: **BSWSA1-BSWSA17** | **-** |
| CHAPTER 6.1 DESIGN:  **BD1** Leading the Way in Good Urban Design  **BD2** Tall Buildings in Brent | **BD3** Basement development |
| CHAPTER 6.2 HOUSING:  **Policy BH1** Increasing Housing Supply in Brent  **Policy BH2** Priority Areas for Additional Housing Provision within Brent  **Policy BH3** Build to Rent  **Policy BH4** Small Sites and Small Housing Developments in Brent  **Policy BH5** Affordable Housing  **Policy BH6** Housing Size Mix  **Policy BH7** Accommodation with Shared Facilities or Additional Support  **Policy BH8** Specialist Older Persons Housing  **Policy BH9** Gypsy and Traveller Accommodation  **Policy BH10** Resisting Housing Loss  **Policy BH11** Conversion of Family Sized Dwellings | **Policy BH12** Residential Outbuildings  **Policy BH13** Residential Amenity Space |
| CHAPTER 6.3 SOCIAL INFRASTRUCTURE:  **BSI1** Social Infrastructure and Community Facilities | **-** |
| CHAPTER 6.4 ECONOMY AND TOWN CENTRES:  **Policy BE1** Economic Growth and Employment Opportunities for all  **Policy BE2** Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)  **Policy BE3** Local Employment Sites and Work-Live  **Policy BE4** Supporting Strong Centres  **Policy BE9** Visitor Accommodation and Attractions | **Policy BE5** Protecting Retail in Town Centres, Betting Shops, Adult Gaming Centres and Pawnbrokers  **Policy BE6** Neighbourhood Parades and Isolated Shop Units  **Policy BE7** Shop Front Design and Forecourt Trading  **Policy BE8** Markets and Car Boot Sales |
| CHAPTER 6.5 HERITAGE AND CULTURE:  **Policy BHC1** Brent’s Heritage Assets  **Policy BHC2** National Stadium Wembley  **Policy BHC3** Supporting Brent’s Culture and Creative Industries  **Policy BHC4** Brent’s Night Time Economy  **Policy BHC5** Public Houses | **-** |
| CHAPTER 6.6 GREEN INFRASTRUCTURE  **Policy BGI1** Green and Blue Infrastructure in Brent  **Policy BGI2** Trees and Woodlands | **-** |
| CHAPTER 6.7 SUSTAINABLE INFRASTRUCTURE  **Policy BSUI1** Creating a Resilient and Efficient Brent  **Policy BSUI2** Air Quality  **Policy BSUI3** Managing Flood Risk  **Policy BSUI4** On-site Water Management and Surface Water Attenuation | **-** |
| CHAPTER 6.8 TRANSPORT  **Policy BT1** Sustainable Travel Choice  **Policy BT2** Parking and Car Free Development  **Policy BT3** Freight and Servicing, Provision and Protection of Freight Facilities | **Policy BT4** Forming an Access on to a Road |

**Table 2: Assessment of the Draft Brent Local Plan policies against the Strategic Policy Criteria in the NPPF.**

| **NPPF CRITERIA** | **Housing (including affordable housing), employment, retail, leisure and other commercial development** | **Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)** | **Community facilities (such as health, education and cultural infrastructure);** | **Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.** | **Any relevant cross-boundary issues** | **Planning for and allocating sufficient sites to deliver the strategic priorities of the area** | **CONCLUSION** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| DEVELOPMENT VISION AND GOOD GROWTH IN BRENT | | | | | | | |
| DMP1 Development Management General Policy |  |  |  |  |  |  | Non-Strategic |
| ALL PLACE POLICIES | | | | | | | |
| BP1,BP2,BP3,BP4,BP5,BP6,BP7 |  |  |  |  |  |  | Strategic |
| ALL GROWTH AREA POLICIES | | | | | | | |
| BCGA1, BEGA1, BEGA2, BNGA1, BNWGA1, BNWSA1, BSGA1, BSEGA1, BSWGA1 |  |  |  |  |  |  | Strategic |
| ALL SITE ALLOCATION POLICIES | | | | | | | |
| Central Place: BCSA1-BCSA20  East Place: BESA1-BESA3  North Place: BNSA1-BNSA8  North West Place: BNWSA1  South Place: BSSA1-BSSA19  South East Place: BSESA1-BSESA35  South West Place: BSWSA1-BSWSA17 |  |  |  |  |  |  | Strategic |
| DESIGN | | | | | | | |
| BD1 Leading the Way in Good Urban Design |  |  |  |  |  |  | Strategic |
| BD2 Tall Buildings in Brent |  |  |  |  |  |  | Strategic |
| BD3 Basement development |  |  |  |  |  |  | Non-Strategic |
| HOUSING | | | | | | | |
| Policy BH1 Increasing Housing Supply in Brent |  |  |  |  |  |  | Strategic |
| Policy BH2 Priority Areas for Additional Housing Provision within Brent |  |  |  |  |  |  | Strategic |
| Policy BH3 Build to Rent |  |  |  |  |  |  | Strategic |
| Policy BH4 Small Sites and Small Housing Developments in Brent |  |  |  |  |  |  | Strategic |
| Policy BH5 Affordable Housing |  |  |  |  |  |  | Strategic |
| Policy BH6 Housing Size Mix |  |  |  |  |  |  | Strategic |
| Policy BH7 Accommodation with Shared Facilities or Additional Support |  |  |  |  |  |  | Strategic |
| Policy BH8 Specialist Older Persons Housing |  |  |  |  |  |  | Strategic |
| Policy BH9 Gypsy and Traveller Accommodation |  |  |  |  |  |  | Strategic |
| Policy BH10 Resisting Housing Loss |  |  |  |  |  |  | Strategic |
| Policy BH11 Conversion of Family Sized Dwellings |  |  |  |  |  |  | Strategic |
| Policy BH12 Residential Outbuildings |  |  |  |  |  |  | Non-Strategic |
| Policy BH13 Residential Amenity Space |  |  |  |  |  |  | Non-Strategic |
| SOCIAL INFRASTRUCTURE | | | | | | | |
| BSI1 Social Infrastructure and Community Facilities |  |  |  |  |  |  | Strategic |
| ECONOMY AND TOWN CENTRES | | | | | | | |
| Policy BE1 Economic Growth and Employment Opportunities for all |  |  |  |  |  |  | Strategic |
| Policy BE2 Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) |  |  |  |  |  |  | Strategic |
| Policy BE3 Local Employment Sites and Work-Live |  |  |  |  |  |  | Strategic |
| Policy BE4 Supporting Strong Centres |  |  |  |  |  |  | Strategic |
| Policy BE5 Protecting Retail in Town Centres, Betting Shops, Adult Gaming Centres and Pawnbrokers |  |  |  |  |  |  | Non-strategic |
| Policy BE6 Neighbourhood Parades and Isolated Shop Units |  |  |  |  |  |  | Non-strategic |
| Policy BE7 Shop Front Design and Forecourt Trading |  |  |  |  |  |  | Non-strategic |
| Policy BE8 Markets and Car Boot Sales |  |  |  |  |  |  | Non-strategic |
| Policy BE9 Visitor Accommodation and Attractions |  |  |  |  |  |  | Strategic |
| HERITAGE AND CULTURE | | | | | | | |
| Policy BHC1 Brent’s Heritage Assets |  |  |  |  |  |  | Strategic |
| Policy BHC2 National Stadium Wembley |  |  |  |  |  |  | Strategic |
| Policy BHC3 Supporting Brent’s Culture and Creative Industries |  |  |  |  |  |  | Strategic |
| Policy BHC4 Brent’s Night Time Economy |  |  |  |  |  |  | Strategic |
| Policy BHC5 Public Houses |  |  |  |  |  |  | Strategic |
| GREEN INFRASTRUCTURE | | | | | | | |
| Policy BGI1 Green and Blue Infrastructure in Brent |  |  |  |  |  |  | Strategic |
| Policy BGI2 Trees and Woodlands |  |  |  |  |  |  | Strategic |
| SUSTAINABLE INFRASTRUCTURE | | | | | | | |
| Policy BSUI1 Creating a Resilient and Efficient Brent |  |  |  |  |  |  | Strategic |
| Policy BSUI2 Air Quality |  |  |  |  |  |  | Strategic |
| Policy BSUI3 Managing Flood Risk |  |  |  |  |  |  | Strategic |
| Policy BSUI4 On-site Water Management and Surface Water Attenuation |  |  |  |  |  |  | Strategic |
| TRANSPORT | | | | | | | |
| Policy BT1 Sustainable Travel Choice |  |  |  |  |  |  | Strategic |
| Policy BT2 Parking and Car Free Development |  |  |  |  |  |  | Strategic |
| Policy BT3 Freight and Servicing, Provision and Protection of Freight Facilities |  |  |  |  |  |  | Strategic |
| Policy BT4 Forming an Access on to a Road |  |  |  |  |  |  | Non-Strategic |