

Soundness Self Assessment

Brentford Area Action Plan

June 2007

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TEST 1: The DPD has been prepared in accordance with the Local Development Scheme

Is the DPD identified in the authority's Local Development Scheme (LDS)?	Local Development Scheme (LDS)	The Hounslow LDS as amended April 2007 identifies the BAAP as a priority in preparation of the Borough's Local Development Framework.
Milestones recorded in AMR.	<p>LDS March 2005</p> <p>LDS April 2006</p> <p>LDS April 2007</p> <p>Annual Monitoring Report (AMR) 2004/05 2005/06</p>	<p>Updates on progress in achieving the milestones in the LDS have been provided in the Annual Monitoring Reports 2004/05 and 2005/06.</p> <p>The milestones for the BAAP have been altered in the two amendments made to the LDS since its adoption in March 2005. The first amendment in April 2006 saw the milestone for submission change from June 2006 to December 2006.</p> <p>The second amendment in April 2007 was also to the date for submission from December 2006 to June 2007. Both these amendments resulted in changes to the dates following submission (Pre-examination meeting, Examination and Adoption). The reasons for the amendments are outlined in reports that went to the Council's Executive Committee in April 2006 and February 2007.</p> <p>The Annual Monitoring Report 2004/05 submitted to the Secretary of State in December 2005 summarised progress to date including Issues consultation in August/ September 2005 and Issues and Options in June/July 2005. The subsequent AMR 2005/06 submitted to the Secretary of State in December 2006 reported that the BAAP had been prepared in accordance with the amended LDS (April 2006).</p>
Have any details set out in the LDS such as the role, rationale or scope of the DPD been met?	LDS April 2007	The Local Development Scheme (Amended April 2007) sets out in Appendix 1 an overview of the proposed BAAP, Timetable and arrangements for production. In providing an overview, the LDS outlines the role and subject of the DPD – 'to address site-specific redevelopment opportunities identified by development industry partners, stakeholders and the community. The plan will address issues relating to public transport, traffic management, town centre shops & services, waterside improvements, urban design, employment, open space, community and social provision, residential areas and affordable housing plus planning obligations'. The BAAP achieves this through presenting a framework of spatial and development site policies to guide the future.

	LDS April 2007	<p>Continued from above planning of the BAAP area.</p> <p>The proposed reporting and decision making procedure has been met as follows:</p> <p>Stage 1 Issues and Options – Cllr Chatt, Executive Member authorised publication and information consultation on broad options (including sustainability appraisals of all options) in May 2005. Area Monitoring Committees were consulted in September 2005 following the consultation period in June/ July 2005. This was due to the agendas for area committees being full or no meetings being scheduled in June/ July/ August 2005. However, all Members were sent a copy of the Options questionnaire and background paper at the beginning of the consultation period in June/ July 2005 (Refer to Statement of Compliance for more detail).</p> <p>Stage 2 Preferred Options – Responses to the Issues and Options consultations and draft Preferred Options document were reported to the Council's Executive committee on the 3rd January 2006 for approval for embark upon formal consultation.</p> <p>The Area Monitoring Committees were consulted during the consultation period (January / February 2006) in accordance with the LDS (Refer to Statement of Compliance for more detail).</p> <p>Stage 3 Submission Responses to the Preferred Options and Draft BAAP for submission were reported to the Council's Executive Committee on the 1st May 2007 including Cllr Reid, Lead Member for Environment and Planning.</p> <p>A report followed to full Council (Borough Council) on the 26th June for approval to submit the BAAP to the Secretary of State.</p> <p>Whilst the submission of the BAAP is in July 2007, the delay is not considered to be significant or necessitates an immediate review of the LDS.</p>
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TEST 2: The DPD has been prepared in compliance with the Statement of Community Involvement

Refer to Statement of Compliance, which sets out how the Brentford Area Action Plan has been prepared in accordance with the Council's Statement of Community Involvement, adopted 26th September 2006. The Statement of Compliance forms a key part of the 'pre-submission consultation statement' prepared in accordance Regulation 28(c) of the Town and Country Planning (Local Development) (England) Regulations 2004.

TEST 3: The Plan has been subjected to a Sustainability Appraisal

Activity	Evidence	Comments/ Actions
PRE-PRODUCTION		
Baseline information being collected and evidence being gathered to set the framework for the SA	SA Scoping Report (September 2005) Employment Development Plan SA Report (January 2006)	The <i>SA Scoping Report</i> (September 2005) presents the baseline and issues in preparation of the framework. The baseline and issues identified from the baseline was updated in the <i>Brentford Area Action Plan Sustainability Appraisal Report</i> (January 2006). This has ensured an up to date baseline from which to monitor future impacts of the BAAP against sustainability objectives
Are you collecting information on the conservation objections of any European Wildlife sites	Tables 2, 3a and 3b of Screening Report on Draft Submission AAP	Baseline information has been collected in the preparation of the screening report through liaison with Natural England and CIP and this is presented in Sections 5 and 6.
Have you consulted the 4 statutory environment consultation bodies for 5 weeks on the scope and level of detail of the environmental information to be included in the SA Report	SA Scoping Report (September 2005) Letter dated 27 th May 2005 sent to 4 SEA consultation bodies Schedule of representations received through consultation on SA Scoping Report Employment Development Plan SA Report (January 2006)	The <i>SA Scoping Report</i> was sent to the 4 SEA consultation bodies including the Countryside Agency, English Heritage, English Nature, and Environment Agency on the 27 th May 2005. Representations were received from all 4 agencies as well as the Government Office for London and GLA. The schedule of representations summarises how comments were incorporated into the <i>SA Scoping Report</i> adopted by the Council's Executive on 13 th September 2005. This is included as Appendix 1 to the SA Report accompanying the preferred options for the BAAP.
ISSUES AND OPTIONS		
Did the issues and options consultation contribute to the development and sustainability appraisal of the preferred options	Interim SA report	Yes. As stated in the introduction to the <i>Brentford Area Action Plan Sustainability Appraisal Assessment of Options (June 2005)</i> the process is iterative with options being refined following public consultation and taking account of the findings of the Sustainability Appraisal.

Making the SA implications of options explicit	Brentford Area Action Plan Sustainability Appraisal Assessment of Options (June 2005)	The <i>Brentford Area Action Plan Sustainability Appraisal Assessment of Options (June 2005)</i> presented an assessment of the options for their impacts against the 23 sustainability objectives set out in the SA Scoping Report.
Are you developing a framework for monitoring the effects of the DPD	SA Scoping Report (September 2005) Brentford Area Action Plan Sustainability Report (January 2006)	The <i>SA Scoping Report (September 2005)</i> presented indicators for monitoring the impacts on sustainability objectives, which were developed further in the Sustainability Appraisal of preferred options (refer to section 6.2 of the <i>Brentford Area Action Plan Sustainability Appraisal Report (Jan 2006)</i>).
PREFERRED OPTIONS		
Have you undertaken a sustainability appraisal of the preferred options and prepared a draft SA Report for consultation?	Brentford Area Action Plan SA Report (January 2006)	A sustainability appraisal of the preferred options was undertaken and consulted on from the 25 th January to the 7 th March 2006.
Have you undertaken the necessary sustainability appraisal of alternatives in arriving at the preferred options?	Brentford Area Action Plan SA Report (January 2006)	In the sustainability appraisal of preferred options, an assessment was made of alternatives to the preferred options against the sustainability objectives including a “status quo” option of retaining existing policies in the Unitary Development Plan (2003) and a ‘Do nothing’ option of relying on national and regional guidance (without a local policy framework in place) – refer to Section 6.1 and Appendix 3 of SA report on BAAP preferred Options (Jan 2006).
Have you screened the plan options for likely significant effects on European Sites for birds?		A screening report on whether an appropriate assessment is required was not undertaken until preparation of the submission version following which the AAP was amended accordingly to reflect the recommendations of the screening report. The preferred options consultation (Jan – Mar 2007) was a short time before Local Authorities were advised by letter dated 9th March 2007 of the application of requirements for an Appropriate Assessment under Article 6(3) and (4) of the Habitats Directive 92/43/EEC to Development Plans. Up until receipt of the letter from the then Office for the Deputy Prime Minister, the Council were not aware of the need to undertake a screening report to determine whether an appropriate assessment was required.

SUBMISSION		
Have you reviewed and amended the sustainability appraisal report to reflect the submission DPD?	Reg 28(1) Brentford Area Action Plan SA Report (July 2007)	An appraisal of the submission objectives and policies was undertaken to determine whether a further SA was required. Although the objectives and policies are shown to be a refinement of preferred options and the links are clearly shown within the SA, it was considered necessary to reappraise the submission objectives and policies to take into account changes in the baseline due to additional information on retail need, flood risk and transport capacity.
Have you amended the screening and Appropriate Assessment where need to take any account of changes since Reg 26 participation	Reg 27(3) Brentford Area Action Plan SA Report (July 2007)	The screening of the BAAP has been undertaken in preparation of the AAP. Following preparation of the draft screening report, which was sent to Natural England for comments, the draft AAP was amended to reflect the recommendations.
Have you considered how the plan will be implemented and set out how it is to be monitored?	Brentford Area Action Plan SA Report (July 2007)	Each policy is supported by reasoned justification and mechanisms for implementation. Indicators are also set out for monitoring the effectiveness of the policy in implementation. Within the SA report significant effects of the BAAP on sustainability objectives are also identified to monitor the impacts of the BAAP on the economy, society and the environment.

TEST 4: It is a spatial plan which is consistent with national planning policy and in general conformity with the Spatial Development Strategy for London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or adjoining areas.

Test 4A: It is a spatial plan which has regard to other relevant plans, policies and strategies?

Activity	Evidence	Comments/ Actions
<p>Does the DPD reflect guidance on spatial planning which is set out in national planning policy?</p>	<p>BAAP Spatial Portrait and Issues, and Key Diagram</p> <p>Vision and Objectives</p> <p>Policy context</p> <p>Policies BAAP1 to BAAP7 Implementation</p>	<p>Provides a summary of key economic, social and environmental issues in the BAAP area. These include sustainable development, the quality of the built environment, the value of the area's waterways, the strategic role of the Great West road as a gateway to and from London and the regeneration Brentford town centre.</p> <p>The AAP contains a vision and objectives to guide development in Brentford until 2018. These go beyond physical regeneration to include sustained economic success, the role of its water related activities and the provision of social and communities facilities.</p> <p>This section identifies national and regional guidance, and local strategies including the Community Plan and the Local Area Agreement with which the AAP accords.</p> <p>An implementation section follows each policy outlining any additional means of implementation when a policy cannot be delivered solely or mainly through the granting of planning permission. It identifies how the implementation of the relevant aims and objectives from other strategies e.g. the Community Plan, the Local Implementation Plan, the Local Area Agreement and LB Hounslow's Air Quality Management Plan, will help to deliver the AAP's own objectives.</p>

	<p>Monitoring</p> <p>Statement of Compliance</p>	<p>Each policy in the Area Action Plan includes a section to monitor its implementation.</p> <p>The Statement of Compliance sets out how the BAAP has been prepared in accordance with the Council's Statement of Community Involvement, to gain stakeholder input on the future development of Brentford.</p>
<p>Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land premises, which should be prepared in parallel.</p>	<p>Statement of Compliance</p> <p>Schedule of Representations</p> <p>BAAP Policies BAAP1 – BAAP7</p>	<p>Sets out how the consultation bodies identified in Appendix 2 of the Statement of Community involvement have been consulted. The list of consultation bodies includes all service providers.</p> <p>Sets out the Council's response to consultation at the preferred options stage. Summarises the issues raised through consultation and how the Council has taken these into account. This schedule includes responses from bodies responsible for other strategies affecting the BAAP area including Thames Water, the Highways Agency, Port of London Authority, Metropolitan Police Authority, Transport for London and Brentford Football Club. Other service providers consulted outside of the formal process include the Local Education Authority, the Primary Care Trust (including a Health Impact Assessment for Brentford) and Scottish and Southern Electric.</p> <p>Identify the relationship with other requirements including water supply and infrastructure (Thames Water), Commerce Road Bus Garage (Transport for London), water freight (British Waterways), and the proposed World Heritage Site buffer zone (Royal Botanic Gardens, Kew).</p>
<p>Is it clear how the DPD relates to other plans and strategies such as local transport plans which will influence the delivery of policies and proposals within the plan?</p>	<p>Schedule of Representations</p> <p>BAAP Policy context</p>	<p>Sets out the Council's response to consultation at the preferred options stage. Summarises the issues raised through consultation and how the Council has taken these into account. This schedule includes all responses from bodies responsible for other strategies affecting the Borough.</p> <p>Sets out relevant objectives of other local plans and strategies that will be implemented through the BAAP</p>

	Policies BAAP1 to BAAP7 Implementation	The implementation section after each policy identifies where other local plans and strategies will assist in the implementation of the vision, policies and objectives within the BAAP.
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PART 4B: It is consistent with national planning policy		
Activity	Evidence	Comments/ Actions
Does the DPD contain any policies or proposals which are not consistent with national planning policy and, if so, is there a local justification?	<p>BAAP</p> <p>Brentford Area Action Plan Sustainability Appraisal Strategic Flood Risk Assessment (SFRA)</p>	<p>The DPD is considered to be in general conformity with national planning guidance.</p> <p>Hounslow's SFRA shows that part of Development Site M8 is located within flood zones 3a and 3b. Where it is not possible, consistent with other sustainable development objectives to direct development to areas of lower probability of flooding, PPS25 states that the exception test can be applied. The Council has demonstrated that development site M8 meets exception tests a) and b) in Appendix E of the Brentford Area Action Plan Sustainability Appraisal. Development site policy M8 sets out the requirement for developers to carry out an FRA in accordance with test c)</p>

PART 4C: The plan is in general conformity with the London Plan

Activity	Evidence	Comments/ Actions
<p>Does the DPD contain any policies and proposals which are not in general conformity with the London Plan? If so, is there a local justification?</p>	<p>Representation from the Mayor of London on the preferred options</p> <p>Schedule of Representations</p> <p>Sustainability Appraisal (Section 6.2)</p> <p>BAAP: Introduction</p> <p>Policy Context</p> <p>Policies BAAP1 to BAAP7 Implementation</p>	<p>Comments received from the Mayor of London on the preferred options did not raise any issues of conformity with the London Plan.</p> <p>The schedule of representations demonstrates how the Mayor's comments on the preferred options have been addressed.</p> <p>The Sustainability Appraisal shows that the policies are refinement of the preferred options and that there have been no significant changes between the two stages.</p> <p>Section 1.7 of the introduction explains that BAAP will have formal development plan status together with the 'saved' UDP policies (or Core Strategy) and the London Plan.</p> <p>A summary of relevant guidance from the London Plan is given in the Policy Context section of the DPD.</p> <p>Paragraph 4.17 makes specific reference to the London Plan as part of the statutory development plan for the area.</p> <p>Contains text stating that each policy should be read in conjunction with the policies in the London Plan.</p>

TEST 5: It has had regard to the authority's community strategy

Activity	Evidence	Comments/ Actions
<p>Does the DPD have regard to the Community Strategy, by setting out policies and proposals which deliver key components of that strategy so far as they are consistent with or in general conformity with high-level planning policy and relate to the use and development of land.</p>	<p>BAAP: Policy Context - paragraphs 4.35-4.47</p> <p>Policies BAAP1 to BAAP7 Development site policies</p>	<p>The policy context of the BAAP sets out the relevant themes and objectives/ strategies from the Community Plan that will be implemented through the BAAP.</p> <p>The policies in the BAAP also deliver the objectives in the Community Plan. From issues (August 2004) and options (June 2005) through to preferred options (January 2006), the Council has sought to implement the <i>Community Plan 2004 - 2007</i>, adopted in 2004. On the 26th June 2007, the Borough Council approved the <i>Community Plan 2007 - 2010</i>.</p> <p>Working with the Corporate policy section of the Council in preparation of the BAAP, the themes and objectives of the new Community Plan have been incorporated into the submission version of the Brentford Area Action Plan. The following assessment therefore considers how regard has been had in the Employment Development Plan Document to the Community Plan 2007 - 2010.</p>

Community Plan	How community plan is delivered through the Employment DPD
GROWING COMMUNITY - OBJECTIVES	
To ensure our new spatial plans for Hounslow achieve sustainable development of the borough by balancing economic and social growth needs with the protection and enhancement of the environment.	<p>The vision and objectives of the BAAP is to deliver the sustainable regeneration of Brentford.</p> <p>All the policies and proposals in the BAAP have been subject to a sustainability appraisal that has assessed the likely impact of the plan's policies on a set of environmental, social and economic objectives. Policies were adjusted depending on their likely impacts. Where negative effects were identified, measures to mitigate against these have been suggested.</p>
To ensure that the new developments contribute to meeting current and future needs but complement the surrounding area.	The plan's vision and objectives of the plan is to promote regeneration that provides for and responds to the needs of a growing community. The policies of the Draft BAAP deliver these objectives.
To work with developers to provide new homes of a high quality design and with high sustainable standards of construction, for families and key workers to buy, to rent and for shared ownership	Policies BAAP1 Sustainable Development and BAAP2 Urban Design respond to the distinctive environmental and historical characteristics of Brentford to ensure that high quality, sustainable development that responds to its local context is delivered.
To achieve a shift in the balance of housing towards family sized dwellings rather than more one and two bedroom flats, with the aim that 35% of new dwellings are 3-bedroom houses or larger	Proposal sites that include a residential element seek to achieve a mix of sized units appropriate to the characteristics and location of the site.
To ensure that new housing provision is supported by adequate physical infrastructure, including roads, public transport, water and sewage systems and also accompanied by the necessary social, health, educational and community facilities as well as retail and business areas to build sustainable communities	Policy BAAP1 sets out criteria that will be taken into account when considering new planning applications. The policy makes specific reference to the provision of services, facilities and infrastructure to meet the needs generated by development. Policy BAAP 7 details the necessary improvements to transport services to support the proposed growth.
To ensure the full and active involvement of all of the community in our development plans for the borough and in deciding on individual proposals	The BAAP has been prepared in accordance with the Statement of Community Involvement to ensure the full and active involvement of relevant stakeholders. The Statement of Compliance accompanying the Soundness Self Assessment outlines the engagement and consultation undertaken and how this accords with the SCI

CLEANER AND GREENER COMMUNITY	
Reduce pollution by tackling traffic congestion and emissions (air pollution, noise and greenhouse gas)	<p>Through the Sustainability Appraisal of the preferred options and draft BAAP, the vision, objectives and policies have been prepared to ensure the effects on air quality, noise and climate change are minimised.</p> <p>Policy BAAP1 Sustainable Development sets out criteria that will be taken into account when considering all new development. This includes the provision of onsite renewable energy to reduce carbon emissions, requirements in relation to the Code for Sustainable Homes and for potentially polluting applications. This represents a more stringent policy approach than the existing policies in the UDP and is justified by Brentfords specific location, circumstances and pressures.</p> <p>Policy BAAP4 The Great West Road. Criteria that will be taken into account for all new development include contributions to sustainable access and movement and overall reduction in pollution levels.</p> <p>Policy BAAP7 Sustainable Access requires developments that promote sustainable movement and restrain the use of the car that will contribute to reducing traffic congestion.</p>
Encourage sustainable low carbon energy production	Policy BAAP1 requires all new development to show how they will reduce Carbon Dioxide emissions by at least 20% from on site renewable energy generation.
Prevent further expansion at Heathrow unless this can be carried out without further damage to the environment	Outside the scope of the BAAP. To be addressed in preparation of the Core Strategy.
Protect and enhance the borough's parks, public open spaces, waterways and biodiversity	<p>Vision and objectives</p> <p>Policy BAAP2 seeks environmental and landscape improvements to public open spaces including waterside areas, the built heritage of the area, waterside areas and the Great West Road.</p> <p>Policy BAAP3 Regeneration of Brentford Town Centre makes high quality design that reflects its local context a key requirement of town centre redevelopment.</p> <p>Policy BAAP5 seeks to encourage the regeneration of Brentford's waterside for those uses that have interdependence with the water, offer access and support greater uses of the waterways for recreation and education uses.</p>

Understand, adapt to and mitigate the effects of climate change	<p>Through the Sustainability Appraisal of the preferred options and BAAP, the vision, objectives and policies have been prepared to ensure the effects on climate change are minimised.</p> <p>Policy BAAP1 requires all new major developments to minimise CO2 emissions through the provision off on site renewable energy and sustainable design and construction.</p> <p>Policy BAAP7 seeks to promote sustainable modes of transport and reduce reliance on the private car to help minimise CO2 emissions.</p>
Reduce the amount of waste we send to landfill by increasing the use of recycling and composting services and by introducing opportunities to recycle a wider range of materials	Outside the scope of the BAAP. To be addressed in preparation of the Core Strategy and Waste Development Plan Document.
Improve the condition of the streets, including improving street lighting, highways and footways, tackling litter, abandoned vehicles, graffiti and other environmental crimes	Policy BAAP2 seeks improvements to the street scene within the BAAP area through good design and planning obligations. The Development site policies provide more detailed guidance on potential improvements to the street scene where relevant.

SAFER STRONGER COMMUNITY	
We will work in partnership with the local community to develop safer neighbourhoods through the reduction of anti-social behaviour, crime and the fear of crime	Policy BAAP2 promotes the principles of high quality urban design which includes creating streets and spaces that are overlooked to allow natural surveillance.
Safer stronger communities to ensure people from all backgrounds respect each other and feel safe where they live	Policy BAAP6 protects large scale existing arts, cultural, entertainment and leisure facilities which provide safe places for community interaction. It is hoped the regeneration of the Town Centre will help to create a stronger sense of place and therefore belonging to Brentford.
To reduce the harm caused by drugs and alcohol	Outside the scope of the BAAP.
We will realise the potential of young people and support them to make informed decisions about their actions	Development site policy M8 seeks the provision of a new youth facility within Brentford town centre in accordance with Hounslow's Children and Young Peoples Plan 2007-2010.
To reassure communities, helping them to understand one another and feel safe and comfortable in the environment they live in	Policy BAAP2 promotes the principles of high quality urban design, which includes creating streets, and spaces that are overlooked to allow natural surveillance. The process of producing the plan has brought the community together to consider its future.

HEALTHY AND CARING COMMUNITY	
To tackle health inequalities by ensuring all aspects of community life (leisure, transport, housing, education, employment) contribute to the health and wellbeing of local residents, especially those at greatest risk.	Policy BAAP1 requires an infrastructure assessment, including a health impact assessment to consider the service implications of new development. In implementing the policy the Council will engage in regular formal discussions with Hounslow Primary Care Trust about planning applications to ensure that the health care needs of the community area being met. Planning contributions towards health service will be sought where required. Town Centre regeneration will also encourage more sustainable travel. The greater access and improvements to the river should also encourage walking.
To invest in prevention, early intervention and self care - raising public awareness of warning signs and providing information to enable people to take action to prevent serious illness (such as stroke, diabetes, mental illness, cancer, sexually transmitted infections and TB)	Outside the scope of the BAAP.
To develop high quality services and facilities for people with disabilities or mental illness, involving users, carers and the wider community as partners in planning, monitoring and delivering care	Outside the scope of the BAAP.
To promote the quality of life for older residents by supporting them to live as active citizens that can contribute and participate in social, economic, cultural, spiritual and civic affairs.	An objective of the plan is to provide a range of community, education, health, cultural, sport and entertainment facilities that will support Brentford's growing community, particularly young and old people. This is covered by BAAP1 and contributions from the Proposal sites.
To improve access to health and social care services across the borough – with the right services, in the right place, at the right time (more community and less hospital based care)	Policy BAAP1 seeks to ensure that health services continue to meet needs of Brentford's growing community.
To promote independence and healthy lifestyles through information, choice, direct control and the well located facilities	Policy BAAP1 seeks to ensure that health services continue to meet needs of Brentford's growing community.
CREATIVE COMMUNITY	
Enhance Parks and Open Spaces to promote community safety, relaxation, active lifestyles, learning and free enjoyment for all	Policy BAAP2 seeks environmental and landscape improvements to Brentford public open spaces within the BAAP area through good design and planning obligations. The Development site policies provide more detailed guidance on potential improvements to the street scene where relevant.
Promote arts, culture, libraries and play as a force for creativity, learning, fun and well being	Policy BAAP6 protects large scale existing arts, cultural, entertainment and leisure facilities and seeks their enhancement as part of any major redevelopment proposals.
Enhance Leisure and Community Sports provision in order to promote health and well being in the community	Policy BAAP6 protects large scale existing leisure facilities.

	An objective of the plan is to continue to support the relocation of Brentford Football club by delivering a new sports stadium and community hub. This will be considered further in the emerging Core Strategy
Maintain and promote the borough's cultural heritage and tourism potential	<p>Policy BAAP3 encourages the provision of a cultural centre/quarter that provides for a diverse range of cultural, social and community uses within Brentford town centre.</p> <p>Policy BAAP5 supports the regeneration and protection of Brentford's river and canal facilities and infrastructure which form part of the area's heritage.</p> <p>Policy BAAP6 protects large scale existing arts, cultural, entertainment and leisure facilities.</p>
Work to ensure the borough benefits from the 2012 Olympics and Paralympics	Outside the scope of the BAAP
A CHILDREN AND YOUNG PEOPLE'S COMMUNITY	
Improve the health and well-being of children and young people by promoting active and healthy lifestyle choices and providing support.	<p>Policy BAAP6 protects large scale existing arts, cultural, entertainment and leisure facilities.</p> <p>Development site policy M8 seeks the provision of a new youth facility within Brentford town centre in accordance with Hounslow's Children and Young Peoples Plan 2007-2010.</p>
Safeguard children and young people and improve the life chances of Looked After Children.	Outside the scope of the BAAP.
Maximise the opportunities for all children and young people to do well in their education and to achieve personal and social development by developing better places to go and things to do that they enjoy	<p>An objective of the plan is to provide a range of community, education, health, cultural, sport and entertainment facilities that will support Brentford's growing community, particularly young and old people.</p> <p>Policy BAAP3 encourages the provision of a cultural centre/quarter that provides for a diverse range of cultural, social and community uses within Brentford town centre.</p> <p>A sufficient planned increase in primary education provision is proposed to cope with the proposed increase in population. This is to be delivered in locations both inside and just outside the BAAP area. Consideration will be given to the need for additional secondary school provision within the emerging Core Strategy.</p> <p>Development site policy M8 requires the provision of a new youth facility</p>

	within Brentford town centre in accordance with Hounslow's Children and Young Peoples Plan 2007-2010.
Engage children and young people in decision-making and participation within the community and ensure that they become responsible citizens	In consultation on the BAAP the Council has specifically sought to engage young people through a visit to a local school, sending consultation material to all local primary and secondary schools, publishing a youth questionnaire on the Hounslow Youth Service website and consulting Hounslow Youth Council.
Promote the economic well-being of families whilst assisting young people to move successfully into adult life.	An overarching objective of the plan is to promote the sustainable regeneration of Brentford by delivering new development that meets the social needs of a growing community.

ECONOMICALLY ACTIVE AND SKILLED COMMUNITY	
To complete the regeneration of Hounslow Town Centre and Brentford	<p>An objective of the plan is regenerate Brentford town centre as a vibrant district centre.</p> <p>Policy BAAP3 sets out the criteria that will be taken into account for new development within Brentford town centre</p> <p>Development site policies M7-Somerfield and M8-'Brentford Waterside' are within Brentford town centre. The delivery of proposals on these sites is key to the generation of the town centre.</p>
Increase skills attainment particularly at "NVQ level 3" by encouraging more young people into further education and apprenticeships and reducing the number of 16-18 year olds	Outside the scope of the BAAP
Increase the number of borough residents in paid work	Delivering the regeneration of Brentford town centre through policy BAAP3 and development site policies M7 and M8 will increase the number of local job opportunities.
Support local business growth and development, promoting the borough to attract investment and development	<p>Policy BAAP seeks to ensure the regeneration of Brentford town centre as a vibrant district centre, which will attract new investment into the local area.</p> <p>Policy BAAP4 ensures that new development will promote the strategic economic role of the Great West Road.</p> <p>Policy BAAP5 supports the expansion of Brentford's waterspace employment cluster, and other water-dependant industries.</p>

TEST 6: The strategies/policies/allocation in the plan are coherent and consistent within and between DPD prepared by the authority, where cross boundary issues are relevant.

Activity	Evidence	Comments/ Actions																														
Do the policies clearly relate to the objectives in the submitted DPD or a related DPD	BAAP	<p>The policies in the DPD clearly relate back to the Objectives and support the delivery of those objectives. The links between objectives and policies is shown as follows:</p> <table border="1" data-bbox="1115 475 1865 799"> <thead> <tr> <th>Objective</th> <th>BAAP policy</th> <th>Development Site Policy</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1, 4, 7</td> <td>ALL</td> </tr> <tr> <td>2</td> <td>1</td> <td>ALL</td> </tr> <tr> <td>3</td> <td>1, 3, 6</td> <td>ALL</td> </tr> <tr> <td>4</td> <td>2, 3, 4</td> <td>ALL</td> </tr> <tr> <td>5</td> <td>5</td> <td>M3, M8 and RR1</td> </tr> <tr> <td>6</td> <td>2, 3, 5</td> <td>M7 and M8</td> </tr> <tr> <td>7</td> <td>1, 7</td> <td>ALL</td> </tr> <tr> <td>8</td> <td>1, 2, 4</td> <td>BE1 and BE4</td> </tr> <tr> <td>9</td> <td>6</td> <td></td> </tr> </tbody> </table> <p>Some of the policies are implemented in part through and read in conjunction with policies in the Employment DPD. The relevant policies in the Employment DPD are identified in the Implementation section that immediately follows each BAAP policy.</p> <p>The two documents – BAAP and Employment DPD have been prepared in parallel with consultation on options, preferred options and the submission, taking place concurrently.</p> <p>The ‘Introduction’ (paragraphs 1.1 – 1.12) in the BAAP explains the relationship the BAAP has with the currently adopted Unitary Development Plan and emerging Local Development Documents forming part of the Local Development Framework.</p> <p>The BAAP replaces the policies in the current UDP identified in Appendix 1 of the BAAP. The vision and objectives in the BAAP are considered to be consistent with the UDP principles and remaining objectives, which are set out in paragraphs 4.49 to 4.52 of the BAAP.</p>	Objective	BAAP policy	Development Site Policy	1	1, 4, 7	ALL	2	1	ALL	3	1, 3, 6	ALL	4	2, 3, 4	ALL	5	5	M3, M8 and RR1	6	2, 3, 5	M7 and M8	7	1, 7	ALL	8	1, 2, 4	BE1 and BE4	9	6	
Objective	BAAP policy	Development Site Policy																														
1	1, 4, 7	ALL																														
2	1	ALL																														
3	1, 3, 6	ALL																														
4	2, 3, 4	ALL																														
5	5	M3, M8 and RR1																														
6	2, 3, 5	M7 and M8																														
7	1, 7	ALL																														
8	1, 2, 4	BE1 and BE4																														
9	6																															

<p>Are the policy objectives within the DPD themselves consistent?</p>		<p>The objectives of the BAAP should be read in conjunction with each other. The objectives are considered to be consistent which the following matrix seeks to demonstrate:</p> <table border="1" data-bbox="1115 411 1570 890"> <tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td></td><td>1</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>1</td><td></td><td>2</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>2</td><td>+</td><td></td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>3</td><td>+</td><td>+</td><td></td><td>4</td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>4</td><td>0</td><td>+</td><td>0</td><td></td><td>5</td><td></td><td></td><td></td><td></td></tr> <tr><td>5</td><td>0</td><td>+</td><td>0</td><td>+</td><td></td><td>6</td><td></td><td></td><td></td></tr> <tr><td>6</td><td>0</td><td>+</td><td>+</td><td>+</td><td>+</td><td></td><td>7</td><td></td><td></td></tr> <tr><td>7</td><td>+</td><td>0</td><td>0</td><td>0</td><td></td><td>+</td><td>0</td><td></td><td>8</td></tr> <tr><td>8</td><td>+</td><td>+</td><td>+</td><td>+</td><td>0</td><td>0</td><td>+</td><td></td><td>9</td></tr> <tr><td>9</td><td>+</td><td>+</td><td>+</td><td>0</td><td>0</td><td>0</td><td>+</td><td>0</td><td></td></tr> </table> <p>Impact + Positive - Negative 0 Neutral</p> <p>Objectives 1. To promote the sustainable development and regeneration of Brentford 2. To promote the re-use and redevelopment of previously developed sites and existing buildings within Brentford 3. To provide a range of community, education, health, cultural, sport and entertainment facilities that will support Brentford's growing community, particularly young and old people 4. To ensure that the design of new developments will create and reinforce Brentford's local distinctiveness 5. To support Brentford's distinctive role for the provision of Waterside industries and support facilities and reconnect the area with its unique waterside location 6. To regenerate Brentford town centre as a vibrant district centre, that celebrates the town's heritage and waterside location 7. To ensure that all new developments within Brentford contributes to the Community Plan goal of a 'carbon-neutral' borough and address key environmental issues that exist within the</p>												1									1		2								2	+		3							3	+	+		4						4	0	+	0		5					5	0	+	0	+		6				6	0	+	+	+	+		7			7	+	0	0	0		+	0		8	8	+	+	+	+	0	0	+		9	9	+	+	+	0	0	0	+	0	
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		<p>area</p> <p>8. To continue to promote the Great West Road as a vibrant gateway to and from London</p> <p>9. To continue to support the relocation of Brentford Football Club</p> <p>All objectives have been assessed as having either positive or neutral impacts on each other.</p>
<p>Is it clear how the DPD relates to other plans in the authority's LDF and other relevant plans prepared by neighbouring authorities?</p>	<p>Representations on the Preferred Options from the Mayor of London</p> <p>West London Retail Needs Study</p> <p>Urban Design Appraisal (Background Paper)</p> <p>Issues and Options Paper</p> <p>BAAP Introduction</p> <p>Key diagram</p> <p>Implementation</p>	<p>The BAAP has been prepared within the context of the London Plan. The general approach is consistent with that of the London Plan as set out in Part C of Test 4.</p> <p>This study has reviewed the relationship of Hounslow, Hammersmith and Fulham and Ealing within the wider sub-region. In particular, it describes the influence of key competing neighbouring strategic centres on the current and future role of West London centres. The study informs and guides town centre/retail planning within the three boroughs.</p> <p>The appraisal takes into account views, landmarks, conservation areas and Kew World Heritage Site within the London Borough of Richmond Upon Thames. A representative from the Royal Botanic Gardens, Kew also attended the Brentford Community Urban Design Workshop.</p> <p>Included reference to the Employment DPD being prepared in parallel and information on how to become involved in the consultation.</p> <p>Paragraph 1.6 of the BAAP makes reference to the consistency with Hounslow's Employment DPD, which has been prepared in parallel with the BAAP.</p> <p>The key diagram shows the BAAP area in its sub-regional context including Hounslow, Chiswick, Richmond and Ealing town centres.</p> <p>In the implementation section following policies, reference is made to relevant policies in the Employment DPD and saved policies in the UDP.</p>

<p>Where there are overlaps, are these consistent/complementary?</p>	<p>BAAP Proposals Map</p> <p>Appendix 2</p>	<p>Whilst the designation of sites within the Employment DPD is reflected on the Proposals map accompanying the BAAP, there is no duplication or overlapping of policies.</p> <p>Whilst the BAAP includes proposals for Employment sites, these are not shown in the Employment DPD as it is outside the scope of the Employment DPD to consider proposed non-employment uses. Proposal sites will be identified in Site allocations DPD for the wider Borough, which is being prepared in conjunction with the Core Strategy.</p> <p>Identifies UDP policies and designations which will replace by the Brentford Area Action Plan</p>
<p>Are there any obvious gaps in the coverage of the DPD having regard to its purpose and the relevant requirements set out in national planning policy statements</p>	<p>Local Development Scheme (LDS) BAAP Proposals Map Employment DPD</p>	<p>The role and subject of BAAP is set out Hounslow's LDS as: 'to address site specific redevelopment opportunities identified by development industry partners, stakeholders and the community. The plan will address issues relating to public transport, traffic management, town centre shops & services, waterside improvements, urban design, employment, open space, community and social provision, residential areas and affordable housing plus planning obligations.'</p> <p>Employment issues have been taken forward in the Employment DPD. Proposal sites for employment have been identified in the Brentford Area Action Plan (BAAP) where significant redevelopment is proposed and the Council has made the resolution to grant permission (subject to satisfactory completion of a legal agreement and consultation with the Mayor for London). Whilst the BAAP identifies two employment proposal sites, the Employment Development Plan Document (DPD) replaces the employment chapter and employment proposal sites in the UDP as described in the Employment DPD.</p> <p>UDP policies on affordable housing will continue to apply and will be reviewed as part of the Core Strategy.</p> <p>The Council's Planning Obligations Supplementary Planning Guidance (once adopted) sets out the general principles that apply across the Borough.</p>

	<p>Representations from Government Office for London</p>	<p>Reference was made to the management plan for the Kew Gardens World Heritage Site (WHS) located in LB Richmond. The proposals map for submission AAP incorporates the WHS proposed buffer zone as specified in the management plan.</p>
<p>Is it clear how any cross boundary issues are addressed?</p>	<p>Statement of Compliance</p> <p>BAAP Proposals Map</p> <p>Development site policies</p>	<p>The specific consultation bodies outlined in Appendix 2 of the Statement of Community Involvement includes all relevant authorities adjoining Hounslow, including London Borough of Richmond that borders with the BAAP area. London Borough of Richmond has been consulted throughout the process and raised no issues of inconsistency.</p> <p>Identifies the proposed buffer zone for Kew World Heritage Site.</p> <p>Under site designations and constraints the text makes reference to any relevant cross boundary planning issues and/or designations.</p>

TEST 7: The strategies/ policies/ allocations represent the most appropriate in all circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.

Activity	Evidence	Comments/ Actions
<p>Is it clear that the LPA considered all reasonable options and alternatives in preparing the DPD</p>	<p>Brentford 2003 A Snapshot (June/July)</p> <p>The Brentford Plan Options for the Future (June 2005)</p> <p>Brentford Plan Preferred Options for the Future questionnaire and background paper (Jan 2006)</p> <p>Brentford Area Action Plan Sustainability Report (Jan 2006)</p>	<p>Issues The issues consultation provided the community with the opportunity to prioritise the issues they considered to be most important and to identify any additional issues.</p> <p>Options The options consultation questionnaire (June 2005) presented consultees with at least four options under a series of topics as well as the opportunity to specify alternative options.</p> <p>At the end of the options consultation, a report was prepared summarising the options that received the highest proportion of support/ opposition under each topic. The report was presented at the Council's Isleworth and Brentford Area Committee.</p> <p>Section 5.2 of the <i>Brentford Area Action Plan Sustainability Report</i> (January 2006) published alongside the preferred options explained how the Council considered responses to the options consultation. It sets out the reasons that some options were rejected in favour of others and the basis for this. Where an option was carried forward or not, evidence to support the Council's view is presented to demonstrate that it was an objective assessment.</p> <p>Preferred Options At the preferred options, the Council demonstrated how it had considered alternative options through the sustainability appraisal. In the <i>Brentford Area Action Plan Sustainability Report</i> (Jan 2006) the assessment of significant effects arising from the preferred options included an appraisal of a 'Do nothing' option (relying on national, regional guidance) and 'status quo' (UDP).</p>

		<p>The preferred options were considered to be the most appropriate from the SA of alternative options.</p>
<p>Are the assumptions in the DPD set out clearly and are they supported by evidence?</p>	<p>Brentford Area Action Plan Sustainability Appraisal Report July 2007 Limitations of the information and assumptions made</p> <p>BAAP Spatial Portrait and Key Issues</p>	<p>The assumptions made in preparation of the preferred options and reflected in the submission version of the DPD are identified in the <i>Brentford Area Action Plan Sustainability Report</i> (July 2006) – para. 4.20.4 and the <i>Brentford Area Action Plan Sustainability Report (July 2007)</i> Section 4.4. Key assumptions made include that the importance given to the issue of climate change will increase, and that the pressure for residential development on existing employment land will continue. There is also an assumption that there will be no new significant transport infrastructure in the Borough.</p> <p>Assumptions are explicit in the Key Issues section of the document. This provides background evidence in relation to the demographic trends, physical characteristics including the waterways, environmental challenges, service provision and facilities, economic issues for the Great West Road and Brentford town as well as congestion.</p> <p>Broadly speaking there is an overriding assumption there will no major change to planning policy including the major approaches to developing sustainable communities, reducing the need to travel, focusing high trip generating uses in locations accessible by public transport and accommodating growth on previously developed land.</p> <p>Assumptions are also explicit in the context and justification supporting policies. A summary of the key assumptions for each BAAP policy is given below:</p> <p>BAAP1</p> <ul style="list-style-type: none"> • The population of the Plan area will continue to grow as a result of new housing development creating a demand for new services and infrastructure. • There will continue to be pressure for residential on employment sites due to the higher value gained for residential development.

		<ul style="list-style-type: none"> • There will not be a step change in modes for the movement of people and goods. The area will continue to be characterised by high levels of traffic which will continue create problems of poor air quality and noise pollution. • The risk of flooding in parts of Brentford will remain high • The importance of addressing issues of climate change through planning will increase. • The development industry will increasingly embrace mixed use development. <p>BAAP2</p> <ul style="list-style-type: none"> • The principles of high quality urban design set out in PPS1 will continue to be promoted. • Listed buildings, areas of townscape character and other historic assets will continue to be protected. <p>BAAP3</p> <ul style="list-style-type: none"> • The population of the Plan area will continue to grow as a result of new housing development creating a demand for new services. • Wherever possible, retail and service growth should be accommodated within existing centres. • That retail expenditure is increasing and that there is need, demand and capacity for additional retail floorspace in Brentford town centre to ensure that it maintains its role as a district centre. <p>BAAP4</p> <ul style="list-style-type: none"> • The Great West Road will continue to be a strategic economic location. • There will continue to be pressure for residential on employment sites due to the higher value gained for residential development • There will be no new major public transport infrastructure serving the area. Accessibility by public transport will not change to the extent that locations with low levels of access to public transport will be as accessible as currently sustainable locations • The principles of high quality urban design set out in PPS1 will continue to be promoted. <p>BAAP5</p>
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		<ul style="list-style-type: none"> • There will continue to be an increase in the total number of boats using the canal network increasing the demand for maintenance and refit work. <p>BAAP6</p> <ul style="list-style-type: none"> • The population of the Plan area will continue to grow as a result of new housing development creating a demand for new services. <p>BAAP7</p> <ul style="list-style-type: none"> • There will be no new major public transport infrastructure serving the area. Accessibility by public transport will not change to the extent that locations with low levels of access to public transport will be as accessible as currently sustainable locations • There will not be a step change in modes for the movement of people and goods. The area will continue to be characterised by high levels of traffic which will continue create problems of poor air quality and noise pollution.
Does the evidence clearly support the policies in the DPD?	BAAP Policy Justification and support text	<p>The reasoned justification for each BAAP policy and supporting text to the development site policies outlines the evidence that forms the basis for the policy.</p> <p>Some parts of the policies also reflect and implement regional and national planning guidance and therefore do not rely on specific local evidence.</p> <p>The specific local and strategic evidence supporting the BAAP is as follows.</p> <p>BAAP1 LB Hounslow Air Quality Action Plan (September 2005) LB Hounslow Strategic Flood Risk Assessment Brentford Health Impact Assessment Brentford Area Action Plan Education Provision Report Brentford Open Space Provision Study</p> <p>BAAP2 Brentford Urban Design Appraisal Background Document Kew World Heritage Site Management Plan</p>

		<p>BAAP3 West London Retail Needs Study 2006 Brentford Transport Study Brentford Urban Design Appraisal Background Document</p> <p>BAAP4 Brentford Urban Design Appraisal Background Document Brentford Transport Study</p> <p>BAAP5 Strategy for the Protection of Boatyards for British Waterways London Region (April 2007)</p> <p>BAAP6 Brentford Health Impact Assessment West London Retail Needs Study 2006</p> <p>BAAP7 Brentford Transport Study LB Hounslow Local Implementation Plan</p> <p>Development Site Policies</p> <p>Where relevant, each of the development site policies have been informed by the documents listed above under each of the BAAP policies, as well as national, regional and local planning guidance. Any specific evidence for each development site policies is identified below.</p> <p>BE1 – Gillette and BE4 - B SkyB The London Plan identifies the Great West Road as Industrial Business Park (IBP), Strategic Employment Location (SEL). The Plan states that borough's should identify the boundaries for their SELs and this has been done through the draft Employment DPD which has been prepared in parallel with the BAAP. Uses consistent with the function of an IBP are designated by the draft Employment DPD. IBPs are for firms that need better quality industrial surroundings including B1b, B1c and high value B2</p>
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		<p>activities. Development sites BE1 and BE4 are located within a designated IBP and the policies are consistent with an IBP designation.</p> <p>Outline planning permission has been granted for the redevelopment of BE4 (Planning ref 00558/A/P25). The Council's Sustainable Development Committee made the resolution to grant planning permission for the redevelopment of BE1 (Planning ref 00505/AP/P74) following proposal on the 15th January 2007 subject to completion of a legal agreement and in the event that the Mayor for London does not issue a direction to refuse the application.</p> <p>M1 – Alfa Laval and M2 – Wallis House The Hounslow Employment Land Study identified these sites as performing poorly in terms of industrial demand with evidence of long term vacancies and low quality stock. The draft Employment DPD has not designated these sites for employment uses.</p> <p>Planning permission was been granted for the mixed use redevelopment of development site M2 for a mix of employment, residential, community and leisure uses (Planning ref 00505/P/P59) on 8 December 2006. A planning application was received on the 10 April 2007 (Planning ref 00505/Z/P31) for the mixed use redevelopment of Alfa Laval incorporating offices, a hotel and residential uses).</p> <p>M3 – Kew Bridge Site Planning Appeal AAP/F5540/A/05/1180177 Kew World Heritage Site Management Plan</p> <p>M4 – Thames Water Outline planning permission was granted for a residential scheme on this site on 31 August 2001, which has since been implemented (Planning ref 00657/B/P15).</p> <p>M7 – Somerfield Making Better Use of Supermarket Sites, The London Plan Draft Best Practice Guidance Planning for Town Centres: Guidance on Design and Implementation tools</p>
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		<p>M8 – Brentford Waterside Hounslow Strategic Flood Risk Assessment West London Retail Needs Study Planning for Town Centres: Guidance on Design and Implementation tools Strategy for the Protection of Boatyards for British Waterways London Region (April 2007)</p> <p>RR1 Hounslow Strategic Flood Risk Assessment (2007)</p> <p>There is not considered to be any conflicts between the evidence available to the Council and the policies in the DPD.</p>
<p>Is the evidence robust and credible – i.e. has it been prepared in accordance with national planning policy and good guidance?</p>		<p>The following documents, form the evidence base for the DPD and reflect national and regional guidance as follows</p> <p><u>Local</u></p> <p>London Borough of Hounslow Strategic Flood Risk Assessment (SFRA) 2007 The SFRA delineates areas that have a ‘low’, ‘medium’ and high probability of flooding within the Borough in accordance with Planning Policy Statement 25 Flooding. The SFRA has been prepared in consultation with the Environment Agency.</p> <p>West London Retail Needs Study 2006 The approach to the study draws on the emerging recommendations of our Good Practice Guidance for the Department of Communities and Local Government (DCLG) on how to assess the need for, and impact of key town centre uses. This Study also comprises detailed audits and qualitative health checks of the relative vitality and viability of each Borough’s major and smaller centres based, where possible, on the key performance indicators set out in PPS6</p> <p>Brentford Area Action Plan Transport Study 2007 The study brief was developed and agreed with the Highways Agency and Transport for London and comments have been received from a variety of stakeholders.</p>

	<p>Brentford Urban Design Appraisal The urban design appraisal was prepared to address key principle (iv) of PPS1 (para. 13). An independently facilitated workshop was held with local stakeholders to consult on the initial findings of the appraisal and to gain their input in on the qualities and characters of Brentford.</p> <p>Brentford Health Impact Assessment (HIA) Commissioned by the London Borough of Hounslow's Adults, Health and Social Care Scrutiny Panel in February 2005 to assess the overall impact of development plans for Brentford. The production of the document was led by the Public Health Directorate of Hounslow Primary Care Trust. The structuring of the report was assisted by the use of the Greater London Authority's HIA Screening Tool and Public Health Ireland's rapid Interactive Tool.</p> <p>London Borough of Hounslow Air Quality Action Plan Prepared by the Borough's Environmental Strategy unit the approach to development the plan has included due regard to the available official guidance (Part IV of the Environment Act 1995, Local Air Quality Management Policy Guidance, Defra, 2003, Air Quality: Planning for Action, Part 2 of the NSCA's Guidance on the Development of Air Quality Action Plans and Local Air Quality Strategies, NSCA, 2001) as well as consideration of the policies and actions within neighbouring London Borough's and those of the GLA.</p> <p>Brentford Area Action Plan Education Provision Report by the Assistant Director of Education to the Council's Asset Strategy group on increasing education provision in Brentford.</p> <p>London Borough of Hounslow Implementation Plan The Local Implementation Plan (LIP) is a statutory document that all London Boroughs are required to prepare under the Greater London Authority Act 1999. Under this Act, individual Boroughs are obliged to implement the Mayor of London's Transport Strategy, 2001. The finalised LIP establishes, in generalised form, a ten-year programme of improvements to the Borough's transport environment.</p> <p><u>Strategic</u></p>
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		<p>Kew World Heritage Site Management Plan Kew was inscribed as a World Heritage Site in 2003. An integral part of the nomination process is the preparation of a World heritage Site (WHS) Management Plan. The aim of the Management Plan is to ensure that the Outstanding Universal Values of the Site are sustained and conserved for the benefit of future generations.</p> <p>Strategy for the Protection of Boatyards for British Waterways London Region (April 2007) The purpose of the report is to provide an up to date survey of boatyard facilities on the British Waterways London canal network, and to make recommendations as to those facilities that merit protection through the planning process.</p>
<p>Where a balance has been struck between competing alternatives – is it clear how those decisions have been taken</p>		<p><i>The Brentford Plan Preferred Options for the Future</i> consultation document references the <i>Brentford Area Action Plan Sustainability Appraisal Report</i> as presenting the details background that informed the preferred options. Section 5.2 of the <i>Brentford Area Action Plan Sustainability Appraisal Report</i> provides a detailed assessment of the options. A table is present of the options consulted on including a summary of the responses to consultation (Regulation 25) and the results of the sustainability appraisal of the options. Following this is an identification of key issues, including the consideration of national regional guidance and issues that have been considered for including or rejecting an option.</p> <p>The <i>Sustainability Appraisal Report (July2007)</i> also assesses the preferred options and policies for their effects on social, economic and environmental issues. The sustainability impact of the policies and preferred options were compared with ‘do nothing’ and ‘status quo’ scenarios.</p> <p>The Schedule of Representations sets out how the Council has addressed the issues raised at the preferred options consultation (Regulation 26).</p>

TEST 8: There are clear mechanisms for implementation and monitoring

Activity	Evidence	Comments/ Actions
Does the DPD contain targets and milestones which relate to the delivery of the policies including housing trajectories where the DPD contains housing allocations.	BAAP	Each policy in the BAAP includes a section for monitoring policy implementation. For each indicator the DPD identifies a target and a data source. These indicators include where relevant Core Output Indicators and indicators from other local documents including the Local Area Agreement.
It is clear how these are to be measured and are these linked to the production of the AMR	BAAP Brentford Area Action Plan Sustainability Appraisal Report	Sections 2.11 and 2.12 of the BAAP set out how the implementation of the policies in the plan will be monitored through the AMR. The SA Report sets out indicators for monitoring the significant sustainability effects of the DPD.
Are the delivery mechanism and timescale for implementation for the policies clearly identified.	BAAP	Each policy in the BAAP has an implementation section setting out the delivery mechanisms for the policy. This section also identifies, where relevant, how other local plans and strategies will deliver policies in the BAAP. Unless specifically identified, the timescale for the implementation of policies is identified as the lifetime of the plan (to 2018).
Is it clear who is intended to implement each policy? Where the actions required to implement policy are outside the direct control of the LPA is there evidence that there is the necessary commitment from the relevant organisation to implementation of the policies.	BAAP	The BAAP makes references to relevant policies, plans and strategies for implementing its policies. Where the strategies and plans of organisations outside the LPA are identified in the implementation strategy of the BAAP i.e. Thames Landscape Strategy, Hounslow Primary Care Trust and the Local Education Authority, Highways Agency, Transport for London, Thames Water Utilities Ltd, the Council has met with these organisations to allow them to provide feedback on the policies in the BAAP.
Do the processes for measuring the success of	BAAP	Monitoring of the BAAP incorporates national core output indicators and has been prepared in accordance with PPS12 and the <i>Local Development</i>

the DPD accord with national guidance?		<i>Framework Monitoring: A Good Practice Guide.</i>
Does the DPD explain how its key policy objectives will be achieved?	BAAP	The implementation section for each spatial policy in the DPD makes reference to relevant commitments in the Community Plan, the Local Area Agreements and the Draft Local Implementation Plan that will support the delivery of the strategy in the BAAP. The policies seek to implement BAAP objectives as demonstrated under soundness test 6.

TEST 9: It is reasonably flexible to enable it to deal with changing circumstances

Activity	Evidence	Comments/ Actions
<p>Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>BAAP Key Issues Context to policies</p> <p>Introduction (Para 1.11)</p> <p>Implementation of the Development Site Policies</p>	<p>These sections set out the underlying assumptions of the plan. There assumptions are summarised under test 7.</p> <p>Table 9a below summarises these assumptions, the likelihood of change, and the flexibility of the BAAP to deal with this change.</p> <p>The plan will be reviewed to reflect any changes in the aspiration of the community and regeneration need of the area by reviewing the evidence base (effectiveness of policies and significant effects) on an annual basis through the Annual Monitoring Report.</p> <p>This section sets out how the risks to the implementation of the development sites put forward in the BAAP have been addressed.</p> <p>A further risk to the plan is the outcome of a planning appeal for a major mixed-use development incorporating 993 new residential units, commercial leisure and community uses on the Commerce Road industrial estate, which has been designated as a Strategic Industrial Location in the draft Employment DPD. The site was identified as an employment proposal site in the Preferred Options (site BE2) but has since been removed as the preferred uses are not considered deliverable. If the Secretary of State allows the appeal, this will have serious implications for the area's infrastructure and the proposals in the plan may need to be reviewed.</p>
<p>Are Development Control Policies written in a generic form to enable them to provide a robust and consistent framework for considering planning applications?</p>	<p>BAAP Policies BAAP1 to BAAP7</p>	<p>The BAAP policies will be implemented through development control and the development site policies. Each of the BAAP policies is assessed below in Table 9b to determine whether they are robust to deal with changing circumstances.</p>

Table 9a Assumptions underlying Area Action Plan and assessment of potential change

Assumption	Likelihood of change	Flexibility in DPD to deal with change
There is an overriding assumption there will no major change to planning policy including the major approaches to developing sustainable communities, reducing the need to travel, focusing high trip generating uses in locations accessible by public transport and accommodating growth on previously developed land.	Low	There is unlikely to be a shift away from the current policy approach, with the recent white paper on 'Planning for a Sustainable Future' not outlining a change in direction particularly to the policy approach.
The population of the Plan area will continue to grow as a result of new housing development creating a demand for new services and infrastructure.	Low	The delivery of housing is inherent in recent guidance (PPS3). To accommodate the step change in housing delivery requires the associated social infrastructure. It is considered highly unlikely that there would be any change, which would necessitate giving priority to uses other than housing, education and community facilities.
There will continue to be pressure for residential on employment sites due to the higher value gained for residential development	Low	Until housing need is met there will continue to be pressure on employment land.
The development industry will increasingly embrace mixed use development.	Low	Planning Policy Statement 1 places sustainable development as the key principle underpinning the planning system and this is supported in the recent <i>The Planning For a Sustainable Future White Paper</i> . Mixed communities are a key component in the delivering of sustainable development by integrating different land uses and minimising the need to travel.
There will not be a step change in modes for the movement of people and goods. The area will continue to be characterised by high levels of traffic which will continue create problems of poor air quality and noise pollution.	Low	Both the A4/M4 and A315 Brentford High Street are characterised by high levels of traffic and congestion. Without major changes in technology or new public transport infrastructure the problems of noise and air pollution associated with large volumes of traffic will continue.
The risk of flooding in parts of Brentford will remain high	Low	Hounslow's Strategic Flood Risk Assessment identifies the possible increases in flood risk as a result of climate change.
The importance of addressing issues of climate change through planning will increase.	Low	<i>The Planning For a Sustainable Future White Paper</i> seeks to make planning more responsive to the future challenges of climate change.
The principles of high quality urban design set out in Planning Policy Statement 1 will continue to be promoted.	Low	No changes to the design sections of Planning Policy Statement 1 have been proposed in <i>The Planning For a Sustainable Future White Paper</i> .
Listed buildings, areas of townscape character and other historic assets will continue to be protected.	Low	There are no proposed changes to the legislation protected listed buildings and conservation areas.
The Great West Road will continue to be a strategic economic	Low/Medium	Parts of the Great West Road have been designated as Strategic

location.		Industrial locations or Key Existing Office Locations within the Employment DPD, which seeks to protect the employment capacity of these sites.
There will be no new major public transport infrastructure serving the area. Accessibility by public transport will not change to the extent that locations with low levels of access to public transport will be as accessible as currently sustainable locations	Low	There are no proposed major transport improvements in the Mayor's Transport Strategy that would serve the Brentford area. The majority of journeys will continue to be by car.
There will continue to be an increase in the total number of boats using the canal network increasing the demand for maintenance and refit work.	Low	British Waterways predict that boat ownership on the canal network will increase by 2.4% per annum until 2016.

Table 9b Flexibility of BAAP Policies

BAAP Policies	Assessment of the flexibility of policies
BAAP1 Sustainable Development	This policy seeks to address specific local circumstances that were identified through the Sustainability Appraisal. The Council is committed to reviewing this evidence base through the Annual Monitoring Report. However, the policy remains flexible, as the policies allow each development to be assessed on an individual and/or cumulative basis, and will allow changes in local circumstances to be accommodated.
BAAP2 Urban Design	This policy seeks to deliver improvements to the overall townscape setting out key improvements that should be achieved over the lifetime of the plan. Whilst addressing locally specific issues the policies are worded to allow changes in local circumstances e.g. addition of a listed building to the Listed Buildings at Risk Register, to be accommodated.
BAAP3 Regeneration of Brentford Town Centre	This policy sets the overall objectives for the regeneration of the town centre but is not prescriptive about how and where new development is delivered.
BAAP4 The Great West Road	This policy set overall objectives for new development along the Great West Road but is not prescriptive about how and where new development is delivered. The policy also allows changes in local circumstances to be accommodated by setting out relative criteria that can assess the cumulative impact of individual developments.
BAAP5 Regeneration and Protection of Brentford's River and Canal Support Facilities, Infrastructure and Activities	The designation of water related facilities seeks to retain river and canal support facilities to meet existing and future demand. However, the policy is flexible allowing the loss of water related facilities where it can be demonstrated that the proposals meet specific criteria.
BAAP6 Large Scale Arts, Cultural, Entertainment and Leisure Facilities	The designation of existing arts, cultural, entertainment and leisure facilities seeks to protect existing facilities. However, the policy sets out that redevelopment and re-provision will be supported where this results in an improvement to services.

BAAP7 Sustainable Access	This policy seeks to deliver improvements to access within the plan area and protect existing facilities. The implementation section of the policy sets out the recommendations from the BAAP Transport Study, but the list is not considered exhaustive. In addition, the policy allows for the relocation of the bus garage provided there is no loss of capacity or Transport for London agree that it is no longer required.
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