

Public name: Resident 1

Comment: I support it in general. In particular I would like to see the overall state of Willesden Lane and surrounding residential streets be improved - better street cleaning so less fly tipping and littering (there is a lot all the time currently), feeling of safety (lots of youth gatherings and car gatherings), less homeless people and less drug users (often see them around Willesden Lane and in the cemetery). I'd also like to see improvements in shopfronts on Willesden Lane as a lot are derelict, covered with graffiti, very unsightly not a great high street, and attracting further littering / ASB.

Public name: Brent Eleven Streets RA

Comment: Aspirational, inspiring and hopefully deliverable

Public name: Resident 2

Comment: The plan is very valuable tool that will have a very possible impact on the neighborhood

Public name: Resident 3

Comment: Kilburn Neighbourhood Plan Consultation

Public name: Resident 4

Comment: I am writing to give general support for the adoption of the neighbourhood plan for the whole of Kilburn

Public name: Resident 5

Comment: The Plan is to be welcomed however there are some errors:

On the Open Green Spaces Map it is misleading to show some insignificant gardens such as Glengall Rd and then show none others (Brondesbury Rd gardens are far bigger and form a corridor) – either show all private gardens or none. This needs consistency.

Open green spaces such as Streatley Rd Park, Kimberley Park Willesden Lane are not shown. The North London Railway is an official wildlife corridor in the London Plan and yet does not appear on your map.

On the map of Entertainment Centres the Kilburn Arms, Willesden Lane is incorrectly located. Under the Listed Buildings, it is incorrect to say just Paddington Old Cemetery chapels are Listed - the Listing includes the Lodge buildings, it also includes the entirety of the cemetery as a Listed Landscape.

Under Locally Listed Buildings, this only lists the Camden buildings. On the Brent side you have:

- Brondesbury Mews
- 10 Brondesbury Rd
- 76-82 Brondesbury Rd
- 24-34 Glengall Rd
- 41-61 Kilburn High Rd
- Cock Tavern Kilburn high Rd
- Earl Derby Kilburn high Rd
- 259-267 Kilburn High Rd
- 325 Kilburn high Rd

- Kilburn Arms, 99-101 Willesden Lane
- 134-142 Willesden Lane
- Christ Church School 138-142 Willesden Lane
- 96-98 Brondesbury Rd

Public name: Resident 6

Comment: An overall comment - it should not be referred to as the Kilburn Neighbourhood Plan, since, by decision of Brent Council, South Kilburn is not part of it.

Public name: Resident 7

Comment: I welcome the report and congratulate the committee on its attention to detail. I support the elements of the Plan that seek to stamp an identity on Kilburn, which has historically been rather sidelined as the Cinderella of both Camden and Brent boroughs. Historically, it has suffered by being split in two by the A5 trunk road - pedestrianising Kilburn High Road would be the single biggest step that the boroughs could take to unlock Kilburn's potential. Of course, this will never happen, so Kilburn will forever remain hamstrung by the ever-flowing traffic.

My other observation concerns the cultural mix of the people who live and work in Kilburn. The last 20 or so years have seen the long-standing yet ageing Irish and Caribbean communities displaced by - well, no one is quite sure. Afghans, Syrians, Iranians, Iraqis, Somalis, the majority of whom owe no allegiance to their host country, at least for the first few years after their arrival (assuming they stay that long). These transient communities live parallel lives to the indigenous population. This means that the Neighbourhood Plan is being drawn up with very little input from them. And in a way, it has to be like that, because the Plan is a long-term project, whereas these communities are in transit. The cultural mix could be seen as enriching city life, but that is at the expense of the Plan's attempts to create sustained social cohesion.

Public name: Resident 8

Comment: The overall Plan is very comprehensive, gives clear information on the objectives identified for the area. The details also provide good information on the vision the Forum has for the area.

Public name: Theatres Trust

Comment: Policy DK4: Social and Community facilities

We welcome and support this policy, which identifies valued local facilities including the Kiln Theatre and former Gaumont State and sets out strong protection against loss as well as support for improvement of facilities and return to wider use of the Gaumont State. We consider this policy to be consistent with statutory requirements, and that it complements existing Local Plan, London Plan and NPPF policy.

Public name: Brent Cycling Campaign

Comment: Brent Cycling Campaign (BCC) broadly supports the Draft Kilburn Neighbourhood Plan presented by the Kilburn Neighbourhood Plan Forum. BCC supports proposals within the draft plan to create healthy neighbourhoods, as well as play streets and school streets. BCC

supports proposals to improve public realm, introduce greening and trial closures of residential roads to create public space. BCC supports the proposals to deliver more mobility hubs in Kilburn and supports proposals for better wayfinding for those walking and cycling.

However, BCC would encourage the plan to go further and be bolder in calling for segregated cycling infrastructure in Kilburn, particularly on Kilburn High Road and other main roads in Kilburn, including at major junctions.

From: [Planning Strategy](#)
To: [Planning SE](#)
Cc: NH/25/11393 Kilburn Neighbourhood Plan consultation
Subject:
Date: 10 July 2025 11:15:54

For the Attention of: Planning Strategy Team, Brent Council

Proposal: Kilburn Neighbourhood Plan Regulation 16 Consultation

National Highways Ref: NH/25/11393

Thank you for your email inviting National Highways to comment on the above consultation and indicating that a response is required by 11 July 2025. We have undertaken a review of the July 2024 Kilburn Neighbourhood Plan, which sets out a vision for the future of the Parish and the planning policies which will be used to determine planning applications locally up to 2033.

National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, the nearest SRN route is the M1 Junction 1, which is approximately 2 miles from the neighbourhood area via the A5. The A5, as well as all the other A roads in this area, is managed by Transport for London.

National Highways is a key delivery partner for sustainable development promoted through the plan-led system and, as a statutory consultee, we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. We are aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generated at source and encourage more sustainable travel behaviour.

The Plan seeks to future-proof growth and development in Kilburn, setting out a vision that *"Kilburn will be a bustling, commercially thriving, urban hub"*. It contains a suite of policies to achieve this vision, including policies to improve the public realm, encourage sustainable travel locally, protect historic buildings and community facilities, and support a high-quality high street offer. Proposed development allocations are not within the remit of the Plan and instead are determined by the Brent and Camden Local Plans, Kilburn falling into both of these local authority areas.

We have undertaken a review of the objectives and policies set out in the Plan and welcome the themes of improving local conditions for walking and cycling as a means of encouraging sustainable travel. The Plan is prepared in general conformity with the strategic objectives of the Local Development Plans (i.e. the Brent Local Plan and Camden Local Plan) and the London Plan, as well as the Mayor's Transport Strategy (2022 revision). The policies contained within the draft Kilburn Neighbourhood Plan will not have a

significant impact on the Strategic Road Network. Therefore, National Highways has no further comment to make regarding the Plan.

In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at planningse@nationalhighways.co.uk.

Kind Regards,

Assistant Spatial Planner
Spatial Planning South East
National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey |
GU1 4LZ
Web: nationalhighways.co.uk

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

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Date: 09 July 2025
Our ref: 513995
Your ref: Kilburn Neighbourhood Plan



Mr Paul Lewin
Brent London Borough Council

BY EMAIL ONLY
planningstrategy@brent.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Dear Mr Lewin

Kilburn Neighbourhood Plan 2023-2033 - Pre-submission Regulation 14 Consultation

Thank you for your consultation on the above dated 28 May 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

From: on behalf of [Town Planning NWC Planning Strategy](#)
To: [brent Kilburn Neighbourhood Plan consultation](#)
Subject:
Date: 29 May 2025 10:25:23

OFFICIAL

Network Rail response on Neighbourhood Plans.

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network.

Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.

Network Rail – railway specific advice notice to LPAs/Developers Please note that whilst Network Rail (NR) is submitting responses via the planning application process, it should be born in mind by the LPA/developer that the operational railway presents risks/issues that are different/unique to the risks posed by works taking place adjacent to non-railway undertaker land. Works on this site therefore must be undertaken with the supervision of NR via the ASPRO (asset protection) team to ensure that the works on site do not impact the safe operation, stability, integrity of the railway & its boundary. The LPA/developer are advised that unauthorised works adjacent to the railway boundary could impact the operation of nationally significant infrastructure & the applicant would be liable for any and all damages & costs caused by any works undertaken in this scenario. Therefore, the developer is requested to ensure that the development meets with NR requirements for works/developments adjacent to the railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal.

Asset Protection Comments:

Developments in the policy area should be notified to Network Rail to ensure that:

(a) Access points / rights of way belonging to Network Rail are not impacted by developments within the area.

(b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g.

- Drainage works / water features
- Encroachment of land or air-space
- Excavation works
- Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues
- Lighting impacting upon train drivers' ability to perceive signals
- Landscaping that could impact upon overhead lines or Network Rail boundary treatments
- Any piling works

- Any scaffolding works
- Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949)
- Any use of crane or plant
- Any fencing works
- Any demolition works
- Any hard standing areas

For any proposal adjacent to the railway, Network Rail would request that a developer constructs (at their own expense) a suitable steel palisade trespass proof fence of at least 1.8m in height.

All initial proposals and plans should be flagged up to the Network Rail Town Planning at the following address:

Email: TownPlanningNWC@networkrail.co.uk

Railway Station

Consideration should be given in Transport Assessments to the potential for increased footfall at Railway Stations as a result of proposals for residential development / employment areas within the neighbourhood area. Location of the proposal, accessibility and density of the development, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall and the need for car parking, the council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions.

Level Crossings

Developments within the neighbourhood area should be accompanied by a TS/TA which includes consideration of the impact of proposals upon any level crossings with mitigation implemented as required. We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and funded by the developer(s). TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail. Contributions will be sought where proposals impact on level crossings to mitigate the impacts of those developments. Where level crossing closure is the only option, the applicant is advised that closure would be via s257 of the T&CPA, and that closure would be required before the occupation of any dwellings.

Network Rail – railway specific advice notice to LPAs/Developers Please note that whilst Network Rail (NR) is submitting responses via the planning application process, it should be born in mind by the LPA/developer that the operational railway presents risks/issues that are different/unique to the risks posed by works taking place adjacent to non-railway undertaker land. Works on this site therefore must be undertaken with the supervision of NR via the ASPRO (asset protection) team to ensure that the works on site do not impact the safe operation, stability, integrity of the railway & its boundary. The LPA/developer are advised that unauthorised works adjacent to the railway boundary could impact the operation of nationally significant infrastructure & the applicant would be liable for any and all damages & costs caused by any works undertaken in this scenario. Therefore, the developer is requested to ensure that the development meets with NR requirements for works/developments adjacent to the railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The

applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal.

From

Town Planning Technician NWC

Network Rail

TownPlanningNWC@networkrail.co.uk

From: Planning Strategy

Sent: Wednesday, May 28, 2025 4:27 PM

To: Planning Strategy

Subject: Kilburn Neighbourhood Plan consultation

Dear Sir/ Madam,

Notice of receipt of a proposed Neighbourhood Plan

Kilburn Neighbourhood Forum has submitted its proposed Neighbourhood Plan to Camden and Brent Councils, in accordance with the Neighbourhood Planning Regulations 2012.

We are now consulting residents and interested stakeholders on this proposed Plan.

How does this affect me?

A Neighbourhood Plan is a statutory planning document setting out planning policies for the development and use of land in the area. The Plan sets out a range of policies on matters including a design code for Kilburn High Road area, public realm improvements, shopfronts, affordable workspaces, social and community facilities, and markets / outdoor stalls.

The Neighbourhood Plan, if approved, will be used, alongside Council policies when making planning decisions in the neighbourhood area.

To view the proposed Neighbourhood Plan and supporting documents (including a map showing the boundary for the Plan - the 'neighbourhood area') and for further information on how to respond to this consultation please go to:

Brent Council: <https://haveyoursay.brent.gov.uk/en-GB/projects/kilburn-neighbourhood-forum-draft-plan-proposal>

Comments must be received by midnight 11th July 2025. This can be done via the consultation portal accessed via the link above or alternatively by email to planningstrategy@brent.gov.uk or post to:

Paul Lewin
Spatial and Transportation Planning Manager
Brent Civic Centre
Engineers Way
Wembley, HA9 0FJ

Please note that the Council will not register anonymous responses. You should provide your name and if relevant, the organisation that you are working for, and that which you might be representing.

When reporting the consultation responses, organisation names will be referenced by the Councils and potentially by the person appointed to undertake the plan's examination. However, no individual's name or personal details of respondents will be made publicly available. Please can you indicate with your response whether you wish to be informed by the Council of whether the Neighbourhood Plan is 'made' (adopted) following a successful referendum. Please also indicate if you would like to be informed of other planning policy consultations by having your details put on our

planning policy consultation database. This information will only be used in relation to consultations on the Council's planning and associated documents. Unless you indicate that you want to be put on this database, your personal details will only be kept until the Council decides on whether to proceed with 'making' (adopting) the Neighbourhood Plan. Please see our [privacy policy](#) for more details.

What happens next?

Once the consultation has finished, the Councils will forward the responses and the Neighbourhood Plan to an independent examiner. The examiner will assess whether the plan meets the relevant legislation and statutory requirements. If the plan passes the examination, a referendum will be organised to give the area's residents registered to vote in local elections the final say on whether the Plan is to be used in determining planning applications in the designated neighbourhood area.

If you have any further queries, please do not hesitate to contact us:

Brent Council: planningstrategy@brent.gov.uk

Regards,

Planning Policy Team

Brent Council

If you wish to be removed from the Brent Council Planning Consultee mailing list, please notify us by emailing planningstrategy@brent.gov.uk

The use of Brent Council's e-mail system may be monitored and communications read in order to secure effective operation of the system and other lawful purposes.



Kilburn Neighbourhood Draft Plan Forum

planningstrategy@brent.gov.uk
planningpolicy@camden.gov.uk

Transport for London
Spatial Planning

8th Floor
5 Endeavour Square
London E20 1JN

11 July 2025

Phone
tfl.gov.uk

Re: Consultation on draft Kilburn Neighbourhood Plan (revised July 2024)

Thank you for giving Transport for London (TfL) the opportunity to comment on the draft Kilburn Neighbourhood Plan.

Please note that these comments represent the views of TfL officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer.

The London Plan was published in March 2021. Neighbourhood plans should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy (MTS). In particular, it is important that neighbourhood plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

We welcome the overall direction of the neighbourhood plan and particularly the emphasis on improved public realm and public safety. We do have concerns about one clause relating to building heights that does not appear consistent with Policy D3 of the London Plan, which should be amended. This and a number of other detailed comments and suggestions that are included in the appendix.

We look forward to continuing our work together in developing the neighbourhood plan.

Yours faithfully

Principal City Planner | Spatial Planning
Email:



Transport for London
Spatial Planning

8th Floor
5 Endeavour Square
London E20 1JN

Phone
tfl.gov.uk

| Policy | Page | Comments |
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| General comments | | <p>There are a number of references within the document to the evening economy. The Forum should also ensure that the relevant chapter highlights the need to ensure safe pedestrian and cycle routes are available during darker hours, where these routes in need of improvement are and that this is assessed as and when applications for uses that support the night-time economy come in.</p> <p>West Hampstead Station is in close proximity to the Neighbourhood Area. This station has been identified for improvements, including but not limited to SFA. The Plan should include a reference to the potential for neighbourhood CIL being applied to these improvements.</p> <p>The plan should identify improvements to walking and cycling routes to rail and Underground stations.</p> <p>We welcome that the Plan highlights the need to improve access for all. Brondesbury station has a proposed step-free access scheme which requires further funding to enable it to be delivered. We are working to secure funding for the scheme however any financial support that can be provided from third parties would be helpful for achieving this objective. There are currently no plans to provide step-free access at Kilburn High Road or South Hampstead; the proximity of these stations to the West Coast Main Line makes such projects very challenging and expensive.</p> |
| Kilburn Present: The | Pg 4 | Para. 3.5 - Kilburn additionally benefits from Bakerloo line services from Kilburn Park, which falls just outside the designated area and is only a few minutes' walk from Kilburn High Road station. |

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| neighbourhood plan area | | |
| A Welcoming Kilburn: The Pedestrian Environment | Pg 11 | Para. 5.10-5.13 – We support the ambition to address poorly maintained and left-over spaces. This should be expanded to highlight their impact on the feeling of safety in the public realm, with particular reference to the Mayor’s initiative to end violence against women, girls and gender-diverse people. Reference could be made to the GLA publication Safety in Public Space and the benefits of dialogue with women and girls and co-design in reimagining public space. |
| A Welcoming Kilburn: The Pedestrian Environment | Pg 11 | We support the proposal for mobility hubs set out in Paragraph 5.14, particularly as it highlights the need to restrict this to active travel modes to prevent inappropriate use of cars. Wherever possible, parking for micromobility should be located on designated areas of the carriageway rather than taking up footway space. We encourage reallocation of parking spaces for this purpose. While this is mentioned in the policy wording in WK2, it should also be highlighted here. |
| A Welcoming Kilburn: Green Infrastructure | Pg 12 | The biodiversity benefits of trees and other forms of planting should be highlighted. Also, the contribution of permeable surfaces to climate change adaptation (slowing down movement of water into the drainage system during heavy rainfall) and of trees to provide shade and shelter. |
| Policy WK1: High Road Public Realm | Pg 18 | <p>Policy WK1 should be amended to require maintenance of the public realm and we recommend that an additional part g to the policy as follows: ‘Contribute, through choice of durable, sustainable materials and resources for future maintenance, to ensuring that new public realm is well cared-for and remains high quality.’</p> <p>Part e of the policy should be amended to support increasing the amount of permeable surfacing and contributing to sustainable drainage.</p> |
| Policy WK2: Mobility Hubs | Pg 18 | We welcome the recognition that mobility hubs are best focused on active travel modes first in the last paragraph of the policy. This however it potentially confusing with the first paragraph, that states mobility hubs will be supported where they incorporate some of the uses listed, which contains EV charging points and car clubs spaces. It would be better to consolidate these two sections e.g. will be supported where they provide docking points/secure cycle parking facilities, may be supported if catering for EVs/car clubs but caution should be taken etc. |
| Project Box B: Green Corridor | Pg 19 | In project box B, it would be useful to be more specific about how the Forum expects to collaborate on Green Corridor proposals, ie ‘The Forum is keen to work with partners, to <u>plan</u> , deliver <u>and maintain</u> a connected green corridor...’ |

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| 6. A Characterful Kilburn: Design Guidance + Safer Places | Pg 20-23 | The reference to the Mayor's Good Growth by Design Guidance is welcomed. |
| 6. A Characterful Kilburn: Safer Places | Pg 24-25 | The reference to taking into account the 'Mayor's Violence Against Women and Girls Strategy' is welcomed. |
| Policy CK1 | Pg 26 | <p>Part c iii) suggests that, outside the High Road, Willesden Lane and Belsize Road, surrounding building heights should generally not be exceeded unless on urban design grounds. While development opportunities may be more limited outside of these areas, we nevertheless note that this clause appears to not conform to Policy D3 of the London Plan. That policy requires site capacity to be optimised through a design-led approach and that development must make the best use of land, with higher density development promoted in locations well connected by public transport. This is an important principle for making the most of opportunities to make new development less car dependent and thus minimise future pressures on the road network.</p> <p>The policy does require <i>due regard</i> for existing building proportions, but it does not follow that building heights should be bound by existing ones unless exceptional circumstances apply. This part of the policy should be edited to more clearly conform to Policy D3 of the London Plan.</p> |
| Policy CK3 (A characterful Kilburn): Streets for people | Pg 30 | <p>We strongly welcome the support for car-free developments. For clarity and effectiveness, we recommend that the policy is modified to read 'incorporate <u>are</u> car free policy'.</p> <p>We note that the policy also seeks to ensure the cycle parking is conveniently located and secure. Cycle parking provision at developments within this area should be delivered in accordance with Policy T5 of the London Plan. High-quality cycle parking should be provided to facilitate mode shift. We would additionally welcome a reference to LCDS within the policy and/or support text should be considered.</p> |
| Policy CK3 (A characterful | Pg 30 | Policy CK3 should additionally offer support to proposals that prioritise pedestrian and cycle movement over motor traffic, including through road space reallocation, and that reduce the need to travel by private car. It could promote streets with |

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| Kilburn): Streets for people | | appropriately placed and designed modal filters to reduce the volume of cars to improve safety for people walking and cycling and improve bus journey times. |
|------------------------------|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------|

From:
To: [PlanningPolic](#)
Subject: yComments on the Kilburn Neighbourhood Plan for Regulation 16
Date: 11 July 2025 18:01:41

Dear Camden Planning,

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Below are my comments on the Kilburn Neighbourhood Plan for Regulation 16 Consultation.

The cohesive vision for a divided area is the plan's greatest strength. As a determined effort, it is creating a single, unified vision for Kilburn. The proposal for a "standing Committee" is an excellent, practical step towards achieving it.

The plan has a clear and accessible structure, making navigation easier. The use of policy boxes and project boxes makes it clear what a statutory policy is vs community aspiration. The plan is pragmatic and action oriented. It has a set of policies with a call to action and provides a clear road map for community led initiatives.

The plan effectively demonstrates general conformity with the strategic policies of both Brent, and Camden.

The plan is well designed with achieving sustainable development. It balances social objectives, economic goals and environmental considerations.

Distinction between formal policies and community aspirations is a commendable approach.

My understanding of the plan document has led me to support this well researched, comprehensive, and ambitious Neighbourhood Plan. It provides a clear and compelling vision for the future of Kilburn. It navigates the complexities of tri-borough successfully and sets a strong foundation for a positive future for Kilburn.

Kind regards,

If our neighbourhood were the hands, the different communities in our neighbourhood form its fingers, to create a rich & colourful tapestry of London.

From:
To: [PlanningPolicy; Planning Strategy](#)
Cc: Re: Neighbourhood Plan consultation
Subject: 06 June 2025 14:48:22
Date: [Neighbourhood Plan Council consultation.pdf](#)
Attachments:

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Camden and Brent planning Policy and Strategy Departments Teams , Spatial and Transportation Planning and Paul Lewin

I am writing to you, as a local Kilburn resident and as a representative of the Brent Eleven Streets Residents Association

I and Brent Eleven Streets Residents Association are in FULL SUPPORT of the Kilburn Neighbourhood Plan and look forward to its official instigation in all work carried out within the Kilburn Neighbourhood Planning Boundary

Sincerely

Local Resident
Brent Eleven Streets Residents Association

From: [PlanningPolicy](#)
To: KNPF Consultation 11
Subject:
Date: July 2025 15:51:06

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

I would like to record my strong support for the Draft Kilburn Neighbourhood Plan. It's a convincingly argued and meticulously researched document which takes into account all the major multidimensional concerns which I hear locally expressed. I have watched its slow development and am now more than ever convinced that Plan offers the best and most practical way of improving Kilburn.

Alternate Chair Brondesbury Residents and Tenants (BRAT)
6 Plympton Rd
London
NW6 7EG

Sent from my Galaxy
11 July 2025

From:
To: [PlanningPolic](#)
Subject: yFW: Proposed Kilburn Neighbourhood Plan Consultation
Date: 03 July 2025 14:35:33
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Planning Policy Team,

Thank you for this consultation. As the Regent's Canal is some distance from the Kilburn Neighbourhood Plan area, I can confirm we have no comments to make.

Please let me know if you have any other queries about the Trust or our network.

Kind regards,

Area Planner – London

M

E

Please note that I do not work on Fridays

From:
To: [PlanningPolicy](#)
Subject: Draft Kilburn Neighbourhood Plan - comment
Date: 15 June 2025 10:21:57

Dear Sirs

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

CRASH i(Combined Residents Associations of South Hampstead) is the recognized residents' group for the South Hampstead area. We wish the residents of Kilburn - on both sides of the Camden/Brent border - success in the formulation and approval of their draft plan, but would request one change.

In inspecting the "Area Covered" map we find that the stretch of Belsize Road from its junction with Abbey Road eastwards to its junction with Fairhazel Gardens is included. Having lived on this stretch of Belsize Road some years ago I am aware that locals debated if we lived in South Hampstead or West Hampstead. There was never any suggestion that the area was Kilburn. For us, Kilburn only began when you crossed the 'border' at Abbey Road. This distinction is clearly recognized by Camden by the inclusion of the buildings on the north side of Belsize Road (between the points already mentioned) in the South Hampstead Conservation Area.

We do not consider it appropriate that an area so clearly part of South Hampstead - located in both the Camden's South Hampstead Ward and the South Hampstead Conservation Area - be included in Kilburn, with its corresponding inclusion in the Kilburn Neighbourhood Plan. We would feel, rightly, affronted should the residents of Kilburn be consulted by Camden - and especially by distant Brent - on issues affecting South Hampstead.

Logically, we would argue that the same is also true of the Ainsworth & Alexandra area, but if the residents of that area are happy to be included in Kilburn it's not for us comment for them. The obvious 'border' of the area is the railway line into Euston, not the Belsize Road.

We trust that this small amendment will be recognized and agreed.

Yours faithfully

for CRASH

Vice-Chairman

Hertfordshire and North London Neighbourhood Plan Advice Note

Updated: June 2021

Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This document sets out the key environmental issues, within our remit, which should be considered.

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. This advice note sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/>

Drawing up a neighbourhood plan is a fantastic opportunity to build community resilience to climate change and make the local natural environment better. Opportunities include:

- New green spaces and improvements to public space through new development. This could include planting trees, creating rainwater gardens or enhancing local waterways for water quality and biodiversity.
- Recognising the value of certain environmental features within a plan area, e.g. a floodplain, wetland habitat or rivers. Identify these features and outline how you intend to protect them and improve them.
- Helping a community to manage and adapt to the risk of flooding and climate change by incorporating natural features and green space to manage and store water, and supporting the use of sustainable drainage systems (SuDS).
- Promoting energy and water efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for future occupiers. This will also help reduce unsustainable water consumption and carbon emissions.

We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (<https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies>), and the Thames River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf) as appropriate.

The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.

Infrastructure Delivery

We recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.

Flood risk

Development must be safe and should not increase the risk of flooding.

Neighbourhood Plans should conform to national and local policies on flood risk:

If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations. You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk/>

If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG):

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>.

Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk taking into account climate change. This should be informed by the Environment Agency's Flood Map for Planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.

If the Neighbourhood Plan proposes development in flood risk areas, the Strategic Environmental Assessment should include baseline information about the flood risks, and include it as a key sustainability issue and as an objective.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken. It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at HNLenquiries@environment-agency.gov.uk for further details. In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

Climate Change Allowances

The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change. On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Flood Defences

Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

Thames Estuary 2100 (Tidal Defences)

In line with requirements set out in the Thames Estuary 2100 (TE2100) plan, developments in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use. To request these you should contact our Customers and Engagement Team at hnlquiries@environment-agency.gov.uk.

Ecology and Water Management

Proximity to watercourse/ Ecology

Main rivers can be viewed on the Environment Agency's map:

<https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386>

The neighbourhood plan should draw upon evidence of designated or non-designated sites of nature conservation sites of international, national or local importance, and seek to ensure these sites are safeguarded and there is no degradation to these sites. The mitigation hierarchy of avoid mitigate and compensate should be followed to ensure this.

In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering **biodiversity net gain**. The forthcoming Environment Bill will mandate when enacted the demonstration of a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss. The Neighbourhood Plan could identify opportunities to incorporate requirements for achieving biodiversity and wider environmental net gains.

The provision of green infrastructure, particularly along rivers, can bring about benefits for people and wildlife. Creating networks of green space and habitats can also ensure wildlife are able to migrate and move across sites more easily enabling recovery and resilience of different wildlife species. The Neighbourhood Plan could play a role in helping to preserve, safeguard and establish green buffer zones along rivers by including policies or design guidance for their area. Even where buffer zones do not currently exist it is becoming more vital that we create them not just for the benefit of biodiversity but to reduce flood risk and increase our resilience to climate change.

This is a key way in which we can carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

Neighbourhood Plans provide an opportunity to promote river restoration and enhancements helping us all to achieve the targets to improve waterbodies as part of the Water Framework Directive (WFD). There should be no deterioration in water quality and development should bring about improvements to the ecological status of any water body. Local WFD catchment data for the rivers in your area can be obtained from: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/>. We have identified WFD action measures for specific locations or whole reaches of watercourse (e.g. river bank restoration, improving fish passage, etc) and can be obtained from hnl.enquiries@environment-agency.gov.uk on request.

Objectives to achieve WFD improvements across all sectors are outlined in the Thames River Basin Management Plan (RBMP) (<https://www.gov.uk/search?q=River+Basin+Management+Plans>).

An assessment of the potential impacts of the Neighbourhood Plan on watercourses under WFD should be included within the SEA/SA appraisal, making use of the datasets available above.

Groundwater Quality

Development must not cause pollution to the water environment.

Aquifers and Source Protection Zones

Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

To see if a proposed development is located within a Source Protection Zone, please use our online map: <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

Land Contamination

You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.

You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link:

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198-doe-industry-profiles>

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Your plan may include areas which are located on aquifers and Source Protection Zones. These areas represent the most sensitive and highest risk in terms of potential pollution to protected groundwater supplies, some of which are used for drinking water. These should be considered within your plan if growth or development is proposed here. Further information can be accessed on the following links:

Guiding principles for the Land Contamination

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-for-land-contamination-gplc>

Approach to Groundwater Protection:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf

Water supply and foul drainage

When allocating sites in your Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity. Our [‘Water Stressed Areas – final classification’ 2013](#) explains that our area is seriously water stressed. This is particularly significant as population numbers rise and there are increased impacts from climate change on water resource availability and reliability. The Neighbourhood Plan should consider what further measures could help the local area achieve water sustainability that are not already in the Local Plan, water efficiency standards and measures including the retrofitting of existing buildings.

Surface water drainage

The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and improving water quality.

The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.

We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: <https://www.gov.uk/government/collections/groundwater-protection>

The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Please note

This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site. You should seek your own expert advice in relation to technical matters relevant to your neighbourhood plan before submission.

If you have any questions please contact the Hertfordshire and North London Sustainable Places team: HNL SustainablePlaces@environment-agency.gov.uk

From: [Kilburn Grange Park](#)
To: [PlanningPolicy](#)
Subject: FKGP's comment on Kilburn N"hood Plan Regulation 16 consultation
Date: 11 July 2025 18:42:44

To whoever this may concern.

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Camden Planning,

The Friends of Kilburn Grange Park strongly support the Kilburn Neighbourhood Plan. The plan addresses prominent green assets like Kilburn Grange Park and it's sister Green open space Paddington Old Cemetery. We appreciate the emphasis on integrating and enhancing green spaces.

The plan aims to improve environmental quality, public health, and community well-being which aligns with our constitution. It also focuses on broader green infrastructure across Brent and Camden. We acknowledge and also support one of the key objective of the plan ie., to increase the 'green factor' along Kilburn High Road, which currently lacks greenery. This includes promoting street tree planting and rain gardens.

The plan proposes creating a connected network of green spaces, linking existing parks and micro-parks. A major initiative we also identify is the linear 'Green Corridor' project, connecting Kilburn with West Hampstead and South Hampstead. This corridor will feature new tree-planting, play spaces, and street furniture.

The plan directly links green infrastructure such as our park and sister open space (Paddington Old Cemetery) to addressing critical environmental issues such as air pollution, particularly given Kilburn High Road's designation as an Air Quality Focus Area. It also highlights the role of green infrastructure in managing surface water run-off and mitigating flood risks.

In the document, *Project Box A*, under 'Public Realm Initiatives,' supports the planning and development of toilet facilities and their maintenance, noting that KOVE (a local organization) has particularly identified Kilburn Grange Park as an important and appropriate site for such facilities. This indicates a practical approach to enhancing the usability and accessibility of the park for residents.

Overall, the plan seeks to create a more sustainable, healthier, and aesthetically pleasing environment through comprehensive green space integration. We, the Friends of Kilburn Grange Park and on behalf of the members, support this plan document.

Thank you.

Friends of Kilburn Grange Park

By Email: planningpolicy@camden.gov.uk

Our ref. PL0015447

Planning Policy, Economy, Regeneration and Investment,
London Borough of Camden,
Judd Street,
London, WC1H 9JE

Tel.

30th May 2025

Dear Planning Policy Team

Ref: Submission draft of the Kilburn Neighbourhood Plan

Thank you for inviting Historic England to comment on the Regulation 16 version of the draft Kilburn Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

Historic England reviewed the draft Plan at Regulation 14 stage and offered advice in our letter of 25th January 2024, stating, *There is much to support in this exceptionally clear and concise neighbourhood plan and we are pleased to note the strong emphasis on preserving and enhancing the identity and historic character of the area. In our view, the policies and guidance will help to enhance the historic environment and improve its attractiveness and sustainability. As such, the draft Plan does not raise any issues of concern for Historic England and therefore we do not feel it necessary to comment in detail.* Our full comments are set out in the Statement of Consultation which accompanies the current plan submission.

In our advice we offered a number of suggestions to strengthen or clarify policies in respect of design and the historic environment. Having reviewed the Regulation 16 copy we are happy that this reflects our advice and consider that the Neighbourhood Plan has the potential, if made, to be very beneficial to the future management of the heritage and amenity of the plan area.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely

Historic Places Adviser

London and the South-East Region

Email:

Our Ref: 105181-024

09 July 2025

Camden London Borough Council/ Kilburn Neighbourhood Forum
planningpolicy@camden.gov.uk
via email only

Fisher German LLP
The Estates Office
Norman Court
Ashby de la Zouch
LE65 2UZ

t. 01530 412821
fishergerman.co.uk

Dear Sir /Madam,

Kilburn Neighbourhood Forum Draft Plan Submission May-July Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET.

NGET assets within the Plan area

Following a review of the above Neighbourhood Plan, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

New Infrastructure

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

ngplanning@fishergerman.co.uk

Fisher German LLP
The Estates Office
Ashby de la Zouch
LE65 2UZ

box.landandacquisitions@nationalgrid.com

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

For and on behalf of Fisher German
LLP

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/345326/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk

From:
To: [PlanningPolicy](#); [Planning Strategy](#)
Cc: Kilburn Neighbourhood Plan 2023-2033: Response from KOVE
Subject: 10 July 2025 21:18:26
Date:

Dear colleagues,

I am writing on behalf of KOVE with our comments on the above Plan. We consider the Plan to meet the basic conditions. We are deeply grateful to the vision and persistence of the local residents and advocates who have brought this document forward

Kilburn Older Voices Exchange (KOVE) is a Camden-based association with a significant representation of Brent residents among our membership. We were formed in 2001 and have been actively involved in campaigns and development work to improve the street environment since 2004. Working from the perspective of older people we have made films about accessibility and street safety, road crossings, community seating, public toilets, bus-stops and estate maintenance. We have tried to show the contribution that obstructive, uncongenial and under-planned environments make to ill-health, poor morale and social isolation in later life.

Specific comments on the Plan follow with an extended statement regarding KOVE's purpose, concerns and activities appended below.

WK1 We fully endorse the policy commitment to sustainable materials. The local, relatively modern, historic character of the area should be a major focus of planning concern.

WK1 GREEN BOX We strongly endorse the focus on expanding the public realm in characterful, ecologically-focused and sustainable ways. Kilburn is full of 'dead' microspaces which could be imaginatively reconfigured in collaborative ways but where a need for ongoing maintenance should be taken into account. We strongly favour more attention being given to the dense back streets and side roads. We think this policy focus could go a long way towards creating a new Kilburn character.

Much more imaginative use could be made, following the lead of [name removed] among others, of the course of the River Westbourne, to link up policies on flood relief and the installation of SUDS. It's a shame the recent installation of rain-beds on the High Road was not more convincingly handled.

Project Box A We welcome the policy proposals here for benches and toilets. While we favour the removal of unnecessary street signage we do want to see a huge improvement in way-finding and the communication of directions and purposes by public bodies. The standard of information at bus-stops could provide a baseline for other facilities and services which then need to be attractively grouped. Good information shows that streets are valued places.

Project Box B

We support the idea of a green corridor and favour an approach which recognises, welcomes and encourages the contributions of businesses, home-owners and residents along its route.

Project Box C

We think the improvement of shop-fronts will require investment. We see an opportunity for business/community cooperation over design which could be facilitated through One Kilburn.

WK2 KOVE supports the commitment to mobility hubs and wants to see more encouragement for cycle use and much better managed access to bike hire and EV charging points. We think there should be better designed facilities for delivery drivers both for their welfare and to ensure that their concentrations do not become a nuisance.

CK1 Kilburn needs to become a safer place with a stronger neighbourhood identity shared across public sector, business and community and interlacing the two boroughs.

CK2 We support the better design and development of shop fronts and favour retailers balancing their commercial interest better with civic and community concerns and responsibilities.

CK3 Safer routes and crossing points are vital and the Plan identifies many opportunities to introduce and establish these. Good maps!

We want see a much stronger focus on the needs of pedestrians and bus passengers within cycling and walking strategies. As our 2013 film Getting Around showed older people face exceptional difficulties in and around the High Road. And as our work with Helen Hamlyn Institute PhD candidate [name removed] Fahey showed 'shared space' policies, installations and practices often disadvantage pedestrians (and are not often not much good for cyclists). KOVE favours an interactive public education programme to open up discussion and widen understanding. We are also concerned that traffic-calming measures and related restrictions should not impinge unfairly on disabled drivers or people reliant on access to door-to-door vehicles.

Project Box D

Communicating the purpose of street closures, linking them up and developing them through local engagement will be essential. We welcome the references in the Plan to close working with local people to find solutions and deliver development. We think the collaboration between all parties involved in the Kilburn Grange Psrk Toilets Pilot offers a useful learning point for other such communities of practice.

DK1 We support better use of empty retail frontage but think that a strategic approach to high street renewal is needed to find effective partners to make best use of them.

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DK3 Older people often value markets and the opportunities for social exchange they

present.

DK4 It would be very useful in a planning context to map the existing venues in the area and to carry out an audit of the community services available. We have been concerned that too few residents of the area are fully aware of the extent of local community services. The adoption of a Neighbourhood Plan should make it easier to develop some effective oversight of what is available and what is lacking. A renewed effort to map the ever-changing multi-cultural and steadily shifting age-diversity of Kilburn would be helpful. The difficult operational questions regarding safety and security raised by intergenerational meeting points should be taken into account.

Project Box F We support the proposal for a Standing Committee and would welcome the opportunity to discuss further how it should be constituted and kept representative and responsive and how it should relate to the structures operating within One Kilburn.

At some stage we think the Plan should turn to address the question of housing. We support the delivery of more genuinely affordable housing within mixed use developments. From an older person's perspective we think it is also necessary to look at the condition and accessibility of housing in Kilburn in relation to the Lifetime Homes standards.

KOVE will be discussing this statement further in the months ahead.

We are happy to be called to a hearing.

Kind regards.

Research associate, Kilburn Older Voices Exchange Charity no. 1137417
KOVE

KOVE Supporting statement

We have worked with Camden Council's street planners to significantly improve community seating and held CiL monies from Brent to achieve the same purpose. We have commented extensively over several years on Camden's initiatives to improve Kilburn High Road. We currently hold monies from the Camden CiL to implement a temporary toilet scheme in Kilburn Grange Park for a second year. We engage consistently with community events in both boroughs and advocate for our priorities with the general public on such occasions. Our chair, [name removed], a Camden tenant representative, has been actively involved with KNPF during the last decade. We are named as consulting partners in the Consultation Statement.

We note, first, the ageing of the population in both boroughs, most notably in Brent in the years which set the time-scale for the plan. This is occurring both at and around retirement age (significantly among minority ethnic groups) and also among the oldest old for whom a more accessible environment tends to be paramount.

Kilburn High Road has been a major concern among KOVE participants since we were formed twenty years ago. The heavy traffic, crowded pavements and lack of public realm all contribute. In recent years informal evidence suggests a retreat, a disillusionment with the street among older residents, one affecting all ethnic groups. KOVE members report a decline in general civility - partly countered by the enthusiasm of several businesses to welcome older shoppers to us their toilets - and the presence of people who appear threatening and dangerous. We note too that many of these precarious living people who appear affected by substance misuse and mental distress are themselves in mid and later life and therefore a part of our concern with neglect and the retreat of public services. We have been keen to support KNPF because they recognise the importance of a well-managed and cared-for built

environment to everyone's quality of life. Better planning and engagement from public bodies has the potential to alleviate distress, counter disadvantage and help build longer, healthy lives.

Most recently, we have engaged with Camden Council on questions of air quality and with colleagues in both boroughs regarding the limited access to green open space in Kilburn. The lack of toilets, however, remains a primary concern and our part-time Kilburn and West Hampstead Age-Friendly Development Worker has been largely focused on that issue. Our work on the street regarding toilets brings home not only the burden of their lack for residents (both from need and nuisance) and shoppers but also for commuters and people visiting the area. The advantages to business of properly resourced public toilets has recently been highlighted by the Soho Neighbourhood Forum. We are co-authors of the Toilet Manifesto for London and steering group members of the London Loo Alliance.

KOVE July 10th 2025

[Sent from Yahoo Mail for iPhone](#)

From: [kings gate garden club](#)
To: [PlanningPolicy](#)
Subject: KILBURN NEIGHBOURHOOD PLAN COMMENT
Date: 11 July 2025 20:04:54

Dear

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Upon review of the Kilburn Neighbourhood Plan (2023-2033), there is no explicit mention of "Kingsgate Garden Club." The plan does reference several initiatives and facilities related to the gardening area which is the "Kingsgate" area, particularly on community spaces and greening efforts, which align with the Kingsgate Garden Club's purpose. Our ethos is to protect and mitigate climate change with purposeful gardening activities "for the Neighbourhood, by the neighbourhood, to the neighbourhood." Kingsgate Garden Club supports Kilburn Neighbourhood Plan and its green and open space initiatives.

Thank you,

Kingsgate Garden Club

From: [kingsgate watch](#)
To: [PlanningPolicy](#)
Subject: Regulation 16 comments
Date: 11 July 2025 22:26:54

Dear Planners,

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Kingsgatewatch views the Kilburn Neighbourhood Plan as a significant step towards creating a safer, more vibrant, and cohesive community. We particularly welcome the plan's strong emphasis on designing out crime, improving public spaces, and fostering a coordinated approach to local governance. We believe that with robust implementation and continued collaboration between the councils, the Kilburn Neighbourhood Plan Forum, and local groups like Kingsgatewatch, the plan's vision for a safer Kilburn can be fully realized.

We stand ready to support its objectives and contribute our local expertise to its successful delivery.

Thank you,

Regards,

Kingsgatewatch

'For A Safe & Friendly, Confident & Dynamic Community'

Thanks for sharing this. It's encouraging to see the comments and ideas for taking forward some of the project proposals in the draft plan.

Hopefully we will get the green light very soon and will be in a position to move into action in concert with community and groups etc.

Best wishes

From:

Sent: 10 July 2025 21:16

To: planningpolicy@camden.gov.uk; planningstrategy@brent.gov.uk

Subject: Kilburn Neighbourhood Plan 2023-2033: Response from KOVE

Dear colleagues,

I am writing on behalf of KOVE with our comments on the above Plan. We consider the Plan to meet the basic conditions. We are deeply grateful to the vision and persistence of the local residents and advocates who have brought this document forward

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KOVE will be discussing this statement further in the months ahead.

We are happy to be called to a hearing.

Kind regards.

Research associate, Kilburn Older Voices Exchange Charity no. 1137417

[KOVE](#)

Dear Planning Policy Team,

I am submitting feedback on the draft Kilburn Neighbourhood Plan (2023–2033) with a specific concern regarding Kingsgate Place, a narrow residential street suffering from heavy volumes of through-traffic. This cut-through route is used to bypass congestion on nearby roads and has become a source of ongoing safety, air quality, and noise issues for residents.

I note that Kingsgate Place is briefly mentioned in the Plan, in a general narrative about opportunities to improve pedestrian movement and reduce traffic dominance in that area. However, the Plan does not contain any formal policy, proposal, or commitment to address the well-documented and serious problems caused by this traffic. There are no concrete measures suggested—such as a closure to through-traffic, a filter, or a redesign—nor is the issue acknowledged in the Plan’s project priorities or implementation strategies.

This lack of action is deeply disappointing, particularly given that local residents have raised concerns for years and requested intervention from the Council. The current situation on Kingsgate Place contradicts the Plan’s stated goals of creating a “welcoming” and “pedestrian-friendly” Kilburn.

I urge the Council and the Kilburn Neighbourhood Forum to:

- Include Kingsgate Place as a named priority site for intervention in the Plan;
- Propose a specific, funded traffic management solution such as a modal filter, timed closure, or physical redesign to restrict commuter through-traffic while maintaining resident and service access;
- Include a measurable commitment and timeline for implementation;
- Engage directly with residents of Kingsgate Place during planning and design stages.

This simple residential street is overwhelmed by a problem the Plan claims to care about: traffic dominance, pedestrian danger, and environmental impact. If Kilburn is to be made more liveable, Kingsgate Place must not be left behind.

Thank you for the opportunity to contribute. I hope this concern will be taken seriously in the next iteration of the Neighbourhood Plan.

Yours faithfully,

From: [Webheath TRA](#)
To: [Planning Strategy](#)
Subject: Neighbourhood plan
Date: 17 June 2025 05:49:53

We look forward to the implementation of the Kilburn Neighbourhood plan to establish cross borough co operation,

Webheath TRA

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe