

## Appendix 4. Modifications Proposed to the draft Brent Local Plan October 2019 to be submitted for consideration as part of the Examination

1. This schedule sets out proposed Main and Minor Modifications to the draft Brent Local Plan October 2019 that it is proposed will be submitted for consideration as part of the Examination process to address representations of soundness and other representations on the documents contents, plus other changes considered appropriate to improve the Plan.
2. The proposed Modifications are generally expressed in the form of ~~striketrough~~ for deletions of text and underlined for additions of text and are set out in the same order as the Local Plan.

Main modifications are included in the first schedule. These changes to policy wording. The second schedule contains Proposed Minor Modifications. These are changes to supporting text or factual, grammatical or other changes. A third schedule sets out the Proposed Changes to the Policies Map. A fourth schedule sets out changes to other documents supporting the Local Plan.

### Main Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM1	Good Growth in Brent	Growing the Economy	"a) <u>As a 'provide capacity' borough in the London Plan,</u> make better use of Brent's <del>employment</del> <u>industrial land through a structured approach to deliver industrial</u> <del>its</del> <u>intensification and land release, where appropriate</u> and also where possible support additional housing/ community facilities through co-location".	Response to TfL commercial development representation on the need to recognise Brent's 'Provide Capacity' status.
MM2	Good Growth in Brent	Creating a Healthy Borough	" <u>e) ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough</u> "	Response to Sport England raising the need to include an overarching aim on sports provision.
MM3	BP1	k)	"Intensification and higher residential densities will be supported around Wembley Park Station where it can be demonstrated development would take advantage of the area's good access to public transport."	Response to Quintain re: not appearing to restrict development to only in close proximity to the station.

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MM4	BP1	j)	“Introducing a greater proportion of <del>employment</del> <u>industrial</u> floorspace in new mixed-use developments on Watkin Road and First Way to the east of the Stadium than previously allocated in the Wembley Area Action Plan”	To be consistent with London Plan policy.
MM5	Central/ South West	BCSA1 – 19, BSWSA8 – 12 & 17.	Site allocation policies (BCSA1-19 and BSWSA8-12 and BSWSA17) planning considerations to be amended: <u>“The site is located within the Wembley Opportunity Area and as such London Plan policies on Opportunity Areas are applicable.”</u>	Provide clarity on Wembley Opportunity Area for associated London Plan policies as sought by GLA.
MM6	BCSA1	Planning Considerations	“....will seek no net loss of <del>employment</del> <u>industrial</u> floorspace.....”	To be consistent with London Plan policy.
MM7	BCSA1	Design Considerations	“....to take account of the setting of the opposite Grade 2 Listed former Town Hall, <u>Barn Hill conservation area</u> and not.....”	To reflect designated heritage assets as identified by Historic England.
MM8	BCSA1	Infrastructure Requirements	“ <del>Waste water facilities enhancement</del> <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> ”	Reflective of advice that Thames Water provided in relation to water infrastructure.
MM9	BCSA2	Planning Considerations	“.... <del>The Fountain Studios is a cultural facility, which in the context of Wembley’s identification in the London Plan as a Cultural Area of strategic importance, Brent’s London Borough of Culture 2020 status and the desire to support the evening economy would ideally be replaced with another cultural facility-.....</del> ”	Remove requirement taking account of decision by planning committee to mind to approve an application with no replacement provision as identified by Quintain.
MM10	BCSA2	Infrastructure requirements	“ <del>Waste water facilities enhancement</del> <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will</u>	Reflective of advice that Thames Water provided in

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			<u>need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u>	relation to water infrastructure.
MM11	BCSA3	Planning Considerations	<del>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</del>	Relocated to Infrastructure requirements for consistency.
MM12	BCSA3	Infrastructure requirements	<del>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. ....”</del>	Relocated from planning considerations as more appropriate in this section.
MM13	BCSA4	Indicative Capacity	<del>“Up to 700 500 dwellings (residential and student accommodation). Employment industrial space and hotel space to be confirmed.”</del>	Reflect dwellings reduction due to increased industrial floorspace provision requirements.
MM14	BCSA4	Timeframe for Delivery	0-5 years <del>“200 450”</del> 5-10 years <del>“500 50”</del>	Timescales amended to reflect delivery information provided by the site's owners.
MM15	BCSA4	Planning Considerations	<del>“....will seek no net loss of employment industrial floorspace.....”</del>	To be consistent with London Plan policy.
MM16	BCSA4	Risks	<del>“Existing employment industrial use of the site means that the policy context has changed from when the site was</del>	To be consistent with London Plan policy.

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			allocated in the Wembley Area Action Plan. As such re-provision of <u>employment industrial space</u> "	
MM17	BCSA4	Planning Considerations	<del>"A critical trunk sewer runs through this site which would need to be considered</del> <del>Waste water facilities enhancement</del> Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Reflects information provided by Thames Water and relocation of remainder to Infrastructure requirements.
MM18	BCSA4	Infrastructure requirements	" <u>Waste water facilities enhancement</u> Thames Water has indicated the scale of development is likely to require <u>upgrades to the wastewater network</u> . Thames Water will need to be engaged at the earliest opportunity to agree a <u>housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements</u> . ...."	Relocated from planning considerations as more appropriate in this section.
MM19	BCSA5	Planning Considerations	"...potential CNWL/further/higher education campus. <u>Its town centre location also makes it suitable for office-led mixed-use development.</u> "	Response to representation from GLA that identified office development as appropriate.
MM20	BCSA5	Planning Considerations	<del>"A critical trunk sewer runs through this site which would need to be considered</del> <del>Waste water facilities enhancement</del> Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to	Reflects information provided by Thames Water and relocation of remainder to Infrastructure requirements.

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			<del>the development creating identified additional capacity requirements.</del>	
MM21	BCSA5	Infrastructure requirements	<u>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. ....”</u>	Relocated from planning considerations as more appropriate in this section.
MM22	BCSA6	Indicative Capacity	" Assumed 4000 <u>838</u> dwellings on basis of density of existing permissions prior to more detailed assessment, plus <del>employment</del> <u>industrial</u> floorspace at ground floor."	Align terminology with London Plan and reduction due to methodology of counting student scheme.
MM23	BCSA6	Timeframe for delivery	"0-5 years <del>500</del> <u>342</u> , 5-10 years 350, 10+ years <del>450</del> <u>138</u> "	Reflection of amendment of methodology of converting student scheme to dwellings.
MM24	BCSA6	Planning Considerations	"....loss of existing <del>employment</del> <u>industrial</u> land was considered appropriate in the WAAP, Brent's London Plan 'provide capacity' status for <del>employment</del> <u>industrial</u> means that <del>employment</del> <u>industrial</u> floorspace at least on the ground floor of 0.65 plot ratio...."	Align terminology with London Plan.
MM25	BCSA6	Planning Considerations	"..Development in proximity to the <u>north-eastern part of the site (adjacent to Wembley Business Park)</u> must adopt the 'agent of change'..."	Provides more clarity on the location of agent of change principle being a significant consideration.
MM26	BCSA6	Planning Considerations	<del>“Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a</del>	Relocation to Infrastructure requirements.

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			<del>housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</del>	
MM27	BCSA6	Infrastructure requirements	<u>"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. ...."</u>	Relocated from planning considerations as more appropriate in this section.
MM28	BCSA7	Allocated Use	<del>"Mixed-use residential-led development to include replacement of the existing office space TfL ancillary accommodation"</del>	To reflect need to address TfL needs, rather than requiring general office provision.
MM29	BCSA7	Time Frame for Delivery	0-5 Years " <del>450</del> <u>375</u> " 5-10 years " <del>250</del> <u>100</u> "	Better reflects number of dwellings and their timing of delivery.
MM30	BCSA7	Planning Considerations	<u>"The development should not compromise the ability to add potential platforms at Wembley Park station on the Chiltern Line Aylesbury Branch."</u>	Need to reflect potential within the existing line to provide additional platforms.
MM31	BCSA7	Planning Considerations	<del>"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</del>	Relocation to Infrastructure requirements.
MM32	BCSA7	Design Principles	<del>"Buildings may step up to four or five storeys heights should mediate between the taller buildings on Matthews Close and the character of development along Forty Avenue and</del>	Reduce prescription to provide for justified

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			further to the north, however the northern site is not suitable for tall buildings of a significant scale."	solution at time of planning application.
MM33	BCSA7	Infrastructure requirements	" <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. ....</u> "	Relocated from planning considerations as more appropriate in this section.
MM34	BCSA8	Planning Considerations	"remaining <del>employment</del> <u>industrial</u> floorspace."	Consistency with London Plan.
MM35	BCSA8	Planning Considerations	<del>"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</del>	Relocation to Infrastructure requirements.
MM36	BCSA8	Infrastructure requirements	" <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Relocated from planning considerations as more appropriate in this section.
MM37	BCSA9	Allocated Use	"Residential-led mixed-use development, including student accommodation/education and <del>business</del> <u>industrial.</u> "	Align terminology with London Plan.

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MM38	BCSA9	Indicative capacity	"4200 <u>1262</u> "	Reflects updated understanding of potential delivery
MM39	BCSA9	Time Frame for Delivery	0-5 Years " <u>269</u> " 5-10 years " <u>557</u> " 10+ years " <u>436</u> "	Inserts missing information based on trajectory.
MM40	BCSA9	Planning Considerations	.. <del>It still contains numerous occupied business industrial premises.....</del> and " <del>...maximum re-provision of business industrial uses.....</del> "	Align terminology with London Plan.
MM41	BCSA9	Planning considerations	<u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u>	Reflects protected waste site need for re-provision.
MM42	BCSA9	Planning Considerations	<del>"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</del>	Relocation to Infrastructure requirements.
MM43	BCSA9	Design Principles	"...Where <del>business industrial</del> premises are being provided on-site, the design should support the amenity of both residential and <del>business industrial</del> uses..."	To provide clarity and consistency with London Plan definitions.
MM44	BCSA9	Infrastructure requirements	<u>" Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. ...."</u>	Relocated from planning considerations as more appropriate in this section.
MM45	BCSA9	Justification	"..potentially accommodate <del>business industrial</del> premises...."	Align terminology with London Plan.



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MM46	BCSA10	Planning Considerations	<del>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</del>	Relocated to Infrastructure requirements.
MM47	BCSA10	Infrastructure requirements	<u>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. ....”</u>	Relocated from planning considerations as more appropriate in this section.
MM48	BCSA11	Infrastructure requirements	<u>“Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Reflects advice received from Thames Water.
MM49	BCSA12	Planning Considerations	“means that no-net loss of employment <u>industrial</u> floorspace”	Consistency with London Plan.
MM50	BCSA12	Planning Considerations	<del>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</del>	Relocated to Infrastructure requirements.

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MM51	BCSA12	Infrastructure requirements	<u>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Relocated from planning considerations as more appropriate in this section.
MM52	BCSA12	Justification	“..re-providing employment <u>industrial</u> space...”	Consistency with London Plan.
MM53	BCSA17	All	<del>Southway Motors/Fourway Supplies/ Midnight Motors, South Way, HA9 0HB, 0.33, Repair garages and storage, Business and residential, 60, Re-provision of business floorspace at 0.65 plot ratio required. Ground floor active frontage along South Way.</del>	Removed as conflict with SIL designation where only intensification is allowed.
MM54	BCSA19	Site Area	"0.34"	Measurement provided by TfL commercial development.
MM55	BP2	e)	“...taking account of the need to support additional <u>employment industrial</u> space on site...”	To be consistent with the London Plan.
MM56	BP2	k)	<del>"Securing sufficient physical and social Infrastructure on and off site to support the <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Staples Corner and Neasden Stations' Growth Areas, in particular and ensuring the improvement of the Welsh Harp and its setting.</u></del>	More clarity on range of infrastructure in response to CCG.
MM57	BP2	m)	"Retaining and encouraging intensification of <del>employment</del> B1c, B2 and B8 industrial uses at Kingsbury Locally Significant Industrial Site.	Alignment with the London Plan.

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MM58	BEGA1	Allocated use	"Growth Area - <del>Strategic Industrial Location and Locally Significant Industrial Sites</del> subject...."	Amend to reflect new designation status with regards to SIL.
MM59	BEGA1	Description of site	"The site comprises <del>Strategic Industrial Location and Locally Significant Industrial Sites</del> ....."	Amend to reflect new designation status with regards to SIL.
MM60	BEGA1	Planning Considerations:	"A significant part of the site is <del>Strategic Industrial Land/ Locally Significant Industrial Site</del> ....." and "0.65 for the current <del>SIL and LSIS</del> sites useable <del>employment</del> <u>industrial</u> floorspace....."	Amend to reflect new designation status with regards to SIL and reference industrial to be consistent with the London Plan.
MM61	BEGA1	Planning considerations:	<u>"The masterplanning exercise will be undertaken involving key stakeholders, landowners and developers to help shape its content from conception to completion."</u>	Reference need to include all stakeholders in masterplanning process.
MM62	BEGA1	Planning Considerations:	"Apart from the railway corridors <u>which are Sites of Importance for Nature Conservation (SINC)</u> , there is very little of ecological value...."	Identifies SINC status of part of the site.
MM63	BEGA1	Planning Considerations:	<u>"The presence of an existing active rail aggregate depot to the west plus matters such as the proximity to operational railways and the need to re-provide industrial uses on site needs to be considered to ensure future development proposals do not place unreasonable restrictions on non-residential uses whilst creating a high quality residential environment."</u>	Further consideration of the need to not undermine an adjacent site's function.
MM64	BEGA1	Planning considerations:	<u>"Development around the existing or proposed rail stations and close to infrastructure should take account of operational requirements and the potential need to provide mitigation for any impacts."</u>	To ensure development better considers rail operation as sought by TfL spatial planning.

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MM65	BEGA1	Planning considerations:	" <u>Masterplanning should consider the potential for a future bus/cycle/pedestrian link between Neasden Lane and Great Central Way and if possible allow sufficient space within layout to allow this longer term aspiration to be delivered.</u> "	To ensure development better considers potential for future links as sought by TfL spatial planning.
MM66	BEGA1	Planning considerations	<u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u>	Reflects protected waste site need for re-provision.
MM67	BEGA1	Infrastructure requirements:	" <u>Neasden station has a constrained ticket hall and stairways. TfL has identified that there may be a need to consider station improvements to accommodate development related demand, with associated financial contributions.</u> "	To ensure development better considers limited capacity of station operation currently as sought by TfL spatial planning.
MM68	BEGA1	Infrastructure requirements:	"...space for proposed public transport improvements including the West London Orbital line and station <u>with potential for platforms for up to 8 car-trains...</u> "	To not potentially compromise flexibility for extension of platforms in the future.
MM69	BEGA1	Risks:	"...existing housing sites or <del>employment</del> <u>industrial</u> sites..."	Consistency with the London Plan.
MM70	BEGA1	Design Principles:	"...the area to prosper as an <del>employment</del> <u>industrial</u> location..."	Consistency with the London Plan.
MM71	BEGA1	Justification:	"...low intensity used <del>Strategic Industrial Land</del> and Locally Significant Industrial Sites..."	Reflect LSIS status of industrial sites as shown on policies map.
MM72	BEGA1	Justification:	"...Given Brent's status as a 'provide capacity' borough for <del>employment</del> <u>industrial</u> space in the London Plan, the <del>SIL</del> and LSIS also provide a vital role in meeting future <del>employment</del> <u>industrial</u> needs..."	Reflect London Plan policy and LSIS status of industrial sites as shown on policies map.
MM73	BEGA2	Planning considerations	"...ideally increase useable <del>employment</del> <u>industrial</u> floorspace (predominantly light industrial, industrial and storage and	Provide consistency with London Plan terminology.

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			distribution) representing a 0.65 plot ratio or replacement of the existing amount of <del>employment</del> <u>industrial</u> floorspace..."	
			"...adjacent <del>employment</del> <u>industrial</u> uses will..."	
MM74	BEGA2	Planning considerations	"...Brent Cross West Thameslink station will open in <del>2024</del> <u>2022</u> ..."	Clarification of station opening timescales following funding provision.
MM75	BEGA2	Planning considerations	"...Open Space, <u>Brent Reservoir</u> Site of Special Scientific Interest, Site of...." "...breeding wetland birds. <u>Natural England</u> have also identified, given the ecological status of the area, the need to protect the SSSI particularly with regards to potential disturbance from visitor recreational activities. "	Increase emphasis on SSSI as requested by Natural England.
MM76	BEGA2	Planning Considerations:	" <u>The Council together with TfL will consider the extent to which the area can support car-free development and mitigate impacts through suitable improvements to public transport, active travel and measures to not adversely impact on neighbours' amenity of any potential parking displacement. There is a need to work with TfL and Barnet Council to provide improved links from the site to the proposed new station and wider Brent Cross regeneration area.</u> "	Further reduce car use and ensure residents are not adversely impacted in response to TfL spatial planning.
MM77	BEGA2	Design principles	"...prosper as an <del>employment</del> <u>industrial</u> location."	Provide consistency with London Plan terminology.
MM78	BEGA2	Justification	"...vital role in meeting future <del>employment</del> <u>industrial</u> needs..."	Provide consistency with London Plan terminology.
MM79	BESA1	Allocated Use	"...replacement of the existing <u>B1(c), B2 and B8 floorspace uses</u> and on the McDonalds site <u>A1-A5 and/or B1(c), B2 and B8 employment uses</u> ..."	Bring into alignment with London Plan.
MM80	BESA1	Indicative Capacity:	"..." <del>3886</del> <u>5647</u> sqm <u>B1-B8</u> on the existing <del>employment</del> <u>industrial</u> sites (0.65 plot ratio) and 400 sqm <u>A1-A5</u> "	Bring into alignment with London Plan.

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			uses/B1(c), B2and B8 on the McDonalds..."	
MM81	BESA1	Justification	"...ensure continued provision of <del>employment</del> <u>industrial</u> space, so will seek its retention of <del>employment</del> <u>these</u> uses on site."	Bring into alignment with London Plan.
MM82	BESA2	Indicative capacity:	"10,000 sqm Sui Generis <u>based</u> on the existing <del>employment</del> <u>industrial</u> site's floorspace required to replace bus depot/ create suitable residential environment above, plus 202 dwellings."	Reflects known ownership details.
MM83	BESA2	Ownership:	" <del>Public and</del> Private Sector"	Reflects known ownership details.
MM84	BESA2	Planning considerations	" <del>Any proposal must ensure the replacement of the bus depot or, An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.</del> " <del>if</del> If operationally this is....."	To address bus infrastructure needs as sought by TfL Spatial Planning.
MM85	BESA2	Planning considerations	"...appropriate if the minimum <del>employment</del> <u>industrial</u> floorspace is provided....."	To be consistent with London Plan.
MM86	BESA2	Justification	"...The council needs to ensure continued provision of employment space, so will seek the retention of the bus depot or replacement <del>employment</del> <u>industrial</u> space on this site....."	To be consistent with London Plan.
MM87	BP3	d)	"...taking into account the need to intensify <del>employment</del> <u>industrial</u> use on the site."	To be consistent with London Plan.
MM88	BP3	s)	"...Supporting new and improved <del>employment</del> <u>industrial</u> premises."	To be consistent with London Plan.
MM89	BP3	m)	"m) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development,</u>	More clarity on social infrastructure to be

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			<u>especially the provision of new education, health, cultural and community facilities, notably at Secure sufficient physical and social infrastructure on and off site to support an increase in population at Burnt Oak and Colindale"</u>	provided in response to Brent CCG.
MM90	BNGA1		"...The existing Locally Significant Industrial Sites will be subject to masterplanning with a view to its regeneration to re-provide updated <u>employment industrial</u> floorspace that meets employers existing and future needs, through co-location with other uses....."	Consistency with the London Plan.
MM91	BNSA1	Allocated Use	"Mixed-use development comprising areas of <u>employment industrial</u> intensification and..."	Consistency with the London Plan.
MM92	BNSA1	Existing use	" <u>Transitioning mixed use and a</u> Locally significant industrial site containing a range of uses..."	Clarify existing uses wider than industrial.
MM93	BNSA1	Time scale	"0-5 years <u>44 414</u> "	Typo - delivery to reflect planning permission.
MM94	BNSA1	Indicative Capacity	A future masterplanning process <u>involving site owners/ occupiers and other stakeholders</u> will provide clarity...."	Clarification of engagement as part of the masterplan.
MM95	BNSA1	Description of the site	"...Located to the <u>east of the LSIS within the site allocation</u> is a car dealership and associated <u>servicing workshops, parking/ storage land</u> . A petrol station forms the north <u>eastern western</u> corner."	Reflects wider range of uses on site and accuracy update.
MM96	BNSA1	Planning considerations	"..... <u>impact assessment. Similarly the retention of a retail car dealership function on the Mercedes site is also considered appropriate if required as part of an intensification of floorspace and provision of other allocated uses on that site.</u> "	To provide clarity on the car dealership.
MM97	BNSA1	Planning considerations	"...Locally Significant Industrial Site. <u>The Council considers it appropriate for co-location which will be delivered consistent with London Plan policy E7. The whole....</u> "	Clarify co-location status consistent with London Plan policy.

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MM98	BNSA1	Planning considerations	"....how it can increase useable <del>employment</del> <u>industrial</u> floorspace..."	Clarify for consistency with London Plan policy.
MM99	BNSA1	Design Principles	"...enhance its <u>industrial/employment</u> function...."	Clarify for consistency with London Plan policy.
MM100	BNSA1	Design Principles	"...Access to the site to be considered carefully to ensure no conflict is created between different users <u>and the potential for north-south and east-west pedestrian and cycle connections in particular between Stag Lane and Edgware Road to be enhanced in number and quality...."</u>	Identify increased connectivity principles.
MM101	BNSA1	Policy Justification	".....Furthermore, the intensification/ colocation of the LSIS <u>and Capitol Way Valley with the Burnt Oak and Colindale Growth Area</u> will contribute to meeting the 'provide capacity' status given to Brent within the London Plan. Currently, although the vacancy rates are low, the site is not intensively used and contains a number of two storey buildings that vary in condition. <del>The LSIS</del> Capitol Way Valley also has good access to services and amenities which will support intensification/ co-location."	Consistency with London Plan policy and factual update on access for the allocation.
MM102	BNSA2	Allocated use	"Mixed use development to include residential, retail and <u>employment replacement industrial and office space/affordable workspace.</u> "	Consistency with London Plan and BE2 and BE3.
MM103	BNSA2	Description of Existing Site	"Forming the southern part of the site is a car dealership, <u>servicing centre/workshop</u> and associated car parking."	To identify that the site has some industrial use provision of which will need to be reconsidered to be consistent with the London Plan.
MM104	BNSA2	PTAL rating	The PTAL rating of the site varies from 2- <del>3</del> <u>4</u> . The majority of the northern and southern part is within PTAL rating 2, with the central part achieving PTAL rating <u>3-4</u> .	To reflect PTAL scores as identified through representation received.



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MM105	BNSA2	Planning considerations	<u>"The site contains some existing Local Employment Sites in the form of industrial floorspace related to the servicing of vehicles as part of the car dealership and the office provision of Southon House. Consistent with the borough's provide capacity status in the London Plan the industrial floorspace should be replaced in line with London Plan policy E7. The office space will be subject to Brent policy BE3. As it is out of centre, the site is not a priority location for retail in terms of the sequential test. Nevertheless, the Council is aware that the retail element appears to be trading well, so is likely (subject to other London Plan and Local Plan retail policies) be receptive to re-provision of some retail if it is necessary from a viability perspective to encourage the site's more intensive development that makes for a more efficient use of land."</u>	Clarification of the approach in relation to the existing uses on site.
MM106	BNSA2	Planning considerations	BNSA2 Planning considerations: <del>"Development at this site should avoid having any detrimental impact on the setting of this building."</del>	To reflect the limited weight to be attached to the non-designated heritage asset status of the school.
MM107	BNSA2	Risks	<u>"access to be reconsidered. This may increase costs affecting viability or slow down delivery."</u>	To clarify why access arrangements may be a risk.
MM108	BNSA3	Planning considerations	<del>"...No permissions for non-employment industrial uses within the LSIS will be allowed...."</del>  "...Noise associated with the continued industrial use, or intensification of <del>employment</del> industrial uses on site...."	Consistency with the London Plan.
MM109	BNSA3	Planning considerations	<u>"Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Reflects need to better consider the impact of the railway as sought by TfL spatial planning.

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MM110	BNSA3	Design considerations	"LSIS sites to ensure the area continues to prosper as an <u>employment industrial</u> location."	Consistency with the London Plan.
MM111	BNSA3	Justification	"...the proposed intensification and co-location at these sites will contribute towards meeting future <u>employment industrial</u> needs...."	Consistency with the London Plan.
MM112	BNSA4	Infrastructure Requirements	" <u>Thames Water will need to be engaged at the earliest opportunity to agree an infrastructure phasing plan to ensure essential water infrastructure is delivered prior to being required to meet additional demands created through the development.</u> "	Additional infrastructure requirement as identified by Thames Water.
MM113	BP4	After i)	" <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at As part of the development within the Northwick Park Growth Area where</u> the following improvements to community and cultural facilities should be achieved: ....."	More clarity on social infrastructure to be provided in response to Brent CCG.
MM114	BP4	h)	"Protecting and enhancing playing <u>pitch field</u> provision at....."	Align terminology with national policy as sought by Sport England.
MM115	BP4	h)	"....Claremont High School, <u>John Billam Playing Fields</u> and Tenterden Sports Ground"	Reflects local importance of facilities.
MM116	BNWGA1	Ownership	"Transport for London own <u>Northwick Park station and adjacent railway land.</u> "	Land ownership identified by TfL Spatial Planning.
MM117	BNWGA1	Planning Considerations:	"...A ball strike assessment will be required <u>and any necessary ball stop mitigation implemented prior to the development's impact</u> to ensure that new development does not compromise the role of the MOL in terms of sports provision....."	Strengthen requirement as requested by Sport England

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MM118	BNWSA1	Ownership	BNWSA1 Ownership amend: " <del>Private and small part public ownership</del> "	Status of confirmed ownership.
MM119	BNWSA1	Planning considerations	<u>"If parking is provided it should be made publically available and be designed to serve the wider town centre."</u>	Clarification sought by TfL spatial planning.
MM120	BNWSA1	Planning considerations	<u>"Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Clarification sought by TfL spatial planning.
MM121	BP5	j)	"Co-location of <del>employment</del> <u>industrial</u> and residential uses at Church End Locally Significant Industrial Sites, subject to the requirements in policy BE2."	Consistency with the London Plan.
MM122	BP5	k)	"Retaining and encouraging intensification of <del>employment</del> <u>industrial</u> and residential uses at Brentfield Locally Significant Industrial Site."	Consistency with the London Plan.
MM123	BP5	Before m)	<u>"mi) Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities"</u>	Reflect wider range of social infrastructure as sought by CCG.
MM124	BSGA1		"..The redevelopment of industrial sites for co-location will secure investment in new <del>employment</del> <u>industrial</u> floorspace and improve environmental quality...."	Consistency with the London Plan.
MM125	BSSA1	Allocation	"Mixed-use residential, <del>employment</del> <u>industrial</u> and supporting community facilities"	Reflects better understanding of potential capacity and prior approval.
MM126	BSSA1	Indicative Capacity	" <del>380</del> <u>414</u> "	Reflects better understanding of potential capacity and prior approval.

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MM127	BSSA1	Delivery timeline	0-5 years " <del>34</del> " 6-10 years "24 <u>120</u> " 10+ years " <del>380</del> <u>260</u> "	Reflects minded to approve scheme.
MM128	BSSA1	Planning Considerations	"...It will be subject to a masterplan-led approach, demonstrating comprehensive development will result in a net increase in <del>employment</del> <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM129	BSSA1	Justification	"...to provide increased <del>employment</del> <u>industrial</u> capacity, mixed-use development will be subject to a net increase in <del>employment</del> <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM130	BSSA2	Allocated use	"Housing, <del>employment</del> <u>industrial</u> and supporting community facilities"	Consistency with the London Plan.
MM131	BSSA2	Planning considerations	"..This will demonstrate comprehensive development <u>and</u> will result in a net increase in <del>employment</del> <u>industrial</u> floorspace...."	Consistency with the London Plan.
MM132	BSSA2	Justification	"...to provide increased <del>employment</del> <u>industrial</u> capacity, mixed-use development will be subject to a net increase in <del>employment</del> <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM133	BSSA4	Allocated use	"Mixed-use housing, <del>employment</del> <u>industrial</u> and supporting community facilities"	Consistency with the London Plan.
MM134	BSSA4	Indicative capacity	" <del>200</del> <u>300</u> "	Reconsideration of potential capacity.
MM135	BSSA4	Timeframe for delivery	5-10 years " <u>200</u> " 10+ years " <del>200</del> <u>100</u> ".	Reflects capacity changes and timing.
MM136	BSSA4	Planning considerations	"..in a net increase in <del>employment</del> <u>industrial</u> floorspace...."	Consistency with the London Plan.

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MM137	BSSA4	Justification	"...to provide increased employment <u>industrial</u> capacity, mixed-use development will be subject to a net increase in <u>employment industrial</u> floorspace..."	Consistency with the London Plan.
MM138	BSSA5	Ownership	Amend to: "Public/Private"	Factual update.
MM139	BSSA5	Planning considerations	<u>"An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere."</u>	Clarification sought by TfL spatial planning.
MM140	BSSA5	Infrastructure requirements	<u>"...Thames Water have indicated that currently there are no significant concerns with regards to water supply or waste water capacity for this site. Nevertheless, liaison is encouraged with Thames Water prior to any application to identify whether any upgrades are required as a result of development."</u>	In response to Thames Water.
MM141	BSSA6	Timeline for delivery	"0-5 years 440 <u>569</u> , 5-10 Years 400"	Reflects delivery of existing development proposals.
MM142	BSSA6	Allocated use	"Residential, <u>with potential for</u> affordable workspace, supporting community and cultural uses and small scale retail"	Takes account of uncertainty of extent of delivery on site due to flood zone location.
MM143	BSSA6	Planning considerations	<u>"The site was until recently predominantly in employment use contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit. The London Plan identifies Brent as a 'provide capacity' borough in terms of industrial employment floorspace, and as such provision of some affordable workspace will be sought on site as part of the potential</u>	Reflect policy requirement for additional industrial in the form of workspace to support the 'provide capacity' status.

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			<u>uses associated with a new mixed use community. an</u> <del>increase in employment floorspace will be sought.</del>	
MM144	BSSA6	Planning considerations	"It has a poor public realm which needs to be improved, <u>subject to agreement being reached between the Council and landowners.</u> "	Reflects land for improvements might not be in the ownership of the developers.
MM145	BSSA6	Planning considerations	" <u>The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought.</u> "	Taking account of TfL spatial planning on station capacity.
MM146	BSSA6	Planning considerations	"...Car free development will be encouraged, subject to a Controlled Parking Zone being <del>achieved</del> <u>achievable</u> ..."	Reflects flexibility recognising that the development may be occupied before a CPZ is delivered.
MM147	BSSA7	Planning considerations	" <u>The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought.</u> "	Taking account of TfL spatial planning on station capacity.
MM148	BSSA7	Planning considerations	"...Car free development will be encouraged, subject to a Controlled Parking Zone being <del>achieved</del> <u>achievable</u> ..."	Reflects flexibility recognising that the development may be occupied before a CPZ is delivered.
MM149	BSSA7	Design principles	"...The <u>site has been identified as part of a Tall Buildings Zone.</u> In this context higher density development is appropriate and it is considered that this area is suitable for tall buildings, subject to being of high architectural quality, <del>and</del> <u>providing a high standard of amenity and respecting local character</u> "	Provide clarity with regards to tall buildings on site.

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MM150	BSSA8		Allocated use “Residential and <del>employment</del> <u>industrial</u> ” Comments “Consistent with policy BE3 an increase in <del>employment</del> <u>industrial</u> floorspace will be sought as part of any redevelopment.”	Consistency with the London Plan.
MM151	BSSA9		Comments “Consistent with policy BE3 an increase in <del>employment</del> <u>industrial</u> floorspace will be sought as part of any redevelopment....”.	Consistency with the London Plan.
MM152	BSSA13	Indicative Homes	“ <del>15</del> <u>26</u> ”	Reflects minded to approve scheme.
MM153	BP6	l)	<del>“Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities notably Securing infrastructure in South Kilburn to include a new community space, 3 form of entry primary school and nursery and other community uses.”</del>	Reflect wider range of social infrastructure as sought by CCG.
MM154	BP6	m)	“Enhance and protect playing <u>fields</u> <del> pitches</del> at Gladstone Park and...”	National definition consistency sought by Sport England.
MM155	BP6	q)	“The conversion of vehicle repair premises on Hassop Road to <del>employment</del> <u>industrial</u> uses which improve amenity for neighbouring residential units will be supported...”	Consistency with London Plan.
MM156	BSESA5	Indicative capacity	“ <del>120</del> <u>-50 net (121 gross)</u> ”	Reflects capacity taking account of demolition.
MM157	BSESA5	Timeline for delivery	0-5 years “ <del>20</del> <u>-121</u> ” 6-10 years “ <del>400</del> <u>71</u> ”	Reflects capacity taking account of demolition.
MM158	BSESA8	Indicative capacity	“ <del>202</del> <u>96 net (250 gross)</u> ”	Reflects capacity taking account of demolition.

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MM159	BSESA8	Timeline for delivery	0-5 years " <del>202</del> <u>96</u> "	Reflects capacity taking account of demolition.
MM160	BSESA11	Indicative capacity	<del>40</del> <u>20</u> "	More work done on site capacity.
MM161	BSESA11	Timeline for delivery	0-5 years " <del>40</del> <u>20</u> "	More work done on site capacity.
MM162	BSESA12	Indicative capacity	<del>Unknown</del> <u>-40 net</u> "	Reflects capacity taking account of demolition.
MM163	BSESA12	Timeline for delivery	0-5 years " <del>-40</del> "	Reflects capacity taking account of demolition.
MM164	BSESA12	Infrastructure requirements	<del>"Thames Water will need to be engaged to establish impact on water supply network and water treatment infrastructure at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development prior to the development creating identified additional capacity requirements..."</del>	Advice from Thames Water.
MM165	BSESA16	Infrastructure requirements	<u>"..Thames Water has indicated the scale of development could require upgrades to water supply capacity and is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Advice from Thames Water.
MM166	BSESA18	Planning considerations	"Policy B6 ( <del>p-g</del> ) promotes the conversion of premises on Hassop Road to <del>employment</del> <u>industrial</u> uses which improve amenity for neighbouring residential <del>units</del> <u>properties</u> ."  " <del>...as such, an increase in employment</del> <u>industrial</u> floorspace will be required..."	Consistency between Local Plan policies and also London Plan.
MM167	BSESA18	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network."</u>	Advice from Thames Water.



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			<u>Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u>	
MM168	BSESA18	Justification	"...As such, an increase in <del>employment</del> <u>industrial</u> floorspace will be sought..."	Consistency with London Plan.
MM169	BSESA21	Existing use	"Supermarket, car parking and an <del>employment</del> <u>industrial</u> use"	Consistency with London Plan.
MM170	BSESA21	Allocated use	"Mixed-use including housing, retail and <del>employment</del> <u>industrial</u> uses"	Consistency with London Plan.
MM171	BSESA21	Planning considerations	"...An increase in <del>employment</del> <u>industrial</u> floorspace will be required as part of any redevelopment...."	Consistency with London Plan.
MM172	BSESA21	Justification	"...The site contains an existing <del>employment</del> <u>industrial</u> use. The draft London Plan requires Brent to provide additional <del>employment</del> <u>industrial</u> floorspace capacity. As such an increase in <del>employment</del> <u>industrial</u> floorspace will be sought. Retention of <del>employment</del> <u>industrial</u> floorspace in this location..."	Consistency with London Plan.
MM173	BSESA22		Indicative homes " <del>20 42</del> " Comments " <del>17/0322 pending decision</del> <u>minded to approve</u> "	To reflect planning decision.
MM174	BSESA25		Indicative homes " <del>50 70</del> " Comments " <del>17/5291 allowed at appeal</del> "	To reflect planning permission.
MM175	BSESA28		Allocated use: Mixed-use <del>employment</del> <u>industrial</u> and residential	To reflect planning permission.

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MM176	BSESA34	Indicative homes	" <del>Unknown</del> <u>20</u> "	Estimate of capacity based on size and context.
MM177	BSESA35		Allocated use: " Residential and <del>employment in the b-use class</del> <u>industrial</u> Comments: "An uplift in <del>employment</del> <u>industrial</u> floorspace will be required as part of any redevelopment."	Consistency with the London Plan.
MM178	BP7	b)	"Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton <del>and in intensification corridors.</del> <u>and</u> In the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road <del>buildings where</del> <u>around 15 metres (5-storeys) could be appropriate and in Sudbury and Ealing Road town centres where buildings around 15-18 metres (5-6 storeys) could be appropriate.</u> "	Clarification in relation to St George representation.
MM179	BP7	j)	"Introducing mixed-use development to <del>employment</del> <u>industrial</u> sites around the junction of Ealing Road and Bridgewater Road..."	Consistency with the London Plan.
MM180	BSWGA1		"The area will be a location for taller buildings at its Ealing Road and Northfields ends, with principally mid-rise in between."	Increase emphasis.
MM181	BSWSA1	Planning considerations	"there must be at a minimum replacement of the existing amount of <del>employment</del> <u>industrial</u> floorspace or 0.65 plot ratio, whichever is the greater across the sites. The configuration of <del>employment</del> <u>industrial</u> floorspace will be agreed as part of the forthcoming masterplan process..."	Consistency with the London Plan.
MM182	BSWSA1	Planning considerations	" <u>An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere. Development close to the rail station and rail infrastructure will need to</u>	Taking account of TfL spatial planning position.

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			<u>take into account operational requirements and the potential need to provide mitigation for any impacts. Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u>	
MM183	BSWSA1	Planning considerations	<del>“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</del>	Placed in Infrastructure Requirements for consistency.
MM184	BSWSA1	Infrastructure requirements	<u>“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Moved from planning considerations for consistency.
MM185	BSWSA1	Justification	<del>“...as well as increasing provision of <u>employment industrial</u> floorspace in line with London Plan requirements....”</del>	Consistency with the London Plan.
MM186	BSWSA2	Planning considerations	<u>“The use of Glacier Way as a TfL bus stand will also need be taken into account. This must be retained or enhanced as part of any development and early discussion with TfL London Buses on this is should take place.”</u>	Taking account of TfL spatial planning advice.
MM187	BSWSA2	Planning considerations	<del>“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest</del>	Placed in Infrastructure Requirements for consistency.

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			opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	
MM188	BSWSA2	Infrastructure requirements	Amend policy to: " <del>No specific infrastructure requirements identified beyond</del> <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> "	Taking account of TfL spatial planning advice.
MM189	BSWSA2	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM190	BSWSA3	Planning considerations	<u>"Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Taking account of TfL spatial planning advice.
MM191	BSWSA3	Planning considerations	<del>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</del>	Placed in Infrastructure Requirements for consistency.
MM192	BSWSA3	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative</u>	Taking account of TfL spatial planning advice.

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			<u>impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u>	
MM193	BSWSA3	Infrastructure requirements	<u>“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Moved from planning considerations for consistency.
MM194	BSWSA4	Allocated use	“Mixed-use residential led development incorporating some replacement <del>workspace</del> <u>industrial</u> at ground floor level and potential commercial leisure use to take advantage of/ enhance the canal setting.”	Consistency with the London Plan.
MM195	BSWSA4	Planning considerations	“Given that the site is existing <del>employment</del> <u>industrial</u> land and Brent’s status as a provide capacity borough, the council will require no net loss of <del>employment</del> <u>industrial</u> floorspace.”	Consistency with the London Plan.
MM196	BSWSA4	Planning considerations	<del>“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</del>	Placed in Infrastructure Requirements for consistency.
MM197	BSWSA4	Planning considerations	<u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u>	Reflects protected waste site need for re-provision.
MM198	BSWSA4	Infrastructure requirements	<u>“Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station</u>	TfL Spatial Planning advice.

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			<u>that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> "	
MM199	BSWSA4	Infrastructure requirements	" <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Moved from planning considerations for consistency.
MM200	BSWSA4	Justification	"..The site's proximity to Alperton Station make it an excellent location for mixed residential and <u>employment industrial</u> use.	Consistency with the London Plan.
MM201	BSWSA5	Allocated use	"Mixed-use residential led development incorporating some replacement <u>employment industrial</u> space, small scale retailing / commercial leisure and community use (e.g. nursery)"	Consistency with the London Plan.
MM202	BSWSA5	Indicative Capacity	" <del>590</del> <u>490</u> "	Reduced due to need to provide more industrial space.
MM203	BSWSA5	Timeline for delivery	0-5 years " <del>300</del> <u>50</u> " 6-10 years " <del>290</del> <u>400</u> " 10+ years " <u>50</u> "	Takes account of need to address different landownerships.
MM204	BSWSA5	Planning considerations	"Given that the site is existing <u>employment industrial</u> land and Brent's status as a provide capacity borough, some re-provision of <u>employment industrial</u> floorspace..."	Consistency with the London Plan.

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MM205	BSWSA5	Planning considerations	" <del>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</del> "	Placed in Infrastructure Requirements for consistency.
MM206	BSWSA5	Planning considerations	"... <u>A Thames Water Sewage Pumping Station is located within the proposed development boundary and this is contrary to best practice set out in Sewers for Adoption (7th edition). The development should make suitable arrangements to address this matter satisfactorily and dependent on solutions devised, future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise.</u> "	Advice from Thames Water.
MM207	BSWSA5	Infrastructure requirements	" <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Moved from planning considerations for consistency.
MM208	BSWSA5	Infrastructure requirements	" <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> "	Taking account of TfL spatial planning advice.
MM209	BSWSA6	Allocated Use	"Mixed-use residential-led development incorporating <u>employment industrial uses.</u> "	Align terminology with London Plan.

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MM210	BSWSA6	Indicative Capacity	" <del>135</del> <u>147</u> "	Takes account of further capacity assessment work.
MM211	BSWSA6	Delivery timeline	0-5 years " <del>135</del> <u>43</u> " 6-10 years " <u>104</u> "	Takes account of further capacity assessment and timing.
MM212	BSWSA6	Planning considerations	"Given that the site is existing <del>employment</del> <u>industrial</u> land and Brent's status as a provide capacity borough, no net loss and re-provision of <del>employment</del> <u>industrial</u> floorspace...."	Consistency with London Plan.
MM213	BSWSA6	Planning considerations	" <del>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</del> "	Placed in Infrastructure Requirements for consistency.
MM214	BSWSA6	Infrastructure requirements	" <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> "	Advice from TfL Spatial Planning.
MM215	BSWSA6	Infrastructure requirements	" <u>Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Advice from Thames Water.
MM216	BSWSA7	Existing Use	" <u>Mixed-use (Industrial with residential under construction)</u> "	Update in accordance with extant permission.
MM217	BSWSA7	Indicative Capacity	" <del>2900</del> <u>3,030</u> new homes"	Update in accordance with extant permission.



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MM218	BSWSA7	Site Description	"The majority of the site (with the exception of a small area at the north-west) was part of the Park Royal Strategic Industrial Location (SIL) <del>as designated by the London Plan.</del> The north-west part <del>was formerly that is not SIL land</del> is a non-designated Local Employment Site."	Update in accordance with extant permission.
MM219	BSWSA7	Planning History	"Approved <del>hybrid planning permission application 18/0321</del> <u>is a hybrid application as amended by permission 19/2732</u> for the comprehensive mixed-use redevelopment of the <u>former Northfields Industrial Estate.</u> The scheme proposes demolition of all existing buildings on site and the delivery of a development including <del>2,900</del> <u>3030</u> homes..."	Update in accordance with extant permission.
MM220	BSWSA7	Planning Considerations	Consistent with planning permission 18/0321 due to the site's historic SIL designation a minimum of 17,581 sq.m. of employment floorspace <u>of the typology and affordability associated with that planning permission</u> must be re-provided as part of the development. <u>Due to Brent's classification as a 'provide capacity' borough, should the opportunity arise, for example through co-location north of the river Brent or through intensification to the south, greater provision of industrial floorspace will be supported.</u>	The site through its planning permission 18/0321 consistent with Policy DMP14 was considered appropriate for release from SIL, on the basis that a minimum provision of employment space would be delivered as part of the development. The amended policy, together with BE2 and the policies map identifying SIL boundaries provides clarity that subject to a minimum amount of employment floorspace being re-provided, the principle of the use of the site north of

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
				the river Brent for residential does not need to be re-tested against policies that would apply to SIL.
MM221	BSWSA7	Planning considerations	<del>“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</del>	Placed in Infrastructure Requirements for consistency.
MM222	BSWSA7	Design Principles	"The scale and massing should be sympathetic to existing heights in the surrounding context with lower building heights closer to Beresford Avenue. <u>Tall buildings are appropriate on this site consistent with the heights parameters established by planning permission 18/0321 (as amended by application 19/2732).</u> ..."	Update in accordance with extant permission.
MM223	BSWSA7	Infrastructure requirements	<u>“Contributions to improve the bus network, Stonebridge Park station and surrounding walking/cycling routes to mitigate the impact of the development on the surrounding movement network.”</u>	Advice from TfL Spatial Planning.
MM224	BSWSA7	Infrastructure requirements	<u>“Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Moved from planning considerations for consistency with other policies.
MM225	BSWSA7	Justification.	BSWSA7 justification amend: "...2900 <u>3030</u> homes..."  “... <u>employment industrial</u> ...”	Update in accordance with extant permission.

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MM226	BSWSA8	Planning considerations	<u>"Development close to rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Advice from TfL Spatial Planning
MM227	BSWSA8	Planning considerations	<del>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</del>	Placed in Infrastructure Requirements for consistency
MM228	BSWSA8	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM229	BSWSA8	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Stonebridge Park station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the vicinity of the station."</u>	Advice from TfL Spatial Planning.
MM230	BSWSA9	Planning considerations	<del>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</del>	Placed in Infrastructure Requirements for consistency.

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MM231	BSWSA9	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM232	BSWSA10	Planning Considerations	"...The loss of the garage means that employment use should be re-provided through a net increase in <del>employment</del> <u>industrial floor space...</u> "	Consistency with the London Plan.
MM233	BSWSA10	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Thames Water advice.
MM234	BSWSA12	Indicative Homes	" <del>24</del> <u>22</u> "	Reflects minded to approve scheme.
MM235	BSWSA15	Indicative Homes	" <del>28</del> <u>36</u> "	Reflects minded to approve scheme.
MM236	BSWSA16	Indicative Capacity	" <del>80</del> <u>120</u> "	Better reflects potential.
MM237	BSWSA17	Indicative Capacity	" <del>150</del> <u>170</u> "	Reflects minded to approve scheme.
MM238	Design	BD3	<u>"g) Be protected from sewer flooding by a suitable pumped device."</u>	Adapt to potential risk of basement flooding.
MM239	Housing	BH1	Amend BH1 to "...to provide a minimum <del>27,482</del> <u>23,250</u> homes in the period 2019/20-2028/29. It will positively	Align with London Plan requirements in early

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			plan to promote a further minimum of <del>48,074</del> <u>21,595</u> homes from 2029/30 to the end of the Plan period in 2041....."	years and take account of updated trajectory.
MM240	Housing	BH2	"...edge of town centre sites, <u>areas with higher levels of public transport accessibility levels</u> , and intensification..."	Align with London Plan.
MM241	Housing	BH2	" <u>a) the site is allocated or has planning permission for an alternative use(s);</u> <del>a) b)</del> there is no need for it or reasonable prospect of its use if provided; or <del>b) c)</del> in exceptional cases that its loss is outweighed by the benefits that its replacement with residential floorspace will bring."	Clarify status of existing permissions in relation to policy.
MM242	Housing	BH3	" <u>The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent. To encourage...</u> "	Align policy with the London Plan.
MM243	Housing	BH4	POLICY BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT <del>Planning Permission for Small Sites will be determined in accordance with London Plan Policy H2A with the exception of:</del> <del>Criterion A2, which in Brent will only apply within PTAL 3-6 locations</del>  <u>Small housing developments (below 0.25 hectares or 25 dwellings in size) delivering a net addition of self-contained dwellings through the more intensive and efficient use of sites, where consistent with other policies in the development plan, will be supported within the priority locations of PTAL 3-6, intensification corridors, or a town centre boundary through:</u> a) <u>the infill of vacant or underused brownfield sites,</u>	More detailed policy and policy justification given that policy H2A has been removed from the Intend to Publish version of the London Plan.

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			<p>b) <u>residential conversions, redevelopment, extensions of dwellings, or infill within the curtilage of a dwelling</u></p> <p>c) <u>the redevelopment of flats, non-residential buildings and residential garages.</u></p> <p>d) <u>upward extensions of flats and non-residential buildings</u></p> <p><u>In these priority locations, the character of the existing area will be subject to change over the Local Plan period. Outside the priority locations greater weight will be placed on the existing character of the area, access to public transport and a variety of social infrastructure easy accessible on foot when determining the intensity of development appropriate.</u></p> <p><u>Developments that demonstrably fail to optimise potential housing delivery on a site or prejudice more comprehensive development, particularly that of a site allocation, will be refused.</u></p> <p><u>All minor residential developments (less than 10 dwellings) are required to deliver an Urban Greening Factor of 0.4 on site.</u></p> <p><del>6.2.39 The London Plan sets ambitious targets for small site development across London on the basis of the content of Policy H2 Small Sites and Policy H2A Small Housing Developments. The council is positive about the extent to which small sites can contribute towards meeting housing needs. It anticipates delivery of about 370 dwellings per year. In relation to Policy H2 and Policy H2A the council has in the Local Plan identified town centre boundaries and main movement/ public transport corridors (known as intensification corridors) as principal areas where it considers the most obvious potential exists.</del></p> <p><del>6.2.40 As an outer London borough Brent has comparatively high car dependency rates for journeys,</del></p>	

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			<p>particularly north of the North Circular Road. Some tube and railway stations are located in town centres, some however are not and otherwise have a poor level of access to viable public transport alternatives, employment and retail/ other facilities to meet every day needs away from the immediate vicinity of these stations. London Plan policy H2A's 800 metre buffer around town centres and underground/ railway stations also takes no account of the quality of the physical links to those centres or the quality of public transport service there. A large site development might be able to address these through contributions to improve links or public transport improvements/ contributions to provision of controlled parking zones. Small developments however usually are not subject to S106 and provide limited Community Infrastructure Levy funds which are therefore unlikely to be able to satisfactorily address such shortcomings. In addition, the percentage of residents that use the train/ underground as their main/ only mode of transport is very limited.</p> <p><del>6.2.41 As such the council considers that London Plan Policy H2A needs some refinement to take account of Brent circumstances. In areas where small scale development is likely to encourage high levels of car dependency it could undermine other objectives, such as reducing travel by car, improving air quality, maintaining quality of life of existing residents and impacting business efficiency related to movement of goods. As such in Brent criterion A2 has been amended to only apply where there are genuine reasonable public transport alternatives that could realistically encourage people to not own/ use a car on a frequent basis.</del></p> <p><u>6.2.39 The London Plan in Policy H2 Small Sites identifies that for London to deliver more of its housing; a substantial contribution from smaller sites below 0.25 hectares in size</u></p>	

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			<p><u>will be required. It sets a minimum target of 4,330 for the period 2019/20 - 2028/29 from this source. Consistent with the London Plan, the Council wants to encourage the development of small sites and provide a positive environment for small site developments in areas with good access to public transport and local services.</u></p> <p><u>6.2.40 The policy identifies the types of the developments considered likely to be appropriate and the priority locations for these types of developments. The areas are likely to be some of the better served by public transport and thus more sustainable, in terms of reducing reliance on the private car with its associated impacts, such as air quality. The Council accepts that priority locations that are not identified as designated heritage assets or areas of distinctive residential character are likely to be subject to substantial change in character over the Plan period. Whilst character will change, the Council will still expect high quality development.</u></p> <p><u>6.2.41a Developments are likely to be within close proximity to existing homes. They should therefore be carefully and creatively designed, to avoid for example an unacceptable level of harm to neighbours' and occupants' amenity. Building design and the placement of windows and the use of landscaping can positively address privacy matters and ensure homes benefit from satisfactory levels of daylight and sunlight. In addition to design guidance for small housing sites that the Mayor will produce, the Council is also likely to adopt its own guidance to reflect Brent's characteristics.</u></p> <p><u>6.2.41b Although it is likely that opportunities will exist outside the priority locations for small sites development, the intensity of development allowed is likely to be less. This is likely to be as a result of the existing character of</u></p>	



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			<p><u>those areas, which as they are not priority areas for development is not expected to significantly change. In addition the extent to which public transport and access to social facilities is within walking distance will also be considered. The poorer the access, the less intense the acceptable development is likely to be. In order to maximise the potential of all sites within the borough, small housing developments will not be acceptable where they fail to optimise potential housing delivery or prejudice the more comprehensive development of a wider site allocation.</u></p> <p><u>6.2.41c The open, green quality of the suburban environment was part of Brent's historical appeal. Over time, intensification of building coverage and hard landscaping, principally to accommodate cars, has reduced incidental green infrastructure. This has not only affected the visual quality of the environment, but has also bio-diversity, urban temperatures, air quality, and the volume and speed of surface water run-off, together with water quality. Small site development without some form of safeguards could well intensify these matters. Application of the urban greening factor to minor developments will assist in better addressing these matters, making up for the loss of green infrastructure where this might be lost, or supporting its re-introduction where sites may now have none. As such, delivery of green infrastructure on site consistent with an Urban Greening Factor of 0.4 will be sought on site with London Plan Policy G5 Urban Greening applying to minor developments (under 10 dwellings).</u></p> <p>LONDON PLAN  Policy H2 Small Sites  Policy H2A Small Housing Developments  Policy G5 Urban Greening  Policy D7 Accessible Housing</p>	

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MM244	Housing	BH5	"...in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing..."	Improve clarity of alignment with London Plan.
MM245	Housing	BH5	"Build to Rent developments, <del>a minimum of 100 per cent at London Living Rent</del> <u>equivalent rents or lower</u> ."	Improve policy clarity.
MM246	Housing	BH8	"..benchmark housing provision <del>target figure</del> ..."	London Plan figures are a benchmark figure, not a target.
MM247	Economy and Town Centres	BE1	".... <u>Further and higher educational provision</u> <del>quarters</del> at Northwick Park and Wembley will be protected and enhanced."	Provides greater clarity as final location of CNWL not yet known.
MM248	Economy and Town Centres	BE2	"Within SIL and LSIS development will be supported where it intensifies <del>employment</del> <u>industrial</u> uses and accords with the principles as follows..."  "Employment <u>Industrial Site</u> "	Align with London Plan policy.
MM249	Economy and Town Centres	BE2	"..These sites will be protected for solely <u>industrial uses as defined in London Plan policy E4 Land for industry, logistics and services to support London's economic function</u> <del>Criterion A. employment uses within use class B1c, B2, B8 and closely related sui generis uses.</del> Development will be supported which increases the amount of <u>employment industrial floorspace in these use classes</u> , including start-up space, move on space. Any loss or reduction in floorspace will be resisted...."	Align with London Plan policy.
MM250	Economy and Town Centres	BE2	".....A net increase in <u>employment industrial</u> floorspace; a mix of B1(b), B1(c), B2 and B8 <del>employment</del> floorspace will be...."	Align with London Plan policy.
MM251	Economy and Town Centres	BE2	Northfields ( <u>east and west</u> of Grand Union Canal)	Northfields east of the Grand Union Canal and

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				north of the River Brent is to be removed as a SIL designation on the policies map due to planning permission 18/0321. The remainder of the eastern site to the south of the River Brent is to be retained as SIL, which consistent with London Plan policy is regarded as appropriate for intensification.
MM252	Economy and Town Centres	BE2	<del>"Northfields (east of Grand Union Canal) SIL Co-location within site boundary of extant planning permission subject to as a minimum providing the amount, typology, and affordability of employment floorspace consistent with planning permission 18/0321. Intensification on the remainder of the SIL."</del>	The principle of development of Northfields east of the Grand Union Canal and north of the river Brent for primarily residential purposes with some employment uses on site has been considered appropriate consistent with policy DMP14 in planning permission 18/0321. The site allocation BSWSA7 makes it clear that development of that site for residential is subject to a minimum amount of employment/ industrial floorspace being provided.
MM253	Economy and Town Centres	BE3	<u>"The Council will require the retention of and where possible the intensification of Local Employment Sites in industrial</u>	Promote potential for intensification as a starting

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			<p><u>use</u>. The council will allow the <u>release development</u> of Local Employment Sites <del>to</del> <u>for</u> non-employment uses where:</p> <p>a) continued wholly employment use is unviable; or</p> <p>b) development increases the amount of <u>workspace as well as retaining the existing employment use or provides that additional workspace as</u> affordable workspace in the B use class, with makerspace in use class B1(c) prioritised to meet demand.</p> <p><u>Where criterion a) is being used to justify the release, the maximum viable replacement of the existing employment floorspace will be sought.</u></p>	point, whilst emphasising potential for other uses if required.
MM254	Green Infrastructure	BG11	"...Major <u>residential</u> developments outside Growth Areas will be expected to provide 0.81 sqm of public open space per resident in the following manner..."	Clarify relevant use as sought by DfE.
MM255	Sustainable Infrastructure	BSUI3	"...surface water flooding. <u>Proposed development must pass the sequential and exceptions test as required by national policy.</u> The design and layout..."	Reference need for sequential test on flooding as sought by Environment Agency.
MM256	Transport	BT2	"c) )....in line with or exceeding <u>London Plan standards and TfL and WestTrans design standards...</u> "	In response to TfL, reference to London Plan.
MM257	Transport	BT3	"Development that would generate significant movement of goods or materials, both during construction and in operation, should minimise the movement of goods and materials by road. <u>Freight consolidation through maximising the use of the capacity of vehicles entering and exiting a site and the use of more sustainable alternatives, i.e.by rail and canal, and pursuit of best practice in technical innovation to consolidate delivery and construction transport is encouraged.</u> "	Reflects comments made by TfL Spatial Planning and OPDC.

## Minor Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM1	Introduction		" <u>There will be a need to consider updates to national and London level policy and guidance after the Brent Local Plan is adopted. These might be substantial material considerations that alter the weight that can be applied to policies in the Plan when determining planning applications. Reference to these will be made in the respective reports associated with the determination of planning applications</u> "	Requirement to consider updated policy at national or regional level once Local Plan has been adopted.
MiM2	Introduction	Figure 3	Amend to provide greater clarity on tiers of planning policy.	Greater clarity
MiM3	Introduction	2.4	" <del>..has</del> <u>have</u> .."	Grammar
MiM4	Brent's Characteristics	3.17	" <u>.....medium term. However, to support new residential development, current projections indicate a new primary school will be required in Wembley Park by 2023.</u> "	Reflecting need for school on the York House site and timing.
MiM5	Brent's Characteristics	3.19	In terms of indoor sports facilities, <u>the Council's Indoor Sports and Leisure Needs Assessment identified provision is significantly below needs. Swimming pools are between ¼-½ of the provision per head of population in adjacent boroughs. There is also the need for additional sports halls. The Council's Playing Pitch assessment identified that for some sports, additional pitches are required.</u> This under provision is partly reflected by the levels of sports participation and physical activity across the borough.	Reference to evidence based documents as advised by Sport England.
MiM6	Brent's Characteristics	3.28	Identify footnote 17 associated with the text "as with the provision of indoor facilities" Footnote 17 is " <u>Brent Council Indoor Sports and Leisure Facilities Needs Assessment November 2018</u> " Identify footnote 18 associated with the text "the provision of outdoor sports facilities" Footnote 18 is "A	Reference to evidence based documents as advised by Sport England.

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			<u>Strategic Approach to Playing Provision in Brent December 2016</u> "	
MiM7	Brent's Characteristics	3.32	"...Its <u>will be used</u> as the boundary of the extended Ultra-Low Emissions Zone ( <u>UZEL</u> ) to be introduced in 2021 <del>is unclear in terms potential changes on these adverse impacts.</del> <u>Transport for London predict that the ULEZ 2021 will reduce air pollution in Brent by NO2 by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular.</u> "	More certainty on impacts has been identified by TfL.
MiM8	Brent's Characteristics	3.33	Strategic transport improvements will occur adjacent to the borough at Old Oak with the provision of a HS2/ <del>Crossrail</del> <u>Elizabeth Line</u> interchange station (2026), a new station at Brent Cross West Thameslink (2023) and potentially the West London Orbital with <del>an</del> additional stations at <u>Harlesden and Neasden</u> (2026).	To reflect name change and potential additional stations.
MiM9	Development Vision and Good Growth in Brent	How Will Good Growth be Delivered?	" <u>1</u> Strong and Inclusive Communities" " <u>2</u> Making the Best Use of Land" " <u>3</u> Creating a Healthy Borough" " <u>4</u> Growing a Good Economy" " <u>5</u> Increasing Efficiency and Resilience" " <u>6</u> Delivering the Homes to Meet Brent's Needs"	To provide clarity for referencing purposes.
MiM10	Places	All figures "High Level Plan of the Place Vision"	Include town centre boundaries if this does not reduce the effectiveness of the drawing.	Increase mapped information.
MiM11	Places	All figures "High Level Plan of the Place Vision"	Include Growth Area boundaries if this does not reduce the effectiveness of the drawing.	Increase mapped information.
MiM12	Places	All figures "High Level Plan of the Place Vision"	Include some street names to assist with orientation.	Increase legibility.

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MiM13	Places	All figures “High Level Plan of the Place Vision”	"High Level Plan of the Place. <u>More detailed boundaries can be seen on the Policies Map</u> "	To make it clear that relevant policy designation boundaries can be more easily viewed on the policies map.
MiM14	Central	5.1.22	"...whilst also incorporating more <del>employment</del> <u>industrial</u> floorspace now that Brent...."	To be consistent with London Plan policy.
MiM15	Central	5.1.29	"...by incorporating ground floor <del>employment</del> <u>industrial</u> uses,"	To be consistent with London Plan policy.
MiM16	Central	5.1.33	"...The provision of Boxpark, Troubadour theatre ( <u>meanwhile uses</u> ) plus the development of Plot W12 ...."	Acknowledge meanwhile status.
MiM17	Central	5.1.40	"Wembley Growth Area <u>is the Wembley Opportunity Area, as designated in the London Plan. Its designation as an Opportunity Area means that its growth is of strategic importance to the whole of London. It covers an extensive element of the ...</u> "	Acknowledge spatial designation in the London Plan.
MiM18	East		All paragraphs should start 5.2 as opposed to 5.1 as this is chapter 5.2	Correction
MiM19	East	5.2.10	" <del>Employment</del> <u>Industrial</u> space that meets 21 <sup>st</sup> century needs..."	To be consistent with London Plan policy.
MiM20	East	5.2.16	"The proposed Growth Areas of Staples Corner and Neasden Stations will provide the opportunities for new mixed use communities with a significant amount of <del>employment</del> <u>industrial</u> and residential floorspace. A masterplanning exercise will be undertaken <u>involving key stakeholders, landowners and developers to help shape the masterplan from conception to completion. This will</u> <del>te-</del> identify the appropriate mix of uses and form of	Clarify engagement in masterplanning process. Consistency with London Plan.

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			development with a view to improving employment opportunities as well as homes.	
MiM21	East	5.2.17	"...at a minimum replace, but ideally intensify <del>employment</del> <u>industrial</u> uses too...."	Consistency with the London Plan.
MiM22	East	5.2.23	"....This will not be at the expense of <del>employment</del> <u>industrial</u> space...."	Consistency with the London Plan.
MiM23	East	5.2.24	"....larger scale <del>employment</del> <u>industrial</u> uses with residential...."	Consistency with the London Plan.
MiM24	East	5.2.25	"The Kingsbury <del>employment</del> <u>industrial</u> area retains principally clearly defined boundaries, with very little encroachment from non <del>employment</del> <u>industrial</u> uses. Exceptions have been the permitted development of office to residential which the council has now ceased through an Article 4 direction. The council will support the area's continued <del>employment</del> <u>industrial</u> use through encouraging investment only in <del>employment</del> <u>industrial</u> uses."	Consistency with the London Plan.
MiM25	North	5.3.22	"...Intensification and co-location within the locally significant industrial sites in this place will create space that meets 21st century <del>employment</del> <u>industrial</u> needs and continue to provide good local employment opportunities....."	Consistency with the London Plan.
MiM26	North	5.3.26	"...the intensification and co-location of <del>employment</del> <u>industrial</u> uses at the Queensbury LSIS and Morrisons sites....."	Consistency with the London Plan.
MiM27	North	5.3.28	"...will need to address the requirement to intensify <del>employment</del> <u>industrial</u> uses too....."	Consistency with the London Plan.
MiM28	North	5.3.29	"...will also support intensification of <del>employment</del> <u>industrial</u> space on the LSIS..."	Consistency with the London Plan.



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			"...to achieve an increase in <u>employment industrial</u> floorspace and retention of a food store..."	
MiM29	North	5.3.40	"...The redevelopment of these sites is expected to intensify <u>employment industrial</u> floorspace and ensure long term safeguarding for <u>employment industrial</u> uses....."	Consistency with the London Plan.
MiM30	North	5.3.46	"...the Growth Area boundary has been extended. <u>This new boundary is considered to form an extension to the Burnt Oak and Colindale Opportunity Area boundary previously identified to be within Brent...</u> "	Clarify so that it is clear where London Plan opportunity area policies apply.
MiM31	North	5.3.47	"An extensive area of Locally Significant Industrial Site off Capitol Way provides the opportunity to better meet Brent's longer term <u>employment industrial</u> needs through investment in new premises. Consistent with London Plan <u>employment industrial</u> land policies..."	Consistency with the London Plan.
MiM32	North West	5.4.12	"...which makes it supportive of <u>employment industrial</u> activities."	Consistency with the London Plan.
MiM33	North West	Opportunities	"Intensification of <u>employment industrial</u> uses at East Lane.."	Consistency with the London Plan.
MiM34	North West	5.4.26	"East Lane SIL has a number of positive characteristics which in the context of London Plan policy make it a good candidate for further intensification for <u>employment industrial</u> uses."	Consistency with the London Plan.
MiM35	South	5.5.6	"Locally Significant Industrial Sites in Church End contain low density <u>employment industrial</u> uses..."	Consistency with the London Plan.
MiM36	South	5.5.30	"The regeneration of Old Oak, an existing industrial site to the south of Harlesden, is planned. It will deliver <del>24,000</del> <u>25,500</u> homes and <del>55,000</del> <u>65,000</u> new jobs	Change related to review of OPDC Local Plan following Car Giant

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>focussed around a new High Speed 2 and Elizabeth Line interchange <u>and intensification</u> in Park Royal <del>is to deliver a further 10,000 jobs and 1,500 homes</del>. The project is being led by the Old Oak Park Royal Development Corporation (OPDC). It will be important that the council continues to work with the OPDC <u>and Network Rail as the owners of the operational rail infrastructure, in addition to Transport for London, potential developers</u> and community groups. This is to ensure this significant regeneration project brings the highest number of benefits for Brent residents as possible. In particular, a key priority is to improve the connectivity between Old Oak and Harlesden <del>through, now likely to focus on Old Oak Lane, in addition to an enhanced Willesden Junction Station (including over-station development), and wayfinding.</del> This will better ensure local residents can benefit from job opportunities and new facilities and that Harlesden Town Centre is not adversely affected by a proposed major centre at Old Oak”</p>	site change and request from TfL spatial planning.
MiM37	South	5.5.32	<p>“...There is an opportunity to extend the Growth Area boundary to include nearby low density <u>employment industrial</u> sites to promote investment in these areas. Church End Locally Significant Industrial Sites are low density <u>employment industrial</u> sites...”</p> <p>“..In advance of adoption of a Church End masterplan supplementary planning document which will seek comprehensive solutions for these <u>employment industrial</u> areas, small scale release of sites will be resisted.”</p>	Consistency with the London Plan.
MiM38	South	Chapter Heading	“SOUTH <u>PLACE</u> ”	Consistency in the document
MiM39	South East	5.6.5	“Although there are no designated <u>employment industrial</u> sites here...”	Consistency with the London Plan.

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			"Lonsdale Avenue <u>Road</u> "	Factual
MiM40	South East	5.6.8	"The London Overground travels through this place <u>providing an orbital route linking Richmond/Clapham Junction and Stratford ...</u> "	Factual
MiM41	South East	5.6.11	"...The proposed extension to the Mapesbury, <u>Kensal Green, Queen's Park, Brondesbury, Kilburn, and Willesden Green</u> conservation areas, <u>plus potential new ones for Kensal Rise, Kilburn Lane and Malvern Road</u> <del>boundary to include parts of Cricklewood Town Centre</del> reflects the distinct and special character of these areas as outlined in the Brent Heritage Study..."	Factual
MiM42	South East	Following 5.6.7	"Although generally a relatively an affluent ....."	To correct typo
MiM43	South East	5.6.22	"...Within this area there are no designated <del>employment</del> <u>industrial</u> sites here..."	Consistency with the London Plan.
MiM44	South East	5.6.23	"In the Keep Britain <u>Tidy</u> qualitative study ...."	To correct
MiM45	South East	5.6.24	" <del>Crossrail</del> <u>Elizabeth Line</u> "	To reflect name change
MiM46	BSESA7	INFRASTRUCTURE REQUIREMENTS	"Thames Water will need to be engaged at the earliest opportunity to agree <u>a</u> drainage strategy ....."	To correct typo
MiM47	BSESA13	RISKS	Amend to: "Need to decant existing residents. <del>Relocation of current residents and their opposing.</del> "	To correct typo and for consistency
MiM48	BSESA18	ADDRESS	Amend to " <del>243</del> <u>245</u> -289...."	Correct address of allocation
MiM49	BSESA18	DESIGN PRINCIPLES	"Development should respond to the height and proportions of adjoining 3 storey development and be of a quality which complements local character."	To correct typo

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM50	BSESA20	JUSTIFICATION	"The Brent Retail & Leisure Needs Study identifies to continue this positive momentum <del>and</del> additional ...."	To correct typo
MiM51	BSESA20		Add OS based map of site	To correct
MiM52	BSESA21		Add OS based map of site	To correct
MiM53	BSSA6	PLANNING HISTORY	Amend to: "Planning <u>committee has been minded to approve an</u> application to develop 130 residential units on Argenta House site. (18/4847)"	To reflect change in status of planning application
MiM54	BSSA6	PLANNING CONSIDERATIONS	Amend to: "The site contains a light industrial units."	To correct typo
MiM55	South West	5.7.11	'...Sudbury & Harrow <u>Road</u> rail station...'	Correct name
MiM56	South West	5.7.22	"Alperton (South) LSIS land will be protected for solely <del>employment</del> <u>industrial</u> uses within use class B1c, B2, B8 and all closely related sui generis uses and where possible its use intensified."	Consistency with the London Plan.
MiM57	South West	5.7.23	"Redevelopment of existing industrial floorspace and provision of new <del>employment</del> <u>industrial</u> floorspace in mixed-use development (co-location)....."	Consistency with the London Plan.
MiM58	South West	5.7.31	"..The redevelopment of Northfields Grand Union which has commenced for approximately <del>2900</del> <u>3030</u> new homes plus employment land..."	Correct dwellings to reflect current planning permission.
MiM59	South West	5.7.32	"..Taking account of much of its use as either Locally Significant Industrial Site, Local Employment Site and Strategic Industrial Land and Brent's provide capacity status for <del>employment</del> <u>industrial</u> land in the London Plan, a greater emphasis on <del>employment</del> <u>industrial</u> use in	Consistency with the London Plan.

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			mixed use developments is now sought than was previously the case in allocations...”	
MiM60	BSWA10		“ <del>BSWA10</del> <u>BSWSA10</u> ”	Correct reference
MiM61	BSWSA10	Design Principles	“... <del>pubic</del> <u>public</u> space...”	To correct typo
MiM62	Housing	6.2.12	“... <del>Whilst they do</del> <u>Where such accommodation is purpose built, well managed and high quality it provides</u> a valuable role in meeting housing need <u>and will be supported</u> . <del>However where this is not the case their</del> concentration can sometimes have adverse impacts on neighbours. <u>HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families. ....</u> ”	Provide clarity in certain situations as sought by Quintain.
MiM63	Housing	6.2.16	“..benchmark <del>target</del> <u>figure</u> ...”	London Plan figures are a benchmark figure, not a target as identified by GLA.
MiM64	Housing	After paragraph 6.2.27 under London Plan heading	“ <del>Policy H9 Vacant Building Credit</del> ”.	Policy removed from London Plan.
MiM65	Housing	6.2.69	“...The landlords will be expected to register properties in conformity with the council’s licensing scheme. <u>In Build to Rent developments (as defined in the London Plan Policy H13) the Council is aware that operators may want to rent some self-contained properties to sharers and that it would be an unnecessary burden on both the Council and the developer to require planning permission for each change of use from self-contained dwelling to House in Multiple Occupation. As such the Council will seek to work with Build to Rent schemes to ensure that there is sufficient flexibility in planning permissions to ensure that</u>	To provide greater clarity on how Build to Rent schemes will be dealt with where properties are expected to be let to sharers.

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			<u>an agreed number of dwellings can be used as Houses in Multiple Occupation at any one time.</u> "	
MiM66	Housing	Add 6.2.78a	" <u>The inclusion of older people's housing will play a part in creating mixed and balanced communities. The Housing Learning and Improvement Network (Housing LIN) provides a good source of information on high quality and innovative housing solutions for an aging population. Guidance has been produced by HAPPI (Housing our Aging Population Panel for Innovation) that gives examples of how to design homes so that they better meet users' needs. It also shows how they can be positively integrated into places to encourage the benefits that interaction creates between occupiers of the dwellings and the wider community.</u> "	Increased justification and guidance.
MiM67	Housing	6.2.100	"...meet residents' needs. <u>Where not meeting the standards, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account factors such as, accessibility of dwellings to their own amenity space and its quality, the amount and quality of communal space, proximity to other areas of open space nearby and internal amenity spaces.</u> The calculation...."	Build in policy flexibility.
MiM68	Economy & Town Centres	6.4.9	"The London Plan identifies Brent as having potential to provide additional <del>employment</del> <u>industrial</u> floorspace capacity. To achieve this, there will be a need to make better use of industrial sites and secure additional <del>employment</del> <u>industrial</u> floorspace elsewhere. This will be through intensification of SIL and LSIS to increase plot ratio to a minimum of 0.65; seeking an increase in <del>employment</del> <u>industrial</u> floorspace on non-designated industrial sites; securing new <del>employment</del> <u>industrial</u> floorspace in Growth Areas and through the diversification of town centres."	Consistency with the London Plan.

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MiM69	Economy & Town Centres	Following 6.4.10	"London Plan E7 <u>Industrial</u> intensification, co-location and substitution"	Reflect Intend to Publish London Plan
MiM70	Economy & Town Centres	Following 6.4.10	Place before SD8: "London Plan SD8 <u>7</u> Town Centres: Development principles and Development Plan Documents"	Reflect Intend to Publish London Plan
MiM71	Economy & Town Centres	Following 6.4.10	"London Plan SD <u>7</u> 8 Town centre network"	Reflect Intend to Publish London Plan
MiM72	Economy & Town Centres	6.4.11	"...to provide additional <del>employment</del> <u>industrial</u> floorspace. All major developments exceeding 3000 sq.m in the Growth Areas outlined <del>above</del> <u>in policy BE1</u> should ...."	Consistency with the London Plan and for clarity
MiM73	Economy & Town Centres	6.4.12	"If an <u>o</u> perator is ..."	To correct typo
MiM74	Economy & Town Centres	6.4.12	"The level of fit out of the workspace to a specification agreed with the Affordable Workspace <del>Provider</del> <u>Operator</u> and to ..."	To correct
MiM75	Economy & Town Centres	6.4.15	" <del>Major developments will be required to produce an</del> Employment, Apprenticeship and Training Plans <u>will be required</u> in line with ..."	To correct to reflect policy BE1 and for clarity
MiM76	Economy and Town Centres	6.4.18	"... <del>The West London Employment Land Review (WLELR) identified demand for an additional 0.6ha of industrial</del> floorspace, primarily to meet projected demand for logistics. <u>In addition to this, a number of sites within designated industrial sites are protected for waste purposes as identified in the West London Waste Plan and the policies map. The London Plan sets a higher waste target for Brent than previously which may mean additional sites for waste purposes will be required. Consistent with its 'provide capacity' status Brent the Council is committed to exceeding this figure deliver an</u> te increase <u>in</u> industrial floorspace to support growth in	Align with London Plan policy.

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			business and employment."	
MiM77	Economy and Town Centres	6.4.18	"...intensification of Park Royal which is being led by the OPDC. <u>The extent to which intensification and co-location will lead to an increase in industrial floorspace at this time is not known. Initial preliminary masterplan options work on Staples Corner in association with the GLA has shown addressing landownership and viability issues to incentivise and deliver additional floorspace is a complicated process. Nevertheless, the Council will undertake best endeavours to provide additional capacity, with a backstop position of not dropping below the 0.65 plot ratio within each defined industrial location.</u> "	Align with London Plan policy.
MiM78	Economy & Town Centres	6.4.18	Amend to: "The West London Employment Land <del>Review Evidence (WLELR-WLELE)</del> "	To correct
MiM79	Economy & Town Centres	6.4.19	" <del>WLELR-WLELE</del> "	To correct
MiM80	Economy and Town Centres	6.4.20	"In calculating what constitutes the minimum floorspace requirement required in any site's redevelopment, the existing <del>employment</del> <u>industrial or warehousing</u> floorspace or a plot ratio of 0.65 will be applied, whichever is the higher..."	Align with London Plan policy.
MiM81	Economy & Town Centres	6.4.21	"...closely related sui generis uses. <u>They can be sites wholly in employment use, or part of the floorspace or yardspace of a mixed use building or site.</u> They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy <u>in recognition of the borough's provide capacity status seeks to support the retention and intensification of Local Employment Sites for continued industrial use, consistent with policy E7 of the London Plan.</u> The policy...."	To provide greater clarity/ consistency with London Plan on sites in industrial use.



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MiM82	Economy & Town Centres	6.4.22	"...with short term flexible leases appropriate for SMEs. <u>Where the Council accepts that a site is unviable for its retention for wholly employment purposes, it will seek the re-provision of maximum amount of employment space that is viable in any development proposal.</u> "	To clarify that employment floorspace provision will be sought where wholly employment use is unviable.
MiM83	BE4		Formatting: "DIVERSITY OF USES" should not be the policy title but is a heading related to the policy wording below of: "No further...."	To correct
MiM84	Economy & Town Centres	Following 6.4.61	" <del>West London Employment Land Review Evidence-2019,</del> GL Hearn"	To correct
MiM85	Economy & Town Centres	Following 6.4.61	" <del>West London Affordable Workspace Study, 2019 Avison Young</del> "	To correct
MiM86	Economy & Town Centres	Following 6.4.61	" <del>Brent Industrial Land Audit and Intensification Analysis 2019, Brent Council</del> "	To correct
MiM87	Economy & Town Centres	6.4.30	"As referenced in the London Plan and Brent policy BHC4, the night time economies of Wembley has been identified as areas of National/ International importance, and those of Cricklewood, <u>Kilburn</u> and Wembley Park..."	To reflect London Plan.
MiM88	Heritage and Culture	Title Page	" <del>6.5 6-2</del> '	Correct chapter reference.
MiM89	Heritage and Culture	6.5.18	"...Its archaeological discoveries <u>to date</u> are scarce; ..."	Acknowledge uncertainty.
MiM90	Heritage and Culture	6.5.19	"...Policy <del>BD4</del> <u>BHC1</u> therefore..."	Reference correct policy.
MiM91	Heritage and Culture	6.5.26	"...evaluation, <u>in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works.</u> <u>Applicants should consult with Historic England's Greater London Archaeological Advisory Service should take</u>	Improve guidance.

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			<u>place in order to determine the scope of the archaeological requirements.</u> "	
MiM92	Heritage and Culture	6.5.29 start of paragraph	" <u>17 views have been identified. Two views originate outside the area where the Council is Local Planning Authority. The Council has made OPDC and LB Ealing aware of each view's origins and it will be for them to determine the weight to give to the importance of the views when considering proposed development in their respective areas. London Plan....</u> "	Clarity of position in response to OPDC.
MiM93	Green Infrastructure	6.6.10	" <u>Brent's existing blue infrastructure or Blue Ribbon Network, includes the River Lower Brent, Welsh Harp, Grand Union Canal - Paddington Arm, Wealdstone Brook, Brent Feeder Canal and Dollis Brook and Upper Brent.</u> "	Provide clarity on named blue infrastructure as sought by Environment Agency.
MiM94	Green Infrastructure	Evidence Base	" <u>Brent Biodiversity Action Plan 2007 OTHER GUIDANCE Biodiversity Metric 2.0. DEFRA/ Natural England Biodiversity net gain. Good Practice Principles for Development. A Practical Guide CIRIA/CIEEM/IEMA</u> "	Include more guidance as sought by Natural England/ Environment Agency.
MiM95	Green Infrastructure	6.6.30a	" <u>The River Brent, which gives the borough its name, formed a natural division between Willesden and Wembley. The name 'Brent' is Old English, from Celtic words meaning 'sacred waters'. The River Brent is formed of a number of tributaries, which join and flow to the borough of Ealing. Despite much of it now being culverted, it is significant to Brent's history and culture. Just as important are the Grand Union Canal and Brent Feeder Canal which are completely artificial watercourses and important as historic transport infrastructure. By 1820 there was not enough water to supply the canal, so under an Act of Parliament in 1819, the Regent's Canal Company decided to dam the River</u>	To provide greater emphasis on watercourses with heritage value in response to Canals and Rivers Trust.

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			<u>Brent and create a reservoir, an artificial lake, in order to guarantee a sufficient water supply. These water landscapes are recognised as non-designated heritage assets for their historic significance to protect and enhance cultural and heritage value to Brent. Equally, so is the protection, promotion and enhancement of their curtilage, which impact on the setting of these heritage assets.</u>	
MiM96	Green Infrastructure	6.6.31	<u>"Canal Cottage, Twyford Abbey Road (now in OPDC area) and Reservoir Cottage, in Birchen Grove, are locally listed but much of the twentieth-century development and canal heritage is not protected, and in particular, deserves better recognition. For example, the canal is supported by two aqueducts, one as it passes over the River Brent, the Twyford Aqueduct and the other over the North Circular Road (A406). Other historic features of the canal include a WWII concrete pillbox, bridges and concrete drainage mechanisms. The appropriate....."</u>	Identification of heritage assets in response to Canals and Rivers Trust.
MiM97	Green Infrastructure	6.6.34	"The Water Framework Directive is a European Union Directive which commits all member states <u>are required</u> to achieve <del>achieving</del> a 'good' status' or 'good ecological' status by 2021, or if an extension is granted, then <del>for all</del> <u>water bodies by 2027.</u> "	Strengthen and improve clarity as sought by Environment Agency
MiM98	Green Infrastructure	6.6.35	"In Brent <u>all</u> waterside developments and other developments..."	Strengthen.
MiM99	Green Infrastructure	6.6.36	<u>"6.6.36 a)"</u> and remainder of bullets subsequent and paragraph numbers.	Correct.
MiM100	Sustainable Infrastructure	6.7.5	"...as well as devastating environmental impacts. <u>Brent is susceptible to flooding from different sources.</u> Fortunately, over the last twenty years, Brent has not	Reference types of flooding as sought by Environment Agency.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			experienced major flooding <u>from its brooks and rivers</u> , with the most recent events..."	
MiM101	Sustainable Infrastructure	6.7.9	" <u>The Council made its "climate and ecological emergency" declaration in July 2019, promising to aim for carbon neutrality by 2030. It will be delivering a new climate strategy in 2020, which will provide greater clarity on the actions that will be taken in Brent to address climate change. In terms of clean generation....."</u>	To identify added priority given to climate change by the Council in 2019.
MiM102	Sustainable Infrastructure	6.7.35	"...subject to periodic review. <u>6.7.35a In exceptional circumstances and consistent with national policy outputs there may be occasions where development in the functional floodplain is required. For the most part this is likely to be only for water compatible uses. Nevertheless, due to development that has occurred in Brent in what would otherwise have been functional floodplain, there may be exceptional circumstances where it is appropriate for small incursions into the functional floodplain to be considered acceptable in principle if it has other significant benefits in relation to watercourse environment or risk of flooding. Examples could be returning a larger area to functional floodplain, or reducing the likelihood of impediments to river flow that might currently exist, such as stilts holding up buildings over a watercourse. Where any intervention that is defined as development in the functional floodplain occurs, the council will also seek the opportunity to improve through that development the environmental quality of the watercourse."</u>	Supporting text for development on floodplain to clarify following representation from Environment Agency.
MiM103	Transport	6.8.6	" <u>Crossrail Elizabeth Line, Great Western Mainline and High Speed 2 stations)</u> ..."	To reflect name change and acknowledge other lines that will be connected to.

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MiM104	Transport	6.8.6	"...A pedestrian route over the A5 is needed to connect Brent Cross West station to Staples Corner. <u>The precise location of the WLO stations will be firmed up as the project progresses. When there is more certainty on their location more detailed work can be done on improving their connectivity to surrounding areas.</u> To the south....."	Reflects circumstances.
MiM105	Transport	6.8.14	"This includes mitigation on small scale schemes ...."	To correct typo
MiM106	Transport	6.8.16	"The requirements for electric charging points and cycle parking are set out in London Plan policy <u>T5 and T6-T6.1.</u> "	To correct referencing as sought by TfL Spatial Planning.
MiM107	Transport	Figure 38	Colourwash the OPDC area and include on the key.  Provide higher definition Figure Map	To provide clarity on OPDC and LB Brent local planning authority areas
MiM108	Delivery and Monitoring	7.1.6	"...thorough cross <del>subsidisation</del> <u>subsidy</u> on development "..arm's length delivery vehicle ( <u>company name: i4B</u> ) in assisting .."	Grammar and supplementary information.
MiM109	Delivery and Monitoring	7.1.8	"...on-going funding..."	Correct spelling
MiM110	Delivery and Monitoring	7.1.15	"...additional premises. <u>There is the potential for expansion of healthcare provision in the Brent area to support growth in adjacent communities and vice versa. The Council and the Brent CCG will work with adjoining boroughs (and OPDC) and relevant CCGs to ensure suitable and timely provision of necessary facilities.</u> "	Acknowledge cross-boundary working/ provision as identified by OPDC.
MiM111	Delivery and Monitoring	7.1.18	"..open space <del>are</del> <u>is</u> the Brent River Park" "...different ways of <del>trying</del> seeking to support...."	Grammar corrections.

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MiM112	Delivery and Monitoring	Figure 39 new first and second measures:	"Proportion of Brent Local Super Output Areas in the bottom 20% of most deprived areas nationally as identified in the Indices of Multiple Deprivation." Target "15% 2031" Specific Policy to be monitored "Development Vision" Performance Measure "Proportion of the top 20% least deprived areas nationally as identified in the Indices of Multiple Deprivation." Target "2% 2031" Specific Policy to be monitored "Development Vision"	Improve monitoring of policy outcomes.												
MiM113	Delivery and Monitoring	Figure 39	"Performance Measure <u>Number of homes built on small sites</u> . Target <u>433 dwellings</u> . Specific policy to be monitored <u>BH4</u> "	Create target for monitoring.												
MiM114	Appendix 1		<p>8.1.1 <del>Once adopted, the</del> <u>The</u> policies in this version of the Local Plan will replace <del>the majority of all</del> <u>all</u> policies within the Local Plan documents identified above. A small number of policies in the Brent Development Management Policies Plan will be taken forward unchanged with the exception of their policy number.</p> <p>.....</p> <table border="1"> <thead> <tr> <th>Policy Reference</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td><del>DMP1, DMP2, DMP3, MP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20</del> <u>All policies</u></td> <td>Superseded</td> </tr> <tr> <td><del>DMP4a</del></td> <td>Now referenced BE7</td> </tr> <tr> <td><del>DMP5</del></td> <td>Now referenced BE8</td> </tr> <tr> <td><del>DMP7</del></td> <td>Now referenced BHC1</td> </tr> <tr> <td><del>DMP21</del></td> <td>Now referenced BHC5</td> </tr> </tbody> </table>	Policy Reference	Status	<del>DMP1, DMP2, DMP3, MP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20</del> <u>All policies</u>	Superseded	<del>DMP4a</del>	Now referenced BE7	<del>DMP5</del>	Now referenced BE8	<del>DMP7</del>	Now referenced BHC1	<del>DMP21</del>	Now referenced BHC5	To reflect fact that the draft Local Plan has amended policies which it previously considered did not need updating and which are therefore going to be superseded.
Policy Reference	Status															
<del>DMP1, DMP2, DMP3, MP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20</del> <u>All policies</u>	Superseded															
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MiM115	Appendix 2		<u>SCHEDULE THAT SHOWS HOW LONDON PLAN DESIGN POLICY AND BRENT SPD1 DESIGN PRINCIPLES ARE INTER RELATED</u>	To provide greater clarity on what the Appendix is for.																																				
MiM116	Appendix 3		<p><u>BRENT LOCAL PLAN HOUSING DELIVERY TRAJECTORY. Consistent with Policy BH1 'Increasing Housing Supply in Brent' this trajectory is the delivery target against which the National Planning Policy Framework's Housing Delivery Test and 5 year Supply of Deliverable Housing Sites will be assessed.</u></p> <table border="1"> <thead> <tr> <th><u>Year</u></th> <th>19/20-23/24</th> <th>24/25-28/29</th> <th>29/30-33/34</th> <th>34/35-40/41</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td><u>Dwellings</u></td> <td>15,080 11,625</td> <td>12,402 11,625</td> <td>11,514 12,715</td> <td>6,560 8,800</td> <td>45,554 44,845</td> </tr> <tr> <td><u>Average Per Year Over Period</u></td> <td>3,016 2,325</td> <td>2,480 2,325</td> <td>2,302 2,543</td> <td>937 1,268</td> <td>2,070 2,038</td> </tr> <tr> <td><u>Year</u></td> <td></td> <td>19/20-28/29</td> <td></td> <td>29/30-40/41</td> <td></td> </tr> <tr> <td><u>Dwellings</u></td> <td></td> <td>27,482 23,250</td> <td></td> <td>18,074 21,595</td> <td>45,554 44,845</td> </tr> <tr> <td><u>Average Per Year Over Period</u></td> <td></td> <td>2,748 2,325</td> <td></td> <td>1,807</td> <td>4,555 2,038</td> </tr> </tbody> </table>	<u>Year</u>	19/20-23/24	24/25-28/29	29/30-33/34	34/35-40/41	Total	<u>Dwellings</u>	15,080 11,625	12,402 11,625	11,514 12,715	6,560 8,800	45,554 44,845	<u>Average Per Year Over Period</u>	3,016 2,325	2,480 2,325	2,302 2,543	937 1,268	2,070 2,038	<u>Year</u>		19/20-28/29		29/30-40/41		<u>Dwellings</u>		27,482 23,250		18,074 21,595	45,554 44,845	<u>Average Per Year Over Period</u>		2,748 2,325		1,807	4,555 2,038	To provide greater clarity on what the trajectory will be used for and updated to reflect estimated delivery based on knowledge of sites.
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MiM117	Appendix 4		<u>"BRENT PARKING STANDARDS TO BE USED IN ASSOCIATION WITH POLICY BT2 PARKING AND CAR FREE DEVELOPMENT WHICH ARE CONSIDERED NECESSARY RELATED TO BRENT'S CHARACTERISTICS RATHER THAN THOSE IN THE LONDON PLAN."</u>	Provides greater clarity on link between Appendix 4 and the Policy BT2.																																				

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM118	Appendix 4	8.4.5 c)	"one coach parking space should be provided for every 50 75 bedrooms".	Correction
MiM119	Appendix 5		<u>"BRENT NON RESIDENTIAL PREMISES SERVICING STANDARDS AS REQUIRED IN ASSOCIATION WITH POLICY BT3 'FREIGHT AND SERVICING, PROVISION AND PROTECTION OF FREIGHT FACILITIES'."</u>	Provides greater clarity on link between Appendix 5 and the Policy BT3.
MiM120	Appendix 6	Non-strategic policies	"..BESA4,..."	No Policy BESA4 is in the Local Plan
MiM121	Glossary	Add	<u>"Intensification Corridor: Principal movement corridors such as main roads, with good access to public transport where it is considered that higher density development/buildings around 5 storeys are likely to be appropriate."</u>	Provides clarity on term.
MiM122	Glossary	Locally Significant Industrial Sites (LSIS)	<u>"Employment Industrial sites identified in the Core Strategy Local Plan as being of significance to Brent's economy."</u>	Consistency with London Plan and update which Plan it is identified.
MiM123	Figures	Throughout	Include railway lines/ stations on all appropriate maps within the Plan	To provide clarity on rail infrastructure.

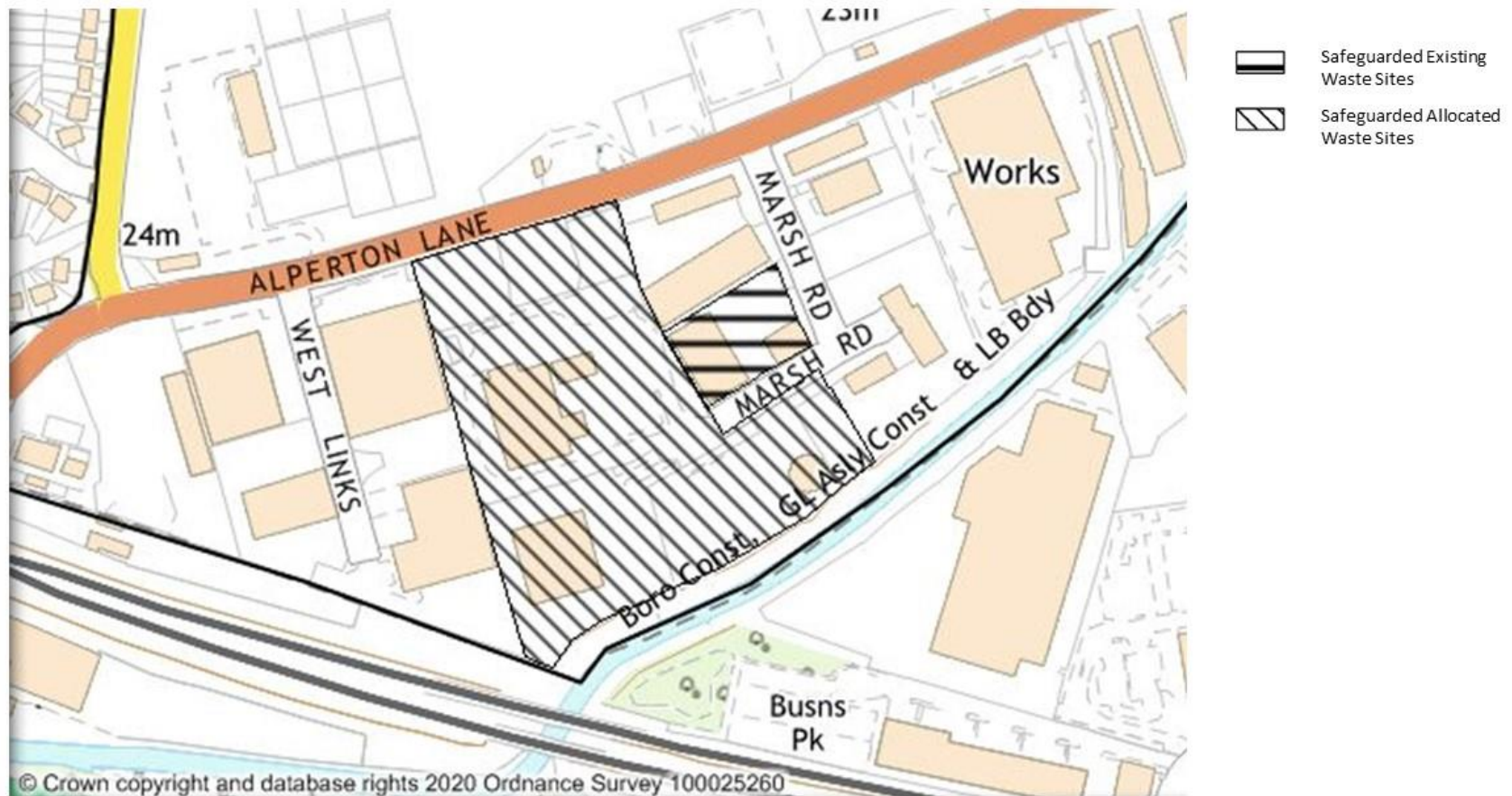
## Modifications to the Policies Map

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 1-5	None	None	Identify safeguarded waste sites as set out in the West London Waste Plan	To provide clarity on sites that have associated policies in the West London Waste Plan
Map Mod 6	Central	BCGA1	Identify Wembley Growth Area/Opportunity Area with a boundary consistent with the Wembley Growth Area.	Provide clarity on Wembley Opportunity Area for associated London Plan policies.

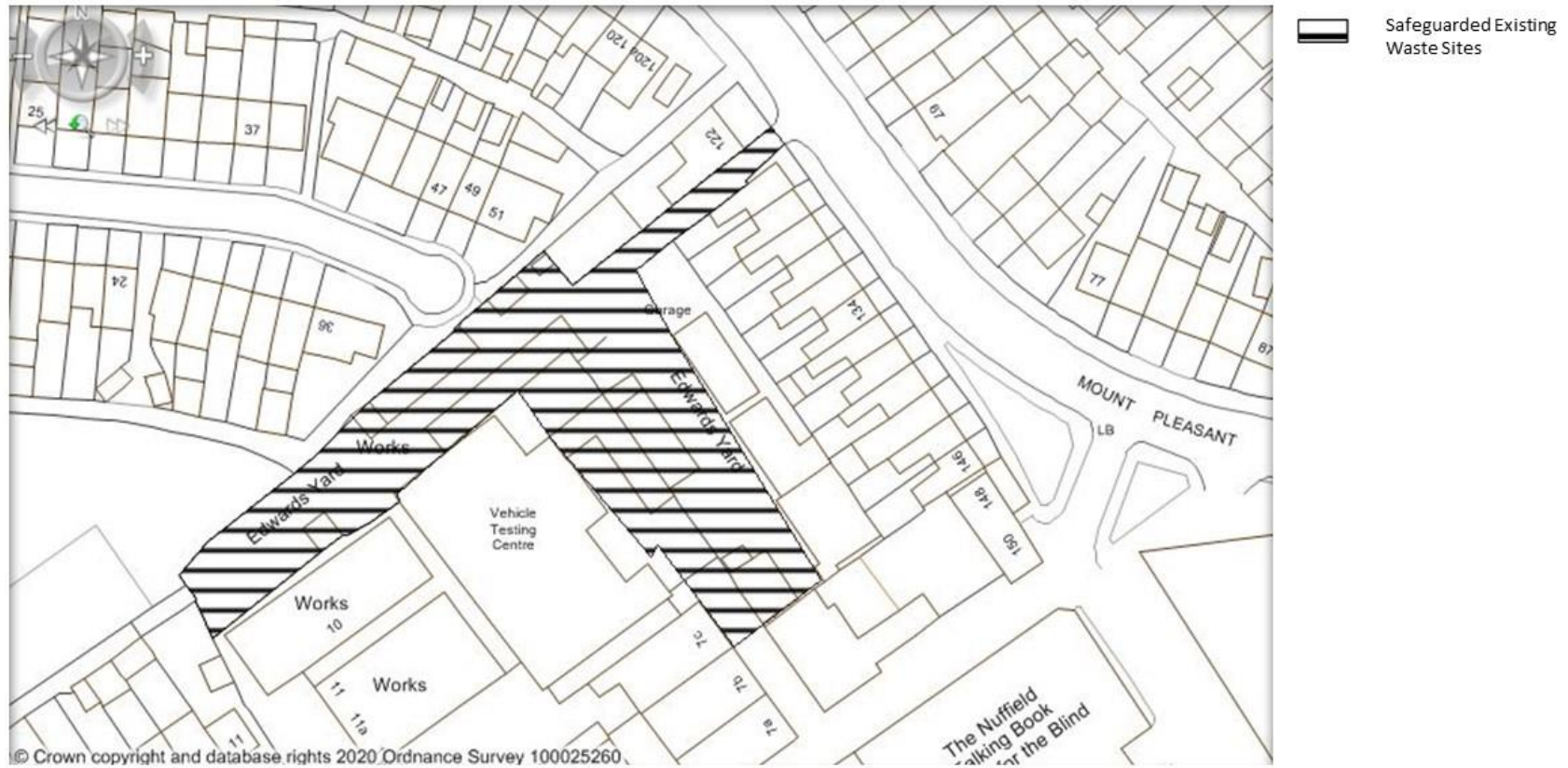


Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 7	North	BNGA1	Identify Burnt Oak Colindale Growth Area/Opportunity Area with a boundary consistent with the Burnt Oak Colindale Growth Area.	Provide clarity on Burnt Oak Colindale Opportunity Area for associated London Plan policies.
Map Mod 8	Design	BD2	Amend the policies map to include the Northfields development site within the Tall Buildings Zone. Update the associated Tall Buildings Strategy to reflect this change.	Ensure that the Zone and policy is reflective of an extant planning permission that incorporates tall buildings.
Map Mod 9	Design	BD2	Amend the map in the Tall Buildings Strategy and Policies Map to show the Tall Buildings Zone Core in Zone C of the Colindale Tall Buildings Zone extending to the edge of the main building line along Edgware Road so that it is consistent with the text in paragraph 8.51 of the Tall Buildings Strategy.	Improve Plan consistency.
Map Mod 10	Design	BD2	Remove from the Planning Policies Map Key: "Pinnacle" associated with the Tall Buildings Zones.	Remove old terminology.
Map Mod 11	Design	BD2	Add appropriate building heights for the Tall Buildings Zones on the interactive map consistent with the Tall Buildings Strategy.	To provide information that will support the policy.
Map Mod 12	Economy & Town Centres	BE2	Amend boundary of Northfields SIL to take account of planning permission 18/0321 where the principle of the loss of the site to predominantly residential development has been approved.	To provide clarity regarding the status of the site to no longer be considered as a Strategic Industrial Location.
Map Mop 13	Site Allocations	BESA17	Allocation was for residential which conflicted with policy BE2 which states that Wembley SIL is to be intensified with industrial uses only.	To create consistency throughout the plans policies.

### Map Mod 1 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Alperton Lane

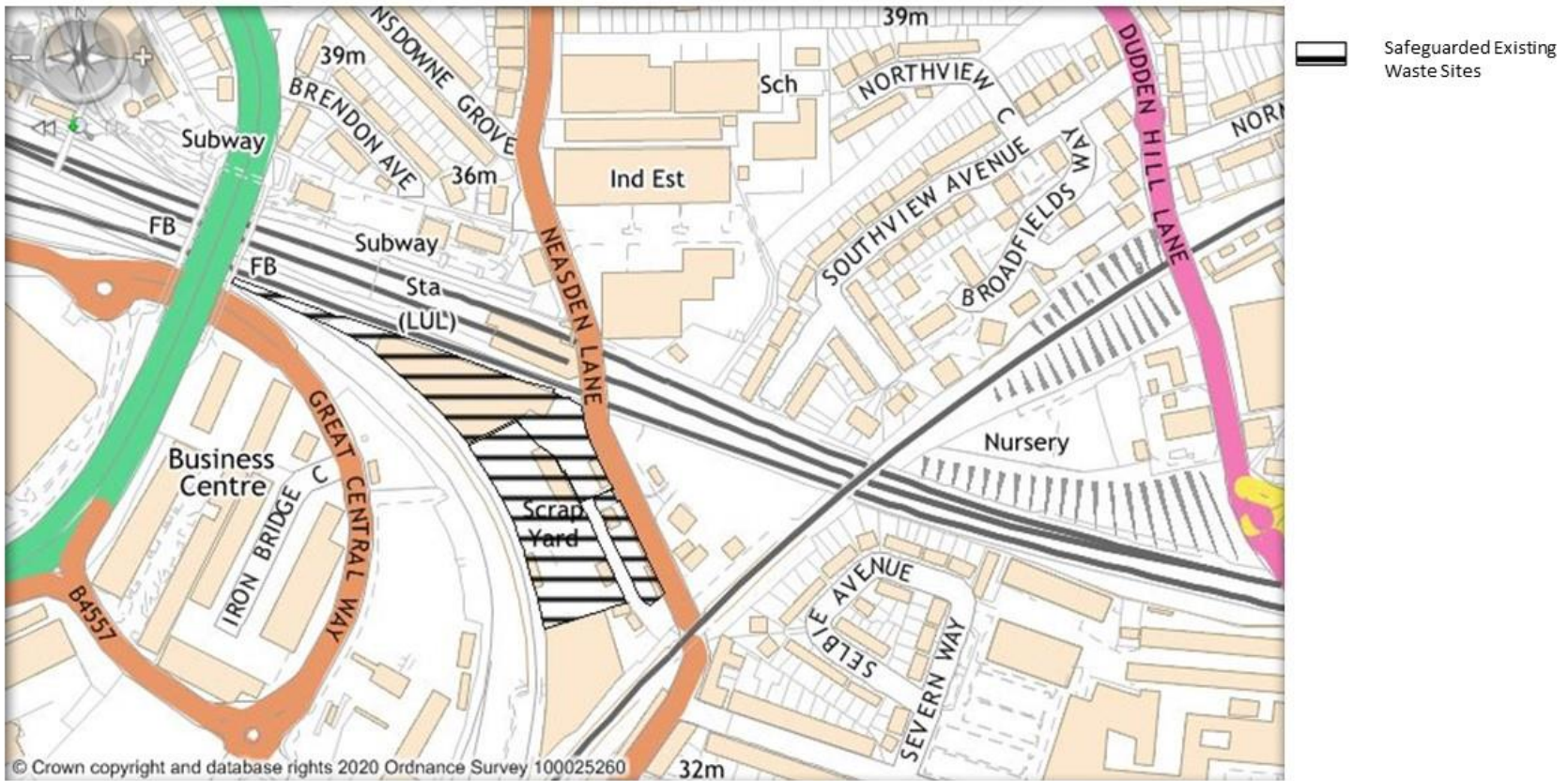


## Map Mod 2 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Mount Pleasant

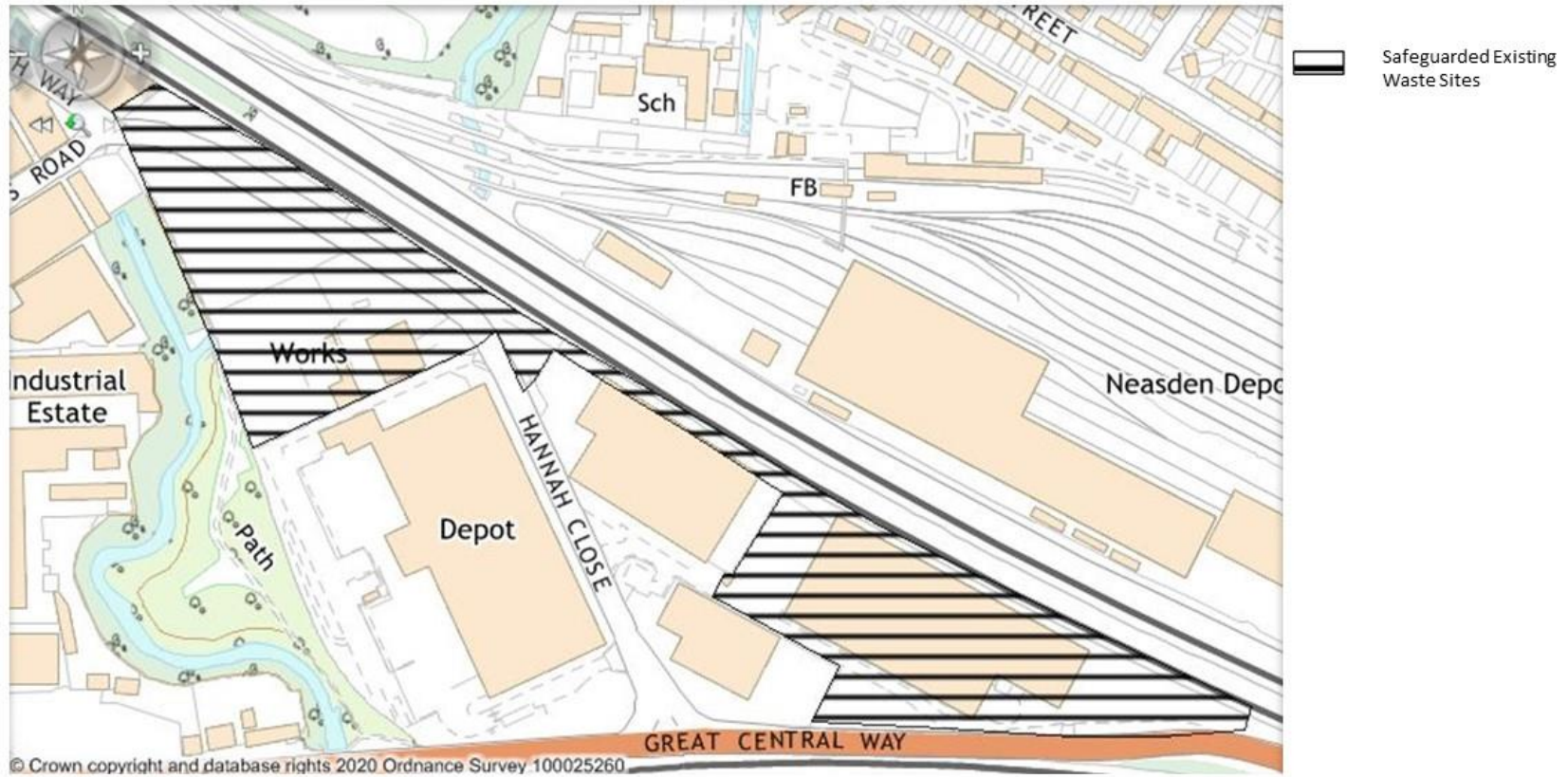




### Map Mod 3 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Neasden Lane

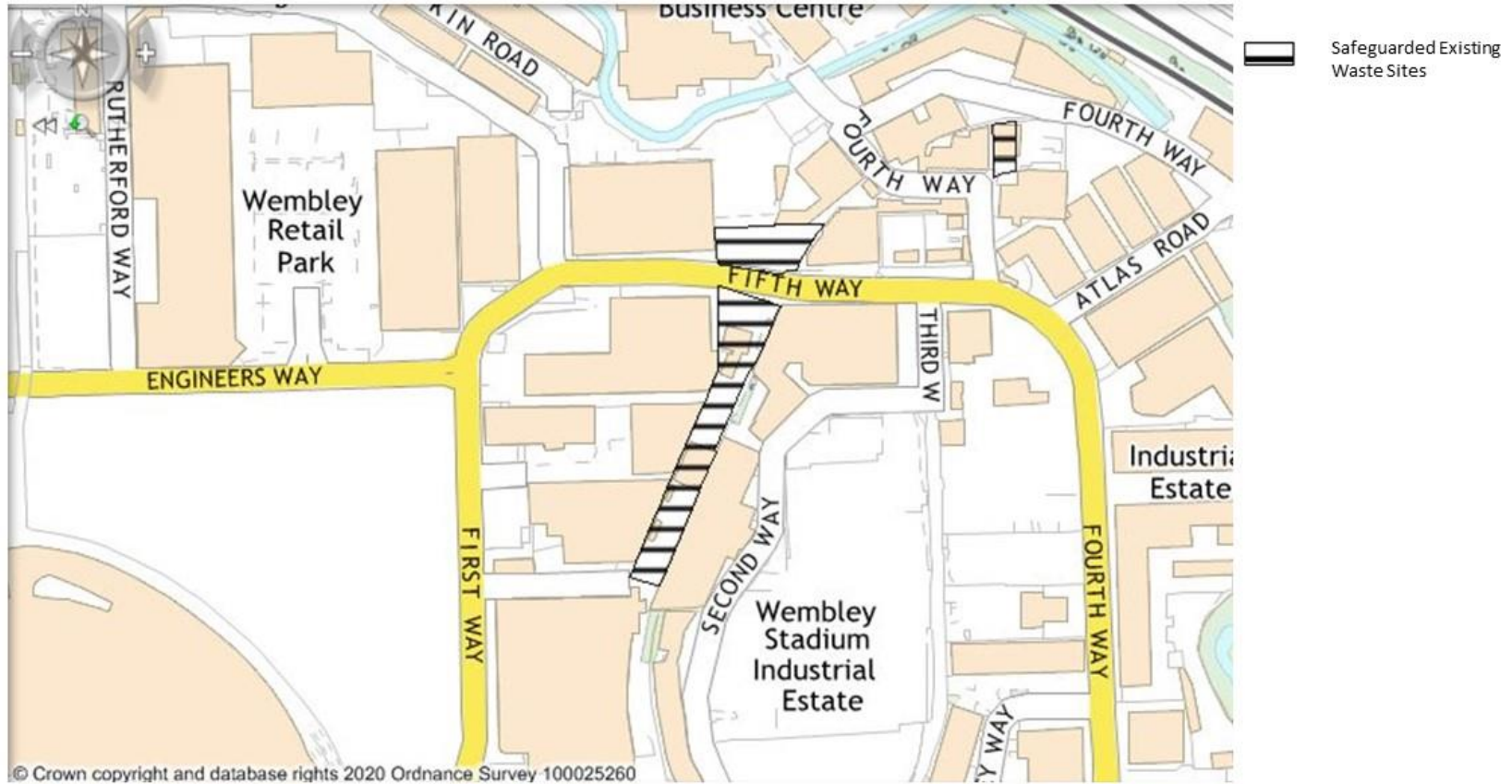


Map Mod 4 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Wembley Hannah Close

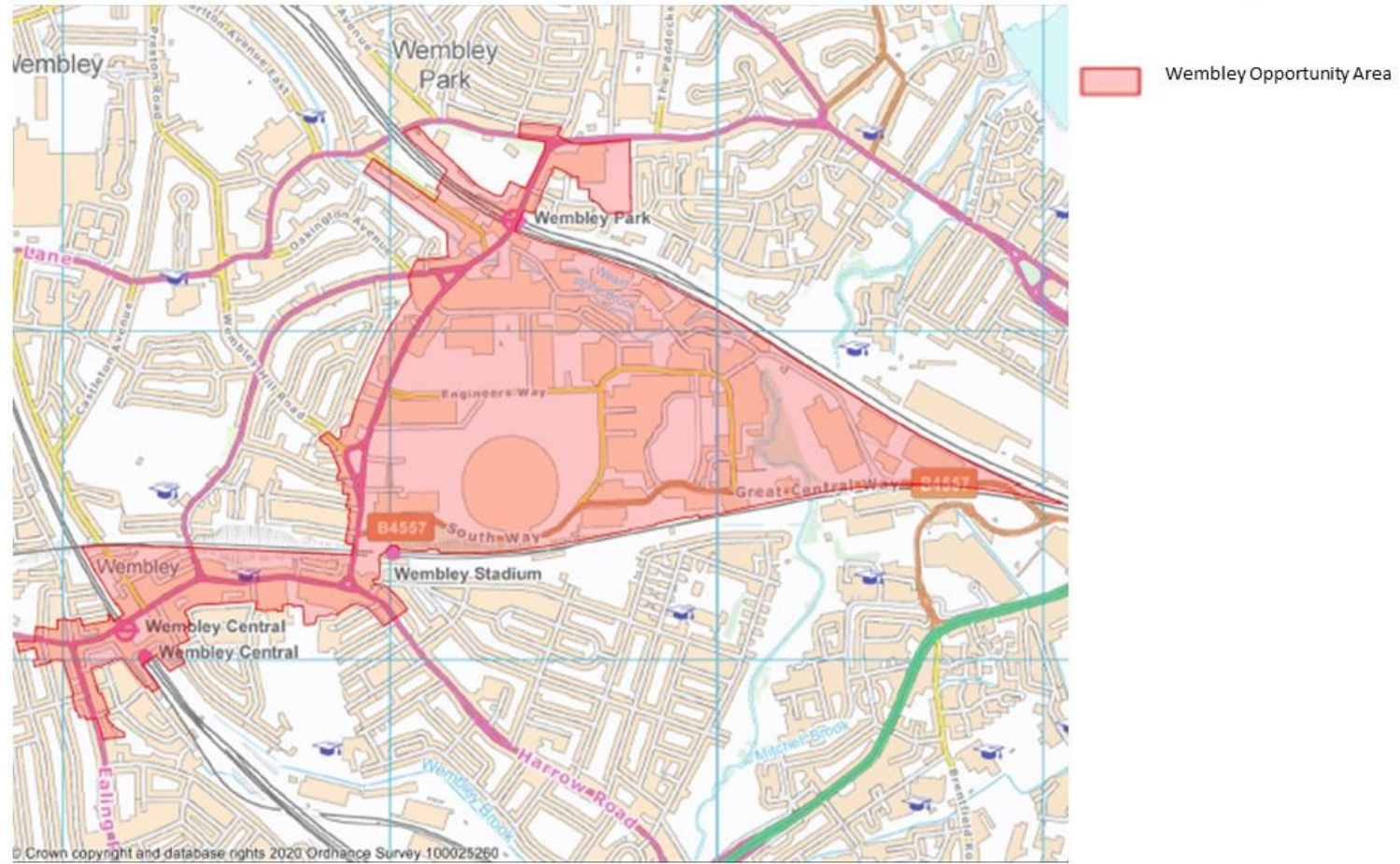




### Map Mod 5 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Wembley Fourth & Fifth

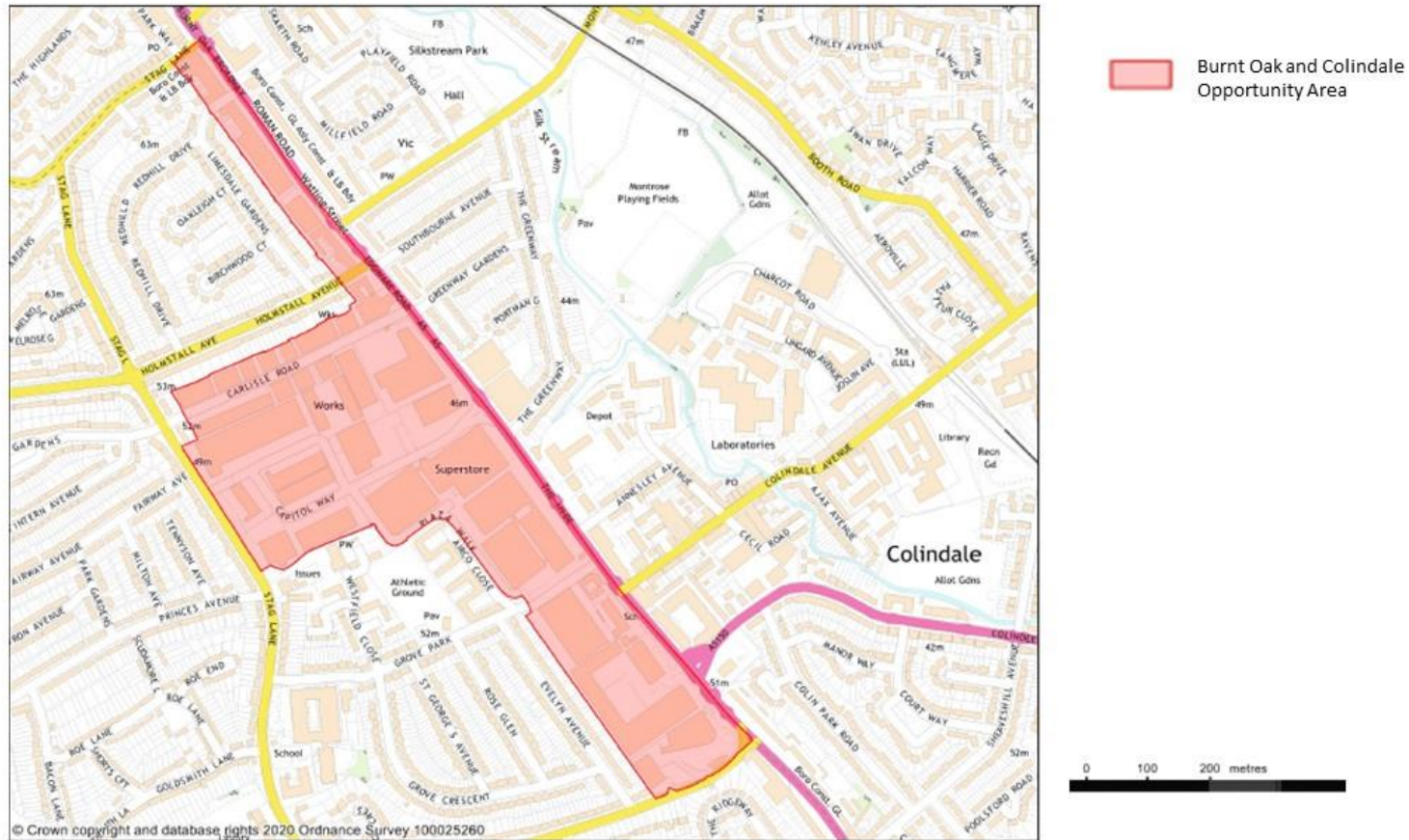


### Map Mod 6 Brent Draft Local Plan Submission Version Wembley Opportunity Area Boundary



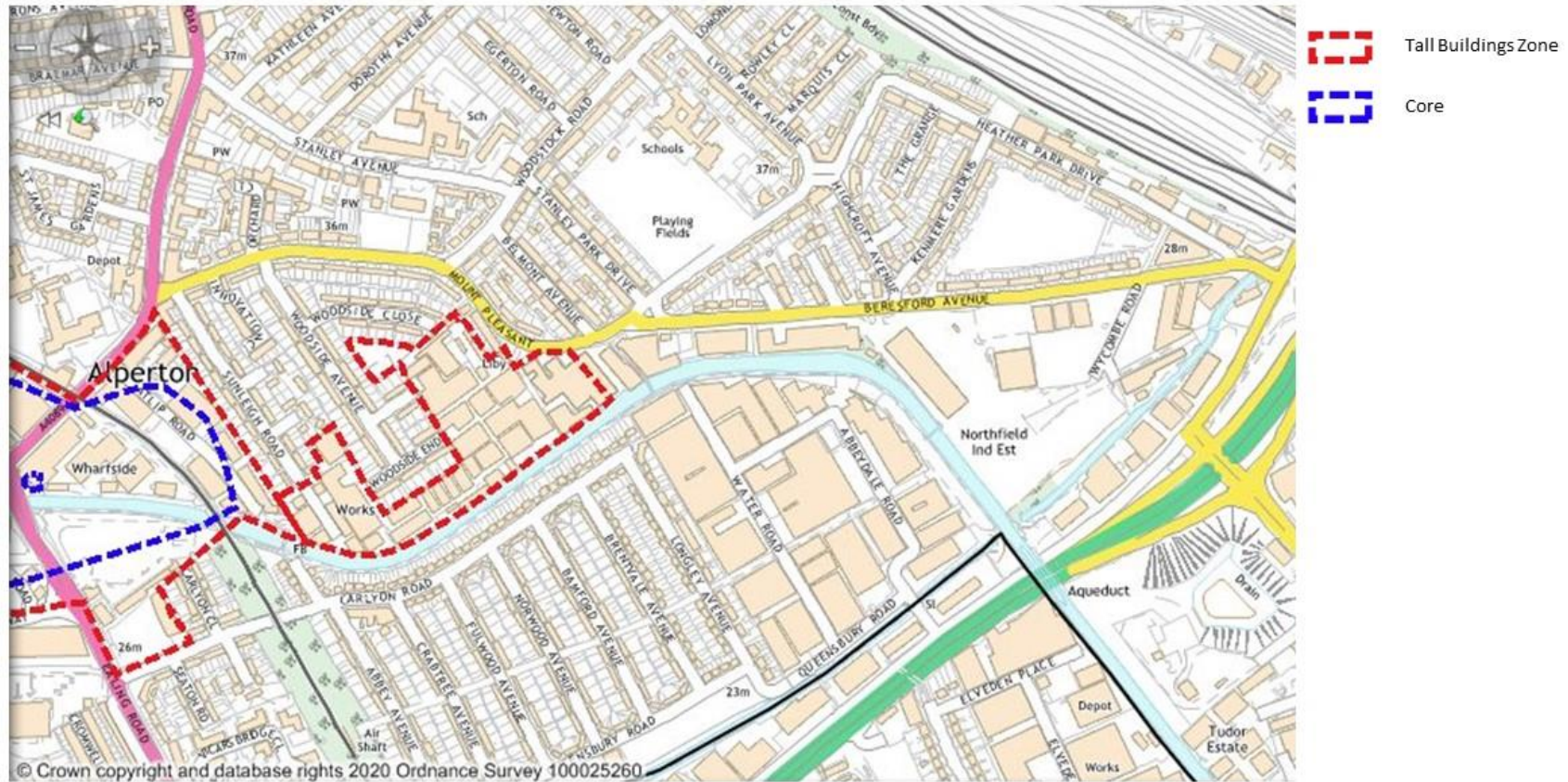


## Map Mod 7 Brent Draft Local Plan Submission Version Burnt Oak and Colindale Opportunity Area Boundary



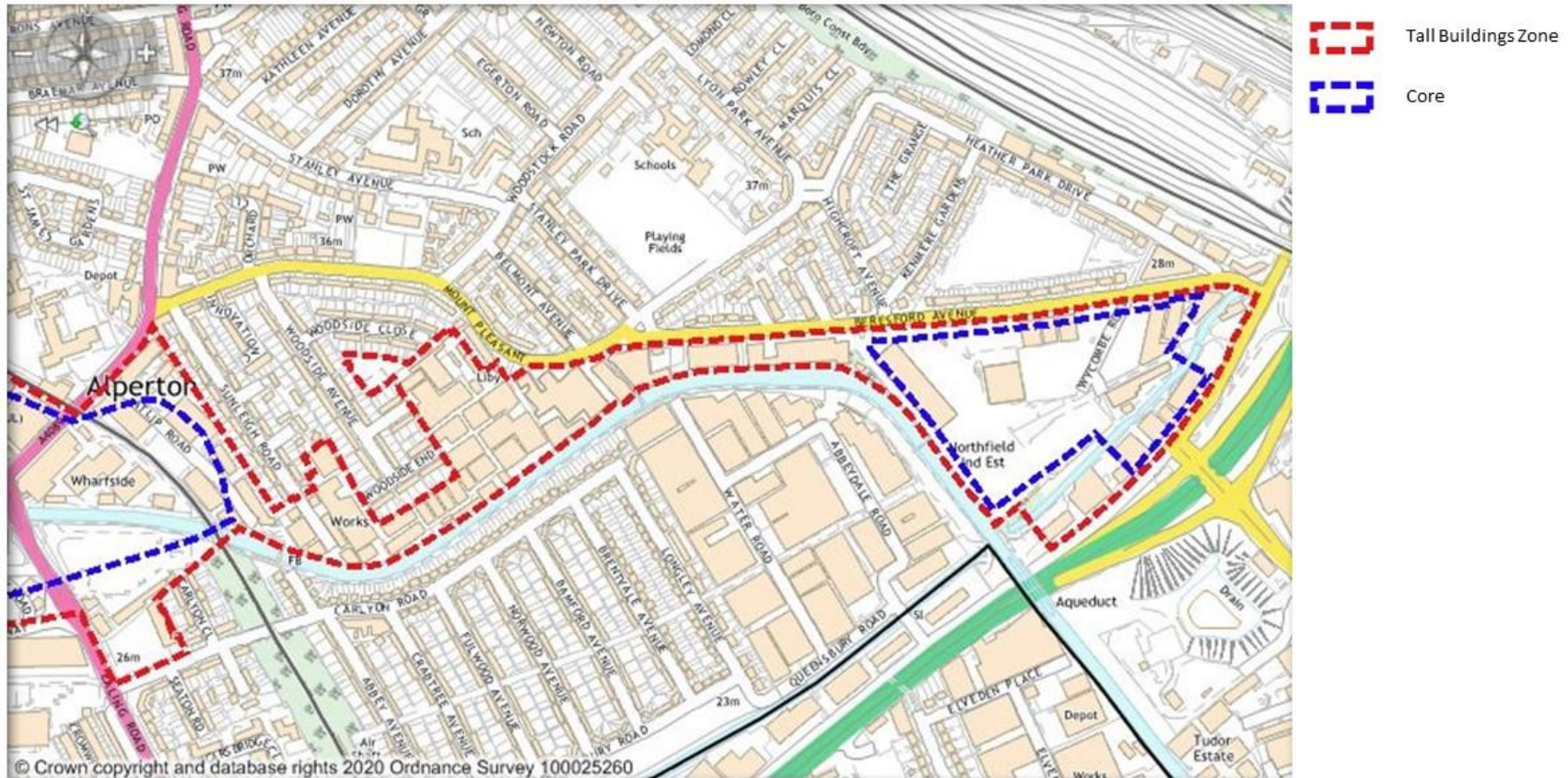


### Brent Draft Local Plan Regulation 19 Publication Version Tall Buildings Zone Alperton Eastern Boundary



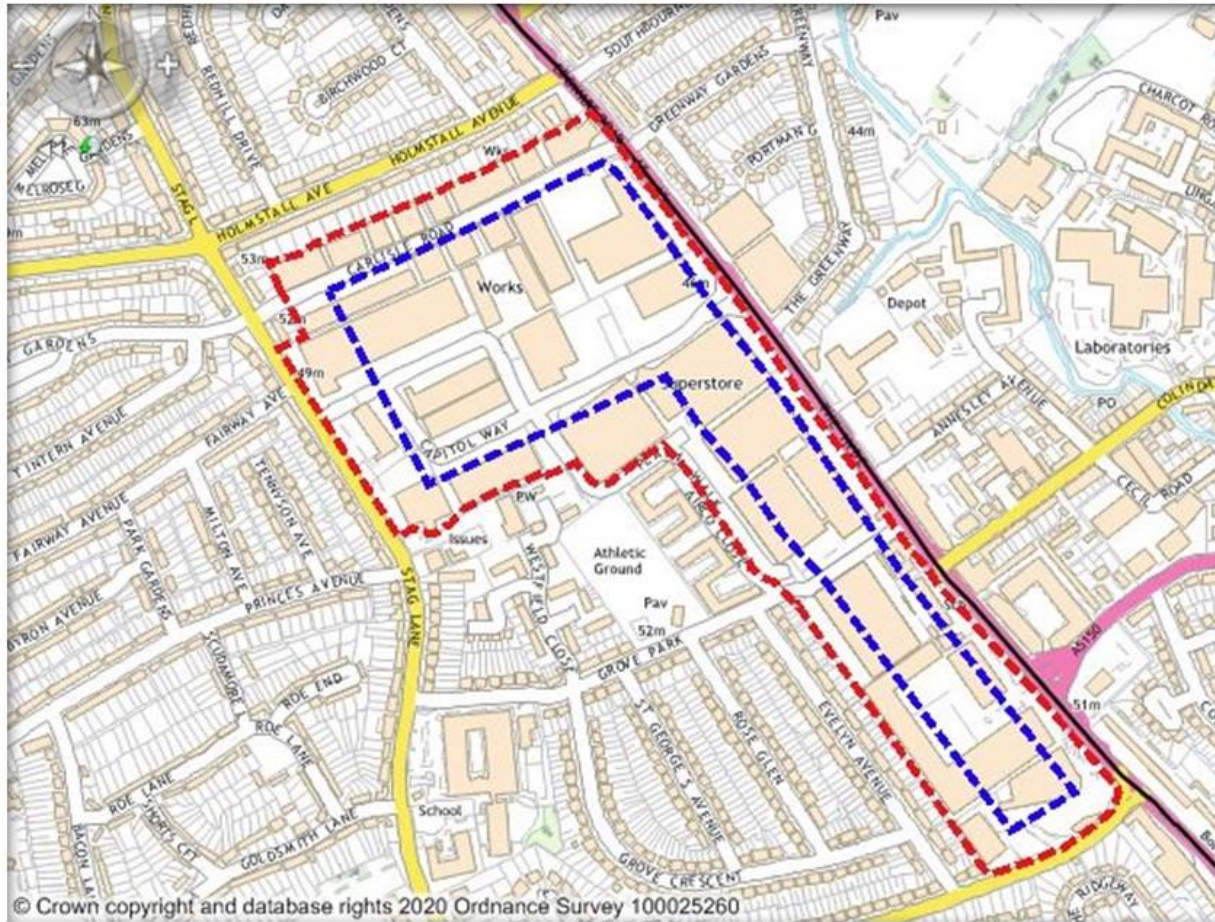


## Map Mod 8 Brent Draft Local Plan Submission Version Tall Buildings Zone Alperton Extended Eastwards To Include Northfields





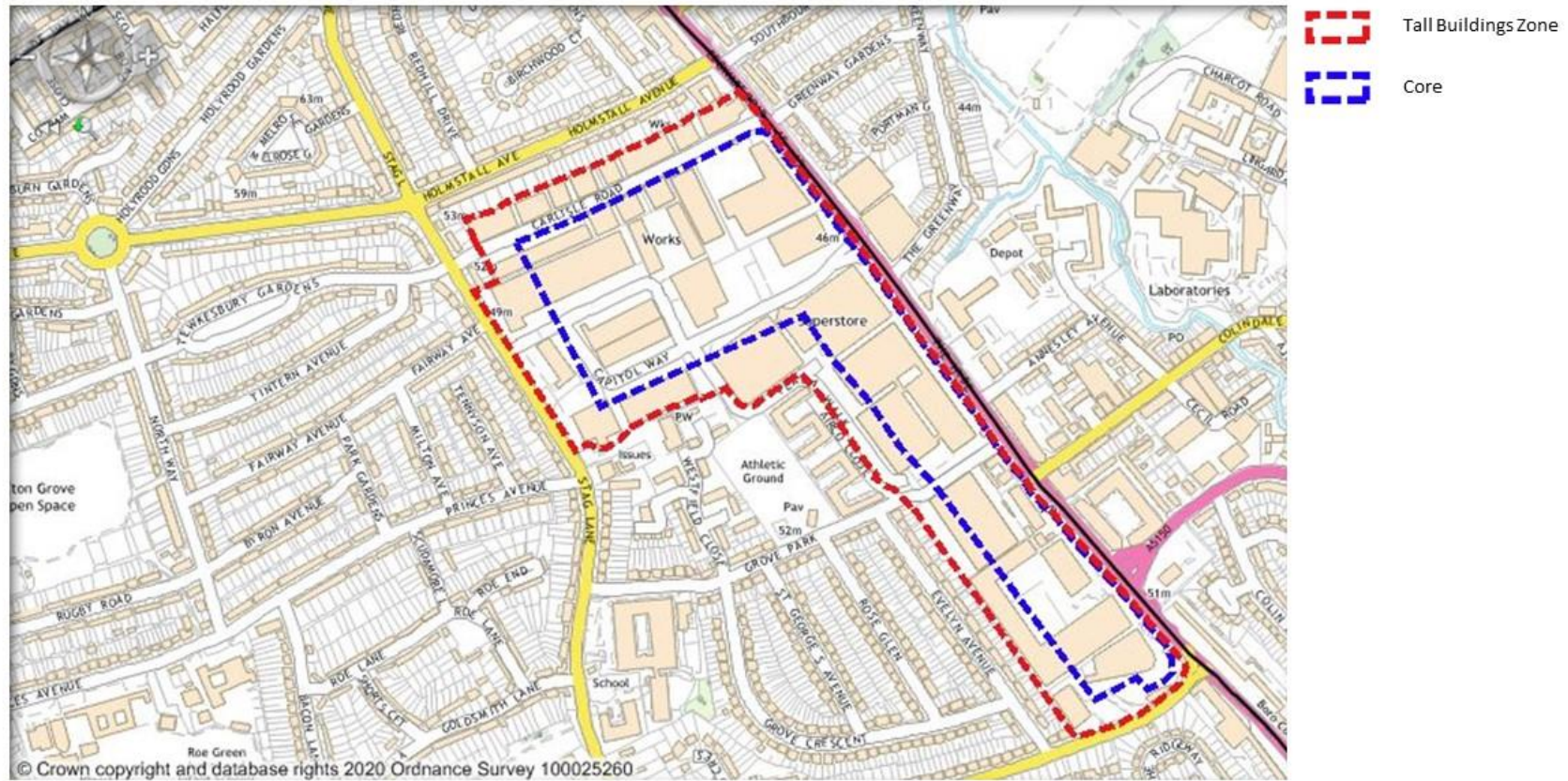
### Brent Draft Local Plan Regulation 19 Publication Version Tall Buildings Zone Colindale



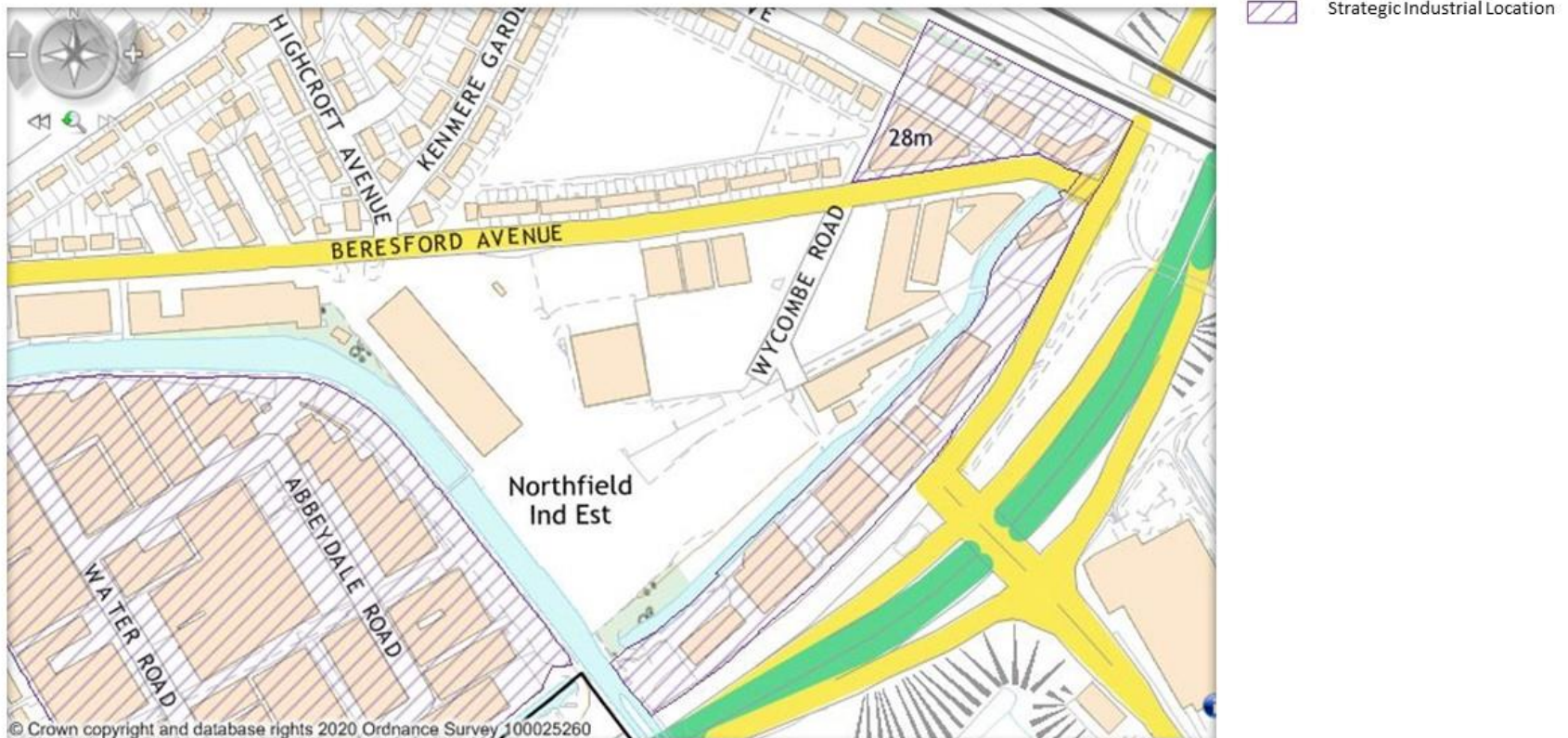
-  Tall Buildings Zone
-  Core



## Map Mod 9 Brent Draft Local Plan Submission Version Tall Buildings Zone Colindale Core Extended

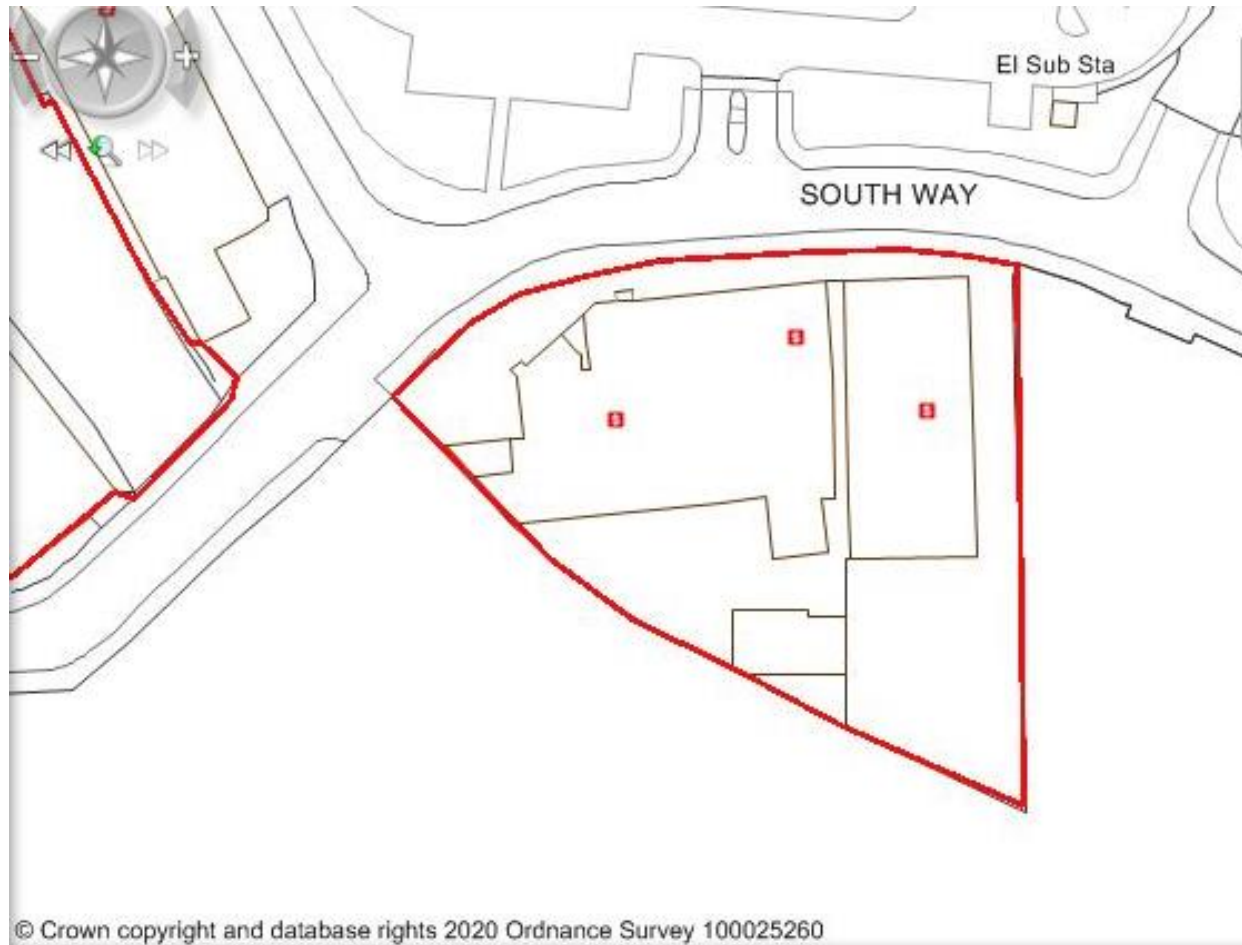


**Map Mod 12 Brent Draft Local Plan Regulation Submission Version Strategic Industrial Location Boundary – Removal of Northfields Where Principle of Residential Has Been Accepted Through Planning Permission 18/0321.**





Map Mod 13 Brent Draft Local Plan Submission version Site Allocation BCSA17 – Deleted as conflicts with policy BE2.



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## Other modifications to Local Plan supporting documents

Modification number	Document	Section	Proposed modification	Reason for modification
OM1	Infrastructure Delivery Plan	Transport, Roads.	Identify any highway schemes related to the M1 that become evident as the evidence base for the London Plan further addresses transportation impacts with inputs from Highways England.	Include information.
OM2	Infrastructure Delivery Plan		Update schedule to include additional infrastructure required prior to adoption of the Plan and for the infrastructure delivery plan to be updated on an on-going basis.	Reflects dynamic nature of the document.
OM3	Historic Environment Placemaking Strategy	Page 24	"...perhaps galvanised by residents' associations, <u>Local History Societies</u> or a neighbourhood..."	Reflects role societies have.
OM4	Historic Environment Placemaking Strategy	Page 25	Objective 3: Work with communities, <u>Local History Societies</u> and residents' associations to thematically identify potential candidates for the Local List, based on the Borough selection criteria.	Reflects role societies have.
OM5	Historic Environment Placemaking Strategy	Page 28 photograph adjacent to 9.11	"3 and 4 <u>5</u> Buck Lane...."	Accuracy
OM6	Historic Environment Placemaking Strategy	Page 36	"Iron age pottery found in 2013 on the site <u>of the former "Blackbirds" public house, underneath the Lidl supermarket</u> Blackbird Hill, Wembley"	Accuracy
OM7	Historic Environment Placemaking Strategy	Page 41	Objective 3: Work with communities, <u>Local History Societies</u> and residents' associations to thematically identify potential candidates for the Local List, based on the Borough selection criteria.	Reflects role societies have.