



Brent Council | Regulation 18 Consultation | November 2018

# LOCAL PLAN

## PREFERRED OPTIONS





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# FOREWORD

The London Borough of Brent has a proud history of diversity where communities have lived and worked together for decades. There has been much change over the last twenty years. Significant regeneration in Brent has attracted new residents, jobs, business, investment and visitors. This has all been made possible by the vision and direction Brent Council set in its planning policies, namely its Local Plan.

The new Local Plan for Brent is now being drafted to help set the vision for the built environment in Brent. It will set out London Borough of Brent's policies towards housing, town centres, open space, employment, community facilities, the built and natural environment and transport – all of which contribute to making Brent a vibrant place to live and work.

We're working hard to improve living standards, make Brent safer, cleaner and greener, support residents to be healthier and happier, and provide more opportunities to learn and work in the borough. This plan helps make this happen, by giving clear guidance; such as what can be built, where, how, for what use, where restrictions apply and why. We're committed to providing a high quality, responsive Planning Service, and realise how important it is to involve the community in helping us create a better Brent. That's why this powerful plan is the result of on-going community involvement.

The draft London Plan issued by the Mayor in December 2017 expects Brent to play its part in supporting London's continuing growth to 2041 and beyond. This provides some significant opportunities in terms of inward investment, but also undoubtedly challenges for Brent in the years ahead. The Local Plan is the document that will set out a long term vision for the borough,

improving places that could be better, delivering good growth whilst retaining those bits that are special.

Following public engagement in 2017 and 2018, this Preferred Options consultation continues the journey towards the adoption of the Local Plan. We have taken account of the extensive number of comments received. The draft plan seeks to achieve good growth by addressing the sometimes competing requirements of:

- planning for increased population associated with London's continuing success;
- community needs for additional affordable homes, jobs and inward investment whilst protecting and enhancing valued character and open spaces; and
- pressures on infrastructure such as schools, doctors' surgeries and transport.

It is essential that the residents of Brent are involved in this process of setting the council's planning policy. We encourage you to take this opportunity to participate in the process of shaping the future growth of the borough and the policies within the Plan. There will be further opportunities for public engagement before the Local Plan is finally adopted by 2020.

We look forward to meeting you at consultation events and receiving your views.

**Councillor  
Shama Tatler**  
Cabinet Member  
for Regeneration,  
Highways and Planning



1

# CONSULTATION OVERVIEW



- 1.1.1** The council has started work on a new Local Plan review. The Local Plan is a Development Plan Document. All planning applications must be determined in accordance with the Development Plan unless there are significant reasons for not doing so. The Plan is therefore a very important document in shaping the future development of Brent. The Local Plan period runs to 2041, consistent with the London Plan. This will provide a locally specific spatial policy framework for planning and development for the areas of the borough where the council is the local planning authority as shown in Figure 1.
- 1.1.2** Parts of the borough fall within the local planning authority area of the Old Oak and Park Royal Development Corporation (OPDC). (See Figure 1) OPDC's **Local Plan** deals with parts of the borough such as Willesden Junction and Park Royal. It is at a more advanced stage than the council's Local Plan with a timetable for adoption in 2019.
- 1.1.3** This consultation provides an opportunity to help shape the future of the borough. The Local Plan review will:
- Set out a long-term vision and objectives;
  - Provide a strategy for significant growth, delivering new homes, employment, facilities and infrastructure to meet the area's and London's needs; and
  - Include policies to manage change whilst protecting and enhancing the area's built and natural environment.
- 1.1.4** This version of the Local Plan is a draft document specifically produced for public consultation. This is an opportunity for you to comment on and shape Local Plan policy. It is your chance to make comments on what policies you think the Local Plan ought to contain. Throughout the document we have set out consultation questions to help stimulate responses but you can comment on any element of the draft Local Plan and its supporting studies.

## WHEN AND HOW TO RESPOND

- 1.1.5** The council will be undertaking the Local Plan consultation in accordance with its Statement of Community Involvement adopted in July 2017. The Local Plan review consultation will run for a six week period starting on **Thursday 8 November 2018**. The deadline for responses is **5pm on Thursday 3 Jan 2019**.
- 1.1.6** We would encourage you to provide your comments on the council's consultation website by completing the consultation questionnaire online at: [www.brent.gov.uk/shapebrent](http://www.brent.gov.uk/shapebrent) This is the quickest way of replying.

Alternatively you can email us or send us your comments by post by using the addresses below. When responding by e-mail or post, please use the Local Plan Consultation Response Form. Please set out clearly the page number, paragraph, policy, figure or image your comment relates to.

**Email:** [planningstrategy@brent.gov.uk](mailto:planningstrategy@brent.gov.uk)

**Post:** Paul Lewin, Team Leader Planning Policy, Brent Council, Engineers' Way, Wembley, HA9 0FJ

- 1.1.7** Please note that responding means that we will automatically notify you of future Local Plan related consultations unless you request otherwise.
- 1.1.8** All documents can be read and downloaded from:  
**www.brent.gov.uk/shapebrent**. Paper copies of this draft Local Plan and supporting documents (excluding the research studies which would result in a significant amount of printing) are available to view during normal opening hours at the following locations:
- Willesden Green, 95 High Road, Willesden NW10 2SF
  - Wembley Library, Brent Civic Centre, Engineers Way, Wembley, HA9 0AF;
  - Kingsbury Library, 522-524 Kingsbury Road, Kingsbury, NW9 9HE
  - Kilburn Library, Salusbury Road, Kilburn NW6 6NN
  - Harlesden Library, Craven park Road, Harlesden, NW10 8SE;
  - Ealing Road Library, Coronet Parade, Ealing Road, Wembley HA0 4BA
- 1.1.9** The libraries also have access to the council's website to allow you to view all supporting documents and make comments.

## DROP-IN TO A PUBLIC EXHIBITION OR WORKSHOP

- 1.1.10** The council will also hold a number of events/drop-in sessions within the borough to enable discussion and feedback of proposals in person. To find out about when these are happening please visit: [www.brent.gov.uk/shapebrent](http://www.brent.gov.uk/shapebrent)

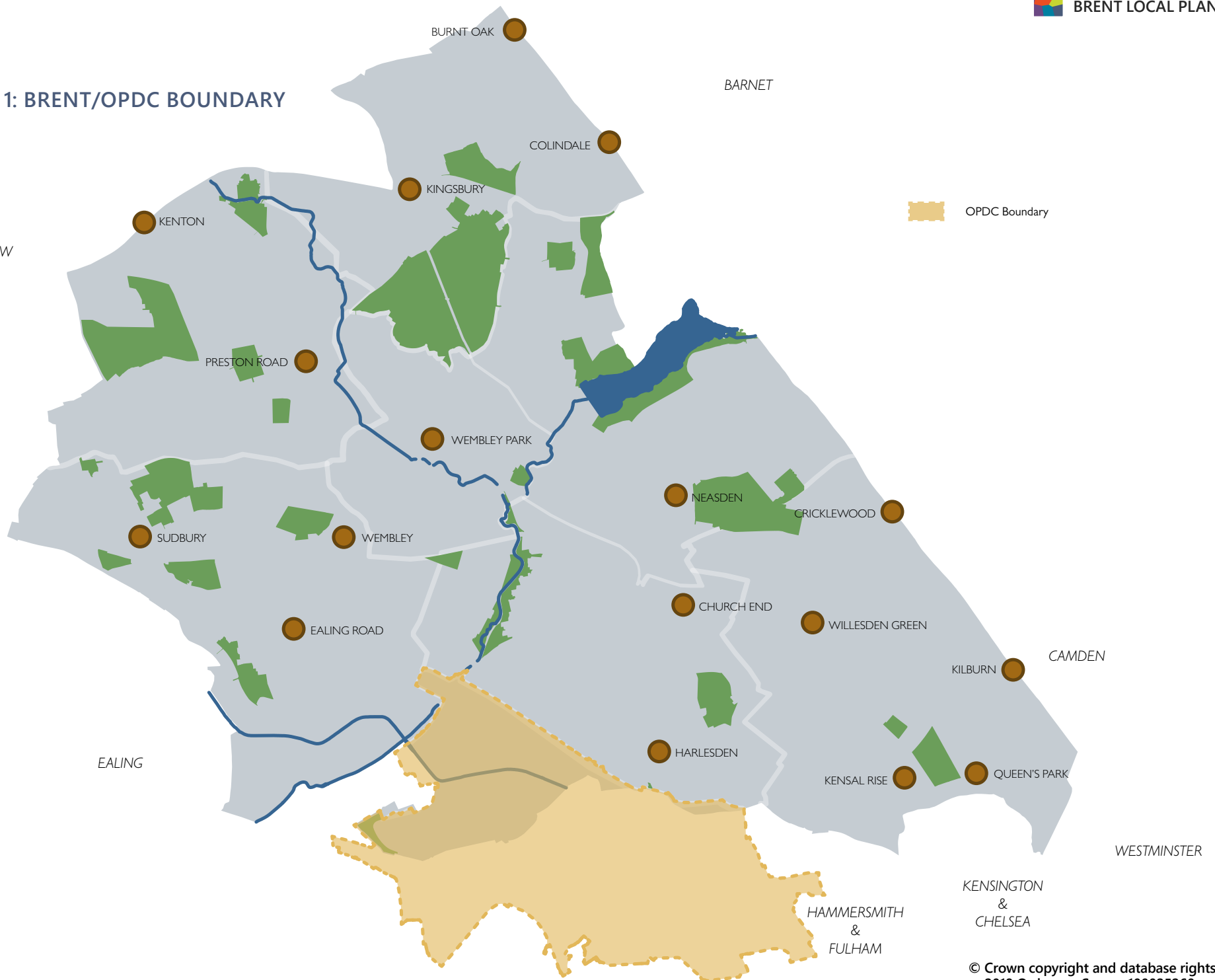
## WHAT HAPPENS NEXT?

- 1.1.11** Planning regulations set out the key stages in the preparation of the new Brent Local Plan review as shown in Figure 2. This also shows where we are currently in this process. The policies in the Local Plan must be 'consistent' with the National Planning Policy Framework and in 'general conformity' with the London Plan. Figure 3 shows the relationships between the various levels of policy documents.

FIGURE 1: BRENT/OPDC BOUNDARY

HARROW

BARNET



KENSINGTON & CHELSEA

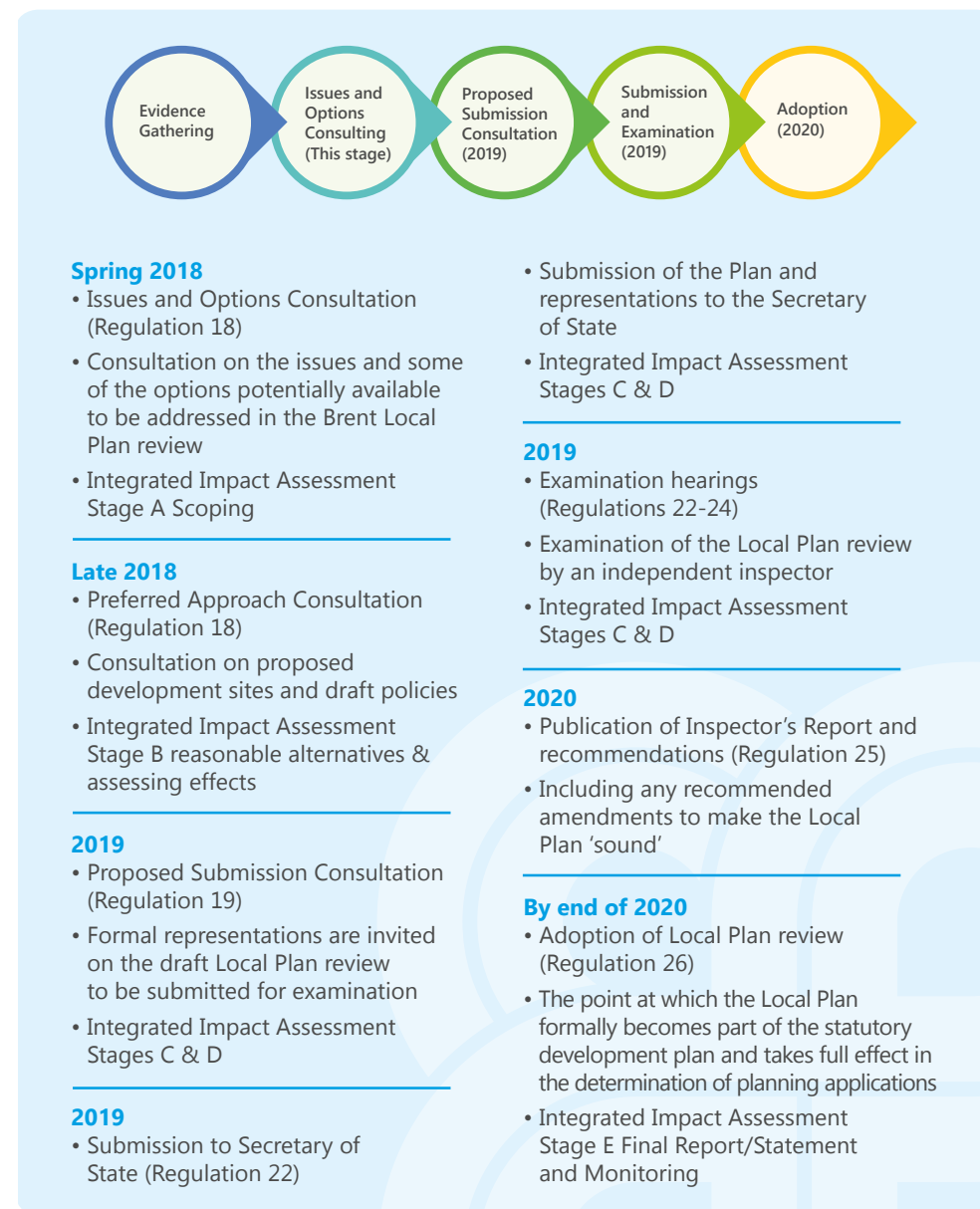
HAMMERSMITH & FULHAM

**1.1.12** All representations received to this Preferred Options consultation will be considered by the council, summarised and published for information. Taking account of the consultation responses and further evidence work, it will publish (Regulation 19) a Proposed Submission Brent Local Plan. This will be the Plan which the council ideally wants to adopt. This will also be consulted upon for at least 6 weeks in 2019. Comments at that stage must relate to the Plan's 'soundness', that it has been positively prepared, justified, effective and consistent with national policy.

**1.1.13** All representations and any proposed further amendments to the Plan will be submitted to the Secretary of State for examination by an independent planning inspector. The inspector will determine if the submitted Plan meets the required legal and procedural requirements, and when judged against national planning policy requirements the strategy and policies are 'sound'. Subject to the Plan being found sound, the council will then adopt it.

**1.1.14** All representations received on the Plan will be summarised and collated within a consultation statement to support the Local Plan at examination. At the publication stage and beyond individual responses will be published online and also be publicly available and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by the council in line with the General Data Protection Regulation 2018.

**FIGURE 2: LOCAL PLAN REVIEW TIMETABLE**





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# INTRODUCTION

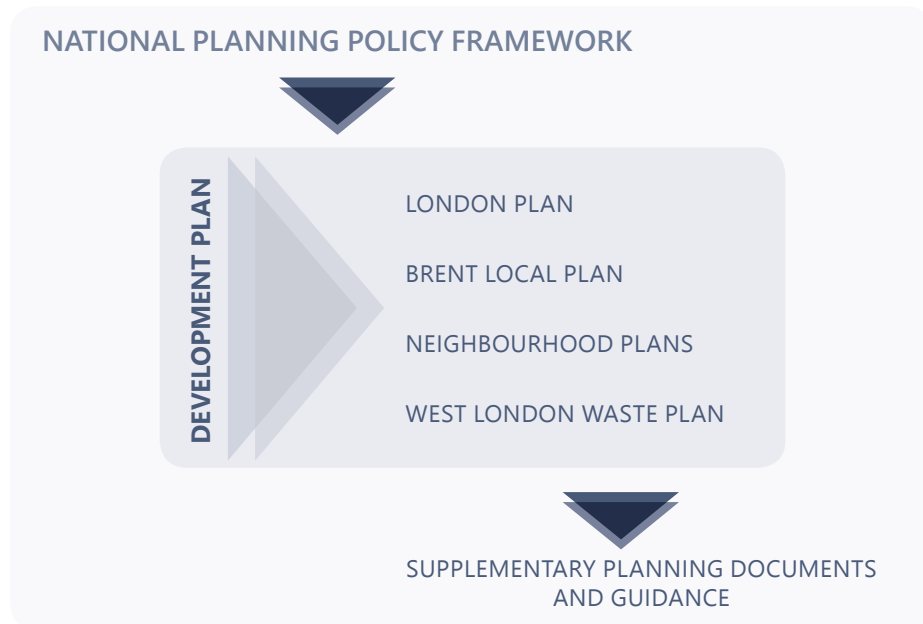
A photograph of the Willesden Sports Centre building. The building features a modern design with grey vertical panels and brickwork. A large, bright orange rectangular sign is mounted on the building's facade, displaying the name "Willesden Sports Centre" in a bold, grey, sans-serif font. The sign is positioned in the foreground, partially obscuring the building. The sky is clear and blue, and there are some trees and a paved path in the foreground.

Willesden  
Sports Centre

## WHY ARE WE REVIEWING THE LOCAL PLAN?

- 2.1.1** Brent's existing Local Plan comprises a number of documents that have been produced by the council:
- Core Strategy adopted 2010
  - Site Specific Allocations Document adopted 2011
  - Wembley Area Action Plan adopted 2015 and
  - Development Management Policies Plan adopted in 2016.
- 2.1.2** The Plan also includes the **West London Waste Plan** adopted in July 2015 and the **Sudbury Town Neighbourhood Plan** adopted in September 2015. The council is not currently proposing to review the Waste Plan as it is relatively up to date and being strategic is best prepared jointly with other London boroughs. Neighbourhood plans are not for the council to review; this is the responsibility of neighbourhood forums.
- 2.1.3** Figure 3 shows the relationship between layers of planning policy. In addition to the Development Plans, policies in the Plans are sometimes given more clarity on how they will be interpreted in Supplementary Planning Documents.

**FIGURE 3: PLANNING POLICY HIERARCHY**



- 2.1.4** Since the principal elements of the Plan were adopted (Core Strategy 2010, Site Allocations 2011), national planning policy and practice guidance has radically altered. There have been two fundamental changes in national policy, through the national planning policy framework. The most recent of these was in July 2018.
- 2.1.5** There have also been two significant changes to the London Plan. The 2008 London Plan was superseded in 2011, and consolidated with alterations in 2016. Significantly the borough's housing target increased from 1065 to 1525 dwellings per year. The latest **Draft London Plan December 2017** again proposes substantial additions; a target which is equivalent to 2915 dwellings per year from 2019/20 until 2028/29.
- 2.1.6** The borough, through the successful delivery of its Growth Areas in particular, has been able to accommodate the London Plan's more recent increases in dwelling numbers. It cannot continue to do so for the longer term, particularly if its target increases, without a radical review of its Local Plan. It is anticipated that the population will grow by 64,900 to 393,700 in the period to 2041. To accommodate this will require not only new homes, but approximately 30,300 new full time equivalent jobs to meet residents' needs, plus the associated improvements to social and physical infrastructure.
- 2.1.7** Whilst being ambitious about housing growth, the council has submitted representations that challenge the draft London Plan housing target. It does not consider it realistic for a variety of reasons. The council and this emerging Local Plan is planning for an increase above the current 1525 target. The amount of homes delivered will be maximised to that which can reasonably be achieved. This will balance housing delivery against other priorities and calls upon land, e.g. jobs, social infrastructure, open space and local heritage assets and character. The Local Plan review will consider other development needs and, where necessary, review and update current planning policies.

## IMPLICATIONS OF HAVING A DRAFT LONDON PLAN MOVING TO ADOPTION

- 2.1.8** Brent's Local Plan should be in 'general conformity' with the London Plan. For the most part Brent supports the contents of the London Plan. Key exceptions are the housing numbers set, particularly related to small sites and the policy approach to industrial land within the borough. The council has

objected to these elements of the London Plan. This draft Local Plan takes forward policies that are realistic and justifiable taking into account local circumstances. Should policies in the draft London Plan remain as is, then it might be necessary for the council to revise the draft Local Plan contents in light of the London Plan that moves towards adoption.

- 2.1.9** This preferred options version of the Local Plan refers to a number of policies within the draft London Plan. It assumes these for the most part will be adopted in a form that is not very different to the draft London Plan preferred modifications version issued in August 2018. Many of these policies provide detailed development management type criteria against which planning applications are assessed.

## WHICH EXISTING POLICIES WILL BE SUPERSEDED BY THIS LOCAL PLAN REVIEW?

- 2.1.10** The review is proposing to replace many of the existing Local Plan policies. It seeks to simplify the Plan and make it more understandable. The Issues and Options consultation responses indicated support for replacing the four separate Brent Development Plan Documents set out in paragraph 2.1.1 with a single document. A schedule of the policies that will be superseded/replaced and kept with or without amendments is set out in Appendix 1. In effect, it is largely the Development Management Policies that are being carried forward for incorporation into the new Local Plan with no or limited changes. The issues in other existing policies are:
- **either picked up in the London Plan;**
  - **no longer considered to be of such importance that they warrant inclusion; or**
  - **incorporated into new policies with significant wording changes.**
- 2.1.11** The weight that can be attached to the existing Local Plan compared to policies that emerge as part of the review will be dependent on a number of factors, including: the existing and proposed policy's consistency with national and London Plan policy; the level of support or objection to proposed policies and the stage that it is at within the adoption process. At this stage as policies within the draft Local Plan are in their early development, not yet subject to examination or a council resolution, it is considered that the weight that can be attached to them is likely to be limited in most cases.

## DUTY TO CO-OPERATE AND STATEMENTS OF COMMON GROUND

- 2.1.12** The Localism Act 2011 set out greater provisions to encourage public organisations and local councils to work together to plan properly for areas across borough boundaries. Consistent with this the council will produce evidence to show how it has conformed with the duty to co-operate and produce statements of common ground with neighbouring local planning authorities (Barnet, Ealing, Harrow, Hammersmith and Fulham, Kensington and Chelsea, City of Westminster and OPDC) throughout the various stages of the adoption of the Local Plan.
- 2.1.13** In considering what policies to contain in the Local Plan the council also has a statutory duty to have regard to Local Transport Authority policies, (which for London is Mayor's Transport Strategy), Articles 5 and 12 of the EU Directive 2012/18/EU on the prevention of major accidents and hazardous establishments (relevant to site allocations) and the national waste management plan.

## LAYOUT OF THE DRAFT LOCAL PLAN PREFERRED OPTIONS DOCUMENT

- 2.1.14** As indicated earlier, the London Plan contains many detailed strategic policies that are also intended for development management purposes. The Greater London Authority considered that this would be helpful so that councils can concentrate on locally specific issues which differentiate their areas from others. The National Planning Policy Framework and draft London Plan both emphasise that there is no need for Local Plans to repeat their policies. The Local Plan therefore follows this advice where it is considered national or London policy provides sufficient policy detail. The Brent Local Plan should be seen as complementary to be read in conjunction with the London Plan, National Planning Policy Framework and Practice Guidance and London Plan Supplementary Planning Guidance documents.

- 2.1.15** As such the structure of the draft Brent Local Plan is such that it obviously complements the Good Growth Policies and chapters of the London Plan. This is shown in Figure 4. The draft Plan has a brief spatial portrait of the borough, identifying some of the challenges and opportunities. This sets the scene for the following Spatial Vision for Brent, identifying locally specific examples of how the Good Growth Policies will be delivered in Brent either across the borough or through specific areas/ sites. In recognition of the fact that the borough is not homogenous, but is made up of a series of smaller places, the Plan splits the borough up and focuses on 7 'Places'. The extent of these Places is loosely based on a mixture of town centres that exert an influence within them, plus their character and clearly defined physical features which might effectively separate them from other identified Places.
- 2.1.16** For each of these Places there is an overview of matters such as physical features that define its boundary, a high level analysis of its current attributes, such as town centres, culture and character, transport, employment and education. The challenges and opportunities of the Place are set out. This helps inform a draft vision for the Place, Preferred Policy Options for matters such as such as culture and character, transport, employment and education, and town centres. In addition key Site Allocations are set out.
- 2.1.17** The draft Plan then sets out a general position statement in relation to new development in the borough, before using the same chapter headings as the draft London Plan to set out locally specific Brent policies on these matters.

## FIGURE 4 PROPOSED STRUCTURE OF THE BRENT LOCAL PLAN

### >> SECTION 1 **CONSULTATION OVERVIEW**

This section explains why the council is undertaking a public consultation and how this will help to shape the future of the borough, as well as providing guidance on how to respond and what will happen next.

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### >> SECTION 2 **INTRODUCTION**

The introduction sets out why we are reviewing the Local Plan, where the Local Plan sits alongside national and regional planning policy and the proposed structure of the Local Plan and its policies.

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### >> SECTION 3 **SPATIAL PORTRAIT**

The spatial portrait describes Brent and its surrounding area as well as the borough's population and historic development patterns. This section goes on to set out key challenges facing Brent across a number of different themes such as housing, transport and the natural environment.

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### >> SECTION 4 **SPATIAL VISION AND GOOD GROWTH IN BRENT**

The spatial vision sets out broad aims for Brent's development and outlines how the London Plan's six Good Growth Policies will be delivered in Brent.

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### >> SECTION 5 **PLACES**

This section splits the borough into seven distinct places, each of which will have policies tailored to meet the particular needs of their residents. Within each place section there will be a number of key sites allocated for development.

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### >> SECTION 6 **THEMES**

This section is based on the themes in the new London Plan, and aims to add detail to those policies where Brent's needs differ from those of London as a whole.

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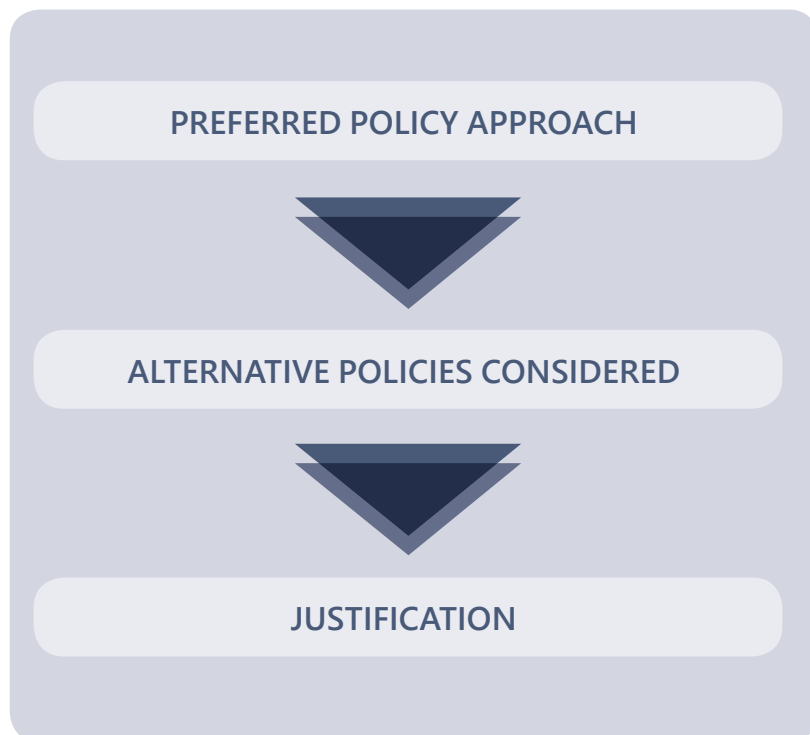
### >> SECTION 7 **DELIVERY AND MONITORING**

The final section explains how Brent will meet its housing targets set by the Greater London Authority, funding mechanisms, and the key indicators and targets used to monitor the planning process.

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**2.1.18** Within each chapter at its start, the draft Local Plan sets out the policy themes covered and invites suggestions on additional policies that may be required. Individual preferred policy options are set out. Where there are realistic alternatives these are also set out, or reasons why it is considered that there are no realistic alternatives. We are inviting thoughts on whether other reasonable alternatives exist as well as the preferred policy option. Figure 5 sets out how the preferred policies are structured. For the next draft, the proposed submission plan, the alternative options will be removed. This should improve the brevity of the adopted Plan.

**FIGURE 5 PREFERRED POLICY OPTION LAYOUT**



## SUPPORTING EVIDENCE BASE DOCUMENTS

**2.1.19** The draft plan is supported by a series of evidence base documents, some of which are still in draft form. Others might need to be commissioned to further support policies where consultation indicates it is required, or where there are changes in circumstance or proposed policies as the plan moves forward. The draft Plan identifies 'key evidence' where relevant. We are also inviting comments on these supporting documents.

**2.1.20** The Integrated Impact Assessment (IIA) is a document of particular importance. It fulfils the statutory requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (Directive (2001/42/EU) and associated UK Regulations). It also fulfils the requirements for Health Impact Assessment and Equalities' Impact Assessment. All draft Local Plan policy options, including the alternative policy options, have been appraised in the IIA.

**2.1.21** The scope of the IIA was subject to consultation at the Issues and Options stage. The council worked closely with statutory consultees and other interested parties in setting out the scope and objectives within the IIA against which to assess the contents of the draft Local Plan.

**2.1.22** A Habitats Regulation Assessment (HRA) Screening exercise has been carried out in accordance with European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive'). This is to determine whether the emerging content of the draft Local Plan will generate an adverse impact on the integrity of a 'Natura 2000' site. For Brent, these sites are Richmond Park and Wimbledon Common.

# 3

# SPATIAL PORTRAIT



- 3.1.1** The London Borough of Brent covers an area of 4,325 hectares - almost 17 square miles, between inner and outer North West London. It extends from Burnt Oak, Kenton and Kingsbury in the North, to Harlesden, Queen's Park and Kilburn in the South.
- 3.1.2** The borough is famous for being the home of the National Stadium at Wembley; an internationally renowned venue, principally associated with football, but also other sporting events and concerts. This was rebuilt and reopened in 2007 and its distinctive 315 metre wide and 133 metre high arch is visible across London.
- 3.1.3** Brent is bordered by the London Boroughs of Barnet to the east, Harrow to the north and Ealing to the west. It has small boundaries with the inner London Boroughs of Hammersmith and Fulham, Kensington and Chelsea, Westminster and Camden in the south. It also has a boundary with the Old Oak and Park Royal Development Corporation. This is the Local Planning Authority for parts of Brent, Ealing and Hammersmith and Fulham within the Old Oak and Park Royal Opportunity Area. This reduces the area of Brent where the council is the Local Planning Authority by approximately 200 hectares.



- 3.1.4** Overall, Brent's population is relatively young with over a quarter of its residents aged 19 years or under. In 2018 Brent's population was 336,859. As is common with most of London, this has been subject to extensive increase, rising by 28% since 2001. Black and Ethnic Minorities collectively constitute the majority of Brent's population at 64%. With over 149 languages being spoken, it is recognised as one of the most ethnically diverse places in England. Brent's successful designation as London Borough of Culture 2020 was principally on the basis of its people and activities they undertake.
- 3.1.5** The fortunes of all parts of the borough depend now, as much as ever, on the prosperity of London as a whole. London's success and position as a leading world city has meant that there has been significant investment in the borough more recently. It also points to continued likely significant increases in population and growth in its economy. In Brent therefore the future would appear to be a positive one of planning for growth and the challenges and opportunities that this might bring, particularly in improving the prospects of its residents and businesses.

## SPATIAL DEVELOPMENT PATTERNS

- 3.1.6** The borough in terms of its character can essentially be split into two; north and south of the North Circular Road. The south was substantially developed between 1890 and 1910. This saw the addition of terraced houses for workers in industry and services, as well as a small number of estates of larger houses around Kilburn. Characteristic of most development of this time, densities are reasonably high with residential and non-residential uses more likely to be mixed together. Open space is more limited in terms of its scale of provision and more likely to be focused in formal spaces such as parks.
- 3.1.7** The north of the borough was predominantly built out in the 1920s and 1930s as 'metroland' accompanying the growth of rail and underground services. This was essentially of a lower density residential suburban nature. It has greater segregation of land uses; planned more around movement by car with more generous incidental open space, tree planting and parks and open spaces.
- 3.1.8** Brent's economic base, especially its town centres, other office locations and manufacturing sector have been subject to extensive restructuring and rationalisation. In the period 1971-2008 approximately 26% of jobs were lost in the borough<sup>1</sup>. Spatially this resulted in vacant and underused land and

<sup>1</sup> London Boroughs: Borough by Sector, Jobs, Date and Methodology GLA Economics Working Paper 92



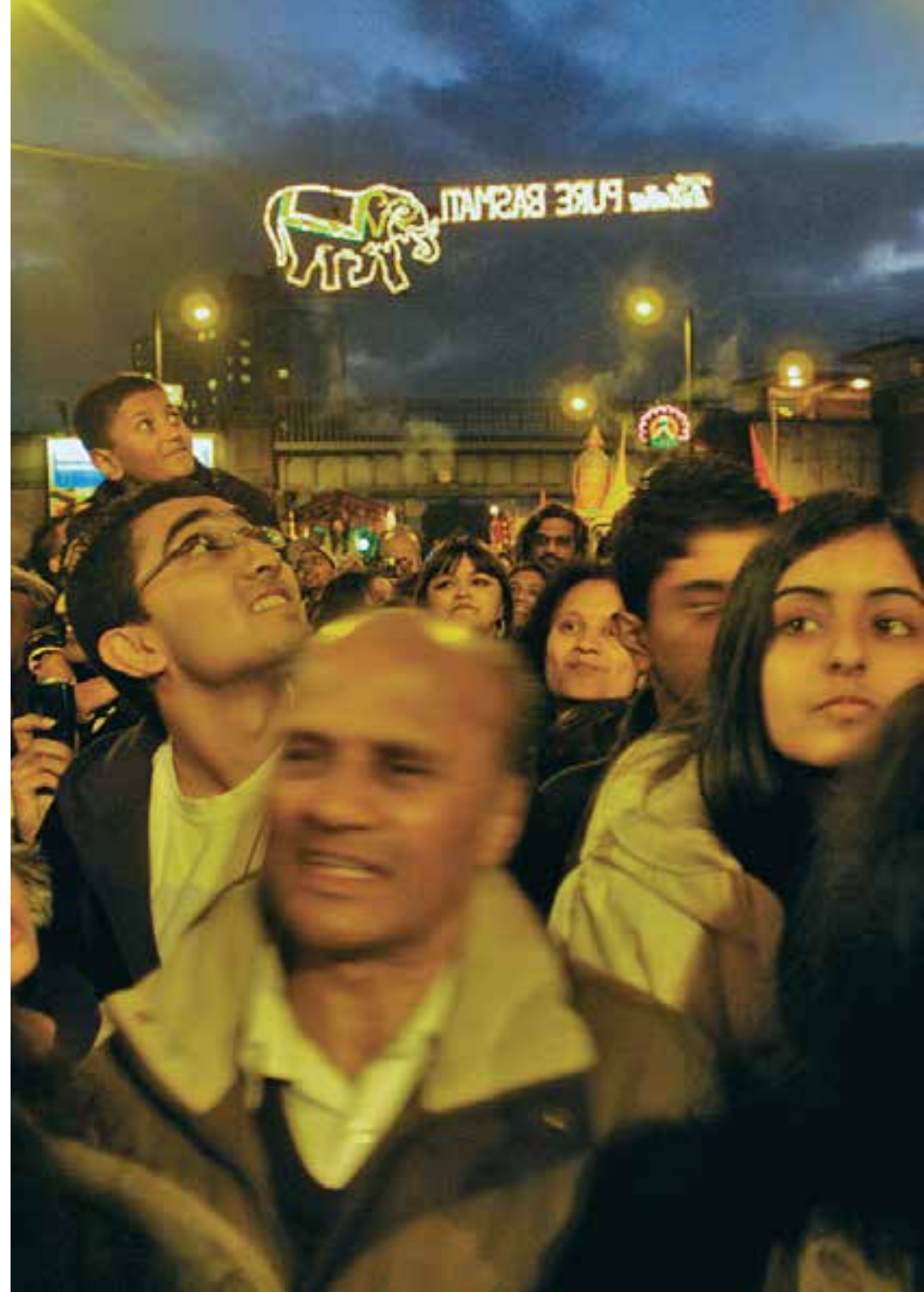
buildings needing to be addressed through regeneration and repurposing. In addition, the housing, environment and quality of life on numerous council estates was so poor that the only realistic solution was wholesale regeneration. This started to occur in earnest in the mid/late 1990s. For some estates such as Stonebridge, this is a process that is now coming to an end, although others still require improvement.

**3.1.9** Taking account of these factors the principal focus on development activity over the last decade or so has been within Brent's Growth Areas: Alperton, Burnt Oak/Colindale, Church End, South Kilburn and Wembley. These areas have delivered the majority of new homes and jobs required to support population growth. There are however still employment and residential areas that are not reaching their full potential in a manner consistent with the criteria that were used in identifying the current Growth Areas. This points to new large scale regeneration opportunities within, adjacent to, or through the creation of new Growth Areas.

**3.1.10** The borough's town centres, although continuing to provide a local service, are losing market share to adjacent centres. Some of these such as Westfield Shepherd's Bush or Brent Cross contain retailers' flagship stores, have or are about to expand significantly, and are climbing up London's retail hierarchy. The extent of the challenge of these competing centres is such that despite the opening of the extensive London Designer Outlet in 2015, Wembley's market share of Brent residents' spend has continued decline over the last decade.<sup>2</sup>

**The challenges are to:**

- **encourage comprehensive planned regeneration of Brent's existing and new Growth Areas to provide high quality mixed use environments**
- **overcome the blockages that have meant some Growth Areas have not been subject to the levels of investment/ growth that was anticipated, e.g. Church End**
- **better meet Brent's shopping needs locally within the borough by improving town centres, whilst facing market realities and recognising managed reductions in the size of some centres will undoubtedly be necessary**



## DESIGN

**3.1.11** The council has more recently placed a greater emphasis on improved design in recognition of the value that it creates in improving quality of life and the likely recurrence of significant problems. It has updated its design guidance, provided better design advice in masterplans and requires the use of a design review panel on major developments.

**3.1.12** It has also led by example on developments such as the award winning regeneration of South Kilburn. This has sought to improve housing quality and standards, providing accessible and inclusive high quality design in a high quality public realm. Tall buildings have historically been rare in Brent, but have started to appear in greater numbers. The area around Wembley has previously been specifically identified as a preferred location, with additional potential in some of the Growth Areas. The need to provide additional homes and jobs, aligned with policies in the London Plan has required higher densities in many areas. Increases in number of homes and the amount of employment floorspace required to meet future population will mean that this trend will need to be continued. This will create areas with a different character to the adjoining suburban areas, but which will need to complement, rather than undermine them.

### The challenges are to:

- **continue to make good design the norm and raise overall quality**
- **identify where tall buildings are appropriate and their acceptable heights**
- **create high quality, mixed use higher density environments that fit well into the surrounding suburban context**
- **manage potential for evolution of character of some suburban locations which are not designated heritage assets**

## HOUSING

**3.1.13** Over the past 5 years Brent has delivered 8,351 additional dwellings of which 1,507 were affordable. The draft London Plan requires Brent to provide 29,150 new homes from 2019/20 to 2028/29. This is equivalent to one new home being built for every 4 that exist currently. Brent has a high degree of household over-crowding (29.6%). As such there is a need for larger family accommodation, with 65% of additional homes needing to be 3 bedrooms

or more. The affordability of homes is a significant issue with the average house price now 15 times the average income. 2,945 households are living in temporary accommodation. This points to an identified need for 52% of new homes to be affordable, particularly those at or around the equivalent of council housing rent levels.

**3.1.14** There has been a 65% increase in number of households in privately rented homes in the last decade, with now over 30% of households in that accommodation<sup>3</sup>. Most of this has historically been provided through small-scale landlords, with varying degrees of quality. Larger institutions are now becoming significant investors in private rent and the majority of Wembley Park will be delivered through this model. It is estimated that approximately 14,500 homes are Houses in Multiple Occupation<sup>4</sup>; homes shared by two or more households. Whilst this clearly meets a housing need, particularly high concentrations can cause concerns to residents through adverse environmental and anti-social behavioural issues. The population of Brent also includes many older people, this will bring the need for specialist housing to meet their needs. Good connections to central London have resulted in investment in student accommodation and the indications are that there will be sustained demand for additional bedspaces.

**3.1.15** In moving forward there will be a need to provide mixed and balanced communities. This will build better social cohesion and improve residents' health and life quality. Such communities are less likely to require future large scale intervention in terms of large-scale demolition and rebuild as is currently occurring on the South Kilburn estate.

### The challenges are to:

- **meet and ideally exceed the final adopted target as set out in the emerging London Plan, comprising more affordable and more family housing to meet Brent and also wider London needs;**
- **ensure development that is mixed in use and mixed in tenure; and**
- **regenerate existing poor quality housing stock.**

## SOCIAL INFRASTRUCTURE

**3.1.16** Over the last 20 years much of the borough has undergone significant regeneration, improving prosperity and life chances. There are however parts

<sup>3</sup> ONS Census 2011 Brent Profile

<sup>4</sup> Brent SHMA August 2018 ORS

that still suffer high levels of social and economic disadvantage. Nationally, Brent is ranked 68<sup>th</sup> most deprived out of 356 areas in the Indices of Multiple Deprivation (IMD) 2015<sup>5</sup>. The neighbourhoods experiencing the highest levels of deprivation are largely located in the south around the Harlesden, Neasden, Stonebridge and South Kilburn areas. South Kilburn which has and will continue to undergo extensive change has been recognised as a model for estate renewal. The diversity of the population however also gives rise to specific needs. These include providing a wider range of community and cultural facilities.

**3.1.17** In terms of education, the borough does record an above-average share of pupils achieving five or more GCSEs at grades A\* to C. 97.5% of primary and secondary schools in Brent have been graded as Good or Outstanding by Ofsted. <sup>6</sup> There has been extensive investment in school capacity recently which has resulted in sufficient primary school places available for the short to medium term. There are however projected shortages of space for secondary pupils which will require provision of the equivalent of two additional secondary schools by 2023/24.

**3.1.18** Despite its more recent good GCSE attainment, Brent in fact has a low 'skills' profile for working-age residents. Over one third of the working-age population falls into the 'skills poverty' category (below NVQ Level 2), with only a small share (40%) into the high-skills' category (NVQ Level 4 or above) relative to the London average (52%).<sup>7</sup> As such there is a need to provide further education for the working-age residents to help uplift to the economic base of the borough. A reported 10,900 working age people in Brent are unemployed. At 6.3% this is higher than the 5.3% for London as a whole. As such there is a need for additional jobs, but also a greater link between those jobs, local employment schemes and strategies to improve Brent's skills base.

**3.1.19** In terms of health, Brent has some headline challenges. For example 38% of children aged 10-11 are classified as overweight/ obese. 33% of the population are inactive, which is amongst the highest in England (305 worst out of 326) and more than twice as high as Camden.<sup>8</sup> It is anticipated that

these characteristics will contribute to 15% of the population having diabetes by 2030.<sup>9</sup> In terms of indoor sports facilities, provision is significantly below needs. Swimming pools are between ¼-½ of the provision per head of population in adjacent boroughs<sup>10</sup>. This under provision is partly reflected by the levels of sports participation and physical activity across the borough.

**3.1.20** Acute health care in Brent is primarily provided at Northwick Park and Central Middlesex Hospitals. These suffer from capacity issues related to dealing with non-acute cases and bed-blocking. Brent Clinical Commissioning Group is aiming to create a capacity shift in care settings, with primary and community care settings taking on more services from the acute setting. This will be through a number of changes, including: local hospitals offering a range of out of hospital services; hubs/health centres offering a range of services; and networks of care, formed of GP practices enhancing the capacity of primary care to delivery out of hospital services. There needs to be improved care of older people with appropriate support so that they can leave hospital earlier when no longer needing acute care. There will also be a need to amalgamate and provide better premises for existing practices so that they can better meet health care needs of an expanding population.<sup>11</sup>

**The challenges are to:**

- **ensure suitable places particularly for secondary education in new and existing schools are provided when needed;**
- **provide health care facilities that will meet current needs whilst having the capacity to expand for growth generated by new developments; and**
- **ensure that the provision of social infrastructure meet the needs of our diverse community against a background of significant population growth.**

5 2015 English Indices of Multiple Deprivation 2015 Data for London MHCLG

6 2017 Brent School Place Strategy 2014-18 Update June 2017

7 2017 ONS Annual Population Survey

8 Sport England Active Life Survey 16-17

9 Brent Better Care Fund Plan 2017-2019 Brent Council and Brent CCG 2017

10 Sport England National Facilities Planning Model 2017

11 Brent CCG Estate Strategy 2015

## ECONOMY

- 3.1.21** There are now 141,000 jobs in the borough.<sup>12</sup> Since 2008 job numbers have started to rise. This follows a significant decline (27%) in the number of jobs in Brent from 1971 to 2008, reducing the loss percentage from 1971 to now to 17%.<sup>13</sup> Brent's economy diverges from the rest of London. This has an impact for employee earnings. The average weekly wage is £576.20, well below the London average of £692.50. Brent has a greater reliance on manufacturing, wholesale and retail trade/car repairs, transport and storage and human health and social work activities. It has much less representation than London in white collar jobs, in particular in professional, scientific and technical activities.
- 3.1.22** Brent has good connections to central London. Like many outer London boroughs however it has not more recently been recognised as an investment priority as an office location. The majority of office development activity has been associated with the loss of space, most of which was effectively redundant, through conversion to residential use. The exception to this in terms of new provision is at Wembley Park where new high grade offices have or are being built. Much of this space has accommodated existing occupiers moving out of old stock, rather than attracting new firms to the borough. The council has introduced an Article 4 direction to prevent inappropriate development of office and employment uses to residential that could undermine the area's economic performance.
- 3.1.23** Although it has not been subject to high levels of recent investment, the remaining industrial stock currently appears generally fit for purpose for the businesses occupying it.<sup>14</sup> There are low levels of vacancy. The environmental quality of industrial areas is generally poor and something to be improved to encourage investment from firms in sectors that are not well represented in Brent. Due to large-scale releases of employment land, shortages of space across London are starting to push up demand. At a West London level, due to predicted demand, the Greater London Authority has identified that Brent should 'provide capacity' for industrial floorspace. The borough does have an entrepreneurial population; VAT registrations indicate a growth in companies that is 60% above the London average. It is anticipated that overall the number of jobs in Brent will increase by 0.39% or 550 jobs per year.<sup>15</sup>

### The challenges are to:

- **better meet Brent's shopping needs locally within the borough by improving town centres, but facing market realities and recognising managed reductions in the size of some centres will undoubtedly be necessary**
- **retain or deliver lower cost office/ employment premises to assist small business creation/ development;**
- **improve the efficient use of land and increase the amount and quality of the industrial stock and the environment of industrial areas to help maintain jobs and improve their provision and numbers; and**
- **assist residents in accessing higher quality jobs through training and pathways into work.**

## HERITAGE AND CULTURE

- 3.1.24** As indicated, much of Brent's development occurred in the interwar years. As such compared to many inner London boroughs which were extensively built prior to then, it does not have a high number of designated heritage assets. It has just over 200 nationally listed buildings, a small number of archaeological sites and 22 conservation areas, which cover approximately 7% of the borough. The National Stadium is a cultural icon but currently has no designated heritage asset status. A number of views of the stadium are locally protected so that it retains its prominence.
- 3.1.25** Brent's recent rich cultural diversity is reflected in particular through the recent addition of a number of highly crafted places of worship, the largest and most recognised of which is Neasden temple. Whilst it does have some other recognised features such as cultural buildings and Wembley and Kilburn's night time economy, Brent's designation as London Borough of Culture 2020 was principally on the basis of its people and activities they undertake. Cultural and creative spaces face significant financial challenges, difficulties finding new sites together with potential displacement from competing higher value land uses.

### The challenges are to:

- **ensure that all development is of a high design quality and constructed**

<sup>12</sup> ONS Jobs Density 2016 via Nomis Labour market Profile

<sup>13</sup> London Boroughs: Borough by Sector, Jobs, Date and Methodology GLA Economics Working Paper 92

<sup>14</sup> Brent ELR 2015 AECOM

<sup>15</sup> GLA Employment Projections by Borough 2017



FOODHALL  
SELFRIDGES

**from quality materials, reflecting the need to preserve or enhance heritage assets and the character of places; and**

- **that sufficient places exist for the cultural diversity of the population to be able to be accommodated and ideally showcased**

## GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT

**3.1.26** Brent has a limited number of nationally recognised ecological and built-environment designations. It has a Site of Special Scientific Interest at Brent Reservoir and Local Nature Reserves at Welsh Harp, Fryent Country Park and Mason's Field. In addition it has Sites of Importance for Nature Conservation, which mostly follow linear transport corridors, such as railway lines and the Grand Union Canal.

**3.1.27** Currently when compared to London standards, overall the borough lacks open space, particularly in the south. The quality of provision also varies. Whilst Brent has some parks and open spaces recognised as being high quality to be able to attain the green flag standard, it also has some that don't perform so well.<sup>16</sup> A growth in population will provide additional challenges with regards to accessibility standards. New development will provide opportunities for investment, improving the setting and use of existing spaces. Nevertheless, additional open space will also be required in association with new developments and on strategic development sites in particular.

**3.1.28** As with the provision of indoor sports facilities, for a borough that hosts the National Stadium, the provision of outdoor sports facilities to which there is access by the general public is weaker than it should be. Improvements are needed for the provision of football pitches and tennis courts.

### **The challenges are to:**

- **provide a greater range of open space and outdoor sports facilities for the growing population through maintaining and improving existing and providing additional facilities; and**
- **develop an approach which can accommodate a population increase through provision of some new spaces and not compromising important open space and ecological designations**

## SUSTAINABLE INFRASTRUCTURE

**3.1.29** Climate change threatens to damage our natural and built environment. Much of Brent is covered by an Air Quality Management Area, principally related to pollution caused by vehicles. Homes and businesses in parts of the borough adjacent to the River Brent are also under potential threat of flooding. Surface water and sewerage flooding as a result of extreme rainfall events are also a risk. More predicted extreme environmental events have to be taken into account in the design of new development. Predicted rises in temperature potentially will create overheating of buildings and places.

**3.1.30** Brent must develop an approach which can accommodate a population increase without exacerbating existing localised environmental problems. Related to design it is important to deliver high quality buildings that reduce the need to use natural resources in the longer term, and deliver spaces and green infrastructure to build a sustainable and enduring environment.

**3.1.31** As well as the buildings, landscape and public realm plays an important part in improving environmental quality, e.g. tree planting, Sustainable Urban Drainage systems and living roofs. The same is true of the future use of resources (energy, water and waste) in balancing population growth and ensuring a good environmental quality. Securing on-site renewable technologies, drainage technologies to reuse and recycle water, sustainable waste facilities to recycle and recover waste, is important for all developments. It will reduce longer term costs to residents and businesses and also the need find sites to manage and dispose of waste.

### **The challenges is to:**

- **ensure that all new developments incorporate sufficient features and associated infrastructure to help reduce the potential for and the need to adapt to climate change.**

## TRANSPORT

**3.1.32** Overall Brent is well connected with good transport links including more rail and underground stations than any other borough in London, with many bus routes which serve town centres within and outside the borough. Whilst to the south access to public transport is high, for some areas to the north accessibility is very low. This combined with good access to radial and orbital

roads especially the Strategic Road Network means that northern parts of the borough have a greater reliance on the car. The North Circular Road is a significant road for London and is important for business connectivity in Brent. It however is severely congested at peak times. It has significant adverse impacts on communities in terms of severance, pollution and noise. Its use as the boundary of the extended Ultra-Low Emissions Zone to be introduced in 2021 is unclear in terms of potential changes on these adverse impacts.

**3.1.33** Strategic transport improvements will occur adjacent to the borough at Old Oak with the provision of a HS2/ Crossrail interchange station (2026), a new station at Brent Cross West Thameslink (2023) and potentially the West London Orbital with an additional station at Neasden (2026). These will increase public transport accessibility and use and provide focal points for development in the adjacent areas. More recently in areas with good access to public transport, the council and developers have been promoting car free developments. This trend will continue with better management of on-street car parking to encourage alternatives to car use and reducing unnecessary short trips.

**3.1.34** Much investment is still needed to improve stations and their respective interchanges with other modes, but particularly to improve service frequency. In order to stimulate the necessary regeneration, as well as provide for the demand created by new development, it is important that public transport services are of a good quality and are able to meet the needs not only of residents, but of visitors and those working in the borough. The Mayor has indicated greater prioritisation of investment in bus services in outer London to support growth. Furthermore, accessibility to these transport links should be combined with safe walking and cycling routes in order to enhance the usability of Brent's transport infrastructure and its sustainability.

**3.1.35** In addition to these common transport modes, Brent also has the Grand Union Canal which can be promoted as a means of passing freight through and to the Park Royal area. This can also be combined with walking and cycling routes to increase its usability by residents, visitors and those working in the borough.

**The challenges are to:**

- **encourage housing and commercial growth without increasing the reliance on private cars for journeys which originate within the borough;**

- **encourage new developments that will have good access to public transport;**
- **improve and increase safe walking and cycling routes to encourage their and public transport use within and to Brent;**
- **improve and encourage the use of the canal system for freight and transport to and from the Park Royal area, and**
- **support the delivery of the West London Orbital passenger route and associated infrastructure.**

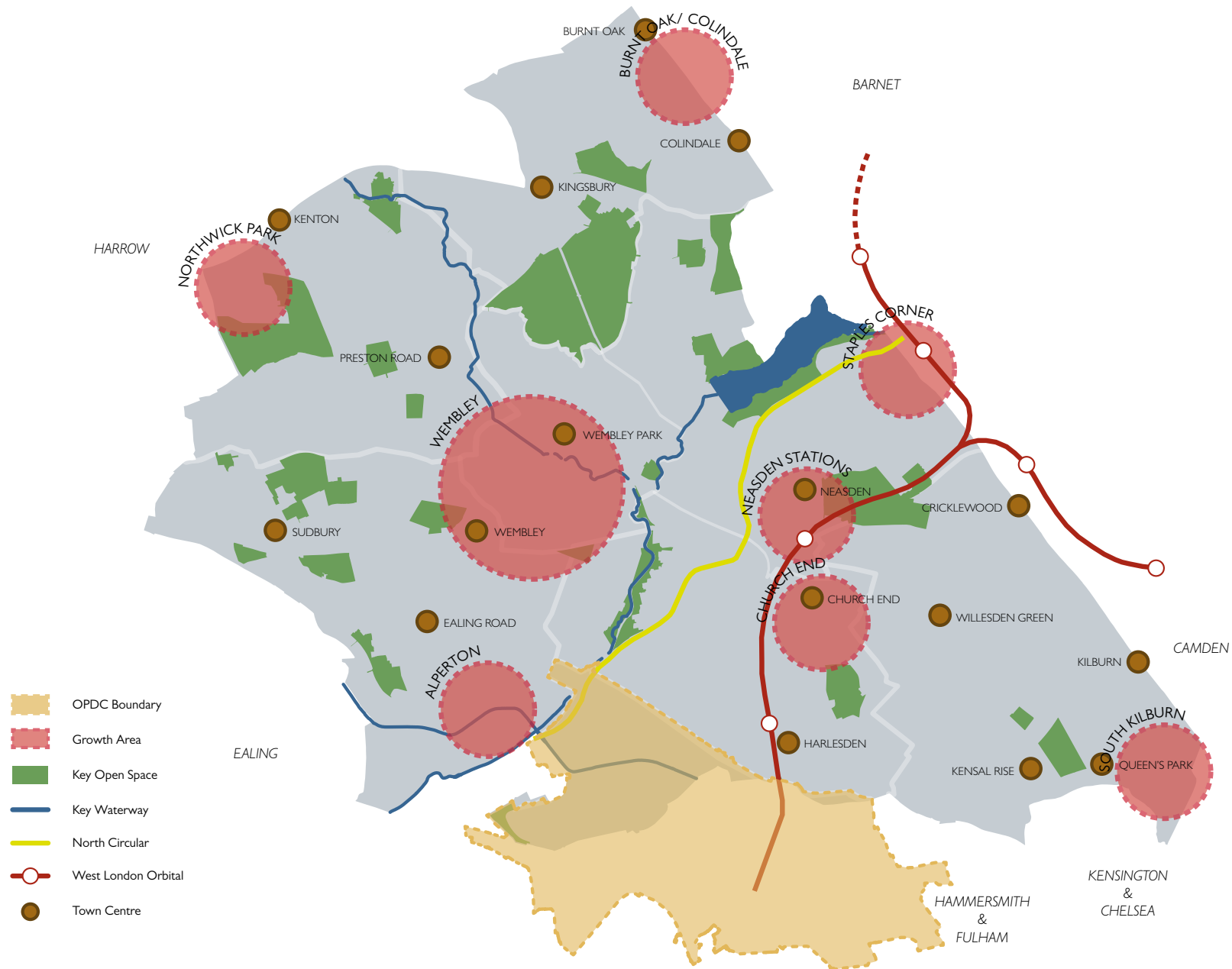
## DEVELOPMENT PARTNERSHIPS AND INFRASTRUCTURE

**3.1.36** In terms of planning for the future, the council must work and liaise with providers of social and physical infrastructure, such as Network Rail, Transport for London, utilities providers and its neighbouring boroughs and developers in order to achieve the right spatial arrangement of infrastructure as the borough's population grows. Catchment areas of schools and healthcare facilities tend to cross borough boundaries, therefore working with neighbouring boroughs as well as education services and health providers is prudent. Outside of its housing estates, the council has relatively little in the way of a property portfolio that can be regarded as developable land which would allow it to exert control as a landowner. It therefore needs to work together with strategic development partners (as is happening at Wembley) such as the Greater London Authority, Transport for London, NHS, home builders and Registered Providers (RPs) to bring forward regenerative development and secure appropriate infrastructure.

**The challenges are to:**

- **work with neighbouring boroughs where there is an overlap in infrastructure use; and**
- **build strategic partnerships with developers and other agencies to bring forward beneficial development with appropriate infrastructure without having control through land ownership.**

# 4 SPATIAL VISION AND GOOD GROWTH IN BRENT







# SPATIAL VISION: ACHIEVING OUR POTENTIAL

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

This Local Plan will ensure a future built for everyone through regeneration to grow the local economy and provide the jobs, homes, transport, green spaces and cultural assets that people need.



## HOW WILL GOOD GROWTH IN BRENT BE DELIVERED?

**4.1.1** The draft London Plan includes six Good Growth Policies that set out the fundamentals on which development in London should deliver. In Brent highlights of how these will be addressed in relation to places are:

### STRONG AND INCLUSIVE COMMUNITIES

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

### MAKING THE BEST USE OF LAND

- **Prioritising development in new and more efficiently and intensively developed Growth Areas such Northwick Park, Staples Corner and Neasden and continuing to deliver in those that have already been started, such as Alperton, Burnt Oak/Colindale, Church End, South Kilburn and Wembley to enhance environmental quality, and bring benefits to the community**
- **Supporting higher density development in Brent's town centres and in areas with good accessibility to public transport,**
- **encouraging greater access, recreational use and also understanding of ecology in Brent's extensive areas of open spaces, such as the Welsh Harp and Fryent Country Park**

### CREATING A HEALTHY BOROUGH

- **Using the iconic sporting heritage associated with Wembley stadium to**

**play its part in stimulating greater levels of activity**

- **Integrating physical activity back into the everyday lives of residents through promoting safe environments, active travel and improving access to open spaces, sports and leisure facilities.**
- **Improving physical and mental well-being for borough residents by adopting a health-integrated planning approach**
- **Reducing health inequalities through focusing on narrowing the gap between the most affluent and the most deprived areas of the borough**

### GROWING A GOOD ECONOMY

- **Make better use of Brent's employment land through its intensification and also where possible support additional housing/ community facilities through co-location**
- **Support Brent's priority high streets in adapting to the changing way people shop, lifestyles and the challenges posed by other large centres in London**
- **Promote and support a strong and diverse night-time economy in Kilburn to contribute to London's role as a 24-hour city**

### INCREASING EFFICIENCY AND RESILIENCE

- **Reduce carbon emissions by supporting the continued expansion of local and renewable energy systems such as those at Wembley Park and South Kilburn into other Growth Areas**
- **Tackle congestion and air quality around the North Circular, improving orbital public transport routes such as the West London Orbital railway scheme to provide realistic alternatives to travelling by car**
- **Reduce the risk of flooding from the River Brent and its tributaries and other sources by putting the right development in the right places and reducing surface water run-off and potable water use**
- **Provide a safe and inclusive environment around Wembley Stadium and Wembley Arena to support their iconic status for positive memories to be made**
- **Continue to support Brent's award winning street tree planting initiatives and greening of the built environment to combat air pollution, flooding, overheating and threats to ecological habitats**

## DELIVERING THE HOMES TO MEET BRENT'S NEEDS

- **Housing delivery will be maximised, with sufficient planning permissions to support delivery of on average 1868 homes a year in the period to 2041 to meet principally Brent's housing needs but also those of wider London;**
- **Providing new homes in truly mixed, inclusive communities across a range of tenures, maximising the provision of affordable homes with a particular emphasis on social rented properties, but also more affordable home ownership and improved opportunities for higher quality market rented properties;**
- **Providing new family housing with at least 25% of new homes being 3 bedrooms or more, recognising that Brent's suburban context provides opportunities for houses as well as flats;**
- **Meeting the growing need for specialist housing such as the 230 homes for older people per year to accommodate Brent's aging population and others with challenges who may require additional support.**

The following policy proposes to take forward the existing policy in the Brent Local Plan.

## POLICY DMP1 DEVELOPMENT MANAGEMENT GENERAL POLICY

**Subject to other policies within the development plan, development will be acceptable provided it is:**

- **of a location, use, concentration, siting, layout, scale, type, density, materials, detailing and design that provides high levels of internal and external amenity and complements the locality;**
- **satisfactory in terms of means of access for all, parking, manoeuvring, servicing and does not have an adverse impact on the movement network;**
- **provided with the necessary physical and social infrastructure;**
- **conserving or enhancing the significance of heritage assets and their settings;**
- **and maintaining or enhancing sites of ecological importance;**
- **safe, secure and reduces the potential for crime;**
- **not unacceptably increasing exposure to flood risk, noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality;**

- **retaining existing blue and green infrastructure including water ways, open space, high amenity trees and landscape features or providing appropriate additions or enhancements; and**
- **resulting in no loss of community facilities or other land/buildings for which there is an identified need.**

## ALTERNATIVE POLICY CONSIDERED

- 4.1.2 No policy.** This is not appropriate as it reduces the ability of non-planning professionals to get an overview of what are the matters that are likely to be required to be considered/ satisfactorily addressed as part of the planning application process.

## JUSTIFICATION

- 4.1.3** The Council has a positive attitude towards development and the potential benefits that it can provide to residents, businesses and visitors. Brent seeks to support the presumption in favour of sustainable development within the NPPF through Development Plan documents and the London Plan. To reduce the potential for repetition of policies within the Brent Local Plan a general Development Management Policy is included. This also gives a broad overview of issues that developments should address and seek to satisfactorily resolve prior to a planning application being submitted and subsequently being approved.

- 4.1.4** In considering the appropriateness of developments a number of factors as outlined in the policy may be applicable, whilst for some, relatively few will apply. A number of the criteria are inter-related. For each criterion there is also likely to be more specific policy considerations in the NPPF and associated Planning Practice Guidance, the London Plan and the Brent Local Plan and associated Supplementary Planning Documents.

- 4.1.5** Where approved, the impact of the majority of developments is likely to be controlled through approving a set of plans, along with a limited number of associated conditions. For larger scale developments the number of conditions is likely to be larger with potential additional information needing to be supplied prior to commencement or occupation of the development. In a small number of cases legal agreements between the developer and the Council (and others) might be required to ensure that certain actions or payments are undertaken to make a development acceptable. The Council

aims to ensure that development complies with appropriate national and local planning policy and guidance through effective enforcement action. Enforcement action will be considered against unauthorised development and will be guided by national guidance and the priorities set out in the Brent Enforcement Plan which includes a test of expediency.

- 4.1.6** Some uses have specific policy that prioritises their direction towards certain locations, e.g. main town centre uses within town centres; others in principle might be appropriate in a wider variety of locations, e.g. residential. Whilst an individual development of a particular use might be acceptable, a concentration of the same or similar uses might not be, for example if giving rise to potential increases in antisocial behaviour, or exacerbating an adverse environmental issue.
- 4.1.7** In relation to the siting, layout, scale, type, density, materials, detailing and design of a development, the surroundings of the site will be an important consideration and in particular, the quality of the development and how it would relate to existing buildings and spaces together with its impact on neighbouring occupiers. In areas with a set of consistent characteristics that create a sense of place this does not necessarily mean a slavish reproduction of existing styles or architecture. Modern interpretations based on a demonstrable appreciation of local context can add variety and interest to complement rather than detract from the attributes of recognised high quality areas. For those in the development and neighbours it is important that the development creates a high quality environment, addressing issues like spaces between buildings, privacy, outlook, daylighting, shadowing, micro-climates and amenity space.
- 4.1.8** The accessibility of a development is a fundamental component of its success. From an equalities perspective development should be as accessible as possible to individuals whatever their characteristics. In addition movements by walking, cycling and public transport should be maximised and functioning of existing movement networks not undermined. Parking, accessibility and servicing of new buildings need to be fit for purpose in terms of amount and layout.
- 4.1.9** Development will be expected to provide any associated infrastructure required to make it acceptable from a planning perspective. This includes elements such as on or offsite physical infrastructure for example transport improvements, water and sewerage infrastructure, surface water drainage or social infrastructure such as additional capacity in schools or health practices.



- 4.1.10** Heritage assets include a wide variety of statutorily designated and non-designated features. Some are protected by law and cannot be materially altered without consent, e.g. listed buildings and scheduled monuments. This statutory protection together with national planning policy also places a legal duty on the Council to seek to preserve or enhance the significance of such assets and their settings. As such, developments affecting a heritage asset will be required to show that it seeks to preserve or enhance its significance and its setting. Extensive archaeological priority areas of Brent are identified and similarly in such areas developments should seek to identify potential assets and avoid their harm.
- 4.1.11** Similarly with ecological sites, some have statutory designations, e.g. Sites of Special Scientific Interest whilst for ecology in general other legislation statutorily protects flora and fauna such as bats and nesting birds. The emphasis is on protecting and ideally enhancing these types of features.
- 4.1.12** Developments should be safe and not expose users or those in neighbouring areas to an unacceptable risk of danger. In seeking to limit the potential for crime the preference is through good design related to factors such as the layout, use, building orientation and materials, passive surveillance, active frontages as well as security deterrents such as locks, fences, alarms and CCTV.
- 4.1.13** Developments should ensure that they do not create unacceptable exposure to adverse environmental factors to users/ occupiers and those in surrounding areas. National policy seeks to steer development away from areas of flood risk (from rivers and others sources), unless exceptions can be justified. Developments should also control water output to ensure flood risk to other areas is not unacceptably increased. Similarly, this approach applies to a range of other potential environmental factors which will have to be controlled by, for example, location away from receptors, or physical measures to bring potential impacts to acceptable levels. In the case of a takeaway introduced into a shopping parade with residential properties above, this could require filters and positioning of extraction fans/flues to reduce the impact of noise, smells and diminished air quality, whilst limits on opening hours might be required to regulate general disturbance from patrons at night.
- 4.1.14** Environmental assets such as blue and green infrastructure enhance the appearance, quality and bio-diversity of Brent, provide a recreational resource, improve air quality and reduce the potential impacts of climate change. As such wherever possible and in particular where they are of high quality they should be retained. In addition to this developments are encouraged to take every opportunity to provide additional features or where adjacent provide extensions to or enhance the setting of such features.
- 4.1.15** Brent's predicted increase in population size, along with its continuing trend for increased diversity will put pressure on the capacity of supporting community facilities. This allied to the need to provide new homes and employment opportunities means that community facilities which have a low value may be under-pressure for redevelopment for higher value uses. Communities have the potential to identify Assets of Community Value. In addition to this in Brent, emphasis will be placed on ensuring that such community facilities are not lost where they meet or could meet a potential need.
- 4.1.16** A greater level of detail of planned change that can be spatially specific is set out within the seven Places in the next chapter. Please note that within these chapters all the development capacities in Growth Areas and site allocations are indicative. Most are a high level assessment based on an understanding of the opportunities and constraints and use of typical densities. Planning permissions on sites may subsequently vary capacity up or down due to the more detailed analysis that is undertaken at that stage.

# 5.1 CENTRAL



## CENTRAL

**5.1.1** The Central place includes parts of Barnhill, Preston and Tokyngton, wards. Its town centres are Wembley Park and part of Wembley. The Chiltern line runs along the southern boundary passing through Wembley Stadium station. Barn Hill conservation area forms the northern boundary whilst the Chalkhill estate and Wembley Stadium Industrial Estate lie to the east.



**FIGURE 7 MAP OF CENTRAL PLACE**



## CHARACTER AND CULTURE

- 5.1.2** The Jubilee/ Metropolitan line bisects this place and both sides has very different characters. The north is predominantly metroland suburban residential comprising the 1920s/1930s detached and semi-detached houses of Barn Hill conservation area and the later Chalkhill estate. The south has some element of typical metroland character to the west of Empire Way, but to its east is very different. Historically it was predominantly industrial land around the Wembley stadium following the closure of the Empire Exhibition in 1925. A significant part of the area has more recently been undergoing a transformational change following completion of redevelopment of the national stadium in 2007. This has resulted in a new Wembley Park development, a high density mixed use neighbourhood of contemporary designed tall buildings predominantly of new homes, but also hotels, student accommodation, offices and retail/ leisure. The remainder of the place further to the east is low grade industrial land and buildings
- 5.1.3** There are currently no significant open spaces within the Central area however Barn Hill open space lies just to the north. A new three hectare public park will be delivered as part of the Wembley Park development.
- 5.1.4** There are several notable heritage assets including the conservation areas of Barn Hill and Wembley High Street and listed buildings such as the SSE Arena and the Lycée International de Londres Winston Churchill (the former Town Hall). The national stadium is an iconic structure of national and international cultural significance in relation to football.

## TRANSPORT

- 5.1.5** This area is well connected to the rest of Brent, central London and South Buckinghamshire by both the Jubilee and Metropolitan lines and Chiltern line. It has become a convenient location for commuters and students travelling into central London. The Jubilee Line is now part of the night tube network, providing an opportunity for the night-time economy to grow here. There are significant congestion issues for road traffic on event days at the national stadium or SSE Arena. A potential road connection at Bridge Road/North End Road will help address recognised vehicle circulation problems for local residents during events.
- 5.1.6** This area generally has a high Public Transport Accessibility Level (PTAL), particularly around Wembley Park Station and along Wembley Park Drive towards Wembley town centre. It is one of the best connected places in the borough and

has potential for significant tourism and evening economy uses in conjunction with the stadium, arena, London Designer Outlet (LDO) and Boxpark.

## TOWN CENTRES

- 5.1.7** This area's town centre offer is divided between a selection of smaller, independent shops along Wembley Park Drive and specialist discount offer from larger high street stores/ mainstream designers in the LDO. Wembley Park Drive is home to a diverse selection of inexpensive restaurants, pubs and cafes, supported in large parts by visitors. Its offer also caters for the local population. The LDO forms a hub within the new Wembley Park development and aside from its substantial retail offer provides a wide range of mainstream high street food and drink outlets as well as a cinema.
- 5.1.8** Wembley Park Drive encompasses a number of service uses such as a launderette, pharmacy and estate agents. It includes the highest proportion of night-time economy uses of all town centres in Brent. From a less positive perspective it has one of the highest proportions of betting shops. Overall, however the town centre is considered to be one of the borough's best performing. Only two per cent of retail units are vacant, significantly below the borough average and that of London as a whole.
- 5.1.9** Despite relatively high occupancy rates, average rental values are slightly below the borough average. It is likely that as population density increases and the new Wembley Park neighbourhood is built this will rise.
- 5.1.10** Wembley Park town centre currently has two distinct shopping areas either side of the underground station. It also has two 'out of town' retail developments set behind extensive surface car parking; an ASDA superstore and Stadium Retail Park.

## EMPLOYMENT AND EDUCATION

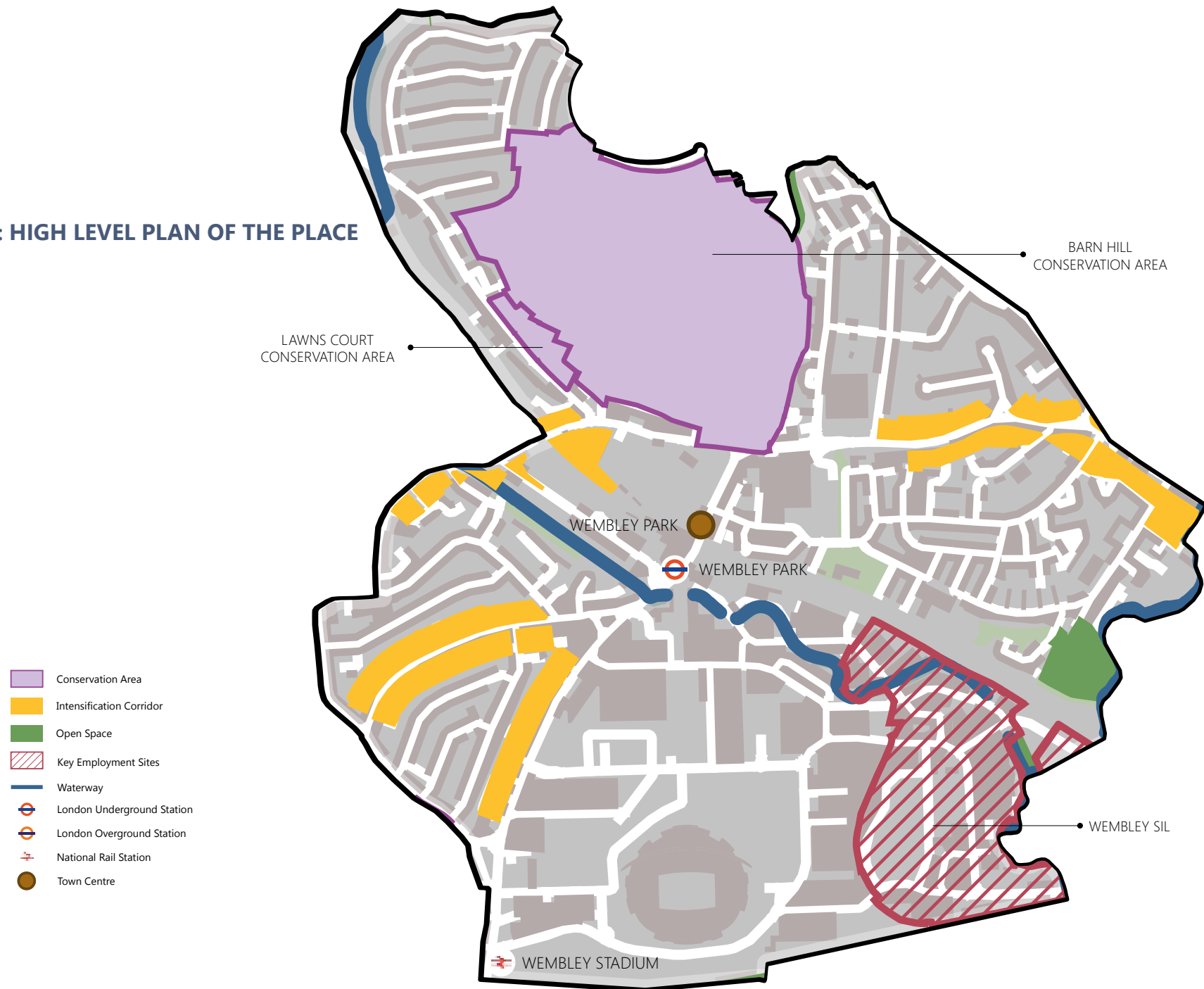
- 5.1.11** The Central place is a strategic retail, office and public sector hub. Wembley Park has one of the highest concentrations of employees in the borough. Wembley industrial estate forming the eastern boundary of this area is designated as Strategic Industrial Location. The largest employment sector is public administration, education and health, accounting for a quarter of employment. Significant employers include Brent Council in the Civic Centre, the College of North West London, University College of Football Business (UCFB), the Football Association and Network Homes. It also has a much

higher concentration of activity in motor trades, higher tech manufacturing and warehousing and logistics than across London.

**5.1.12** Significant new office and commercial space is planned as part of the new Wembley Park development. This will consolidate the area’s position as an employment hub. This will more than off-set the significant loss of office space in particular that has and will occur as a result of permitted development to residential uses. The area’s high levels of public transport connectivity make it a prime employment location and significant new affordable workspace provision will allow start-ups to develop. In addition due to its increasing success the UCFB will be developing a new purpose built campus. The College of North West London is also looking to centre its activities on Wembley Park by consolidating numerous campuses into a single new facility.

CHALLENGES	OPPORTUNITIES
<ul style="list-style-type: none"> <li>• East-west travel during events faces significant delay</li> <li>• There is currently no significant open space in the Central area</li> <li>• Industrial sites in this area are generally underutilised and in poor condition</li> <li>• There is a high percentage of betting shops on the high street</li> <li>• How to successfully merge dense, tall development around the stadium with existing Wembley Park neighbourhood</li> <li>• There are limited community facilities in the town centre, likely to be exacerbated by significant future population increase</li> <li>• Loss of industrial and employment land for residential use</li> <li>• Greater use of the national stadium particularly as a result of commercial potential identified through its potential sale</li> <li>• Limited dwell time by many who attend major events at the national stadium and SSE Arena</li> </ul>	<ul style="list-style-type: none"> <li>• Continue the new Wembley Park development to create a new neighbourhood for Brent including a significant public open space</li> <li>• High PTAL levels could reduce car dependence and allow car-free developments/reduced car parking standards and attract more commercial occupiers/interest</li> <li>• The area is well served by public transport and could benefit from additional cycle routes</li> <li>• Mixed-use redevelopment of employment sites between the stadium and Wembley Stadium Industrial Estate to create transition between new residential development and existing SIL</li> <li>• Wembley Park town centre has relatively low vacancy rate and high employment level</li> <li>• Potential to improve the link between the two parts of the Wembley Park town centre and change ‘out of town’ retail format to complement the offer.</li> <li>• Good potential for evening/night-time economy influenced by events at the stadium and arena</li> <li>• Removal of pedway and other public realm improvements along Olympic Way together with potential for better offer in the area overall to retain spend/ create a sense of place which encourages more visitors</li> <li>• New development and public space can strengthen the link between Wembley Park and Wembley town centres and the offer</li> <li>• Increased tree planting along key pedestrian routes will improve the quality of public space and improve air quality</li> <li>• Greater use of the national stadium, with a demographic encouraging longer dwell time/more local spending</li> </ul>

FIGURE 8: HIGH LEVEL PLAN OF THE PLACE



## VISION

- 5.1.13** Wembley Park as part of the wider Wembley Growth Area is set to drive the regeneration of central Brent. It will continue its transformational change to becoming a high quality, high density, highly connected and sustainable city quarter generating thousands of new homes as well as jobs across a range of sectors including retail, offices, Brent Civic Centre, conference facilities, hotels, sports, leisure, tourism and visitor attractors, creative and cultural industries and education facilities reflecting its designation as an Opportunity Area and Strategic Cultural Area for London.
- 5.1.14** The heart of Wembley will be a series of distinctive mixed-use places connected by a strong pedestrianised commercial spine between Wembley Park and Wembley Stadium stations. Off this will be residential streets, spaces and squares and a major new public park along Engineers' Way. A variety of uses will be introduced to the east of the national stadium to provide a transition from the residential and commercial space around the London Designer Outlet through to the Strategic Industrial Locations further east. The wider Strategic Industrial Location will be protected and where possible intensified, whilst its longer term future, particularly its western edge as an employment led extension of the high density mixed use Wembley Park typology post 2041, will be considered in more detail for development post 2029.
- 5.1.15** New development will build on the cultural heritage of the national stadium and the SSE Arena while the historic Barn Hill neighbourhood will be protected to preserve its identity, creating a place where the new and existing parts of Wembley interface with one another. Wembley national stadium's use as a venue for the final of Euro 2020 and Brent's status as London Borough of Culture 2020 with its associated legacy opportunities will be an integral part of improving the place for the future.

## PREFERRED POLICY OPTION BP1 CENTRAL

Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:

## CHARACTER, HERITAGE AND DESIGN

- a. **Tall buildings are appropriate within the Wembley masterplan area, taking care to preserve protected views of the stadium and create a high**

**quality new neighbourhood and integrating well with the suburban character of the surrounding area**

- b. **Conserving and enhancing heritage and cultural assets including Barn Hill conservation area, the SSE Arena and the national stadium**
- c. **Enhancing the public realm and stadium approach from Wembley Park and Wembley Stadium Stations whilst creating stronger links between Wembley Park and Wembley town centres**

## HOMES

- d. **Continued residential-led mixed-use development within the Wembley Growth Area where this place will deliver a total of over 14,000 new homes**
- e. **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**

## TOWN CENTRES

- f. **To ensure that the development around the national stadium is compatible and coordinated with regeneration proposals in the surrounding area, and that Wembley town centre, the main focus for new retail and town centre uses in the borough, is expanded eastwards into the stadium area**
- g. **Planning for the development of 6,700sqm comparison goods floorspace by 2028, and 6,100sqm of convenience goods floorspace directed towards Wembley and Wembley Park to support future designation of the joined town centres to be recognised as a metropolitan centre at the London Plan level**
- h. **Providing at least one foodstore of between 1,000 and 2,000sqm**
- i. **Diversifying the town centre offer to include more cultural and leisure facilities**

## EMPLOYMENT AND SKILLS

- j. **Encouraging the intensification of existing Strategic Industrial Locations closer to the North Circular Road**
- k. **Introducing a greater proportion of non-residential floorspace in mixed-use development on land previously allocated for development on Watkin Road and First Way to the east of the stadium**

- I. Increasing the supply of modern affordable workplace developments for the arts and creative industries**

## COMMUNITY AND CULTURAL FACILITIES

- m. Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities and cultural through replacement of Fountain Studios**
- n. Providing a new primary school on the York House car park site**

## OPEN SPACE AND BIODIVERSITY

- o. Supporting the re-naturalisation of the River Brent and Wealdstone Brook and its setting with increased amenity access where possible**
- p. Creating a new seven acre public park plus other pocket parks/ quality areas of public realm, as part of the Wembley Park redevelopment scheme to serve new and existing communities**

## TRANSPORT

- q. Reducing event day congestion/ local resident inconvenience by creating a road link between North End Road and Bridge Road**
- r. Removing the one-way system to the east of the national stadium**
- s. Ensuring that the transportation infrastructure of Wembley is upgraded so that it supports the needs of the local community**
- t. Promoting access by public transport, bicycle or on foot and encouraging car free/lower parking provision**
- u. Consolidating the pedestrian Wembley Park/Wembley Stadium station route along Wembley Park Boulevard/Olympic Way**

## JUSTIFICATION

### CHARACTER, HERITAGE AND DESIGN

- 5.1.16** While much of this area has a strong suburban character dominated by two storey detached and semi-detached homes built during the early 20<sup>th</sup> century, the building of the national stadium provided a context for the provision of a concentration of tall buildings. As a recognised transformational area, additional tall buildings are appropriate in the



Wembley Growth Area. The taller elements within the area will be consistent with the parameters set out in the Wembley masterplan associated with the outline planning permission 15/5550 for the remainder of Wembley Park.

- 5.1.17** Outside the Wembley Growth Area, there will be opportunity for some additional tall buildings, but of a much smaller scale (potentially up to 15-18 metres or 5-6 storeys) along intensification corridors. These are main roads such as Blackbird Hill, Forty Lane, Forty Avenue and Wembley Park Drive. Outside of these areas building heights will be more reflective of the existing predominantly two storey local context. Further guidance on the location and scale of tall buildings in Brent is set out in the Brent Tall Building Strategy.

## HOMES

- 5.1.18** Wembley has seen significant investment, especially around the stadium where the developer Quintain is the main landowner and are taking forward the Wembley masterplan. Development has been at greater densities than envisaged in the 2010 Core Strategy. This, plus the identification of additional sites will increase the place's potential capacity to a minimum additional 14,400 homes by 2041.
- 5.1.19** Land along First Way and Watkin Road has previously been allocated for non-industrial development. These sites still provide that opportunity, but at higher densities than previously identified in the 2010 Core Strategy.
- 5.1.20** Outside the Wembley masterplan area there are a number of key sites which could contribute to Brent's housing need. Land either side of Brook Avenue is underutilised and recent development has established a denser character at both ends of the street. It is expected that Wembley Station car park is redeveloped to provide a significant number of new homes in line with London Plan guidance on station intensification. In addition the residential units to the south of the road could be replaced with taller buildings to make better use of the land, reduce flood risk and provide an improved setting for Wealdstone Brook.
- 5.1.21** ASDA, together with the Kwik Fit/ The Torch site has potential to be redeveloped to provide a significant number of dwellings whilst retaining the store to provide a significant amount of housing. This is due to size, excellent public transport links and proximity to local shops and services.

## TOWN CENTRES

- 5.1.22** Convenience retailing floorspace should be directed to Wembley and Wembley Park to alleviate the over-trading of existing foodstores currently taking place in the area. The redevelopment of Stadium Retail Park provides the opportunity to re-provide and expand retail floorspace to address identified needs.
- 5.1.23** The continued expansion of retail/leisure uses particularly in active frontages at ground floor along Wembley Park Boulevard and Olympic Way will provide greater continuity between Wembley and Wembley Park town centres. This will eventually effectively result in a single continuous town centre, with a significant part being in a high quality pedestrianised environment. This connection, plus the addition of floorspace capacity and mix of uses will give the potential for the new single town centre to be of such significance that it is recognised a metropolitan centre in future London Plans.
- 5.1.24** The Central area will be suitable for promotion of the evening and night-time economy due to its excellent public transport links and tourism potential. The restaurants and leisure facilities in the London Designer Outlet, Wembley Park Boulevard/ Olympic Way and Wembley Park town centre will act as a draw to create an eating and drinking destination. Development of further uses which support these functions should be supported, but care should be taken to ensure that the centre's ability to meet day-to-day shopping needs is not reduced.

## EMPLOYMENT AND SKILLS

- 5.1.25** The London Industrial Land Demand Study identified Brent as needing to increase capacity across its Strategic Industrial Locations (SIL). The SIL east of Wembley Stadium forms part of a larger industrial site which should be protected to prevent further loss or undermining of the employment land hierarchy. Land at First Way and Watkin Road previously allocated due to its increased potential for high density development, provides greater scope to address Brent's status as a provide capacity borough in the London Plan by incorporating ground floor employment uses.
- 5.1.26** The close proximity to the North Circular Road provides one of the best opportunities in Brent for the London Plan's industrial intensification policy to be delivered. Towards the east, SIL in the area bounded by development that will occur along First Way/ Watkin Road area, London Plan SIL policy will be implemented. If however there has not been any tangible progress on delivery of intensification by 2029 (either on the ground or via credible

developer interest and it is not deliverable due to viability) this area will be actively considered in an update of this Local Plan for co-location/intensification as an extension to the high density mixed use environment of Wembley Park.

- 5.1.27** Historically, Wembley has been an area that has a concentration of office development. Much of this has been lost more recently or is about to be lost to residential development. Nevertheless, its connectivity, high central London rents and the development of place-making associated with Wembley Park provides an opportunity for greater market stimulus. The Wembley Park development has the potential to provide more office space through the implementation of planning permissions granted. Opportunities to provide more office in and around the town centres will be viewed positively. Where permitted development rights for office change of use lapse in areas covered by the Article 4 direction, retention of the office space and its enhancement will be sought.
- 5.1.28** New small scale affordable workspace has been provided at ground floor level in the more recent Wembley Park developments. Further opportunities will be sought as part of mixed use developments to provide additional space.

## COMMUNITY AND CULTURAL FACILITIES

- 5.1.29** Due to high levels of population growth due to new development there will be a need for new community and cultural facilities. A new primary school on the site of York House car park and community space has planning permission and new community space will be provided at ground floor level in the residential blocks. The redevelopment of the Fountain Studios, plus the provision of Boxpark provides the opportunity to further consolidate the cultural offer of the area in the longer term as part of the place making strategy.
- 5.1.30** The support of the night time economy at Wembley Park will support the cultural offer of the area. The addition of affordable workspace has resulted occupation by artists and makers. The provision of additional space can extend this trend and provide a greater critical mass to make it more of a recognised concentration.
- 5.1.31** Whilst currently not proceeding, the potential sale of the national stadium could provide both opportunities and threats. Whatever the future outcome in terms of an alternative owner to the FA, the process has indicated the commercial potential of the stadium and this is now more likely to be

pursued. The Heritage and Culture section of the Local Plan has a specific policy on the stadium to positively address any potential changes.

## OPEN SPACE AND BIODIVERSITY

- 5.1.32** The Central area does not currently contain any significant open space. The creation of a new three hectare park and other pocket parks as part of the Wembley Park development will alleviate the pressure on open spaces outside the Central area and remove the need to travel to use open space.
- 5.1.33** Within large new developments open space should be provided in line with London Plan and Brent borough standards, offering a mix of green space and community meeting space. Existing small open spaces should be protected and enhanced given the lack of public space currently available in the Central area.

## TRANSPORT

- 5.1.34** The high levels of population growth planned in this area will place additional pressure on the existing road network, particularly on event days. After the removal of the pedway access to the stadium, east-west road traffic will be closed off on all three existing routes through Wembley Park. The creation of a new road connection via North End Road would allow local traffic to pass through on event days. The prioritisation of development close to public transport will reduce pressures on the road network, but require localised improvement measures to support additional capacity.

## KEY SITE ALLOCATIONS

Wembley Park Station, Watkin Road, Fifth Way/Euro Car Parts, Stadium Retail Park and Fountain Studios

## OTHER POLICY GUIDANCE

- Approved Masterplan for Wembley Park related to Planning Permission 15/5550


### BCSA1: ASDA/THE TORCH/KWIKFIT

<p>Site Plan</p>	
<p>Existing Use</p>	<p>Supermarket with associated car parking and filling station, public house and Kwik Fit car servicing</p>
<p>Allocated Use</p>	<p>Residential-led mixed-use</p>
<p>Indicative Capacity</p>	<p>470</p>



Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	68	67	335
Address	Forty Lane, Wembley, HA9 9EX		
Area	2.79ha (ASDA) and 0.38ha (The Torch/ Kwik Fit)		
Description of Existing Site	Site currently comprises an Kwik Fit, Public House and ASDA supermarket with associated carpark and four-pump petrol station. These are for the most part single storey buildings with large areas of car parking. The site is located approximately 200m northeast of Wembley Park Station and is bordered by the A4088 Forty Lane to the north, commercial properties to the south west and a retail parade and by residential development to the south and east.		
Ownership	Private		
Planning History	No relevant planning history.		
PTAL Rating	5-6a (2031 estimate)		
Planning Considerations	<p>The site forms part of Wembley Park Town Centre and sits within the wider Wembley Growth Area, making it suitable for residential development. The site is not within a Conservation Area or Archaeological Priority Area, however it is immediately adjacent to the Barn Hill Conservation Area and the Grade II Listed Lycee International De Londres (former Brent Town Hall).</p> <p>There are two vehicular access points to the ASDA site from the A4088 and opportunities to create further access points via Wellspring Crescent. The site is well served by public transport with tube and bus links located approximately 200m southwest of the site at Wembley Park Station, potentially allowing the site to be partly or wholly car free development.</p> <p>Given presence of filling station on ASDA site and current use on Kwik Fit site, there is a risk of contamination. Where development does come forward a Preliminary Risk Assessment will be required and, if necessary, remediation.</p> <p>Consistent Local Plan policy a replacement public house will be required.</p>		
Risks	Site is currently occupied by supermarket which is trading well and Kwik Fit meeting their operation needs which may affect willingness of the owners to develop.		
Design Principles	<p>To provide a vertically mixed use development incorporating ground floor retail/ leisure/commercial uses that maximises the potential of the site. An active frontage along Bridge Road, Forty Lane, Wellspring Crescent and Chalkhill Road. Ideally the ASDA store entrance will be closer to Forty Lane and any servicing arrangements not creating a break in the connection with the rest of the town centre. The potential for smaller scale ground floor retail/commercial to create a positive frontage that adds to the retail offer and vitality and viability of the town centre should be considered if the supermarket cannot the active frontage.</p> <p>To remove the obvious levels differences along the southern and south eastern boundaries for at least one building width by providing at street level building frontage.</p> <p>Adjacent development of nine and seven storeys indicate the potential for taller buildings than the traditional suburban context, that will need to take account of the setting of the opposite Grade 2 Listed former Town Hall and not adversely impact on protected views of the stadium.</p> <p>Retain or provide for sufficient space along the frontages to accommodate large broad leaf trees such as the London Planes that currently exist.</p>		
Infrastructure Requirements	No specific wider infrastructure requirements currently identified for incorporation on this site.		
Justification	Site is located in an area of high public transport accessibility and large scale ongoing regeneration. Redevelopment for mixed use retail/ residential development would create a more efficient use of land. The site benefits from accessible green space at the nearby Chalkhill Park and has good access to local shops and services within Wembley Park town centre.		

## BCSA2: STADIUM RETAIL PARK and FOUNTAIN STUDIOS

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Large retail units and the former Fountain TV studio complex</p>		
<p>Allocated Use</p>	<p>Residential-led mixed-use development</p>		
<p>Indicative Capacity</p>	<p>680+ homes + mix of commercial/ educational uses/ student accommodation</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
		<p>340</p>	<p>340</p>
<p>Address</p>	<p>Stadium Retail Park, Wembley Park Drive, HA9 8TS</p>		
<p>Area</p>	<p>1.67ha</p>		
<p>Description of Existing Site</p>	<p>The site is currently home to large retail units, a branch of McDonalds and the former Fountain Studios building, and has gained outline planning permission for a redevelopment known as the Fulton Quarter. The site is just south of Wembley Park Station and is bordered by Olympic Way to the East, Wembley Park Drive to the west and Fulton Road to the south. The Wembley campus of the College of North West London sits immediately north of the site.</p>		

Ownership	Private
Planning History	Outline application 17/3059. Proposed development within a series of buildings, ranging from 8 to 25 storeys in height, to provide minimum 680 new dwellings and retail space as well as a mixture of the a potential range of retail, leisure, office, D1 use, office space, student accommodation and conventional residential accommodation.
PTAL Rating	Current and 2031 forecast 5-6a
Planning Considerations	<p>The site forms part of Wembley Park Town Centre and sits within the wider Wembley Growth Area, making it suitable for all main town centre uses, plus residential/ student accommodation (subject to policy limiting total student accommodation in the Growth Area). The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>The existing retail, although out of town in format contributes towards capacity within a town centre. As such given the limited opportunities to find new large scale sites to accommodation identified retail needs any development must replace existing floorspace. The opportunity to accommodate convenience retail in particular needs to be considered. The Fountain Studios is a cultural facility, which in the context of a desire to build on the Brent's London Borough of Culture 2020 status requires replacement with a similar sized facility. This has the opportunity to complement the area's night time economy/ recognised cultural status in the London Plan.</p> <p>The principle of tall buildings is acceptable on this site, subject to their height not adversely affecting protected views of the stadium. The frontage along Wembley Park Drive will require a reduction in scale to heights shown elsewhere by new development along Empire Way.</p> <p>The site is in flood zones 1 and 2. All proposed development will require a detailed Flood Risk Assessment (FRA).</p> <p>The site should take into account the College of North West London site to the north which is also an allocation. Ideally the two sites should be planned as one, to increase the potentially efficiency of land use and optimum place making. At the very least development should not compromise the ability of that site to be developed in an efficient manner.</p> <p>Meanwhile uses will be encouraged on site until construction begins.</p>
Risks	No significant long term risks identified, leaseholders who operate on the site might be reluctant to end their occupation early. The site is owned by Quintain who are keen to develop to support the wider Wembley Park development.
Design Principles	<p>Building height and massing should build upon the established rhythm in this part of the Wembley Park regeneration scheme. It should correspond to the neighbouring buildings and step down in scale towards the west of the site. Density should reflect the site's high PTAL.</p> <p>Active frontages should be provided at ground floor level, particularly along Wembley Park Drive, Olympic Way and Fulton Road. The site should retain an element of permeability to support pedestrian movement from Olympic Way to Wembley Park Drive.</p> <p>Due to the site's location in Flood Zone 2, the 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, student accommodation, hotels, and certain community uses towards areas of lowest risk within the site; north west area and southern edge. Density should be varied to reduce the number of vulnerable units in high risk areas.</p>
Infrastructure Requirements	Significant social infrastructure is being provided nearby as part of the Wembley masterplan, therefore no specific infrastructure apart from that usually required on large residential sites at this stage.
Justification	The site offers substantial development potential as an integral part of the wider Wembley development area. The Wembley masterplan suggests that there are a number of mixed use options where creative office and other accommodation can be combined with educational and commercial accommodation at lower levels with residential development in upper storeys. Proposals should maximise opportunities for development that would benefit from a town centre location with excellent public transport access and the close proximity to bus, rail and underground transport interchanges.


## BCSA3: BROOK AVENUE



Existing Use	Residential		
Allocated Use	Hotel/ other main town centres uses/ residential on the current Premier Inn site with residential on the remaining along Brook Avenue.		
Indicative Capacity	450		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	-	-	450


Address	Brook Avenue, Wembley, HA9
Area	1.78ha
Description of Existing Site	Site is a residential street characterised by a mixture of two storey detached and semi-detached houses dating from the early 20 <sup>th</sup> century. The site is bounded by Brook Avenue to the north and the Wealdstone Brook to the south. The eastern parcel of land comprises a Premier Inn and associated car parking. To the north of Brook Avenue recent development has established a higher density which should be reflected in redevelopment of this site.
Ownership	Private
Planning History	No relevant planning history
PTAL Rating	4-6a (2031 estimate)
Planning Considerations	<p>Part of the site is within the Wembley Park town centre (Premier Inn). It all sits within the wider Wembley Growth Area. The Premier Inn site has the potential to accommodate a larger hotel or a hotel and range of other maintown centre uses or residential. The remainder of the site along Brook Avenue can accommodate much higher density residential.</p> <p>The site is not within a Conservation Area or Archaeological Priority Area.</p> <p>The site is accessed via Brook Avenue by both vehicles and pedestrians and is well served by public transport, with good tube and bus links close to the site on Bridge Road. As such car free development is likely to be acceptable in this location.</p> <p>Some of the existing dwellings in Brook Avenue are within what is functional floodplain and are at risk of flooding. The redevelopment of these dwellings provides the opportunity to reduce the real risk of flooding to property by bringing development closer to Brook Avenue away from the watercourse. All development will be required to undertake a detailed Flood Risk Assessment (FRA).</p> <p>As the site sits adjacent to the brook any development must improve access to the waterway and provide an appropriate landscaped set-back which may include public open space.</p> <p>There are a number of mature trees spread across the site. Where possible these should be maintained and integrated into newly provided open space.</p>
Risks	Site is in fragmented private ownership which is a barrier to comprehensive redevelopment
Design Principles	<p>The Premier Inn site provides the opportunity to provide a more defined edge to Wembley Park Drive/ Brook Avenue and introduce an active frontage containing main town centre uses.</p> <p>The site is adjacent to a mixture of residential and commercial buildings up to ten storeys. Within this context development that is taller than the existing two storey suburban dwellings will be acceptable to the eastern side of the site, stepping down towards the residential buildings to the west of the site which is identified as an intensification corridor along Forty Avenue.</p> <p>A minimum of 8m setback from Wealdstone Brook will be sought. Development will be required to improve access to the waterway and provide an appropriate landscaped setback which may include public open space.</p> <p>The building line should be closer towards Brook Avenue.</p>
Infrastructure Requirements	No specific infrastructure requirements identified.
Justification	The site is located in an area with excellent public transport accessibility levels and could improve the public realm as a gateway to the new Wembley Park development. Given the high levels of development around this site, it would benefit from good access to local shops and services. Redevelopment of this site can contribute towards an improved setting for the Wealdstone Brook, including the delivery of open space and river restoration work to improve ecological diversity and climate change adaptation.

## BCSA4: FIFTH WAY/EURO CAR PARTS

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Retail warehouse and car park of Euro Car Parts and adjacent vehicle/ skip site for Generay</p>		
<p>Allocated Use</p>	<p>Mixed-use, residential-led development to incorporate 2500 sq.m. of business use floorspace and potentially student accommodation (subject to Growth Area limit not being exceeded).</p>		
<p>Indicative Capacity</p>	<p>Up to 700</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>200</p>	<p>500</p>	
<p>Address</p>	<p>Fifth Way, Wembley</p>		

Area	1.3ha
Description of Existing Site	The site is currently in commercial and industrial use with approximately half the site occupied by large sheds and the remainder comprising associated car parking and storage. Wealdstone Brook forms the northern border of the site, with new housing development coming forward to the south and west. Directly east of the site it becomes industrial in nature characterised by small scale low-rise sheds along Fourth Way.
Ownership	Private
Planning History	No relevant planning history
PTAL Rating	3/4 (2031 estimate)
Planning Considerations	<p>The site was allocated within the Wembley Area Action Plan for mixed-use development with capacity for 360 dwellings. The approval of the Wembley Park masterplan and subsequent increases in height and therefore density within that context means that a larger amount of development is now considered appropriate on the site. The site is appropriate for tall buildings, subject to them being lower than the adjacent approved Wembley masterplan parameters and not adversely affecting protected views of the stadium.</p> <p>Although a long term allocation, the proposed loss of existing industrial land against the changed backdrop of the borough's identification as 'provide capacity' in the London Plan mean that employment uses should now be provided as a part of any redevelopment of this site.</p> <p>Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required and, if necessary, remediation.</p> <p>Small sections of the site fall within Flood Zone 2 adjacent to Wealdstone Brook. An appropriate buffer zone along the brook will remove the developable area of the site wholly into Flood Zone 1. The brook runs along the northern boundary of the site and is designated as a Grade II Site of Interest for Nature Conservation (SINC) of Borough Importance.</p>
Risks	Site is in multiple ownership although risk is mitigated by owners' aspiration to redevelop
Design Principles	<p>The creation of an appropriate buffer between the existing industrial and new non-industrial uses will be required. Given the neighbouring heights permitted as part of the Quintain masterplan, tall buildings will be appropriate, stepping down towards the eastern edge of the site.</p> <p>Active frontage along Fifth Way and Fulton Road.</p> <p>Biodiversity improvements and flood risk adaptation measures will be sought when development proposals come forward. A buffer strip of at least 10 metres wide should be retained for a publicly accessible brook side park to allow for a cycle way/ footpath, associated landscaping, tree planting and street furniture as agreed in consultation with the Environment Agency and Brent Council.</p> <p>Removal of part of the canalised wall and regrading of the bank to provide a more natural setting will be sought. The site would be suitable for housing facing the river providing the restoration work is carried out.</p> <p>Land may be required for road infrastructure improvements along Fifth Way. Further transport analysis will provide clarity on this.</p>
Infrastructure Requirements	No specific infrastructure requirements identified at this stage. Further masterplanning work will provide additional clarity.
Justification	This large site is heavily underutilised and would be of much greater benefit as a mixed-use residential led development. The forthcoming development immediately west of this site will comprise several tall residential towers and this site offers the opportunity to transition between the wider Wembley development and the industrial land to the east. Development on this site can contribute to an improved setting for Wealdstone Brook including the delivery of open space and river restoration work to improve ecological diversity and climate change adaptation,


## BCSA5: OLYMPIC OFFICE CENTRE

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Offices of Network Homes</p>		
<p>Allocated Use</p>	<p>Mixed use main town centre uses, education/campus or residential incorporating flexible retail uses (A1, A2, A3, A4, D1, D2) at ground floor level</p>		
<p>Indicative Capacity</p>	<p>253 residential units plus 1,051sqm of flexible retail uses</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>253</p>	<p>-</p>	<p>-</p>
<p>Address</p>	<p>Olympic Office Centre, 8 Fulton Road, Wembley, HA9 0NU</p>		
<p>Area</p>	<p>0.44ha</p>		
<p>Description of Existing Site</p>	<p>The site is located between Olympic Way and Rutherford Way and is currently occupied by an eight storey office building along with associated car parking and soft landscaping.</p>		




Ownership	Private
Planning History	Permission granted (17/5097) Redevelopment of the Olympic Office Site and erection of a part-21 and part-15 storey building comprising 253 residential units and 1051sqm of flexible retail uses (A1, A2, A3, D1, D2)
PTAL Rating	Currently 5, 2031 forecast 5-6a
Planning Considerations	<p>The site falls within Wembley town centre boundary and forms part of the wider Wembley Growth Area. The site is suitable for a tall building consistent with planning permission 17/5097, and does not fall within a Conservation Area or Archaeological Priority Area.</p> <p>Although it has planning permission for principally a residential development, its town centre location makes it appropriate for a range of town centre uses as well as for any potential CNWL/further/higher education campus.</p> <p>Public Transport Accessibility Levels are very high for this site, and so parking spaces should be minimal.</p>
Risks	No significant risks identified.
Design Principles	The site is suitable for tall buildings and should be developed in line with the design principles set out in planning application 17/5097. Building height and massing should build upon the newly established rhythm along this part of Olympic Way and respond to surrounding development coming forward as part of the Wembley Park redevelopment. The ground floor/podium use should come forward towards the edge of Olympic Way to provide additional a continuation of the active frontage edge formed by the adjacent Unite and Novotel developments.
Infrastructure Requirements	No specific infrastructure requirements identified. Significant social infrastructure is being delivered nearby as part of the Quintain masterplan.
Justification	The site is located in an area with excellent public transport accessibility levels and will replace a dated office building with a modern, high quality residential-led development to contribute towards Brent's housing need.

## BCSA6: WATKIN ROAD

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Industrial, storage and ancillary office use.</p>		
<p>Allocated Use</p>	<p>Mixed-use, residential-led development to the west of the site adjacent to other schemes coming forward as part of the Wembley Park masterplan, transitioning to a more commercial-led use towards the east of the site bordering Wembley Business Centre industrial estate.</p>		
<p>Indicative Capacity</p>	<p>Assumed 1000 dwellings on basis of density of existing permissions prior to more detailed assessment, plus employment floorspace at ground floor.</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>300</p>	<p>700</p>	
<p>Address</p>	<p>Watkin Road, Wembley, HA9 0NL</p>		
<p>Area</p>	<p>1.41ha</p>		
<p>Description of Existing Site</p>	<p>The site is dominated by car repair garages, accompanied by a mix of industrial, storage and ancillary office buildings.</p>		
<p>Ownership</p>	<p>Private</p>		


<p>Planning History</p>	<p>17/2782 – approved application for the demolition of Parkwood House to provide 113sqm affordable workspace plus 283 bedroom student accommodation within a part 13 and part 17 storey building.</p> <p>18/3381 Demolition of existing buildings and redevelopment of the site to provide 219 residential units and 584.6sqm of affordable workspace (Use Class B1(a)) on ground floor, in a new building ranging between 2 and 23 storeys together with associated infrastructure works including private and communal space, car parking, cycle storage and public realm improvements – submitted.</p>
<p>PTAL Rating</p>	<p>Current and 2031 forecast – PTAL 4</p>
<p>Planning Considerations</p>	<p>The approval of the Wembley Park masterplan and subsequent increases in height and therefore density within that context means that a larger amount of development is now considered acceptable on the site than was identified in the Wembley Area Action Plan. The site is appropriate for tall buildings, subject to them being lower than the adjacent approved Wembley masterplan parameters, not adversely affecting protected views of the stadium or the residential amenity of the occupiers of North End Road.</p> <p>The site contains no designated heritage assets.</p> <p>Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required and, if necessary, remediation.</p> <p>The site falls almost entirely within Flood Zones 2 and 3. A Flood Risk Assessment will be required as part of any development coming forward.</p> <p>Wealdstone Brook runs along the northern boundary of the site and is designated as a Grade II Site of Interest for Nature Conservation (SINC) of Borough Importance.</p> <p>Although the loss of existing employment land was considered appropriate in the WAAP, Brent’s London Plan ‘provide capacity’ status for employment means that employment floorspace at least of the ground floor will now be sought as part of the redevelopment of the site. Although this Plan identifies consideration of the adjacent Wembley Business Centre in the longer term for mixed use development, in the medium term it is assumed that they will stay in industrial use. As such development in proximity to this part must adopt the ‘agent of change principle’, potentially through incorporation of more commercial uses to ensure the potential activities within the Business Centre is not compromised.</p>
<p>Risks</p>	<p>Site is in multiple ownership</p>
<p>Design Principles</p>	<p>Tall buildings will be acceptable to the west of the site taking account of schemes coming forward at Parkwood House, Apex House and Amex House, creating a tall cluster around the junction of Watkin Road and Fulton Road. Development will step down to the east end of Watkin Road.</p> <p>Proposed development must ensure it does not adversely affect the ability of other plots within the allocation to maximise their own development potential. Particular attention must be paid to the relationship between developments on the north and south sides of Watkin Road. Active frontages along Fulton and Watkin Road at ground floor level will be sought.</p> <p>Development should bring forward an improved setting for Wealdstone Brook including the delivery of open space, potential for increased access and river restoration work to improve ecological diversity and climate change adaptation.</p>
<p>Infrastructure Requirements</p>	<p>No specific infrastructure requirements identified.</p>
<p>Justification</p>	<p>The site is located in an area with good public transport accessibility levels and could improve the public realm as a transition from the new Wembley Park development to the industrial land located east of Wealdstone Brook. Given the high levels of development around this site, it would benefit from good access to local shops and services.</p>

## BCSA7: WEMBLEY PARK STATION (NORTH and SOUTH)

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Car parking and office facilities for Wembley Park Station</p>		
<p>Allocated Use</p>	<p>Mixed-use residential-led development</p>		
<p>Indicative Capacity</p>	<p>400 dwellings (300 southern site, 100 northern)</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>200</p>	<p>200</p>	
<p>Address</p>	<p>Wembley Park Station, Wembley, HA9 9AA</p>		


Area	0.7 ha
Description of Existing Site	<p>The two sites lie to the north and south of the rail line running through Wembley Park Station. The northern site comprises rail sidings associated with Wembley Park Station. The main road access to the site comes from Forty Avenue. To the north there is a nursing home and opposite the site on the other side of Forty Avenue is the Sattavis Patidar Centre.</p> <p>The southern site runs along the south side of the train tracks at Wembley Park Station and currently comprises TfL offices and car parking. Brook Avenue runs along the southern boundary of this site and provides two vehicular access points to the existing car park. The site is bounded by residential development to the south and west. To the south of Brook Avenue there is a mixture of residential blocks up to 10 storeys, two storey detached and semi-detached houses and a Premier Inn, while to the west there is a development of four residential blocks ranging from 5 to 8 storeys.</p>
Ownership	Site wholly owned by TfL
Planning History	No relevant planning history.
PTAL Rating	5/6a (2031 estimate)
Planning Considerations	<p>The site is adjacent to the boundary of Wembley Park Town Centre and sits within the wider Wembley Growth Area, making it suitable for residential or mixed-use development. The site contains no designated heritage assets however development must ensure that it does not impact on the protected view of Wembley Stadium from Barn Hill Open Space.</p> <p>Access to the northern parcel of land is constrained and so development will likely be of a lower density than that on the southern parcel. There is limited green infrastructure on site. There is a row of mature trees along the site boundary on Brook Avenue which ideally should be retained. Future development will mitigate potential noise and vibration from the nearby train tracks.</p>
Risks	Site is considered available and developable; no significant risks identified.
Design Principles	<p>The northern parcel of land will be developed at a lower density than that currently emerging to the south of the railway across the Wembley regeneration area. Building height should take reference from the surrounding three and four storey residential and commercial uses. Buildings may step up to four or five storeys however the northern site is not suitable for tall buildings of a significant scale.</p> <p>The southern site is adjacent to a mixture of residential and commercial buildings up to ten storeys. This height will be considered acceptable to the western side of the site (subject to impact on protected views of the stadium), stepping up slightly directly adjacent to the station.</p> <p>A contemporary design will be supported, and links should be established between this site and others coming forward as part of the wider Wembley Park regeneration scheme to ensure this development is successfully integrated with the surrounding schemes coming forward over the Local Plan period. Active frontages will be provided along Brook Avenue with substantial soft landscaping to create defensible space for residents. Sufficient set back from the railway lines will be required to assist in mitigating against potential adverse impacts of train movements/ engineering works.</p>
Infrastructure Requirements	No specific infrastructure requirements identified.
Justification	<p>London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, in particular through the redevelopment of sites around transport hubs and mixed-use redevelopment of car parks. Other recent developments along Brook Avenue suggest that the site can be intensified to provide a mixed-use scheme which co-locates TfL's commercial space with a significant number of new dwellings.</p> <p>The site has excellent access to public transport and local infrastructure including shops and green spaces. The Council needs to ensure continued provision of employment space so will seek its retention on this site. Other recent developments along Brook Avenue indicate that this site can be used more intensively as part of a mixed-use development to re-provide the existing TfL space alongside a significant number of new dwellings.</p>

## BCSA8: WEMBLEY RETAIL PARK

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Car parking, industrial warehouse units and meanwhile uses including office facilities and playing pitches</p>		
<p>Allocated Use</p>	<p>Mixed-use residential-led development</p>		
<p>Indicative Capacity</p>	<p>2180</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>1015</p>	<p>1165</p>	
<p>Address</p>	<p>Wembley Retail Park, Wembley, HA0</p>		

Area	5ha
Description of Existing Site	The site forms the North Eastern Lands section of the Wembley masterplan and is currently occupied by a small number of industrial warehouse units to the east and temporary office facilities and playing pitches. The majority of the site is currently covered by car parking associated with Wembley Stadium. The site boundaries are formed by Engineers Way, Fulton Road and Rutherford Way, with plots of land adjacent to this site also under construction or planned to come forward for development either as part of the Wembley masterplan or as standalone schemes.
Ownership	Private
Planning History	Forms part of application 15/5550, a hybrid planning application for the redevelopment of land around Wembley Stadium
PTAL Rating	3-5 (2031 estimate)
Planning Considerations	<p>The site is made up of plots NE01-06 of the approved Wembley masterplan as well as the northern section of the new park planned for the area. The site falls just outside Wembley Town Centre boundary however it does sit within the wider Wembley Growth Area, making it suitable for residential development. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>The site was identified as suitable for tall buildings in the Wembley Area Action Plan and will be home to the tallest building in the proposed development, signalling the northern entrance into the park.</p>
Risks	No significant risks identified.
Design Principles	Scheme should be designed in line with principles set out in planning application 15/5550.
Infrastructure Requirements	Significant infrastructure is being provided throughout the masterplan area. This site must provide the northern section of the planned new seven acre park.
Justification	The site offers substantial development potential as an integral part of the wider Wembley development area. This plot forms one of the principal development areas of the forthcoming scheme and will provide a significant amount of green space to support the surrounding development. The site's high PTAL and proximity to both Wembley and Wembley Park town centres make it suitable for dense residential development along with associated social and physical infrastructure as necessary.

## BCSA9: FIRST WAY

Site Plan			
Existing Use	Industrial		
Allocated Use	Residential-led mixed-use development, including student accommodation/ education and business.		
Indicative Capacity	1200 dwellings		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	269	450	481
Address	First Way, Wembley, HA0		




Area	4.42ha
Description of Existing Site	The site currently comprises low-rise industrial units although there is an emerging taller, residential and commercial character with the UCFB campus building approved for the old Canon industrial units and the under-construction Kelaty House adjacent to the north. The site is bounded by First Way to the west and Second Way to the east. The site was previously allocated for development in the Wembley Area Action Plan, and has come forward in part for mixed-use residential-led schemes.
Ownership	Private
Planning History	Application 17/3797 for the demolition of the existing buildings and erection of a part 7/9/10/11 storey building, comprising educational use (Use Class D1), office use (Use Class B1(a) and student accommodation (Use Class Sui Generis), with ancillary external landscaping
PTAL Rating	1a-3 (2031 estimate)
Planning Considerations	<p>The site falls outside Wembley Town Centre boundary however it does sit within the wider Wembley Growth Area, making it suitable for residential development. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>The site was identified as sensitive to tall buildings in the Wembley Area Action Plan and so should come forward at lower heights than those buildings further west towards the stadium.</p> <p>The site has a low PTAL although stands to benefit from better connections to the high levels of surrounding development and is within close walking distance to two rail stations.</p> <p>Prior to its Wembley Area Action Plan allocation, the site was formerly Strategic Industrial Land. It still contains numerous occupied business premises. Notwithstanding the acceptability of residential on site, Brent's status as a 'provide capacity' borough in the London Plan means that re-provision of business uses at ground floor level should be undertaken as part of development.</p>
Risks	Land is in multiple ownership which may prevent comprehensive redevelopment. Piecemeal development may prevent the most efficient land use.
Design Principles	<p>Development on this site should mediate between the taller schemes coming forward immediately east of the stadium and the Strategic Industrial Land that makes up Wembley Stadium Industrial Estate.</p> <p>Developments within this allocation must ensure they provide strong east-west pedestrian and cycling connections through the site to link to future development to the east between First Way and Second Way. This should be consistent with the pedestrian routes provided the development coming forward through Wembley Masterplan 15/5550 development, north and south of the Dhamecha.</p> <p>Developments must take care to ensure they do not compromise the ability of other sites within this allocation to make the most efficient use of land possible at a later date. They will also need to provide a successful transitional area between them and the adjacent industrial uses on Second Way.</p> <p>Where business premises are being provide on-site, the design should support the amenity of both residential and business uses to ensure their long term compatibility.</p> <p>Development should provide active frontages along First Way and South Way.</p> <p>The proximity to the national stadium and coach/car parking means acceptable noise mitigation measures will be required to address event day activity.</p>
Infrastructure Requirements	Small parcels of land at the north and south of the allocation along Fifth Way and South Way may be required for future road improvements.
Justification	The site is located at the edge of the current approved masterplan for the land around Wembley Stadium and provides a key opportunity to mediate between the tall residential blocks to the west and the low-rise industrial units which make up Wembley Stadium Industrial Estate. The impermeable nature of this site currently does not provide good east-west links to the stadium. There is an opportunity to strengthen these links by creating new streets and pedestrian paths between First Way and Second Way. Whilst previously allocated for non-industrial uses, given Brent's provide capacity status, considerations need to be given to potentially accommodate business premises in the redevelopment of sites that takes place.

**BCSA10: YORK HOUSE**

<p>Site Plan</p>	 <p><small>© Crown copyright and database rights 2018 Ordnance Survey 100025292</small></p>
<p>Existing Use</p>	<p>Commercial office space and associated car parking</p>
<p>Allocated Use</p>	<p>3FE primary school and office space</p>
<p>Indicative Capacity</p>	<p>-</p>


Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		305	-
Address	York House, Empire Way, Wembley, HA9		
Area	0.79ha		
Description of Existing Site	The site is currently occupied by York House, an office building with prior approval for conversion to residential use. The majority of the site is comprised of car parking associated with York House.		
Ownership	Private		
Planning History	<p>York House application 18/2197, prior approval for change of use of part ground, 4<sup>th</sup> to 8<sup>th</sup> floors, part of the 9<sup>th</sup> floor and 10<sup>th</sup> to 15<sup>th</sup> floors from office (Use Class B1) to residential (Use Class C3) involving the creation of 305 residential units (277 studio flats, 12 x 1-bed, 1-person flats and 16 x 1-bed, 2-person flats)</p> <p>Site forms part of application 15/5550 for the redevelopment of land around Wembley Stadium. This plot is shown as YH1. 18/0204 granted permission for a 3 form primary school with 60 place nursery.</p>		
PTAL Rating	5-6a (2031 estimate)		
Planning Considerations	<p>A primary school is required as part of the Wembley Park development. This site is the preferred location and has full planning permission. After an initial desire to have the school open by 2020. Delivery has been delayed as currently a small surplus of primary school places exists in the area and so the school will only be required once the local population has increased significantly.</p> <p>The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>The existing York House is a fully let office building which has proven valuable in accommodating displaced businesses from other nearby office developments lost to residential development. Notwithstanding the prior approval of the site from office to residential the Council has now issued an Article 4 removing permitted development rights. Should the prior approval lapse, the Council will seek the retention of the office use which is clearly viable and performs a valuable role in meeting the needs of businesses within Brent.</p>		
Risks	Residential prior approval implemented. School funding delayed.		
Design Principles	<p>In line with planning application 18/2197 the school should be organised around an internal atrium space and an enclosed courtyard to maintain privacy for the pupils. The entrance to the school will be from the Royal Route.</p> <p>The school should be designed to provide a strong built form along Wembley Hill Road and locate its play ground to the rear away from the principal traffic route.</p>		
Infrastructure Requirements	No specific infrastructure requirements identified further than the primary school allocation.		
Justification	The site contains a large car park which is surplus to requirements. The site falls within Wembley Growth Area and Wembley Town Centre and benefits from good access to local services. Population growth in the borough requires the provision of extra primary school facilities and this site is well suited to being allocated for this use. The existing office which is full is clearly viable and provides good space to meet the needs of Brent's existing businesses as well as complementing the place-making and daytime vitality and viability of the town centre, which therefore merits its retention.		

## BCSA11: COLLEGE OF NORTH WEST LONDON WEMBLEY

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Educational facility for the College of North West London</p>		
<p>Allocated Use</p>	<p>Mixed-use residential-led development</p>		
<p>Indicative Capacity</p>	<p>100</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>-</p>	<p>100</p>	<p>-</p>
<p>Address</p>	<p>Wembley Park Drive, Wembley, HA9 8HQ</p>		
<p>Area</p>	<p>0.24ha</p>		

Description of Existing Site	Site is currently home to the College of North West London Wembley campus. The site is bounded by Wealdstone Brook to the north and Olympic Way to the east. To the west the site fronts onto Wembley Park Drive. To the south are large retail units and associated car parking which is subject to a separate allocation in this Plan.
Ownership	Private
Planning History	No relevant planning history
PTAL Rating	6a (2031 estimate)
Planning Considerations	<p>This site was previously allocated for development in the Wembley Area Action Plan as appropriate for offices, education, student housing or hotel use. These ranges of uses are still considered acceptable. The Council is supportive of the College of North West London's desire to consolidate its existing campuses. The solutions for this are not yet fixed, so it could result in better facilities/ more educational use on this site, or elsewhere within the Wembley Growth Area.</p> <p>The site falls almost entirely within Flood Zones 2 and 3. A Flood Risk Assessment will be required as part of any development coming forward. Waterside development must ensure it is in accordance with policy BGI1 Green and Blue Infrastructure in Brent.</p> <p>The area is identified as acceptable for tall buildings, although development has to take account of its location on the edge the Wembley Park masterplan site and the suburban context around Wembley Park Drive and protected views of the stadium.</p>
Risks	Need to find alternative location for the college
Design Principles	<p>This is a gateway site in that it is one of the main sites viewed when coming out of the Wembley Park station.</p> <p>Building height and massing should build upon the established rhythm in this part of the Wembley Park regeneration scheme, corresponding to the neighbouring buildings and stepping down towards the west of the site. Density should reflect the site's high PTAL and provide the maximum viable amount of affordable housing on site.</p> <p>Active frontages should be provided at ground floor level, particularly along Wembley Park Drive and Olympic Way.</p> <p>There are a number of mature trees within the site adjacent to the Wealdstone Brook. Where possible these should be maintained and integrated into newly provided open space.</p>
Infrastructure Requirements	No specific infrastructure requirements identified. Significant social infrastructure is being delivered nearby as part of the Quintain masterplan.
Justification	The site is located in an area with excellent public transport accessibility levels. The site is likely to be surplus to the college's requirements as part of a process of consolidation of better facilities on another site within Wembley Park. The site's location on Olympic Way provides an opportunity to create a high quality development to act as a gateway from Wembley Park Station to the stadium.

## BCSA12: LAND TO SOUTH OF SOUTH WAY

<p>Site Plan</p>			
Existing Use	Industrial/ D2/ Concrete batching plant		
Allocated Use	Residential-led mixed-use development including business premises.		
Indicative Capacity	500 dwellings		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0		500
Address	South Way, Wembley, HA0		
Area	1.7 hectares		
Description of Existing Site	<p>The site currently comprises a mixture low-rise industrial units (one in use as a night club) and a concrete batching plant. It is bound on the northern edge by South Way, to the south is the Chiltern line. To the west is the national stadium, to the north are industrial premises allocated for residential led mixed use development through Policy BCSA9. To the east a multi-storey car and coach park is being constructed for use in association with the national stadium/ event days. The site was previously allocated for development in the Wembley Area Action Plan, and part has come forward for the car park under construction.</p>		

Ownership	Private
Planning History	None recent of significance to the allocation.
PTAL Rating	2 (2031 estimate)
Planning Considerations	<p>The site falls outside Wembley Town Centre boundary however it does sit within the wider Wembley Growth Area, making it suitable for residential development. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>The site was identified as sensitive to tall buildings in the Wembley Area Action Plan and so should come forward at heights consistent with buildings being constructed further west along South Way on sites SW03/04/05 that step down towards the south and from the east to west of the site.</p> <p>The site has a low PTAL although stands to benefit from better connections to the high levels of surrounding development and is within close walking distance to two rail stations.</p> <p>Prior to its Wembley Area Action Plan allocation, the site was formerly Strategic Industrial Land. It still contains numerous occupied business premises. Notwithstanding the acceptability of residential on site consistent with the previous WAAP allocation, Brent's status as a 'provide capacity' borough in the London Plan means that re-provision of business uses at ground floor/ basement level should be undertaken as part of development consistent with a plot ratio of 0.65.</p> <p>Given the intensification of development in the area it is likely the concrete batching plant will be an important component to supporting delivery of new homes. Residential development on the adjacent sites if in advance of the batching site should be consistent with the agent of change principle and not undermine the operation of that site. This principle should also apply to the operation of the proposed replacement business space provided on site, so that it creates business space that will remain viable for the long term.</p> <p>The proximity to the stadium, railway and adjacent coach/ car parking will require appropriate attenuation measures to deal with noise, vibration and disturbance to create a suitable living environment.</p> <p>Some land within the site may be required for highway improvement measures to South Way/ First Way.</p> <p>As industrial land the site may contain contamination that will need to be satisfactorily addressed to create a safe residential environment.</p> <p>If the business space is provided in a separate building/s to the residential (i.e. not part of a vertically mixed use scheme), this will be required to be built to a standard ready for occupation prior to occupation of the residential development.</p>
Risks	<p>Land is in multiple ownership which may prevent comprehensive redevelopment. Piecemeal development may prevent the most efficient land use.</p> <p>Potential for occupiers to want to remain towards the end or after the end of the Plan period.</p>
Design Principles	<p>The proximity to the stadium means that the height of the development should respect this setting and provide a similar solution to that of development on site SW03/04/05 on South Way, stepping up from the south/ railway side and down towards the stadium from the eastern part of the site.</p> <p>Active frontages should be created along South Way, ground floor business space may be able to provide this role, particularly if buildings are vertically mixed use.</p> <p>Developments must take care to ensure they do not compromise the ability of other sites within this allocation to make the most efficient use of land possible at a later date.</p> <p>Where business premises are being provide on-site, the design should support the amenity of both residential and business uses to ensure their long term compatibility.</p> <p>The proximity to the national stadium and coach/car parking means acceptable noise mitigation measures will be required to address event day activity.</p>
Infrastructure Requirements	Small parcels of land at the north and south of the allocation along South Way may be required for future road improvements.
Justification	<p>The site is located at the edge of the current approved masterplan for the land around Wembley Stadium and provides a key opportunity to create a better environment around the stadium meeting housing needs, but also re-providing employment space for which there is a great need. The site has a number of environmental challenges particularly related to potential noise which will need to be overcome. The visibility of the development from significant distances away from the south means that a quality development is required that does not conflict with protected views.</p>





FIGURE 9 OTHER SITE ALLOCATIONS

REF.	ADDRESS	SIZE (HA)	EXISTING USE	PERMISSION USES	INDICATIVE HOMES	COMMENTS
BCSA13	Former Malcolm House Site,	0.2	Temporary construction storage site	Mixed Use, B1 Office, residential, main town centre uses.	100	Ground floor active frontages required on streets, potential for some land required for junction improvements.
BCSA14	St Joseph's Social Club, Empire Way	0.38	Vacant	Residential/ community use	60	Re-provision of D1 community use, plus additional residential uses. Active frontage at ground floor.
BCSA15	Site W10 Wembley Masterplan	0.5	Car park	Retail at ground, upper floors B1 office or D2 entertainment	0	Development parameters to be consistent with planning permission 15/5550
BCSA16	Site NW04 Wembley Masterplan	0.35	Meanwhile use of public realm	A1-A5, D1 ground, D1, B1/ C1/D2 uppers	0	Outline consent for A1-A5 and B1/C1/ D1 uses and development parameters granted through 10/3032. Council exploring opportunity with Quintain to reduce footprint of potential building and provide public realm/uses complementary to the Civic Centre/ place making.
BCSA17	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.

FIGURE 10 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

REF.	ADDRESS	SIZE (HA)	EXISTING USE	PERMISSION USES	INDICATIVE HOMES	COMMENTS
14/4931	South West Lands SW01/02 South Way	0.25	NA	Residential	125	Site ready
14/4931	South West Lands SW03/04/05 South Way		NA	Residential	739	On site
14/4931	South West Lands SW06/07 South Way	0.1	NA	Residential	30	Site ready
15/4714	Mahatma Gandhi House, South Way		NA	Residential/ Commercial	198	On site
15/5550	Wembley masterplan W03		NA	Residential/ Commercial	196	On site Completion Autumn 2019
15/5550	Wembley masterplan W06		NA	Residential/ Commercial	150	On site Completion Autumn 2019
15/5550	Wembley masterplan W08	0.5	Meanwhile play space	A1 retail ground, Residential/ B1 office Upper floors	197	Either use allowed on upper floors
15/5394	Wembley masterplan NW07/08		NA	Residential/ Commercial	361	On site completion Autumn 2018

REF.	ADDRESS	SIZE (HA)	EXISTING USE	PERMISSION USES	INDICATIVE HOMES	COMMENTS
15/5550	Wembley masterplan NW09	0.4	Construction Storage	Residential/ Commercial	196	
15/5550	Wembley masterplan NW10/11	0.5	Meanwhile Boxpark	Residential/ Commercial	296	
17/4537	1 Olympic Way		Office	Residential/ Commercial	298	Mixture of prior approvals and extensions proposed
15/5550	Wembley masterplan E01/02		NA	Residential	633	On site – completion Autumn 2020
15/5550	Wembley masterplan E03a/b		NA	Residential	743	On site – completion Autumn 2020
16/1404	Amex House North End Road		NA	Residential	195	Autumn 2020 Completion
12/1293	Kelaty House First Way		Vacant Employment	Student Accommodation	240	Start on site. Student rooms to dwellings conversion factor 2.5:1 used.
17/4679	6-10 Hallmark Trading Centre, Fourth Way HA9 0LB		Employment	Residential	10	Prior Approval
16/3408	Blocks A & B Raglan Court, Empire Way – Additional 2 storeys		Residential	Residential	72	

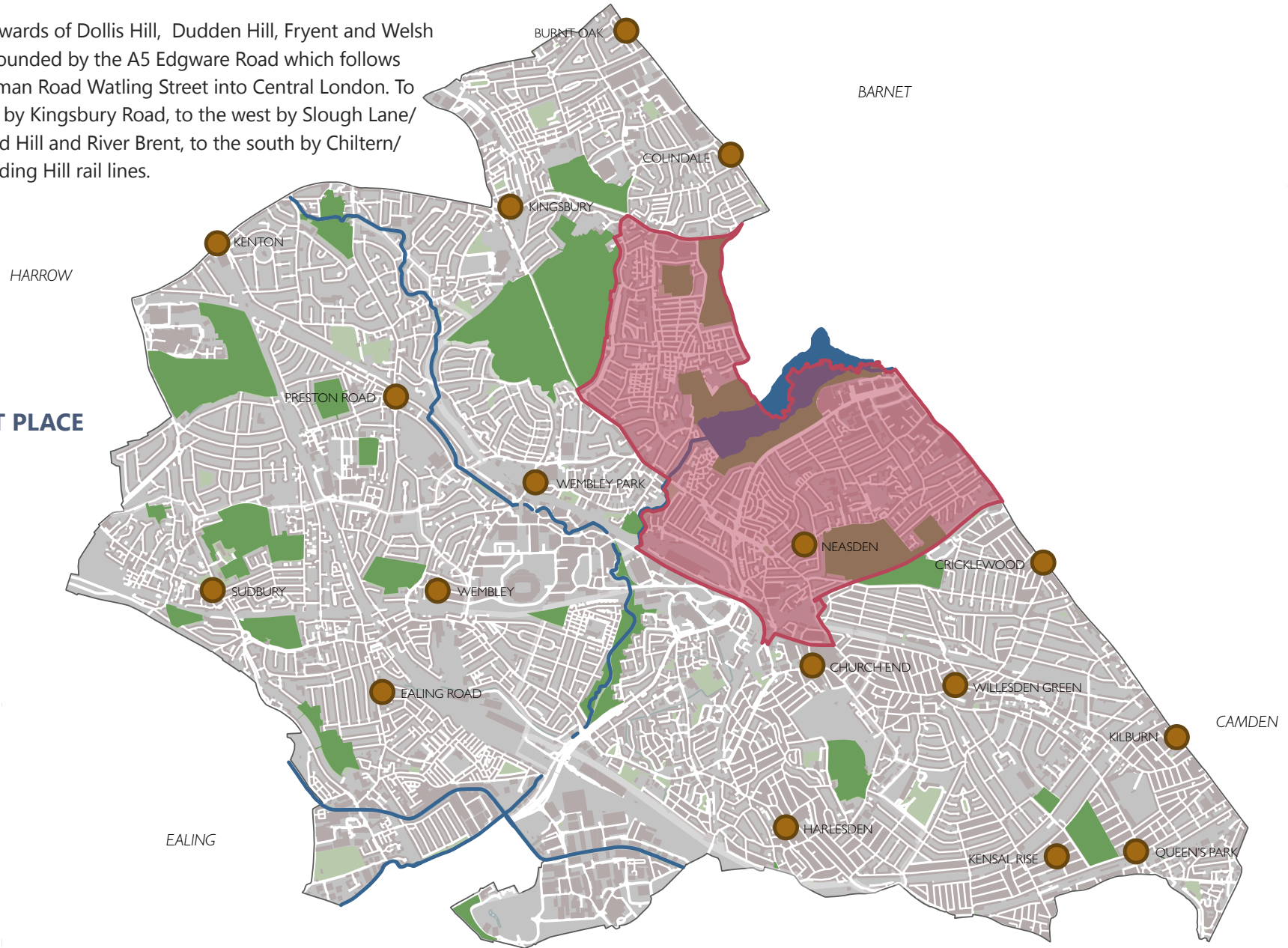
## 5.2 EAST



## EAST

**5.2.1** This place includes the wards of Dollis Hill, Dudden Hill, Fryent and Welsh Harp. To the east it is bounded by the A5 Edgware Road which follows the route of the old Roman Road Watling Street into Central London. To the north it is bounded by Kingsbury Road, to the west by Slough Lane/ Salmon Street/ Blackbird Hill and River Brent, to the south by Chiltern/ Metropolitan/ and Dudding Hill rail lines.

**FIGURE 11 MAP OF EAST PLACE**



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## CHARACTER AND CULTURE

- 5.2.2** The East of the borough comprises largely residential neighbourhoods with limited focal points, the town centre being Neasden to the south, whilst for other parts it is local centres/parades along main movement corridors. It has one significant industrial area at the London scale at Staples Corner and at the Brent scale along Kingsbury Road. It has three conservation areas; St Andrew's, Homestead Park and Neasden Village.
- 5.2.3** The character is predominantly interwar suburban of low rise terraced, semi-detached and detached homes. Exceptions to this are Neasden which also includes some Victorian and Edwardian terraces and other areas of more recent infill on surplus public land or former employment premises.
- 5.2.4** Significant open spaces include the expansive Welsh Harp reservoir/ Neasden sports and recreation ground, the northern part of Gladstone Park, Silver Jubilee Park and Kingsbury recreation ground. The River Brent and Canal Feeder run south through Neasden, along narrow corridors which largely to the rear of properties, are publically inaccessible and heavily engineered. Along the northern edge of Welsh Harp, part of Wood Lane retains a rural character.
- 5.2.5** There are some notable cultural and heritage assets including the Shree Swaminarayan Mandir temple, English Martyrs RC Church, St Andrew's Church which is Grade I listed along with several other listed monuments in its church yard and dwellings in the adjacent area. Welsh Harp is home to a large sailing club and Silver Jubilee Park to Edgware Town and Kingsbury Town football club ground

## TRANSPORT

- 5.2.6** Overall, the public transport offer overall is relatively weak, with only one rail station at Neasden providing access to the Jubilee Line. There are bus services that focus on the principal movement corridors of the A5 Edgware Road,

A4140 Salmon Street, A4088 Blackbird Hill/Neasden Lane, A406 North Circular, A400 6 Kingsbury Road and B454 Church Lane. The limited access to public transport over much of the area promotes a higher reliance on the private car for movement. Part of the London Cycle Network runs through Neasden to the A5 Edgware Road through quiet roads south of the North Circular. Walking routes are predominantly street based, with some recreational ones in parks and open spaces such as Welsh Harp.

## TOWN CENTRES

- 5.2.7** This place only has one town centre at Neasden. This is a centre that is struggling in terms of its vitality and viability. In terms of draw/ offer is essentially operating as a neighbourhood centre for convenience shopping. There are a number local parades along main movement corridors such as Edgware Road, Church Lane and Blackbird Hill/ Neasden Lane, all comprising of predominantly small scale independent traders of local convenience shops and services reflecting Brent's diverse communities, with restaurants and takeaways serving food from all around the world.

## EMPLOYMENT AND EDUCATION

- 5.2.8** Staples Corner is a designated strategic industrial location, meaning it has importance at a London level. Its location near to the A5, A406 and M1 provides potential for good HGV access. It has a range of employment spaces of different sizes but also a high number of trade counter type businesses. Smaller locally significant industrial sites are located along Kingsbury Road and near Neasden station. The area includes the College of North West London Neasden Campus and has a good coverage of primary and secondary schools.



**FIGURE 12 HIGH LEVEL PLAN OF THE PLACE**



## VISION

- 5.2.9** Neasden centre's role of local importance will be maintained, providing a range of retailing including many independent shops, a new street market and a mix of community and cultural facilities meeting needs reflecting its diverse population and some new homes. The local population to support it will be added to by the Neasden Stations Growth Area; a key focus for new housing and employment provided in tall buildings and a new West London Orbital railway station. Improvements to the public realm and townscape, particularly along and around the North Circular and Neasden junction will be sought.
- 5.2.10** Staples Corner will be transformed into a new mixed use community, linking to the Thameslink Brent Cross West station and Brent Cross Opportunity Area in LB Barnet. It will also be a focus for tall buildings. Employment space that meets 21st century needs will be prioritised in association with new homes and social infrastructure. Marking the area's role as a gateway to Brent, there will be significant improvements to townscape on the A5 Edgware Road and A406 North Circular Road, with the Welsh Harp's setting, access and function significantly improved to better reflect its role as an environmental asset and 'green lung' for London.
- 5.2.11** Elsewhere existing low density development and limited potential for improvements to public transport accessibility will mean extensive change is unlikely. Opportunities for new development will however exist, e.g. town centres and intensification corridors along main public transport corridors, active ground floor frontages will wherever possible be maintained, whilst the height of buildings related to these opportunities will typically be up to 5 to 6 storeys.

## PREFERRED POLICY OPTION: BP2 EAST

**Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:**

## CHARACTER, HERITAGE AND DESIGN

**Strengthen local identity and character by:**

- a. **Conserving and enhancing heritage assets, including Church Lane and Neasden Conservation Areas.**
- b. **Respecting the predominantly suburban low rise character of the area.**

**Tall buildings of up to 36 metres (12 storeys) will be limited to the Staples Corner and Neasden Stations' Growth Areas, and stepped down to form a comfortable relationship with adjacent areas.**

- c. **Along the intensification corridors of A5 Edgware Road and A4088 Blackbird Hill/Neasden Lane/ Dudden Hill Lane heights typically of up to 15-18 metres (5 to 6 storeys) are likely to be acceptable.**
- d. **In other areas where designated heritage assets will not be adversely affected heights of buildings should go no higher than two storeys above the prevailing predominant heights.**

## HOMES

- e. **The potential residential development for Staples Corner Growth Area and Neasden Stations' Growth Area will be determined by their respective masterplans, taking account of the need to support employment space on the site. Depending on the capacity of these sites there may be specific requirements around different housing types, such as specialist (older people/ supported/ student) housing and build to rent**
- f. **Potential at various locations in Neasden town centre to support its vitality and viability**
- g. **Intensification corridors – as yet numbers of homes are unknown. It is dependent on whether conversion/ extensions or redevelopment of existing buildings**

## TOWN CENTRES

- h. **Neasden town centre will provide convenience retail for local communities in addition to a street market, restaurant and café offer. Additional small scale retail/ other uses floorspace will be supported to consolidate this role. Improvements to the public realm and connectivity will be sought.**
- i. **Retail parades along Neasden Lane/Blackbird Hill and Church Lane will be supported with flexibility on uses to maintain commercial premises at ground floor, particularly for meanwhile uses or low cost workspaces. Rationalisation on the edges will however be supported if significant long term vacancies indicate a need to reduce commercial capacity.**
- j. **Additional residential on upper floors or making efficient use of plots through redevelopment will be supported in these centres to increase local population catchments.**

## COMMUNITY AND CULTURAL FACILITIES

- k. Securing sufficient physical and social Infrastructure on and off site to support the Staples Corner and Neasden Stations' Growth Areas, in particular ensuring the improvement of the Welsh Harp and its setting.**
- l. Securing the retention of the area's religious buildings**

## EMPLOYMENT AND SKILLS

### Supporting the local economy by:

- m. Retaining and encouraging intensification of employment uses at Kingsbury Locally Significant Industrial Site.**
- n. Supporting transformational change of Staples Corner to provide colocation/intensification and a wide range of new business premises fit for modern day occupiers in association with a new mixed use community.**
- o. Retaining/ seeking re-provision of small scale employment in association with new development**
- p. Supporting the relocation of College of North West London to a purpose built facility elsewhere in the borough through redevelopment of the existing Neasden site.**

## OPEN SPACE AND BIODIVERSITY

- q. Contribute to high quality, well-used open spaces and wildlife corridors to include:**
- r. Enhancement of Welsh Harp's and River Brent's recreational and ecological offer**
- s. Maintaining and enhancing Kingsbury Recreation Ground, Silver Jubilee Park and Gladstone Park**
- t. Tree planting and associated landscaping around North Circular Road/ A5 and other transport corridors.**

## TRANSPORT

- u. Safeguard land for the West London Orbital route and associated infrastructure.**
- v. Reduce traffic dominance and enhancing the A5 corridor and North Circular Road and public transport corridors through public realm improvements to healthy streets standards.**

- w. Direct development to and increase patronage/ services on public transport corridors.**

## JUSTIFICATION

### CHARACTER, HERITAGE AND DESIGN

- 5.2.12** Although of slightly denser character in the south towards Neasden where there are a higher concentration of terrace properties, the area as a whole is typically low rise, low density suburban in character. It is three or four storey properties in a few places along transport corridors/ in Neasden Town Centre, but elsewhere almost all uniformly two storey. The area has not been identified for substantial change in recent Local Plans, containing no Growth Areas. Where development has occurred, it has typically been infill, low rise and low density.
- 5.2.13** The limited extent of heritage assets focused in Neasden and Church Lane Conservation Areas might be seen as providing opportunity for extensive change. Nevertheless, the relative uniformity of the character, particularly in terms of height limits radical change, as does a range of other factors, most notably limited public transport accessibility.
- 5.2.14** Tall buildings will not be in character with this place. As such opportunities for buildings over 6 storeys are restricted to those Growth Areas which it is proposed will undergo radical change, related to major improvements in public transport accessibility where there is also the need to secure a wide range of benefits and be consistent with the London Plan's priority of development near public transport.
- 5.2.15** Elsewhere opportunities for taller buildings (up to 5-6 storeys) are considered appropriate along transport corridors where the larger scale buildings in the area already exist.

### HOMES

- 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 employment and residential floorspace. A masterplanning exercise will be undertaken to identify the appropriate mix of uses, form of development with a view to improving employment opportunities as well as



homes. Such large scale areas are also likely to require some on site social infrastructure which will need to be identified, taking account of needs of the proposed population and capacity/ ability to meet needs in existing or extended facilities.

- 5.2.17** In these Growth Areas land designated as SIL or LSIS in the previous Local Plan will need to address the requirement to replace or intensify employment uses too. A range of employment space will need to be provided, although only a very limited focus on office space will be appropriate.
- 5.2.18** In advance of adoption of masterplan supplementary planning documents which will seek comprehensive solutions for the areas, small scale release of sites will be resisted, unless it can be shown that it will not undermine the outcomes of any likely adopted masterplan.
- 5.2.19** Elsewhere the opportunity to provide homes is likely to be in Neasden town centre and along intensification corridors, either through redevelopment, or as small scale infill/redevelopment/extensions and conversions. Delivery of additional homes is considered more uncertain in these areas, due to competing demands on existing buildings in many cases, e.g. existence of extended family housing , together elsewhere with occupation/ ownership by multiple people/ organisations.

## TOWN CENTRES

- 5.2.20** The principal centre in this area is Neasden, which essentially provides a neighbourhood level of service/ attractiveness. It is a Council priority centre with an associated action plan being developed. Competition from the internet and competing centres will provide challenges in maintaining its current relevance for the locality as a destination for retail or other activities. There is very limited need for additional retail and leisure/ drinking in the area in the future. As such flexibility will be the key to ensure limited vacancy at ground floor level through, for example, reuse of retail premises for workspace and promotion of development opportunities where they exist. This could be through potentially turning peripheral ground floor commercial uses to residential/ promoting redevelopment of buildings/ inefficient spaces to provide more living accommodation.
- 5.2.21** Elsewhere the role of the extensive retail parades along Neasden Lane, Church Street and A5 Edgware Road in providing for local convenience and

service needs will be supported. These centres are also likely to find trading conditions challenging and as such flexibility of premises will be favoured to maintain commercial ground floor uses, until such a time as this can be shown to be unviable, when consideration will be given to potentially contracting their length to smaller cores.

## COMMUNITY AND CULTURAL FACILITIES

- 5.2.22** The need for new community facilities is likely to primarily be within and around the new Growth Areas. This will be resolved through the masterplanning exercise. It is recognised that there are continued unmet demands for religious buildings and youth facilities, which these may accommodate.

## EMPLOYMENT AND SKILLS

- 5.2.23** The principal areas of industrial employment are currently the designated areas at Staples Corner, Kingsbury and Neasden. As identified Staples Corner and Neasden will be taken forward as Growth Areas. This will not be at the expense of employment space. Much of these areas have suffered from very low levels of investment in premises over the years. As such their usefulness/ levels of employment provision are low. Where investment has been made, much has been in quasi retail/ trade counters.
- 5.2.24** Consistent with London Plan policy, the Council is seeking to ensure intensification of employment use in modern fit for purpose premises. Providing the incentive to develop these however is only considered likely to happen with cross-subsidy from other more lucrative uses. The Council recognises that to date the mixing of larger scale employment uses with residential development in particular has been limited and needs careful management to be successful, creating good environments for communities and businesses.
- 5.2.25** The Kingsbury employment area retains principally clearly defined boundaries, with very little encroachment from non-employment 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 employment use through encouraging investment only in employment uses.
- 5.2.26** The proposed redevelopment of the College of North West London site will

allow the college to amalgamate sites elsewhere in the borough and invest in its future. The college is particularly important in allowing Brent residents to attain skills and training that will enable them to participate in the jobs market. As such development that maximises the potential to support this and wider local plan objectives on its existing site will be supported.

## OPEN SPACE AND BIODIVERSITY

**5.2.27** Whilst the north of this place is well served by open spaces, there are areas of deficiency to the south. There are limited opportunities to secure additional open spaces through redevelopment. On the large scale sites, whilst some space will be provided, the existing built up nature, combined with the need to generate sufficient values to ensure viability will be a challenge. It will therefore be important to ensure the quality of existing open spaces are enhanced, even where scoring highly such as at Welsh Harp, Silver Jubilee Park, Kingsbury Recreation Ground and River Brent corridor. The Welsh Harp has the potential to offer so much more in terms of accessibility for recreation and leisure use and ecology. Its proximity to development areas increases the potential to improve its setting and also provide developer funding for its improvement.

## TRANSPORT

**5.2.28** The West London Orbital, which will make use of the existing Dudding Hill freight line is a key opportunity to improve passenger orbital links and connect the area to High Speed 2 and Elizabeth Line and Old Oak and to the east Thameslink at Brent Cross West. This will significantly improve public transport accessibility levels in areas which are currently poorly served. The proposed development at Neasden looks to identify suitable space for the line and any station.

**5.2.29** The A5 corridor and North Circular Road are important gateways into both Brent and Central London. They are very heavily trafficked, which creates an unattractive environment both for residents living along the route and businesses. Reducing car dominance and creating a more attractive environment designed to healthy streets standards, will have a positive impact on residents by helping to mitigate poor air quality through tree planting. It will also benefit businesses, particularly those operating in Neasden Town Centre and Staples Corner, by creating an attractive environment.

**5.2.30** Other existing public transport corridors along Neasden Lane/ Blackbird

Hill have reasonable levels of service. Putting additional development along them however provides for better use of capacity and levels of frequency to potentially be enhanced. Elsewhere development will not be promoted to such an extent, taking account of limited access to public transport, which might otherwise encourage increased car dependency at a time when ideally use of the car will be reduced across the Borough's roads.

## KEY SITE ALLOCATIONS

Neasden Stations Growth Area

Staples Corner Growth Area

Coombe Road

Cricklewood Bus Depot.

## OTHER POLICY GUIDANCE

- Staples Corner Growth Area Master Plan/Supplementary Planning Document/Area Action Plan (forthcoming)
- Neasden Stations Growth Area Master Plan/Supplementary Planning Document/Area Action Plan (forthcoming)

## BEGA1 NEASDEN STATIONS GROWTH AREA


<p>Site Plan</p>			
<p>Existing Use</p>	<p>Primarily employment uses comprising light industrial, storage and waste recycling and associated activities, some residential, a College of North West London campus and Neasden underground station/railway land.</p>		
<p>Allocated Use</p>	<p>Growth Area – Strategic Industrial Location and Locally Significant Industrial Sites subject to co-location and intensification, new passenger railway line infrastructure and residential development.</p>		
<p>Indicative Capacity</p>	<p>Not yet known, subject to a masterplanning process which will provide additional clarity. Estimated using standard densities.</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>0</p>	<p>735</p>	<p>1265</p>
<p>Address</p>	<p>Neasden Lane, Denzil Road and Selbie Avenue NW10.</p>		



Area	11.5 ha
Description of Existing Site	The site comprises Strategic Industrial Location and Locally Significant Industrial Sites, which incorporate light industry, storage, waste processing and open storage. It also includes a campus of the College of North West London which is relocating to a new site in Wembley. In between is some two storey residential, semi-detached and terraced, some of which is a former Council estate. It also includes the Neasden Underground Station, with associated land and land on the West London Orbital rail route. To the south is a petrol station currently in use.
Ownership	Private and public ownership
Planning History	No relevant planning history
PTAL Rating	3-6a both for now and in 2031. The potential West London Orbital station at Neasden will increase PTAL levels further.
Planning Considerations	<p>A significant part of the site is Strategic Industrial Land/ Locally Significant Industrial Site. The proximity of Neasden station means that consideration of this site for co-location/ intensification consistent with London Plan policies is appropriate. The potential for a further station on the West London Orbital line in the area together with the relocation of the College of North West London provide an opportunity for a much larger scale of development to be planned as a Growth Area. This will be subject to a masterplan process to comprehensively identify how the area can best maintain and ideally increase useable employment floorspace (predominantly light industrial, industrial and storage and distribution), plus relate to and provide sufficient space to accommodate the new and existing transport infrastructure as part of a new mixed use community. Until a master plan has been completed/ adopted by the Council, no redevelopments, particularly to non-industrial/ residential will be permitted in the area.</p> <p>The disparate land ownership also means that the Council will have to be content that the necessary social and physical infrastructure to support the Growth Area's comprehensive change can be provided. This will either be through evidence of landowners working together and having mechanisms such as equalisation agreements in place, or that an alternative is available to the Council of capturing sufficient contributions and the necessary land from proposed developments to deliver the infrastructure.</p> <p>It sits within an Air Quality Management Area, as such development will have to seek to be air quality neutral and ensure occupants have an acceptable level of air quality. The Dudding Hill Line and Jubilee/ Metropolitan Line corridors Sites of Nature Conservation Grade I.</p> <p>None of the site is within Flood Zone 3 for fluvial flooding. Parts are however in zone 3 for surface water, much of this is highway land or the rail corridors, although the industrial land south of Neasden station is also susceptible. As such a sequential approach to location of uses and buildings will be required on these sites to ensure that the risk of flooding on and off site is not unacceptably increased. More detailed assessment will be required through a site specific flood risk assessment.</p> <p>The site contains no recognised heritage assets. A locally listed building Shortcroft Mead Court exists on the other side of Dudden Hill Lane.</p> <p>Neasden Lane and Dudden Hill Lane are reasonably heavily trafficked. They provide reasonable pedestrian routes, but could be improved through wider pavements, tree planting and additional overlooking/ active frontages. Regular bus services run along these roads and provide relatively good public transport accessibility to other locations in Brent. The proposed West London Orbital station will provide wider connectivity with Brent Cross/ West Hampstead though to Hounslow and improve PTAL.</p> <p>It also contains waste facilities which need to be addressed in any development, either off or on-site as there is a need to accommodate these types of facilities in the borough. Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. Potential noise associated with the roads and adjacent employment uses will have to be addressed in design of development.</p> <p>As a transformational area the area has the potential for tall buildings and has been identified as such in the Tall Building Strategy. This potential including appropriate heights, extent and location of these will be identified in the masterplan. The proximity and essentially two storey suburban character of adjacent areas will however require heights to step down towards these edges. The scale of development also means that a district energy/ heating system should be delivered.</p> <p>Apart from the railway corridors there is very little of ecological value inside the area; incidental planting is limited. There are a number of trees along the Neasden Lane and Denzil Road, a few are street trees, some form part of planting schemes associated with development and some are self-sown. The trees do provide some visual amenity however, their removal and replacement with higher quality specimens of more appropriate trees for the setting would be acceptable.</p> <p>There is a notifiable pipeline bordering the site that is allocated for the potential station and parts of the residential areas south west of the site.</p>

Risks	<p>Fragmented nature of land ownership could increase time taken to deliver and if not properly managed a piecemeal rather than comprehensive approach to redevelopment, resulting in a disjointed environment and inadequate infrastructure.</p> <p>Non-delivery of the West London Orbital line/ associated station.</p> <p>CPO of properties/ land to deliver the rail infrastructure/ station and regenerate existing housing sites.</p> <p>GLA policy in relation to acceptability of proposals on SIL.</p>
Design Principles	<p>To be fully drawn out in any future masterplan. Key points to address will be ensuring successful co-location/ intensification to allow the area to prosper as an employment location. Integration of the new station and links between it and Neasden station within the new townscape. Recognition of the gateway location of the area. Providing higher quality public realm/ pedestrian/ cyclist environment particularly in allowing movement along Neasden Lane and Dollis Hill Lane. The edges of the development responding to the adjacent suburban housing context and the significant noise constraints provided by the railway lines.</p>
Infrastructure Requirements	<p>Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site in particular. Improved crossings/ street design/ public realm, green infrastructure, open space and space for proposed public transport improvements. Religious buildings and youth facilities are particular current needs that need consideration as well as specialist housing needs.</p>
Justification	<p>The site adjacent to Neasden Lane is currently mostly low intensity used Strategic Industrial Land and Locally Significant Industrial Sites that are adjacent to a station with very high public transport accessibility. This accessibility makes them from a planning perspective a prime site for more intensive use of land. Given Brent's status as a 'provide capacity' borough for employment space in the London Plan, the SIL and LSIS also provide a vital role in meeting future employment needs. Site owners/ developers are showing interest in bringing sites forward. The proposed West London Orbital route requires appropriate safeguarding of land, but also provides an opportunity to increase the area's accessibility and potential for regeneration. In addition a large potential development site is the College of North West London's campus which is to be disposed of to fund a move to Wembley and improved facilities. Taking these factors together there is an opportunity to properly plan a wider 'Growth Area'. This can comprehensively reconsider the area's role, to potentially increase its performance as an employment area, but also address other strategic needs, such as using land more effectively, providing new homes, ensure successful delivery of a key piece of transport infrastructure and improve the image of Brent on a gateway site. It also will assist in providing additional population to support Church End and Neasden town centres.</p>

## BEGA2 STAPLES CORNER GROWTH AREA

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Primarily B1, B2, B8 and Sui Generis Employment Uses, trade counters and some retail, cash and carry, restaurants and residential.</p>		
<p>Allocated Use</p>	<p>Growth Area – Strategic Industrial Location subject to co-location and intensification</p>		
<p>Indicative Capacity</p>	<p>Not yet known, subject to a masterplanning process which will provide additional clarity – estimate of numbers used at this stage.</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
		<p>200</p>	<p>2600</p>
<p>Address</p>	<p>Staples Corner Strategic Industrial Land, adjacent to the Edgware Road and North Circular Road</p>		
<p>Area</p>	<p>42.7 hectares</p>		

Description of Existing Site	<p>The site covers a multiple of light industrial, heavier industrial and distribution uses in differing types of buildings, from the relatively modern fit for purpose industrial to the majority of older poor quality buildings that have received limited investment. As the site is very visible from heavily trafficked roads there are also many wholesale, trade counter type/ showroom operations related to building/ home improvement and car sales, plus self-storage and a large Chinese supermarket with a distinctive landmark building. Predominantly buildings are single storey, some contain two storey office elements. There are a small number of three storey and four storey buildings. Exceptionally two former office buildings of 4 and 7 storeys have through permitted development been converted into flats.</p> <p>Some buildings face outwards, others present their backs to streets. Multiple small site ownerships, plus the development of the area in a lot of cases before statutory town planning system came into effect has resulted on some sites in haphazard building placement, poor access arrangements and a poor public realm. As a gateway to Brent and wider London for many people passing through, it gives an extremely poor initial impression.</p> <p>The site is bounded on the north by the Welsh Harp and Neasden Recreation Ground open spaces. To the east is the A5 Edgware Road, beyond that warehousing and the Brent Cross/ Cricklewood Opportunity Area in Barnet. To the south and east there is residential development, principally semi-detached or terraced two storey dwellings and some very limited number of 3-6 storey properties.</p> <p>The North Circular Road cuts through the northern part of the area. It is a very heavily trafficked road. This together with the Edgware Road is essentially designed as urban motorway, elevated in part and presenting a very hostile 'concrete jungle' environment, particularly for pedestrians. This most intense around the Staples Corner roundabout. There are a number of footbridges across the North Circular. Direct vehicular access to and from these main roads is mostly limited, with more recent developments channelled towards minor roads. The dual carriageway with barriers means if turnings are missed, long diversions are required to return to that point by vehicle.</p>
Ownership	Private Sector
Planning History	None of a substantial nature specific to the relevance of the policy allocation.
PTAL Rating	3 principally along the North Circular Road, Edgware Road, Oxgate Lane and Humber Road and 2 away from these roads. This is both currently and projected in 2031. This does not currently factor in the potential improvements to public transport offered by the West London Orbital station at Brent Cross West.
Planning Considerations	<p>The site is Strategic Industrial Land and is proposed as a Growth Area and for co-location/ intensification consistent with London Plan policies. It will be subject to a masterplan process to comprehensively identify how the area can best maintain and ideally increase useable employment floorspace (predominantly light industrial, industrial and storage and distribution) whilst potentially providing a new mixed use community. Until a master plan has been completed/ adopted by the Council no redevelopments, particularly of non-industrial/ residential will be permitted in the area. The disparate land ownership also means that the Council will have to be content that the necessary social and physical infrastructure needed to support the Growth Area's change can be provided. This will either be through evidence of landowners working together and having mechanisms such as equalisation agreements in place, or that an alternative is available to the Council of capturing sufficient contributions and the necessary land from proposed developments to deliver the infrastructure.</p> <p>Across the Edgware Road within Barnet the area is designated as the Brent Cross Opportunity Area and is subject to substantial growth of housing, employment and retail floorspace. Ideally the masterplanning process will address this wider growth context and seek to explore the extent to which Staples Corner Growth Area can seek to create a unified place/ townscape between the two.</p> <p>It sits within an Air Quality Management Area, as such development will have to seek to be air quality neutral and ensure occupants have an acceptable level of air quality. The northern edge is adjacent to Welsh Harp and Neasden Recreation Ground, these have a variety of designations including Metropolitan Open Space, Site of Special Scientific Interest, Site of Nature Conservation Grade I and Local Nature Reserve. The masterplanning also needs to consider the extent to which the potential of this area as a recreational and environmental asset can be enhanced in association with the Staples Corner Growth Area.</p> <p>None of the site is within Flood Zone 3 for fluvial flooding, parts are however in zone 3 for surface water, principally although not exclusively this is within highway land.</p> <p>The site contains recognised heritage assets in the form of Sites of Archaeological Interest at Oxgate Field (north of North Circular) and is in close proximity to one at Oxgate Farm (Coles Green Road) which is also contains 2 Grade II* listed buildings. Development in or adjacent to these areas will require the appropriate assessments to ensure the assets and their settings are preserved or enhanced. It has no locally protected views, but potentially parts could benefit from a high quality outlook across the Welsh Harp or if opened up allow better views from the North Circular to it. Views from the Welsh Harp need consideration in terms of design to improve its setting.</p>

<p>Planning Considerations</p>	<p>The North Circular Road is very heavily trafficked, the Edgware Road less so, but still busy. They are managed by TfL as part of the strategic road network. They are a significant barrier to pedestrian movements, which are enabled by foot bridges and traffic light controlled crossings. The Edgware Road in particular at this point appears heavily over-engineered for the volume of traffic that uses it. Improving the pedestrian and cycling environment will be a particular challenge, especially to the carriageway both in terms of not adversely affecting capacity and cost to amending highway structures. Regular bus services along these roads and others provide relatively good public transport accessibility. Brent Cross West Thameslink station will open in 2024 which could also be served by the West London Orbital in 2026. Therefore wider connectivity with London and the south east is potentially very good in the future from this station. Better pedestrian links across the A5 and North Circular Road should be provided.</p> <p>Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. Potential noise associated with the roads and adjacent employment uses will have to be addressed in design of development.</p> <p>As a transformational area there is the potential for tall buildings which has been identified in the Tall Building Strategy. This potential including appropriate heights, extent and location of these will be identified in the masterplan. The proximity and essentially two storey suburban character of adjacent areas will however require heights to step down towards these edges. The scale of development also means that a district energy/ heating system should be delivered.</p> <p>There is very little of ecological value inside the area as incidental planting is limited. There are few trees, the best examples being street trees on Oxgate Lane and a bank of poplars on Coles Green Road, probably from the 1950s. Whilst of significant visual amenity, the poplars due their age and increasing propensity for limbs to fail/fracture are unlikely to be suitable for long term retention in their current form.</p>
<p>Risks</p>	<p>Fragmented nature of land ownership could increase time taken to deliver and if not properly managed a piecemeal rather than comprehensive approach to redevelopment, resulting in a disjointed environment and inadequate infrastructure.</p> <p>TfL and Highways England control of adjacent highways where the priority will be on maintaining highway capacity and limiting potential disruption, potentially at the expense of a higher quality public realm.</p> <p>GLA planning policy approval in relation to the existing SIL allocation.</p>
<p>Design Principles</p>	<p>To be fully drawn out in any future masterplan. Key points to address will be ensuring successful co-location/ intensification to allow the area to prosper as an employment location. Recognition of the gateway location of the area. Providing higher quality public realm/ pedestrian/ cyclist environment particularly in allowing movement across roads and linking to Brent Cross West station/ adjacent Opportunity Area in Barnet. Opening up views to and enhancing views from Welsh Harp and improved physical connections. The edges of the development responding to the adjacent suburban housing.</p>
<p>Infrastructure Requirements</p>	<p>Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site in particular. Improved crossings/ street design/ public realm, green infrastructure, open space and public transport accessibility. Religious buildings and youth facilities are particular current needs that need consideration as well as specialist housing needs.</p>
<p>Justification</p>	<p>The site is the largest piece of Strategic Industrial Land that falls within the Local Plan boundary. Given Brent's status as a 'provide capacity' borough in the London Plan, it will perform a vital role in meeting future employment needs. Currently although vacancy is low, it is not intensively used, contains many old buildings that have had very limited investment, includes many non-business uses which could be accommodated outside dedicated employment areas and is an overall poor quality environment in a gateway location. The development of the Brent Cross Opportunity Area across the Edgware Road in LB Barnet with its associated planned extension of Brent Cross shopping centre, provision of office development, residential and the opening of Brent Cross West Thameslink station and potentially the West London Orbital rail route will change the local environment and the area's accessibility. It provides an opportunity to reconsider the area's role, to potentially increase its performance as an employment area, but also address other strategic needs, such as providing new homes, improving the image of Brent on a gateway site, increasing the visibility and relevance of Welsh Harp as an environmental asset and addressing significant physical barriers to pedestrian and cycle movement across the borough.</p>





## BESA1 COOMBE ROAD

Site Plan



Existing Use	Part Shurgard self-storage unit, part light industrial/ employment uses and part McDonalds restaurant/ drive thru.		
Allocated Use	Mixed use development including on the ground floor and upper floors if needed to accommodate the required floorspace, replacement of the existing employment B1-B8 floorspace and on the McDonalds site A1-A5 and/or B1-B8 employment uses, with the remainder being residential on the upper floors.		
Indicative Capacity	3886 sqm B1-B8 on the existing employment sites (0.5 plot ratio) and 400 sqm A1-A5 uses/B1-B8 on the McDonalds site (replacement of existing floorspace, with potential for more employment), plus 194 dwellings.		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	35	37	122
Address	Land at Coombe Road		
Area	1.35 hectares		

Description of Existing Site	The site comprises four different land ownerships. A two storey Shurgard self-storage facility on the south west, and single storey McDonalds drive-thru on the south east, and 1-2 storey light industrial premises on the north east and north west. The site is bounded on the west by the River Brent and on the east by the Brent Canal Feeder, beyond which are two storey residential properties. The north is bounded by Roger Stone Court, a residential block of 3-4 storeys and the south by Neasden Lane, beyond which is an open space.
Ownership	Private Sector
Planning History	None particularly relevant to the allocation.
PTAL Rating	3 existing and forecast to 2031
Planning Considerations	<p>The site has no designated heritage assets. The Neasden Conservation Area is located to its south east approximately 30 metres away at its closest. The site is bisected by Coombe Road which provides access to Roger Stone Court. Regular bus services provide links to Wembley and Neasden underground stations. Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation.</p> <p>Parts of the site fall within fluvial flood zone 3. A site specific Flood Risk Assessment will be required and a sequential approach to the local of uses followed.</p> <p>There is limited green infrastructure on site. There is some minor recent landscaping on the McDonalds site. There is a semi mature Ash tree along Coombe Road which will need to be kept. There are also some trees adjacent along the River Brent and Brent Canal Feeder; both of these corridors are also Sites of Nature Conservation Value Grade 2.</p>
Risks	The main risk is the appetite of the existing owners/ occupiers, particularly McDonalds and Shurgard to redevelop parts of the site.
Design Principles	<p>Development of up to 5/6 storeys (with the upper storey set back so as not to be visible from the adjacent pavement) with a step down to four storeys (top storey set back) on the edges of the will be acceptable on the Neasden Lane frontage. On Coombe Road up to 5 storeys will be acceptable with a set-back on the upper storey and reduction down to 4 storey on the edges. Within the remainder of the site up to 5 storeys will be acceptable.</p> <p>A contemporary design will be supported, particularly where development takes influence from the positive characteristics of the surrounding buildings and structures, for example in breaking up the facades in a manner consistent with the plot width/ rhythm of the terraces along Neasden Lane.</p> <p>Active frontages will be maximised at ground floor on Neasden Lane and Coombe Road. Ideally these will be principally provided by the employment/ commercial elements.</p> <p>The areas adjacent to the River Brent and Brent Canal Feeder should be set back from the boundary, appropriately landscaped and include a footpath to allow for potential future public pedestrian routes adjacent to the watercourses.</p>
Infrastructure Requirements	<p>Delivery of the waterside pedestrian routes and their future potential to be made available for public use attaching to future additions will be sought through a S106.</p> <p>A financial contribution towards real time information being provided at the bus stop on the opposite side of the road will be sought.</p>
Justification	<p>The site is used to a relatively low intensity given its position adjacent to a main movement corridor. The McDonalds in particular is a poor piece of townscape inconsistent with the small set back from the edge of pavement/ strong building line along the rest of the road. Other recent developments along Neasden Lane indicates that sites can be used more intensively to provide mixed use schemes that provide employment opportunities/ services as well as adding to the dwelling stock. The site has good access to public transport and local infrastructure including shops and open spaces. The Council needs to ensure continued provision of employment space, so will seek its retention of employment uses on site. The existing McDonalds is a draw that helps the vitality and viability of the parade. Its replacement or provision of alternative town centre uses on this part of the site, if consistent with the size and role of the retail parade, will be supported. The sites are in close proximity to watercourses and partly at risk of flooding. The location of buildings and their design will have to ensure that there is no unacceptable risk to building occupants, or property and people elsewhere as a result of any proposed development. Setting back buildings from the watercourse provides an opportunity for their enhancement and also potential future public access along pedestrian routes.</p>

## BESA2 CRICKLEWOOD BUS DEPOT EDGWARE ROAD

<p>Site Plan</p>	
<p>Existing Use</p>	<p>London Transport Bus Depot.</p>

Allocated Use	Mixed use development including replacement bus depot in lower ground and upper floors (offices on Edgware Road frontage if needed to accommodate the required floorspace, with the remainder being residential on the upper floors.		
Indicative Capacity	10,000 sqm Sui Generis on the existing employment sites floorspace required to replace bus depot/ create suitable residential environment above, plus 194 dwellings.		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	0	202
Address	London Transport Bus Depot 329 Edgware Road NW2 6JP		
Area	1.35 hectares		
Description of Existing Site	The site comprises two separate land ownerships, the majority by Transport for London. A part single storey and three (+ basement) bus depot fronting Edgware Road to the east, with associated bus parking across the majority of the site. In addition there is a single storey café on the south eastern corner along Edgware Road. The site drops away from Edgware Road. It is bounded on the east by the Edgware Road. On the opposite side of Edgware Road are a mixture of industrial/ self- storage and retail premises, forming part of the Colindale Area Action Plan boundary in LB Barnet. The north and south are bounded by railway lines which is elevated on the south and at grade on the north. There is two storey residential to the north and a mixture of single storey retail/ three storey residential to the south.		
Ownership	Public and Private Sector		
Planning History	None particularly relevant to the allocation.		
PTAL Rating	1b and 3 existing and forecast to 2031		
Planning Considerations	<p>The site has no designated heritage assets and there are none in close proximity. Six regular bus services provide links north and south along the Edgware Road to Alperton, Brent Cross, Brent Park, Edgware, Golders Green, Hammersmith, Kilburn, Paddington, Victoria and White City.</p> <p>Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation.</p> <p>Parts of the site towards its western end fall within surface water flood zone 3. A site specific Flood Risk Assessment will be required and a sequential approach to the local of uses followed.</p> <p>There is very limited green infrastructure on site. The majority is adjoining in the railway land which is a Site of Important Nature Conservation Grade 1, forming part of a wider corridor, which includes trees and scrub. Development should not undermine these designations. There is a semi mature and two newly planted London Plane street trees on Edgware Road which will need to be kept.</p> <p>The site is a Locally Significant Industrial Site. Any proposal must ensure the replacement of the bus depot, or if operationally this is not required, must provide 0.45 of the site with viable employment floorspace for the long term. Commercial development along Edgware Road at ground floor level may also be appropriate if the minimum employment floorspace is provided. Residential will be appropriate on the upper floors of any redevelopment if it can be shown to not undermine the bus depot/ future employment uses.</p>		
Risks	The main risk is the availability of the site for development in the context of operational requirements from Transport for London. Increasing importance of public transport, plus land pressures mean sites to relocate to will be scarce, whilst redevelopment may well prove difficult whilst the site remains operational.		
Design Principles	<p>Development of up to 6 storeys (with the upper storey set back so as not to be visible from the adjacent pavement) along Edgware Road with a step down to five storeys (top storey set back) on the edges of the will be acceptable.</p> <p>A contemporary design will be supported, particularly where development takes influence from the positive characteristics of the surrounding buildings and structures, for example in breaking up the facades in a manner consistent with the plot width/ rhythm of the traditional terraces along Edgware Road.</p> <p>Active frontages will be maximised at ground floor on Edgware Road. Ideally these will be principally provided by the employment/ commercial elements and residential entrances.</p>		
Infrastructure Requirements	<p>Additional vehicular entrance for the residential that does not conflict with the bus movements/ pedestrian crossing.</p> <p>A financial contribution will be sought to additional street tree planting along Edgware Road outside the site.</p>		

Justification	<p>The site is used to a relatively low intensity in terms of its building occupancy given its position adjacent to a main movement corridor. It forms a poor piece of townscape along much of its length inconsistent with the edge of pavement/ small set back from the edge of pavement/ strong building line along the more traditional parts of the road. Other recent developments along this road indicates that sites can be used more intensively to provide mixed use schemes that provide employment opportunities/ services as well as adding to the dwelling stock. The site has the potential to deck over the bus garage use and provide an acceptable residential environment above. It has good access to public transport and local infrastructure including shops, open spaces and schools.</p> <p>The Council needs to ensure continued provision of employment space, so will seek the retention of the bus depot or replacement employment space on this site. In addition there might be some scope for provision of town centre uses along the Edgware Road frontage, if consistent with the size and role of a retail parade, will be supported. The site due to its fall and location below elevated rail corridors appears to be at risk of surface water flooding. The location of buildings and their design will have to ensure that there is no unacceptable risk to building occupants, or property and people elsewhere as a result of any proposed development. Setting back buildings from the railway lines provides an opportunity to enhance the wildlife corridors.</p> <p>The site allows for taller buildings than currently exist on site, but is not a location regarded as acceptable for taller buildings than those set out in the design principles.</p>
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### FIGURE 13 OTHER SITE ALLOCATIONS

REF.	ADDRESS	SIZE (HA)	EXISTING USE	ALLOCATED USE	INDICATIVE HOMES	COMMENTS
BESA3	5 Blackbird Hill		Vacant school	D1 and Residential	30	Replacement D1 floorspace required.
BESA4	All units 4-9, Gladstone Parade and garages rear of 4-9, Gladstone Parade, Edgware Road, Cricklewood, London NW2 6JS		Commercial/ residential	Commercial Residential	38	Ground floor commercial/ active frontage, residential uppers

### FIGURE 14 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

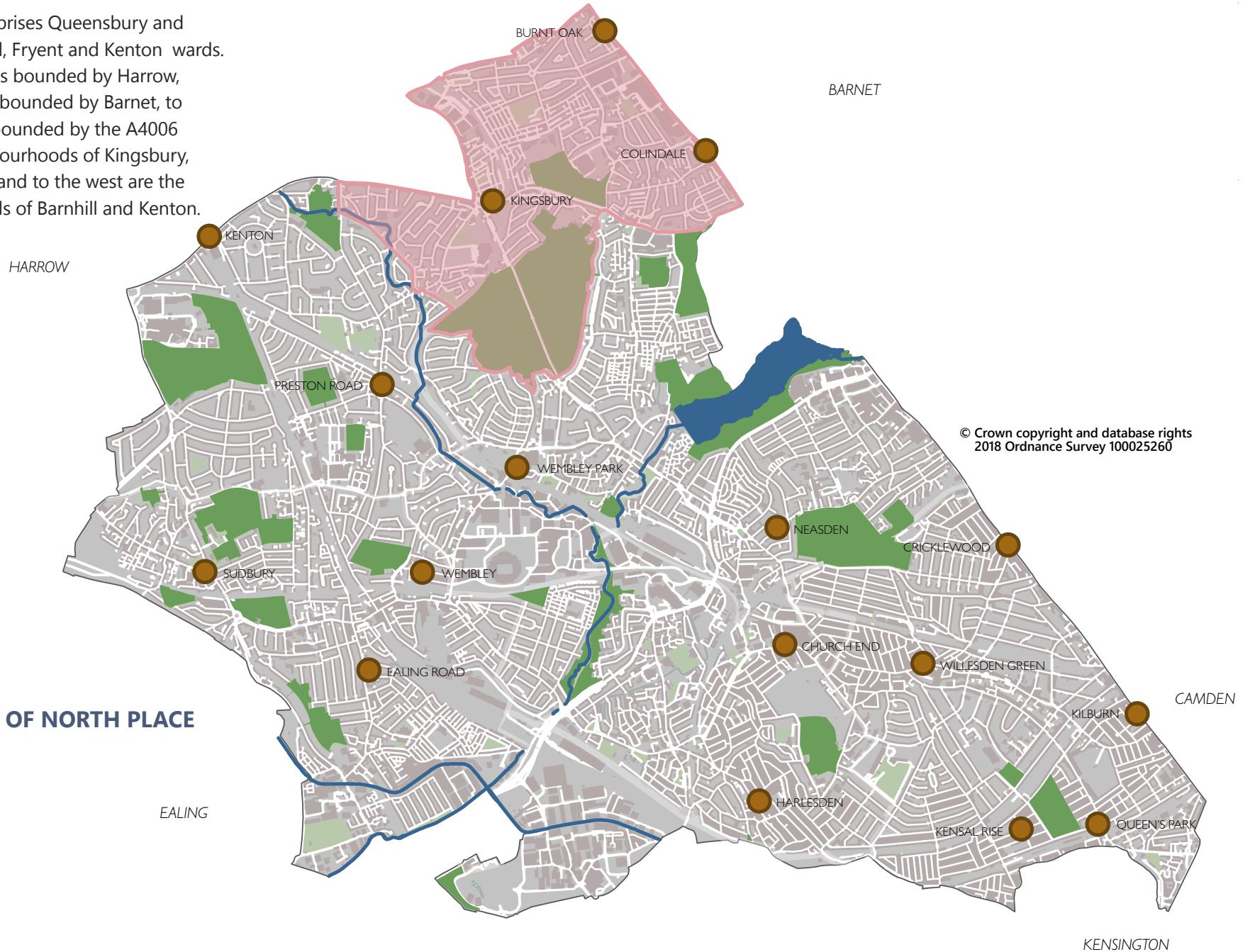
REF.	ADDRESS	SIZE (HA)	EXISTING USE	PERMISSION USES	INDICATIVE HOMES	COMMENTS
17/3698	39 Waterloo Road NW2 7TT		Offices	Residential	11	Prior Approval
16/2171	Press House, Press Road, NW10 0DW		Residential	Residential	74 (gross) 33 net	On site
16/4010	Warranty House, Dudden Hill Lane, NW10 1DD		Offices/ derelict land	Residential	136	
18/1446	Jubilee House, Townsend Lane, NW9 8TZ		Offices	Residential	12	Prior Approval
15/2891	Albion House, 470 Church Lane, London, NW9 8UA		Offices	Residential	17	Prior Approval
13/2453	1 Barons Court		Residential	Residential	26	

## 5.3 NORTH



## NORTH

**5.3.1** This place comprises Queensbury and parts of Barnhill, Fryent and Kenton wards. To the north it is bounded by Harrow, to the east it is bounded by Barnet, to the south it is bounded by the A4006 and the neighbourhoods of Kingsbury, Wembley Park and to the west are the neighbourhoods of Barnhill and Kenton.



**FIGURE 15 MAP OF NORTH PLACE**



## CHARACTER AND CULTURE

- 5.3.2** This place is largely suburban in character, comprising of neighbourhoods focused around town centres, tube stations and locally significant industrial sites.
- 5.3.3** There are two main character areas located within this place:
- a)** Kingsbury, a mainly residential area which has a mixture of suburban and 'metro-land' characteristics. Houses are predominately 2-3 storeys, set in large plots. This character area contains a number of homes by the architect Ernest Trobridge in the 1920s and 1930s, ranging from thatched cottages to flats/ houses which distinctive castle features and crosses.
  - b)** The A5 corridor character area consists of Burnt Oak and Colindale town centres and surrounding residential areas. A number of the buildings date back to the 1930s period, where rapid expansion occurred as a result of the opening of tube stations in the surrounding areas. Arguably, the main feature of this area is the A5. This is a straight road which provides a direct link into Central London. It has historical significance as part of the Old Watling Road, one of the principal Roman roads in Britain.
- 5.3.4** There are two conservation areas within this place:
- a)** Roe Green, where the design of the building, street setting and street scenes should be viewed in the context of the Garden City movement.
  - c)** Buck Lane, which includes part of seven roads whose design, grouping and setting of the buildings create a special character area. The built form and hilltop location results in impressive views, some privately enjoyed, which add to the character of the area. In addition high quality architecture creates an enclave of attractive and distinctive character within an area of otherwise everyday suburban landscape.
- 5.3.5** There are 6 areas of archaeological importance within this place, two of which are located within the boundaries of Fryent Country Park. .
- 5.3.6** The most significant open space within this place is Fryent Country Park, the borough's only Metropolitan Park. There are smaller open spaces scattered throughout, such as Eton Grove Open Space, Grove Park and Roe Green Park.
- 5.3.7** There are a number of listed and locally listed buildings within this place. These include the Grade II listed Kingsbury Manor, a number of houses along Slough Lane, of which two were lived in by architect Ernest Trobridge and 3-5 Buck Lane, which were built as part of the Summit Estate by H.J. Aldous.

## EMPLOYMENT AND EDUCATION

- 5.3.8** Located within this place is two locally significant industrial sites (LSIS), Colindale and Honeypot Lane (east and west) and one local employment area, Kingsbury Road. The quality of these employment sites varies. They are well occupied, but as with most industrial locations within the borough have not been subject to significant investment in the recent past; have variable public realm and quality and accessibility to the strategic road network. In some cases they have a relatively high representation of non-industrial uses are pockets close to residential properties.
- 5.3.9** Similar to the North West, employment within this place is concentrated within the public administration, education and health sectors, which account for half of employment. In general, the northern region of the borough accounts for a quarter of all micro businesses, and has the joint highest level of self-employment in Brent. The Burnt Oak/ Colindale area, including the town centre and the neighbouring locally significant industrial site, has the highest concentration of the employees.

## TRANSPORT

- 5.3.10** The predominant PTAL level within this place is 2. There are large areas within this ward which have a lower PTAL rating than the average; the central region of the Queensbury Ward has a PTAL rating of 1a-1b, and a large part of Fryent Country Metropolitan Park has a PTAL rating of 0.
- 5.3.11** Areas which achieve a higher PTAL rating are those with closer proximity to tube stations. Kingsbury and Queensbury stations are in this place and served by the Jubilee Line, which is now part of the night tube Burnt Oak and Colindale are northern line stations in Barnet and are 0.5 miles from their respective town centres.
- 5.3.12** There are three major roads within this place; A5 Edgware Road, A4006 Kingsbury and Kenton Roads and A4140 Fryent Way and Honeypot Lane. All three roads are located within an air quality management area. Within the Burnt Oak/Colindale area, the A5 acts as a barrier to east-west movement.
- 5.3.13** The Capital Ring Walk, a strategic walking route through London's parks, passes through Fryent Country Park, and continues in an easterly direction towards Welsh Harp Open Space. The existing significant cycling infrastructure within this place, includes an on-road cycling route along the A5 and Fryent Way, and an off road cycling route which passes through Roe Green Park.

## TOWN CENTRES

- 5.3.14** There are three town centres within this place; Burnt Oak, Colindale and Kingsbury. All are classified as district centres.
- 5.3.15** Burnt Oak town centre is within the boundary of the Burnt Oak and Colindale Growth Area. It also falls within the administrative areas of Barnet and Harrow. Brent’s portion of the centre is the smallest, containing 35 commercial premises including Peacocks, whilst the majority are services. Vacancy rates are one of the highest of all Brent’s town centres.
- 5.3.16** Colindale town centre falls within Brent and Barnet. This centre has the highest proportion of all Brent’s town centres in services (63% of all units). The vacancy rate of 7% is similar to the Brent average. Out of the town centre to the north there are larger convenience and comparisons stores including an ASDA superstore, Colindale Retail Park and shops within the Oriental City and Capitol Way developments.
- 5.3.17** Currently, both Burnt Oak and Colindale struggle with their identity. There is no clear boundary identifying their start and end. The environment is dominated by vehicle movement, reflective of its history as one of London’s main routes north. This, together with poor public realm and clutter has a detrimental impact on ‘dwell times’ and active travel uptake.
- 5.3.18** Kingsbury town centre in part also falls within Harrow. The centre has one of the highest proportion of convenience stores and lowest vacancy rates in Brent. Key draws within Brent’s section include Tesco Express, Aldi and the Kingsbury Underground station.

CHALLENGES	OPPORTUNITIES
<ul style="list-style-type: none"> <li>• Burnt Oak and Colindale/The Hyde have poor quality public realm and is vehicle dominated. As a result, east to west across the town centre is impeded.</li> <li>• Burnt Oak, Colindale and Kingsbury town centres straddle two or more borough boundaries.</li> <li>• Cycling uptake within the borough’s north is much lower than in the south</li> <li>• Some of the LSIS sites are either in poor condition, have poor quality of environment and public realm or have poor access to the strategic road network.</li> <li>• The level of deprivation varies significantly, ranging from an IMD decile score of 2 to 6.</li> <li>• The highest level of fuel poverty is located around Kingsbury Town Centre.</li> <li>• The quality of open space within this area is not greater than ‘fair’; a number of parks are ‘poor’ quality.</li> <li>• SINC sites’ quality within this place varies significantly.</li> <li>• In comparison to other centres, Colindale is less accessible. Colindale Station is over a 20 minute walk away.</li> <li>• Poor air quality is focused around the major roads – the A5, Fryent Way and A4006. All of which are located within an air quality management area.</li> </ul>	<ul style="list-style-type: none"> <li>• Support and enhance the role and function of Kingsbury town centre as an ethnic/ specialist food shopping destination</li> <li>• Developing the offer at Burnt Oak and Colindale town centres to appeal to existing residents, and future Growth Area occupants.</li> <li>• Intensification of locally significant industrial sites to support economic growth and achieve the London Plan targets</li> <li>• Continued housing delivery within Burnt Oak and Colindale Growth Area, with the possibility of increasing development potential through reviewing its boundaries.</li> <li>• Establish and develop identities for Burnt Oak and Colindale/The Hyde to: <ul style="list-style-type: none"> <li>• Support their role as priority town centres</li> <li>• Strengthen and develop their local economy</li> <li>• Support the conservation and enhancement of heritage assets within Burnt Oak Town Centre. This includes restoring the Savoy cinema, through its re-use.</li> </ul> </li> <li>• Improvements to the public realm and streetscape along the A5 corridor including planting more trees, with a focus on the town centres to not only enhance aesthetics, air quality, reduce urban heat island and encourage active travel.</li> <li>• Improving the efficiency of movement along the A5 corridor to reduce environmental impacts of congestion impacts, to include targeted bus measures, improving east to west links.</li> <li>• Improvements to the quality of open spaces and sports facilities, for example at Leybourne Road and Abbey National Open Spaces</li> <li>• Additional homes within town centres and along main road intensification corridors with relatively good access to public transport.</li> </ul>

FIGURE 16 HIGH LEVEL PLAN OF THE PLACE



## VISION

- 5.3.19** The Burnt Oak and Colindale Growth Area as part of the wider Opportunity Area will develop into a mixed, pleasant and accessible district centred along a strategic transport corridor. It will be made up of a series of distinctive, characterful places which build upon the existing strengths of the area. It will contain a range of facilities and infrastructure serving both existing and future occupiers and visitors to the area, located along a coherent and pleasant high street (the A5 Edgware Road).
- 5.3.20** Colindale and Burnt Oak Town Centres will continue to serve existing and new, residents of the Burnt Oak Growth Area and surrounding areas, through providing a good range of shops, community and leisure uses. Both centres will have high quality public realm, reducing vehicle dominance on the townscape, and have developed an identity which reflects their unique character. Kingsbury Town Centre will become a destination for ethnic/specialist food shopping and will continue to be a popular evening economy destination.
- 5.3.21** Intensification and co-location within the locally significant industrial sites in this place will create employment space that meets 21st century needs and continue to provide good local employment opportunities.
- 5.3.22** Outside of the Growth Areas and key site allocations it is not likely that significant change will occur. This is as a result of the place's low PTAL levels and limited land availability. It is possible that new development could come forward along intensification corridors and within Kingsbury and Colindale town centres which will be classified as tall buildings. These however, will be more reflective of the suburban character in terms of scale, being no more than typically 5-6 storeys in height. Other in-fill development will respect its context in terms of height and character.

## PREFERRED POLICY OPTION: BP3 NORTH

**Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:**

## CHARACTER, HERITAGE AND DESIGN

**Maintain and enhance local character and distinctiveness by:**

- a. Continuing to conserve and enhance designated heritage assets within this area**
- b. Respecting the predominantly suburban low rise character of the area.**

**Tall buildings of 24 metres or more will be limited to the Burnt Oak and Colindale Growth Areas, in town centres and intensification corridors between 15-18 metres (5-6 storeys) could be appropriate. In these areas development should be stepped down to form a comfortable relationship with adjacent areas.**

- c. Protecting, and where possible, enhancing the setting and quality of homes designed by Ernest Trobridge.**

## HOMES

- d. Continued residential development within the Burnt Oak and Colindale Growth Area. The potential residential development for the extension of the Burnt Oak and Colindale Growth Area, referred to as Capitol Valley, will be determined by a masterplan, taking into account to need to intensify employment use on the site.**
- e. Co-location on Honeypot Lane LSIS**
- f. Redevelopment of the Morrisons site to maximise land use efficiency**
- g. Residential development within various locations at Kingsbury town centre to support its vitality and viability**
- h. Intensification corridors of A5 Edgware Road, A4006 Kingsbury and Kenton Roads and A4140 Fryent Way and Honeypot Lane – the development capacity of these areas is unknown. Residential development coming forward is dependent on whether conversions/ extensions or redevelopment of existing buildings come forward.**

## TOWN CENTRES

- i. Pursue opportunities to enhance the role and function of Kingsbury as an ethnic/ specialist food shopping destination.**
- j. Establish clear identities for the Colindale and Burnt Oak through implementing public realm, building upgrades and shop facades improvements.**
- k. Provide up to 4,400sq.m of net comparison goods floorspace, up to 3,600 sqm of net convenience foods floorspace, up to 500 sqm class A3 floorspace and 200sqm class A4 floorspace by 2028. This floorspace should be directed towards the three town centres.**
- l. Additional residential on upper floors or making efficient use of plots within Kingsbury, Burnt Oak and Colindale town centres will be supported to increase local population catchments**

## COMMUNITY AND CULTURAL FACILITIES

- m. **Secure sufficient physical and social infrastructure on and off site to support an increase in population at Burnt Oak and Colindale**
- n. **Explore opportunities for additional secondary school provision within this place**
- o. **Identify opportunities to potentially meet the need for a new leisure facility that incorporates swimming pool provision**
- p. **Improve the quality of strategic hall sites within this place**

## EMPLOYMENT AND SKILLS

### Supporting the local economy by:

- q. **Encouraging the co-location redevelopment of Honeypot Lane LSIS to create a wide range of additional new business premises fit for modern day occupiers**
- r. **Supporting transformational change at Colindale LSIS to provide intensification and the creation of a new mixed use community**
- s. **Supporting new and improved employment premises as part of a wider site development with Morrisons at Honeypot Lane (Lowther Road)**

## OPEN SPACE AND BIODIVERSITY

### Maintaining and enhancing the quality of public parks, open spaces and biodiversity areas through:

- t. **Enhancements to Leybourne Road Open Space and Abbey National Open Space**
- u. **Pursue opportunities to improve the Capital Ring**
- v. **Tree planting and associated landscaping around the A5 corridor**
- w. **Improve the quality of the borough's SINC sites within the area, in line with the recommendations included in SINC Review.**
- x. **Creating at least 3 new public open spaces and squares of at least 0.2 hectares each within the Burnt Oak and Colindale Growth Area**

## TRANSPORT

- y. **Reduce the traffic dominance and enhance the A5 corridor through implementing public realm improvements to achieve Healthy Street Standards**

- z. **Support the delivery of creating new cycling links between key destinations within this area, such as open spaces, tube stations and employment sites**

## CHARACTER, HERITAGE AND DESIGN

**5.3.23** The area as a whole is typically two storey, low density and suburban in character. There are exceptions to this. The significant ones are new development in the Burnt Oak and Colindale Growth Area which has some tall buildings and the area within and adjoining Queensbury LSIS which has buildings of three to five storeys. It is anticipated that that the Growth Area will continue to be an area where tall buildings will be delivered.

**5.3.24** Within this area, there are two conservation areas; Roe Green and Buck Lane. Roe Green, Brent's first conservation area, was identified for its special character with regards to building design, street scene and street setting. The area, which contains design elements that can be associated within the Garden City movement, has a distinct village feel. Buck Lane has been designated as a conservation area due to it displaying a range of buildings designed by Ernest Trobridge.

**5.3.25** Tall buildings will not be in character within the majority of areas in this place. Opportunities for buildings above 6 storeys will be limited to the Burnt Oak and Colindale Growth area. Opportunities for taller buildings (5-6 storeys) may be considered to be appropriate to support the intensification and co-location of employment uses at the Queensbury LSIS and Morrisons sites. The same is true within the town centres and along the intensification corridors of the A4006 Kingsbury and Kenton Roads and A4140 Fryent Way and Honeypot Lane.

## HOMES

**5.3.26** The Burnt Oak and Colindale Growth area has previously been identified as having the capacity to deliver 2,500 homes over a 15-year period. Over one third of these homes have been delivered to date. The council has reviewed this Growth Area and have identified new sites and boundary amendments to support additional residential and employment development. This development will further contribute to the creation of a mixed, vital and accessible district. Masterplanning exercises will be undertaken for key sites within the Growth Area to determine the appropriate mix of uses, form of development, infrastructure requirements and density of development.

**5.3.27** The Capitol Valley site within the Burnt Oak and Colindale Growth Area contains

area of land designated as LSIS. Redevelopment of the site, which will be in accordance with an approved Masterplan, will need to address the requirement to intensify employment uses too. In advance of the adoption of a masterplan for this site, the council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.

- 5.3.28** The Queensbury LSIS together with the Morrisons superstore site provides the opportunity to maximise the efficiency of currently underutilised land. Mixed-use redevelopment will also support intensification of employment space on the LSIS in accordance with the borough's London Plan 'provide capacity' status through co-location with other uses. In addition it increases the potential to improve the quality of the public realm along Honeypot Lane and Cumberland Road. A masterplanning exercise will be undertaken for this site to determine the approximate mix of uses to achieve an increase in employment floorspace and retention of a food store whilst providing a significant number of new homes and any required associated infrastructure.
- 5.3.29** Elsewhere, the opportunity to provide homes is likely to be within the boundary of Kingsbury Town Centre. Delivery of homes within this centre will help to support its vitality and viability. There are also opportunities to provide additional homes along the intensification corridors, either through redevelopment or as small scale infill/ redevelopment/ extensions and conversions.

## TOWN CENTRES

- 5.3.30** Burnt Oak and Colindale district centres will continue to support the growing population of the Burnt Oak and Colindale Growth Area, providing residents, both existing and new, with a range of good local shops.
- 5.3.31** To help establish a clear identity for both town centres, the council will adopt to the following guiding principles:
- Improving the quality of the public realm to enhance walking and cycling access to the centres, and seek to increase 'dwell time'
  - Improve accessibility across the A5 for pedestrians
  - Encourage decluttering of streetscape to promote 'visual good manners'
  - Where appropriate, promote building upgrades and improvements to the shop fronts and facades
  - Enhancing "forgotten" heritage assets
  - Reducing vehicle dominance within the centres, and the impact that they have on the streetscape

- 5.3.32** Burnt Oak Town and Colindale town centres boundaries are across two or more boroughs. The council will seek to adopt a co-ordinated approach to these centres. To support Brent's diversity, a number of the borough's centres play an important role in destinations for specialist ethnic and world food and non-food shopping. The council's Retail and Leisure Needs Study identifies that the ethnic/ specialist food shops within Kingsbury make an important contribution to the centres vitality and viability. Protection and enhancement of this role within Kingsbury Town Centre will be encouraged. There is limited need for additional food and drink establishments within this place. Due to the presence of three supermarkets it is not currently considered necessary to plan for any more.

## COMMUNITY AND CULTURAL FACILITIES

- 5.3.33** As identified in the council's 'Indoor Sports and Leisure Facilities Needs Assessment' this place has a number of sports halls identified as 'strategic' in ensuring the borough's demand is met. Some require improvement to see an increase in their capacity.
- 5.3.34** The north currently has poor access to main swimming pools. The council will consider the need for a new leisure facility within this place, taking into consideration an up-to-date analysis of demand.
- 5.3.35** The former Savoy Cinema premises at 1 Burnt Oak Broadway is a Grade II listed building. Given the nature of the site, the council considers its most appropriate use is likely to be for community or leisure, but other uses compatible with its listed status will be considered. This will bring the building back into use without impacting its integrity or special interest.
- 5.3.36** Further additional community and cultural facilities for this place will be identified through the masterplanning process that is being adopted for the three key site allocations.

## EMPLOYMENT AND SKILLS

- 5.3.37** There are three areas of locally significant industrial sites (LSIS) within this place. All are incorporated into site allocations. The redevelopment of these sites is expected to intensify employment floorspace and ensure long term safeguarding for employment uses. Providing the incentive to create these premises is only considered possible with cross-subsidy from other more lucrative uses, such as residential. The mixture of uses will require careful management to ensure that development is successful, and create the

environments and conditions to satisfy both the resident population and businesses. Brent Employment Land Demand Study identified a number of poor performing criteria for each site. A number of these, such as poor quality public realm, condition of buildings, and inadequate parking and servicing, could be addressed through re-development.

## GREEN INFRASTRUCTURE AND OPEN SPACES

- 5.3.38** This place has reasonably good access to a range of public park typologies. The urban nature and limited land availability means it is important to ensure that the quality of existing open spaces are maintained, and where possible enhanced. Securing additional open space is only likely to be possible on larger scale development sites. Through adopting a masterplanning approach to large scale sites, open space requirements can be considered from the outset and contribute to a development achieving the appropriate urban greening factor.
- 5.1.39** The council will pursue opportunities to improve the Capital Ring within this place.

## TRANSPORT

- 5.3.40** The projected growth in population, particularly within the Burnt Oak and Colindale Growth Area, will place additional pressure on the existing road network. To reduce such pressure, the council is looking to promote active and sustainable travel over private vehicle use within this place.
- 5.3.41** The A5, which forms the eastern boundary of this place, provides a link to central London and areas beyond the London to the midlands and north. The road is heavily trafficked and creates a vehicle dominated landscape within this area. Reducing this dominance and creating an attractive environment which is designed to the healthy street standards, will help to encourage the uptake of active travel modes.
- 5.3.42** Improving the existing cycling infrastructure within this area can help to alleviate pressure on the road network. Extensions to the off-road and on-road cycling network to key destinations within this place, such as Fryent Country Park and locally significant industrial sites, will be promoted within this place.

## KEY SITE ALLOCATIONS

Capitol Way Valley

Colindale Retail Park, Southon House and Trust Ford Garage



Queensbury LSIS and Morrisons

## OTHER POLICY GUIDANCE

- Burnt Oak, Colindale and The Hyde Placemaking Plan
- Masterplans for Capitol Way Valley, Colindale Retail Park and Queensbury LSIS

## BNSA1 CAPITOL WAY VALLEY



Site Boundary

Existing Use	Locally significant industrial site containing a range of uses, such as car repairs, car show rooms, warehouses and distribution parks. A large retail superstore in the south eastern corner of the site, and a petrol station and MOT shop and large car dealership with associated car parking/storage in the north eastern corner.		
Allocated Use	Mixed-use development comprising areas of employment intensification and co-location with other uses, retention of superstore of same size, or less, residential development and any associated required social infrastructure.		
Indicative Capacity	A future masterplanning process will provide clarity.		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	300	114	786
Address	Edgware Road NW9 0AS Capitol Industrial Park, Capitol Way, NW9 0EQ		
Area	12.61 hectares		



Description of Existing Site	<p><b>Capitol Way Locally Significant Industrial Land</b> – The LSIS consists of a number of industrial units that are generally no taller than two storeys in height. The majority of units which form the LSIS are small, with only a small number of larger units. The majority of these larger units are located within western region of the LSIS. Located within the eastern region of the LSIS is a car dealership and associated parking/storage land. A petrol station forms the north western corner of the LSIS.</p> <p><b>ASDA Superstore</b> - Located in the south eastern corner of the site is one large superstore (ASDA) with a two-storey car park at the rear.</p> <p>To the south of the site is Grove Park, social infrastructure (health centre, place of worship), residential development and the Former Oriental City Development. To the west of the development is Stag Lane and residential development which is predominantly two storey in character. To the North of the site residential development along Homstall Avenue and to the east is the A5 and new flatted residential development known as TNQ.</p>
Ownership	Private Sector
Relevant Planning History	<p>The <b>ASDA superstore</b> formed part of the previous Site Specific Allocation BC/1 in 2011. The allocation, which included the former Oriental City site, was identified for mixed use development which included residential, retail, food and drink, community facilities and leisure and the re-provision of Chinese and Far-Eastern commercial and community floorspace.</p> <p>Within the <b>Capitol Way LSIS</b>, permission (17/0837) has been granted subject to signing of a S106 planning obligation for the “Demolition of the existing buildings and redevelopment of the site to provide six buildings ranging between four to nine storeys and eight three storey mews houses, and the erection of a two storey commercial building, providing a total of 4,051m of flexible commercial floorspace across the site and 414 residential units” at 1-8 Capitol Way.</p>
PTAL Rating	The PTAL rating of the site ranges from 1b-3.
Planning Considerations	<p>The site is included within the amended boundary of the Burnt Oak and Colindale Growth Area which has the potential to accommodate significant growth. A significant portion of the site is Locally Significant Industrial Land. The whole site will be subject to a masterplan process to comprehensively identify how the area can increase useable employment floorspace, whilst contributing to the council’s vision for the Burnt Oak and Colindale area of creating “a mixed, vital, accessible and pleasant district”. Until a master plan for the site has been agreed/adopted by the council, no redevelopments (apart from 17/0837) will be permitted within this area.</p> <p>To the east of the site in Barnet is the Burnt Oak and Colindale Opportunity Area, which the regeneration and growth programme to deliver of 10,000 new homes, a new neighbourhood centre and improved public transport services. The masterplanning process for this site should take into consideration the growth adjoining, and seek to ensure that development contributes to creating a shared sense of townscape/landscape.</p> <p>Located in the south eastern corner of the site is a large retail superstore. The retail superstore is within an ‘out-of-town centre’ location. The store is well established and trading well. No alternative sites have been identified that could accommodate it in nearby Brent town centres. As such its retention is sought, although an increase in floorspace is not. Any additional retail floorspace will be subject to Sequential Test and impact assessment.</p> <p>The site currently contributes little to the frontage along Edgware Road. Any proposed development address this through creating an active frontage along its length.</p> <p>The site is located on an historical industrial site. A Preliminary Contamination Risk Assessment will be required, and if necessary remediation. Furthermore, the areas of the site which directly adjoin the A5 are located within an Air Quality Management Area. As such, development at this site should at least be air quality neutral, with a desire to achieve air quality positive. Noise associated with the adjoining roads and continued industrial/employment uses on site will need to be addressed in the design of the development.</p> <p>There is some potential for tall buildings, subject to stepping down towards the surrounding residential areas. The appropriate height, extent and location of buildings will be identified within a masterplan for the site.</p> <p>The site is in close proximity to Grove Park, a local park which also contains Grade II SINC site. The impacts of development on the integrity of the SINC through increased patronage of the park will need to be considered and if necessary appropriate mitigation provided.</p> <p>None of the site is within Flood Zone 3 for fluvial flooding, however there are parts within zone 3 for surface water. These are principally, although not exclusively, within highway land. The site is located within an area which is susceptible to groundwater flooding.</p> <p>Edgware Road, which adjoins the site to the east, is relatively busy. The site is in an area of low PTAL and is located approximately a 12 minute walk from Colindale Tube Station. Development proposals will need to consider the impact that additional cars may have on the road, and the surrounding road network.</p> <p>Due to a relatively low PTAL score, some car parking spaces to serve the development are likely to be required. These should be designed to ensure that they do not have a detrimental impact on the streetscape of the development.</p> <p>There is a bus stop which serves the site.</p>

Risks	<p>Fragmented nature of landownership could increase time taken to deliver. Furthermore, this landownership could result in a piecemeal, rather than a comprehensive approach to redevelopment of the site, which could create a disjointed environment and inadequate provision on infrastructure.</p> <p>Potential for a lack of co-ordination with London Borough of Barnet related to the cumulative impacts of the Burnt Oak/ Colindale Opportunity Area.</p>
Design Principles	<p>To be fully drawn out in any future masterplans. Key points to address include:</p> <p>Ensuring successful co-location/ intensification to allow the area to successfully retain, and enhance, its employment function. Factors to be considered include dedicated parking and services facilities.</p> <p>Tall buildings on this site should respond to the height of the surrounding residential character and ensure that there is a stepping down towards 2-storey character to the north, west and part of the east.</p> <p>Providing high quality public realm, which improves pedestrian and cycle movement and complements the work being undertaken in the Burnt Oak/ Colindale Opportunity Area.</p> <p>Access to the site to be considered carefully to ensure no conflict is created between different users</p> <p>Interface between residential and industrial uses</p> <p>Improving access to Grove Park, whilst ensuring the current green and open space on the site is maintained and enhanced. Additional green infrastructure is likely to be required to support development on site.</p> <p>Creating an active frontage around the sites edges along streets and in particular along the Edgware Road frontage</p> <p>Provide tree planting along the Edgware Road frontage to address air quality/ Healthy Streets agenda</p> <p>The masterplan for the site will also need to take into the consideration the 'Burnt Oak and Colindale Placemaking Plan'.</p>
Infrastructure Requirements	<p>Due to the low PTAL score of the site, some car parking will need to be provided. Retention and enhancement of undesignated existing green space and additional green infrastructure should be incorporated. Improvements to the public realm. Increased traffic at site could require some junction improvements, which will need to be determined through a transport assessment. Social and physical infrastructure requirements to be fully drawn out in future masterplan work on the site.</p>
Justification	<p>This site incorporates land within the Burnt Oak and Colindale Growth Area, and land which adjoins it. This area has previously been identified as a suitable location to accommodate growth, as well as providing an opportunity to boost business and employment opportunities within the borough. Furthermore, the intensification/co-location of the LSIS 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. The LSIS also has good access to services and amenities which will support intensification/ co-location.</p>

## BNSA2: COLINDALE RETAIL PARK, MULTI-STOREY CAR PARK AND SOUTHON HOUSE



Site Boundary


Existing Use	Mixture of uses, including Colindale Retail Park which consists of 6 commercial units and associated car parking, a multi-storey car park with car showroom on bottom floor, Southon House, which contains office floorspace, and a large car dealership forming the southern region of the site.		
Allocated Use	Mixed use development to include residential, retail and employment space.		
Indicative Capacity	To be determined by a masterplanning process – estimated at this stage 500 dwellings		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	200	300



Address	Colindale Retail Park and Edgware Road
Size	4.02ha
Description of Existing Site	<p>The multi-storey car park is approximately 5 storeys in height and contains a car showroom on the ground floor. In front of the multi-storey car park, adjoining is a small area of hard and soft landscaping, which is being used to store cars associated with the dealership.</p> <p>Southon House, an office block which forms the sites south eastern corner, is approximately 6 storeys in height. There is an area of green space which sets the building back from the A5 road, which it adjoins to the east.</p> <p>Set back from the A5 is Colindale Retail Park, which consists of six retail units, which are in a horseshoe configuration and associated car parking. The retail units are two storeys in height, and are large and bulky in form.</p> <p>Forming the southern region of the site is a car dealership and associated car parking. There are a number of structures located on this site, which are no taller than 3 storeys in height. The site is set back from the A5 by areas of green space and hardstanding that is being used to display cars. There is also an area of hardstanding to the west of the main building which is used as a staff car park. There is variation in site levels; decreasing from west to east.</p> <p>To the north of the site is Sarena House and Allied Manufacture, which has been granted planning permission for the erection of 2-6 storey residential buildings and affordable workspace for research and development. To the east of the site is the A5, a 7-16 storey residential building and fast food outlet. To the south of the site is Colindale Town Centre, and to the west is residential development, where the predominant character is 2-storey terraced.</p>
Ownership	Private Ownership
Relevant Planning History	<p>Some of the site formed part of the previous Site Specific Allocation B/C2. The allocation, which also include Sarena House, was identified for <i>“Mixed used development to include residential and workspace, a proportion of which to be managed affordable workspace”</i></p> <p>Sarena House which adjoins the site to the north has been granted planning permission for 227 residential dwellings and 256 sqm of affordable workspace (14/2930) which is nearly complete.</p>
PTAL Rating	The PTAL rating of the site varies from 2-3. The majority of the northern and southern region is within PTAL rating 2, with the central region achieving PTAL rating 3.
Planning Considerations	<p>The site is located within the boundary of the Burnt Oak and Colindale Growth Area, which has been identified by the council as an area which has the capacity to accommodate significant growth. Due to the site's location within a transformational area, there is some potential for tall buildings, subject to stepping own towards the 2-storey character to the west of the site, and 2 to 3-storey character to the south east of the site.</p> <p>The site currently has a poor quality frontage along Edgware Road, with most buildings set back from historic building lines. The council has a desire to creative active frontage between the two centres of Burnt Oak and Colindale. Redevelopment at this site should ensure that this is achieved.</p> <p>There are a number of trees fronting onto Edgware Road and along Hay Lane. Where possible, these trees should be retained and additional trees provided.</p> <p>The site is located within an Air Quality Management Area. As such development at this site should be at least air quality neutral, with the aim of achieving air quality positive status. Due to the site's location on a historic industrial site there is risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. Potential noise associated with the adjoining road will have to be addressed in the design of the development.</p> <p>The site adjoins the A5, with access to the retail park via a signalised junction. Access to the large car showroom is via Hay Lane. Due to the relatively low PTAL levels across this site, some car parking facilities will need to be provided. The council will encourage the use of lower parking provision, in line with London policy.</p> <p>The site allocation seeks to introduce a residential element to this site, whilst retaining its commercial and retail elements. To understand the likely impacts that this will have on local road networks, a transport assessment for this site will be required. This assessment should inform any improvements that may be needed to support the redevelopment of this site.</p> <p>The site is in close proximity to Beis Yaakov Primary School and Nursery, which are a locally listed building. Development at this site should avoid having a detrimental impact on the setting of this building.</p> <p>The site is located within an area which is susceptible to groundwater flooding. There are also small areas within the site which are susceptible to surface water flooding. The majority of the site is located within an area which is susceptible to sewer flooding. A flood risk assessment will need to address how development satisfactorily addresses these matters.</p> <p>There are some variation in the site levels, especially within the southern part, which will need to be taken into consideration, particularly when considering heights for development.</p>

Risks	<p>Multiple land ownership at this site could increase time taken to deliver. Furthermore, landownership could result in piecemeal development coming forward, rather than comprehensive approach to the redevelopment of the site.</p> <p>Impact on the A5, and A5150 intersection as a result of introducing residential development at this site</p> <p>Potential for lack of co-ordination with London Borough of Barnet related to the cumulative impacts of the Burnt Oak/ Colindale Opportunity Area.</p>
Design Principles	<p>To be fully drawn out in any future masterplans. Key design principles for this site include:</p> <p>Residential development along Evelyn Avenue, which adjoins the site to the west, is predominantly two-storeys in character. The western edge of the development should respond to the suburban nature of this area by ensuring there is a step down in height.</p> <p>Layout of the site should improve permeability, and ensure that there are links to the footpaths created as part of the adjoining Sarena House development.</p> <p>Enhancing, and creating active frontage along Edgware Road between Burnt Oak and Colindale Town Centres.</p> <p>Provide tree planting along the Edgware Road frontage to address air quality/ Healthy Streets agenda.</p> <p>Provision of higher quality public realm, which improves pedestrian and cycle movement, and complements the work being undertaken in adjoining Colindale Growth Area</p> <p>Development at this site will need to take into consideration the 'Burnt Oak and Colindale Placemaking Plan'.</p>
Infrastructure Requirements	<p>Increased traffic at site as result of residential development may require the current vehicular access to be reconsidered.</p> <p>Due to relatively low PTAL rating of this site, some car parking facilities may be required, in addition to installation and/or enhancements to</p>
Justification	<p>The site is located within the Burnt Oak and Colindale Growth Area, which has previously been identified as a suitable location to accommodate additional homes within the borough. Furthermore, the site is currently underutilised and mixed use development at this site would be a more efficient use of land.</p>

## BNSA3: QUEENSBURY LSIS AND MORRISONS


<p>Site Plan</p>			
<p>Existing Use</p>	<p>Locally Significant Industrial Sited located in the northern and southern regions of the site, with a large retail superstore and associated car parking facilities occupying the central region.</p>		
<p>Allocated Use</p>	<p>Mixed used development – intensification at Honey Pot Lane LSIS, co-location at Lowther Lane Honey Pot Lane LSIS. Redevelopment of the superstore site at Honey Pot Lane, to include residential and retail floorspace.</p>		
<p>Indicative Capacity</p>	<p>To be determined through masterplanning process. Indicative capacity at this stage of 383 dwellings</p>		
<p>Timeframe for Delivery</p>	<p>0-5 years</p>	<p>5-10 years</p>	<p>10+ years</p>
		<p>190</p>	<p>193</p>
<p>Address</p>	<p>Honey Pot Lane, NW9</p>		

Area	8.24 hectares
Description of Existing Site	<p>There are three main areas which form this site allocation</p> <p>Honeypot Lane LSIS (Westmoreland Road) - Consists of a number of industrial units that range in size and are predominantly two storey surrounded by poor quality public realm.</p> <p>Morrisons Superstore - a single storey large supermarket and petrol station, with extensive surface car parking.</p> <p>Honeypot Lane LSIS (Lowther Road) – the majority of the western portion of this LSIS site consists of two large units (BandQ and Selco) and associated car parking/storage areas. The buildings take the form of warehouses, which are at least 8 metres tall. To the north and east in the site are smaller units, predominantly two storeys in height.</p> <p>To the north of the site is residential development located within Harrow’s boundary, and the Jubilee Line borders the site to the east.</p> <p>To the west of the site is Honeypot Lane, and suburban residential properties within the adjacent London Borough of Harrow, and to south is the NHS Trust Kingswood Centre, the White Garden SINC site and residential and commercial development.</p>
Ownership	Private
Planning History	<p>The Morrisons supermarket was previously identified as a site allocation (SSA 16) for “Use of north and eastern section of car park for residential development including family sized accommodation. Alternatively a mixed use development including residential and retail floor space”.</p> <p>Planning permission has been granted for “Demolition of existing single storey temple building and erection of a new 5 storey temple with a shikhar (tower), basement level for storage and plant equipment, ancillary library and educational use, priest accommodation, and a function room’ at 6 Bowman’s Trading Estate</p> <p>Planning application submitted for car park north east of Morrisons for “Erection of three buildings at 4,5 and 7 storeys providing 194 residential units, 60 car parking spaces, private and communal landscaped amenity areas, landscaped podium deck, secure cycle parking, recycling and refuse stores, access improvement and other associated developments”.</p>
PTAL Rating	The majority of the site is located within PTAL rating 3, with the Westmoreland Road LSIS within either PTAL 2 or PTAL 1a.
Planning Considerations	<p>The Morrisons is in an out of centre location and trading well. There are no sequentially preferable locations available in Brent’s town centres locally that could accommodate the store. Therefore a retention of a supermarket of similar size on site would be sought. As an out of centre site, sequentially it is not the preferred location for additional retail space/ town centre uses. Any such additional space will need to pass the sequential test and impact assessment.</p> <p>The site contains two locally significant industrial sites. The intensification and co-location of these sites will be consistent with London plan policies, which has identified Brent as a ‘provide capacity’ borough. No permissions for non-employment uses within the LSIS will be allowed in advance of masterplans being approved which show how intensification/ co-location will work in practice.</p> <p>The site is in proximity to a number of green spaces. Adjoining to the east is a wildlife corridor. To the north is the White Garden which is a Grade I SINC of borough importance. In close proximity to the east is Queensbury Circle. Development at this site should seek to enhance these green spaces, not disrupt the movement of wildlife. To complement these features, the inclusion of green infrastructure should be designed into the site.</p> <p>A significant proportion of the site is susceptible to groundwater flooding. There are also areas of the site which are at risk to surface water flooding, however these areas are principally, but not exclusively, highways and areas associated within car parking.</p> <p>The site is located on an historical industrial site. A Preliminary Risk Assessment for contamination will be required, and if necessary remediation. The site is located within an Air Quality Management Area. As such, development at this site should be at least air quality neutral.</p> <p>Noise associated with the continued industrial use, or intensification of employment uses on site will need to be addressed in the design of development. The use of the road to the rear of Morrisons as a TfL bus layover will also need be taken account.</p> <p>There is some potential for taller buildings within this site boundary (up to 6 storeys), but there should be a stepping down towards the neighbouring residential uses, which are predominantly two storeys in character.</p> <p>To the left of the site is Honeypot Lane, which is a London Distributor road. A transport assessment for the site will be required to determine the impact that development at this site will have on the road network.</p>

Risks	<p>Fragmented ownership of the site could increase time taken to deliver, and if not properly managed result in piecemeal, rather than comprehensive approach to redevelopment, resulting in disjointed environments</p> <p>Part of the Lowther Road LSIS is located within Harrow’s administrative area. As a result, it is likely that cross-boundary working will be required to bring this site forward for development.</p>
Design Principles	<p>The design and layout of the area should be determined through the Masterplanning process. Key points that will need to be addressed within the masterplan include:</p> <p>Building heights should be no higher than 6 storeys and should step down towards the adjacent residential that will remain.</p> <p>Ensuring there is successful co-location/ intensification on the LSIS sites to ensure the area continues to prosper as an employment location.</p> <p>The site adjoins the Kingswood Centre which is a NHS building that provides a therapeutic environment of green space for patients. Development should ensure that there is not detrimental impact on its setting.</p> <p>Incorporating green infrastructure throughout the design, which contributes to the conservation and enhancement of the adjoining and nearby green spaces.</p> <p>Proposals should seek to promote walking and cycling, including making provision for a cycle route along Cumberland Road</p> <p>Improvements to public transport, improving pedestrian connections to Queensbury Station and creating an additional bus stand on Westmoreland Road.</p> <p>Active frontage along Honeypot Lane, Cumberland Road and Lowther Road, ideally using innovative design to reduce or remove any inactive frontage associated with the supermarket.</p>
Infrastructure Requirements	<p>Social and physical infrastructure requirements for this site to be fully drawn out in any future masterplan related to the residential capacity of the area. Retention of space for the 5 storey temple building on site. Improvements to public realm, incorporation of green infrastructure and improvements to public transport accessibility.</p>
Justification	<p>Within the boundary of the site are two areas of locally significant industrial sites, which are not intensively used and contain buildings which are in poor condition. Given Brent’s status as a ‘provide capacity’ borough in the London Plan, the proposed intensification and co-location at these sites will contribute towards meeting future employment needs. Furthermore, London Plan policy encourages the comprehensive redevelopment of low-density supermarket sites. The site is also located in an area of higher PTAL, in relation to the surrounding area.</p>



## BNSA4: BURNT OAK GROWTH AREA – FORMER MECCA BINGO SITE

<p>Site Boundary</p>			
<p>Existing Use</p>	<p>Vacant site – former bingo hall (closed in 2014)</p>		
<p>Allocated Use</p>	<p>Community use, employment space, some residential development</p>		
<p>Indicative Capacity</p>	<p>Unknown – will require detailed assessment as part of planning application</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
<p>Address</p>	<p>1 Burnt Oak Broadway, Edgware HA8 5LD</p>		
<p>Area</p>	<p>0.159ha</p>		



Description of Existing Site	<p>The site contains a purpose built inter-War 2000-seat cinema and associated front of house areas. It was converted into a bingo hall in the 1960s and closed on bingo use in 2014. The building height ranges between two to three storeys. The main entrance of the building is located in the north eastern corner of the site.</p> <p>To the north of the site is new residential development which is to contain a 7-storey residential block with retail units on the ground floor. To the south of the site is a number of shops, with residential uses above. To the east of the site is residential development within the Barnet administrative area, which is largely 3 storeys in height. To the west is residential area, which is predominately two-storey in character.</p>
Ownership	Private Sector
Relevant Planning History	This site forms part of site allocation B/C4 3-5 Burnt Oak Broadway. B/C4 was allocated for mixed use development to include residential and retail, and to introduce active frontages and a range of storey heights having regard for the residential properties located to the rear. Proposals at this site should contribute to transport improvements along the street frontage.
PTAL Rating	The PTAL rating of the site ranges from 4-5.
Planning Considerations	<p>The site is located within the town centre boundary of Burnt Oak. As such, the council would like to see active frontage created on this site, where considered appropriate. Furthermore, the site is within the boundaries of the Burnt Oak and Colindale Growth Area, being a sustainable location to accommodate growth.</p> <p>The former cinema on this site is Grade II listed and is a 'Building at Risk' contained on Historic England's Heritage at Risk Register. The cinema was constructed in 1938 and is a good example of a relatively unaltered large suburban neighbourhood super-cinema of the 1930s. Development at this site should ensure that proposals do not adversely affect its character as a building of special architectural or historic interest.</p> <p>In comparison to other areas within Burnt Oak and Colindale, this site has relatively high PTAL levels. Therefore, development at this site should be car-free.</p> <p>There are six trees within proximity to the site. Development at this site should not result in the loss of these trees.</p>
Risks	<p>Building continues to deteriorate whilst awaiting development</p> <p>Developer aspirations inconsistent with conserving the building's character to Historic England and the Cinema Theatre Association.</p>
Design Principles	The special significance of the building lies in its auditorium, foyer spaces and façades. New development should look to preserve these areas of significance. However, it is accepted that to make a scheme viable, new build on top and to the side may be the only option. Some subdivision of the auditorium may also be necessary. Proposals for the building should be carefully considered with its significance in mind within an options and viability appraisal for the site.
Infrastructure Requirements	Improvements to the public realm along Edgware Road to encourage the uptake of active travel.
Justification	The site is a Grade II listed building, located within the Burnt Oak town centre boundary. Development at this site can support appropriate improvements to the Grade II listed building, with the aim of removing it from Historic England's 'Building at Risk' register. There is a preference to create active frontage within this area to support the vitality and viability of the town centre, which can be achieved through introducing community floorspace on the ground floor of this site.

FIGURE 17 OTHER SITE ALLOCATIONS

REF.	ADDRESS	SIZE (HA)	EXISTING USE	ALLOCATED USE	INDICATIVE HOMES	COMMENTS
BNSA5	Former Kingsbury Library and Community Centre	0.5	Pupil Referral Unit	Mixed use redevelopment including the retention of the existing Pupil Referral Unit and retention of community led use	27	
BNSA6	Ex-Volkswagen Garage	0.35	Former car showroom	Residential development	28	
BNSA7	Kingsbury Trade Centre	0.19	Car showroom, car handwash	Mixed use redevelopment including the retention of existing employment floorspace		Within an area of archeological importance

FIGURE 18 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

REF.	ADDRESS	SIZE (HA)	EXISTING USE	PLANNING PERMISSION	INDICATIVE HOMES	COMMENTS
08/2823	Colindale Retail Park, (Wickes), Capitol Way, NW9 0EQ	1.5	Large retail warehouses and associated car parking	Residential/ Retail	219	Almost complete
15/1337	Oriental City, Edgware Road, NW9 0JJ		Buildings which housed 'Oriental City', a commercial and retail centre that provides goods and services orientated towards the Asian Market.	Residential, Retail/ Leisure, Primary School	83	Work in progress 2018
11/0403, 17/1342	Allied Carpets, 3 Burnt Oak Broadway HA8 5LD	0.27	Three storey building with large scale retail facility at ground floor level	Residential	76	Construction commenced summer 2014 and is ongoing.
17/1829	The Willows, Honeypot Lane	0.24	Vacant residential care home	Residential	50	Supported accommodation
15/3639	All Units, Watling Gate, 297-303 Edgware Road, Kingsbury		Business Units and Adult Learning College	Residential	43	Also has prior approvals

## 5.4 NORTH WEST



## NORTH WEST

5.4.1 This place comprises Northwick Park and parts of Barnhill, Kenton, Preston and Sudbury and wards. The place is bordered by Harrow to the north and west (Harrow-on-the-Hill). To the east is Fryent Country Park and Wembley Park and to the south is Sudbury.



FIGURE 19 MAP OF NORTH WEST PLACE

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HAMMERSMITH  
&

KENSINGTON  
&  
CHELSEA

## CHARACTER AND CULTURE

**5.4.2** The North West place is largely suburban in character, with housing focused around town centres, tube stations and significant pieces of social infrastructure (Northwick Park Hospital and the Harrow Campus of University of Westminster).

**5.4.3** There are four main character areas located within this place. The variations in character are not significant as the residential element predominantly within this place is based on suburban metro land 'Mock Tudor' vernacular. Northwick Park character area contains Northwick Park Hospital. This provides a stark contrast due to its scale and angular concrete and glass architecture. Its visibility is increased due to the open aspect of the soft landscaping of Northwick Park Metropolitan Open Land (MOL). This encloses it on two sides (east and south). Kenton character area is suburban residential focused around the high street and tube station. Similarly Preston Road character area is focussed on a high street which gradually slope from north to south and contains Preston Tube Station in its centre. Another key character area within this place can be around Sudbury Court Drive, which predominantly consists of semi-detached housing that vary in style. Houses along both sides of this road have large front gardens, and are set back from the main road by a pathway, access road and grass verge.

**5.4.4** There are three conservation areas located within the place:

- a) Northwick Circle - a typical 1920's and 30s residential development whose high quality architectural character is underpinned by relatively wide and generous roads, tree lined with grass verges between road and pavements
- b) Sudbury Court - housing development planned either side of a central spine of The Fairway. Houses are spaciouly positioned amongst garden buffers and tree lined roads, aided by gentle curves which help to define the garden suburb character.
- c) Mount Stewart - a typical 1920's and 30s residential development that contains housing that are Mock-Tudor style with variable elevational elements. Housing is set in wide generous roads, which in the main are tree lined with grass verges being a buffer between the roads and pavement.

**5.4.5** Located on the boundary of this place is Sudbury Cottages Conservation area, which contains the remains of this part of the historic core of Sudbury.

**5.4.6** There are two sites of archaeological importance within this place – Sudbury Court and Lyon's Farm. Sudbury Court is also designated as an Archaeological Priority Area.

**5.4.7** The most significant open space within this place is the designated Metropolitan Open Land (MOL) of Northwick Park. Northwick Park, and the adjoining site referred to as Ducker Pool, is also designated as a Grade I SINC of borough importance. Smaller open spaces, and other SINC sites are scattered throughout this place including John Billam Playing Fields, Woodcock Park, Woodcock Park North SINC, Wealdstone Brook from Kenton to the Jubilee Line SINC and Kenton Grange. Northwick Park and Kenton Rainside, which is designated as a Grade I SINC of borough importance, also acts as a wildlife corridor within this place.

## TRANSPORT

**5.4.8** The predominant Public Transport Activity Level (PTAL) within this place is 2. Higher PTAL ratings are located around Northwick Park and Kenton stations. Those areas with particularly poor transport accessibility are located within the south western corner, and scattered through the central region of this place.

**5.4.9** There are four underground stations located within this place; Kenton, Northwick Park, South Kenton and Preston Road. On the place's southern boundary is North Wembley Tube Station.

**5.4.10** The roads which forms the northern boundary (A4506) and western (A404) boundary of this place are London Distributor Roads.

**5.4.11** The Capital Ring goes from east to west across the central section of this place, passing through Northwick Park. It is a strategic walking route that connects the 33 London boroughs and their greenspaces.

## EMPLOYMENT AND EDUCATION

**5.4.12** Located within this place is the East Lane Business Park, which is designated as a Strategic Industrial Land (SIL). It is a mixture of older and newer industrial premises, supplemented by a small office element. It has a number of key strategic characteristics. These include good access to the strategic road network and a 'good and fit for purpose industrial land supply' which makes it supportive of employment activities.

**5.4.13** Employment within this place is concentrated within the public administration, education and health sectors. In general, the northern region of the borough accounts for a quarter of all micro businesses, and has the

joint highest level of self-employment in Brent (14% of economically active people being self-employed). The northern area of Northwick Park, where the hospital is located, has one of the highest concentrations of employees in Brent, providing approximately 8,000+ jobs. East Lane Business Park is the second highest, providing approximately 4,000-8,000 jobs.

**5.4.14** There are 8 primary schools, 1 all through and 3 secondary schools located within this place. The place also includes the University of Westminster Harrow campus, which focuses on design, creative and digital industries.

## TOWN CENTRES

**5.4.15** There are two town centres located within this place: Kenton Road and Preston Road.

**5.4.16** Kenton is a district town centre. Its location on the borough boundary means that part of the town centres lies within Harrow, although the majority is within Brent. In comparison to other centres, Kenton has a relatively high proportion of services. Anchors include Sainsbury's and Kenton Bridge Medical Centre. It also contains Kenton underground and overground station. Vacancy rates within Kenton are equivalent to the London average.

**5.4.17** Preston Road is a district centre. It extends along the Preston Road from Carlton Avenue East to The Avenue and includes Tesco Express as an anchor. It also contains Preston Road underground station. Similar to Kenton, Preston Road has a relatively high proportion of services but also has a range of comparison and convenience outlets. This town centre has relatively low vacancy rates in comparison to borough-wide levels.



CHALLENGES	OPPORTUNITIES
<ul style="list-style-type: none"> <li>• This place is generally poorly served by public transport. This has an impact on the accessibility of key destinations within this place, including Northwick Park Hospital and East Lane Business Park.</li> <li>• There is some variation in the levels of deprivation within this place, with areas of higher deprivation concentrated around the southern boundary and north eastern region of this place</li> <li>• While there is no open space deficiency within this Place, there is significant variation in the levels of accessibility to the different public park typologies.</li> <li>• Kenton Town Centre straddles Brent and Harrow administrative areas</li> <li>• After housing cost, child poverty within the Northwick Ward is 13%, Preston is 14% and Kenton is 10% and Sudbury is 18%</li> <li>• Child obesity varies significantly across the place – areas within the southern region of the place have relatively low childhood obesity (2.3-6.3), compared to the northern region where childhood obesity is high (11.3-23.4).</li> <li>• Some areas of the place have a higher proportion of Over 50s than others.</li> <li>• More than 1 in 6 residents were aged 65 and over in the Kenton Ward</li> <li>• There is great variation in the levels of proficiency in English across this place – areas of Northwick Park ward and Kenton have lower level of proficiency than Preston and Sudbury.</li> <li>• English is not the main household language for 19.8% of households within Northwick Park, with 0.9% of households not speaking English. The proportion of households in Kenton where no one was able to speak English was 19.6%</li> <li>• The uptake of cycling within the north of the borough is low, with it only accounting for 0-1% modal share of journeys.</li> </ul>	<ul style="list-style-type: none"> <li>• The Northwick Park development provides a number of opportunities for this place, which includes</li> <li>• Improvements to the Northwick Park Hospital and Clinical Research Centre</li> <li>• New and improved sports pavilion</li> <li>• Provision of affordable and specialist homes</li> <li>• Improvements to Northwick Park and Ducker Pool SINC (Grade I)</li> <li>• Enhancements to the Capital Ring section within Northwick Park</li> <li>• Improving sustainable transport access to, and within, this place through the implementation of a variety of transport schemes, such as:</li> <li>• Improvements to increase capacity and creating step-free access at Northwick Park Tube Station</li> <li>• Implementation of Quietways and other schemes within this place, in line with the Transport Strategy, to improve active travel</li> <li>• Improving the Capital Ring, which currently connects a number of parks within this place</li> <li>• Applying the ‘Healthy Streets Approach’ to improve pedestrian and cycling connections between Northwick Park Station and Kenton Town Centre</li> <li>• Increasing the quality of the open spaces and sports facilities within this place, which can be achieved through:</li> <li>• Pursuing pitch improvement opportunities at Northwick Park</li> <li>• Investment into purpose-built, non-turf cricket practice facilities at Northwick Park</li> <li>• Improved signage, pathways and infrastructure in the parks and open spaces within this place</li> <li>• Public realm improvements within Kingsbury Town Centre</li> <li>• Intensification of employment uses at East Lane.</li> <li>• Enhanced level of convenience goods provision within the two retail centres within this place.</li> </ul>



FIGURE 20 HIGH LEVEL PLAN OF THE PLACE



## VISION

**5.4.18** A place which seeks to retain and enhance the characteristics of its metro-land past. The place will be comprised of a series of attractive suburban neighbourhoods, whose character and local distinctiveness are enhanced through the Northwick Park Growth Area.

## PREFERRED POLICY OPTION POLICY BP4 NORTH WEST

Proposals should plan positively to deliver the place vision by adhering to the following principles:

## CHARACTER, HERITAGE AND DESIGN

Maintain and enhance local character and distinctiveness by:

- a) Continuing to conserve and enhance designated heritage assets within this area
- b) Protecting, and where possible, enhancing the established metro-land characteristics of the place
- c) Concentrating new tall buildings in the Northwick Park Growth Area, town centres and intensification corridors (A4006 Kenton Road)

## HOMES

- d) Providing approximately 2,600 new homes as part of development within the Northwick Park Growth Area, including specialist accommodation to meet identified demand.
- e) Delivering mixed-use development on the Sainsbury's Kenton Road site

## TOWN CENTRES

- f) Supporting the creation of new convenience floorspace within Preston Road and Kenton providing that they are of an appropriate scale, to support their local function
- g) Managing the likely overall reduction in length of the Preston Road and Kenton Town Centres

## COMMUNITY AND CULTURAL FACILITIES

- h) Protecting and enhancing playing pitch provision at Northwick Park, JFS School, and Tenterden Sports Ground

- i) Encouraging community use Bryon Court Primary School's sports facility

As part of the development within the Northwick Park Growth Area the following improvements to community and cultural facilities should be achieved:

- j) Redeveloped and/or enhanced university hospital
- k) Redeveloped and/or enhanced university facilities
- l) Enhancements to Northwick Park Sports Pavilion
- m) Improved setting of and better integration of open space within the site to Northwick Park

## EMPLOYMENT AND SKILLS

Supporting the local economy by:

- n) Retaining and encouraging intensification of SIL land at East Lane Business Park
- o) Promote employment growth/skills within the Northwick Park Growth Area

## OPEN SPACE AND BIODIVERSITY

Maintaining and enhancing the quality of the well-used, cherished public parks, open spaces and biodiversity areas through:

- p) Enhancements to Butlers Green Open Space, Northwick Park, Woodcock Park and Pellat Road Sports Ground
- q) Pursuing opportunities to increase the provision of pocket parks
- r) Protecting and enhancing existing wildlife corridors within this place
- s) Improving the Capital Ring route within this place in the aim of creating a new Green Chain

## TRANSPORT

- t) Improving Northwick Park station to increase capacity and establish step-free access
- u) Implementing Quietways to encourage uptake of active travel
- v) Improvements to road junctions around Northwick Park Growth Area and station with the view of improving road safety

- w) Improving walking and cycling infrastructure within this place, with a focus on improving pedestrian and cycling links between the three tube stations**

## JUSTIFICATION

### CHARACTER, HERITAGE AND DESIGN

- 5.4.19** There are three existing conservation areas within this place which have been designated due to their distinct and special character. To ensure that future development within these areas contribute positively to the character of this place, it is considered that the
- 5.4.20** The predominant character of this area is residential suburban, with a number of areas displaying characteristics which can be linked to the metro-land movement. Tall buildings within this place will not be in keeping with character of the majority of this place. The exception to this will be Northwick Park Growth Area, where the presence of tall buildings has already been established. In addition town centres and intensification corridors will accommodate development of potentially up to 15-18 metres (five or six storey development).

### HOMES

- 5.4.21** Northwick Park Growth Area provides the opportunity to provide a significant amount of housing in addition to satisfying a number of strategic policy objectives. The Growth Area has the potential to support student housing and large-scale purpose built shared living accommodation.
- 5.4.22** The Kenton Sainsbury's site provides an opportunity for comprehensive redevelopment of a low-density supermarket site. Its proximity to Kenton underground station makes it appropriate for intensification, incorporating residential development. The redevelopment of this site should ensure a replacement food store of comparable size with a layout and store entrance that better addresses the town centre.
- 5.4.23** Additional homes are likely to be concentrated along the A4006 Kenton Road intensification corridor (a main road with relatively good public transport), within the town centres, local shopping centres and on small scale infill/redevelopment sites, conversions and extensions. The volume of delivery through these sources is uncertain.

## EMPLOYMENT AND SKILLS

- 5.4.24** In comparison to other places within the borough, there are limited employment opportunities within the North West. There are two areas within this place that offer the opportunity to provide employment space and job opportunities. These are Northwick Park Hospital and Clinical Research Centre and East Lane SIL. The employment function at these two areas will be protected, and where possible, enhanced.
- 5.4.25** The Northwick Park Growth Area provides an opportunity to enhance or redevelop the facilities at Northwick Park Hospital and Clinical Research Centre and introduce an element of commercial and flexible workspace. Additional jobs on this site will help satisfy the strategic objectives of the borough. As will proposed state-of-the-art teaching spaces for both University of Westminster and the university hospital.
- 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.

## TOWN CENTRES

### COMMUNITY AND CULTURAL FACILITIES

- 5.4.27** The need for new community facilities within this place will primarily be within the Northwick Park Growth Area due to the significant increase in population that will occur as a result of the proposed housing development.
- 5.4.28** Improvements to Northwick Park Hospital, and the provision of additional hospital floorspace within this area, will be supported through residential development within the Northwick Park Growth Area. Improvements anticipated include upgrading the teaching space offered within the hospital to improve its efficiency.
- 5.4.29** Furthermore, the opportunities to improve the sports pavilion to support the development that is to come forward within the Growth Area will be supported. One option being considered is to swap that land currently occupied by the sports pavilion and car park with an equivalent area adjacent to Northwick Park station to create an open, active and welcoming frontage by the station. The location of the new sports pavilion has yet to be agreed. Any MOL land swap will need to demonstrate that it is in compliance with London and national policy, and ensure that there is no net loss in open space.

- 5.4.30** As part of the development, there is a desire to create a 'local hub', that will provide various uses such as commercial, retail and community uses. The exact nature of the 'local hub' will be informed by community consultation.
- 5.4.31** The potential to develop a new energy centre to supply energy to the University, Hospital and residential units will be explored.
- 5.4.32** The Council will explore opportunities to increase sports hall provision within this place at appropriate site(s).
- 5.4.33** Northwick Park has been identified as a strategic site for playing pitch provision within the borough, due to the number of pitches on site and the range of sports it supports. The Council will continue to protect playing pitch provision at this site, and where possible, pursue opportunities for its enhancement. Additional playing pitch sites that will be protected, and where possible enhanced, within this place include the pitches at JFS school and Tenterden Sports Ground. There are also a number of school sites within this place which can contribute to ensure adequate playing pitch provision within the borough.

## OPEN SPACE AND BIODIVERSITY

- 5.4.34** Whilst there is no open space deficiency within this place, there is a significant deficiency in access to pocket parks. Limited land availability means that Northwick Park Growth Area provides the best opportunity to increase provision of this typology.
- 5.4.35** In addition to increasing open space provision, it is important to ensure that the quality of the existing open spaces within this place are enhanced. The Council's qualitative assessment on open space found that overall quality of public park and open space provision was 'fair'. Scope for improvements were identified, in particular for Butlers Green, Pellat Sports Ground and Woodcock Park.
- 5.4.36** Improvements to Northwick Park will be required to support the growth in population as a result of the development within the adjoining Growth Area. Improvements to the park will need to ensure that local needs are satisfied and that the district park remains as a first class recreational facility.
- 5.4.37** Northwick Park and the Ducker Pool are a designated SINC site of borough importance (Grade I). The site's diverse habitat mosaic of woodland, short and long grassland, ponds, hedges, tree lines, mature/veteran trees and stream, means that it is one of the more valuable biodiversity sites in the borough.

## TRANSPORT

- 5.4.38** The projected growth in population across this place will place additional pressure on the road network, particularly around Northwick Park Hospital where most of the growth is focused.
- 5.4.39** One of Brent's Long Term Transport Strategy (LTTS) Objectives is to 'Increase the uptake of sustainable modes in particular active modes of travel'. There are a number of schemes and initiatives which can be implemented within this place which can help to achieve this objective. Such schemes include improving the public realm and creating a better link between Northwick Park Station and South Kenton Station.
- 5.4.40** As mentioned above, public transport accessibility levels within this place are low in comparison to other areas within the borough. However, improvements which will increase the capacity and introduce step-free access at Northwick Park Station will improve the public transport accessibility levels around the Northwick Park Growth Area.
- 5.4.41** The uptake of cycling within the north currently lags behind the south. The implementation of Quietways can encourage residents to cycle and walk, which in turn will contribute to the reduction in congestion. The LTTS indicated that resources will focus on improving cycling uptake within the north of the borough. The Council's Cycling Strategy identifies that a number of new cycle routes are being considered within this area. These routes will improve the existing local cycle network, and look to create new links between key destinations, such as the tube stations and open spaces.
- 5.4.42** Improving road safety within the borough is a priority. In particular, road safety around the Northwick Park Hospital area has been identified as an issue.

## KEY SITE ALLOCATIONS

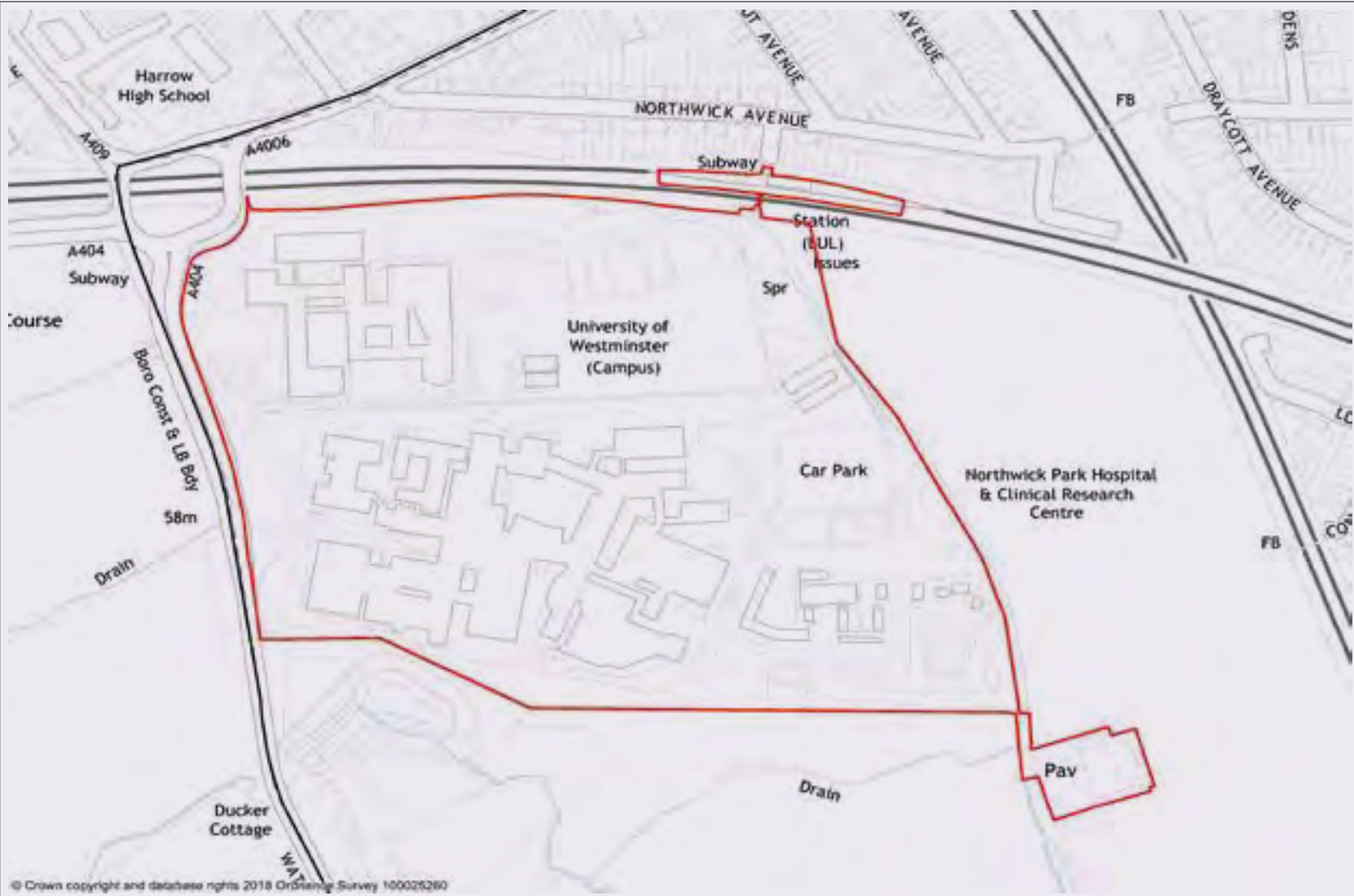
Northwick Park Hospital  
Sainsbury's Kenton Road

## OTHER POLICY GUIDANCE

- Northwick Park Master Plan/Supplementary Planning Document/ Area Action Plan (forthcoming)



## BNWGA1 - NORTHWICK PARK GROWTH AREA

<p>Site Boundary</p>	 <p>© Crown copyright and database rights 2018 Ordnance Survey 100025260</p>
<p>Existing Use</p>	<p>University of Westminster Harrow Campus and associated student accommodation, Northwick Park Hospital and associated car parking, residential, Northwick Park sports pavilion and Underground Station.</p>
<p>Allocated Use</p>	<p>Growth Area - the site has been allocated for mixed used development. Additional residential development to enable upgrades/ refurbishment to the existing and retained Northwick Park Hospital and University of Westminster facilities. A replacement sports pavilion, small amount of commercial floorspace, and possibly new small-scale non-acute medical facilities to also be provided on site.</p>

Indicative Capacity	Capacity for circa 3,600 units, of which 2,600 net additional		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	650	1950	1000
Address	Northwick Park Hospital, Watford Road, Harrow, HA1 3UJ University of Westminster, Northwick Park, Middlesex, HA1 3TP Northwick Park Tube Station		
Area	30.5 ha		
Description of Existing Site	<p>The site is located off Watford Road close to the Borough boundary with Harrow. It is formed of five main areas: Northwick Park District Park, Northwick Park Hospital, Northwick Park Tube Station, Northwick Park Hospital Residential Accommodation and the University of Westminster. Within the site is a part of the one-way road system (also referred to as a 'ring road') that comes off of Watford Road, the main vehicular access for the site. Adjoining the northern boundary of the site is the Northwick Park underground station and tracks.</p> <p>Northwick Park Station is a small, suburban station which has two platforms. The platforms are above the level of the surrounding area, and can be accessed by a flight of stairs from the ticket hall. The pedestrian connection from the station to Northwick Park is through a narrow tunnel. Access to Northwick Avenue is relatively open from the ticket hall, past a small shop.</p> <p>Northwick Park Hospital residential accommodation forms the eastern, and part of the southern part of the Growth Area. It consists of a number of affordable homes provided by Network Homes, some occupied by hospital employees. These are terrace homes and flats, predominantly 2 to 4 storeys. All housing is set back from the road behind either grass verges, hard landscaping or car parking spaces.</p> <p>Northwick Park Hospital Campus consists of a number of buildings varying in height between two and seven storeys, mixed in quality and age. Large portions of the hospital campus are dedicated to at grade car parks. A multi-storey is located in the west. Northwick Park hospital provides a full range of services, which includes neurology, cardiology and elderly care medicine. It also has a 24/7 A&amp;E service and Urgent Care Centre. It one of the eight Hyper Acute Stroke Units within London. There are a number of trees located along the eastern boundary which provide a visual screen to Northwick Park.</p> <p>University of Westminster comprising a number of buildings forms the western part of the Growth Area. Between these there are some areas of open/communal space. Halls of residence are located within its northern part with an associated green space, not currently publicly accessible. This green space has a variation in site levels and a number of trees. A number of trees line the southern boundary of the university site, acting as a visual break between it and the Northwick Park Hospital.</p> <p>Northwick Park sports pavilion provides changing rooms and facilities to support recreation on the park. The facility is tired, needing significant investment to enhance its quality to allow the sports pitches to be used to their potential.</p>		
Ownership	The London Borough of Brent, London North West University Healthcare NHS Trust, the University of Westminster and Network Homes are the key landowners. They have committed to work in partnership through a memorandum of understanding to promote the redevelopment of land at Northwick Park in a comprehensive manner through joint-working as part of the One Public Estate programme.		
Relevant Planning History	There have been numerous applications for the hospital site including new buildings, extensions, creation of multi-storey car park, ancillary services/infrastructure and facilities to support the functioning of the hospital.		
PTAL Rating	The site has a mixed PTAL rating. Around the University of Westminster campus the PTAL ranges from 4 to 5. It then decreases to PTAL 3 and 4 around the Northwick Park Hospital, dropping to 2 at Northwick Park Hospital Residential Accommodation and Northwick Park sports pavilion.		

<p>Planning Considerations</p>	<p>Adjoining the Growth Area to the east and south is Northwick Park. Designated as Metropolitan Open Land (MOL), it is afforded the same protection as Green Belt in Policy G3 of the London Plan. Located within the boundary of Northwick Park is a sports pavilion. It is proposed that the sports pavilion is relocated to create an active frontage between the station and hospital. This will also create a more open feeling across the park. Any MOL land swap as part of the relocation of the sports pavilion should ensure that there is no net loss within MOL area. The value of the land designated as MOL should also be improved, having regard to all criteria in Part B of London Plan Policy G3.</p> <p>London Plan Policy H10 does not allow loss of existing affordable housing unless replaced by equivalent or better quality accommodation that is of equivalent floorspace and price to occupiers. Policy H5 requires public sector land development to deliver at least 50 per cent affordable housing.</p> <p>There is potential for some tall buildings, subject to being a high quality design. These should respond to the height of the existing hospital buildings, stepping down towards the MOL and areas to the north. The appropriate height, extent and location of buildings will be identified within a masterplan for the site. Consideration will need to be given to the site's location next to MOL to ensure that there is no inappropriate impact on its setting. Part of the site also falls within the Ministry of Defence (MOD) safeguarding zone for RAF Northolt, in which the MOD will need to be consulted if development is over a certain height – 15.2m for development that occurs within the boundaries of the University of Westminster Campus and the majority of the hospital campus, and 45.7m for the hospitals eastern car parks and residential accommodation.</p> <p>Furthermore, there is an area of green space located to the rear of the student accommodation, which has an open space designation. Whilst it might be appropriate through the masterplanning and development process to relocate or disaggregate this open space, overall no net loss will be acceptable. This will be in addition to satisfying the urban greening requirements and providing sufficient children's play space, in line with London Plan policies G5 and S4. Running adjacent to the site's southern boundary is the Capital Ring. Development should not impact upon the functionality of the Capital Ring, and should seek its enhancement wherever possible.</p> <p>Adjoining the site to the south west is Ducker Pool, a Site of Importance for Nature Conservation (SINC) (Grade I), also subject to a group Tree Preservation Order. The Growth Area's increase in residents could add to its recreational use. Mitigation measures to addressed potential adverse impacts should be identified as part of the masterplanning process.</p> <p>The western part of the site is within an Air Quality Management Area. As such development should be at least air quality neutral, ensuring occupants have an acceptable level of air quality.</p> <p>Vehicular access to the site is from Watford Road. This is often congested with traffic moving between Harrow and Wembley areas. Development should exacerbate this and ideally new junction solutions will improve it. Within the site is a 'ring road'. This provides emergency services access to the A&amp;E department. Development must ensure satisfactory vehicle (including emergency) movement is maintained. South Kenton has poor pedestrian access to the site. Furthermore, Northwick Park station's access is via a narrow brick tunnel. No step free access is possible to platforms. Development should seek to address these issues.</p> <p>Northwick Park Hospital is located on a former industrial site. A Preliminary Risk Assessment will be required to identify the potential for contaminated land, and if necessary suitable remediation then undertaken to allow safe development.</p> <p>An interchange incorporating a suitable bus turning point, stand and associated driver facilities will need to be incorporated into the development. This will improve the connection between the underground and buses and transfer bus routes from the surrounding road network north of Northwick Park Station.</p> <p>None of the site is within Flood Zone 3 for fluvial flooding. Parts are however in zone 3 for surface water, the majority being highway land. In the south of the site, flooding from reservoirs failure exists. Some northern parts are susceptible to sewer flooding. More detailed assessment will be required through a site specific flood risk assessment.</p>
<p>Risks</p>	<p>A number of infrastructure requirements are necessary to support the delivery of the scheme. The costs of these could result in delays to delivery. Final approval of a significant investment Housing Infrastructure Fund to improve the junction access is required. Subsequent delivery will need to meet short deadlines.</p> <p>Continued operation of hospital functions during construction phrase. Prior to the redevelopment of operational land, existing uses will need to be decanted to other areas. Therefore, re-provision on these uses on other land (i.e. staff car parks, student accommodation or Trust accommodation) will be needed, which places greater need on the phasing of this development to be considered carefully.</p>



Design Principles	<p>The design and layout of the scheme should be determined by a comprehensive master planning exercise. Key points that will need to be addressed include:</p> <ul style="list-style-type: none"> <li>ensuring the scheme blends into Northwick Park and does not have an inappropriate impact on its setting</li> <li>sufficient open space provision is found throughout the site, including retention of existing mature trees and the provision of any open space lost</li> <li>providing high quality public realm and improved pedestrian environment between the development, Northwick Park Station and South Kenton</li> <li>edges of development responding to the suburban nature of the surrounding area, particularly to the north.</li> </ul> <p>Tall buildings on the site should respond to the height of the existing hospital buildings, and ensure that there is a stepping down towards the MOL and 2-storey character to the north.</p>
Infrastructure Requirements	<p>Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site.</p> <p>Upgrades to the junction at Watford Road will be needed to support development at this site. Improvements to the capacity and pedestrian accessibility to Northwick Park Station. Improved sports and leisure facility as part of the MOL land swap, green infrastructure and public realm throughout the site. A site wide energy network. An infrastructure agreement will be drawn up and signed by all four key partners.</p>
Justification	<p>Northwick Park Growth Area provides an opportunity for a fundamental review of separate uses over a significant area that have been developed in a piecemeal fashion over many years with a view to improving the efficiency of land use. This will provide health, educational, recreational and public transport facilities that can better meet needs, as well as addressing the requirements in Brent for additional homes.</p>

## BNWSA1: KENTON ROAD SAINSBURY'S AND ADJOINING LAND

<p>Site Boundary</p>			
Existing Use	Sainsbury's superstore and associated car parking and some railway land.		
Allocated Use	Mixed-use development incorporating a retail store of comparable size and residential development.		
Indicative Capacity	Superstore of equal size and up to 150 dwellings.		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		150	
Address	1 Nash Way, Kenton, HA3 0JA		

Area	2.45 hectares
Description of Existing Site	The site currently consists of one large superstore (Sainsbury's) surrounded by large amounts of parking. There is a small piece of railway land included to the south. The site is bordered by a railway line to the west. Dwellings back onto the car park along the eastern edge of the site. There is also a small area of open space to the west of the site, which provides a green barrier between the store and Draycott Avenue. Located to the north of the site is Kenton Town Centre; the site forms part of the town centre boundary but is currently set back from the majority of the shops due to the road layout.
Ownership	Private and small part public ownership
Relevant Planning History	No planning history of relevance.
PTAL Rating	The sites PTAL rating ranges from 4-5; PTAL rating of 5 is in the northern region of the site, covering the majority of the supermarket building.
Planning Considerations	<p>The site forms part of the primary frontage of Kenton Town Centre, and as an anchor the supermarket is a significant draw. As such its retention, or a replacement of equivalent size is sought. The supermarket's relationship to the town centre needs to be greatly improved through the positioning of its entrance and creation of active frontage along its northern and eastern boundary. This will ensure it makes a stronger and wider contribution to the vitality and viability of Kenton Town Centre.</p> <p>The streetscape, particularly the mini-roundabout on Nash Way is an insensitive over-engineered solution that provides a poor pedestrian environment. Improving this needs to be part of a development solution.</p> <p>There is an area of undesignated green space to the east of the site. Improvements to this area of green space should be sought as part of any redevelopment.</p> <p>The location next to the West Coast Mainline/ Overground and Underground lines to the west will require appropriate mitigation to ensure occupants of any development are not adversely impacted by noise and vibration. The railway is also a designated wildlife corridor. Development should not adversely impact on this. Urban greening elements should be included within the development to enhance and complement this feature.</p> <p>The site is susceptible to sewer and groundwater flooding. A small area of the north western corner is susceptible to surface water flooding. A flood risk assessment will need to be submitted which demonstrates how the development will mitigate against flood risk.</p> <p>Part of the site is located within an air quality management area. Development will need to be at least air quality neutral.</p> <p>A transport assessment will be required to determine that impact that residential development may have on this site.</p>
Risks	Incentive for Sainsbury's to develop given potential impacts on operations of the existing store which is trading well.
Design Principles	<p>The entrance to the store should have a greater focus on addressing Kenton town centre. Active frontage should be created along the northern and eastern edges along Nash Way and Draycott Avenue. The site's visibility from Kenton Road requires a high quality/ landmark design for the northern edge of the site.</p> <p>The general character of the surrounding residential area is 2 storeys. 3 storey buildings are located to the north along Kenton Road. The large site, together with its proximity to a town centre and public transport accessibility will allow for some greater height than existing of up to 5 storeys in parts, subject to appropriate step down/ relationships to homes along Draycott Avenue. Development should incorporate green infrastructure, particularly adjacent to the wildlife corridor. This should enhance the natural and ecological value of this area but also help mitigate poor air quality.</p>
Infrastructure Requirements	<p>An appropriate amount of car parking spaces will need to be retained for the superstore. Improved access arrangements/ public realm should be informed by design and access statement/ transport assessment.</p> <p>Incorporation of green infrastructure on the site.</p>
Justification	The site is located provides an opportunity for mixed-use development in a sustainable location. The site currently has limited visual impact on the high street of Kenton due to its set back location. The re-development of this site will offer the opportunity to better incorporate the superstore into the town centre frontage, and provide a more appealing development. As encouraged within the London Plan, mixed-use redeveloped is encouraged at supermarket sites, and development within close proximity to tube station should seek to optimise the potential for housing delivery. The London Plan also encourages residential development within town centre locations as it will help to provide homes in well-connected places that will help to sustain local communities.

FIGURE 21 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

REF.	ADDRESS	SIZE (HA)	EXISTING USE	PLANNING PERMISSION	INDICATIVE HOMES	COMMENTS
17/3717	79-83 Kenton Road		3 two-storey dwellings	Residential	39 (36 net)	
16/3294	Clock Cottage next to Kenton Road Garage	0.24	Former stable used for storage	Residential	17	Assisted Living Accommodation
11/1042	2A Preston Waye and 283, 285 and 287 Preston Road	0.185	4 residential dwellings	Residential	30 (26 net)	Greater capacity potential on site than planning permission
15/4367	1-5 Peel Road		NA	Residential	11	Assisted Living

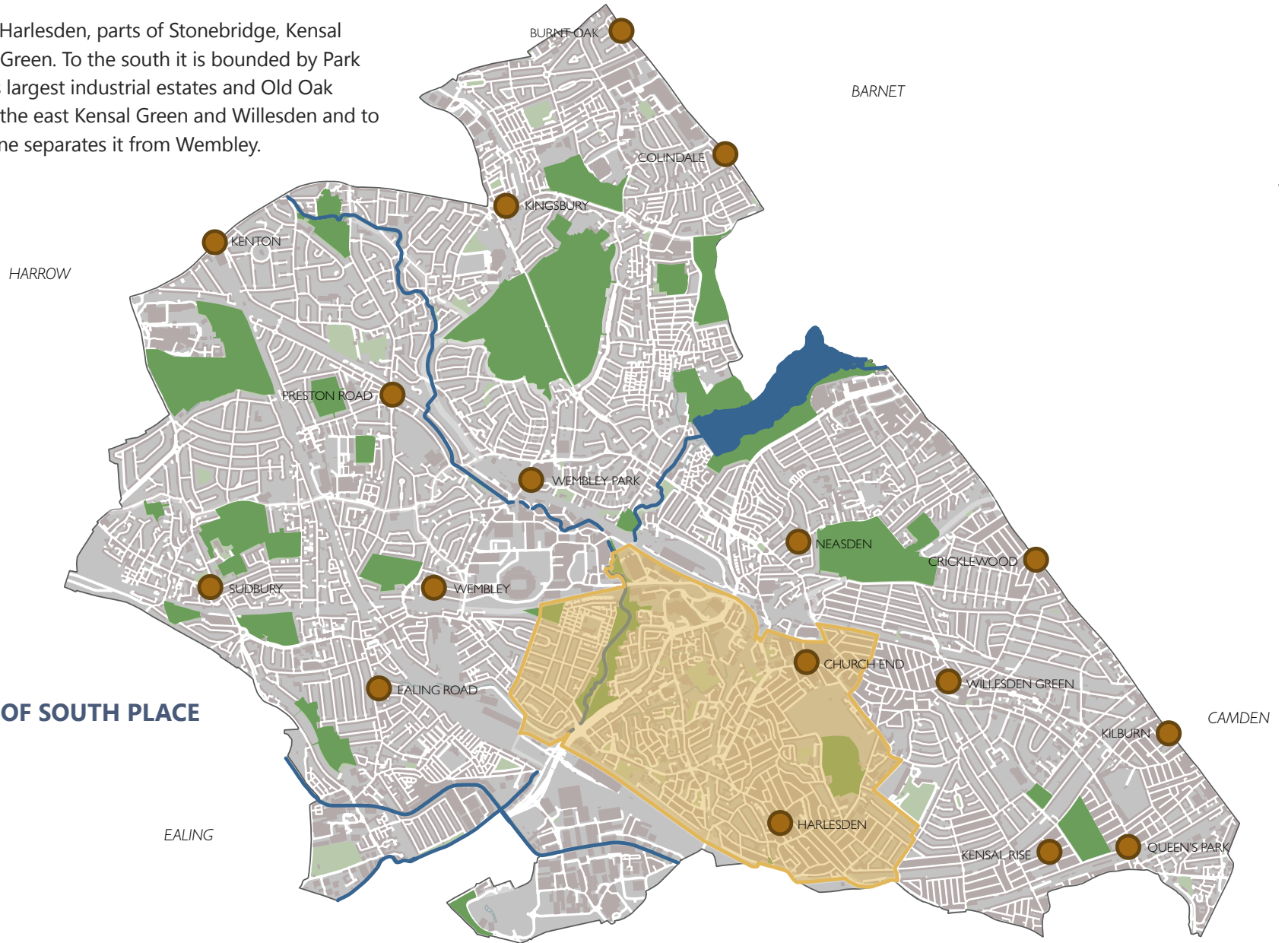


# 5.5 SOUTH



## SOUTH

**5.5.1** This place comprises Harlesden, parts of Stonebridge, Kensal Green and Willesden Green. To the south it is bounded by Park Royal one of Europe’s largest industrial estates and Old Oak Opportunity Area, to the east Kensal Green and Willesden and to the north a railway line separates it from Wembley.



**FIGURE 22 MAP OF SOUTH PLACE**

## CHARACTER AND CULTURE

- 5.5.2** This place has a diverse community and history, which is reflected in its buildings and attractions. Character varies with pockets of industry and retail warehouses to the north, and to the south large open spaces, terraced housing and Victorian High Streets. Stonebridge Estate which comprised high rise development from the 1960/70s, has been subject to investment and redevelopment. St Raphael's is a housing estate with a mixed architectural character from 1960s three-four storey apartment blocks to more traditional two-storey terraces to the east.
- 5.5.3** The Shri Swaminarayan Mandir Hindu Temple is an important landmark and visitor attraction that highlights this area's cultural importance. It was hand carved from 5,000 tonnes of Italian and Indian marble in India before being assembled in Neasden. Other local landmarks include the Jubilee Clock which forms the focal point of Harlesden. Harlesden has a vibrant Caribbean culture, and is considered the place where reggae music was introduced to London in the 1960s. It is still home to Hawkeye reggae record shop and local musicians.
- 5.5.4** Other notable community and cultural attractions include the Roundwood Children's Centre, SUFRA community kitchen and edible garden in St Raphael's' Estate and Bridge Park Leisure Centre in Stonebridge.

## TOWN CENTRES

- 5.5.5** Harlesden Town Centre's offer reflects its diverse community, with authentic Portuguese, Brazilian and Jamaican restaurants and shops. Church End is a smaller neighbourhood centre. Its offer includes an Afghan Cultural Centre and a market which is currently being redeveloped.

## EMPLOYMENT AND EDUCATION

- 5.5.6** Locally Significant Industrial Sites in Church End contain low density employment uses and have a poor quality environment. Brentfield Locally Significant Industrial Site in Harlesden contains more modern managed workspace and a power station. Being located in between Park Royal and Wembley industrial sites, a high proportion of jobs in this place are in manufacturing and wholesale, logistics and transport. Harlesden however also demonstrates an entrepreneurial culture with the highest level of business start-ups in the borough alongside Wembley.

## OPEN SPACE AND BIODIVERSITY

- 5.5.7** The River Brent, which is surrounded by a large open space known as Brent River Park, runs to the west of St Raphael's Estate. To the east Roundwood Park offers opportunities for recreation, and is adjoined by the Grade II Listed Willesden Jewish Cemetery which has benefited from Heritage Lottery Funding for enhancements including a new visitor centre. Sports pitches are located at Tokyngton Recreation Ground (part of Brent River Park) and Gibbons Recreation Ground.

## TRANSPORT

- 5.5.8** The south of this place has good links to Central London via Harlesden, Stonebridge Park and Willesden Junction stations which are served by the Bakerloo Line and Overground. The planned High Speed 2 and Elizabeth Line interchange at Old Oak will further improve connectivity. The north however is more dependent on buses, which are less reliable due to road congestion.
- 5.5.9** Cycle routes are predominantly on road in this place and include routes from Stonebridge to Kensal Green, and Harlesden Station to Roundwood Park to the east and Church End to the north. Exceptions include off road routes along Brent River Park and between Harlesden and Roundwood Park. The Brent Long Term Transport Strategy identifies the potential for future cycle routes from Harlesden to Wembley and Cricklewood to the north and Old Oak to the south.

CHALLENGES	OPPORTUNITIES
<ul style="list-style-type: none"> <li>• Neasden Temple, although an asset which attracts people from around the world, is currently challenging to travel to by walking or cycling. Some surrounding buildings also do not complement its setting.</li> <li>• Wembley Point, Bridge Park Leisure Centre and the Unisys Building at Stonebridge Park currently present an unattractive gateway into the borough. Bridge Park is a dated leisure facility.</li> <li>• The indices of Multiple Deprivation indicates St Raphael's Estate is one of the most deprived areas in Brent, with high unemployment levels and low levels of reported good health. Facilities in the area are limited with the exception of SUFRA community centre and edible garden. The estate has a poor quality environment and turns its back to the Brent River Park.</li> <li>• St Raphael's and Mitchell Brook Estate feel isolated and are poorly connected to each other and the surrounding area.</li> <li>• Church End Town Centre demonstrates high levels of vacancy, betting shops and takeaways.</li> <li>• Air Quality along the North Circular is particularly poor.</li> <li>• Public transport accessibility levels are lower to the north.</li> <li>• Harlesden Overground station lacks a sense of arrival and is not well connected to the surrounding area. The same is true of Neasden which is outside this place, but could better serve the area.</li> <li>• Part of Wembley industrial site is occupied by Ikea and Tesco stores. The site is underutilised, poorly connected to the surrounding area and have a low quality setting.</li> <li>• Football pitches at Tokyngton Recreation Ground are over capacity.</li> </ul>	<ul style="list-style-type: none"> <li>• Enhance the setting of and wayfinding to Neasden Temple through redevelopment of surrounding sites.</li> <li>• Improve Stonebridge Park gateway through redevelopment to include a modern leisure centre.</li> <li>• Continue planned improvements to Stonebridge Estate, including new housing and investment in open spaces, to further enhance the character of this area.</li> <li>• Improve life chances for those living in St Raphael's Estate by enhancing facilities and improving the quality of the built environment, improving its relationship with the adjoining Brent River Park and connections to surrounding communities. Enhancements to the Brent River Park could ensure this is a better used open space, whilst also helping to reduce flood risk.</li> <li>• Plans to improve the market at Church End could be a catalyst to improve this town centre. There is also an opportunity to improve low density Locally Significant Industrial Sites and make more efficient use of land, particularly at sites in Church End which form a natural extension to the current growth area.</li> <li>• Old Oak is both a challenge and an opportunity particularly for Harlesden. Harlesden Town Centre needs to be promoted as distinct from Old Oak, with its cluster of multicultural independent shops and restaurants, and music scene. There is a need to work with the Old Oak and Park Royal Development Corporation to improve links between Harlesden Town Centre and Willesden Junction. There is also potential to promote Harlesden to creative businesses looking to relocate from Old Oak due to redevelopment, and potentially for designation as a Creative Enterprise Zones by the Mayor of London which recognises an area's contribution to supporting creative activity, including artists and creative businesses.</li> <li>• Re-opening the Dudding Hill freight line as the West London Orbital passenger line is a key opportunity to improve accessibility to the north of this area, and reduce car reliance.</li> <li>• Improve sense of arrival at Harlesden underground stations.</li> <li>• To improve the connectivity of this area with cycle routes from this place to Wembley, Cricklewood and Old Oak.</li> <li>• Better utilise Wembley industrial site, enhancing the quality of environment and improving linkages to the surrounding area.</li> <li>• Improving football pitches at Gibbons Recreation Ground will help meet demand and take pressure off Tokyngton Recreation Ground.</li> </ul>



FIGURE 23 HIGH LEVEL PLAN OF THE PLACE



## VISION

- 5.5.10** A vibrant place which celebrates its diversity and cultural assets including Neasden Temple. Harlesden will have strong links to Old Oak via Willesden Junction, but will keep its distinct identity as a place with multicultural shops, cafes and restaurants with a night time offer which celebrates its musical heritage.
- 5.5.11** The West London Orbital will improve Church End's connectivity to London as a whole. Mixed use development will make Church End Growth Area a more attractive neighbourhood in which to live and work focussed around a vibrant multi-cultural local centre with a thriving market.
- 5.5.12** St Raphael's, Stonebridge and Mitchell Brook will be places which offer a high quality of life, better integrated with their surroundings and improved open spaces, built environment, community and leisure facilities.

## PREFERRED POLICY OPTION: BP5 SOUTH

**Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:**

## CHARACTER, HERITAGE AND DESIGN

**Strengthen local identity and character by:**

- a. Conserving and enhancing heritage assets and their setting, in particular that of Neasden Temple and Harlesden Conservation Area.**
- b. Positively responding to the predominantly low rise character of the area, enhancing the local setting and having a comfortable relationship with adjacent areas, while providing a dense development pattern.**
- c. There is an opportunity for some taller buildings near Wembley Point to mediate between Wembley Point and surrounding low-rise. This will be subject to buildings being of the highest design quality, enhancing the local setting and having a comfortable relationship with adjacent areas. Additional taller buildings of up to 15-18 metres (5 or 6 storeys) could be appropriate in town centres and the intensification corridors of A404 Harrow Road/Brentfield/Hillside and Craven Park, A407 High Road and A4088 Dudden Hill Lane.**
- d. St Raphael's Estate is a priority area for the Council. The Council will engage with the community to develop a strategy for this area as a potential area of change. To help address issues identified and deliver**

**more homes, the Council is considering options for the estate including refurbishment with limited new build and re-development, the latter of which would require a ballot**

## HOMES

- e. Church End Growth Area will be extended to include adjoining industrial sites and a masterplan produced to guide its improvement to a mixed use neighbourhood.**
- f. The final phases of Stonebridge Park will be completed.**
- g. The Harlesden Neighbourhood Plan provides policies and guidance on sites for housing and mixed-use development in the Harlesden Neighbourhood Area.**

## TOWN CENTRES

- h. Harlesden town centre's retail and evening economy offer will be protected and enhanced. New convenience and comparison retail floorspace will be directed to Harlesden town centre.**
- i. Church End town centre will provide convenience retail for local communities, including a market.**

## EMPLOYMENT AND SKILLS

**Supporting the local economy through:**

- j. Co-location of employment and residential uses at Church End Locally Significant Industrial Sites, subject to the requirements in policy BE2.**
- k. Retaining and encouraging intensification of employment uses at Brentfield Locally Significant Industrial.**
- l. Supporting the establishment of new Creative Quarters at Harlesden. Within Creative Quarters proposals to redevelop local employment sites will be required to re-provide high quality affordable workspace on site in accordance with policy BE3.**

## COMMUNITY AND CULTURAL FACILITIES

- m. A new high quality indoor leisure facility with swimming pool provision will be secured on the Unisys Bridge Park site.**
- n. Protect playing pitch facilities at Tokyngton and Gibbons Recreation Ground.**

- o. A new 6 form of entry secondary school and college will be secured on the Chancel House site.**
- p. A new space within Church End Growth Area to serve as an employment, community and health hub.**

## OPEN SPACE AND BIODIVERSITY

**Contribute to high quality, well-used open spaces and wildlife corridors to include:**

- q. Enhancements to Sherren's Farm Open Space, Evefield Open Space, Brentfield Park, Church End Open Space and St Mary's Open Space.**
- r. Prioritise tree planting in areas with poor air quality, particularly along the North Circular Road and other transport corridors.**
- s. Reduce flood risk at Brent River Park through environmental enhancements.**

## TRANSPORT

- t. Safeguard land for the West London Orbital route.**
- u. Enhance the setting of Harlesden Station and its connectivity to the surrounding area.**
- v. Enhance connections to Neasden Temple through wayfinding.**
- w. Create strong links between Harlesden Town Centre and Old Oak via Willesden Junction through wayfinding and public realm improvements.**
- x. Enhance cycle routes from Harlesden to Cricklewood, Wembley and Old Oak.**

## JUSTIFICATION

### CHARACTER, HERITAGE AND DESIGN

**5.5.13** Adjacent Stonebridge Park Station is the 21 storey Wembley Point building and 8 storey Unisys. The Unisys building has been long-term vacant and is currently in a poor condition. Wembley Point is a 1970s office building. Both buildings are located at an important gateway to the borough highly visible from the North Circular road and by rail. It is considered a cluster of taller buildings could be appropriate in this location, subject to a building being of a high quality design which contributes to the sense of arrival to the borough and development stepping down to the surrounding low-rise.

**5.5.14** St Raphael's Estate experiences high levels of deprivation and a low quality environment. It is poorly connected to the surrounding area and nearby facilities including Brent River Park and retail to the north. The Council will engage with the community to develop a strategy to help to address the multiple challenges faced in St Raphael's as a potential area of change. The Council's existing Housing Strategy 2014-19 states that estate-based regeneration schemes such as in the St Raphael's Estate are expected to deliver new supply alongside improvement or replacement of existing stock in line with regeneration priorities. To help address issues identified and deliver more homes, the Council is considering options for the estate including refurbishment with limited new build and re-development, the latter of which would require a ballot.

## HOMES

**5.5.15** Church End is an existing growth area identified for 800 new homes, community facilities and a new outdoor market. The West London Orbital will further improve the connectivity of this area making it a desirable location to live and work. As set out in the following section there is an opportunity to extend the Growth Area to include nearby low density employment sites to promote investment in these areas. In advance of adoption of a Church End masterplan supplementary planning document which will seek comprehensive solutions for these employment areas, small scale release of sites will be resisted.

**5.5.16** The delivery of improved housing and community facility at Stonebridge Park is to be continued. Initial phases replaced 1960s high rise housing with award-winning high quality homes, improved public open space and the Roundwood Children's Centre. These developments have improved the quality of the environment and provided mixed communities with social and private housing. Further phases will include new homes at Emerald Gardens, an extension to Stonebridge Primary School including enhancements to open space and new play space. Once complete the scheme will have provided 1,850 new homes including 1,100 for social rent and a new community and health centre.

**5.5.17** The Harlesden Neighbourhood Plan produced by the Harlesden Neighbourhood Forum will guide the development of Harlesden. A key priority for the forum is to promote housing delivery, in particular affordable housing in this area. The plan contains seven proposed development sites. A key site is the Harlesden Plaza at the town centre's core. The plan proposed

a mixed use scheme including retail, residential, community space and a new public square to create a focal point. In addition to the sites identified in the neighbourhood plan, the redevelopment of sites surrounding Harlesden station could help improve this gateway and connectivity to the town centre.

## TOWN CENTRES

- 5.5.18** Retail floorspace should be directed towards Harlesden district centre as the highest-order centre in the place. This will ensure it remains a resilient shopping destination able to meet local shopping needs. This is important in light of the proposed new town centre floorspace at Old Oak Common. Harlesden does not presently have a strong evening economy offer, and many residents are travelling to locations further afield. Its enhancement would retain a greater proportion of spend locally, and help diversify the offer of the town centre.
- 5.5.19** Church End serves a local catchment. Although its retail offer is currently limited, the redeveloped market will be a catalyst to improve this area.
- 5.5.20** Both are priority town centres that will be subject to action plans related to a range of issues that seek to improve their vitality and viability.

## COMMUNITY AND CULTURAL FACILITIES

- 5.5.21** Population growth will give rise to the need for new community facilities in this area, as evidenced by the Brent Infrastructure Delivery Plan. In particular there is a need for a new secondary school which is to be delivered on the Chancel House site in Church End. Church End as a growth area will experience population growth and will also have improved connectivity due to the West London Orbital, making it a preferred location for a new secondary school. Increased population will give rise to the need for a community and health hub in Church End Growth Area.
- 5.5.22** Reported levels of good health are lower in this parts of the borough than elsewhere. Investment in sport and leisure facilities is therefore particularly important. Redevelopment of Bridge Park to provide a new modern leisure centre will ensure this part of the borough has a better sports offer, which will have associated health benefits.

## EMPLOYMENT AND SKILLS

- 5.5.23** Parts of this place experience high levels of deprivation and unemployment,

scoring within the country's top 10% of most deprived areas. There is therefore a real need to increase employment levels and job quality by promoting investment in employment sites. Church End Locally Significant Industrial Sites are low density employment sites, which also contain uses including retail. These sites have experienced limited investment and in places have a low quality environment. Intensifying these areas through mixed-use development will encourage investment whereby residential development can support the provision of modern workspace to help meet the borough's need for incubators, accelerators and co-working space. The West London Orbital route will greatly increase public transport accessibility levels in this location, further supporting the need for higher density development on these sites.

- 5.5.24** Brentfield Locally Significant Industrial Site in contrast has benefitted from investment. It contains Artesian Close a modern managed industrial estate and power station. It benefits from its proximity to Park Royal and good links to the north circular via Brentfield Road. Although some of the surrounding units are in a poor condition there is an opportunity to improve this site through intensification.
- 5.5.25** The Brent Workspace study identified existing clusters of creative industries in Harlesden, and an unmet demand for incubators, accelerators and co-working space. In addition, the redevelopment of Old Oak is an opportunity to attract displaced businesses looking to stay in the local catchment. Retaining and enhancing creative clusters will bring a number of benefits. These include improving employment opportunities, encouraging enterprise and reducing the need to travel to central London with its associated pressure on the transport network. Where redevelopment of local employment sites are proposed mitigation will be required in the form of new affordable workspace to meet identified need.

## OPEN SPACE AND BIODIVERSITY

- 5.5.26** Generally this place is well served by open spaces ranging in scale from district parks to pocket parks. There are however some areas that are deficient such as Church End and Willesden Green. The Keep Britain Tidy Qualitative assessment identified that whilst many of the open spaces in this place scored highly, a number are in need of improvement. To ensure this place is served by high quality open spaces improvements should be prioritised to Brent River Park, Sherren's Farm Open Space, Evefield Open Space, Brentfield Park, Church End Open Space and St Mary's Open Space.

**5.5.27** Brent River Park and some existing properties in the surrounding area are located within a flood risk zone. Enhancements to the park can be designed to also help reduce flood risk.

## TRANSPORT

**5.5.28** Projected population growth will place pressure on the road network, meaning the only sustainable long term solution is to promote active and sustainable travel over private vehicle use. A key barrier to this is that orbital links here are reliant on the bus network and therefore less reliable. The West London Orbital, which will make use of the existing Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to High Speed 2 and Elizabeth Line and Old Oak and to the east Thameslink at Brent Cross West. This will significantly improve public transport accessibility levels in areas which are currently poorly served. Opportunities to allow better connectivity across the line can also be considered.

**5.5.29** To ensure public transport is the preferred mode of travel it will be important to ensure underground stations provide good interchange facilities and are well connected to the surrounding area. At present Harlesden Station this is not the case. On exiting the station there is a lack of sense of arrival; wayfinding is currently poor. Redevelopment of the surrounding area and investment in the public realm will allow the station's relationship to the surrounding area to be significantly enhanced.

**5.5.30** The regeneration of Old Oak, an existing industrial sites to the south of Harlesden, is planned. It will deliver 24,000 homes and 55,000 new jobs focussed around a new High Speed 2 and Elizabeth Line interchange. Intensification in Park Royal is to deliver a further 10,000 jobs and 1,500 homes. 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, Transport for London 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 through an enhanced Willesden Junction Station (including over-station development), and wayfinding. 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.

## KEY SITE ALLOCATIONS

Church End Growth Area

Argenta House

Unisys and Bridge Park


## RELEVANT POLICY DOCUMENTS

- Emerging Harlesden Neighbourhood Plan



## CHURCH END GROWTH AREA SITE ALLOCATIONS

### BSSA1: ASIATIC CARPETS

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Offices, warehouse and workshops</p>		
<p>Allocated Use</p>	<p>Mixed-use residential, employment and supporting community facilities</p>		
<p>Indicative Capacity</p>	<p>223</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
<p>Address</p>	<p>High Road, NW10 2DA</p>		
<p>Area</p>	<p>3.5 ha</p>		

Description of Existing Site	The site contains a large three storey warehouse, a three storey office building and Cygnus business park which comprises smaller one to two storey industrial units. There are large areas of underutilised space and storage. To the north and east the site is bounded by two storey terraced housing; the south modern apartment blocks and a large format retail unit and to the west residential and the magistrates court.
Ownership	Private
Planning History	Cygnus Business Centre 29, 30 and 31 Prior approval change of office use to residential (18/2278)
PTAL Rating	3/4
Planning Considerations	<p>Whilst the west of the site has been allocated for mixed-use light industrial/managed affordable workspace and residential since 2011, the west of the site is designated as a Locally Significant Industrial Site. Redevelopment will be consistent with London Plan policy E7 and Brent Local Plan policy BE2. It will be subject to a masterplan-led approach, demonstrating comprehensive development will result in a net increase in employment floorspace. It will result in development of a high quality design that effectively manages and mitigates any potential conflict between uses and a high standard of amenity achieved.</p> <p>The site is bounded by soft landscaping to the west, including a number of mature trees. The site itself comprises expanses of impermeable surfaces, which contributes to surface water flooding. There are areas surrounding the warehouse within flood zone 3a due to surface water flooding. A Flood Risk Assessment and appropriate mitigation will be required.</p> <p>The site has a PTAL of 3/4, but this could increase on implementation of the West London Orbital. The closest station is Neasden Station less than 400m away, and regular bus services stop on the site boundary.</p>
Risks	Impact on businesses. Prior approval changes of use prejudicing a comprehensive development.
Design Principles	<p>Development must be subject to a comprehensive masterplan-led approach. Piecemeal development which would prejudice the delivery of a wider masterplan will be refused. The masterplan must demonstrate a high quality of design, and that any potential conflicts between uses can be mitigated and a high standard of amenity achieved.</p> <p>Development should step down to residential development to the north and west. Appropriate heights and density will be determined through a masterplanning exercise.</p> <p>The warehouse currently presents a blank façade to housing on Chapel Close. To be sensitive to the adjoining residential, development should be set back from Chapel Close and provide an active frontage.</p> <p>Mature trees should be retained and soft landscaping reinforced. Sustainable Drainage Systems will be required to help mitigate surface water flooding.</p>
Infrastructure Requirements	The location of the health, community and enterprise hub will be determined through the masterplanning exercise.
Justification	<p>The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area further and its connectivity to Central London. Currently the site is underutilised. Given its accessibility and proximity to facilities at Church End Town Centre it is a sustainable location for higher density development.</p> <p>For development to be in conformity with London Plan policy, including the requirement for Brent to provide increased employment capacity, mixed-use development will be subject to a net increase in employment floorspace in addition to other criteria outlined in E7 and BE2.</p>

## BSSA2: HOMEBASE AND COBBOLD INDUSTRIAL ESTATE

Site Plan			
Existing Use	Retail, employment and housing		
Allocated Use	Housing, employment and supporting community facilities		
Indicative Capacity	160		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
			160



Address	Cobbold Road, NW10 9ST
Area	3 ha
Description of Existing Site	The site comprises a large retail unit and expanse of car parking. The 6 storey Moran House has been converted to housing with ground floor commercial. To the rear Cobbold Industrial Estate and Trojan Business Centre comprises predominantly one storey industrial units suitable for small businesses, with a number of larger three storey industrial units to the rear. To the east and west the site is bounded by two storey terraced housing; to the south the Grade II listed Willesden Jewish Cemetery and to the north the High Road and industrial uses.
Ownership	Public/Private.
Planning History	Prior approval Moran House office to residential (14/3519)
PTAL Rating	2/4 West London Orbital could uplift by 1
Planning Considerations	<p>The site is a designated Locally Significant Industrial Site. Consistent with London Plan policy E7 and Brent Local Plan policy BE2 redevelopment will be subject to a masterplan-led approach, demonstrating comprehensive development will result in a net increase in employment floorspace, development of a high quality design and that any potential conflict between uses can be managed and mitigated and a high standard of amenity achieved.</p> <p>The Jewish Cemetery to the south of the site is Grade II Listed.</p> <p>The site itself comprises expanses of impermeable surfaces, which contributes to surface water flooding. Parts of the road network are within flood zone 3a due to surface water flooding. A Flood Risk Assessment and appropriate mitigation will be required.</p> <p>The site has a PTAL of 2/4, but this could increase on implementation of the West London Orbital. The closest stations are Dollis Hill and Neasden Stations less than 500m away, and regular bus services run from the High Road.</p> <p>A number of mature trees are located along Cobbold Road and in the B&amp;M supermarket car park.</p>
Risks	Impact on businesses. Multiple ownership.
Design Principles	<p>Development must be subject to a comprehensive masterplan-led approach. Piecemeal development which would prejudice the delivery of a wider masterplan will be refused. The masterplan must demonstrate a high quality of design, and that any potential conflicts between uses can be mitigated and a high standard of amenity achieved.</p> <p>Development should step down to residential development to the east. Appropriate heights and density will be determined through a masterplanning exercise.</p> <p>Development should be sensitive to the setting of the Grade II Listed Jewish Cemetery. Heights will need to be informed by an assessment of impact on views from the cemetery.</p> <p>The development currently presents a blank wall along Cobbold Road. To be sensitive to the adjoining housing, development should be set back from Cobbold Road and provide an active frontage.</p>
Infrastructure Requirements	The location of the health, community and enterprise hub will be determined through the masterplanning exercise.
Justification	<p>The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area and its connectivity to Central London. Currently the site is underutilised. Given its accessibility and proximity to facilities at Church End Town Centre it is a sustainable location for higher density development.</p> <p>For development to be in conformity with London Plan policy, including the requirement for Brent to provide increased employment capacity, mixed-use development will be subject to a net increase in employment floorspace in addition to other criteria outlined in E7 and BE2.</p>


## BSSA3: CHAPMAN'S AND SAPCOTE INDUSTRIAL ESTATE



Existing Use	Warehouse and workshops		
Allocated Use	Mixed-use housing, employment and supporting community facilities		
Indicative Capacity	200		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
			200
Address	High Road, NW10 2DH		
Area	3.14ha		

Description of Existing Site	The site can be broadly broken down into four areas. Mp Moran and Sons which is open storage and a one storey building, currently in a poor condition. Sapcote Trading estate to the east which comprises one storey units largely occupied by vehicle repair premises. One storey garages fronting Colin Road in a range sizes. Chapman's Estate to the west comprises larger industrial units largely in use as wholesalers. To the north the site is bounded by two storey terraced housing with large gardens; to the west and south two storey terraces; and to the east commercial uses along Dudden Hill Lane.
Ownership	Private
Planning History	None relevant
PTAL Rating	4/5
Planning Considerations	<p>The site is a designated Locally Significant Industrial Site. Consistent with London Plan policy E7 and Brent Local Plan policy BE2 redevelopment will be subject to a masterplan-led approach, demonstrating comprehensive development will result in a net increase in employment floorspace, development of a high quality design and that any potential conflict between uses can be managed and mitigated and a high standard of amenity achieved.</p> <p>The site itself comprises expanses of impermeable surfaces and lacks soft landscaping, which contributes to surface water flooding. Parts of the road network and open storage are within flood zone 3a due to surface water flooding. A Flood Risk Assessment and appropriate mitigation will be required.</p> <p>The site has a PTAL of 4/5, but this could increase on implementation of the West London Orbital. Dollis Hill Station is less than 300m to the east, and Neasden Station less than 600m to the north. Regular bus services run from the High Road and Dudden Hill Lane.</p>
Risks	Impact on businesses. Multiple ownership.
Design Principles	<p>Development must be subject to a comprehensive masterplan-led approach. Piecemeal development which would prejudice the delivery of a wider masterplan will be refused. The masterplan must demonstrate a high quality of design, and that any potential conflicts between uses can be mitigated and a high standard of amenity achieved.</p> <p>The site is bounded by two storey housing. Development will need to be sensitive to impacting on the amenity of surrounding properties and step down to an appropriate scale. Appropriate heights and density will be determined through a masterplanning exercise.</p> <p>The development currently presents a blank frontage to Colin Road and Dudden Hill Lane, whilst vehicle repair businesses utilise Colin Road and contribute to a cluttered environment. There is an opportunity for development to significantly improve the quality of the environment by creating an active frontage.</p> <p>Development should increase soft landscaping and increase tree planting along Dudden Hill Lane.</p>
Infrastructure Requirements	The location of the health, community and enterprise hub will be determined through the masterplanning exercise.
Justification	<p>This site is currently of a low townscape quality. It presents a blank frontage on to Dudden Hill Lane which makes the area feel unsafe. Whilst garages to the south contribute to street clutter and congestion on Colin Road. There is an opportunity to improve the quality of the environment in this location through development.</p> <p>The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area and its connectivity to Central London. Currently the site is underutilised. Given its accessibility and proximity to facilities at Church End Town Centre it is a sustainable location for high density development.</p> <p>For development to be in conformity with London Plan policy, including the requirement for Brent to provide increased employment capacity, mixed-use development will be subject to a net increase in employment floorspace in addition to other criteria outlined in E7 and BE2.</p>

## BSSA4: DUDDEN HILL COMMUNITY CENTRE

<p>Site Plan</p>	 <p>© Crown copyright and database rights 2018 Ordnance Survey 100025946</p>
<p>Existing Use</p>	<p>Community hall, games court, playground.</p>
<p>Allocated Use</p>	<p>Housing, re-provision of community centre, games court and playground.</p>
<p>Indicative Capacity</p>	<p>25</p>

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
			25
Address	Dudden Hill Centre, 19 Dudden Hill Lane, NW10 2ET		
Area	0.17 ha		
Description of Existing Site	The site currently contains a community centre, games court and playground which is in a poor condition. The site fronts Dudden Hill Lane with residential terraces to the east, many of which have commercial frontages. The rear of the site backs onto residential gardens with the community centre itself backing directly onto the rear infill extension of 100/102 Chaplin Road. Immediately to the east of the site is 2/3.5 storey residential terrace housing with commercial frontages. The site sits close to the intersection of Dudden Hill Lane and Willesden High Road.		
Ownership	Public		
Planning History	n/a		
PTAL Rating	5		
Planning Considerations	<p>The site is located within an Air Quality Management Area.</p> <p>The site has had no historical industrial use.</p> <p>The adjacent Dudden Hill Lane is designated flood zone 3a (surface water). Development should be designed to be resilient and resistance to flooding adjacent the site.</p> <p>The site is accessible via Dudden Hill Lane. The high PTAL can be associated with the proximity to both Dollis Hill train station and numerous bus services which are all within a 5 minute walk of the site.</p>		
Risks	Temporary loss of community facilities during construction.		
Design Principles	The development's design should be sympathetic to the adjacent two storey terraced housing to the west. Given the location of the plot, proposals should consider creating an active frontage at ground floor. In front of the plot there are several trees which should be retained, along with the enhancement of the public realm.		
Infrastructure Requirements	Reprovision of existing community centre and play facilities.		
Justification	The building, outdoor sports court and playground are in a poor condition. Redevelopment for mixed-use development including residential would enable the delivery of new community facilities of a higher standard. The high PTAL rating of this site and its proximity to Willesden Green Town Centre make it a sustainable location for residential.		

## BSSA5: MCGOVERN'S YARD

<p>Site Plan</p>	 <p>© Crown copyright and database rights 2018 Ordnance Survey 100035265</p>
<p>Existing Use</p>	<p>Light industry</p>
<p>Allocated Use</p>	<p>Residential and employment</p>
<p>Indicative Capacity</p>	<p>150</p>

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
			75
Address	25 Colin Road, London, NW10 2EE.		
Area	0.4 ha		
Description of Existing Site	Large storage depot with an opening onto both Colin Road and Dudden Hill Road. The depot is surrounded on three sides by terrace housing and by commercial units along Dudden Hill Lane. The section of the plot which stretches onto the High Road is a small terrace house. There is also a larger section stretching onto Meyrick road which is a large 2 storey shingle terrace house. The section on Dudden Hill Lane comprises a car tinting business and an opening to McGovern's Yard. The primary access point for McGovern's yard is via Colin Road. The depot itself consists of a warehouse with loading bays and a yard.		
Ownership	Private		
Planning History	Erection of second floor extension for office use, 1989.		
PTAL Rating	5		
Planning Considerations	<p>The site is currently in employment use. Consistent with policy BE3 mixed-use development will only be acceptable where an increase in the amount of employment floorspace on the site and workspace accommodates the existing employment use or is provided as managed affordable workspace.</p> <p>There is one small tree present along Dudden Hill Lane.</p> <p>The site is located within an Air Quality Management Area.</p> <p>The site has a history of industrial use and is currently a depot. In this case testing for contamination should be undertaken along with any necessary remediation works.</p> <p>Although the site is not within a flood zone, the adjacent Dudden Hill Lane and the High Road are designated Flood Zone 3a due to surface water flooding. Development should be designed to mitigate any risk of flooding from the surrounding road network by incorporating Sustainable Drainage Systems and green infrastructure.</p> <p>With a PTAL of 5, the site is located within a 5 minute walk of Dollis Hill underground station and numerous bus services.</p>		
Risks	Impact on businesses during redevelopment.		
Design Principles	<p>The development will be nestled within a surround of terrace housing and should therefore be sensitive toward existing local residents in scale and layout.</p> <p>Proposals should aim to increase the levels of greenery within the area with the addition of trees and landscaping. Commercial frontages should be provided along Dudden Hill Lane with residential entrances being provided via Colin Road, Meyrick road and the High Road.</p>		
Infrastructure Requirements			
Justification	<p>The site is currently occupied by low-density employment uses and underutilised. Re-provision of workspace as part of a mixed-use development is required to mitigate against loss of employment space, in line with emerging London Plan policy which requires Brent to provide additional capacity.</p> <p>The depot is currently in direct proximity to residential housing. Redevelopment for mixed-use development could be more sympathetic to the surrounding context and result in regeneration benefits.</p> <p>There is a high PTAL in the area which would allow development without any necessary parking provision. The surrounding area has virtually no greenery and would benefit greatly from some general landscaping and the introduction of trees.</p>		

## BSSA6: BARRY'S GARAGE

<p>Site Plan</p>	 <p><small>© Crown copyright and database rights 2018 Ordnance Survey 100025268</small></p>		
<p>Existing Use</p>	<p>Vehicle repair garage, commercial uses, residential, a church and nursery.</p>		
<p>Allocated Use</p>	<p>Residential, affordable workspace and community space</p>		
<p>Indicative Capacity</p>	<p>37</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
		<p>37</p>	




Address	1 Glebe Road, Willesden Green, NW10 2JD
Area	0.4ha
Description of Existing Site	The site currently comprises a vehicle repair garage. To the east the site contains a parade of commercial uses with residential above, and a building in operation as a church and nursery. The Willesden Jewish Cemetery is located to the south of the site, and to the east the site is bounded by two storey residential development.
Ownership	Private/Public Ownership
Planning History	Extension and alterations to garage building in 1992 and 2004.
PTAL Rating	PTAL 5 (currently and to 2031)
Planning Considerations	<p>The site contains the locally listed Willesden Seventh-Day Adventist Church (former Pound Infant School). Furthermore, the parade alongside contains a former constitutional club (375 High Road) which has been identified as having architectural and historic interest as well as the Willesden Deeper Life Christian Centre (344 High Road), a single storey ragstone chapel. These should be treated as non-designated heritage assets in the surrounding area which make a positive contribution to local character. To the south of the site is the Grade II Listed Willesden Jewish Cemetery. This has recently been awarded Heritage Lottery Funding to restore key features and open a visitor centre. There are views from the site into the Jewish Cemetery from upper floors.</p> <p>The site is accessible via Glebe Road and pedestrian access via High Road. It is well served by public transport. Regular bus services operate from the High Road and Pound Lane, and Dollis Hill Tube Station on the Jubilee Line is less than a 10 minute walk away.</p> <p>Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment and appropriate remediation will be required.</p> <p>Part of the site falls within flood zone 3a and 3b due to surface water flooding. A Flood Risk Assessment will be required.</p>
Risks	The multiple ownership of the site is a risk to delivery.
Design Principles	<p>Comprehensive redevelopment of the site is sought. However, there is potential for the Barry's Garage Site to come forward as an initial phase providing through a masterplanning approach it is demonstrated this wouldn't prejudice the delivery of a wider scheme.</p> <p>Development should also take account of the surrounding heritage assets and the effect on their special architectural and historic interest. A heritage statement will be necessary. Development should be reflective of the predominant character of the area, which is two to three storeys in height. Taller, well-designed buildings, may be appropriate where they complement the setting of the listed cemetery as well as the general streetscene.</p> <p>The development should take influence from the positive characteristics of the surrounding buildings and structures. In particular, the retention of the Willesden Seventh-Day Adventist Church building and the former constitutional club is encouraged.</p>
Infrastructure Requirements	No site specific infrastructure requirements, beyond the re-provision of community facilities and employment space.
Justification	<p>The site is located in an area of high public transport accessibility with good access to local services, making it a sustainable location for residential development. There is an opportunity to enhance the character of the area, including the setting of the Grade II listed cemetery and optimise the use of the site through a mixed-use development comprising residential and affordable workspace.</p> <p>Re-provision of workspace is required to mitigate for the loss of employment space, in line with emerging London Plan policy which requires no net loss of employment floorspace and also for Brent to provide additional capacity. Willesden High Road has an existing cluster of workspace and has been identified as an area of demand for additional workspace.</p> <p>Re-provision of community facilities, including the church, nursery and meeting space, is required to ensure there is sufficient capacity for existing and new community.</p>

## BSSA7: WILLESDEN BUS DEPOT

<p>Site Plan</p>	 <p><small>© Crown Copyright and database rights 2018 Ordnance Survey 100025260</small></p>		
<p>Existing Use</p>	<p>Transport for London Bus Depot</p>		
<p>Allocated Use</p>	<p>Re-provision of bus depot with residential uses above.</p>		
<p>Indicative Capacity</p>	<p>60</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>0</p>	<p>30</p>	<p>30</p>
<p>Address</p>	<p>Willesden Bus Depot, High Road, Willesden Green, NW10 2JY</p>		
<p>Area</p>	<p>0.7ha</p>		


Description of Existing Site	<p>The site comprises a Transport for London Bus Depot. To the north and east the site is bounded by buildings ranging from two to four storeys in height. These comprise residential units with commercial ground floor uses fronting Willesden High Road. Willesden Jewish Cemetery is located to the west of the site, and to the south a terrace of two storey housing.</p> <p>The site adjoins a warehouse and buildings with permission for mixed-use residential and commercial development.</p>
Ownership	Public Sector Ownership
Planning History	<p>There is no relevant planning history for the bus depot itself, but the adjoining warehouse and units have planning permission for redevelopment. Prior approval granted to convert adjoining warehouse on 291 High Road to residential. (16/2689). Planning permission for residential with commercial unit at ground floor on 295-197 High Road. (12/1685)</p>
PTAL Rating	PTAL 5 to 6 (currently and to 2031)
Planning Considerations	<p>The site itself includes an Edwardian entrance incorporating a war memorial. To the west of the site is the Grade II Listed Willesden Jewish Cemetery. This has recently been awarded Heritage Lottery Funding to restore key features and open a visitor's centre. There are views from the site into the Jewish Cemetery from upper floors. The locally listed Willesden Seventh-Day Adventist Church is located to the north east of the site. There are also a number of non-designated heritage assets in the surrounding area which make a positive contribution to local character, including Willesden Deeper Life Christian Centre (344 High Road) a single storey ragstone chapel, The Crown Public House (335 High Road) and No.8 Public House (305 High Road).</p> <p>The site is accessible via Pound Lane and from the High Road via Churchmead Road. It is well served by public transport. Regular bus services operate from the High Road and Pound Lane, and Dollis Hill Tube Station on the Jubilee Line is less than a 10 minute walk away.</p> <p>Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation.</p> <p>Part of the site falls within flood zone 3a due to surface water flooding. A Flood Risk Assessment will be required.</p> <p>There are four mature trees located along the northern and eastern boundary of the site.</p>
Risks	<p>The operational requirements of the bus depot are a risk to the delivery of the site. Construction works will need to be carefully co-ordinated with Transport for London.</p>
Design Principles	<p>Development should be reflective of the predominant character of the area, which is two to four storeys in height. Development should step down towards the two storey terraced housing to the south, whilst there are opportunities for taller five storey elements fronting the High Road and Pound Lane. Development should also take account of the surrounding heritage assets and the effect on their special architectural and historic interest. A heritage statement will be necessary and although the site has potential for taller, well-designed buildings, this will need to take account of the setting of the listed cemetery as well as the general streetscene.</p> <p>The development should take influence from the positive characteristics of the surrounding buildings and structures. In particular the retention and consideration of the Edwardian Bus Depot entrance and war memorial is encouraged.</p> <p>Tree planting along the northern and eastern boundary of the site should be retained and reinforced.</p>
Infrastructure Requirements	<p>No site specific infrastructure requirements, beyond retention of the bus depot and associated vehicular access.</p>
Justification	<p>The site is located in an area of high public transport accessibility with good access to local services, making it a sustainable location for residential development. There is an opportunity to enhance the character of the area, including the setting of the Grade II listed cemetery and optimise the use of the site through a mixed-use development comprising residential and a re-provided bus depot.</p>

## BSSA8: ARGENTA HOUSE AND WEMBLEY POINT

<p>Site Plan</p>			
Existing Use	Light industrial		
Allocated Use	Residential and affordable workspace		
Indicative Capacity	100		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	100	0
Address	Argenta Way, NW10 0AZ		

Area	0.15 ha
Description of Existing Site	The site is occupied by a two storey light industrial building which houses a silversmith and kiosk selling food and drink. Wembley Brook intersects the site. The brook is in a concrete channel which connects to the River Brent via a culvert. To the north west the site is bounded by two storey housing; to the east Wembley Point, an office building with prior approval for conversion to residential, and associated car parking; to the south the North Circular Road; and to the west Stonebridge Park Station and associated railway lines.
Ownership	Private
Planning History	None
PTAL Rating	PTAL 4
Planning Considerations	<p>The site is directly adjacent the North Circular Road, a major source of air and noise pollution.</p> <p>Wembley Brook and River Brent are potential sources of flooding and the majority of the site is within Flood Zone 2 and 3. Recent modelling has demonstrated the site is outside of flood zone 3b (functional floodplain). The area is heavily built up. Lack of landscaping, large expanses of car parking and the North Circular Road contribute to low permeability and accumulated surface water build up.</p> <p>The railway trackside and Wembley Brook adjacent the site forms part of a wildlife corridor and Grade I Site of Importance for Nature Conservation. There is an opportunity to help reinforce the wildlife corridor through soft landscaping to the site.</p> <p>The site has a PTAL of 4 being directly adjacent the Stonebridge Park Station and a bus stop.</p> <p>Due to its current and historic industrial use there is potential for contamination and a preliminary risk assessment will be required, and if necessary site investigations.</p> <p>The site contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit.</p>
Risks	Flood risk.
Design Principles	<p>The site is in a prominent location, highly visible from the North Circular and Stonebridge Park Station. Given its prominence the highest architectural quality will be required.</p> <p>A cluster of taller buildings are located in this location, including the 7 storey Unisys buildings and 21 storey Wembley Point building. However, to the north the site is bounded by two-storey housing. The scale and layout must mediate between Wembley Point and surrounding low-rise and mitigate any potential impacts, including overshadowing. It is considered that this area is suitable for a tall building, subject to it being a high quality design that is complementary to the scale provided by Wembley Point.</p> <p>Development must be informed by a detail Flood Risk Assessment and Drainage Strategy. Through works to the Wembley Brook proposals should seek to reduce flood risk overall and not increase the risk of flooding on adjoining sites, including Wembley Point. The Wembley Brook should become a feature which contributes to the character of the site and provides natural Sustainable Urban Drainage. Subject to the recommendations of the Flood Risk Assessment, proposals should seek to naturalise the Wembley Brook to improve its ecological and landscape value. Tree planting and soft landscaping will be required to mitigate air quality impacts from the North Circular and increase permeability.</p>
Infrastructure Requirements	Flood mitigation
Justification	<p>The site benefits from good public transport access with a PTAL rating of 4. In its current state the site is of a poor environmental quality, with dated buildings. Redevelopment would improve the environmental quality of the area, help reduce flood risk and create an attractive gateway to the borough and Stonebridge.</p> <p>Draft London Plan policy requires Brent to provide additional employment floorspace capacity. Consistent with this Brent's Local Plan policies allow redevelopment of Local Employment Sites such as Argenta House, subject to re-provision of employment floorspace as affordable workspace. There should be no net loss of employment floorspace.</p>

## BSSA9: BRIDGE PARK AND UNISYS BUILDING

<p>Site Plan</p>			
Existing Use	Leisure centre, vacant office buildings, community and commercial uses.		
Allocated Use	New leisure centre, hotel, office, residential.		
Indicative Capacity	505		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	150	275	80
Address	Brentfield, Stonebridge, London, NW10 0RG.		
Area	2.7 ha		
Description of Existing Site	<p>Bounded on the north by Brentfield Road, the east by residential units, south by railway tracks and the west by the North Circular Road. The site is occupied by the Bridge Park Community Leisure Centre, the vacant Unisys buildings, offices, a nursery and religious venue and car parking. The Unisys buildings were once office blocks but have been vacant for around 17 years. The leisure centre, constructed in the 1980s is in need of modernising. There is also a car breakers site in the southern most corner of the site which contributes to the site's neglected feel.</p>		

Ownership	Leisure centre and nursery are public, the rest is private.
Planning History	None relevant
PTAL Rating	PTAL 3 and 4
Planning Considerations	<p>The provision of a new leisure centre on the site is required to meet the need for indoor sports facilities in the borough.</p> <p>The railway tracks to the south of the site are designated as a Wildlife Corridor and the trackside to the north of the tracks is a Grade I Site of Importance for Nature Conservation (SINC) (Harlesden to Wembley Central including Wembley Brook). Development of the site should seek to protect and enhance these sites. There are numerous trees which align the front of the site and currently form the perimeter of the leisure centre's car park, all of which should be retained if possible.</p> <p>As with the majority of Brent the site is located within an Air Quality Management Area (AQMA). The adjacent North Circular Road is a major source of air and noise pollution.</p> <p>The east section of the site, which is currently occupied by both the leisure centre and the former Sperry Univac building, was previously a bus station and therefore has historical industrial use. In this case contamination testing should be undertaken along with any necessary remediation works.</p> <p>The whole site designated as Flood Zone 3a (surface water) and large expanses designated as Flood Zone 3a (fluvial and tidal). The fluvial and tidal flooding concerns are due to the proximity to Brent river and its tributary Wembley Brook. This is further exacerbated by the low permeability of the area which is also why the area is considered a surface water flood risk. The area is heavily built up with the North Circular Road and its junction with the A404, Stonebridge Park Station and numerous industrial areas all contributing to low permeability and accumulated surface water build up. It must be demonstrated that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction.</p> <p>With a PTAL of 4/3, the site is located within a 6 minute walk of Stonebridge Park Station, which is served by the overground and underground and within a 5 minute walk of 3 bus stops, each serviced by one bus.</p>
Risks	Procurement of car breakers site and need to manage relocation of businesses during redevelopment. Flood risk.
Design Principles	<p>A cluster of taller buildings is located on the western edge of the site, including the 8 storey Unisys buildings and, on the other side of the North Circular, the 21 storey Wembley Point building. In this context higher density development of is appropriate, subject to being of high architectural quality and providing a high standard of amenity. Development will need to step down to the south eastern border where the site currently backs onto 2 storey residential housing on First Drive. Overshadowing will be a key consideration.</p> <p>The layout of development will need to be informed by flood risk management and reduction, directing development to the areas at lower flood risk. Incorporating the theme of flooding mitigation, the site's landscape should be enhanced, increasing greenery, and in the process, permeability.</p>
Infrastructure Requirements	<p>Improvements to the bus network may be required to increase PTAL and enable car free or car light residential development.</p> <p>Sustainable Urban Drainage Systems (SUDS) and flood mitigation will be required informed by the Flood Risk Assessment and Drainage Strategy.</p>
Justification	<p>The site benefits from good public transport access with a PTAL rating of both 3 and 4. In its current state the site is of a poor environmental quality, with dated buildings and the long-term vacant Unisys buildings. It contrasts with the attractive environment created elsewhere in Stonebridge through modern development. Redevelopment would improve the environmental quality of the area and create an attractive gateway to the borough and Stonebridge. Comprehensive mixed-use development is needed to help facilitate a new leisure centre and to bring the Unisys buildings back in use. This site and the surrounding area would benefit greatly from redevelopment in terms of flood mitigation.</p>

## BSSA10: EURO CAR RENTAL

Site Plan



Existing Use	Car rental		
Allocated Use	Housing		
Indicative Capacity	25		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		10	15
Address	Vanguard Rental, 101 Brentfield Road, Stonebridge, London, NW10 8LD		



Area	0.5 ha
Description of Existing Site	The site is accessible via Brentfield Road. The front of the site (east) consists of a small car park with two single storey office buildings and several advertising billboards. The rear of the site consists of a large car park for the storage of rental cars. To the north of the site sits the BAPS Shri Swaminarayan-Mandir temple, commonly referred to as Neasden Temple. The south of the site is outlined by a small canal feeder waterway which backs onto residential gardens, with the west sharing a small boarder with the playing field of Brentfield Primary School.
Ownership	Private
Planning History	Installation of underground petrol tank, 1988 (88/2052). Demolition of existing buildings and erection of single storey office and van wash facility, including associated hard landscaping (spread over 3 amended applications), 1998/2000. (98/1380)
PTAL Rating	1b/2
Planning Considerations	<p>There are no listed heritage sites on the plot, however, the neighbouring Swaminarayan-Mandir Temple to the north is a non-designated heritage asset and local landmark which should not be obscured.</p> <p>The adjacent canal feeder to the south is designated a Grade II Site of Interest for Nature Conservation (SINC) and a wildlife corridor. The site falls within an area designated as a waterside development area and development should therefore contribute to improving water quality through naturalisation and green sustainable drainage systems. Consideration should be taken with regards to the ecological and aesthetic potential of the canal feeder, maximising its utility in both respects. There are three trees on the western most border which overhang into the site.</p> <p>Sections of the site are designated as Flood Zone 3a due to the risk of surface water flooding. A Flood Risk Assessment and appropriate mitigation required.</p> <p>As with the majority of Brent the site is located within an Air Quality Management Area (AQMA).</p> <p>The site is currently a car rental facility and has therefore had historical industrial use. In this case testing for contamination should be undertaken along with any necessary remediation works.</p> <p>The site has a PTAL rating of 1b/2 and is serviced by 3 bus stops within a 6 minute walk.</p>
Risks	Congestion on Brentfield road during construction.
Design Principles	<p>Development must reflect the predominantly low rise character of the area and respect the setting of Neasden Temple. Development should be set back from the road to protect views to the temple from Brentfield Road and the surrounding area.</p> <p>The canal is important for wildlife and therefore attempts to enhance and incorporate nature into the development will be encouraged.</p> <p>Development should incorporate planting along its southern boundary and green sustainable drainage systems. This will provide multiple benefits including improving water quality, supporting biodiversity and flood risk mitigation.</p>
Infrastructure Requirements	Low PTAL suggests public transport enhancements or parking will be required.
Justification	<p>The existing usage of the site as a car rental company is not complementary to the surrounding area, with particular respect toward the adjacent temple. Hoardings create a cluttered appearance along Brentfield Road and detract from views to temple. Residential will be more consistent with the character of the surrounding area.</p> <p>As a waterside development area the site has much greater potential for increasing residents' interactions with nature as opposed to its current fenced off approach.</p>

FIGURE 24 OTHER SITE ALLOCATIONS

REF.	SITE NAME	ADDRESS	SIZE (HA)	EXISTING USE	ALLOCATED USE	INDICATIVE HOUSING CAPACITY	COMMENTS
BSSA11	296-300 High Road	296-300 High Road, Willesden, NW10 2EN	0.09	Commercial, community, public space containing artwork	Mixed-use	5	Public square and artwork to be retained and enhanced
BSSA12	Learie Constantine Centre	43-47 Dudden Hill Lane, London, NW10 2ET	0.03	Community	Mixed-use	15	Community centre to be reprovided
BSSA13	Morland Gardens	Morland Gardens, NW10 8DY	0.3	College	Residential	60	
BSSA14	Harlesden Station Junction	128 Acton Lane, NW10 8UP	0.06	Commercial	Mixed-use residential and commercial. Potential for self or custom-build	3	Enhance the setting of Harlesden Station and improve connectivity to Harlesden Town Centre
BSSA15	Mordaunt Road	Mordaunt Road, NW10 8NU	0.1	Commercial and residential	Mixed-use residential and commercial. Potential for self or custom-build	8	Enhance the setting of Harlesden Station and improve connectivity to Harlesden Town Centre
BSSA16	Harlesden Railway Generation Station	Acton Lane, NW10 8UR	0.21	Workspace and substation	Workspace	0	Enhance the setting of Harlesden Station and improve connectivity to Harlesden Town Centre
BSSA17	Harlesden Telephone Exchange	Avenue Road, NW10 4UG	0.39	Telephone Exchange building	Mixed-use residential and commercial	52	
BSSA18	Craven Park Roundabout	1 Craven Park, NW10 8QE	0.08	Vacant	Mixed-use residential and commercial. Potential for self or custom-build	3	
BSSA19	Chancel House	Chancel House, Neasden Lane, NW10 2UF	0.8	Offices	Secondary School	0	
	Harley Road	Harley Road, NW10 8BB	0.08	Signal Station	Residential. Potential for self or custom-build	7	See Harlesden Neighbourhood Plan

	Car sales at junction of High Street and Furness Road	Furness Road, NW10 4TE	0.08	Commercial	Residential. Potential for self or custom-build	5	See Harlesden Neighbourhood Plan
	Former Willesden Ambulance Station	164 Harlesden Road, NW10 3SF	0.07	Vacant	Residential. Potential for self or custom-build	8	See Harlesden Neighbourhood Plan
	Land at Challenge Close	50-70 Craven Park Road, NW10 4AE	0.19	Commercial	Residential. Potential for self or custom-build	10	See Harlesden Neighbourhood Plan
	Salvation Army and Manor Park Works	Manor Park Road, NW10 4JJ	0.19	Warehouse and Community Space	Residential	31	See Harlesden Neighbourhood Plan
	Harlesden Plaza	Tavistock Road, NW10 4NG	0.9	Retail and car parking	Residential	208	See Harlesden Neighbourhood Plan

FIGURE 25 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

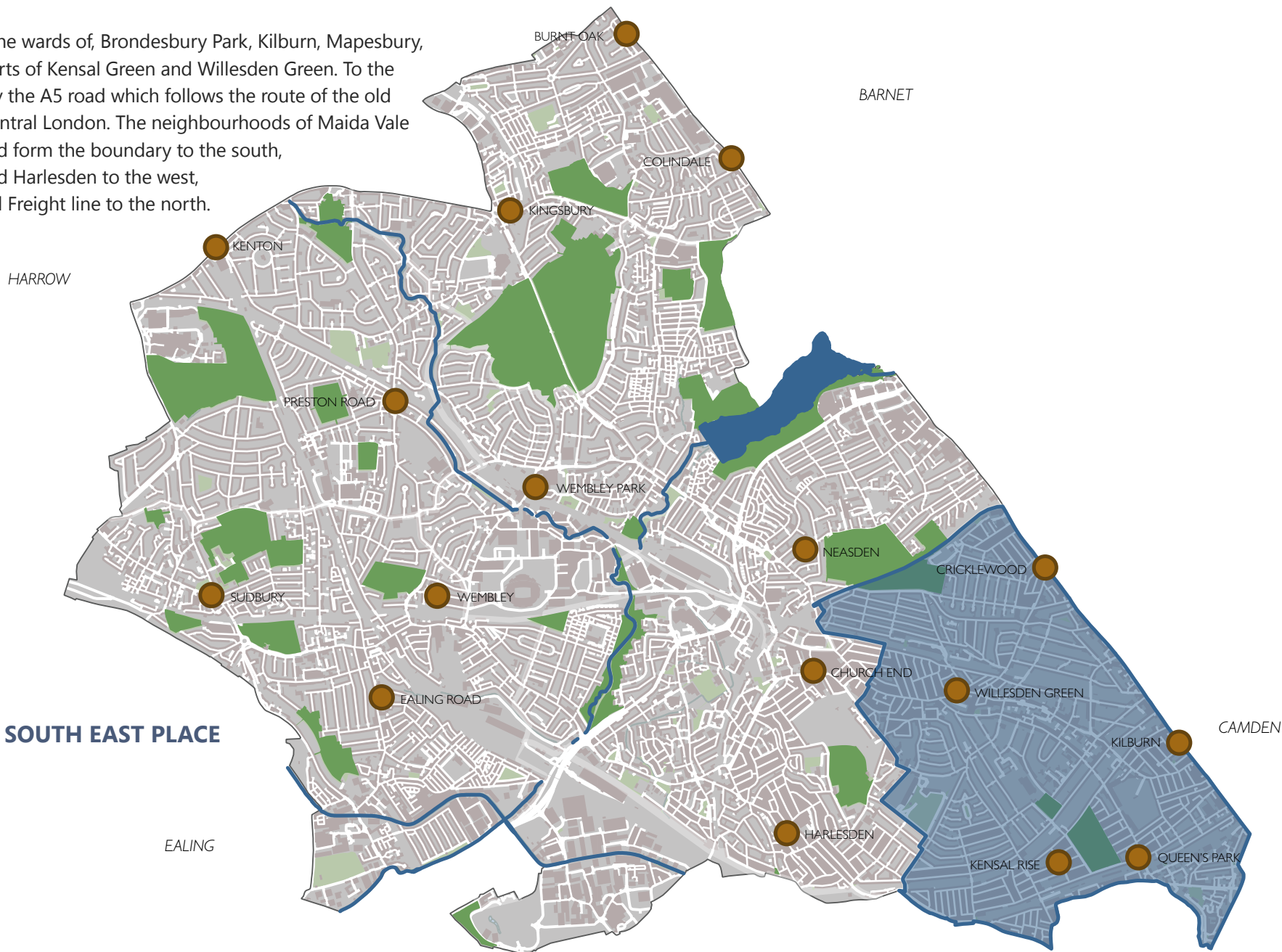
SITE NAME	ADDRESS	SIZE (HA)	EXISTING USE	ALLOCATED USE	INDICATIVE HOUSING CAPACITY	REFERENCE NO.
Stonebridge School and Former Day Centre	Shakespeare Avenue, NW10 8NG	0.61	School and former day centre	Mixed-use extension to school, residential, enhanced open space with play	51	16/0077
Stonebridge Primary School Annexe	Twybridge Way, NW10 0ST	0.61	Primary School Annexe	Residential	55	16/0073
Winchelsea Road	Winchelsea Road, NW10 8UN	1.05	Christian Centre and adjacent land	Residential and community space	178	16/0760
Former Craven Park Health Centre	Knatchbull Road, NW10 8GR	0.58	Former health centre	Residential and community space	109	15/0822
Knowles House	Longstone Avenue, NW10 3UN	0.48	Hostel	Residential (supported living) and community space	92	17/2516
Church End Local Centre	205 Church Road, and Eric Road NW10 9EP	0.31	Residential, commercial and car parking	Residential and new market	34	13/1098
235 and Land in Church Road Car Park	205-235 Church Road	0.31	Residential, commercial and car parking	Residential and retail	65	13/2213

## 5.6 SOUTH EAST



## SOUTH EAST

**5.6.1** This place includes the wards of, Brondesbury Park, Kilburn, Mapesbury, Queen's Park and parts of Kensal Green and Willesden Green. To the east it is bounded by the A5 road which follows the route of the old Roman Road into Central London. The neighbourhoods of Maida Vale and West Hampstead form the boundary to the south, Roundwood Park and Harlesden to the west, and the Dudding Hill Freight line to the north.



**FIGURE 26 MAP OF SOUTH EAST PLACE**

## CHARACTER AND CULTURE

- 5.6.2** The South East of the borough comprises largely residential neighbourhoods focussed around town centres, and with eight conservation areas has a strong sense of character. To the south Brondesbury, Queen's Park, Willesden and Kilburn are characterised by Victorian Terraces. Further north Cricklewood and Mapesbury are characterised by suburban houses with large gardens and turn of the century town houses. In contrast South Kilburn Estate is an area in transition, and comprises a mix of older residential concrete towers and contemporary apartments.
- 5.6.3** There are many notable cultural and heritage assets including the Kiln Theatre in Kilburn, which has transferred multiple productions to the West End; The Lexi independent cinema; the Grade II listed Tin Tabernacle originally built in 1863 as a church, formerly home to the Sea Cadets and now a community venue; and the Gaumont State Cinema a Grade II\* listed Art Deco building which when first built was one of the largest cinemas in Europe; The Granville Centre and South Kilburn Studios which provide community and workspace; and Willesden Green Library a modern library which includes performance, community and exhibition space and is home to Brent Museum.

## TOWN CENTRES

- 5.6.4** This place benefits from good access to shops and services. Queen's Park, Willesden Green and Kensal Rise are characterised by independent shops, cafes and restaurants. Cricklewood and Kilburn High Road have an offer which reflects their diverse communities, with restaurants serving food from all around the world. Kilburn High Road has a lively night time offer including bars, restaurants and the Kiln Theatre and cinema.
- 5.6.5** Employment and Education
- 5.6.6** Although there are no designated employment sites here, there is a strong entrepreneurial culture with the highest proportion of micro businesses (with less than 9 employees), home working and self-employment in the borough. Creative businesses are clustered in Queen's Park Creative Quarter, Kilburn High Road and increasingly at Willesden Green. Employment is concentrated in ICT, media, creative services, professional and financial services.

## OPEN SPACE AND BIODIVERSITY

- 5.6.7** Significant open spaces include Queen's Park, Paddington Cemetery, part of Gladstone Park and the recently completed Woodhouse Park. Smaller open spaces and pocket parks, such as Mapesbury Dell and Rainbow Park are also



distributed across this place. Cricket, football and rugby sports pitches are concentrated at Gladstone Park and King Edward Recreation Ground. King Edward Recreation Ground has recently been improved.

## TRANSPORT

- 5.6.8** This area has long been a convenient commuter location for Central London. Railway stations first opened in Kilburn and Brondesbury in the mid-1800s, followed by the Metropolitan Railway in the late 1800s. Today it is served by the Metropolitan Line, Overground and the Jubilee Line, which is now part of the night tube.
- 5.6.9** Orbital travel is reliant on the bus network, which due to road congestion is less reliable. In particular the A5 is a congested route into Central London.
- 5.6.10** The majority of cycle and walking routes in this place are on road. Exceptions include sections of the recently completed cycling quietway 3, which connects Gladstone Park to Regents Park via Willesden and Kilburn. Brent's first segregated cycle route has also been introduced in the South Kilburn Growth Area. The Brent Long Term Transport Strategy identifies the potential to improve cycle connections within this place with additional routes from Kilburn and Kensal Rise to Church End via Willesden Green.

CHALLENGES	OPPORTUNITIES
<ul style="list-style-type: none"> <li>• <b>Although generally an affluent place there are areas of deprivation particularly in South Kilburn, parts of which in 2015 were in the top 10% of most deprived areas in the country. Linked to this parts of Kilburn experience amongst the lowest levels of reported good health in the borough.</b></li> <li>• <b>Whilst the east of Willesden Green Town Centre is performing well the west towards Dollis Hill Station experiences high levels of vacancy and a low quality environment.</b></li> <li>• <b>The Brent Cross extension could impact on trade to Kilburn and Cricklewood Town Centres.</b></li> <li>• <b>Although generally well served by high quality open spaces there are areas of open space deficiency to the north of this place.</b></li> <li>• <b>Orbital transport links are reliant on buses and therefore less reliable.</b></li> <li>• <b>High volumes of traffic on the A5 impact on the quality of the environment, including air quality and noise.</b></li> <li>• <b>Hassop Road to the rear of Cricklewood Town Centre contains a concentration of vehicle repair centres, which impact on the amenity of neighbouring residential units.</b></li> <li>• <b>Some of the playing pitches at Gladstone Park are in need of improvement.</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Continue the regeneration of South Kilburn Estate to create an environment which provides for a better quality of life.</b></li> <li>• <b>Kilburn Town Centre is a well performing centre with a strong convenience retail goods offer. It has scope to further improve its comparison retail offer. The introduction of the night tube could be a catalyst to further enhance Kilburn's existing night time and cultural offer.</b></li> <li>• <b>Cricklewood, Queen's Park and Kensal Rise Town Centres provide convenience retail and a restaurant offer which could be further enhanced.</b></li> <li>• <b>The quality of environment to the west of Willesden Green Town Centre could be improved through redevelopment.</b></li> <li>• <b>Support and enhance clusters of creative industries in Queen's Park, Willesden Green and Kilburn to establish Creative Quarters and help meet demand for incubators, accelerators and co-working space. Consider the potential for these clusters to be future Creative Enterprise Zones, a designation by the Mayor of London which recognises an area's contribution to supporting creative activity, including artists and creative businesses.</b></li> <li>• <b>Open spaces could be enhanced using Community Infrastructure Levy and other sources of funding to help address deficiency.</b></li> <li>• <b>Creation of a West London Orbital passenger route on the Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to the proposed Brent Cross Thameslink station (Midland Main Line).</b></li> <li>• <b>Ensure development supports public realm improvements along the A5 to reduce traffic dominance and enhances this important gateway into the borough and Central London.</b></li> <li>• <b>The proposed Kensal Canalside development of 3,500 new homes and other uses in the adjacent Royal Borough of Kensington and Chelsea lies to the south of this Place</b></li> </ul>

**FIGURE 27 HIGH LEVEL PLAN OF THE PLACE**





## VISION

**5.6.11** A place which celebrates its historic character and cultural attractions, where creative industries can flourish. A series of attractive green neighbourhoods focussed around vibrant town centres of Cricklewood, Queen's Park, Willesden Green and Kilburn. Kilburn Town Centre will be a bustling night time destination, with a new market square where the community can come together. South Kilburn Growth Area's transformation will continue to create a mixed neighbourhood with affordable housing, good access to services, new community space, an enterprise hub and high quality open spaces.

## PREFERRED POLICY OPTION POLICY BP6 SOUTH EAST

**Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:**

### CHARACTER, HERITAGE AND DESIGN

Strengthen local identity and character by:

- a. **Conserving and enhancing heritage assets, including reviewing and extending conservation area boundaries and producing Conservation Area Design Guides.**
- b. **The character of the A5 corridor will be enhanced and the Victorian terraces which characterise Cricklewood Town Centre protected. Redevelopment of infill sites which are not in keeping with the character of the terraces will be supported where development is consistent with the building line, height and proportions of adjoining 3 storey buildings and of a high quality which complements local character.**
- c. **Tall buildings not being appropriate within this place with the exception of South Kilburn Growth Area, where consistent with the South Kilburn Masterplan and the intensification corridors of A407 High Road and A4003 Willesden Lane and parts of town centres where up to 15-18 metres (5-6 storeys) could be appropriate. In other areas which are not conservation areas heights of buildings should go no higher than two storeys above the prevailing heights.**

### HOMES

- d. **South Kilburn Growth Area will deliver 2,800 new high quality homes, with a target of 50% affordable including 1,200 social rented for existing**

**secure tenants of South Kilburn.**

- e. **Kilburn Square as part of a mixed-use development including re-provision of the market and a new public square**
- f. **The comprehensive redevelopment of Cricklewood Broadway Retail Park for mixed-use development including residential will be supported.**
- g. **Redevelopment of identified sites in Cricklewood and Willesden Green Town centres will be supported where development is of a high design quality and makes a positive contribution to the character of the conservation area.**
- h. **Diversification to uses including residential and employment on the intensification corridor to the west of Willesden Green town centre will be encouraged with further residential supported along other intensification corridors..**

### TOWN CENTRES

- i. **Enhance and protect Kilburn Town Centre's evening economy and comparison retail offer, including the creation of a food and drink cluster around the Kiln Theatre. Redevelopment of Kilburn Square is to provide a new market, retail floorspace and public square to acts as a focal point for the centre.**
- j. **Cricklewood, Willesden Green, Queen's Park and Kensal Rise will provide convenience retail for local communities in addition to a restaurant and café offer. New convenience retail floorspace will be directed to Willesden Green and Cricklewood.**

### COMMUNITY AND CULTURAL FACILITIES

- k. **Securing infrastructure in South Kilburn to include a new community space, 3 form of entry primary school and nursery and a Healthy Living Centre.**
- l. **Enhance and protect playing pitches at Gladstone Park.**

### EMPLOYMENT AND SKILLS

Supporting the local economy by:

- m. **Protecting and enhancing Queen's Park Creative Quarter and South Kilburn Enterprise Hub.**
- n. **Supporting the establishment of new Creative Quarters at Kilburn and Willesden Green.**



- o. Within Creative Quarters proposals to redevelop local employment sites will be required to re-provide high quality affordable workspace on site in accordance with policy BE3.**
- p. The conversion of vehicle repair premises on Hassop Road to uses which improve amenity for neighbouring residential units will be supported.**

## OPEN SPACE AND BIODIVERSITY

Contribute to high quality, well-used open spaces and wildlife corridors to include:

- q. Enhancements to South Kilburn, Chapter Road, Aylestone Avenue and Rainbow Park open spaces**
- r. The creation of seven new pocket parks in South Kilburn Growth Area.**
- s. Protecting and enhancing existing wildlife corridors.**
- t. Delivering tree planting focussed along the A5 corridor and South Kilburn Growth Area.**

## TRANSPORT

- u. Safeguard land for the West London Orbital route.**
- v. Create a high quality pedestrian connection from Brent Cross West Thameslink station to Staples Corner and the wider area.**
- w. Reduce traffic dominance and enhancing the A5 corridor through public realm improvements to healthy streets standards.**
- x. Enhance cycle links from Kensal Rise and Kilburn to Church End via Willesden Green, and from Harlesden to Cricklewood.**

## JUSTIFICATION

### CHARACTER, HERITAGE AND DESIGN

- 5.6.12** The designation of Cricklewood Town Centre as a Conservation Area and extension to Mapesbury Conservation Area boundary reflects the distinct and special character of these areas as outlined in the Brent Heritage Study. This will ensure that future development contributes positively to the character of these areas.
- 5.6.13** This place has a strong sense of character, dominated by two to three storey Victorian terraces and suburban houses with large gardens. Tall buildings would not be in keeping with the character of the majority of this place. South Kilburn Growth Area is the exception. This area contains post-war high rise

social housing. Through redevelopment taller tower blocks are being replaced with podium development and mansion blocks. However, there is potential for a limited number of taller buildings where consistent with the South Kilburn Masterplan. Elsewhere intensification corridors such as the A407 High Road and A4003 Willesden Lane and parts of town centres which are not conservation areas and currently have a varied character building heights up to 15-18 metres (5-6 storeys) could be appropriate

## HOMES

- 5.6.14** The council-led regeneration of South Kilburn Growth Area is a 15 year programme which is about half way through. The council's objective is to improve living conditions in South Kilburn by providing new facilities and high quality homes including 1,200 affordable homes for social rent for existing South Kilburn secure tenants, supported by homes for market sale. Two phases have been completed to date and new housing and open space has been recognised with a number of awards. In 2017 the council appointed a design team to review the South Kilburn Masterplan, informed by engagement with residents and stakeholders. The masterplan identified potential for an additional 400 homes to be delivered to further contribute to creating a mixed community.
- 5.6.15** Kilburn Square is the principal opportunity site in Kilburn Major Centre. Planning permission has been granted for redevelopment of part of the site for mixed-use retail-led development but to date this has not come forward. Including the Council's land ownership will allow for a more comprehensive scheme which could provide a new public square giving Kilburn Town Centre a much needed focal point and meeting space. The site offers the opportunity to replace the poor quality market facility with a new market and accompanying retail units with larger-floorplate, which are required to support Kilburn's role and function as a Major centre.
- 5.6.16** Cricklewood Retail Park which contains a Matalan and Wickes store is located outside of Brent's town centres. The buildings which take the form of large format retail warehouses and dominant car parking do not contribute positively to the character of the area. Redevelopment to a residential-led scheme will improve the quality of the environment and make more efficient use of the land. Notwithstanding the existing retail uses, the council seeks to direct retail to existing town centres to support their viability.
- 5.6.17** In Cricklewood Town Centre there have been a number of infill developments which are not sympathetic to character of this proposed Conservation Area. Redevelopment

of these sites to a style more sympathetic to the existing character and uniformity of the terraces fronting the A5 would have a positive impact on local character. In addition redevelopment should contribute to enhancing the setting of the A5 through public realm improvements and tree planting.

- 5.6.18** Within Willesden Green Town Centre there are a number of key sites which could help to support its viability. The Sainsbury's supermarket is set back from the main high street. Comprehensive redevelopment of the Sainsbury's, car park and adjoining uses for mixed-use development could make better use of this site and create a stronger connection between the retail use and high street. Queen's Parade is a one storey parade of shops. Given that the parade is within a town centre and in an area of high public transport accessibility, more efficient use could be made of the site by developing residential above the shop. This would help contribute to meeting housing need whilst also maintaining the town centre uses. The once vacant Police Station is now occupied by employment uses. There is demand for workspace in Willesden Green and this use is consistent with its location in secondary frontage and the ambition to promote the town centre as a Creative Hub. However, there is a need to manage the impact of the employment uses on surrounding residential areas. Redeveloping the site for mixed-use development including employment floorspace to create an active frontage could help better manage these impacts.

## TOWN CENTRES

- 5.6.19** Kilburn has the highest comparison goods turnover of any centre in the Borough, and has increased its market share over the past decade. This positive momentum needs to be protected and enhanced. Kilburn acts as the principal evening economy destination for residents of the Cricklewood area, as well as many residents in its immediate catchment, but faces strong competition from a range of other locations including Central London, Camden, and St John's Wood. Building on the introduction of the Jubilee Line Night Tube and promoting evening uses including food and drink 'clusters', will extend the trading life of the centre from retail hours, through to early and later into the evenings.
- 5.6.20** Queen's Park and Kensal Rise play an important role in the evening economy function of the sub-area, Kensal Rise on account of the independent cinema and Queen's Park as an eating and drinking destination. Whilst Cricklewood has a diverse restaurant offer. Development of further uses which support these functions should be supported, but care should be taken that the centre's

ability to meet day-to-day shopping needs is not eroded.

- 5.6.21** Although the core of Willesden Green Town Centre is successful, the west experiences a high level of vacancies and a poor quality environment. These units fall outside of the town centre boundary. In the interests of promoting a more compact and viable centre the council will support the diversification of these areas to other uses, including housing and employment.

## COMMUNITY AND CULTURAL FACILITIES

- 5.6.22** The need for new community facilities is primarily within South Kilburn Growth Area, due both to the planned regeneration and associated population growth and the need to improve life chances in the area, which is currently within the 10% most deprived areas in the country. New infrastructure required to support the development include a new 3 form entry primary school, nursery, Healthy Living Centre, community space and Enterprise Hub.
- 5.6.23** An assessment of playing pitch provision identified some of the facilities at Gladstone Park require improvement to meet future demand.

## EMPLOYMENT AND SKILLS

- 5.6.24** The Brent Workspace study identified existing clusters of creative industries in Queen's Park, Kilburn and Willesden Green, and an unmet demand for incubators, accelerators and co-working space. Within this area there are no designated employment sites, but a high level of micro-businesses and home working. This is something the Council wishes to support and enhance both to improve employment opportunities, encourage enterprise and to reduce the need to travel to Central London for work and associated pressure on the transport network. These creative clusters will be protected and where redevelopment of local employment sites are proposed new affordable workspace to meet identified need will be secured.

## OPEN SPACE AND BIODIVERSITY

- 5.6.25** Whilst the south of this place is well served by open spaces, there are areas of deficiency to the north. There are limited opportunities to secure additional open spaces through redevelopment, given the lack of large scale sites identified for development. It will therefore be important to ensure the quality of existing open spaces are enhanced. In the Keep Britain qualitative

**INSPIRE  
AND BE  
INSPIRED**

**THE LIBRARY**

LIBRARY/MUSEUM/  
ARCHIVES/ EDUCATION  
ART/ THEATRE/ FILM/  
MUSIC/ DANCE/  
CONFERENCE/  
BUSINESS/ MEETING  
CAMPUS/ COMMUNITY

LIBRARY  
CAFFEE OPEN



study open spaces in this place overall scored highly. However, scope for improvements were identified in particular to Rainbow Park, Aylestone Avenue and Chapter Road Open Spaces. South Kilburn Growth Area is an opportunity to secure additional open space with seven pocket parks to be secured and Kilburn Open Space enhanced.

## TRANSPORT

**5.6.26** Projected population growth will place pressure on the road network, meaning the only sustainable long term solution is to promote active and sustainable travel over private vehicle use. A key barrier to encouraging people to use public transport over private vehicles is that orbital links in this part of the borough are reliant on the bus network and therefore unreliable. The West London Orbital, which will make use of the existing Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to High Speed 2 and Crossrail and Old Oak and to the east Thameslink at Brent Cross. This will significantly improve public transport accessibility levels in areas which are currently poorly served.

**5.6.27** The A5 corridor is an important gateway into both Brent and Central London. It is heavily trafficked, which creates an unattractive environment both for residents living along the route and businesses. Reducing car dominance and creating a more attractive environment designed to health

streets standards, will have a positive impact on residents by helping to mitigate poor air quality through tree planting. It will also benefit businesses, particularly those operating in Kilburn and Cricklewood Town Centres, by creating an attractive environment which will increase footfall and dwell time and in turn the viability of these centres.

**5.6.28** Improving cycle routes will encourage more people to cycle and take pressure off the road network, which will have recognised health and environmental benefits.

## KEY SITES

South Kilburn Growth Area

Cricklewood Retail Park and Town Centre sites

Kilburn Market Square

Willesden Green Town Centre sites

## OTHER POLICY GUIDANCE

- South Kilburn SPD
- Mapesbury Design Guide
- North Kilburn Design Guide
- Queen's Park Design Guide

# South Kilburn Growth Area

## BSESA1: AUSTEN


Site Plan






Existing Use	Residential, community space and church		
Allocated Use	Mixed tenure housing development incorporating the Marian Community Centre and Immaculate Heart of Mary Catholic Church.		
Indicative Capacity	99		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	99	0	0
Address	1 -167 Austen House, Cambridge Road		
Area	0.35ha		
Description of Existing Site	Austen House and Dickens House redevelopment sites suffer from inherent internal design problems and the relationships between buildings, streets and spaces are also poor and indeterminate. Built using the 'Bison' method of construction Austen and Dickens form two opposing 18 storey towers linked by podium deck incorporating a playground under which there is garaging. At present Austen presents an inactive ground floor frontage to a public realm dominated on Cambridge Road by the blank rear wall of a separate single storey garage and surface level car parking. Austen House contains 167 dwellings.		
Ownership	Public. Church in private ownership		
Planning History	None		
PTAL Rating	5		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport accessibility levels, being in walking distance of Kilburn Park and Kilburn High Road Station.</p>		
Risks	Need to decant existing residents.		
Design Principles	Austen will be a perimeter block courtyard building ranging from 4-6 storeys. It will provide frontage to Cambridge Road, the extension of Percy Road, Stafford Road and the public realm between it and the new Blake Court development to the south. The scale and form of the development should prevent north facing single aspect units. It should maximise sunlight and daylight to the courtyard and adjacent northern property through the lower storey heights being on the southern and northern sides of the perimeter blocks. It is proposed that the existing uses of Catholic Church and Community Centre being incorporated into the redevelopment, in relation to the Church this can be by the building remaining in situ or provision of a new building that incorporates the church and community uses.		
Infrastructure Requirements	Church and community centre.		
Justification	The block is of poor construction that it is not viable nor desirable to refurbish. The blocks sit within a poor quality landscape of disparate open space and garages which can be replaced by more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets.		

**BSESA2: BLAKE**

<p>Site Plan</p>	 <p>The site plan shows a residential development with several buildings. A red outline highlights a specific area labeled 'Blake Court'. The surrounding area includes other residential blocks and streets. A copyright notice at the bottom of the map reads: '© Crown Copyright and Database Rights 2018 Ordnance Survey 100025260'.</p>
<p>Existing Use</p>	<p>Residential</p>
<p>Allocated Use</p>	<p>Mixed tenure housing development.</p>
<p>Indicative Capacity</p>	<p>121</p>

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		121	0
Address	1-72 Blake Court, Malvern Road		
Area	0.3ha		
Description of Existing Site	Built using the 'Bison' method of construction. Blake is three six storey loosely connected blocks of 72 dwellings forming the southern part of a Dickens, Blake, Austen horseshoe shape around a semi-public space. Dickens is poorly defined in terms of public/private space and its relationship with Malvern Road and Cambridge Road where dead frontage, service areas and parking also prevail.		
Ownership	Public		
Planning History	None		
PTAL Rating	3-5		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>A terrace of locally listed buildings are located to the west of the site along Malvern Road.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport accessibility levels, being in walking distance of Queen's Park Station.</p>		
Risks	Need to decant existing residents.		
Design Principles	<p>Blake will be a perimeter block building ranging in height from 4-8 storeys. It will provide frontages to Cambridge Road, the extension to Percy Road and between the Dickens site to the north and McDonald House/Hampton Close site to the south. A new public pedestrian link will be provided on the southern frontage.</p> <p>Taller elements up to 8 storeys to be integrated at key prominent frontages/corners on Malvern Road and Cambridge Road to indicate the new neighbourhood entrances. The scale and form of the development should prevent north facing single aspect units and maximise sunlight and daylight to the courtyard.</p>		
Infrastructure Requirements			
Justification	Blake House redevelopment sites suffer from inherent internal design problems and the relationships between buildings, streets and spaces are also poor and indeterminate. The block is of poor construction that it is not viable nor desirable to refurbish. The blocks sit within a poor quality landscape of disparate open space and garages which can be replaced by more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets.		

## BSESA3: CARLTON HOUSE

<p>Site Plan</p>	 <p>© Crown copyright and database rights 2018 Ordnance Survey 100025280</p>
<p>Existing Use</p>	<p>Residential and community space</p>
<p>Allocated Use</p>	<p>Mixed tenure housing development.</p>
<p>Indicative Capacity</p>	<p>66</p>

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		66	0
Address	113-128 Carlton House and Carlton Hall, Denmark Road		
Area	0.2ha		
Description of Existing Site	The site comprises a 1950's four storey residential block, playground and Carlton Hall a one storey community space. Much of the development has poor definition of public and shared space and presents an inactive frontage to Denmark Road.		
Ownership	Public		
Planning History	None		
PTAL Rating	5		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport accessibility levels, being in walking distance of Queen's Park Station.</p>		
Risks	Need to decant existing residents.		
Design Principles	The development should blend into the new urban grid, and present a strong frontage onto Denmark Road and Neville Road. Heights should range between 4 and 6 storeys to reflect proposals for surrounding buildings.		
Infrastructure Requirements	New school building		
Justification	The removal of another Carlton House block in association with the Peel development creates an opportunity to reinstate the traditional street pattern and clearly define street frontages, give greater clarity about private and public spaces and improve tenants shared private space and make better use of land which is developed to low densities.		



## BESA4: CARLTON INFANT SCHOOL

Site Plan



Existing Use	Primary school		
Allocated Use	Mixed tenure housing development.		
Indicative Capacity	62		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	62	0	0
Address	Carlton Vale Infant School, Malvern Place		
Area	0.4ha		
Description of Existing Site	The site currently comprises a single storey infants' school in relatively poor quality buildings, bounded by conifer planting on its northern edge along the existing Malvern Road. A separate play area now covers what was formerly part of Malvern Road.		
Ownership	Public		
Planning History	None		
PTAL Rating	2		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site is currently occupied by a school. However, the school is to be relocated to another site within the growth area.</p>		
Risks	Need to relocate school		
Design Principles	<p>A frontage will be reinstated along Malvern Road that provides a transition in set-back distance from 121 Malvern Road and 17-32 Kilburn House, Malvern Place. This active frontage which will play a strong role in providing overlooking of South Kilburn Park will also turn the corner with and along Malvern Place.</p> <p>Building heights will range between 4 and 6 storeys. Malvern Road will be reinstated with sufficient space provided to ensure vehicles can turn into it from Malvern Place. This will form the principal vehicular route as it is proposed to close vehicular access between Malvern Road and Carlton Vale. Ideally no or very limited car parking shall be provided between the new building frontages and the highway.</p> <p>If it is greater attention should be paid to both softening its impact on the street scene and incorporating better quality planting than exhibited at Nexus Court.</p>		
Infrastructure Requirements			
Justification	<p>Following completion of the move of the school to its new site on Wordsworth and Masefield the site will predominantly be developed for residential purposes. In addition what was formerly Malvern Road highway land will be improved as a pedestrian and cycleway to form a continuation of the street that links up with Malvern Place.</p>		

### BSESA5: CRAIK

Site Plan



Existing Use	Residential
Allocated Use	Mixed tenure housing development with potentially ground floor commercial uses.
Indicative Capacity	120



Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		20	100
Address	1-167 Dickens House, Malvern Road		
Area	0.29ha		
Description of Existing Site	Twelve storey residential tower of 72 dwellings with ground floor car parking set within landscaping with a small amount of car parking to the front on Carlton Vale and Neville Close and car parking to the rear with no clear boundary between public and private space along pedestrian route which follows the alignment of the Canterbury Road.		
Ownership	Public		
Planning History	None		
PTAL Rating	5 increasing to 6 a in 2031		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport accessibility levels, being in walking distance of Queen's Park Station.</p>		
Risks	Need to decant existing residents.		
Design Principles	<p>Create a strong frontage along Carlton Vale with active ground floor uses if viable, and frontage along Canterbury Road and Neville Close. To respond to the gateway context and heights of William Dunbar House/Peel and the land mark Canterbury Road/Carlton Vale corner position by creating a tall building up to 14 storeys, whilst dropping in height towards Peel to 4 storeys to provide variety on townscape and facilitate daylight/sunlight to the buildings that will run along the Canterbury road frontage.</p> <p>If commercial frontage is provided this will be expected to be on the pavement edge, but sufficient space must be provided to facilitate tree planting defining Carlton Vale's boulevard status/typology.</p>		
Infrastructure Requirements			
Justification	Poor quality residential block which it is neither viable nor desirable to refurbish. The opportunity exists to create a stronger corner which will act as a gateway to South Kilburn, to continue a commercial ground floor use from Queen's Park to Peel (if viable) whilst continuing the step change in the quality of mixed use mixed tenure residential accommodation.		

## BSESA6: CRONE AND ZANGWILL

Site Plan



Existing Use	Residential
Allocated Use	Mixed tenure housing development with potentially ground floor commercial uses.

Indicative Capacity	145		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	45	100	0
Address	1-85 Crone Court, 1-10 Zangwill House Rupert Road, Canterbury Road		
Area	0.45ha		
Description of Existing Site	<p>A more traditional 1950's residential block in poor quality. Crane is a 12 storey block of 85 dwellings and Zangwill is a four storey block of ten dwellings. Crone Court and Zangwill are separated from Woodhouse Urban Park by Denmark Road.</p> <p>Both blocks have historically had a lack of clarity about what is the front or back of the property and public and private space, although Zangwill more recently has made this more apparent by incorporating a 6 foot close boarded fence along Rupert Road.</p> <p>The entrances to both are set in a public realm principally dominated by car parking with a limited amount of green space at one of its entrances. Both blocks face on to a communal private/semi-public space.</p>		
Ownership	Public		
Planning History	None		
PTAL Rating	4/5		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport accessibility levels, being in walking distance of Queen's Park Station.</p>		
Risks	Need to decant existing residents.		
Design Principles	A perimeter block development to create frontage along Denmark Road, Rupert Street and Canterbury Road. Development is to range in height from 4 to 10 storeys. A taller 10 storey element should be located adjacent Woodhouse Urban Park. The scale and form of the development should maximise sunlight and daylight to the courtyard and also Woodhouse Urban Park.		
Infrastructure Requirements			
Justification	The accommodation is not viable to maintain or bring up to modern day standards. Redevelopment provides an opportunity to create a stronger frontage onto Woodhouse Urban Park and the adjacent streets including Canterbury Road where there is currently no defined frontage and better integrate the site into the wider development. This will contribute to the continued step change in the quality of mixed use mixed tenure residential accommodation.		

## BESA7: DICKENS



Existing Use	Residential
Allocated Use	Mixed tenure housing development.
Indicative Capacity	62

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		40	22
Address	1-167 Dickens House, Malvern Road		
Area	0.3ha		
Description of Existing Site	Built using the 'Bison' method of construction Austen and Dickens form two opposing 18 storey towers linked by podium deck incorporating a playground under which there is garaging. At present Dickens presents an inactive ground floor frontage of garages with a small car park, green space and rear of separate garage block on Malvern Road. Dickens House contains 167 dwellings.		
Ownership	Public		
Planning History	None		
PTAL Rating	3		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>A terrace of locally listed buildings are located to the west of the site along Malvern Road.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport accessibility levels, being in walking distance of Queen's Park Station.</p>		
Risks	Need to decant existing residents.		
Design Principles	Dickens will be a perimeter block building ranging from 4-7 storeys. It will provide frontage to Malvern Road and the extension of Percy Road. Taller elements up to 7 storeys to be integrated at key prominent corners to indicate the new neighbourhood entrances. The Dickens development will be designed and orientated to avoid overlooking issues with the neighbouring school. The scale and form of the development should prevent north facing single aspect units. It should maximise sunlight and daylight to the adjacent school through the lower storey heights being on the south western side of the perimeter block.		
Infrastructure Requirements			
Justification	The block is of poor construction that it is not viable nor desirable to refurbish. The blocks sit within a poor quality landscape of disparate open space and garages which can be replaced by more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets.		

## BESA8: HEREFORD HOUSE AND EXETER COURT

Site Plan



Existing Use	Residential and commercial
Allocated Use	Mixed tenure housing development and new open space
Indicative Capacity	202

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		202	0
Address	1-124 Hereford House and 1-32 Exeter Court Carlton Vale		
Area	0.8ha		
Description of Existing Site	<p>Hereford House is an 18 storey residential block comprising 124 dwellings. Exeter Court is 32 dwellings formed of four storey residential blocks connected by a public open space at a podium level incorporating a playground under which is garaging and a commercial storage facility. The buildings are fragmented and present a blank frontage on to Carlton Vale and Granville Road, with public realm essentially comprising car parking/hardstanding for garage access interspersed with sporadic semi mature trees along the street edge.</p>		
Ownership	Public		
Planning History	None		
PTAL Rating	6a		
Planning Considerations	<p>The site is within the South Kilburn Growth Area. South Kilburn Conservation Area is to the north of the site. A locally listed building 71 Cambridge Road is located adjacent the site to the north east. The site is located within an Air Quality Management Area (AQMA). The site benefits from a high public transport accessibility level, being in walking distance of Kilburn Park and Kilburn High Road Stations. A bus stop is adjacent the site on Carlton Vale.</p>		
Risks	Need to decant existing residents.		
Design Principles	<p>The creation of the new Granville Park, on the west of the site, will improve access to open space in the area and also create an overlooked public route from Carlton Vale to Granville Road. It will complement South Kilburn open space by providing a more intimate space, with a high-quality hard paved area to encourage use in all seasons. To the east residential perimeter blocks arranged around a courtyard should range in height from 4 to 12 storeys and positively address all external frontages providing overlooking and appropriate set-backs for residents' privacy and sufficient planting space.</p> <p>Lower storey elements are to be located to the north towards the conservation area, with taller elements fronting Carlton Vale. A variety of heights along the southern, eastern and western frontages will both add interest and provide the opportunity for sunlight/day light to penetrate into the internal space and dwellings. The scale height, massing, design and detailing of the proposed buildings should be such that they do not undermine the need to preserve and enhance the settings of adjoining heritage assets.</p>		
Infrastructure Requirements	Open space		
Justification	<p>The existing buildings are of poor design and construction creating poor housing conditions and potential for anti-social behaviour in communal spaces which cannot be remedied cost efficiently through refurbishment.</p> <p>The opportunity exists to provide better housing along sound urban design principles creating a human scale environment that integrates with the surrounding area and is more sympathetic in scale to the conservation area. It will be at a density that reflects the PTAL rating and reinforces the street hierarchy and setting of Carlton Vale in particular, subject to the Council being able to ensure Granville Road is reopened between this site and the Carlton and Granville Centres which subsequently will result in the existing Granville Open Space being developed for housing, this site will incorporate its replacement open space. This will provide a better quality open space with greater opportunity for sunlight penetration, overlooking/sense of security and due to its prominence more likely to be used by the surrounding population.</p>		



# BESA9: KILBURN PARK JUNIOR SCHOOL



Site Plan



Existing Use	Kilburn Park Junior School		
Allocated Use	Open space		
Indicative Capacity	0		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	0	0
Address	Kilburn Park Junior School, Carlton Vale, NW6 5RG		
Area	0.2ha		
Description of Existing Site	Currently the site is Kilburn Park Junior School		
Ownership	Public		
Planning History	None		
PTAL Rating	5 increasing to 6a in 2031		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport accessibility levels, being in walking distance of Queen's Park Station.</p>		
Risks	Need to relocate the school.		
Design Principles	Incorporated into the South Kilburn Park		
Infrastructure Requirements	Open space		
Justification	<p>The existing school will be transferred to the Wordsworth House/Masefield House site which also incorporates some of the existing South Kilburn Open Space. Re-provision of open space on this site will be of significant benefit compared to the loss of the space transferred to the new school site. It will create a more regular shaped open space that can be put to better use and feel more secure. It will raise the profile of the space in the public's consciousness and its impact on townscape by opening up views into the park when arriving from Queen's Park/Kilburn Lane.</p>		

## BSESA10: NEVILLE AND WINTERLEY'S

Site Plan



Existing Use	Residential
Allocated Use	Mixed tenure housing development.
Indicative Capacity	137

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		137	0
Address	Neville House and 1-64 Winterleys, Denmark Road		
Area	0.34ha		
Description of Existing Site	More traditional 1950's council blocks. Winterleys is a 12 storey block of 64 dwellings which faces on to Woodhouse Urban Park but is currently separated from the park by car parking. Neville House is a four storey block with 8 dwellings. An open space which has no clear function as either public, or private/tenant space is to the east and north of the two blocks.		
Ownership	Public		
Planning History	None		
PTAL Rating	4/5		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport accessibility levels, being in walking distance of Queen's Park Station.</p>		
Risks	Need to decant existing residents.		
Design Principles	Development should take influence from the Albert Road and Bond developments and integrate into the new layout. An active building frontage should be provided along Woodhouse Urban Park and Denmark Road. Heights should range from 2 to 9 storeys, with taller elements fronting Woodhouse Urban Park. Building are to be arranged around a courtyard with breaks in height to allow daylight and sunlight into the heart of the buildings.		
Infrastructure Requirements			
Justification	The blocks are in a poor state of repair and represent a poor overall use of the space. There is an opportunity to provide more dwellings in a better environment which better addresses streets and integrates with the new development to the north and east. It will also create a stronger relationship with Woodhouse Urban Park. In addition the creation of a court yard will give residents access to more useable private space. This will contribute to the continued step change in the quality of mixed use mixed tenure residential accommodation and public space.		

## BESA11: OLD GRANVILLE OPEN SPACE



Site Plan

Existing Use	Open space and route
Allocated Use	Mixed tenure housing development and new open space
Indicative Capacity	10

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		10	0
Address	Land west of 21-51 Granville Road		
Area	0.4ha		
Description of Existing Site	The site is currently a public connection between the two parts of Granville Road which was severed by extension of the grounds of the Iranian school over public highway. It also incorporates a small public open space essentially of seating areas within a typically functional municipal landscape created in the early phases of the South Kilburn estate's regeneration. The space is poorly overlooked with no adjacent frontage development and backs on to rear boundary fences of villas on Princess Road, increasing their risk of being subject to crime.		
Ownership	Public		
Planning History	None		
PTAL Rating	5		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>South Kilburn Conservation Area adjoins the site on its northern boundary.</p> <p>The site comprises open space. Compensatory open space of equivalent quality and higher quality will be provided as part of the Hereford Exeter site development.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from a high public transport accessibility level, being in walking distance of Kilburn Park and Kilburn High Road Stations. A bus stop is adjacent the site on Carlton Vale.</p>		
Risks			
Design Principles	To essentially replicate the character of the adjacent buildings by creating buildings of a modest height (typically 4 storeys with opportunities to vary by one storey as has occurred on the adjacent sites). The buildings will front the street and be setback from the pavement edge in a similar manner to that of 21-53 Granville Road. This will provide sufficient room for a defensible space to ensure residents' privacy whilst allowing for incorporation of sufficient landscaping to enhance the street setting.		
Infrastructure Requirements			
Justification	Public consultation identified that this space due to its limited visibility and lack of attractions is essentially unknown to the majority of the surrounding population. Whilst the reopening of Granville Road currently incorporated into the Iranian school might improve its accessibility and raise public awareness there is no certainty that its inherent potential weakness; a lack of natural surveillance will be satisfactorily addressed. As such it is considered that there is merit in transferring the open space to the Hereford House and Exeter House development. This site would then be redeveloped for residential purposes. It is recognised that this is likely to reduce the amount of dwellings delivered in South Kilburn; the Hereford/Exeter site which would incorporate the new open space can be developed at a higher density. Nevertheless, the reintroduction of the historic building line, likely reduction in the potential for crime and anti-social behaviour within the public realm and greater likely use of the alternative open space merit this approach.		

## BESA12: WORDSWORTH, MASEFIELD AND PART OF SOUTH KILBURN OPEN SPACE

<p>Site Plan</p>	
<p>Existing Use</p>	<p>Residential with commercial at ground floor</p>
<p>Allocated Use</p>	<p>Redevelopment to provide a new school building to incorporate the existing Kilburn Park Junior and Carlton Vale Infants Schools, plus nursery, community space and residential.</p>
<p>Indicative Capacity</p>	<p>?</p>

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		0	0
Address	1-29 Wordsworth House and 1-11 Masefield House, Stafford Road		
Area	0.3ha		
Description of Existing Site	<p>Wordsworth House is a six storey residential concrete block comprising 32 dwellings, a mixture of maisonettes and flats. Masefield House is a four storey of similar construction. It has commercial units at ground floor level, comprising launderette and retail uses.</p> <p>The open space is poorly defined. Undulating topography and the pinch point created by Perrin House and the Stafford Road dwellings to the north makes it feel detached from the remainder of the open space.</p>		
Ownership	Public		
Planning History	None		
PTAL Rating	3/4		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>Part of the site is open space. Open space of the same quantity and improved quality will need to be reprovided as part of the reconfiguration of the Kilburn Park Junior Schools Site. There are a number of mature trees on the site which should seek to be retained.</p>		
Risks	Need to decant existing residents.		
Design Principles	<p>The three storey school building (with potential for additional modest height increases to accommodate residential development should this be provided to meet staff needs) with clearly defined and animated frontages will provide a perimeter block on Stafford Road and Percy Road, plus public realm to the south between it. To the west the schools grounds will extend to include some of the current South Kilburn open space. This amenity and learning space will retain the maturing trees and provide a more clearly defined boundary to the remaining open space.</p>		
Infrastructure Requirements	New school building		
Justification	<p>The buildings are of poor construction and design creating problems of antisocial behaviour. The site provides an opportunity to decant the existing schools in a single move into a high quality contemporary purpose built building with shared facilities and access by the community to its facilities out of school hours.</p> <p>It will free up the existing Kilburn Park Junior School site to be incorporated into the South Kilburn open space, whilst the existing open space will become part of the school's amenity and learning space. This will allow a more clearly defined and regular shape open space to be created which will increase its benefit to the population.</p>		

## BESA13: JOHN RATCLIFFE HOUSE

Site Plan



Existing Use	Residential with associated parking.
Allocated Use	Mixed tenure housing.
Indicative Capacity	35



Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		0	35
Address	1-64 John Ratcliffe House, Chippenham Gardens, London, NW6 5LH		
Area	0.15ha		
Description of Existing Site	The current building is of 1970's brick design, rising to 9 storeys in height and has inactive frontages onto both Chippenham Gardens and Kilburn Park Road. To the south the site backs onto 3 storey terrace housing of Shirland Road which has commercial frontages on the ground floor. The west portion of the site comprises a car park which is enclosed by surrounding developments.		
Ownership	Public.		
Planning History	n/a		
PTAL Rating	4		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>Part of the west portion of the site which is currently serving as a car park has floodzone 3a (surface water) concerns, as does the adjacent Chippenham Gardens road, in particular its junction with Malvern Road.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport links with a PTAL rating of 4, being with a 12 minute walk of 3 bus stops and Westbourne Park Underground Station.</p>		
Risks	Relocation of current residents and their opposing.		
Design Principles	<p>The frontage is to activate the street and interact with the new Chippenham Gardens development. The new building should be 5 to 7 storeys, and complement the heights of new developments along Malvern and Kilburn Park Road.</p> <p>The development should extend to the plot boundaries, to provide for the incorporation of a useable amenity to the rear for residents. The layout will have to positively address the massing concerns and interaction with Malvern Place, overcoming the potential for a blank wall and undefined space to be a product of the regenerated site.</p>		
Infrastructure Requirements	Green space. Cycle parking.		
Justification	The building has a high proportion of smaller dwellings, this and its design and build quality means that it is subject to anti-social behaviour and is unviable to retain in the longer term. There is an opportunity to make better use of the space to meet a wider range of housing needs and overcome existing problems. Reconfiguring the building to the plot boundaries will allow the creation of a useable shared courtyard for residents. In addition this will allow the height of the building to be lowered to better reflect the scale of surrounding buildings. This will contribute to the continued step change in the quality of both residential accommodation and public space.		

## BESA14: WILLIAM DUNBAR HOUSE AND WILLIAM SAVILLE HOUSE

Site Plan



Existing Use	Residential
Allocated Use	Mixed tenure housing with commercial/town centre uses at ground/mezzanine floor.
Indicative Capacity	213

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		0	213
Address	1-74 William Dunbar House, Albert Road and 1-74 William Saville House, Denmark Road, NW6 5DE.		
Area	0.6ha		
Description of Existing Site	Two 1960's residential towers of 13 storeys. William Dunbar House has 73 dwellings and a ground floor council office complex and William Saville has 74 dwellings. At present the towers are poorly connected to the surrounding area due to being set back from the streets onto which they bound. William Saville has been placed where Denmark Road would have continued to Carlton Vale reducing permeability of the South Kilburn estate. The planting and landscape around these blocks is of a significantly better quality than the rest of the older blocks in the South Kilburn estate particularly along Carlton Vale and Albert Road. The provision of brick walls and fences along Carlton Vale provides clarity that the space is for tenants.		
Ownership	Public		
Planning History	n/a		
PTAL Rating	5		
Planning Considerations	<p>The site is within the South Kilburn Growth Area. West Kilburn Baptist Church to the south of the site is a Local Heritage Asset. The perimeter of the site is lined with numerous trees which should be retained.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>A small section of the site to the north east has a history of industrial usage and will therefore require testing for contamination, with and potential remediation works being carried out.</p> <p>The site benefits from good public transport links with a PTAL rating of 5, being with a 5 minute walk of 2 bus stops and Queens Park train station.</p>		
Risks	Relocation of current residents.		
Design Principles	Development is to create a strong active frontage along Carlton Vale, comprising ground floor commercial uses. Buildings should generally range in height from 5 to 9 storeys. As a gateway to South Kilburn there is also an opportunity for a taller element of up to 17 storeys to create sense of arrival. The demolition of William Saville House offers the potential of a pedestrian link to Carlton Vale which should be provided and development provided along this frontage to create overlooking/safe environment.		
Infrastructure Requirements	Cycle parking.		
Justification	The site is in a prominent gateway location and the current development does not capitalise on this. There is an opportunity for development to create a sense of arrival and present a stronger active frontage along Carlton Vale brought to life with commercial units at ground floor to strengthen connections between Queen's Park station/Salusbury Road and the Peel development which will provide a key health facility destination. In addition, opening up the Denmark Road to pedestrian movement will allow improved connections from the South Kilburn estate into the wider area.		

## BESA15: UK ALBANIAN MUSLIM COMMUNITY AND CULTURAL CENTRE



Site Plan

Existing Use	Community use
Allocated Use	Mixed use comprising community use and commercial or residential
Indicative Capacity	Unknown

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		0	0
Address	88-90 Carlton Vale, NW6 5DA		
Area	0.05ha		
Description of Existing Site	Currently the site is a two storey utilitarian heavily altered 1950s building formerly a public house, with adjacent car park.		
Ownership	Public		
Planning History	n/a		
PTAL Rating	5		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The community facility is meeting a local need and is to be retained as part of any redevelopment of the site.</p> <p>South Kilburn Conservation Area lies to the east of the site, but is not visible from the site due to Peel Precinct.</p> <p>The West Kilburn Baptist church which adjoins the site is a locally listed building. A detailed analysis will be required of the potential impact on the church and its context,</p> <p>The site has historically been in industrial use and a preliminary risk assessment will be required to identify if there is potential for contamination. If necessary remediation will be required.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport links with a PTAL rating of 4, being with a 5 minute walk of 2 bus stops and Queens Park train station.</p>		
Risks	Impact on the operation of the community centre during redevelopment.		
Design Principles	<p>To create an active ground floor use that extends the proposed frontage linking Queen's Park and Peel. The opportunity exists to create a corner landmark building rising to 6 storeys and possibly higher if incorporating the Baptist Church car park depending if relationship with adjacent existing or proposed buildings produces a successful solution in terms of sympathetic relationship/overlooking/overshadowing of other buildings.</p> <p>The West Kilburn Baptist Church is to be retained and its setting enhanced.</p>		
Infrastructure Requirements			
Justification	<p>The premises are a poor piece of townscape at a very low density given the PTAL rate and potential heights of adjacent developments such as Craik House the building currently presents essentially blank facades to the adjoining public realm. The opportunity exists to develop at a much higher density, particularly if incorporating the adjacent West Kilburn Baptist Church car park whilst maintaining and improving the existing community use.</p>		



Indicative Capacity	Unknown		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	0	0
Address	The Oxford Kilburn (OK) Club Neville Road and Christian Holt House.		
Area	0.2ha		
Description of Existing Site	The site is currently occupied by the Oxford and Kilburn Youth Trust, a charity that supports younger people in the area. The premises are a mixture of a three storey (1920's Neo-Georgian), two storey (1960s/70s) and single storey (1920s) buildings. These are used as administrative offices and also have a main single storey hall and other rooms for youth activities consistent with the provision of the services by the Trust. The site also contains a memorial wall and garden dedicated to Dylan Kirby.		
Ownership	Public		
Planning History	n/a		
PTAL Rating	4		
Planning Considerations	<p>The site is within the South Kilburn Growth Area.</p> <p>The community facility is meeting a local need and is to be retained as part of any redevelopment of the site.</p> <p>There are no flood zones within the site, but potential for surface water flooding on the adjacent Neville Road.</p> <p>There are mature trees on the western boundary of the site which will need to be retained and protected during construction works.</p> <p>South Kilburn Conservation Area lies to the east of the site, but is not visible from the site due to Peel Precinct.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site benefits from good public transport links with a PTAL rating of 4, being with a 5 minute walk of 2 bus stops and Queens Park train station.</p>		
Risks	Impact on the operation of the community centre during redevelopment.		
Design Principles	A perimeter block on three sides that provides the community use on the ground/lower floors and has active frontages and a positive relationship with the adjacent highways of Denmark Road, Canterbury Road and Neville Road. Consideration should be given to limiting impacts on the development of the adjacent Crone and Zangwill site as set out in this SPD with a view to not undermining its identified development capacity. The heights of proposed buildings should be up to 6 storeys to reflect the scale of the street and in particular the other side Neville Road as proposed in the Peel development. Ideally the Dylan Kirby memorial wall should be kept in situ, or appropriately incorporated into the new building.		
Infrastructure Requirements			
Justification	The Trust has approached the Council regarding the potential of regeneration of the site to better support its activities in contemporary premises fit for sustaining the charity's long term purpose and improving outcomes for young people. Ideally the community use will remain on site with re-provision occurring in new buildings. Nevertheless in the context of planning policy, off-site re-provision may be possible, as long as it can be justified to show nil detriment in terms of meeting any local community needs compared to the existing premises. Although in the context of South Kilburn, some of the buildings are older than their surroundings, they are not considered to be of such historic or architectural significance that they should necessarily be retained if high quality replacements are proposed. The Dylan Kirby memorial is clearly well regarded by the local community and its sympathetic incorporation into any regeneration needs to be considered.		

# Cricklewood

## BESA17: CRICKLEWOOD BROADWAY RETAIL PARK

Site Plan



Existing Use	Commercial/parking, including: Wicks and Matalan superstores.
Allocated Use	Residential and commercial



Indicative Capacity	305		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		150	155
Address	311-317 Cricklewood Broadway, London, NW2 6JN.		
Area	2.3ha		
Description of Existing Site	The site currently consists of two large superstores (Wicks and Matalan) surrounded by large amounts of car parking. Longley Way intersects the site separating the two superstores. Wicks, to the north, backs onto the railway line. To the east is Cricklewood Broadway, from which the site is accessed. The south the site is bordered by Temple Road and the west backs onto the 3 storey flats of Stoll Close and 3 storey terrace houses of Rusper Close.		
Ownership	Private		
Planning History	n/a		
PTAL Rating	3/4		
Planning Considerations	<p>The north of the site backs onto the railway and includes the railway trackside which is designated as both a wildlife corridor and a Grade 1 Site of Importance for Nature Conservation (Dudding Hill Loop between Cricklewood and Harlesden B106C). Care should therefore be taken so as not to disturb this valued ecosystem. The car parks are verged with vegetation of varying quality, including bushes and trees. There are also 3 trees on the path along Cricklewood Broadway.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>Significant areas of car parking and parts of Longley Way are within Flood Zone 3a due to surface water flooding. This is associated with the large areas of impermeable paving and lack of vegetation. It will need to be demonstrated through a Flood Risk Assessment how surface water flooding will be mitigated and development will be made flood resilient.</p> <p>The site has a history of industrial use and will therefore require testing for contamination, with any potential remediation works being carried out.</p> <p>With a PTAL rating of both 3 and 4 the site is within a 10 minute walk of one bus stop which is serviced by numerous buses.</p>		
Risks	Opposition from superstores due to impact on operation during construction.		
Design Principles	The general character of the area consists of 2 to 3 storey residential housing including flats and terraces. This suggests that the development should be sympathetic to this and being primarily of 3 storeys in height. However, due to the size of the site it may be possible to steer away from this character in areas, having elements of the build which are of 4 and 5 storeys in height. Due to the proximity to the wildlife corridor and SINC and issue with surface water flooding, the development should include significant green infrastructure, incorporating nature and enhancing it in the process. The introduction on greenspace will improve the site and in the process increase ground permeability, reducing any flooding concerns.		
Infrastructure Requirements	Potentially parking. Green infrastructure.		
Justification	This is a large site which is currently being used for very low intensity purposes and would be much better utilised for the development of homes. Currently having low aesthetic and ecological value, the site could be developed to incorporate nature, creating a vibrant and relaxing place for people to live. Due to the size of the site it should be feasible to include high density, 4/5 storey elements, increasing the sites utility.		

## BSA18: 245-289 CRICKLEWOOD BROADWAY



Existing Use	Commercial and associated warehousing and car parking.
Allocated Use	Residential and commercial.
Indicative Capacity	60

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
			30
Address	243-289 Cricklewood Broadway, London, NW2 6NX		
Area	0.6ha		
Description of Existing Site	<p>The site currently contains a large inter-War block of commercial units with frontages onto Cricklewood Broadway and warehouse access via the rear on Hassop road. The roof of the block contains parking which is also accessed via 253 Cricklewood Broadway and exited at the rear onto Hassop Road. The units are made of unsympathetic materials to local appearance, including concrete and corrugated iron. The north of the site is bounded by a building of typical character for Cricklewood Broadway, being a 3 storey period terrace house with ground floor commercial frontage. To the east there is a small green space bordering Cricklewood Broadway with residential terrace housing behind. The south of the site is bordered by a single storey building of local architectural character. The rear of the building, fronting Hassop road is industrial, comprising warehouse access and garages.</p>		
Ownership	Private.		
Planning History	n/a		
PTAL Rating	5		
Planning Considerations	<p>The site forms part of Cricklewood Town Centres primary shop frontage. Developments should therefore be in keeping with the local character and retain ground floor the commercial frontages.</p> <p>As with the majority of Brent the site is located within an Air Quality Management Area (AQMA).</p> <p>The majority of the site has historical industrial usage and will therefore require testing for contamination, with any potential remediation works being carried out.</p> <p>There are two trees along Cricklewood Broadway, adjacent to the site which should be retained.</p> <p>With a PTAL rating of 5 the site is well provided for with 2 bus stops, serviced by numerous buses, and Cricklewood train station within a 10 minute walk of the site.</p>		
Risks	Multiple ownership.		
Design Principles	<p>Constituting part of the Cricklewood Town Centre primary frontage, development should retain a ground floor commercial frontage. Development should reflect the height and proportions of adjoining 3 storey development and be of a quality which complements local character</p> <p>Given the poor air quality along the A5 and surface water flooding it will be important development seeks to increase soft landscaping and reinforce tree planting along the highway.</p>		
Infrastructure Requirements			
Justification	<p>The building currently occupying the site is of little aesthetic value, being composed primarily of materials such as concrete and corrugated iron. This is not in-keeping with local character and, if redeveloped, could become more harmonious with this character. The site is in an area of high PTAL and currently underutilised as low density commercial uses. A mixed use development including housing would help support the vitality of the town centre. The public domain in front of the site is quite spacious and would benefit from the introduction of more green infrastructure.</p>		

# Kilburn

## BSA19: GAUMONT STATE CINEMA




Site Plan

Existing Use	Community use
Allocated Use	Leisure and community uses
Indicative Capacity	0

Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	0	0
Address	197-199 Kilburn High Road, NW6 7HY		
Area	0.7ha		
Description of Existing Site	Part of the building is currently used as a church. The site is adjoined by car parking.		
Ownership	Private		
Planning History	Change of use from theatre club to place of worship (09/1508)		
PTAL Rating	PTAL 4-6 (2015/2031)		
Planning Considerations	<p>The Gaumont State cinema is a Grade II* listed Art Deco movie palace. The building opened in 1937 and was originally designed as a cinema but will fully equipped stage for theatre use including workshops and dressing rooms. Its 37 metre tower is inspired by the Empire State Building. The interior is in an opulent Classical style and includes the original Wurlitser organ. One of the largest and most impressive movie palaces ever constructed in Britain, the Gaumont State, had the greatest audience capacity of any English cinema (4,004 seats). On the corner on Willesden Lane was an imposing second entrance with restaurant and dance floor above. Both externally and internally, George Coles (the architect) brilliantly orchestrated the decoration and space.</p> <p>The site is adjacent Brondesbury Mews which has a terrace of Locally Listed Buildings. The site is also adjacent an area which has been identified in the Heritage and Place-making Strategy for designation as a possible conservation area extension to the Kilburn Conservation Area.</p> <p>The building is located within Kilburn Major Town Centre. The area benefits from high public transport accessibility levels. Kilburn High Road station and Brondesbury Park are the closest tube and overground stations. The area is also served by various bus routes from 6 bus stops within the vicinity.</p> <p>The site is within an Air Quality Management Area, with the adjoining A5 being a major source of both air and noise pollution.</p>		
Risks	Need to protect and preserve the listed building, whilst ensuring its continued use. Need to protect the potential of cultural and community uses for the building.		
Design Principles	<p>Any proposals will be required to retain and enhance the Gaumont State building and its setting. The building's interior forms part of its significance and should be preserved. Applications for substantial alterations to the building will need to be supported and justified within a Heritage Statement and early engagement with the council is advised.</p> <p>In addition, applications for change of use will need to be supported by a detailed analysis of the potential need and impact of the proposed use on the building and its context as well as any public benefit. Buildings such as this are required elements of a sustainable community, providing social, cultural, environmental and economic benefits as well as regeneration. They make a major contribution to the vitality of Town Centres and are a significant element a Borough's cultural infrastructure.</p> <p>The immediately adjacent carpark forms part of the get in area and access to the workshop at the rear of the Gaumont which, when back in use, would be used on a regular basis and will be essential to the long term viability of the building. Any proposals for the building and the carpark must be considered with this in mind.</p>		
Infrastructure Requirements			
Justification	The Gaumont Cinema is a heritage asset of national importance which has played an important role in Kilburn's history. At present the building is an underutilised public asset, as only parts of the building are used by a church group. Promoting full use of the building for cultural, leisure and community uses will help safeguard its future, and allow the wider community to access the facility. Gaumont State is located within Kilburn Town Centre, and increasing its use for cultural, leisure and community activities will contribute to the vibrancy of Kilburn Town Centre and its night time offer.		

## BESA20: KILBURN SQUARE

<p>Site Plan</p>			
Existing Use	Mixed-use including office, residential and retail		
Allocated Use	Mixed-use development including residential, retail including a new market and public square		
Indicative Capacity	100		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	50	50
Address	Kilburn High Road, NW6 6JH		
Area	1.1ha		
Description of Existing Site	Kilburn Square is a prominent site on Kilburn High Road. It comprises mixed-use development constructed in the 1960's including a market, car parking, offices, health centre, parade of retail units and housing. Two storey retail units front the high road. There are residential flats of 5 storeys in height with car parking spaces and private green space behind the shopfront as well as a health clinic.		
Ownership	Private and council owned		

Planning History	Refurbishment of ground floor retail and provision of replacement market, with residential above. (06/3094)
PTAL Rating	PTAL 6 (2015/2031)
Planning Considerations	<p>The market and units fronting the high road form part of the primary frontage of Kilburn Major Town Centre. As such, development should maintain an active frontage along the high road and include retail floorspace. The market adds to the vibrancy of the centre and will be required to be retained and improved.</p> <p>To the south the site is bounded by Brondesbury Road which forms part of Kilburn Conservation Area. The road comprises 2 to 3 storey brick villas built pre 1865. Number 10 Brondesbury Road is locally listed. The north-eastern corner of the site is located within a Site of Archaeological Importance.</p> <p>The area benefits from high public transport accessibility levels. Kilburn High Road station (Overground) is 200m south east and Kilburn Park (Bakerloo) 400m south of the site, the area is also served by various bus routes from 6 bus stops within the vicinity. The main access point onto the site is from Kilburn High Road which forms part of the A5 a busy route into Central London. There is also access to the residential areas through Brondesbury Road.</p> <p>Although much of the site is hard landscaped, Kilburn Square is soft landscaped and provides amenity space for residents. There are a number of mature trees within the square and along the high road. Brondesbury Road to the south of the site is lined with trees.</p> <p>A number of areas of hard standing to the rear of the site are within flood zone 3a due to potential for surface water flooding. The site is within an Air Quality Management Area, with the adjoining A5 being a major source of both air and noise pollution.</p> <p>A number of night time uses are concentrated within Kilburn High Road which can generate noise. The agent of change principle will apply. This means development which introduces sensitive uses to an area (for example housing) will be responsible for managing and mitigating the impact from existing uses.</p>
Risks	Need to manage impact on existing occupiers including market stall holders, during construction.
Design Principles	<p>A new public square and modern market facility will create a focal point both for the site and Kilburn High Road. The layout and design of the square should enable its use for events.</p> <p>Active frontages should be located along Kilburn High Road and the square with mixed-use development above. Development fronting the high road should reflect the building line and heights of adjoining buildings which are predominantly 3 to 4 storeys.</p> <p>Given surface water flooding and poor air quality it will be important development seeks to increase soft landscaping. Tree planting should be protected and reinforced, particularly along the A5. Development through its layout and materials should mitigate impacts from the A5 and nearby night time uses.</p>
Infrastructure Requirements	Re-provision of the market and creation of a new public square.
Justification	<p>The market and buildings are now dated. The layout does not make the most efficient use of the land and has poor permeability. At present Kilburn High Road lacks a focal point. Although this site contains a wide paved area its linear form and the fact it is bounded by the busy A5, means it is not a desirable location to spend time or hold events.</p> <p>Kilburn has the highest comparison goods turnover of any centre in the Borough, and has increased its market share over the past decade. The Brent Retail and Leisure Needs Study identifies to continue this positive momentum additional comparison retail floorspace should be directed to this town centre. This site is a key opportunity to meet the need for additional comparison retail floorspace in Kilburn Town Centre, and create a focal point in the form of a modern public square and market facility. As a town centre location with good public transport accessibility, both the NPPF and London Plan policy promote intensification for mixed-use development including residential. There is scope for this to be achieved through an improved layout which makes more efficient use of the land.</p>

# Willesden Green

## BSESA21: QUEEN'S PARADE

Site Plan



Existing Use	Retail
Allocated Use	Housing with ground level retained for commercial use.
Indicative Capacity	20



Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	20	0
Address	1-12 Queens Parade, Willesden Lane, London, NW2 5HT		
Area	0.06 ha		
Description of Existing Site	Site contains an array of small, single storey commercial units with frontages onto Walm Lane and Willesden Lane. The parade is lined with trees.		
Ownership	Private. Pavement surrounding the plot is public.		
Planning History	Demolition of existing retail units and erection of 6-8 storey student accommodation with ground floor retail and basement warehouse. Pending decision. (17/0322)		
PTAL Rating	5/4. Entirely 5 come 2031.		
Planning Considerations	<p>The site is within Willesden Green Conservation Area and in close proximity to 5 High Road which is a locally listed building, having previously been a bank. The site is at a junction of the road and therefore commands a landmark position within the streetscape.</p> <p>The parade is also part of Willesden Green District Town Centre's primary shopping frontage. Any proposal should provide active ground floor frontage, predominantly in retail use.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site has had historical industrial usage and will therefore require testing for contamination and potential remediation works.</p> <p>There are 6 trees on the adjacent pavement which should be retained.</p> <p>Although the sites itself is not within a flood zone, both the intersection and Willesden Lane are designated Flood Zone 3a due to the risk of surface water flooding.</p> <p>The site benefits from good public transport accessibility levels. It is located within a 5 minute walk of Willesden Green underground station and within a 10 minute walk of numerous bus services.</p>		
Risks	Multiple ownership.		
Design Principles	<p>The general character of the area is that of 3 storey buildings. The site to the rear of the plot rises up to 6 storeys and another site to the east is also 5 storeys. Development should step down from 6 storeys. As primary frontage the new development will need to retain the ground floor for commercial uses. The trees adjacent to the site should be retained with general landscaping and enhancements to the surrounding public realm. As the site lies within the Willesden Green Conservation Area the design principles employed should be sensitive to local character, enhancing it wherever possible. This is also a landmark site visible from long views from within the conservation area and this should also be taken into consideration.</p>		
Infrastructure Requirements	Retention of primary frontages. Enhancement of surrounding public space.		
Justification	<p>The site is within an area of high PTAL, allowing for higher density developments without the need to provide additional parking. The existing one storey unit underutilises the space. The site sits at a prime location, on the intersection of two main roads (Willesden Lane and Walm Lane) and will therefore benefit from enhancements to frontages and public domain.</p>		

## BSA22: WILLEDEN GREEN SAINSBURY'S AND GARAGES



Existing Use	Supermarket, car parking and an employment use.		
Allocated Use	Mixed-use including housing, retail and employment uses.		
Indicative Capacity	50		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	25	25
Address	Sainsbury's, High Road, London, NW10 2TD.		

Area	1.24 ha
Description of Existing Site	The site consists of a large single storey Sainsbury's supermarket and large expanse of car parking. In the north east corner of the site is a vehicle repair garage and associated car park. To the north the site is bounded by rows of 3.5 storey terrace housing with ground floor commercial uses. To the south and east, the site is bounded by residential gardens. The site is accessible from Willesden High Road via Ellis Close, Richmond Avenue and Poplars Avenue. Poplars Avenue is pedestrianised and is not accessible for vehicles.
Ownership	Private
Planning History	n/a
PTAL Rating	4
Planning Considerations	<p>The site is within Willesden District Town Centre and is adjacent to the Willesden Town Centre Conservation Area. The Sainsbury's currently represents part of Willesden Town Centres Secondary Shopping Frontage.</p> <p>The site lacks soft landscaping with the exception of four trees on site.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>The site has a history of industrial use. The north east corner of the plot is currently a vehicle repair garage and is therefore currently industrial. Testing for contamination should be undertaken along with any necessary remediation works.</p> <p>Surrounding the supermarket are small areas designated as Flood Zone 3A due to the risk of surface water flooding. A Drainage and Flood Risk Assessment should identify measures to mitigate the potential flood risk.</p> <p>With a PTAL of 4, the site is located within a 10 minute walk of Willesden Green underground station and within a 5 minute walk of numerous bus services.</p>
Risks	Multiple ownership. Impact on operation of supermarket during construction.
Design Principles	<p>The scale of development should take into account the proximity of surrounding low density housing, being sure not to overshadow.</p> <p>The layout and route network should ensure commercial uses have a strong connection to the High Road</p> <p>The site currently has very little greenery and should therefore look to enhance the environment with the addition of trees and general landscaping.</p>
Infrastructure Requirements	
Justification	<p>The site is currently underutilised with large amounts of land dedicated to car parking. It is a large site in a residential area which could provide significant uplift in housing. The site is well serviced with a variety of stores along the High Road to the north and within close walking distance to transport facilities, making it a sustainable location for residential development. The site has low landscape value and would benefit from the introduction of greenery. This could also help mitigate surface water flood risk.</p> <p>The Sainsbury's supermarket in an anchor store which contributes to the vitality of the town centre. It also helps to meet the borough need for convenience retail floorspace. A supermarket should therefore be retained as part of any proposal.</p> <p>The site contains an existing employment use. The draft London Plan requires Brent to provide additional employment floorspace capacity. As such an increase in employment floorspace will be sought. Retention of employment floorspace in this location is consistent with the designation of Willesden as a creative hub. This designation is informed by the Brent Workspace Study which identifies demand for workspace within Willesden.</p>

## BSESA23: FORMER WILLESDEN GREEN POLICE STATION

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Vacant former police station and residential</p>		
<p>Allocated Use</p>	<p>Mixed-use employment and residential</p>		
<p>Indicative Capacity</p>	<p>10</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>0</p>	<p>10</p>	<p>0</p>
<p>Address</p>	<p>96 High Road, Willesden, London, NW10 2PP.</p>		

Area	0.14 ha
Description of Existing Site	The site is in a prominent location on Kilburn High Road. It comprises two 2 storey houses and the now vacant Willesden Green Police Station. The rear of the building consists primarily of a car park but also has several outbuildings.
Ownership	Private
Planning History	n/a
PTAL Rating	PTAL 4 increasing to PTAL5 in 2021/2031
Planning Considerations	<p>The site is within the Willesden Green Conservation Area. There are several heritage assets adjacent the site, including the Grade II* St Andrew's Church and Grade II vicarage. The Willesden Green Police Station building is an attractive building which contributes positively to the character of the conservation area. The building has been identified in the Heritage and Place-making Strategy for possible Local Listing and any proposals should seek to retain the heritage asset.</p> <p>The site is within Willesden Green District Town Centre.</p> <p>The site is located within an Air Quality Management Area (AQMA).</p> <p>There is one street tree on Huddlestone Road. The mature tree in the garden of 100 High Road is protected by a Tree Preservation Order.</p> <p>With a PTAL of 4, the site is located within a 10 minute walk of Willesden Green underground station and numerous bus services.</p>
Risks	
Design Principles	<p>The police station building contributes positively to the character of Willesden Green Conservation Area and the setting of the adjoining listed buildings. Any proposals for the police station building should include its retention and reuse as well its curtilage walls and structures. In contrast the two residential homes on the west of the plot are out of character with the surrounding area. They also create a break in the active town centre frontage. Any redevelopment of these units or adjoining car parking should be subordinate to the police station building and should not obscure views to or overshadow surrounding buildings. Proposals should look to reunite and harmonise the shopping frontage and respect the domestic scale provided by the terraces in Huddlestone Road.</p> <p>Consistent with the town centre location development should create active frontage at ground floor.</p> <p>Mature trees should be retained and street tree planting and landscaping along the high road reinforced.</p>
Infrastructure Requirements	
Justification	<p>The police station has been long-term vacant but is currently being used by a workspace provider. Workspace is an appropriate use in a town centre location and retaining this use will reinstate an active frontage. The draft London Plan requires Brent to provide additional employment floorspace capacity. Retention of employment floorspace in this location is consistent with the designation of Willesden as a creative hub. This designation is informed by the Brent Workspace Study which identifies demand for workspace within Willesden.</p> <p>In addition to employment floorspace there is scope to provide residential on upper floors, subject to mitigation of potential impacts on amenity.</p> <p>It is considered the loss of the police station building would harm the character of the conservation area and setting of adjoining listed buildings. The current use of the building as workspace demonstrates the building can be brought into use in its current form.</p>

**FIGURE 28 OTHER SITE ALLOCATIONS**

REF.	ADDRESS	SIZE (HA)	EXISTING USE	ALLOCATED USE	INDICATIVE HOMES	COMMENTS
BSESA24	Kilburn Station arches, Exeter Road, NW2 3UH	0.05	Commercial	Commercial uses, including workspace	0	Environmental improvements encouraged
BSESA25	Park Avenue Garages, St Paul's Avenue, NW2 5TG	0.23	Commercial	Residential	70	17/5291 pending decision
BSESA26	Park Avenue North Substation, Marley Walk, NW2 4PY	0.34	Substation	Residential. Potential for self or custom-build	2	Mature trees
BSESA27	Car Wash Strode Road, NW10 2NN	0.06	Commercial	Residential. Potential for self or custom-build	4	
BSESA28	80 Strode Road, NW10 2NH	0.18	Commercial	Mixed-use employment and residential	10	
BSESA29	Willesden Telephone Exchange, 50 Harlesden Road, NW10 2BU	0.37	Commercial	Mixed-use employment and residential	20	
BSESA30	61-65 Shoot Up Hill, London, NW2 3PS	0.3	Commercial, residential and doctor's surgery	Residential and reprovision of doctor's surgery	20	
BSESA31	Turpin's Yard, Oakland Road, London, NW2 6LL	0.4	Employment	Residential and managed affordable workspace	8	Provision of Managed Affordable Workspace in accordance with policy BE3 required.
BSESA32	45-55 Cricklewood Broadway, London, NW2 3JX	0.08	Commercial	Residential and ground floor commercial	10	
BSESA33	123-129 Cricklewood Broadway, London, NW2 3JG	0.07	Commercial and residential	Residential and ground floor commercial	12	
BSESA34	Kilburn Park Underground Station	0.07	Station and Commercial	Stations, ground floor commercial and residential uppers	12	Sensitive location due to proximity of listed buildings, conservation areas and existing station building. Development to be consistent with South Kilburn masterplan SPD contents

**FIGURE 29 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING**

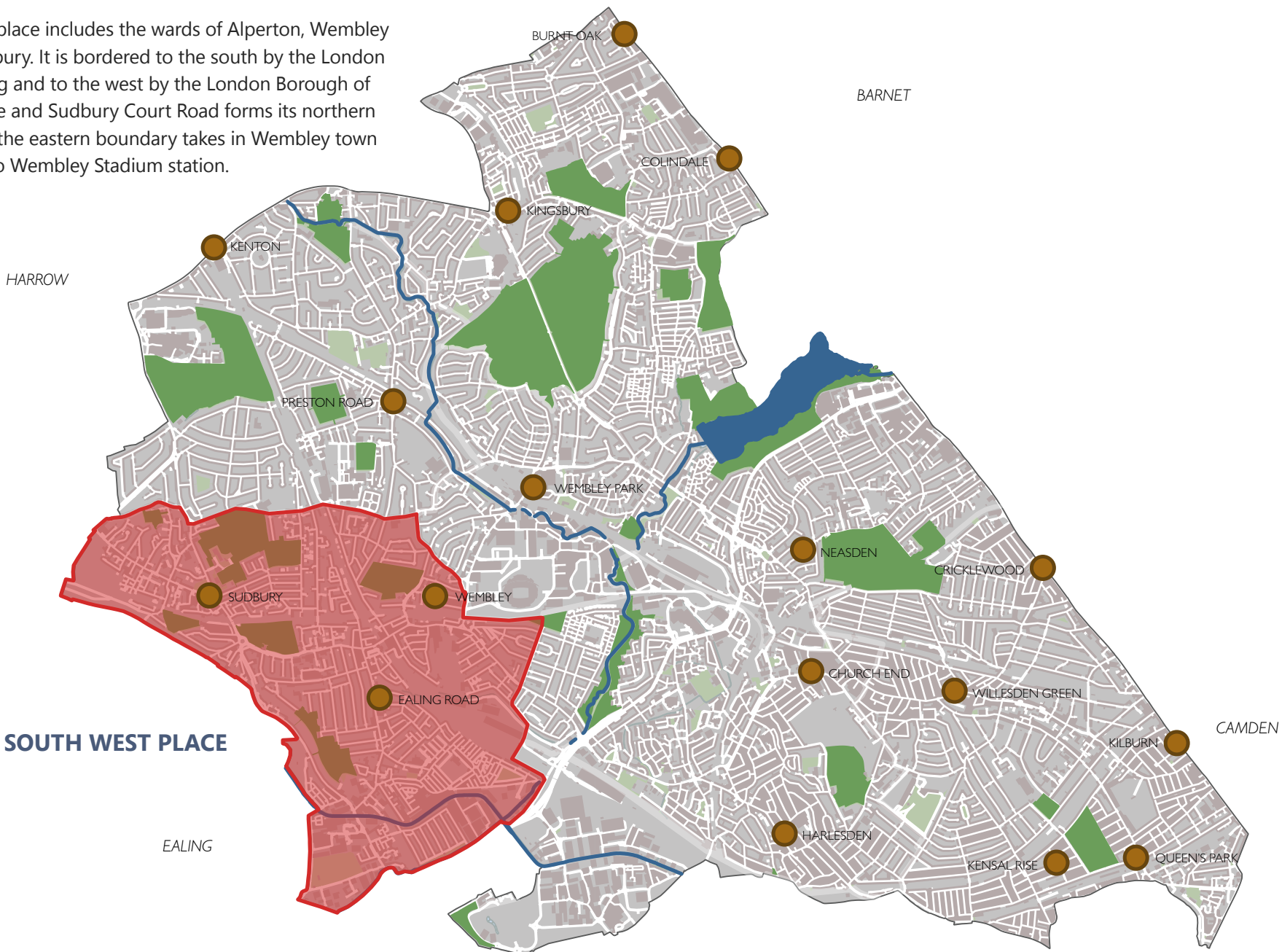
REF.	ADDRESS	SIZE (HA)	EXISTING USE	ALLOCATED USE	INDICATIVE HOMES	COMMENTS
15/3575	Clement Close	0.1	NA	Supported residential	12	Started
15/1892	Summit Court	0.1	NA	Residential & community	11	Started
14/3724	The Tay Building, 2A Wrentham Avenue	0.1	Office	Residential	19	Prior Approval
15/4143	105-109 Salusbury Road	0.1	Office	Residential	19	Prior Approval
14/4254	Former St Mary's Vicarage, Neasden Lane	0.2	Residential	Residential	47	Under construction

## 5.7 SOUTH WEST



## SOUTH WEST

**5.7.1** The South West place includes the wards of Alperton, Wembley Central and Sudbury. It is bordered to the south by the London Borough of Ealing and to the west by the London Borough of Harrow. East Lane and Sudbury Court Road forms its northern boundary, while the eastern boundary takes in Wembley town centre right up to Wembley Stadium station.



**FIGURE 30 MAP OF SOUTH WEST PLACE**



**5.7.2** The South West place is home to Sudbury Town Residents' Association (STRA), which has been designated as the Neighbourhood Forum for the Sudbury Area since 2012. STRA have produced the Sudbury Neighbourhood Plan. It seeks to create a cleaner, greener, safer Sudbury and upgrade Sudbury Town high street. It also highlights the importance of Vale Farm, designating it a Local Green Space, and supports development that results in the strengthening of Vale Farm as a regional centre for sports excellence. Along with the London Plan and Brent Local Plan, the neighbourhood plan contains policies against which planning applications will be considered.

## CHARACTER AND CULTURE

**5.7.3** The South West varies significantly in character. It is principally low-rise 'Metroland' suburban streets within Wembley, Alperton and Sudbury. These contain for the most part detached, semi-detached and terrace houses. There are however two Growth Areas delivering ambitious regeneration in Wembley, centred around the town centre, and Alperton around the underground station and along the Grand Union Canal. The character of these is changing with contemporary developments, often of taller apartment blocks.

**5.7.4** There are several significant open spaces, Barham Park, Vale Farm Local Green Space and King Edward Park found towards the north of this place around Sudbury and Wembley. In addition to this there are several other parks and open spaces in the area including Butler's Green, One Tree Hill Recreation Ground and Alperton Cemetery.

**5.7.5** This area contains several important cultural and heritage assets including the Shree Sanatan Hindu Mandir on Ealing Road, Crabbs House and the Grade II Listed Gardens in Barham Park. The Grade II\* Listed Sudbury Town Station was used as the prototype of Modernist designs for the Piccadilly Line extensions of the early 1930s. Sudbury town itself is home to a number of Grade II Listed buildings and is partly designated as an Archaeological Priority Area.

## TRANSPORT

**5.7.6** This area is well served by public transport, with the Piccadilly line passing through Alperton and Sudbury and the Bakerloo line in Wembley. In addition to the underground, Wembley Central station is served by London Overground, Southern and London Northwestern train services. Sudbury and Harrow Road station is served by the Chiltern Line. Public transport



Sudbury Town tube station located to the south. Sudbury has one of the highest proportions of night-time economy uses (behind only Wembley Park). Its size however means that this offer only addresses local needs.

## EMPLOYMENT AND EDUCATION

**5.7.12** The South West has a number of large industrial employment areas within the Alperton area. This includes a Strategic Industrial Location along the North Circular Road. In addition there are some extensive areas of Locally Significant Industrial Sites off the Ealing Road. Wembley historically had a very large office offer, since the 1990s this role has diminished, but it is still an important component of the jobs on offer in the place, together with retailing, hospitality and public sector. The area has a good representation of primary and secondary schools, whilst there are no further education sites.

CHALLENGES	OPPORTUNITIES
<ul style="list-style-type: none"> <li>• Wembley and Sudbury town centres have a relatively high vacancy rate in comparison to Brent as a whole</li> <li>• Ealing Road and Sudbury have a high proportion of betting shops on the high street. The proportion in Wembley is also quite high</li> <li>• Permitted development schemes have reduced the effectiveness of Alperton regeneration and can be damaging to public realm</li> <li>• Low PTAL levels in some areas in need of regeneration</li> <li>• Fragmented land ownership complicates comprehensive regeneration strategies for Wembley and Alperton</li> <li>• Residential development is leading to the loss of key industrial sites now regarded as being desirable to retain to support employment</li> <li>• Transport links need to be improved in southeast of the area</li> <li>• Transport and parking issues – knock on effect from Wembley to Sudbury particularly on event days</li> </ul>	<ul style="list-style-type: none"> <li>• Wembley has highest level of employment in Brent</li> <li>• Wembley has a relatively high level of night-time economy uses. This could be tied in with Wembley Park which has the highest level in the borough currently to support the London important night time economy/ cultural role of Wembley.</li> <li>• Specialist Indian shops on Ealing Road act as a draw from further afield – promoting this distinctive offer more widely could improve its prospects</li> <li>• Continue planned comprehensive regeneration of Alperton, creating a gateway to the area via new development proposed around Minavil House</li> <li>• Chiltern line services to central London and Oxford could improve transport links from the southwest of this place</li> <li>• Opportunities for proposals that result in the improvement and enhancement of Vale Farm Sports Centre</li> <li>• Large areas of open space, popular and good quality suburban housing around Sudbury providing a high quality of life</li> </ul>

SUDBURY COTTAGES  
CONSERVATION AREA

WEMBLEY HIGH ST  
CONSERVATION AREA

SUDBURY & HARROW ROAD

SUDBURY

WEMBLEY

WEMBLEY CENTRAL

SUDBURY TOWN

BUCK LANE  
CONSERVATION AREA

LEALING RD

ALPERTON

ALPERTON NORTH LSIS










NORTHFIELDS EAST SIL

ALPERTON CENTRAL LSIS

NORTHFIELDS WEST SIL

ALPERTON SOUTH LSIS

FIGURE 31 HIGH LEVEL PLAN OF THE PLACE

-  Conservation Area
-  Intensification Corridor
-  Open Space
-  Key Employment Sites
-  Waterway
-  London Underground Station
-  London Overground Station
-  National Rail Station
-  Town Centre



## VISION

**5.7.13** The South West of the borough will be a place which combines its suburban metro-land neighbourhoods with pockets of new development. New high density mixed use development will be focused in the Wembley Growth Area within and adjacent to the town centre and Alperton Growth Area around the underground station and along the Grand Union Canal. Wembley will continue to be Brent's main town centre and positively adapt to meet the challenges of changes in shopping patterns. The cultural heritage of Ealing Road and the Shree Sanatan Hindu Mandir will be enhanced and promoted to create a specialist retail hub.

## PREFERRED POLICY OPTION: BP7 SOUTH WEST

Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:

### CHARACTER, HERITAGE AND DESIGN

- a. **Conserving and enhancing heritage assets including the Shree Sanatan Hindu Mandir on Ealing Road and the listed buildings and gardens of Barham Park.**
- b. **Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD1) in the Growth Areas of Wembley and Alperton and elsewhere in the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road and Sudbury and Ealing Road town centres where up to 15-18 metres (5-6 storeys) could be appropriate.**
- c. **Creating a strong link between Wembley and Wembley Park town centres through public realm and junction improvements and new development to the east of Wembley Triangle, forming a continuous active frontage between the two centres.**

### HOMES

- d. **Continuing residential-led mixed-use development within the Wembley and Alperton Growth Areas, the Ealing Road and Sudbury town centres and intensification corridors.**
- e. **Co-locating residential uses on areas of industrial and employment land**

**within the Alperton Growth Area, taking advantage of areas well-served by public transport. Where alternative uses are co-located on industrial sites this will be as part of a comprehensive regeneration scheme which ensures no net loss of industrial floorspace.**

### TOWN CENTRES

- f. **Protecting and enhancing the retail function of Wembley town centre by clearly defining acceptable ground floor uses and maintaining a strong retail core on the high road.**
- g. **Providing a quality, diverse retail offer in Wembley town centre by providing for an additional 4,300sqm of A3 food and drink and A4 pubs/drinking establishments floorspace particularly in secondary shopping frontages to further support an evening economy and support the centre's potential change in status to a metropolitan centre in the London hierarchy.**
- h. **Promoting uses which enhance and diversify the cultural and commercial leisure offer, particularly those which provide 'family entertainment'.**

### EMPLOYMENT AND SKILLS

- i. **Encouraging the intensification of existing Strategic Industrial Locations and Locally Significant Industrial Sites around Alperton.**
- j. **Introducing mixed-use development to employment sites around the junction of Ealing Road and Bridgewater Road.**
- k. **Increasing the supply of workspace in Wembley and Alperton including managed affordable workspace as set out in Policy BE3**

### COMMUNITY AND CULTURAL FACILITIES

- l. **Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities.**
- m. **Providing significant new social infrastructure as part of the Northfields development including a new health centre.**
- n. **Improvement and enhancement of the Vale Farm and its Sports Centre**

### OPEN SPACE AND BIODIVERSITY

- o. **Supporting all development with a canalside frontage to create better**

**pedestrian/cycle links along the Grand Union Canal in Alperton**

- p. Maintaining and enhancing Barham Park and the listed gardens, creating a well-used public space**
- q. Providing high-quality open space as part of major developments, accessible to both new and existing communities**

## TRANSPORT

- r. Supporting permeable development in Alperton that contains pedestrian and cycle routes to easily move through the area, including the creation of an east-west cycle route and pedestrian access along the canal**
- s. Prioritising public transport use and associated improvements in the Alperton and Wembley Growth Areas**
- t. Supporting the construction of a new bridge as part of the Northfields Industrial Estate regeneration to connect new development on both sides of the River Brent**

## JUSTIFICATION

### CHARACTER, HERITAGE AND DESIGN

- 5.7.14** Much of this area has a strong suburban character dominated by two storey detached and semi-detached homes built during the early 20th century. Tall buildings will be appropriate and concentrated in the major regeneration areas along Wembley High Road and around Alperton Station along the Grand Union Canal towards the former Northfields Industrial Estate. In recent years a number of tall buildings have come forward in these areas to create a new urban character, contributing greatly to Brent's housing needs.
- 5.7.15** Outside these regeneration areas building height will more reflective of the local context. Town centres and intensification corridors will provide the opportunity for some additional height of up to 15-18 metres (5-6 storeys). Elsewhere development will be expected to come forward at levels not significantly higher than existing two and three storey developments.

### HOMES

- 5.7.16** The majority of new housing in the South West place will take place in Wembley and Alperton Growth Areas. These will provide opportunities for new mixed-use developments with a significant amount of employment

and residential floorspace. A masterplanning exercise will be undertaken for the Locally Significant Industrial Sites (LSIS) around Alperton station to identify the appropriate mix of uses and form of development. This will be with a view to improving employment opportunities, whilst also providing for additional homes. Given the high capacity for new homes these sites offer, it is likely there will need to be some social infrastructure provided. Masterplanning will identify these requirements. New social infrastructure facilities will also be provided as part of the Northfields development.

- 5.7.17** Prior to the adoption of a masterplan for the LSIS, small-scale development will be resisted. This is to prevent any piecemeal development reducing the potential of the sites that would otherwise be achieved through comprehensive redevelopment.
- 5.7.18** Outside these large-scale regeneration sites there are several smaller development opportunities which could contribute to Brent's housing need. Development of inappropriate town centre uses in Sudbury, plus increased intensity of use of town centre sites will play an important role. There are also smaller underutilised plots across the southwest of the borough could provide significant housing numbers without harming the suburban character of Brent.

### TOWN CENTRES

- 5.7.19** Wembley's role as the principal town centre within Brent will be sustained. Reflecting the need to continue its shopping role, retailing will be predominantly focussed on the primary shopping frontage. The role of the centre has been and is likely to continue to evolve due to increased competition from adjacent town centres and internet shopping. As such planning applications which seek to enhance and diversify the cultural, commercial leisure and night-time economy offer of Wembley will be considered positively. This is subject to being of an appropriate scale and addressing amenity considerations. In particular there is scope in terms of needs for Wembley to accommodate 'family entertainment' and leisure facilities such as bowling and climbing walls. These type of activities are a good fit with the existing offer, potentially enhancing Wembley's catchment. The enhancement of the night-time economy (i.e. late-night restaurants/ bars/ nightclubs) will be supported subject to issues relating to amenity, licencing and public safety being satisfied.

**5.7.20** Active frontages should be maintained but also incorporated into all new development on the principal pedestrian route along Wembley High Road between Wembley and Wembley Park town centres. Where the market may be unlikely to support retailing uses, other uses such as workspace that can provide an active frontage will be sought. An investment in wayfinding and public realm improvements would assist in overcoming the current separation between the 'historic' town centre on the High Road and 'new' centre around the London Designer Outlet. The effective joining of Wembley Park and Wembley' town centres through the development around the stadium, plus the volume of retail, leisure and commercial floorspace creates the potential for Wembley to become a metropolitan centre in future London Plans.

**5.7.21** There is no requirement for additional comparison or convenience goods provision within or on the edge of Ealing Road town centre. Development of a scale appropriate scale which enhances existing provision and strengthens the role and function of the centre, particularly of its niche Indian focus will be supported. Opportunities to increase links to Wembley town centre given the close functional relationship between the two will be supported. Provision of commercial ground floor uses and active frontages will be sought in proposed development within the intensification corridor between the two.

## EMPLOYMENT AND SKILLS

**5.7.22** Alperton (South) LSIS land will be protected for solely employment uses within use class B1c, B2, B8 and all closely related sui generis uses and where possible its use intensified..

**5.7.23** Redevelopment of existing industrial floorspace and provision of new employment floorspace in mixed-use development (co-location) will be accepted in the Growth Area on LSIS around the junction of Ealing Road and Bridgewater Road where set out in site allocations. This will be subject to a comprehensive masterplan approach. Small-scale piecemeal development in advance of the masterplan and that which would compromised maximum efficiency of land use will be resisted.

## COMMUNITY AND CULTURAL FACILITIES

**5.7.24** Due to high levels of population growth from new development in South

West there will be a need for significant new community and cultural facilities. A health centre will be provided as part of the Northfields Industrial Estate regeneration scheme. It will be located to the west of the site in order to best meet the needs of new and existing residents.

**5.7.25** The Sudbury Neighbourhood Plan supports development that results in the strengthening of Vale Farm as a regional centre for sports excellence. The existing leisure centre is coming to the end of its useful life. It will soon require significant investment to ensure it is fit for purpose in the future. The council supports the ambition of improving Vale Farm. It will explore all options of how this can be achieved within the financial parameters available to it.

## OPEN SPACE AND BIODIVERSITY

**5.7.26** The north of this place is well-served in terms of open space, with the extensive area of Vale Farm identified as a Local Green Space. This designation is equivalent to Green Belt in national policy in terms of its level of protection. There are however, some areas of deficiency around Alperton and just south of Wembley Central. New development in these Growth Areas should comprehensively plan to delivery significant open space where possible to reduce this deficiency.

**5.7.27** Within large new developments open space will need to be provided in line with London Plan and Brent borough standards, offering a mix of green space and community meeting space. Existing small open spaces will be protected and where possible enhanced given the deficiency in large open spaces in the south of this place.

## TRANSPORT

**5.7.28** The high levels of population growth planned in this area will place additional pressure on the existing transport network. Where possible development will encourage residents to avoid private vehicle use. New cycle and pedestrian routes will be created to improve east-west connections. Redevelopment of sites along the canal offer an excellent opportunity to create new east-west pedestrian and cycle links between Northfields and Alperton station.


**5.7.29** Future upgrades to the Piccadilly and Bakerloo lines will increase capacity

and range of this area's transport links. Whilst developments will be expected to address increasing the quality of bus services where relying on that to increase their accessibility by non-car modes.

**5.7.30** Junction and other road improvements will be made to mitigate the impacts of development in and around Alperton Growth Area. The creation of a new bridge connection between Northfields Industrial Estate and the area to the south of the River Brent would greatly improve connectivity in this area.



## BSWSA1 ALPERTON INDUSTRIAL SITES

<p>Site Plan</p>			
Existing Use	Industrial and commercial		
Allocated Use	Mixed-use scheme co-locating residential units with existing industrial and commercial uses		
Indicative Capacity	Not yet known, subject to a masterplanning process which will provide additional clarity.		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	650	350	200
Address	Bridgewater Road and Ealing Road, Alperton		
Area	Alperton House (2.19ha), Bridgewater Road (1.45ha) and Minavil House/ Wharfside (1.75ha) – 5.39ha in total		



Description of Existing Site	<p>The allocation area comprises three parcels of industrial land and the site known as Minavil House covered by planning permission 16/2629.</p> <p>Land to the west of Bridgewater Road contains various commercial and industrial uses as well as The Boat public house. This site is made up of four land parcels; Alperton House, The Boat, Abercorn Commercial Centre and Jewson. The westernmost businesses are low rise industrial sheds with associated parking while Alperton house rises to six storeys of office accommodation.</p> <p>The northernmost parcel to the east of Bridgewater Road comprises Alperton Bus Garage, a UKPN substation, low rise industrial units and a car wash. This northern boundary of this site is formed by an adjacent railway line served by the Piccadilly Line, connecting at Alperton Station immediately next to this allocation.</p> <p>Land to the south of Ealing Road includes the permitted Minavil House scheme and Wharfside industrial units. The Grand Union Canal forms the southern boundary of this site, as well as that of the land to the west of Bridgewater Road. The industrial units which form Wharfside Industrial Estate are generally in better condition than those across the rest of the allocated area.</p>
Ownership	Private; multiple ownership
Planning History	Application 16/2629 to demolish existing two storey commercial buildings to the south of Ealing Road and replace them with a mixed-use development ranging from 10 to 26 storeys, comprising 251 residential units, 1,942sqm retail foodstore on the ground floor, 622sqm office space on the first floor, 634sqm retail floorspace for flexible use as a café, bar or restaurant at lower ground floor and ground floor level.
PTAL Rating	3-5 (2031 estimate)
Planning Considerations	<p>The sites are within Alperton Growth Area, and have been partially allocated for development previously, albeit at much lower densities than currently proposed. Excluding the site of The Boat public house, these sites are all designated as Locally Significant Industrial Sites and therefore, in line with London Plan requirements, there must be a net increase in employment floorspace across the sites. The configuration of employment floorspace will be agreed as part of the forthcoming masterplan process.</p> <p>The site contains no recognised heritage assets, however Alperton Station is Locally Listed and any future development must take care to preserve and enhance its heritage value.</p> <p>Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. Potential noise associated with the roads and adjacent employment uses will have to be addressed in design of development.</p> <p>The railway line along the northern boundary of the sites is designated as a wildlife corridor. Development should take care to protect this area from any works which would compromise its biodiversity. There are a number of mature trees across the sites which should be retained where possible.</p> <p>The southern boundary along the Grand Union Canal will need an appropriate set back, landscaping and public access as part of a wider connection along the northern side of the canal.</p>
Risks	Land is in multiple ownership, although risk can be mitigated through the production of a comprehensive masterplan for the area. Industrial units are generally well occupied, therefore development must ensure minimal disruption to existing businesses.
Design Principles	<p>Given the height of the permitted Minavil House scheme and surrounding buildings including Peppermint Heights and residential development on the south side of the Grand Union Canal, these sites are deemed suitable to continue the cluster of tall buildings around Alperton Station in line with London Plan guidance. Tall buildings should be centred on the junction of Ealing Road and Bridgewater Road, stepping down towards the peripheries of the sites where in some cases it is likely that adjacent two storey residential properties will remain.</p> <p>Alperton Station should be well connected to or integrated into new development, providing a high quality public realm/ pedestrian/ cyclist environment. The sites to the east of Bridgewater Road must take account of the significant noise constraints created by the adjacent railway line.</p> <p>The Minavil House site should come forward in line with principles set out as part of planning permission 16/2629.</p> <p>Active frontages should be created where development is adjacent to a road and along the open spaces north of the canal.</p>
Infrastructure Requirements	Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site.
Justification	These sites are generally low density Locally Significant Industrial Sites which have not maximised their development potential. This allocation would allow these underutilised sites to contribute to Brent's housing numbers within the designated Alperton Growth Area, as well as increasing provision of industrial floorspace in line with London Plan requirements. The site's proximity to Alperton Station make it an excellent location for residential use in addition to the existing industrial and commercial activity. Redevelopment of the sites bordered by the Grand Union Canal will allow for a continuation of the high quality canal side development planned to the east in further sites allocated for development.

## BSWSA2: SAINSBURY'S ALPERTON




Site Plan

Existing Use	Supermarket with associated car park and petrol station		
Allocated Use	Replacement/ maintain existing superstore with residential on remainder of site		
Indicative Capacity	200		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
			200


Address	360 Ealing Road HA0 1PF
Area	2.6ha
Description of Existing Site	The site is currently to the west a Sainsbury's supermarket with associated retail uses within it, a petrol filling station to the east and store car parking between. It is bounded by the Ealing Road on the east, Glacier Way to the south, industrial premises to the west and a mixture of the Grand Union Canal and residential development to the north.
Ownership	Private
Planning History	None of significance to the allocation since the site was built.
PTAL Rating	4
Planning Considerations	<p>The site is within the Alperton Growth Area with a reasonable level of public transport accessibility and consistent with London Plan provides the opportunity for a more intensive use of the site, ideally through a vertically mixed use development of store/ supporting uses and residential above.</p> <p>The store is in an out of centre location and trading well. There are no sequentially preferable locations available in Brent's town centres locally that could accommodate the store. Therefore a retention of a supermarket of similar size on site would be sought. As an out of centre site, sequentially it is not the preferred location for additional retail space/ town centre uses. Any such additional space will need to pass the sequential test and impact assessment.</p> <p>The site is within an air quality management area, so development will need to be air quality positive as it is within a Growth Area.</p> <p>The canal is a part of a green chain, so it would be beneficial to support this function with an additional planting scheme along this edge.</p> <p>An active frontage along Ealing Road would be desirable as well as positive frontages along Glacier Way and the Grand Union Canal.</p> <p>The existing petrol station if kept or removed will have to be satisfactorily addressed in terms of impacts on potential residents.</p> <p>Tall buildings will be appropriate on this site, taking its cue from the scale of immediately adjacent heights.</p> <p>A small amount of the site is susceptible to surface water flooding, predominantly on highway land off Glacier Way. There is moderate susceptibility to ground water. The site is not in Floodzone 3 for fluvial flooding. As the site is over one hectare a site specific flood risk assessment will be required.</p> <p>The site is located on an historical industrial site. A Preliminary Risk Assessment for contamination will be required, and if necessary remediation. The site is located within an Air Quality Management Area. As such, development at this site should be at least air quality neutral.</p> <p>Noise associated with the continued industrial use, or intensification of employment uses on the adjacent sites, plus the operation of the supermarket will need to be addressed in the design of development. The use of Glacier Way as a TfL bus stand will also need to be taken into account.</p> <p>Ealing Road is a London Distributor road. A transport assessment for the site will be required to determine the impact that development at this site will have on the transport network.</p>
Risks	Desire of Sainsbury's to develop given the current comparative operational successful of the store
Design Principles	<p>Tall buildings will be appropriate on this site, taking its cue from the scale of immediately adjacent heights.</p> <p>Active frontage should be created along Ealing Road and Glacier Way, with the Northwick Road positively addressed. Ideally any replacement superstore will place its public entrance closer to Ealing Road, the main 'box' surrounded by smaller retail/commercial units or residential to remove the potential for dead frontage.</p> <p>There may be an opportunity to realign Northwick Road to create better development parcels/ place.</p>
Infrastructure Requirements	No specific infrastructure requirements identified.
Justification	The site is located in a Growth Area with good excellent public transport accessibility levels and will be adjacent to high density development. The existing use is at low intensity being single storey and surrounded with extensive surface level car parking. Part Sainsbury's land has previously been developed for housing. The opportunity exists to intensify use of the identified site to assist meeting housing needs whilst retaining the retail floorspace which serves the local population and improving townscape.

## BSWSA3 ATLIP ROAD

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Commercial/employment use</p>		
<p>Allocated Use</p>	<p>Mixed-use residential-led scheme, re-providing along Ealing Road the range of town centres uses within the Atlip Centre and also the Church of God Prophecy.</p>		
<p>Indicative Capacity</p>	<p>335</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
<p>Address</p>	<p>86 249 Atlip Road, Alperton, HA0</p>		


Area	1.16ha
Description of Existing Site	The site comprises a mix of retail and commercial uses including restaurants, a banqueting suite that needs the Indian community's needs for large function space associated with weddings and festivals, a gym, a community church and associated car parking. There is also a former cash & carry. To the north the site boundary runs along Ealing Road and behind new mixed-use development, with the Piccadilly Line railway forming the western boundary. To the south of the site there is a modern development comprised of taller apartment blocks completed in 2011 as part of the previous Atlip Road A4 site allocation. Alperton underground station is located directly opposite the site along with a number of small retail units along Ealing Road.
Ownership	Private
Planning History	Approved application 15/2061 not yet implemented for the proposed demolition of existing former retail warehouse building and erection of development comprising a part 3 storey to part 10 storey building of 99 residential units
PTAL Rating	3-5
Planning Considerations	<p>The site is allocated for residential led mixed use development. This includes a place of worship which must be re-provided at least to an equivalent scale/ quality in any redevelopment. The banqueting suite at the Atlip Centre is also a facility which meets a local community need related to function spaces for Indian weddings/ cultural events. As this contributes towards the Ealing Road niche town centre offer as set out in the vision it should be replaced. In addition some retail/ main town centre uses will require inclusion within the scheme to provide an active frontage along the Ealing Road.</p> <p>The site is appropriate for high density development including tall buildings in part (as shown by the existing consent for 10 storeys) but any redevelopment must provide a comfortable relationship with adjacent residential development which is likely to remain, particularly the two storey properties along Sunleigh Road.</p> <p>The site contains no recognised heritage assets, however Alperton Station is Locally Listed and any future development must take care to preserve and enhance its heritage value.</p> <p>An adoptable standard road will need to be provided to connect up with the development to the south currently served by Atlip Road.</p> <p>The railway line along the northern boundary of the sites is designated as a wildlife corridor. Development should take care to protect this area from any works which would compromise its biodiversity. It will also need to deal satisfactorily with the noise impacts of the railway.</p>
Risks	Impact on businesses.
Design Principles	<p>Building height and massing should build upon the established rhythm in this part of the Alperton regeneration scheme, corresponding to the neighbouring buildings and stepping down towards the east of the site. .</p> <p>Development along Ealing Road should provide an active frontage to continue the road line of the retail units to the east of this site. If Atlip Road is realigned, a clear and obvious inviting pedestrian/ cycle route from Ealing Road to the canal must exist, with active frontage overlooking it. If Atlip Road is realigned it should have positive frontages addressing it. The properties along Sunleigh Road must have defensible space/ should not have rear fences along any public realm.</p>
Infrastructure Requirements	The church and community centre and banqueting hall should be reprovided as part of any future development in line with policy BSI1 Social Infrastructure and Community Facilities.
Justification	This site is generally comprised of low density commercial and retail uses which have not maximised the development potential of the area. This allocation would allow this site to contribute to Brent's housing numbers within the designated Alperton Growth Area, continuing development which has come forward as part of the previous Atlip Road allocation. The site's proximity to Alperton Station make it an excellent location for residential use.

## BSWSA4 SUNLEIGH ROAD

<p>Site Plan</p>			
Existing Use	Industrial		
Allocated Use	Mixed-use residential led development incorporating some replacement workspace at ground floor level and potential commercial leisure use to take advantage of/ enhance the canal setting.		
Indicative Capacity	395		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	198	197	
Address	Sunleigh Road, Alperton, HA0		
Area	1.9ha		
Description of Existing Site	The site is comprised of low level industrial and commercial units		
Ownership	Private		

Planning History	<p>18/0418 Prior approval for change of use from offices (Use class B1(a)) to residential (Use class C3) involving the creation of 23 x studio flats</p> <p>18/0320 Demolition of the existing building and redevelopment of the site with nine dwellinghouses comprising a terrace of seven three-storey townhouses (5 x 3 bed and 2 x 4 bed) and two detached bungalows (2 x 2 bed) each with private gardens and associated car parking, landscaping, refuse and bike storage</p>
PTAL Rating	2-3 (2031 estimate)
Planning Considerations	<p>The site sits within Alperton Growth Area and forms part of the wider regeneration scheme outlined in the Alperton Masterplan Supplementary Planning Document. The site was allocated for development previously albeit at a lower density than currently proposed.</p> <p>Two parcels within this allocation have planning permission (ref 18/0418 and 18/0320) to provide relatively low levels of development. Further development should come forward at higher densities in line with neighbouring allocations and the wider Alperton regeneration area.</p> <p>The site has a low PTAL of 2-3 (2031 estimate) although this is likely to rise given the high levels of development currently proposed for the area.</p> <p>The site's location adjacent to the Grand Union Canal requires development to be in conformity with policy BGI1 Green and Blue Infrastructure in Brent which requires developments adjoining the borough's Blue Ribbon network to pursue opportunities to improve public accessibility and its setting in relation to buildings and public realm. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath.</p> <p>A new connecting homezone/pedestrian and cyclist street to the adjacent Atlip Road site to the west must be provided that creates a high quality direct route through site to link up with the same type of route in the adjacent Abbey Manufacturing Site Allocation. Publically accessible walking/ cycling routes through the development must be provided from Sunleigh Road and Woodside End to link to the new east/ west pedestrian/ cycle route, canal footbridge on Atlip Road and any new towpath/ route along the northern edge of the canal across the site.</p> <p>A small number of mature trees are located within the allocated area and should be retained where possible.</p> <p>Mid-rise tall buildings will be appropriate on this site subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing being delivered with existing residential properties.</p> <p>Given that the site is existing employment land and Brent's status as a provide capacity borough, some re-provision of employment floorspace along the ground floors of the new buildings will be required.</p> <p>Piecemeal development of the site will not be allowed in advance of a masterplan/ agreement between landowners on how the site will be developed comprehensively to provide a coherent development overall.</p> <p>New moorings will be required.</p>
Risks	Impact on businesses, multiple ownership creating piecemeal development.
Design Principles	<p>This site is suitable for mixed-use development similar to the adjoining scheme on Atlip Road completed in 2011.</p> <p>Flexible light industrial/maker workspace should be provided at ground floor level creating an active frontage to routes through the site and frontage along the canal frontage where commercial leisure use to increase activity on the canal would be desirable.</p> <p>The site is appropriate for tall buildings of a mid-rise nature that provides a satisfactory relationship in terms of scale and massing in relation to existing residential properties that will remain should be provided.</p> <p>A clear and direct appropriately landscaped home zone route that gives priority to cyclists and pedestrians should be set out to promote greater permeability/connectivity through the site for cyclists and pedestrians in particular, suppressing the desire potential for rat-running of vehicles from adjacent areas.</p> <p>Development should be set back from the canal to promote a high quality landscaped publically accessible east/west route/ towpath in which opportunities for access to the canal be enhanced.</p>
Infrastructure Requirements	A publically accessible route adjacent to the canal side. A direct and high quality homezone route that links the site to Atlip Road and into the adjacent BSWSA5 site, to create a continuous route through to Mount Pleasant.
Justification	This site is generally comprised of low density commercial and industrial uses which have not maximised the development potential of the area. This allocation would allow this site to contribute to Brent's housing numbers within the designated Alperton Growth Area, continuing development which has come forward on neighbouring sites and the immediate area. The site's proximity to Alperton Station make it an excellent location for residential use.


## BSWSA5 ABBEY MANUFACTURING ESTATE

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Industrial</p>		
<p>Allocated Use</p>	<p>Mixed-use residential-led development incorporating replacement employment space, small scale retailing/ commercial leisure and community uses (e.g. nursery).</p>		
<p>Indicative Capacity</p>	<p>517</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>159</p>	<p>258</p>	<p>100</p>
<p>Address</p>	<p>Abbey Manufacturing Estate, Mount Pleasant, Wembley, HA0 1NR</p>		
<p>Area</p>	<p>2.63ha</p>		
<p>Description of Existing Site</p>	<p>The site forms a large industrial estate comprising around 60 industrial/ warehouse units, predominantly car repair businesses. The site extends from the northern towpath of the Grand Union Canal in the south to the rear garden boundaries of houses fronting Mount Pleasant and Woodside Close in the north and east. The site also bounds the under-construction Abbey Wharf residential development to the east and residential properties fronting Woodside Place and Woodside End to the west.</p>		




Ownership	Private
Planning History	No relevant planning history
PTAL Rating	2-3 (2031 estimate)
Planning Considerations	<p>The site sits within Alperton Growth Area and forms part of the wider regeneration scheme outlined in the Alperton Masterplan Supplementary Planning Document. The site was allocated for development previously albeit at a lower density than currently proposed.</p> <p>The site has a low PTAL of 2-3 (2031 estimate) although this is likely to rise given the high levels of development currently proposed for the wider area.</p> <p>The site's location adjacent to the Grand Union Canal requires development to be in conformity with policy BGI1 Green and Blue Infrastructure in Brent which requires developments adjoining the borough's Blue Ribbon network to pursue opportunities to improve public accessibility and its setting in relation to buildings and public realm. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath.</p> <p>A new connecting homezone/pedestrian and cyclist street to the adjacent BSWSA4 site to the west must be provided that creates a high quality direct route through the site to link to Mount Pleasant on the east. Publically accessible walking/ cycling routes through the development must be provided from Woodside Close and Woodside End to link to the new east/ west pedestrian/ cycle route, canal footbridge on Atlip Road and any new towpath/ route along the northern edge of the canal across the site that links BSWSA3 and the adjacent Abbey Wharf development to the west .</p> <p>Given that the site is existing employment land and Brent's status as a provide capacity borough, some re-provision of employment floorspace along the ground floors of the new buildings will be required as well as other potential uses such as small scale retail, commercial leisure or community uses (e.g. nursery).</p> <p>New moorings will be required.</p>
Risks	Impact on businesses/ multiple land owners creating piecemeal development.
Design Principles	<p>Development coming forward should be denser than the surrounding suburban character and is suitable tall buildings of a mid-rise height, that sits well subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing being delivered with residential properties in the neighbouring Abbey Wharf development which rises to six storeys and the surrounding two storey residential properties elsewhere that are likely to remain. Given the size of the site, development should come forward as part of a comprehensive masterplan and individual schemes which would compromise the most efficient land use of the site will be refused.</p> <p>The existing Woodside Place and Woodside End should be extended into the site providing Homezone type through roads that prioritise pedestrian and cyclist movements. A new connecting Homezone/pedestrian and cyclist street should be provided to the adjacent BSWSA2 site that forms a continuous link between the Atlip Road site to the west and Mount Pleasant. Pedestrian and cycle routes should also link to any new towpath/ route that is also provided along the northern edge of the canal across the site.</p> <p>Flexible light industrial/ maker workspace, plus potential A1 or D1 uses should be provided at ground floor level creating an active frontage to routes through the site and frontage along the canal frontage where commercial leisure use to increase activity on the canal would be desirable.</p> <p>The site is appropriate for tall buildings of a mid-rise nature that provides a satisfactory relationship in terms of scale and massing in relation to existing residential properties that will remain should be provided.</p> <p>A clear and direct appropriately landscaped home zone route/ routes that gives priority to cyclists and pedestrians should be set out to promote greater permeability/ connectivity through the site for cyclists and pedestrians in particular, suppressing the desire potential for rat-running of vehicles from adjacent streets/ areas.</p> <p>Development should be set back from the canal to promote a high quality landscaped publically accessible east/west route/ towpath in which opportunities for access to the canal be enhanced.</p>
Infrastructure Requirements	A publically accessible route adjacent to the canal side. A direct and high quality homezone route that links the site to Atlip Road to create a continuous route through to Mount Pleasant.
Justification	This site is generally comprised of low density commercial and industrial uses which have not maximised the development potential of the area. This allocation would allow this site to contribute to Brent's housing numbers within the designated Alperton Growth Area, continuing development which has come forward on neighbouring sites and the immediate area. The site's proximity to Alperton Station make it an excellent location for residential use.

## BSWSA6 BERESFORD AVENUE

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Industrial</p>		
<p>Allocated Use</p>	<p>Mixed-use residential-led development incorporating employment uses.</p>		
<p>Indicative Capacity</p>	<p>135</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>135</p>		
<p>Address</p>	<p>Beresford Avenue, Alperton, HA0</p>		
<p>Area</p>	<p>0.96ha</p>		


Description of Existing Site	The site forms an industrial estate comprising various warehouse units and office buildings of poor quality. Beresford Avenue runs along the northern boundary of the site with the Grand Union Canal forming the southern boundary. The site is adjacent to the under-construction Abbey Wharf residential development to the west and joins the forthcoming Northfields development to the east.
Ownership	Private
Planning History	18/0752 for the demolition of existing buildings at Afrex House, and redevelopment to provide a residential development of 3-5 storeys for 31 residential units (9 x 1bed, 18 x 2 bed, 4 x 3 bed), creation of public realm and alterations, landscaped amenity space, car and cycle parking and all associated works. Prior approvals in the Liberty Centre
PTAL Rating	1a-2 (2031 estimate)
Planning Considerations	<p>The site sits within Alperton Growth Area and forms part of the wider regeneration scheme outlined in the Alperton Masterplan Supplementary Planning Document. The site was allocated for development previously albeit at a lower density than currently proposed.</p> <p>The site has a low PTAL of 2-3 (2031 estimate) although this is likely to rise given the high levels of development currently proposed for the wider area.</p> <p>The site's location adjacent to the Grand Union Canal requires development to be in conformity with policy BGI1 Green and Blue Infrastructure in Brent which requires developments adjoining the borough's Blue Ribbon network to pursue opportunities to improve public accessibility and its setting in relation to buildings and public realm. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath.</p> <p>A new connecting towpath/ route along the northern edge of the canal across the site that links to BSWSA5 and the adjacent Northfields.</p> <p>Given that the site is existing employment land and Brent's status as a provide capacity borough, some re-provision of employment floorspace along the ground floors of the new buildings will be required as well as other potential uses such as small scale retail, commercial leisure or community uses (e.g. nursery). New moorings will be required.</p>
Risks	Prior approvals and piecemeal development risk efficient land use and access for future development.
Design Principles	<p>Development coming forward should be denser than the surrounding suburban character and is suitable tall buildings of a mid-rise height (potentially up to 6 storeys), subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing being delivered with the surrounding two storey residential properties that are likely to remain on Beresford Avenue.</p> <p>Flexible light industrial/ maker workspace, plus potential A1 or D1 uses should be provided at ground floor level.</p> <p>Proposals should seek to introduce active frontages along Beresford Avenue and the canalside. Development should be set back from the canal to promote a high quality landscaped publically accessible east/west route/ towpath in which opportunities for leisure access to the canal be enhanced.</p> <p>The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath.</p>
Infrastructure Requirements	A publically accessible route adjacent to the canal side.
Justification	This site is generally comprised of low density commercial and industrial uses which have not maximised the development potential of the area. This allocation would allow this site to contribute to Brent's housing numbers within the designated Alperton Growth Area, continuing development which has come forward on neighbouring sites and the immediate area.

## BSWSA7 NORTHFIELDS

<p>Site plan</p>			
Existing Use	Industrial		
Allocated Use	Mixed-use residential-led scheme		
Indicative Capacity	2900		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	752	750	1398
Address	Northfields Industrial Estate, Beresford Avenue, Wembley, HA0 1NW		
Area	9.16ha		

<p>Description of Existing Site</p>	<p>The site is located to the south of Beresford Avenue and north of the A406 North Circular Road at the east of Alperton. The Grand Union Canal runs to the south western edge of the site, and the River Brent runs through the site, dividing it into two parcels. The site has a total area of 9.16ha, the majority of which is to the north of the River Brent (8.1ha), while the smaller southern part has an area of 1.06ha.</p> <p>The site comprises brownfield land which was formerly in use as an industrial estate, most recently accommodating a range of low density uses such as car workshops, car dealers, storage, and industrial uses. Much of the site has previously been cleared (and used as open air storage) and comprises areas of hardstanding, although there are some vacant predominantly single and two storey commercial buildings to the centre and western part of the site, and three industrial units remain along Beresford Avenue and are currently occupied under different ownership. There is also a temporary information centre with associated parking that is accessed from Beresford Avenue towards the west of the site.</p> <p>Stonebridge Park station is approximately a 1km walk along Beresford Avenue and the Old North Circular Road to the north east of the site and Alperton Underground station is approximately a 1.5km walk along Mount Pleasant and Ealing Road to the west, and there are local bus stops on Beresford Avenue and the North Circular Road.</p>
<p>Ownership</p>	<p>Private</p>
<p>Planning History</p>	<p>Approved application 18/0321 is a hybrid planning application for the comprehensive redevelopment of the industrial estate. The scheme proposes demolition of all existing buildings on site and the delivery of a mixed-use development including 2,900 homes, up to 2,300sqm commercial floorspace, a minimum of 17,581sqm and up to 19,000sqm employment floorspace and 1,610sqm community and assembly and leisure floorspace (use classes B1a, B1c and B8), up to 2,900sqm community and assembly and leisure floorspace (uses classes D1 and D2), an energy centre, public and private open space, new routes and public access along the River Brent and Grand Union Canal, parking and cycle provision and new site access and ancillary infrastructure.</p>
<p>PTAL Rating</p>	<p>0-3 (2031 estimate). May be revised in light of new development</p>
<p>Planning Considerations</p>	<p>The majority of the site (with the exception of a small area at the north-west) is part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan. The north-west part that is not SIL land is a non-designated Local Employment Site in accordance with the Brent Development Management Policies document.</p> <p>The site is wholly within the Alperton Housing Zone and the north-west part of the site is also part of the Alperton Growth Area and the Alperton Masterplan SPD. To the south of the site is the boundary of the Old Oak and Park Royal Opportunity Area identified by the London Plan and its respective Planning Framework SPG.</p> <p>There are no conservation areas or listed buildings within or adjacent to the application site. The nearest listed building to the site is the Grade II listed "Brent Viaduct" over the North Circular Road. The River Brent and Grand Union Canal are each designated as Sites of Importance for Nature Conservation (SINC), and the southern and western parts of the site are classed as waterside development and so must accord with policy BGI1 Green and Blue Infrastructure in Brent.</p>
<p>Risks</p>	<p>The development will result in increased use of the road network by vehicles, cyclists and pedestrians. However, the scheme includes improvements to Beresford Avenue and the route to Stonebridge Park Station. The impact on the road network has been assessed by Brent and TfL, who consider the proposed Transport Assessment to be acceptable, subject to agreed mitigation measures.</p> <p>Delivery timescales dependent on market appetite.</p> <p>Potential need for Compulsory Purchase Order of later phases to ensure delivery of site not owned by Berkley Homes.</p>
<p>Design Principles</p>	<p>Scheme should be designed in line with principles set out in planning application 18/0321.</p>
<p>Infrastructure Requirements</p>	<p>The development includes a community facility, children's nursery and health clinic which would provide services to both the new and existing communities. In addition, significant contributions would be secured through the Community Infrastructure Levy. Improvements to Beresford Avenue and the link to Stonebridge Park station would improve pedestrian and cycle facilities and safety, including crossing facilities.</p> <p>Brent CCG requires a healthcare facility of circa 800sqm fitted out and to be delivered prior to first occupation of the first 600 units across the development. This facility should be located to the west of the site in line with its requirements.</p>
<p>Justification</p>	<p>The approved scheme seeks to provide for the redevelopment of this industrial site with a high density, residential-led mixed-use development. It will provide 2,900 homes, employment floorspace, community, retail and leisure facilities and includes both a health centre and an energy centre. To support the incoming residents and workers, and to enhance the wider community, the proposal includes improved pedestrian, cycling and vehicular connections (including improved access to public transport); publicly accessible spaces (including the provision of level access), will open up the Grand Union Canal, and River Brent to the public; and provide a range of green spaces, open spaces and formal/informal play areas.</p>

## BSWSA8 WEMBLEY HIGH ROAD

<p>Site Plan</p>			
Existing Use	A mixture of retail, residential and commercial uses		
Allocated Use	Mixed-use residential led development incorporating main town centre uses.		
Indicative Capacity	650		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	263	160	237
Address	Wembley High Road, Wembley, HA9		
Area	3ha		

Description of Existing Site	The current site forms the northern side of Wembley High Road between Wembley Triangle and the Chesterfield House development. The site extends up to the southern edge of the Chiltern Line and is located in a prime position between the emerging Wembley Park development and Wembley town centre. Buildings along the High Road range from two and three storey units with retail at ground floor level and residential above to taller commercial units opposite the former Copland School. The neighbouring Chesterfield House scheme is currently under construction and will rise to 26 storeys.
Ownership	Public and private ownership
Planning History	Planning application 18/3111 under consideration for the erection of 2 residential blocks (17 and 19 storeys) connected at ground floor level comprising 256 self-contained apartments alongside 166sqm of flexible workspace.
PTAL Rating	5-6a
Planning Considerations	<p>The site forms part of Wembley Growth Area and falls within Wembley town centre boundary, and was previously allocated for development in the Wembley Area Action Plan (WAAP). Since this designation, the westernmost plot has come forward for residential-led development known as Chesterfield House, which is currently under construction.</p> <p>The site contains a Site of Archaeological Importance, the former Wembley Hill Farm. Development should provide a detailed analysis and justification of the potential impact of the development on the heritage asset.</p> <p>The land adjacent to the Chiltern Line railway is designated as a Wildlife Corridor and a Grade I Site of Importance for Nature Conservation. The site has good habitat connectivity and provides a mature habitat within the suburban landscape. The role of the wildlife corridors should be protected from development which would compromise its biodiversity or recreational function.</p> <p>This site is in an area where the Night Time Economy is encouraged to expand. Development should take account of this and create flexible space where possible.</p> <p>Commercial development complementary to the role of the town centre should be re-provided in active frontages along the Wembley High Road.</p> <p>The potential to create a secondary pedestrian street/ continuous public realm along the rear of the High Road from Chesterfield House to Ecclestone Place.</p>
Risks	<p>Fragmented nature of land ownership could increase time taken to deliver and if not properly managed a piecemeal rather than comprehensive approach to redevelopment, resulting in a disjointed environment and inadequate infrastructure.</p> <p>Sites along the High Road not coming forward may hinder development to the rear.</p>
Design Principles	<p>A key aspect of the development of the High Road area is maintaining viability and vitality of Wembley town centre. Development should support these objectives and will need to be in keeping with providing improved public realm and pedestrian access through this area.</p> <p>Building height and massing should build upon the established rhythm along this part of Wembley High Road, corresponding to the neighbouring Chesterfield House and stepping down towards the east of the site. Density should reflect the site's high PTAL.</p> <p>The ground floor on the High Road frontage should contain active frontage of main town centre uses between Wembley Triangle and the retail units to the west.</p>
Infrastructure Requirements	Land may be required at Wembley Triangle for road widening on redevelopment of the site. The Council may seek to acquire land as part of a comprehensive redevelopment of the area for junction improvements.
Justification	The site is located in an area with excellent public transport accessibility levels and will replace the underutilised land with a well-designed, contemporary scheme, contributing towards Brent's housing need. There is an opportunity for development here to create a greater link between Wembley Central and the new development around the stadium, with an improved active frontage along the High Road.

## BSWSA9 FORMER COPLAND SCHOOL

<p>Site Plan</p>			
Existing Use	Former site of Copland School		
Allocated Use	Residential-led mixed use		
Indicative Capacity	250		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	250		
Address	Wembley High Road, Wembley, HA9 7DU		
Area	0.84ha		



Description of Existing Site	The site sits on the south side of Wembley High Road and a cleared site that was formerly Ark Elvin Academy (former Copland School). It is adjacent to the former Brent House site, which is currently under construction to provide 248 new homes with flexible commercial space at ground floor. To the south of the site sits the newly built Ark Elvin Academy, while to the east and west Wembley Park and Wembley town centres are a short walk away.
Ownership	Public, owned by Brent Council
Planning History	Previously allocated for development in the Wembley Area Action Plan
PTAL Rating	6a
Planning Considerations	<p>The site is within the defined Wembley town centre boundary, and was previously identified as an opportunity site that is suitable for redevelopment and sensitive to tall buildings within the Wembley Area Action Plan (WAAP).</p> <p>The site is the only one of sufficient size for it to be able to accommodate a sizeable food store within a town centre in this part of Brent which is required to meet capacity requirements in the area.</p> <p>The site is PTAL 6s so provides the opportunity for higher density development.</p> <p>The site contains a Site of Archaeological Importance, the former Wembley House. Development should accord with policy BHC1 Brent's Heritage Assets and provide a detailed analysis and justification of the potential impact of the development on the heritage asset.</p> <p>An active frontage must be created to the northern edge of the site along the High Road.</p> <p>A London Plane subject to Tree Preservation Order exists on the north eastern side of the site.</p> <p>The site is adjacent to a secondary school, so will need to ensure that its operation as an effective place for education is not compromised.</p> <p>The inclusion of community use floorspace that would otherwise be provided through the redevelopment of the former Wembley Youth Centre and Dennis Jackson Centre, London Road, Wembley, HA9 7EU would create a more useable community space and increase housing capacity on that site.</p>
Risks	No significant risks identified
Design Principles	<p>The site is suitable for tall buildings, but of a mid-range height that mediates between the development of the former Brent House (10 storeys) and the hotel across Cecil Avenue (7-8 storeys). Taking account of the topography and scale of development along Cecil Avenue towards the rear of the site, development should step down southwards.</p> <p>The ground floor on the High Road frontage should contain a continuous active frontage of main town centre uses to continue the road line between the former Brent House development and the retail units to the west. Development along Cecil Avenue must positively address the street and entrance to the Ark Elvin school, whilst to the east should face outwards along the school access route from the High Road.</p> <p>Safe access to the Ark Elvin Academy along Cecil Avenue.</p> <p>The TPO tree should be retained, potentially surrounded by a new piece of public realm and positively addressed by any proposed building. Sufficient space should be provided along the High Road to allow street or on site tree planting to enhance the public realm on this part of the street.</p> <p>Servicing access should be off Cecil Road.</p>
Infrastructure Requirements	No specific infrastructure requirements identified.
Justification	The site is located in an area with excellent public transport accessibility levels and will replace the former school buildings with a well-designed, contemporary scheme, contributing towards Brent's housing need. There is an opportunity for development here to create a greater link between Wembley Central and the new development around the stadium, with an improved active frontage along the High Road.

**FIGURE 32 OTHER SITE ALLOCATIONS**

REF.	ADDRESS	SIZE (HA)	EXISTING USE	ALLOCATED USE	INDICATIVE HOMES	COMMENTS
BSWSA10	Wembley Cutting North, Mostyn Road	0.2	Railway land	Residential	15	Part of Former WAAP W4
BSWSA11	Keelers Service Centre, Harrow Road, Wembley, HA0 2LL	0.07	MOT Test Centre	Residential/ commercial	24	Current Application
BSWSA12	Wembley Police & Fire Stations Harrow Road and Wembley Community Hospital/ Chaplin Road Health Centre	3.9	Police, fire and health facilities	Existing police, fire and health facilities retained/ reconfigured, opportunities for other community uses considered and residential on any surplus land	Unknown at this stage	Potential One Public Estate Site Reconfiguration. Site inefficient due to piecemeal development/ old building stock. Existing uses to be retained/ improved buildings potentially realising residential site.
BSWSA13	Sudbury Town Station car park	0.22	Car park	Residential	30	
BSWSA14	Employment Land on Heather Park Drive	0.5	Business and office space	Residential/ employment use	28	Mixed use residential with maximum replacement employment floorspace.
BSWSA15	Carphone Warehouse 416 Ealing Road	0.5	Retail warehouse	Mixed use retail/commercial/ community and residential	80	Loss of majority of retail acceptable. Some replacement to serve local area sought/ active ground floor frontages particularly along Ealing Road.
BSWSA16	Former Wembley Youth Centre/ Dennis Jackson Centre London Road HA9 7EU	0.96	Vacant Youth & Community Centre	Residential with community use	150	Re-provision of approx. 350 sq.m. of community required

**FIGURE 32 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING**

REF.	ADDRESS	SIZE (HA)	EXISTING USE	PERMISSION USES	INDICATIVE HOMES	COMMENTS
14/2276	Marvelfairs House and Carlyon Press (255 Ealing Road) HA0 1HH		NA	Residential/workspace	125	On site
17/1104	253a Ealing Road, HA0 1HH		Industrial	Residential	20	
15/3950	1C Carlyon Road, HA0 1HP		NA	Residential	28	On site
16/3606	245-249 Ealing Road, HA0 1EX		Public House/ Industrial	Residential/community/pub	92	
15/2061	2 Atlip Road, Wembley, HA0 4LU		Warehouse	Residential	99	
16/4478	All Units at Abbey Wharf and Delta Centre and All of 152, Mount Pleasant, Wembley, HA0		Industrial	Residential	135	On site
16/4156	Heron House, 109-115 Wembley Hill Road, Wembley HA9 8DA		Office	Residential	40	Prior approval
15/4473	CAR PARK, Montrose Crescent and Land N/T 499 and 509 High Road, Wembley (including existing steps connecting to High Rd, Wembley with Station Grove), HA0		Car park	Residential/retail	186	On site
15/4550	Chesterfield House, Wembley High Road		NA	Residential/ Commercial	239	On site
15/4743	Brent House		NA	Residential/ Commercial	248	On site
16/1698	Cottrell House, 53-63 Wembley Hill Road HA9			Residential/ Commercial	55	On site

# 6.1 DESIGN



## 6.1 Design

### WHERE ARE WE?

- 6.1.1** Brent has some high quality environments and buildings of high design quality which have and will endure for the longer term. This has either recognised through their statutorily listed or locally listed status, conservation area designation, or more recently architectural or design awards.
- 6.1.2** Design quality has been a significant contributor to much of the Council's estate regeneration work over the last twenty years. Whole areas have had to be demolished less than 3 decades after they were completed. In others there continue to be on-going issues of maintenance of the public realm where higher levels of crime or anti-social behaviour are prevalent.
- 6.1.3** As across much of London, things have undoubtedly improved over the last 15-20 years. In numerous areas there are undoubtedly high quality designs coming forward. This has been achieved due to a variety of factors. These include: an increased perception of the value of design particularly for consumers; improved design skills by developers and the Council; rising development values in Brent; and improved design policy/guidance at the national, London and Brent level (such as South Kilburn masterplan and the updated Brent Design Guide Supplementary Planning Document 2018) and use of independent design panels/ validation techniques to scrutinise development schemes.
- 6.1.4** Nevertheless, it is still not universally the case that the council receives high quality development applications from the outset. In addition, more recently there has been a significant increase in the number and height of tall buildings. Whatever height is set in policy, applications for much development, at least in initial discussions, seek to go above what has permission/ is already in the area.

### WHERE DO WE WANT TO BE?

- 6.1.5** The Council wants to be in a position where the provision of high quality design of the built environment and landscaping is recognised as being very good across the whole of Brent in new developments. This includes preserving and where possible enhancing heritage assets. It also has to be mindful of and sympathetic to the character of the borough. Historically this has predominantly been of a relatively low scale, low density suburban

typology. This existing character does however have to be balanced against the importance of outer London and of Brent accommodating a significant increase in its residents and workers. This is necessary to support Brent's continued prosperity and that of wider London as a leading world city. The spatial strategy seeks to concentrate new development in focused areas. This provides an opportunity to create new communities that have a different character to the typically suburban character that has historically endured. The ambition is that these will be recognised as quality places to live in the future and will knit into their surrounding context.

- 6.1.6** The London Plan has very detailed design policies that comprehensively address many of the strategic and development management policies that existed in Brent's previous Local Plan documents and those which might also have been missing. It is considered in moving forward that these policies will in the majority of cases work well for Brent in managing the design quality of developments. These policies are referenced below. As such the Council's focus will be on addressing issues which London Plan policies place requirements on us to tackle, as set out in this chapter, but also through more detailed advice in Supplementary Planning Documents (SPD). Some of these documents have already been adopted, others will be produced and more detail will also apply in some site allocations policies. These references will highlight the characteristics of existing areas that need to be respected, such as conservation area assessments, or set out the key design principles of what development should be expected to achieve, e.g. through site specific masterplans or where more detailed specific advice might be required such as in design codes. Appendix 2 sets out how the council's SPD1 principles relate to London Plan design policies.

## LONDON PLAN

Policy D1 London's Form and Characteristics

Policy D2 Delivering Good Design

Policy D3 Inclusive Design

Policy D4 Housing Quality and Standards

Policy D5 Accessible Housing

Policy D6 Optimising Density

Policy D7 Public Realm

Policy D10 Safety, security and resilience to emergency

Policy D11 Fire Safety

Policy D12 Agent of Change

Policy D13 Noise

Brent Supplementary Planning Documents

SPD1 Brent Design Guide

SPD2 Residential Extensions Guide

SPD3 Shopfront Design Guide

Conservation Area Appraisals/ Design Guides

### POLICY BD1: TALL BUILDINGS IN BRENT

**A tall building is one that is more than 6 metres above the general prevailing heights of the surrounding area or more than 30 metres in height.**

**Tall buildings will only be acceptable in locations shown on the proposals map.**

**Heights in these areas should follow the appropriate levels, except where stepping down from adjacent existing taller buildings. Tall buildings need to step down towards the edge of tall building zones.**

**In intensification corridors and town centres outside conservation areas developments of up to 15 metres above ground level could be acceptable, with opportunities to go up to a maximum of 18 metres above ground level at strategic points in town centres if of very high design quality. The design of buildings in these areas would need to fit in with local character. Elsewhere tall buildings will only be permitted in exceptional circumstances where both:**



- **of civic or cultural importance; and**
- **shown to be positive additions to the skyline that would enhance the overall character of the area.**

## ALTERNATIVE POLICY CONSIDERED

**6.1.7 No policy on the provision of tall buildings.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan.

**6.1.8 To identify that no areas are acceptable for tall buildings.** This is not appropriate as tall buildings exist in the borough or have planning permission. As such there are areas where ruling out additional tall buildings taking account of a range of factors is unlikely to be justifiable. In some cases it might be desirable to provide further tall buildings, e.g. to address incongruous impact of existing tall buildings, particularly those built in the 1960s and 1970s with their surroundings.

**6.1.9 To identify that tall buildings are likely to be acceptable throughout the borough and that no height limitations are included.** This is not appropriate as it fails to acknowledge the existing predominant low rise nature of the majority of the borough, the status of some buildings and areas as heritage assets with character that needs to be preserved or enhanced and the fact that levels of public transport accessibility are so low that they do not support higher density development. The appropriate height guidance intends to support development that reduces visual impact from a distance and does not significantly undermine existing local character.

## JUSTIFICATION

**6.1.10** London Plan Policy D8 requires the Brent Local Plan to provide a definition of a tall building and identify areas where tall buildings are acceptable. The Council has done this taking account of factors such as those identified in D8 and other London Plan policies D1 London's Form and Characteristics, D2 Delivering Good Design and D6 Optimising Density.

**6.1.11** The Local Plan policies map identifies tall building zones which will each be able to accommodate differing scales of tall buildings. It sets out appropriate heights in the zones. A residential tall building typically has a floor to floor distance of around 3 metres. So a 30 metre residential building would typically be approximately 10 storeys in height. To date completed buildings

over 60 metres (20 storeys) have been rare in Brent. Given Brent's prevailing character and its importance in London's hierarchy of places, the typical appropriate heights are up to around 45 metres (15 storeys). Where existing buildings are taller than this, new adjacent buildings of over 45 metres will be allowed. These however, must be lower than their adjacent taller building and support the progressive stepping down of buildings to the edge of the tall buildings zone. Exceptions to stepping down will be where longer term (post 2041) higher density intensification is likely to occur, for example east beyond the current Wembley Growth Area. Any reference within any place, site specific or design policy in this plan to number of storeys is for residential storeys. Proposals for commercial premises will need to be within the parameters set by the height in metres for the identified number of residential storeys.

**6.1.12** In town centres (outside conservation areas and areas of distinctive character) and intensification corridors, to support increased density to deliver Brent's housing target, tall buildings (compared to existing heights) are likely to be supported. Typically these areas have reasonably good access to public transport and a range of services/ facilities which could be better supported with increased patronage of new building occupants. The intensification corridors are main roads where public transport accessibility level is 3 or above and where the width of the street indicated by the distance between properties front to front indicate scope for increase in height. The character of these places is such that the significant height associated with tall building zones is not considered appropriate. Nevertheless taller buildings, typically of up to 15 metres (5 storeys), with the opportunity for 18 metres at strategic points (e.g. land marks/ corners/ end of vistas) could be appropriate. To reduce the impact of the height a set back of the upper storey will in some cases be required. The buildings should also reduce in scale towards adjacent properties on side streets.

**6.1.13** In addition, the opportunities for increases in height consistent with this policy are more likely to be acceptable where a more comprehensive development takes place including a whole or significant parts of a terrace, or in the case of detached and semi-detached buildings a number of adjacent properties. This will allow for instance better relationships between proportions of width to height and probably greater development capacity to be achieved. The council will provide further guidance on preferred

solutions for different blocks of properties within individual town centres and intensification corridors.

- 6.1.14** Elsewhere, whilst recognising the need in particular to promote new homes and places for work, which in some locations will allow flexibility on height compared to existing buildings (potentially up to 6 metres), tall buildings will in all but exceptional cases not be considered favourably by the Council. Exceptional cases are only likely to be those that are buildings of such civic or cultural importance. This might for example be places of worship that historically have incorporated features taller than the prevailing surrounding buildings, that they warrant landmark status. In such cases the taller element must be of such a design quality that it should enhance the character of the place in which it is set in.

NATIONAL and LONDON PLAN

Policy D1 London's Form and Characteristics

Policy D2 Delivering Good Design

Policy D6 Optimising Density

Policy D8 Tall Buildings

## POLICY BD2: BASEMENT DEVELOPMENT

### Proposals for basement development of an existing property must:

- **Demonstrate that sustainable design standards are integral to the proposal, including its construction and operation**
- **In the case of habitable development only be ancillary accommodation to a dwelling above**
- **Be no wider than the original building**
- **Extend no further than the existing front elevation, 3 metres to the rear and 1 storey down (4 metres floor to ceiling height for a detached property or 3m in other cases)**
- **Ensure any rooflights are flush with the ground and close to the main building**
- **Ensure any lightwells are modest in scale, preferably located to the rear and if located to the front are no more than whichever is the smaller of 800mm or half the length of the garden**

## ALTERNATIVE POLICIES CONSIDERED

- 6.1.15 No policy** – this is not considered appropriate as Councillors and local communities particularly in the south of the borough have identified concerns with the impacts of a growing number of basements to existing properties.
- 6.1.16 Allowing greater extent of basement extensions within the property curtilage** – this is not considered appropriate as it is likely to have unacceptable adverse impacts on the setting of the building/ townscape.

## JUSTIFICATION

- 6.1.17** London Plan Policy D9 Basements requires the council to establish a policy to address the negative impacts of large-scale basement development below existing buildings. Basement applications have increased in Brent, particularly to the south where property prices are generally higher. The extensive excavation to create basement space, plus necessary structural works for buildings above and plots adjacent can mean extended periods of works are required. Many aspects of concerns raised by residents about basements are controlled by regimes outside the planning system. Brent has produced a Basement Supplementary Planning Document to identify to applicants and those surrounding about the planning and non-planning issues that need to be addressed.

- 6.1.18** The policy focuses on controlling the size, use and the environmental impacts of basements. This is to ensure that from a planning perspective they provide an acceptable accommodation solution for their occupants and do not significantly adversely impact on the character of an area and the amenity of neighbours.

LONDON PLAN

D9 Basements

HC1 Heritage conservation and growth

Brent Local Plan

DMP1 Development Management General Principles

Basements Supplementary Planning Document



## 6.2 HOUSING



## HOUSING

### WHERE ARE WE?

- 6.2.1** Brent, as is the case for the rest of London, has a large unfulfilled need for additional homes. There is a significant difference between needs and the supply of the right type of homes at the right price. This means that there are significant affordability issues for renters and buyers. House prices rose by 46% in the last 5 years, whilst rents increased 22%, with house prices at over 15 times local incomes. Inability to afford the right home has contributed to a 24% increase in overcrowded homes to some of the highest levels in England.<sup>17</sup>
- 6.2.2** Delivery of additional homes in Brent has been good in comparison to many parts of London. This is both in overall numbers and amounts of affordable (7th highest<sup>18</sup>). Brent's annual minimum London Plan housing target has been amended from 1,065 in the period to 2014/15, to 1,525 in the period from 2015/16. The draft London Plan 2017 increases it to 2,915 from 2019/20.
- 6.2.3** 1,039 additional affordable dwellings have been delivered in the last 3 years, 4,061 market dwellings, plus 1,994 institutional dwellings<sup>19</sup> (mostly student accommodation). This is 1,940 dwellings more than its target, albeit student accommodation was a significant component of delivery.
- 6.2.4** Brent has objected to its draft London Plan housing target. It is relatively comfortable with potential delivery from larger sites that it and the GLA have identified. It does not agree with GLA assumptions on small sites delivery.
- 6.2.5** Brent's current Local Plan has a target of 50% of new homes needing to be affordable. In comparison to other London Councils Brent performance has been good, but it has not achieved 50% overall. Although house prices have risen significantly, the affordable percentage delivered has fallen. This is principally for two reasons: the effects of changes to national and London Plan policy; and funding reductions for registered providers (such as housing associations). National policy places a significant amount of emphasis on the viability of development needing to be maintained. Affordable housing requirements have to be flexible to ensure viability. The London Plan sought to maximise affordable housing provision but did not have a specific

affordable housing target. Viability is tested through an assessment process that has been subject to much criticism of its complexity and ability to be scrutinised by the public.

- 6.2.6** The Mayor and draft London Plan have sought to overcome this. This is by being specific about affordable housing targets, acceptable inputs into the viability modelling and the need for greater transparency. A longer term target is now 50%; in the interim for most sites the default position is that a minimum of 35% will be acceptable without the need for viability analysis.

### HOUSING NEEDS – MARKET AND AFFORDABLE

- 6.2.7** The Brent Strategic Housing Market Assessment 2018 identified a need for 42,000 additional homes between 2016-2041. This is equivalent to 1,680 dwellings per annum. Using a limit of 33% of gross household incomes to be spent on rent/ mortgages, affordable housing comprises 52% of that need. This does not include people who currently live in private rented housing who are receiving housing benefit to make their rents affordable; technically the market can provide for their needs. A desire to reduce benefit dependency, particularly of those who work arguably would mean real affordable needs are higher. Of the affordable need, 85% was for social rent (council house type rents) and 10% was for London Living Rent (pegged at a % of median incomes). 5% was for people able to afford between that and 80% of median local rents; typically these people might seek to buy shared ownership homes.
- 6.2.8** Government has recently redefined affordable housing needs to include people who can afford to rent, but not to buy. This was done after the council had completed its most recent assessment. As such, there is currently no detailed Brent study on this aspect of need. A rough estimate can be used by assuming that most people who rent would, if circumstances allowed, want to buy. This could comprise up to 14% or 17,400 of households (this represents the difference between owner occupation rates in 1991 (highest) and 2011). If this backlog was to be met over the period to 2041 this would mean that 93% of new homes in Brent would need to be affordable.
- 6.2.9** Government has also identified a new Local Housing Need target methodology. For Brent the initial draft methodology consulted upon in

<sup>17</sup> ORS Brent SHMA 2018

<sup>18</sup> London Plan AMR 14 2016-17 for average over 2014-15 to 2016-17

<sup>19</sup> Brent AMR 2014-15-2016-17



2017 set an annual target of 2,855 dwellings per annum, which is much higher than previous methods. National policy proposed a stepping up to achieve this target albeit in a very short period from an initial target of 2,135. This methodology has been affected by more recent changes to national household projections. This now indicates the target for Brent is likely to be 1,376 homes. Government has become aware of these significant reductions across much of the country. It has indicated it will amend either the methodology or the type of household projections used so that targets similar to those initially consulted upon will be achieved. As such the council does not anticipate either its own target, or the London target that will be translated into a Brent target through the London Plan will reduce significantly if at all.

## HOUSING NEEDS – DWELLING SIZES

- 6.2.10** The majority of size of homes required is for family dwellings of 3 bedrooms or more (53.8%), with 16.5% 1 bed and 29.8% 2 bed. Market housing requirement for family dwellings (16,900) was well above needs identified for affordable dwellings of this size (8,900).
- 6.2.11** In terms of household size composition, there will be an additional 11,800 single persons, 16,900 of two adults without children and 10,800 others (multi-generational or living in shared housing), whilst the number of couples with children is expected to drop by 100.
- 6.2.12** The draft London Plan requires the council to not be prescriptive about the size of dwellings it will require from new development. The GLA's assessment shows a London wide priority for 1 and 2 bed homes. The council has objected to this policy and assessment. The council considers it makes unrealistic assumptions about the ability of single people, particularly on benefits, being able to access 1 bed properties. Most will only be able to afford to live in Houses in Multiple Occupation which usually are larger homes. In addition it does not take account of Brent's circumstances/ local needs; for example accommodating multi-generational households related to its majority ethnic population composition. Focusing new home delivery too much on one and two bedroom homes will result in Brent residents having to move if they cannot meet their housing needs. It will also provide unbalanced developments/ new communities.

## QUALITY OF HOUSING DEVELOPMENT

**6.2.13** London Plan policies seek to lift the quality of new homes by setting size and accessibility requirements, such as 10% homes being wheelchair accessible/ easily adaptable and nearly all homes having step free access. They require high quality design, including on site amenity space. To supplement these policies there are also numerous Supplementary Planning Guidance documents.

## HOUSING NEEDS – BUILD TO RENT

**6.2.14** Over the last 5 years there has been an increase in institutions seeking to deliver large purpose built residential developments for rent. Quintain, the majority landowner of Wembley Park, is now concentrating on this tenure for 5,000 homes. Government and the Mayor are keen on this type of development; it provides potential to accelerate housing delivery as another source of capacity. The council has also been positive about it for these aspects, but also because of the quality of the homes/ services provided. The London Plan encourages boroughs to support further build for rent schemes.

## HOUSING NEEDS – HOUSES IN MULTIPLE OCCUPATION

**6.2.15** The cost, limited availability of housing and flexibility of development rights has resulted in many Brent homes becoming houses in multiple occupation (HMO); properties shared by two or more households. Whilst they do provide a valuable role in meeting housing need, their concentration can have adverse impacts on neighbours. This includes; poor maintenance of properties and waste management, overcrowding, increased anti-social behaviour, pressure on parking and other social infrastructure. Increased permitted development rights together with lack of housing licensing requirements for smaller HMOs until quite recently has resulted in the council having a limited ability to address this matter. There are now approximately 16,000 HMOs in Brent. The council has introduced licensing for all HMOs with 3 or more people forming two or more households. Government has also started consultation on more stringent licensing/ statutory requirements for HMOs. From 1<sup>st</sup> October 2018 all mandatory HMOs are required to meet minimum room sizes and the need to get waste management approved by the council. These changes point to likely greater control of quality outside of planning, helping to reduce potential for adverse impact on neighbours and tenants.

## HOUSING NEEDS – SELF AND CUSTOM BUILD

**6.2.16** Government and the Mayor are keen to diversify how and who delivers new homes. Self and custom build or alternative community type home building is supported. It is seen as a potential key component of additional delivery. The council has a statutory duty to support self and custom build. It maintains a register of those interested and should plan to meet needs. Interest in Brent appears limited in terms of registrations (76 in 2 years) and build out (33 CIL relief claims in 5 years). The council also has to maintain a brownfield register. This helps identify opportunities for self and custom build homes. The supply of self and custom build plots is typically very small scale, usually infill between existing dwellings, or in rear gardens. In other countries however, groups of self-builders come together to deliver larger schemes such as blocks of flats. To date no sites have been specifically identified in the Local Plan for self and custom build.

**6.2.17** Typically around 260 new homes per year have been delivered on small sites (defined as sites less than 2,500 sqm in the London Plan). The Mayor considers that there is large potential in increasing numbers, identifying outer London boroughs as the principal locations. The draft London Plan identifies a target of 1,023 dwellings for Brent through this source. Historic levels of delivery with policies that were generally supportive of small site delivery show this to be extremely challenging. The council has objected to this target. It considers it to be unrealistic in relation to site availability and construction industry capacity to deliver.

## HOUSING NEEDS – SPECIALIST OLDER PEOPLE'S HOUSING

**6.2.18** "There are many people living in residential institutions in Brent, e.g. nursing homes. The growth in older people in particular will mean a rise in the institutional population to around 3,300. Depending on care models, this may mean a greater need for additional capacity in such institutions, or alternatively more homes (normal and specialist) not accounted for in the 48,000 additional homes.

## HOUSING NEEDS – STUDENT ACCOMMODATION

**6.2.19** London as a whole has a deficit of purpose built student accommodation. Wembley in particular has proven attractive for investors. It has relatively swift

direct connections to central London. It also allows for a scale of building that supports the sector's preference for modular building techniques. To date over 2,400 student bed spaces have been built. Another 2,400 have consent. With the likely further education sector expansion proposed, accommodation needs are increasing. The draft London Plan supports further provision in outer London boroughs. The Local Plan limits provision to 20% of the additional population of the Wembley Growth Area.

historically might have been provided as residential institutions. Models of care have changed with social inclusion being a priority to provide better integration with existing communities. Many now prefer to occupy existing dwellings modified to meet needs. Brent currently supports this approach in planning policy. This is when accommodation is close to amenities and public transport, there is no overconcentration of such uses and suitable management can be shown.

## HOUSING NEEDS – OTHER SPECIALIST ACCOMMODATION

**6.2.20** Although the main categories of residential accommodation have been identified, there are other forms of specialist accommodation. These

## HOUSING NEEDS - GYPSIES AND TRAVELLERS AND TRAVELLING SHOWPEOPLE

**6.2.21** Brent has one dedicated Gypsy and Traveller site at Lynton Close. This



is owned by the Council. Its management was outsourced but has recently been brought back in-house. The site has been overcrowded in terms of households, residential accommodation and associated possessions. This has in part contributed to occupants' vehicles/ materials being stored in adjacent areas to the detriment of the local environment. The council is seeking to address this by clarifying who is living/ entitled to be on site and requiring rationalisation of vehicles/ materials inside and out. If necessary it will find residents alternative local accommodation, probably in conventional homes in the shorter term to address this matter.

**6.2.22** A London Plan Gypsy and Traveller needs assessment in 2008 identified the need for an additional 18 pitches between 2007-17. There have been no additional pitches provided in Brent over this period. No sites were allocated in Brent's Local Plan, although a positive criteria based policy indicated a small number of requirements for potential sites.

**6.2.23** National planning policy on meeting Gypsy and Traveller needs has undergone a series of radical changes over the last decade, the most recent being a change in definitions. To qualify, households now have to move around on a sustained basis annually. The draft London Plan definition includes more qualifying criteria. The council with other West London boroughs undertook a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment in 2018. This used both definitions. The national definition identified no additional pitch needs. Indeed Lynton Road occupiers are not defined as Gypsies or Travellers for planning purposes due to their limited travelling. Using the alternative London Plan definition a minimum of 90 additional pitches are required. Assuming traditional levels of density of accommodation this would indicate the need for nearly 3 hectares of additional sites. This would translate into the need for three or more sites, depending on their size.

**6.2.24** Brent currently does not have any sites for travelling showpeople. No additional sites were identified in the Accommodation Assessment as being required for Brent.

## WHERE DO WE WANT TO BE?

**6.2.25** The council recognises that the largest issue facing it and the borough is the lack of sufficient homes to meet needs. As such it wants to maximise the amount of homes that can be delivered, with truly affordable homes being especially important, to meet the needs principally derived from its residents. It also recognises as a constituent part of the London housing market that it has a role in meeting wider general needs, as well as some specialist needs such as students. As such in taking forward the Plan it seeks to maximise what can be provided, but as would be expected by its



community, primarily focus on Brent's needs. It will set ambitious, challenging but achievable targets, not aspirational ones as the council has very limited ability to directly impact on delivery rates as a builder of homes. To do otherwise will, as a result of current national policy, potentially result in Brent's new Local Plan policies being over-ridden by the Housing Delivery Test and presumption in favour of sustainable development. This would not serve the community well. It may mean housing development being allowed in areas, or of such a design, which the council and communities would otherwise find unacceptable, undermining other Local Plan objectives. The council will continue to ensure that the number of planning permissions for new homes significantly outweighs the annual supply. Over the last decade, on average the number of homes with planning permission at year end has been 7 times that which is built.

#### LONDON PLAN

Policy H1 Increasing housing supply

Policy H2 Small sites

Policy H3 Monitoring housing targets

Policy H4 Meanwhile use

Policy H5 Delivering affordable housing

Policy H6 Threshold approach to applications

Policy H7 Affordable housing tenure

Policy H8 Monitoring of affordable housing

Policy H9 Vacant building credit

Policy H10 Redevelopment of existing housing and estate regeneration

Policy H11 Ensuring the best use of stock

Policy H12 Housing size mix

Policy H13 Build to Rent

Policy H14 Supported and specialised accommodation

Policy H15 Specialist older persons housing

Policy H16 Gypsy and Traveller accommodation

Policy H17 Purpose-built student accommodation

Policy H18 Large-scale purpose-built shared living

## POLICY: BH1 INCREASING HOUSING SUPPLY IN BRENT

**The council will maximise the opportunities to provide additional homes in the period to 2041 and beyond. To achieve this it will grant planning permission to support the delivery of the Growth Areas, site allocations and appropriate windfall sites to provide 23,711 homes in the period 2019/20-2028/29. It will positively plan to promote a further minimum of 17,382 homes from 2029/30 to the end of the Plan period in 2041. Delivery will be assessed against Appendix 3 Housing Delivery Trajectory.**

**In doing so it will take into account the likely need to continue to plan for new homes beyond each of these periods, ensuring that master planning and planning permissions take account of and positively plan for the potential for adjacent and sites in the wider area to come forward in the future to create successful places and mixed use communities.**

## ALTERNATIVE POLICY CONSIDERED

**6.2.26 No policy.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan.

**6.2.27 To achieve a housing target as set out in the draft London Plan: Such a target is likely to be aspirational, rather than grounded in reality.** The council does not consider that the GLA identified Strategic Housing Land Availability Assessment capacity on delivery from small sites, a significant component of the target, in particular is realistic. Setting this target in the Local Plan knowing it cannot be achieved and could ultimately undermine the Brent Local Plan as a whole with the associated impact on the credibility of the development plan adoption process with the local community is not considered a viable option.

**6.2.28 To only identify a housing figure to 2029.** This is possible but for the sake of good planning for the future is considered appropriate. Housing needs although potentially not as high as in the period to 2029 are still likely to continue to be significant in the future. In addition larger sites can take a long time to come forward, so the sooner they are identified or the potential for them to be identified the better the prospect of their earlier delivery. In addition longer term thinking allows better solutions to be considered in terms of place-making and creating a critical mass for new infrastructure, etc., rather than a piecemeal approach which might otherwise materialise.

## JUSTIFICATION

- 6.2.29** The London Plan housing target is related to the needs of the borough, but also wider London. It reflects the identified capacity for homes on sites that the GLA considers will become available. The Plan has sought to provide as much certainty as it can from a planning policy perspective on how it will try to meet the overall target to 2029. It has also sought to look to the period to 2041 and potentially beyond on some sites. This will produce better planning outcomes, bringing greater certainty to where future homes and jobs are likely to be located and encourage their timely delivery as many of the larger sites can take a significant amount of time from their identification to implementation.
- 6.2.30** Wherever it can the Local Plan seeks to identify specific sites on which new homes will be delivered. The spatial strategy focuses the majority of development in Growth Areas. Five of these have been taken forward from the previous Local Plan with additional capacity identified within their existing boundaries and in some cases through their extension. In addition two new Growth Areas, taking advantage of better connectivity provided by new rail stations, have been identified.
- 6.2.31** Within the Place chapters site specific allocations with more detailed policies are shown. The Plan also allocates sites with an indicative housing target but no site specific policy which will be developed in accordance within the development plan. In addition an assessment has been made of the likely delivery from ‘windfall’ small sites, which is sites of less than 25 dwellings/ 0.25 hectare. There are also sites with extant planning permissions, some of which might have started which will contribute to the target.
- 6.2.32** All these sources are listed in Appendix X. History tells us that there are likely to be large sites not yet identified in the Plan that will be subject to planning applications for housing development. No explicit assumption of the likely number of homes that they will deliver has been included in this Plan. Nevertheless, where they accord with policies in the development plan they will be given planning permission and contribute towards the target.
- 6.2.33** National policy requires that both the potential to achieve the Local Plan housing target and its actual delivery is undertaken on an annual basis. The council has to demonstrate in the future a five-year supply of deliverable housing sites. In looking back the Housing Delivery Test assesses the previous

3 years’ delivery. Should there be failure against either of these assessments, then there are potentially significant consequences. One is the possibility for local policy to be over-ridden by national policy when determining planning applications. This could lead to outcomes which neither the council nor Brent residents/ businesses support. As such the council will endeavour to undertake the necessary actions to ensure that it can achieve the required number of homes, including supporting delivery of homes on its own land portfolio such as estates.

### LONDON PLAN

Policy H1 Increasing housing supply

Policy H2 Small sites

Policy H3 Monitoring housing targets

### POLICY: BH2 PRIORITY AREAS FOR ADDITIONAL HOUSING PROVISION WITHIN BRENT

**In addition to the Growth Areas and Site Allocations identified in this Plan, town centres, edge of town centre sites and intensification corridors will be priority locations where the provision of additional homes will be supported.**

**Within town centres, edge of town centre sites and intensification corridors where existing non-residential floorspace forms part of a site proposed for residential development, the council will require re-provision of the same amount and use class of non-residential floorspace. Exceptions to this will be where it can be shown that:**

- a) there is no need for it or reasonable prospect of its use if provided; or**
- b) in exceptional cases that its loss is outweighed by the benefits that its replacement with residential floorspace will bring.**

### ALTERNATIVE POLICY CONSIDERED

**6.2.34 No policy.** This is not appropriate. The council wants to provide for and meet its housing delivery requirements and as such identifying sites where new homes are considered appropriate is necessary.

**6.2.35 To extend the scope of the policy so that it potentially captures more sites.** Realistically this would mean promoting more development in areas with lower PTAL scores, which will increase car dependent development.



Alternatively it would result in areas/ sites being identified which are not in residential use, which might undermine the provision of non-residential uses that are required to serve the needs of the population.

- 6.2.36 To further reduce the scope of the policy by not requiring re-provision of non-residential floorspace in any circumstance.** This is not considered appropriate. Whilst provision of additional homes is a priority, this should not always be at the expense of other uses which can meet objectively assessed needs, add vitality and viability to places and can provide employment or services to residents/ businesses/ groups.

## JUSTIFICATION

- 6.2.37** In addition to the Growth Areas and Site Allocations the Plan, consistent with national and London Plan policy, identifies town centres and areas with higher levels of public transport accessibility as priority areas for the provision of the additional homes required. As well as meeting housing needs, it is recognised that additional homes and their residents can bring other benefits to areas, such as their regeneration, or in the case of town centres, bring additional activity to an area. Nevertheless non-residential uses can also play an important role in an area. They can add to the vitality and viability of these places and in meeting employment and other needs of the population, businesses and other groups. Residential development tends to be a higher monetary value use that can displace other not so financially valuable uses.
- 6.2.38** Whilst it is a priority to meet housing needs, the provision of residential should not necessarily be at the expense of these other uses. This is particularly so where there is an identified need, or reasonable prospect that non-residential floorspace will be used for its intended purpose. Many uses within these areas may be protected or their re-provision required by other policies in the Plan, e.g. ground floor uses in primary shopping frontages, employment or community uses, but some will not be. As such this policy seeks to protect existing uses where appropriate.
- 6.2.39** Nevertheless, there is a balance that needs to be struck. Whilst the council wishes to promote mixed use environments, there have been cases where it has previously sought ground floor commercial uses along main streets which subsequently have remained vacant for some time. This has resulted in some cases in a declining townscape quality and image for an area. As such the council will not require re-provision where there is no reasonable prospect



of non-residential premises being used for their intended purpose. In the case of this policy, where a developer does not propose the re-provision of non-residential uses and where not protected/ required as a result of other policies in the Plan, it will apply similar tests on need/ vacancy required for local employment sites.

- 6.2.40** In very exceptional circumstances the council might accept wholly residential schemes without the development meeting tests related to need/ likely occupation. This might be for instance where an existing use is a 'bad neighbour'/ 'non-conforming' use which is undermining the amenity of an area. In these types of cases the applicant would have to show that the problems could not be addressed through its redesign or suitable conditions attached to a planning permission to overcome those adverse effects.

#### LONDON PLAN

Policy SD6 Town Centres

Policy SD7 Town Centre Network

Policy SD8 Town Centres: Development Principles and Development Plan Documents

#### BRENT LOCAL PLAN

Policy BE3 Local Employment Sites and Work-Live

Policy BE4 Supporting Strong Town Centres

Policy BSI1 Social Infrastructure and Community Facilities

Policy BD2 Tall Buildings In Brent

#### POLICY: BH3 BUILD TO RENT

**To encourage increased housing delivery, within Growth Areas or on development sites of 500 dwellings or more, the provision of Build to Rent properties will be expected unless this would:**

- **be shown to undermine the overall site's timely development; or**
- **would undermine viability to such an extent that it significantly undermines affordable housing delivery.**

#### ALTERNATIVE POLICY CONSIDERED

- 6.2.41 No policy.** This would not be consistent with the desire of Government

and the GLA to support the identification of additional sites to assist in the delivery of build to rent properties.

- 6.2.42 To extend the scope of the policy so that it captures more sites, or a minimum amount of the development that should be Build to Rent.**

Build to Rent schemes tend to require a minimum amount of dwellings to be attractive to institutional investors. Typically this to date has been over 200 dwellings. This represents a sizeable element of the majority of development sites in Brent, as such the threshold of 500 dwellings seems appropriate to provide the flexibility for build to rent to not necessarily be the dominant element of a site. Identifying a minimum amount is also not appropriate as it could either potentially reduce the likelihood of the site coming forward at all, or potentially undermine delivery of build to rent schemes which in all other respects would be permitted.

- 6.2.43 To further reduce the scope of the policy.** This is unlikely to result in any build to rent being provided other than what would occur through market forces in any case.

#### JUSTIFICATION

- 6.2.44** Build to rent provides a valuable addition in terms of increasing the capacity of the development sector to deliver new homes. The council is keen to encourage its provision as it is widens the type of homes available in Brent, assists in producing additional homes to meet overall targets and is likely to drive up standards for tenants in new and existing market rented homes. To date the finances and models of delivery of build to rent appear to limit the extent to which these operators can compete with residential for sale. The policy seeks to ensure that some sites are made available to build to rent developers. It is recognised however that as the product and market is relatively new.

- 6.2.45** To limit risks of unintended consequences of this policy expectation, where there are genuine reasons why on-site provision might cause unintended consequences some flexibility is allowed where the consequences are likely to be severe for housing delivery overall or affordable housing provision. At the other extreme, the Council does not wish to see all large scale development sites coming forward as build to rent. It wants to encourage additional home ownership opportunities within the borough for those that can afford it.

#### LONDON PLAN

Policy H12 Build to Rent

## POLICY: BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT

**Planning Permission for Small Sites will be determined in accordance with London Plan Policy H2 with the exception of:**

**Criterion D 2, which in Brent will only apply within PTAL 3-6 locations**

### ALTERNATIVE POLICY CONSIDERED

**6.2.46 No policy.** This is not appropriate. Brent does not consider that the generic approach identified in the London Plan is sensible planning. It does not deliver the numbers of dwellings that the London Plan identifies.

**6.2.47 To extend the scope of the small sites policy so that it potentially captures more sites.** Realistically this would either mean promoting more development in areas with lower PTAL scores, which will increase car dependent development, or further increasing the allowable capacity on sites which the London Plan considers appropriate, which could undermine character. To compensate for this potential loss of capacity, policy D2 Tall Buildings in Brent identifies intensification corridors which allow for taller buildings that would currently be allowed taking account of existing surrounding building heights.

**6.2.48 To further reduce the scope of the small sites policy.** This is unlikely to be considered to be in conformity with the London Plan by the GLA as it would be likely to be viewed as unacceptably reducing the potential for development.

### JUSTIFICATION

**6.2.49** The London Plan sets ambitious targets for small site development across London on the basis of the content of Policy H2 Small Sites. The council is positive about the extent to which small sites can contribute towards meeting housing needs. Historically small sites have consistently provided about 250 dwellings per annum, or between 15-25% of homes built. In relation to Policy H2 the council has in the Local Plan identified town centre boundaries and main movement/ public transport corridors as principal areas where it considers the most obvious potential exists.

**6.2.50** As an outer London borough Brent has comparatively high car dependency rates for journeys, particularly in the area 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 those stations. The 800m 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.

**6.2.51** As such the council considers that the existing London Plan Policy H2 is a blunt tool that needs some refinement to take account of Brent circumstances. In areas with 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 D 2 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.

**6.2.52** In addition Brent adds another criterion to policy H2 to ensure that wider allocations are not undermined by the presumption in favour of small site development where this would have the potential to undermine a larger allocation, e.g. within a town centre by introducing a greater number of owners/ potentially pushing up the values of existing properties.

### LONDON PLAN

Policy H2 Small sites



## POLICY: BH5 AFFORDABLE HOUSING

In Brent the affordable housing tenure split required to comply with the Fast Track approach for viability for developments of non-Build to Rent developments of 10 dwellings or more is a minimum of:

- a) 40 per cent Social Rent/London Affordable Rent/Rents Within Housing Benefit Caps
- b) 30 per cent Social Rent/London Affordable Rent equivalents; and
- c) 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership. These must be for households within the most up to date income caps identified in the London Housing Strategy or London Plan Annual Monitoring Report.

## ALTERNATIVE POLICY CONSIDERED

**6.2.53 No policy.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan.

**6.2.54 To seek an affordable housing target higher than 35%.** Whilst the Council has historically sought 50% on development sites, its delivery on private developer sites has not been consistently achieved since the adoption of the Core Strategy. The London Plan's 50% fast track approach applies to sites which in Brent have delivered or been near to delivering 50%, that is public land and former industrial sites. As such whilst the council still supports a target of 50%, in the context of the more limited funds available to the public sector to subsidise social/ low cost rents in particular, it does not consider an increase to 50% target in policy as justifiable.

**6.2.55 To put a greater emphasis on intermediate products.** The current split seeks to meet priority affordable needs as identified in the Brent SHMA, but also allow for mixed communities by encouraging the provision of some intermediate products. The SHMA shows that intermediate products are essentially unaffordable to 95% of those in affordable housing need. Intermediate products are more likely to be occupied by people who have a choice within the market for alternative accommodation, e.g. market rent. Given the number of people who are homeless/ in temporary accommodation, an increase in intermediate proportions is not considered appropriate.

## JUSTIFICATION

- 6.2.56** The number of homes needed to meet Brent’s affordable housing needs are significant. The needs outweigh the number of affordable homes within the necessary tenures that can realistically be delivered over the lifetime of the Plan. This is the case when taking into account both the planning enabling and affordable housing provider funding mechanisms available. National policy requires the council to set affordable housing targets that are realistic. Particular regard has to be made to development viability. Government does not expect that each major housing application should routinely be subject to viability assessment.
- 6.2.57** Draft London Plan Policy H6 sets a threshold approach to affordable housing provision to remove the need for viability assessment. It sets out the Mayor’s minimum requirements in terms of tenure for 60% of the affordable housing sought. It then requires borough local plans to provide further detail on what the remaining 40% should comprise. Brent’s needs are predominantly for social rent/ London Affordable Rent levels. These are more difficult to deliver as they require the highest amounts of subsidy, either from the public purse or via cross subsidy from market homes for sale/ rent.
- 6.2.58** The council is very supportive of the Mayor’s long term 50% affordable housing target and in the interim the 35% that would be delivered by a London Plan policy compliant threshold application. The council recognises that its historic target set out in the previous Local Plan of 50% of all new homes being affordable was extremely challenging to achieve. The most recent Local Plan viability assessment indicates that this will not be achievable on most privately developed sites. It is still very challenging on publically owned sites, particularly against a backdrop of significant reductions in housing subsidy from central government as a result of austerity measures since the target was initially set. Government has more recently given some additional funding to support public sector/ subsidised housing provision. It has indicated potentially greater flexibilities on council funds to support affordable housing and additional financial support to Registered Providers. Nevertheless, against the backdrop of the significant step change in housing delivery required, these measures to date are still well short of increasing affordable supply to levels required and last seen in the 1970s.
- 6.2.59** In relation to its local element of the London Plan tenure split over which it has discretion, the council will seek to maximise the amount of social rent/ London Affordable Rent that can be delivered on site. This is set out in criterion a), whilst b) and c) relate to the London Plan requirements.
- 6.2.60** It is recognised that some sites will have viability issues related to abnormal circumstances, such as the need for decontamination, or significant pieces of infrastructure to open up the site to development. Consistent with London Plan policy, any deviation from the minimum 35% not consistent with the required tenure mix will need to be fully justified through a policy compliant viability assessment. In these situations, where the case is proven, flexibility will be shown on the part of the council to allow a move away from the preferred tenure of social rent/ London Affordable Rent. This will however be to homes that will still be affordable to those that are able to receive housing benefits.
- 6.2.61** Where viability impacts are so great that a reduction in percentage of affordable housing that can be achieved on site is below 35%, the council will seek to pursue the preferred tenure split set out in policy. It views the delivery of more affordable tenures that would meet needs as a greater priority than achieving a potentially higher percentage of affordable housing on site that is not consistent with meeting these priority needs. Some developers nevertheless seek to increase the overall headline affordable homes percentage delivered on their site through the provision of more intermediate tenure dwellings. In these cases, the council will seek at no extra cost to the developer, a scheme which greater prioritises genuinely affordable rents, even if this results in the overall headline percentage of affordable justifiably reducing.
- 6.2.62** In relation to intermediate housing tenures, the council would welcome affordable solutions, such as community land trusts, which offer a genuine alternative community focused/ led way of delivering new affordable homes. Where these types of solutions however potentially undermine the delivery of its preferred tenure mix, it should not automatically be assumed that this will be acceptable. Promoters of such schemes should seek to engage early on with the council, prior to committing any significant resource.

## APPLICATION INFORMATION

- 6.2.63** Design and access statement to clarify how the preferred size and tenure mix was taken into account in the initial design of the scheme and subsequent amendments.
- 6.2.64** An affordable housing schedule that provides information and justification

on the tenure mix and size of dwellings included within the development. Ideally this should identify the Registered Provider who will own/ manage the affordable dwellings.

- 6.2.65** An affordable housing viability assessment if the application is not meeting the minimum 'fast track' approach. Details of what this must include are set out in the London Plan and Housing SPG and the council's Local Validation List.

#### LONDON PLAN

Policy H7 Affordable housing tenure

Policy H13 Build to Rent

### POLICY: BH6 HOUSING SIZE MIX

**The council will seek to deliver a target of 25% of new homes as family sized (3 bedrooms or more) dwellings. For every four dwellings included within developments at least one must be 3 bedrooms or more. Exceptions to the provision of family sized dwellings will only be allowed where the applicant can show that:**

- a) **the location or characteristics of the development are such that it would not provide a high quality environment for families, or**
- b) **its inclusion would fundamentally undermine the development's delivery of other Local Plan policies.**

### ALTERNATIVE POLICY CONSIDERED

- 6.2.66 No policy.** This is not appropriate as it would likely result in not enough new family sized homes being built in Brent, thus meaning greater overcrowding and also out migration of the existing population in order to meet their housing needs.

- 6.2.67 To provide an overview of accommodation needs, but no minimum target.** This would not provide clarity to developers about the size of accommodation that the council would usually regard as acceptable. It would not be clear what purpose it would serve as attempts by the council to ensure compliance with size splits would be regarded as being inconsistent with the London Plan policy which requires councils to not be prescriptive about size mix.

- 6.2.68 To provide a higher target: This is not considered desirable as current levels of delivery,** potential impacts on scheme viability, plus potential conflict with the London Plan mean a larger target is unlikely to be realistically achievable.

### JUSTIFICATION

- 6.2.69** In terms of dwelling sizes Brent's predominant needs (65%) are more larger sized (3 bed or more) family dwellings. Brent has significant levels of overcrowding (some of the highest in the country) and its ethnic mix means that multi-generational households are very prevalent. Despite the large need the policy requirement for family dwellings is set at 25%. The policy approach is considered to reflect a fair balance between meeting needs and ensuring mixed communities in new developments, providing enough flexibility on the remaining dwellings for developers to make schemes viable, whilst facing the market realities of incorporating this size of home in the types of developments that are predominantly going to be built in the borough.

- 6.2.70** The council understands that for some developments there might be legitimate reasons why the developer considers the provision of family housing is incompatible with the development proposed, e.g. specialist older people's housing, specific site characteristics, or viability impacts having a significant impact on the ability to achieve affordable housing targets. In these circumstances it will, where the reasons put forward by the applicant are suitably compelling, allow an exception to the 25% provision to occur.

#### LONDON PLAN

Policy H12 Housing size mix

The following policy proposes to take forward a slightly amended existing policy in the Brent Local Plan. Underlines shows new text, ~~strikethrough~~ shows removed text.



## POLICY BH 7 DMP-20: ACCOMMODATION WITH SHARED FACILITIES OR ADDITIONAL SUPPORT

Proposals for student accommodation, non-self-contained or self-contained residential accommodation with shared facilities or on-site support/care to assist residents in their daily lives will be supported where the development is:

- a) is located in an area with good access to public transport and other amenities, including shops (normally within 400m);
- b) is of an acceptable quality meeting appropriate standards for the needs of its occupants, including external amenity space, appropriate communal facilities, levels of support/ care and mobility;
- c) includes management arrangements suitable to its proposed use and size;
- d) demonstrates that there is a specific Brent, or in the case of education a London, need for the particular use which are secured by planning agreement relating to use of the land or to its occupation by members of specified educational institutions;
- e) will not lead to an over-concentration of the type of accommodation in the area which for the following is defined as:
  - i. Student Accommodation – no more than 20% of the proposed population of Growth Areas being students;
  - i. Houses in Multiple Occupation – no more than 4 of 11 adjacent properties

The loss of existing accommodation or a site where it has been granted planning permission for such use will only be acceptable where:

- f) demonstrated of that there is no Brent need for the accommodation type, or residents' needs can be better met by other existing accommodation and the site owner after undertaking reasonable endeavours in working with the council is not successful in finding an alternative supported accommodation scheme for the site ; or
- g) unsatisfactory existing accommodation cannot be improved to achieve current standards

## ALTERNATIVE POLICY CONSIDERED

**6.2.71 No policy.** This is not appropriate as without it accommodation may be placed in inappropriate locations and potentially have an adverse impact on neighbourhoods through an over-concentration of shared accommodation.



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**6.2.72 To not include criteria that seek to stop an over-concentration of accommodation in a place.** This is not appropriate as it would potentially have an adverse impact on neighbourhoods. The council receives numerous planning and environmental health complaints about perceived over-concentration currently from adjoining residents.

**6.2.73 To not require consideration of other potential non-self-contained accommodation for which there is a need when an existing use is no longer required on site.** This is not appropriate as it is likely to lead to loss of opportunity to provide for specialist needs. These developments find it very hard to compete with the values that housing developments can achieve in securing sites. As such they are unlikely to be able to find sufficient sites to meet local needs.

## JUSTIFICATION

**6.2.74** The majority of housing needs will be met through self-contained residential accommodation. However, some will be met through non self-contained accommodation with shared facilities (such as houses in multiple occupation or purpose built student accommodation). It might also be more institutional in its form as self-contained or non-self-contained accommodation that shares facilities or requires additional on-site support for residents (such as hostels, or extra care facilities). The policy seeks to provide greater clarity on how the council will support development proposals for these uses through the planning process.

**6.2.75** For the purposes of this policy shared housing includes houses in multiple occupation (HMOs), bed-sits, hostels, housing for older people, supported housing for those with special needs and specialist student accommodation. It also includes accommodation providing any level of care, whether non self-contained or self-contained units with a small amount of communal facilities. The policy seeks to protect the amenity of existing areas and create a good standard of accommodation in locations that are likely to be more suited to meeting occupiers' needs. It also protects existing sites where there is currently such provision.

**6.2.76** Changes in demographics, welfare and lifestyle choices mean that there will be increased demand for these types of accommodation. These types of uses make a significant contribution to meeting local and in the case of students, London needs. They can also assist in developments through increasing viability and vitality and more balanced communities.

**6.2.77** The developments are likely to be aimed at people with limited accessibility to personal transport. Consequently there is a need for them to be located close to public transport and other amenities.

**6.2.78** The developments could potentially be for people with specialised needs but with lower levels of income. This however should not diminish the quality of the accommodation provided. Where self-contained rooms are proposed they will be assessed against London Housing SPG standards. External amenity space will be required as will appropriate communal facilities to support residents (e.g. meeting rooms to stop residents congregating outside, in the vicinity of the development). Where levels of care or support are high provision of staff residential accommodation may be required. Conditions or legal agreements may be used to require that uses have appropriate and permanent management arrangements.

**6.2.79** To ensure that residential accommodation meets needs over time, London Plan policy requires 10% wheelchair accessible/ easily adaptable dwellings. The accommodation covered by this policy is likely to be meeting needs of specific sectors of the population. On this basis the council will be willing to depart from the minimum 10% wheelchair where evidence is compelling to indicate why it might not be appropriate e.g. where occupants are less likely to suffer from mobility disabilities compared to the general population. In other forms of accommodation there could be a need for a higher proportion, e.g. disability orientated housing.

**6.2.80** Affordable housing requirements will be applicable to qualifying proposals for accommodation classified as C3 under this policy.

**6.2.81** There are also scenarios where these forms of accommodation can particularly impact on residential amenity, character and housing mix of an area. Residential amenity means both that of the potential occupiers and those adjoining the development. Adverse impacts are more likely where there are concentrations of one or more of these types of accommodation in an area. Common issues can include: noise and disturbance associated with intensification of the residential use and/or occupant lifestyles; on-street parking pressure; transient populations replacing settled family occupants; social cohesion impacts; changes in supporting community infrastructure such as shops; external alterations undermining clear local character; and poor waste management.

- 6.2.82** Harmful concentrations are likely to arise when the types of issues identified cumulatively result in detrimental effects on the qualities and characteristics of a place or where housing choice is reduced to not provide for differing community needs. For example a concentration of accommodation for older or vulnerable people may have implications for local services such as GPs. Where the existence of similar uses in an area means this is identified as a concern, it should be demonstrated that local services have capacity or planned capacity to meet the needs of future occupants. Where this is not the case, and no other mitigation is agreed, the proposal may be unacceptable.
- 6.2.83** All of the forms of accommodation addressed by the policy will require information on their intended management to meet residents' needs to reduce the potential for adverse impact on amenity of those surrounding.
- 6.2.84** Brent is an area with lower property values than some parts of London, particularly inner London. Pressure created by welfare reform and support agency budgets to reduce costs might provide drivers for relocation to Brent. For the reasons identified in relation to potential adverse factors identified above in relation to concentration, Brent is reluctant to encourage such a move. Consequently it will seek to ensure that with the exception of students, the accommodation proposed is addressing a Brent population specific need. Where appropriate it will seek to ensure that at least initially and in some cases for subsequent occupiers that priority for such housing is made available to people in Brent.
- 6.2.85** Consistent with London Plan principles of creating long term sustainable buildings, emphasis should be placed on construction methods to assist future conversion to self-contained residential accommodation. This may include allowing future rearrangement of internal walls, or a design based on permanent residential layout standards.

## HOUSES IN MULTIPLE OCCUPATION (HMOS)

- 6.2.86** HMOs must meet the standards of Brent's HMO licensing scheme, including minimum room sizes. These sizes have been developed in accordance with the Housing Act 2004. To reduce the potential for over-concentration the policy adopts a simple approach of seeking to allow no more than 4 of any 11 adjacent properties being HMOs. This will be taken as 5 dwellings on each side on the proposal on the same side of the street, or as far up to 5 as possible with the remainder of the 10 on the property's other side.

The landlords will be expected to register properties in conformity with the council's licensing scheme.

## HOSTELS

- 6.2.87** Hostels must be designed with a layout to satisfactorily meet the needs of their intended occupants, with suitable communal spaces and rooms to meet any other associated needs.

## SPECIALIST STUDENT ACCOMMODATION

- 6.2.88** The London Plan anticipates that the numbers of students in London will continue to grow and requires boroughs to ensure that both demonstrable local and strategic student housing needs are addressed. There has been a substantial increase in the amount of large scale purpose built specialist student accommodation from national providers in Brent recently, particularly in the Wembley area. This has been provided as either self-contained accommodation or rooms with shared facilities. It is good quality and has high levels of on site management. Continued additional provision particularly as part of a balanced mix of housing types within regeneration is supported. To reduce the potential for over-concentration, a target of students representing no greater than 20% of the anticipated population of a Growth Area will be adhered to.

## LOSSES OF ACCOMMODATION

- 6.2.89** Other than in exceptional circumstances proposals should not result in the loss of permanent self-contained accommodation. Accommodation which provides care will be protected unless it is no longer needed in the borough or it is unsatisfactory and cannot be brought up to current standards. Given the likely need for additional supported housing within the borough, the council is keen to ensure that the opportunity to reuse sites or those with planning permission for supported accommodation is considered. This could be in its existing or reconfigured/ redeveloped form site. As such the owner will be expected to work with the council and use reasonable endeavours to test these opportunities with potential end users prior to the potential for other non-supported uses being considered/ taken forward

## APPLICATION INFORMATION

- 6.2.90** Within the Planning Statement how the application addresses evidenced local

needs or in the case of student accommodation London's needs is required.

- 6.2.91** To assess impacts on local amenity, the identification of other non HMO uses covered by this policy within a 50 metre radius of the property. For uses that accommodate more than 10 occupants the detail of impact on social infrastructure (such as GPs) and whether this can be accommodated or if sufficient capacity is not available currently how this will be addressed.
- 6.2.92** Details and mechanisms of how the council can be assured that the accommodation will be:
- 6.2.93** used by the people in the need identified to support the application, and
- 6.2.94** managed long term to minimise the potential for adverse impacts on the surrounding area
- 6.2.95** For example through suggested conditions related to restricting type of occupants and an agreed management plan. Where loss is proposed, the justification as to why either the need for the accommodation is no longer required, or the accommodation is no longer fit for purpose and could not reasonably be made to be.

#### LONDON PLAN

Policy H14 Supported and specialised accommodation

Policy H17 Purpose-built student accommodation

Policy H18 Large-scale purpose-built shared living

#### POLICY: BH8 SPECIALIST OLDER PERSONS HOUSING

**To support achieving the London Plan annual benchmark monitoring provision target of 230 dwellings per annum the council will require provision of specialist older people's accommodation in the following circumstances:**

- a) **Within all Growth Areas except South Kilburn developers will be expected to work together to identify sites on which as a minimum 10% of all the Growth Area's additional dwellings over those which already have planning permission will be delivered;**
- b) **Elsewhere, sites with a capacity of 500 or more dwellings.**

#### ALTERNATIVE POLICY CONSIDERED

- 6.2.96 No policy.** This is not appropriate as it provides no certainty that at least some of the specialist older people's target will be achieved.



**6.2.97 To require higher or lower provision from sites in Growth Areas.** The preferred option balances up the need to provide additional specialist older people's homes against the other objectives for Growth Areas. The need for these types of homes represents approximately 10% of the total housing target to 2029 and through the SHMA the same for the period to 2041. As the Growth Areas will provide the majority of homes, the 10% target is considered appropriate.

**6.2.98 To identify a smaller threshold than 500 dwellings or set a target for these sites.** There are a wide range of older people's housing products required, some of which have to be of a significant size to work, e.g. extra care, or could be smaller scale, e.g. dementia. A site that can accommodate up to 500 dwellings potentially provides the capacity to be able to accommodate a wider range of options for older people's housing. Outside of Growth Areas much larger sites are going to be limited, if they do come forward at all. Reflecting the diversity of accommodation, a site specific target is not considered appropriate. A clear justification for the proportion attained on site is likely to provide a better solution than sticking to a specific percentage which might not be compatible with viable delivery models for this type of accommodation.

## JUSTIFICATION

**6.2.99** The SHMA identified a need for more specialist accommodation to meet the needs of the growing numbers of older people. The London Plan sets an annual specialist housing for older people target for Brent of 230 dwellings. The Brent SHMA provides further detail and identifies that this will be across a range of products, including the traditional sheltered to more schemes with increasing levels of support, such as extra care or specialist such as dementia.

**6.2.100** Specialist older people's housing is provided by both the market, registered providers such as the council and Housing Associations and charities. More often than not however most models cannot compete directly with private sector led build for sale homes in the land market. As such the council is seeking to ensure that the potential for them to gain access to sites is made available through this policy. A specific percentage for individual sites is not considered appropriate in policy as the models of delivery of specialist accommodation will vary related to delivery models reflective of needs. As such the Council will seek evidence from the developer that they have made best endeavours from the outset to consider and accommodate a range of types of specialist older people's housing in Growth areas and on large housing capacity sites.

## LONDON PLAN

Policy H15 Specialist older persons housing

### POLICY BH9: GYPSY AND TRAVELLER ACCOMMODATION

**The existing Lynton Close travellers' site will be retained unless evidence shows it is no longer needed.**

**The council will seek to accommodate the identified needs for any additional pitches in its latest study that is consistent with the most up to date national or adopted London Plan definition of Gypsy and Travellers and associated needs assessment methodology.**

**Within Growth Areas and developments of 1 hectare or more that will include new homes, the potential for the incorporation of a dedicated Gypsy and Travellers' site/s should be robustly considered as part of any required masterplanning/site design evolution process. If it is evidenced that a more traditional format of site cannot be incorporated, then more innovative ways of accommodating needs should also be shown to have been considered.**

**Proposals for Gypsy and Travellers' sites should:**

- a) **Meet a Brent derived need for such accommodation;**
- b) **Be located on a site and in an area both environmentally acceptable for residential occupation and suitable for the undertaking where required of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;**
- c) **Have acceptable accessibility by road users and pedestrians and to local services and public transport**
- d) **Be laid out and incorporate boundary treatments that seek to positively integrate with the adjacent townscape/ communities.**

### ALTERNATIVE POLICY CONSIDERED

**6.2.101 No policy.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan and national Planning Policy for Traveller Sites.

**6.2.102 To identify a target but not prioritise any particular site through use of a criteria based policy only.** This is not considered appropriate as it is unlikely to result in needs being met.

## JUSTIFICATION

- 6.2.103** Brent currently has 30 formal pitches of accommodation located on the Lynton Road site of approximately 1 hectare which historically has had problems of over-crowding. A West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment was undertaken in 2018. Using the draft London Plan definition of a Gypsy or Traveller, a minimum of an additional 90 pitches would be required. This is very different to the results in the same assessment generated for the national definition. This indicated a need for no additional pitches. Existing residents of Lynton Road although living in caravans did not fall within the current national definition of Gypsies and Travellers for planning purposes. Clarity will be provided on adoption of the London Plan which is the most appropriate.
- 6.2.104** Assuming traditional accommodation density levels the 90 additional pitches would indicate the need for nearly three hectares of land. For management purposes, this could be three or more sites, depending on their size. Realistically the only land that could accommodate this size of need will be that currently in non-residential use which through redevelopment could provide an acceptable residential environment.
- 6.2.105** Due to the need to accommodate an increased population with associated social infrastructure, many Local Plan policies require replacement of existing

residential and non-residential uses. This and the value of land realistically plays a significant role in limiting opportunities for delivery of single use travellers' sites. The 2018 assessment identifies that those in need are unlikely to be in a position to purchase/ develop a site. As such the best opportunities for delivering additional provision are likely to be in areas that will be subject to wholesale regeneration for a range of uses where residential is also appropriate. This includes Growth Areas, or larger development site allocations/ windfall sites that come forward for development incorporating new homes.

- 6.2.106** In order to give a greater likelihood to delivery of Gypsy/ Traveller pitches sites, the council will require robust consideration of their incorporation as part of any large development where a development proposes new homes. This includes in the masterplanning of growth areas, or large scale sites of 1 hectare or more.
- 6.2.107** The scarcity of development land in Brent means that it has to be used efficiently. This is likely to mean that the low density/ intensity models previously used for Gypsy/ Travellers' will be extremely challenging if not impossible to deliver. As with other uses such as schools, health centres or supermarkets, suitable sites may well only come about as part of wider,



potentially vertically mixed used developments. Therefore consideration needs to be given to innovative ways of accommodating Gypsy/ Traveller sites within these types of developments.

- 6.2.108** Gypsy and Traveller sites will need to provide a safe and acceptable potential living environment; essentially consistent with the characteristics expected of mainstream housing. This includes having good access to social infrastructure to help address recognised disadvantages in relation to educational attainment and health/ life expectancy that this group has. Nevertheless, there should also be consideration of particular needs such as ability of work vehicles and homes to access the main road network and facilities that support employment. The council aims to further Brent's reputation as a place that welcomes diversity. Therefore the design and layout of Gypsy and Travellers' sites, particularly at their edges, should look to integrate well with its surroundings and promote opportunities for positive interaction.

#### LONDON PLAN

##### H16 Gypsy and Traveller Accommodation

The following policy proposes to take forward a slightly amended existing policy in the Brent Local Plan. Underlines shows new text, ~~strikethrough~~ shows removed text.

#### POLICY BH10 ~~DMP-16~~ RESISTING HOUSING LOSS

~~In addition to circumstances identified in London Plan Policy 3.14~~

**dDevelopment resulting in the net loss of residential ~~units~~ dwellings will be supported only in exceptional circumstances where:**

- a) **sub-standard units dwellings would be brought in line with London Plan space standards;**
- b) **de-conversion of flats would create a family size home (3 bed or more) resulting in the net loss of no more than one dwelling of 2 bedrooms or less;**
- c) **providing social or physical infrastructure to meet an identified local need which could otherwise not exist;**
- d) **~~the proposed loss of housing would radically improve the neighbourhood.~~**

#### ALTERNATIVE POLICY CONSIDERED

**6.2.109 No policy.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan.

**6.2.110 Fewer criteria related to the circumstances in which loss will be allowed.** This is not considered appropriate as it will a) potentially maintain poor quality accommodation, b) result in the potential loss of family sized homes, or a number of homes to create fewer dwellings. c) It would result in desirable/ needed social or physical infrastructure not being developed.

#### JUSTIFICATION

**6.2.111** The housing targets for Brent will be challenging to achieve. Loss of existing housing to make way for other forms of development would exacerbate this. London Plan Policy H10 deals with the redevelopment of existing housing and estate regeneration. Brent seeks to supplement this policy by providing greater clarity on locally specific additional circumstances it is likely to consider such loss appropriate.

**6.2.112** Some of Brent's housing stock does not meet national housing space standards and has poor standards of occupier amenity. This is particularly the case for dwellings created without planning permission but now established. In these situations their loss and replacement with fewer dwellings achieving standards would be supported.

**6.2.113** As identified in the SHMA and Policy BH6 Housing Size Mix provision of family accommodation (3 bed or more dwellings) to meet Brent's needs is a priority. Consequently, the de-conversion of flats into a family size dwelling will be supported where it results in the net loss of no more than one dwelling of 2 bedrooms or less.

**6.2.114** Exceptional circumstances may arise in Brent where a loss of residential floor space will be acceptable in order to achieve Brent's strategic priorities. Situations include meeting an essential identified local need, e.g. overcoming a deficiency of local social infrastructure such as nursery space, place of worship, or physical infrastructure that cannot be avoided such as a significant transport improvement.

#### APPLICATION INFORMATION

**6.2.115** Supporting evidence showing conformity with the policy, e.g. comparison

of existing accommodation with that proposed in meeting current policy requirements around space and amenity, or justification for exceptional loss of residential accommodation to meet wider community benefits.

The following policy proposes to take forward a slightly amended existing policy in the Brent Local Plan. Underlines shows new text, ~~strikethrough~~ shows removed text.

## POLICY BH11 ~~DMP-17~~ CONVERSION OF FAMILY SIZED DWELLINGS

**To maintain family size housing conversion of a family sized home (3 bedrooms or more) to two or more other dwellings will only be allowed where the following criteria are met:**

- a) **the existing home is 130 sq.m. or more or could acceptably be extended to be that size; and**
- b) **it results in at least a 3-bedroom dwelling, preferably with direct access to a garden/ amenity space**
- c) **it is within an area of PTAL 3 or above.**

**Exceptions to this will only be allowed where the amenity of the existing family sized home is so deficient that family occupation is unlikely and it could not reasonably be changed to overcome such deficiencies.**

## ALTERNATIVE POLICY CONSIDERED

**6.2.116 No policy.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan.

**6.2.117 Conversion of family sized dwellings will be considered in any location despite its public transport accessibility.** This is not considered appropriate as it will encourage development in areas where occupants are likely to be more dependent on the car/private vehicles. This will have adverse impacts on congestion/air quality and quality of areas.

**6.2.118 Conversion of smaller properties than 130 sq.m. allowed.** This is not considered appropriate as it will create situations which promote dwellings that are either too small to meet London Plan size standards.

## JUSTIFICATION

**6.2.119** Conversion of existing housing stock into smaller dwellings provides many

additional homes across London and Brent. Nevertheless, family housing to meet local needs is also a Brent priority. In recognition of this priority it is therefore appropriate to identify circumstances when loss of family housing is likely to be acceptable. Residential conversion in other cases is addressed by London Plan policies, the contents of the Housing SPG and Policy BD1 General Development Management Policy.

**6.2.120** The policy seeks to allow for efficient use of existing housing stock through the conversion of existing larger dwellings to assist in meeting housing targets. However, it also seeks to ensure continued provision of family sized housing (3 bedrooms or more) houses or flats suitable for occupation by families to meet Brent's housing needs. Consequently where larger properties are suitable for conversion, schemes should include at least a 3-bed or more dwelling suitable for at least 4 people. Ideally the family sized accommodation will be at ground floor (if there is no access to a lift) to provide for ease of entry and also have direct access to associated amenity space. The minimum size of 130 sq.m. for the existing home can take into account its potential to extend through permitted development rights not yet implemented, or potential extensions which will be consistent with Brent's Residential Extensions and Alterations Supplementary Planning Document. This size is used to ensure that the proposed dwellings within the development would be London Plan Policy D4 space compliant. Effort should be made to provide all additional flats with amenity space.

**6.2.121** In exceptional circumstances the council may accept the conversion of a family sized dwelling to two or more 1 or 2 bedroom dwellings. This will be appropriate where the existing dwelling is likely to be so deficient in terms of its amenity for family accommodation and it could not reasonably be changed to overcome such deficiencies. Lack of a garden/ amenity space will not automatically allow for the conversion of dwelling into smaller dwellings. Other amenity factors will also be taken into account in deciding whether an existing family sized dwelling provides or has the potential to provide a good family environment. This will include location and other factors. For example, above a retail parade in a centre may have adverse associated impacts such as disturbance caused by hours of opening, noise, smells, constrained access width to upper floors and other issues.

## APPLICATION INFORMATION

**6.2.122** Supporting evidence showing conformity with the policy, e.g. comparison of existing accommodation with that proposed in meeting current policy requirements around space and amenity, or justification for exceptional loss of family accommodation.

The following policy proposes to take forward a slightly amended existing policy in the Brent Local Plan. Underlines shows new text, ~~strikethrough~~ shows removed text.

### POLICY BH12 ~~DMP18~~ DWELLING SIZE AND RESIDENTIAL OUTBUILDINGS

~~The size of dwellings should be consistent with London Plan Policy 3.5 Table 3.3 Minimum Space Standards for New Dwellings.~~

**Planning permission will only be granted for outbuildings that will not be residential accommodation or do not support the increased occupation of a dwelling.**

## ALTERNATIVE POLICY CONSIDERED

**6.2.123 No policy.** This is not appropriate as it would encourage many of the problems currently associated with misuse of garden buildings by unscrupulous landlords.

**6.2.124 To allow conversion of outbuildings in situations which enhance the accessibility of care provision for dependant family members.** Conversion must include the development of facilities which help the disabled in their day to day lives and do not lead to compromises in living conditions. This is not considered appropriate as it is dependent on the occupiers' characteristics, which will change over time. As such it will be difficult to enforce and potentially open to abuse.

## JUSTIFICATION

**6.2.125** The policy seeks to reduce the potential for overcrowding of residential properties through means available through the planning process. In particular it seeks to reduce the potential addition or use of outbuildings to increase the capacity of a dwelling's occupation.

**6.2.126** London Plan Policy 3.5 D4 and also the Housing SPG give significant direction

on the standards and quality that residential development is expected to achieve. In Brent all new housing should comply with the Housing SPG standards. Brent has a high proportion of overcrowded dwellings. It also has some very poor quality private rented accommodation. The council is taking measures through its statutory roles related to housing in improving the quality of residential accommodation in the Borough and the reducing the incidences of poor properties. Planning has a complementary role to play in reducing the opportunities for overcrowding to occur.

**6.2.127** 'Beds in sheds' are a prevalent issue in Brent. These are buildings or structures in gardens either used as self-contained accommodation or for 'primary' living accommodation (eg. kitchens, toilets, bathrooms, bedrooms and living spaces) ancillary to the main dwelling. Often this accommodation is built without planning consent, often with great effort to conceal its use and if detected a retrospective application sought for its retention. Brent's experience means the council considers that such development is unlikely to provide a satisfactory residential environment for its occupants, or if ancillary, for those in the main house. It often adversely impacts on neighbours through an over-intensification of use.

## APPLICATION INFORMATION

**6.2.128** For buildings ancillary to residential accommodation, clarity on the purpose of the building and agreement to a planning condition restricting use of the building to not include sleeping accommodation, bathrooms, laundry rooms or kitchens.

The following policy proposes to take forward an existing policy DMP19 in the Brent Local Plan without amendment.

### POLICY BH13 ~~DMP19~~ RESIDENTIAL AMENITY SPACE

**All new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This is normally expected to be 20sqm per flat and 50sqm for family housing (including ground floor flats).**

## ALTERNATIVE POLICY CONSIDERED

**6.2.129 No policy.** This is not appropriate as it will likely result in minimum standards





which are consistent with inner London characteristics being delivered in most cases.

**6.2.130 Require mid-point between proposed policy and London Plan minimums.** This is not considered appropriate as the amount of space identified in the policy is for the most part being delivered and providing better quality homes/accessible amenity for dwelling occupiers.

**6.2.131 Require greater than policy requirements.** This is not considered appropriate due to the increase in higher density development that is likely to be required in the future. The current policy approach is considered to provide the right balance between meeting occupiers needs and not over-burdening a development in terms of over-compromising on dwellings achieved and developer costs.

## JUSTIFICATION

**6.2.132** The policy seeks to ensure a suitable level of provision of amenity space in association with residential development. It identifies for Brent a locally distinctive target reflective of a historic approach to provision of amenity space, rather than the minimum standards set in the London Plan Policy D4.

**6.2.133** The London Plan Housing SPG sets out a baseline minimum standard amount for the provision of amenity space in new developments and the characteristics it is expected to have. It also deals with children's play space. Brent has historically sought and often delivered within higher density schemes higher levels of amenity space based on its own standard which it considers should be maintained.

**6.2.134** New developments should provide private amenity space to all dwellings, accessible from a main living room without level changes and planned within a building to take maximum advantage of daylight and sunlight. Where sufficient private amenity space cannot be achieved to meet the full requirement of the policy, the remainder should be supplied in the form of communal amenity space. The calculation of amenity space does not include any parking, cycle or refuse and recycling storage areas.

## 6.3 SOCIAL INFRASTRUCTURE



## SOCIAL INFRASTRUCTURE

### WHERE ARE WE?

- 6.3.1** Brent has a range of community facilities including health, education, leisure, culture and sports facilities which provide essential services to residents. These facilities contribute to a good quality of life and play a vital role in supporting Brent's diverse community; reducing inequality and helping to promote social inclusion and cultural wellbeing.
- 6.3.2** Rapid population growth and the high housing target set for Brent in the London Plan has generated increased need for community and social facilities at the same time as pressure on existing facilities has increased.

### WHERE DO WE WANT TO BE?

- 6.3.3** Development in Brent will be supported by new and improved community facilities to meet the needs of the growing population. Facilities will be located in accessible locations throughout the borough in response to identified need and will be flexible, adaptable and open to the wider community outside of core hours. There will be reduced pressure on sites to convert to higher-value uses such as residential and new facilities will be co-located as part of mixed-use developments to support large developments coming forward in Brent's Growth Areas.

#### NATIONAL and LONDON PLAN

- London Plan S1 Developing London's social infrastructure
- London Plan S2 Health and social care facilities
- London Plan S3 Education and childcare facilities
- London Plan S4 Play and informal recreation
- London Plan S5 Sports and recreation facilities
- London Plan S6 Public toilets
- London Plan S7 Burial space

## POLICY BS11: SOCIAL INFRASTRUCTURE AND COMMUNITY FACILITIES

### EXISTING SOCIAL INFRASTRUCTURE

**Existing social infrastructure and community facilities will be protected and retained unless it can be demonstrated that:**

- a. **The existing facility is not viable in its current use and there is no demand for any other suitable community use on the site; and**
- b. **The loss of social infrastructure would not result in a shortfall in provision of that use; or**
- c. **A replacement facility that would better meet the needs of existing users is provided; or**
- d. **Redevelopment is part of an agreed programme of social infrastructure re-provision to ensure continued delivery of social infrastructure and related services, as evidenced through a service delivery/estates strategy**

**Where there is no longer a community need for the facility's current use, the potential of re-using or redeveloping the existing site for an alternative social infrastructure use, particularly educational, religious or specialist housing, must be considered before other uses are pursued.**

### NEW SOCIAL INFRASTRUCTURE

**Proposals for new or enhanced social infrastructure facilities, including the consolidation of existing facilities, will be supported by the Council where:**

- e. **easily accessible by public transport, walking and cycling, preferably in town centres or Growth Areas**
- f. **located within the community they are intended to serve**
- g. **provided in flexible and adaptable buildings**
- h. **ideally co-located with other social infrastructure uses maximising wider community benefit, through if necessary, requiring formal community use agreements**

### ALTERNATIVE POLICY CONSIDERED

- 6.3.4 No policy to manage existing social infrastructure.** The policy has aspects covered by social infrastructure policies in the London Plan. At the local level the policy does however identify Growth Areas as preferred locations and also

education, religion and specialist housing as a preferred use if an existing use is no longer required.

## JUSTIFICATION

**6.3.5** Social infrastructure (also referred to as community and cultural facilities) plays a vital role in supporting Brent's diverse community, reducing inequality and helping to promote social inclusion and cultural wellbeing. The Council defines social infrastructure as a wide variety of services that are essential to the sustainability and wellbeing of a community. This could include the following:

- Educational facilities including early years education, primary education, secondary, special schools, further education and adult learning;
- Health services including primary and secondary health;
- Sports and leisure facilities including swimming pools, sports halls and outdoor sports spaces;
- Libraries;
- Places of worship;
- Theatres, music, galleries and other cultural space;
- Community space, meeting rooms and halls;
- Specialist/supported housing
- Fire stations, ambulance stations, policing and other criminal justice or community safety facilities; and
- Public houses

**6.3.6** This list is not exhaustive and other facilities can be included as social infrastructure.

**6.3.7** As Brent's population continues to grow and diversify it is essential that the local need for community facilities is adequately met. It also needs to be designed to be easily accessible and adaptable. This will allow it to be better used and more likely to be viable in the longer term. It will also meet users' needs without the need to invest substantial sums, which for most community groups are unlikely to be available. Social infrastructure should also be used to its maximum potential, which often is not currently the case due to occupier practices. To promote community cohesion and make best use of land the multiple use of new premises will be sought. Where relevant, Community Use Agreements (CUA) will be secured to ensure dual use through s106 planning obligations. The development and implementation of

CUAs can help support well-managed and safe community access to facilities, for example on educational sites. This can also encourage other outcomes. As well as widening access to facilities and providing clarity on their use CUAs can help to enhance links between community groups, educational establishments and sports clubs.

**6.3.8** Across Brent's Growth Areas, significant developments will come forward over the Local Plan period which will provide opportunities for the provision of new social infrastructure and the enhancement of existing facilities.

**6.3.9** Brent's Local Plan will play an important role in safeguarding existing infrastructure. It will also ensure that new development seeks to provide adequate new infrastructure to meet the needs of a growing population. This will be either by delivering facilities onsite or adjacent to it or through payments made to the council to ensure facilities are provided in another location within or sometimes outside the borough. In other cases it might be through policies that identify specific sites for infrastructure or facilitate its delivery subject to it meeting criteria that make its provision acceptable in planning terms.

**6.3.10** Significant pieces of social infrastructure that are currently known about or predicted to be required are set out in the infrastructure delivery plan. Further details are provided in the delivery and monitoring chapter. This will be updated on a rolling basis, taking account of information that is available at the time. It is clear that against a background of significant population growth that the requirements for social infrastructure will be significant. Against a current and likely future background of public sector funding restrictions, there is a substantial predicted deficit in finance to deliver much of what is required. The Mayor and council will continue to lobby for sufficient funds to properly support growth.

## 6.4 ECONOMY AND TOWN CENTRES



## ECONOMY AND TOWN CENTRES

### WHERE ARE WE?

- 6.4.1** Brent's economy is currently home to 14,500 businesses employing 113,500 people and generates a Gross Value Added to the economy of more than £7.9billion. The borough has experienced strong economic growth in the past five years. The number of jobs has increased by 17%, and the number of businesses by 24%. The borough has a diverse business base; micro businesses (employing up to 9 people) comprise 89% of businesses. Unemployment levels have been reducing. They remain higher than the London average, and particularly high amongst women. In April 2017, median gross weekly earnings for full-time employees in Brent was £564, up 3.6% from 2016. This is still well below the average for Outer London (£631) and London (£654). This reflects many of Brent's main employment sectors being lower skilled and therefore typically lower paid.
- 6.4.2** The largest employment sectors in Brent are public administration, education and health; retail; hospitality, leisure and recreation and business support services. Combined these four sectors account for around 55% of employment in Brent. Other specialisms include wholesale, logistics, transport and manufacturing, particularly food manufacturing. There are variations in sector representation across the borough. In the south east there is a higher concentration of employment in ICT, media, creative services, professional and financial services. To the south west manufacturing, logistics, wholesale and transport. Whilst in north and central Brent health, public services and administration are the main sectors. Wembley also has a focus on tourism and retail.
- 6.4.3** Brent's economic hubs are provided across a range of locations. Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) are larger industrial estates which cater for a wide range of industrial uses and account for 374.5ha of Brent's industrial land. These include Park Royal SIL, London's largest industrial site, and Alperton LSIS. Park Royal has been designated by the Mayor of London as an Opportunity Area, and planning policy for this area is contained within the Old Oak and Park Royal Development Corporation Local Plan. Local employment sites account for 90ha of industrial land, and are smaller scale often embedded in residential areas. Town centres also accommodate many businesses as well as the more

obvious retail and leisure uses. Brent's industrial estates are generally low density. Whilst some contain modern well managed premises, others are in a poorer condition and have seen limited investment.

- 6.4.4** To support businesses and the local economy the council has established a Brent Business Board looking at promoting West London (as part of the West London Alliance) and specifically Brent as a business location.
- 6.4.5** Brent's town centres play an important role in supporting the borough's economic vitality and reflect the diversity of the communities that they serve. Brent's town centres provide 20% of jobs within the borough and over the last decade significant investment has delivered improvements to the overall retail and leisure offer including the London Designer Outlet and the Digital High Street initiative. Despite this, the borough's town centres still face significant challenges. Vacancy rates in several centres far exceed the London average and local businesses face tough competition from online shopping and out-of-town shopping centres such as Brent Cross and Westfield. Brent has none priority town centres which each have an assigned town centre manager. The council is producing town centre action plans that deal with objectives related to retail, improving the economy, making centres more attractive and accessible, allowing them to better meet the needs of the surrounding community and providing for additional housing opportunities.

### WHERE WE WANT TO BE

- 6.4.6** To reduce inequalities Brent has to move to a higher wage economy, fostering conditions where business and individuals can develop and succeed.
- 6.4.7** Some sectors in Brent are at risk from automation and changes in technology and patterns of trade. Supporting existing business is important. However, we also need to enable future growth sectors such as the low carbon circular economy, science and technology, and creative industries. This will involve improving infrastructure, particularly Digital and 5G networks, and securing a range of high quality workspaces, including affordable, incubator, accelerator and co-working space.
- 6.4.8** For individuals access to skills, education and training will be key. Brent already benefits from a number of major employers in education and health. The University of Westminster's School of Media, Arts and Design is located at Northwick Park as is Northwick Park Hospital. The College of North West London

has campuses at Willesden and Wembley. There is scope to further improve all of these facilities, increase access to employment and high quality education. For example the College of North West London is looking to consolidate its facilities into one at Wembley Park. The council is very supportive of this because of the benefits it will bring to the college, its students and also the place making of Wembley. In addition, it will be important to capture the benefits of development for local people. For instance, by ensuring they can access the employment and training opportunities they bring.

**6.4.9** The London Plan identifies Brent as having potential to provide additional employment floorspace capacity. To achieve this we will need to make better use of our industrial sites. This will be through their intensification, and where appropriate co-location with other uses to promote investment. The Place chapters deal more specifically with how particular employment areas will address the issue of retaining floorspace/conditions for business to thrive, their intensification and investment.

**6.4.10** The London Plan also emphasises the importance of town centres and seeks to promote and enhance their vitality and viability to create hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, social infrastructure and residential development. To pre-empt and prevent further decline of Brent's high streets, mixed-use developments will be encouraged on the peripheries of town centres, providing space for developments containing a mix of housing, workspace and/ or community facilities. The council will develop short, medium and long term action plans for its priority town centres. The wider role of town centres will be addressed in this section, the housing and heritage and culture sections, as well as the individual places.

## LONDON PLAN

London Plan E1 Offices

London Plan E2 Low-cost business space

London Plan E3 Affordable workspace

London Plan E4 Land for industry, logistics and services

London Plan E5 Strategic Industrial Locations (SIL)

London Plan E6 Locally Significant Industrial Sites

London Plan E7 Intensification, co-location and substitution

London Plan E11 Skills and opportunities for all

London Plan SD6 Town Centres

London Plan SD7 Town Centres Network

London Plan SD8 Town Centres: Development principles and Development Plan Documents

London Plan SD9 Town Centres: Local Partnerships and implementation

## POLICY BE1 ECONOMIC GROWTH AND EMPLOYMENT OPPORTUNITIES FOR ALL

**Enterprise hubs will be created in each Growth Area. The enterprise hub in South Kilburn Growth Area will be protected. In other Growth Areas 10% of new employment floorspace within major developments exceeding 3000 sqm is to be managed affordable workspace.**

**Educational quarters at Northwick Park and Wembley will be protected and enhanced.**

**An Employment, Apprenticeship and Training Plan will be required for all major developments, to be prepared in partnership with Brent Works or any successor body.**

## ALTERNATIVE POLICY CONSIDERED

**6.4.11 To not secure affordable workspace in Growth Areas:** Mixed-use development creates more vibrant places and reduces the number and length of journeys for employment, shopping, leisure and other activities. The majority of Brent's Growth Areas are located in areas with high levels of deprivation. Securing affordable workspace will be important to support economic growth and create sustainable communities.

**6.4.12 To not promote areas of the borough as creative hubs:** Protecting and promoting creative hubs is consistent with the need to move to future growth sectors and a higher waged economy. Failure to protect workspace for creative industries could result in additional homes being delivered, but this does not outweigh the negative impacts on the local economy.

## JUSTIFICATION

- 6.4.13** The Granville in South Kilburn Growth Area is a good example of how enterprise hubs can support the local economy and foster a sense of community. The Granville is managed by South Kilburn Trust, and was developed with support from the council and Mayor of London. It provides an affordable range of enclosed office, shared studio and dedicated desk space, as well as training opportunities for local people. Securing affordable workspace in all Growth Areas will contribute to creating vibrant places where people want to live. It will also be important to meet the London Plan requirement for Brent to provide additional employment floorspace. Affordable workspace will be secured in perpetuity as detailed further in paragraph 6.4.26.
- 6.4.14** In some circumstances rather than provide workspace on-site, it may be appropriate for developments to provide financial contributions to delivering affordable workspace elsewhere within the Growth Area. For example where this would create one larger enterprise hub, with shared management arrangements. Discussion with the council and operators will determine where this is appropriate.
- 6.4.15** Northwick Park Hospital, University of Westminster and College of North West London are major employers in Brent. In some cases their premises are becoming dated. The council will support proposals which will improve, modernise and consolidate their facilities, so they can better meet future healthcare and educational needs. Any reduction in floorspace for education that results in a loss of capacity for learners will be resisted.
- 6.4.16** Brent Works provides developers and businesses support in training and recruitment. This benefits the business by helping to provide access to a skilled workforce. It also ensures local people benefit from the employment, apprenticeship and training opportunities development can bring. Major developments will be required to produce an Employment, Apprenticeship and Training Plan in line with guidance produced by Brent Works. Developers should engage with Brent Works at the earliest stage to discuss their needs.





POLICY BE2 STRATEGIC INDUSTRIAL LOCATIONS (SIL)  
AND LOCALLY SIGNIFICANT INDUSTRIAL SITES (LSIS)

**Within SIL and LSIS development will be supported where it intensifies employment uses and accords with the principles as follows:**

EMPLOYMENT SITE	DESIGNATION	POLICY APPROACH	
East Lane	SIL	<p><b>Intensification</b></p> <p>These sites will be protected for solely employment uses within use class B1c, B2, B8 and closely related sui generis uses. Development will be supported which increases the amount of employment floorspace. Any loss or reduction in floorspace will be resisted.</p>	
Northfields (west)	SIL		
Alperton (central)	LSIS		
Alperton (south)	LSIS		
Brentfield Road	LSIS		
Kingsbury	LSIS		
Wembley	SIL	Intensification as above, with exception of site allocations.	
Staples Corner	SIL	<p><b>Intensification through co-location</b></p> <p>On these sites intensification through co-location will be supported, subject to a comprehensive masterplan approach produced with or agreed by the council demonstrating the following will be achieved:</p> <ul style="list-style-type: none"> <li>• Conformity with London Plan policy E7;</li> <li>• a net increase in employment floorspace;</li> <li>• a mix of employment floorspace will be delivered reflective of borough needs, including start-up space, move on space in use class B1(b), B1(c), B2 and B8;</li> <li>• proactive engagement with existing businesses to seek to retain them on site where possible, and support for any businesses that cannot be incorporated to relocate off site;</li> <li>• 50% affordable housing;</li> <li>• 10% managed affordable workspace;</li> <li>• the development is of a high quality design and will result in sustainable development, well served by community facilities and open space; and</li> <li>• any potential conflicts between uses can be mitigated and a high standard of amenity achieved.</li> </ul>	
Alperton (north)	LSIS		
Church End	LSIS		
Colindale	LSIS		
Cricklewood	LSIS		
Honeypot Lane (Lowther Road)	LSIS		
Honeypot Lane (Westmoreland Road)	LSIS		
Neasden Lane	LSIS		
Northfields (east)			Co-location subject to as a minimum providing the amount, typology, and affordability of employment floorspace consistent with planning permission 18/0321.

## ALTERNATIVE POLICY CONSIDERED

**6.4.17 To allow co-location on all SIL and LSIS sites:** The suitability of all SIL and LSIS in the borough for co-location was assessed based on an analysis of whether they are sustainable locations for housing; compatibility with existing employment functions; regeneration potential and viability. It was found a number of sites were not sustainable locations for co-location due to incompatible uses including protected waste sites and power stations, which are expected to remain in situ over the plan period, lower public transport accessibility levels and lack of social infrastructure.

**6.4.18 To protect all SIL and LSIS for employment use only:** The council has taken this approach historically and during this period there has been a lack of investment in new employment floorspace. Across London this approach has resulted in a loss of employment land to residential. Viability work indicates a degree of co-location is needed on some employment sites to enable investment in employment floorspace.

## JUSTIFICATION

**6.4.19** London Plan policy E7 states the industrial uses within SIL or LSIS are to be intensified. This will deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing. Policy BE2 is needed to set out Brent's approach to co-location and intensification based on an analysis of SIL and LSIS.

**6.4.20** In calculating what constitutes the minimum floorspace requirement required in any site's redevelopment, the existing employment floorspace or a plot ratio of 0.65 will be applied, whichever is the higher. Brent's employment areas contain a number of sui generis uses, such as trade merchants. These in the future could reasonably convert to other industrial uses to help meet demand for industrial, storage and warehousing. Therefore for the purposes of calculating existing floorspace the council will include all floorspace within the B use class and closely related sui generis uses. Where a site has been long-term vacant or converted to uses which are not compliant with SIL and LSIS the level of floorspace will be based on plot ratio.

The following policy proposes to take forward an amended part of existing policy in the Brent Local Plan that relates to Local Employment Sites Policy DMP14.

Underlines shows new text, ~~strikethrough~~ shows removed text.

## POLICY BE3 LOCAL EMPLOYMENT SITES AND WORK-LIVE

**The council will allow the release of Local Employment Sites to non-employment uses where:**

- a) **continued wholly employment use is unviable; or**
- b) **~~significant benefits consistent with the wider objectives of the Development Plan are achieved~~ development increases the amount of maximum amount of existing employment floorspace on site, and that employment floorspace is provided as Managed Affordable Workspace possible.**

**Work-Live units will be acceptable where they are managed by an organisation committed to their use primarily for employment, as evidenced by a management plan. Loss of Work-Live units to residential will be resisted.**

## ALTERNATIVE POLICY CONSIDERED

**6.4.21 To allow Local Employment Sites to be lost without any re-provision:**

Although this has potential to increase housing delivery, it will be damaging to the local economy and sustainability. This would be contrary to the requirement in the NPPF for planning policies to support economic growth, taking into account local business needs. It would also make it challenging for Brent to increase employment floorspace as required by the London Plan.

**6.4.22 To protect all viable Local Employment Sites for employment use only:**

The NPPF requires the most effective use of land, including through mixed-use schemes. It would not be an effective use of land to protect it for employment use only, where it can be demonstrated development can increase employment floorspace and deliver other uses such as housing.

**6.4.23 To secure affordable workspace on site in all circumstances:** The Brent Workspace Study indicates demand for affordable workspace in the borough is currently limited to certain locations. This is primarily in Growth Areas, town centres, or to the south of the borough which has better links with Central London. Securing workspace in areas where there is no demand will result in space which is unlikely to be occupied.

## JUSTIFICATION

**6.4.24** Local Employment Sites are sites outside of SIL and LSIS in employment use within the B use class and closely related sui generis uses. They make an

important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy allows for the release of unviable employment floorspace or, where appropriate, mixed-use development. This is consistent with the NPPF which requires the efficient use of land.

- 6.4.25** Under criterion a of Policy BE3, to demonstrate there is no demand for a Local Employment Site for ongoing employment use the applicant must submit evidence that the site is vacant and a thorough marketing exercise at realistic prices for the area has been sustained over a 24 month period. Marketing must be through a commercial agent at a price that genuinely reflects the market value in relation to use, condition, quality and location of floorspace. A professional valuation of the asking price and/or rent will be required from at least three agents to confirm that this is reasonable. It must be demonstrated that consideration has been given to alternative layouts and business uses, including smaller premises with short term flexible leases appropriate for SMEs.
- 6.4.26** Under criterion b of Policy BE3, in exceptional circumstances a mixed-use development incorporating non- employment uses may be appropriate. The applicant must demonstrate that redevelopment will result in:
- an increase in the amount of employment floorspace on the site;
  - all workspace is provided as managed affordable workspace to meet development needs of businesses in Brent, particularly SMEs, or the accommodation of the existing employment use;
  - delivery of wider regeneration benefits to the community; and
  - employment floorspace with a very strong prospect of being occupied.
- 6.4.27** As evidence the employment space will be occupied the council will require a letter of agreement from the current employment use operating from the site stating their intent to occupy the proposed floorspace. Alternatively, managed affordable workspace should be provided for start-up companies or 'move on' space for SMEs. B1 (c) floorspace will be prioritised to meet the identified need for this form of employment space in the borough. A Managed Workspace Provider should be engaged at the earliest stage, before pre-application advice is sought, to ensure space is fit for purpose. The council's list of approved Managed Affordable Workspace providers is available at: [www.brent.gov.uk/your-community/regeneration/affordable-workspace](http://www.brent.gov.uk/your-community/regeneration/affordable-workspace). Affordable workspace will be secured in perpetuity. To demonstrate the units are affordable the applicant should submit evidence of

agreement to lease the space to an approved Managed Workspace Provider at no more than 50% of comparable local market rate. Each lease should cover a period of at least 10-15 years. This will be secured via a S106 planning obligation, with the provider being party to the agreement. The fit out of the workspace should be to ready to occupy level, to a specification agreed with the Managed Workspace Provider. An Affordable Workspace Management Plan will be required for the space, agreed between the Affordable Workspace Provider and council, covering how the space will be managed, rent levels and reasonable priority for local people. Consideration will be given to the requirements of the Managed Workspace Provider.

- 6.4.28** In areas with existing or emerging creative clusters workspace is to be provided on-site. This is Harlesden, Wembley Growth Area, Willesden Green, Alperton Growth Area, Kilburn, Queen's Park, Burnt Oak Colindale Growth Area, and Church End Growth Area. Elsewhere in the borough if there is no demand for workspace financial contributions will be secured to re-provide equivalent employment floorspace elsewhere.
- 6.4.29** Work-Live is the combination of living accommodation (Use Class C3) with workspace (Use Class B1, but not B2 or B8) within a single self-contained unit. Applications for Work-Live development must be supported by a management plan agreed by the council which demonstrates the units will be managed by an organisation committed to their long term management primarily for employment. An indicative ratio of 70:30 in favour of the work element will be sought.

The following policy proposes to take forward a slightly amended existing policy in the Brent Local Plan that relates to Policy DMP4 Supporting Strong Centres. Underlines shows new text, ~~strikethrough~~ shows removed text. A1 uses are shops, A2 uses are financial and professional services, A3 uses are restaurants and cafes, A4 are drinking establishments and A5 are hot food takeaways.



## POLICY DMP2 BE4: SUPPORTING STRONG CENTRES DIVERSITY OF USES

**No further A4 or A5 uses will be permitted within the defined Primary Shopping Frontage of Brent's town centres.**

**Non-A1 or A2 uses will be permitted within town centres where:**

- a) it would not reduce the proportion of frontage in A1 and A2 use to less than 65% of the primary frontage; or
- b) if vacancy rates exceed 10% of primary frontage it would not reduce the proportion of frontage in A1 and A2 use to less than 50%; and
- c) the proposal provides, or maintains, an active frontage.

**Unviable secondary frontage on the periphery of town centres will be promoted for employment, social infrastructure and residential uses.**

## MEANWHILE USES

**The use of vacant sites or buildings for occupation by temporary uses that will benefit a town centre's viability and vitality will be permitted. Proposals for new markets, including farmers' markets and street-food markets, will be encouraged as well as other seasonal/ temporary uses. Temporary entertainment and leisure uses will be supported, particularly those which enhance and promote Brent's heritage and culture.**

## RETAIL IMPACT ASSESSMENTS

**Proposals involving 500 sqm or above gross retail or leisure floorspace, which are outside of town centres and do not accord with the Local Plan, should be accompanied by an Retail Impact Assessment.**

## ALTERNATIVE POLICY CONSIDERED

**6.4.30 No policy to support the role of town centres:** This is not appropriate as it would not be regarded as being in general conformity with the London Plan or the NPPF.

**6.4.31 To permit all new non-A1 or A2 uses within town centres, with no restriction on A4 and A5 uses within Primary Shopping Frontages and no requirement for a Retail Impact Assessment:** This is not appropriate as it would undermine the clearly defined retail role of Brent's town centres and would prevent centres from meeting the shopping needs of residents. It

would be inappropriate not to require a Retail Impact Assessment for large retail and leisure developments out of town centres as this would not be in general conformity with paragraph 89 of the NPPF.

- 6.4.32** To refuse all applications for non-A1 or A2 uses within town centres: This is not appropriate as the changing role of town centres requires some flexibility in uses allowed to maintain a viable town centre and keep vacancy rates at a sustainable level. Where units are no longer viable for A1 and A2 use it is considered acceptable to permit other uses such as restaurants and cafes, drinking establishments and hot food takeaways provided they do not undermine the retail function of the town centre. Where unviable Secondary Shopping Frontage falls outside the Primary Shopping Area it would be inappropriate to refuse conversion to residential use as this would not be in general conformity with the London Plan.

## JUSTIFICATION

- 6.4.33** The policy approach will also be applied in assessing permitted development prior approval applications for retail to residential and retail to a restaurant or café. The proportion of frontage is to be calculated based on the length of the primary frontage in metres in the centre as a whole.
- 6.4.34** The policy in identifying primary shopping areas, primary and secondary shopping areas, town centre boundaries, mix of uses within frontages and the need for a lower threshold for impact studies takes account of recent town centre health checks and the recommendations of the retail and leisure needs assessment.
- 6.4.35** Main town centre uses, as defined in the NPPF, will be considered acceptable in designated frontage subject to meeting other policy requirements. As an exception the conversion of peripheral secondary frontage to residential development will be permitted where this will not impact on the vitality and viability of the town centre.
- 6.4.36** Frontage will be considered peripheral at the outer edges of secondary frontages which show high levels of vacancy, particularly within a wider centre that is appearing to struggle. Where contraction of the centre is desirable by release of secondary frontage, it shall be done in a controlled manner starting from the outer edges and where its conversion would not result in residential development between frontage in main town centre use.
- 6.4.37** Developers will be required to demonstrate that the unit is unviable by

providing evidence. This will be that the unit has been vacant for a year despite an active marketing campaign, or that long term vacancy levels are such that uses could reasonably be relocated elsewhere in the centre. Marketing must be through a commercial agent at a price that genuinely reflects the market value in relation to use, condition, quality and location of floorspace. A professional valuation of the asking price and/or rent will be required from at least three agents to confirm that this is reasonable.

- 6.4.38** A 'meanwhile use' is the temporary use of vacant buildings or land for a socially beneficial purpose until such a time that they can be brought back into commercial use again. A 'meanwhile use' is not the same as a normal temporary lease or license because it recognises that the search for a commercial use is ongoing.
- 6.4.39** London Plan Policy SD6 requires the Brent Local Plan to promote and enhance the vitality and viability of the borough's town centres. The council has done this by allowing some flexibility in use where retail units are no longer viable and by placing restrictions to prevent over-concentrations of particular uses.
- 6.4.40** This preferred approach would restrict conversion from commercial to residential use to units outside of the designated Primary Shopping Area. This would preserve a defined area where retail development is concentrated but pre-empt and prevent future decline by encouraging mixed-use development on the periphery of town centres.
- 6.4.41** Several centres in Brent would benefit from a shortened high street with a condensed retail offer, strengthening their appeal and viability. This approach would also support efficient and effective land use to respond to local growth pressures and help to meet the council's housing targets.

The following policy proposes to take forward a slightly amended existing policy in the Brent Local Plan that relates to Non-Retail Uses DMP3. Underlines shows new text, ~~strikethrough~~ shows removed text.

## POLICY ~~DMP3 NON\_RETAIL USES~~ BE5: PROTECTING RETAIL IN TOWN CENTRES

### BETTING SHOPS, ADULT GAMING CENTRES AND PAWNBROKERS

**Betting shops, adult gaming centres and pawnbrokers will be permitted where it will result in:**

- a) **no more than 4% of the town centre frontage consisting of betting shops;**
- b) **no more than 3% of the town centre frontage consisting of adult gaming centres or pawnbrokers/payday loan shops;**
- c) **no more than 1 unit or 10% of the neighbourhood parade frontage, whichever is the greater, consisting of betting shops, adult gaming centres or pawnbrokers/payday loan shops;**
- d) **a minimum of 4 units in an alternative use in-between each.**

### TAKEAWAYS

**Subject to other policies within the development plan, takeaways will be approved except where it would result in:**

- a) **The introduction of any new A5 use within the designated primary frontage of a town centre;**
- b) **an A5 use within 400 metres walking distance of a primary school, secondary school or further education establishment entrance/ exit point;**
- c) **more than 6% of the units within a town centre frontage in A5 uses;**
- d) **more than 1 unit or 15% of the units within a neighbourhood parade, whichever is the greater, in A5 use;**
- e) **less than two three non-A5 units between takeaways; or**
- f) **on-street parking in front of the premises creating highway safety problems.**

**Policy WEM 26 in the Wembley Area Action Plan applies to takeaways in Wembley and Wembley Park centre.**

### SHISHA CAFÉS

**Shisha Cafés will only be permitted outside 400 metres walking distance of a secondary school or further education establishment entrance/exit point.**

## ALTERNATIVE POLICY CONSIDERED

**6.4.42 No policy to restrict non-retail uses.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan.

## JUSTIFICATION

**6.4.43** To ensure there is not an over-concentration of particular uses within any single length of frontage the policy seeks to prevent adult gaming centres, pawnbrokers, betting shops and takeaways locating in close proximity to a unit in the same use.

**6.4.44** The NPPF states planning policy is to take account of and support local strategies to improve health, social and cultural wellbeing. Local studies have found that takeaways and shisha cafés are impacting negatively on the health of Brent residents, particularly young people. Accordingly, to support local health strategies, this policy sets a limit on the proximity of these uses to secondary schools and further education establishments.

**6.4.45** Brent's town centre health checks indicate in the borough pawnbrokers often also provide a payday loan service, and these uses are often indistinguishable from each other, therefore for the purposes of this policy the term pawnbrokers is inclusive of payday loan companies.

**6.4.46** Further education establishments are those which deliver post-compulsory education for people over 16.

**6.4.47** The need to prevent an over-concentration of takeaways is supported by national and regional policy as well as a growing evidence base. This is due both to health implications and to preserve the primary retail function of Brent's town centres. While it is acknowledged that takeaways provide a convenience service to local communities, the retail-based role of town centres must be preserved and so an upper limit of 6% of units in a centre's frontage being in A5 use has been set as well as a restriction on any new A5 uses within the designated primary frontage of a centre. This approach allows takeaways to locate within town centres without jeopardising the retail function.

**6.4.48** In order to prevent an over-concentration of A5 uses within the secondary frontage of the borough's town centres there is a requirement to have no less than three non-A5 uses between takeaways. This will maintain a diverse and viable high street offer and restrict impacts on amenity.

**6.4.49** London Plan Policy E9 places restrictions on development proposals

containing A5 hot food takeaway uses. Any new A5 uses within 400 metres walking distance of an existing or proposed primary or secondary school should be refused.

The following policy proposes to take forward the existing policy in the Brent Local Plan that relates to Neighbourhood Parades and Isolated Shop Units DMP4. No changes to the policy are proposed. It is included for completeness. Underlines shows new text, ~~strikethrough~~ shows removed text.

## POLICY ~~DMP4~~ BE6: NEIGHBOURHOOD PARADES AND ISOLATED SHOP UNITS

**Loss of A1, A2, A3 uses or launderettes in neighbourhood parades or isolated shop units outside designated town centres will be permitted where the parade or unit is within 400 metres of equivalent alternative provision and;**

- a) **is unviable; or**
- b) **the proposal will provide a community facility for which there is a demonstrable need.**

**Where there is no equivalent alternative provision within 400 metres, loss will not be permitted unless retention is unviable for these range of uses with associated evidence to show that the premises having been vacant and actively marketed for a minimum of 2 years.**

**Where permitted, sympathetic retention of any existing shop front will be required unless a high quality alternative more sympathetic to the building's qualities or street scene will be delivered.**

### JUSTIFICATION

**6.4.50** Outside of town centres, neighbourhood parades and isolated shop units provide convenient access to goods and services which are needed on a day to day basis. To promote sustainable communities the loss of retail and services will be resisted in under-served areas.

**6.4.51** In determining applications for planning permission and retail to residential permitted development prior approval, development resulting in the loss of local retail and service provision will not be permitted unless there is alternative equivalent provision within 400 metres. This is considered a reasonable walking distance (5 minutes for the average person) to access convenience shopping and local services. Provision will be considered equivalent where it provides a similar

offer which meets the same need, such as the need for fresh food or a financial service. Marketing evidence will be required demonstrating an active marketing campaign for a continuous period of at least a year whilst the premises were vacant or in 'meanwhile use', which has shown to be unsuccessful. A change of use to a community facility such as a community centre will be permitted where it can be demonstrated there is a need for such provision. Demonstration of need must include evidence of consultation with service providers and the local community and an audit of existing provision within the local area.

**6.4.52** Where a loss of retail or local service is allowed, the most appropriate alternative use would be housing. In considering applications for alternative uses, particular regard will be given to the possible effect on the amenity of adjoining residential properties. The council's Shopfronts SPD3 (June 2018), provides further guidance on sympathetically converting shops to residential units.

The following policy proposes to take forward the existing policy in the Brent Local Plan that relates to Shopfront Design and Forecourt Trading DMP4A. No changes to the policy are proposed. It is included for completeness. Underlines shows new text, ~~strikethrough~~ shows removed text.

## POLICY ~~DMP4A~~ BE7: SHOP FRONT DESIGN AND FORECOURT TRADING

**Proposals for shop fronts and forecourts will be required to retain shop fronts of architectural or historic merit, demonstrate a high quality of design, complementing the building and adjoining properties.**

**Forecourt trading will be permitted where it does not cause an obstruction to pedestrians or nuisance to neighbouring residential occupiers.**

### JUSTIFICATION

**6.4.53** Shop fronts play a key role in establishing the character of Brent's town centres and neighbourhood parades. Policy BE7 is to ensure shop fronts and forecourts contribute to an attractive environment. It is supplemented by detailed guidance in the Shopfronts SPD3 (June 2018).

The following policy proposes to take forward the existing policy in the Brent Local Plan that relates to Markets and Car Boot Sales DMP5. No changes to the policy are proposed. It is included for completeness. Underlines shows new text, ~~strikethrough~~ shows removed text.

## POLICY DMP5 BE8: MARKETS AND CAR BOOT SALES

**The council will protect and promote markets by:**

- a) **resisting the permanent loss of existing retail market sites unless comparable provision is made or there is no demand for continued market use;**
- b) **supporting the improvement of existing retail markets, including storage and preparation space for traders to meet public health requirements; and**
- c) **giving favourable consideration to proposals for new markets in town centres which help diversify provision.**

**Planning permission for new markets and car boot sales will be subject to a Management Plan being agreed by the council.**

### ALTERNATIVE POLICY CONSIDERED

**6.4.54 No policy to manage markets.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan or the NPPF.

### JUSTIFICATION

**6.4.55** Markets can make an important contribution to the vitality of town centres and therefore are to be retained and enhanced. However, if poorly designed or managed, markets and carboot sales can cause harm to surrounding areas. This policy establishes the factors the council will consider when determining an application for such uses.

**6.4.56** Applications for markets and carboot sales must be accompanied by site layout plans and Management Plans. For carboot sales the layout plan should indicate vehicle trading areas, maximum number of vehicles, spacing and aisle widths. Management Plans must include details of time and duration of the sale, arrangements for marshalling access, parking, servicing, safety measures and signage, with arrangements for the display and/or collection of sellers' details.

**6.4.57** Management Plans for the operation of such sales should satisfactorily address the following considerations:

- The proposal should include adequate arrangements for the storage and/or collection of waste during the sales, as well as its disposal afterwards;
- The scale of activity, in terms of the number of pitches, is not excessive in relation to the scale of the centre;

- Any additional traffic generated by the sales would not cause unacceptable impact on the existing road network nor constitute a safety hazard;
- The access and parking arrangements for both trading and customer vehicles would not cause noise disturbance to nearby residents at unsociable hours; and
- In the case of carboot sales that provision for the parking of all trading vehicles is made on-site.

**6.4.58** Any permission granted for carboot sales would be for a limited period only (normally 18 months) and subject to a condition waiving an appropriate proportion of permitted development rights on the cessation of the planning permission. In all cases, permission will be made personal to a named person or persons, to ensure the responsibility and arrangements for the operation of the sale do not change without the knowledge and express consent of the planning authority.

**6.4.59** In addition to planning controls, the council manages proposals for new markets through its role in determining applications for street trading licenses.

The following policy proposes to take forward the existing policy in the Brent Local Plan that relates to Visitor Accommodation and Attractions DMP6. Changes to the policy are proposed. Underlines shows new text, ~~strikethrough~~ shows removed text.



## POLICY DMP6 BE9: VISITOR ACCOMMODATION AND ATTRACTIONS

**Visitor accommodation and attractions will be encouraged in Wembley Strategic Cultural Area. Future hotel provision will be encouraged in the two major town centres of Wembley and Kilburn. Hotels and other visitor accommodation will be appropriate in town centres in accordance with the sequential approach, and will be supported provided they:**

**permitted when not compromising the supply of land for new homes on allocated housing sites and the council's ability to meet its housing targets:**

- do not significantly compromise the supply of land for new homes on allocated housing sites and the council's ability to meet its housing targets;
- are inclusive and accessible, with applications for detailed planning permission accompanied by Accessibility Management Plans;
- are not occupied by any resident for 90 consecutive days or more; and
- create active ground floor frontages

**Proposals for hotel development must be inclusive and accessible with applications for detailed planning permission to be accompanied by Accessibility Management Plans.**

**Conditions will be applied to ensure visitor accommodation is not occupied by permanent residents.**

## ALTERNATIVE POLICY CONSIDERED

**6.4.60 No policy to manage hotels and other visitor accommodation.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan or the NPPF.

## JUSTIFICATION

**6.4.61** Hotels are classified by the NPPF as a main town centre use and the provision of a good range of hotel facilities is important in attracting visitor spend which can have potential spin-off benefits for town centres in instances where a hotel is well-sited within a centre in proximity to complementary uses such as bars and restaurants.

**6.4.62** The GLA has forecast future demand for serviced accommodation by borough, identifying a requirement for 2,622 net additional serviced accommodation rooms in Brent over the period 2015-40.

**6.4.63** Hotels and visitor accommodation are encouraged in the Wembley town centre to further strengthen existing provision and support the area's role and function as a destination for sports and entertainment. In Kilburn there is relatively limited provision at present given its proximity to central London. The development of additional hotel/ visitor accommodation facilities would further diversify the offer of the centre and potentially generate additional footfall and spend for existing businesses. It is important that where its ground floor faces a public space that it has an active ground floor frontage.

**6.4.64** In addition to hotels visitor accommodation includes aparthotels, guesthouses, bed and breakfast accommodation, self-catering facilities and youth hostels. Conditions will be applied to ensure visitor accommodation is managed appropriately as short term accommodation and rooms are not occupied for periods of 90 days or more.

**6.4.65** Design and Access Statements are to be sufficiently detailed to demonstrate that inclusive access is integral to the design and, in the case of hotels, an adequate choice of accessible room types is provided to all customers. Applications for hotel development are required to be accompanied by an Accessibility Management Plan (AMP) to demonstrate that the management and operation of accessible rooms is considered from the outset of the design. An AMP is distinct from a Design and Access Statement as its purpose is to ensure accessibility and inclusion are monitored and maintained throughout the life of the development. Both are to be prepared in keeping with the criteria set out in the Mayor's Town Centres SPG.

## EVIDENCE BASE

Brent Employment Land Demand Study 2015, URS

Brent Workspace Study 2017, Regeneris

West London Employment Study 2018, GL Hearn

Brent Retail and Leisure Need Assessment 2018, Urban Shape

## 6.5 HERITAGE AND CULTURE



## HERITAGE AND CULTURE

### WHERE ARE WE?

- 6.5.1** Brent has a comparatively low number of recognised heritage assets in the context of London, as identified in the spatial portrait. On a planning policy basis the council considers that national planning policy, the London Plan and Brent's current Local Plan policy DMP 7 "Brent's Heritage Assets" provide sufficient support and clarity in the determination of applications that have the potential to impact on heritage assets.
- 6.5.2** The council is preparing an Historic Environment Place-Making Strategy which will enable a programme of review of heritage assets within the borough. The Strategy is not just an exercise in listing known buildings and areas, but attempts to provide an understanding of their value to society (their significance), their physical conservation status, the contribution of their settings, scope for enhancement and their potential to contribute to the delivery of other sustainable development and place making objectives. The Strategy looks at Brent's Listed Buildings, Heritage at Risk, Historic Parks and Landscapes and Archaeology. In particular, it reviews conservation areas and considers whether their boundaries are correct. In some cases there may be justification for extension or potential de-designation. In addition, there are some areas in the borough considered likely to be of sufficient merit to warrant conservation area status.
- 6.5.3** For some areas there is a need to provide greater advice within the associated conservation area design guides. This will be related to the types of development that are popular in the area that might currently be refused that, with amendment consistent with the character of the conservation area, might be viewed acceptable. The Local List has partly been updated and includes a better description of assets included on it. This will allow a better understanding of the architectural/ historic elements that need to be taken account of in any development proposal.
- 6.5.4** Whilst not yet a listed building due to its age, the National Stadium Wembley is of national cultural significance. Recognising its importance, views to it have been protected in current planning policy and this will continue. Although the prospect of its sale has receded for now, a potential for change in ownership of the stadium brings both opportunities and risks. Protecting the stadium's

status as a premium location for football in particular but also other significant cultural events is necessary. As it grows older it will face increased competition from newer purpose built stadia in England and also abroad.

- 6.5.5** Brent has for some time been an area which has been subject to extensive levels of in-migration from different waves of ethnic groups. This role is embraced and seen by residents, the majority of whom are from minority ethnic backgrounds, as a positive thing. In addition to heritage assets, the diversity of Brent's population obviously creates a rich cultural environment; a key element of its recognition as London Borough of Culture 2020. This cultural wealth has been reflected spatially in some of its buildings, uses and places, e.g. creation of places for worship which more recently has been for ornate temples or mosques, Irish pubs and music venues from the 1950s in areas such as Kilburn and Wembley and reggae in Harlesden from the 1960s. Much however is more spontaneous and occurs on a day to day basis in everyday, in homes, streets and schools rather than special places. As such dedicated cultural facilities are comparatively rare in Brent.
- 6.5.6** Continual changes in the ethnic composition of the population can present pressures around continued use/ viability of some cultural institutions. This is compounded by high values of land and buildings, especially as a result of competition/ potential for residential development. The commercial pressure in particular can make it difficult for new cultural facilities or associated creative industries/ types to be established. Historically these have often have relied on colonising buildings or areas neglected by the. This is limiting the potential cultural expression and wider social value that Brent's diverse population can bring. The council has been successful in negotiating affordable/ creative workspace in association with new developments, such as in Alperton and Wembley Growth Areas.
- 6.5.7** The London Plan through policy HC6 Supporting the Night Time Economy seeks to maintain and improve its status, particularly across a number of important centres in London. Brent's night time economy has a symbiotic relationship with cultural industries, both supporting and being reliant upon them. The London Plan identifies the night time economy of Wembley of National/ International Importance and Kilburn High Road, Cricklewood and Wembley Park as of more than local importance. The council is working on a night time economy strategy for Kilburn High Road. This is in recognition of its wider importance historically as a destination for and concentration of

a music/ entertainment industry cluster. It is also in order to seek to stop and ideally reverse its more obvious recent decline. This is also in addition to but complementary to the town centre strategy/ action plan for the centre. Each of the other locations are also priority town centres which will have supporting action plans.

- 6.5.8** In relation to cultural facilities, pubs long recognised as community and cultural hubs have been in severe decline over the last two decades in particular. Brent has been no different in this respect to London. If anything, the ethnic diversity of the borough may well have been a more significant contributing factor, particularly away from high streets/ retail parades. In recognition of the adverse impact and also to protect pubs from being displaced by more valuable uses such as housing, the Brent Local Plan contains policy DMP21 Public Houses. The draft London Plan contains a policy HC7 Protecting Public Houses.

## WHERE DO WE WANT TO BE?

- 6.5.9** In terms of heritage and cultural assets, the council wants to continue to encourage listed buildings and other designated and non-designated heritage assets to be valued in the development process. Heritage and cultural assets can have great value in creating local distinctiveness and a sense of place. For heritage assets, as a minimum the council seeks to ensure new uses, extensions or new build preserves them or their setting and ideally enhances it. The same should be applied to cultural assets, the most prominent example of which is the national stadium. There are already protected views of the stadium from shorter and longer distances which new development has had to take account of to ensure that the important views are not compromised. The council will seek to continue to protect these views. It will also seek to protect and enhance the architectural integrity of the stadium to ensure like other significant cultural assets, e.g. Royal Festival Hall, it will retain its functional relevance as a viable facility, but that any changes undertaken do not compromise its architectural purity.
- 6.5.10** In relation to the future of the national stadium the council wants to continue its role as the preeminent location for football in England. It also recognises that internationally the stadium will increasingly be competing with newer stadia for events. As happened with the old stadium, it will



need to adapt over time to meet changing needs. A different owner may also be more likely to pursue the option of more, larger scale capacity events than is currently allowed. As the temporary arrangement with Tottenham Hotspur showed, the council will consider and be supportive of change where it can be certain that this will bring benefits that outweigh adverse impact. In moving forward it wants to strike a balance to retain the premier facility status. This will ensure that the venue's policy should not restrict change to such an extent that its comparative attractiveness for event organisers/ users is undermined. This will however only be where mitigation measures put in place can show that impacts do not cause significant harm.

**6.5.11** London Plan policy HC5 Supporting Culture and Creative Industries provides a sound overall basis on which to determine planning applications for the creation or loss of cultural facilities. It encourages boroughs to identify Creative Enterprise Zones, which was a Mayor initiative with associated funding. Brent bid for Willesden Green to be a Creative Enterprise Zone but was not successful. It is not clear if the Cultural Enterprise Zone initiative will continue. If it does the council may well seek to identify other areas where there is potential.

**6.5.12** As indicated there is a specific action plan for the night time economy in Kilburn, whilst the other important night time economy areas are supported as part of town centre action plans. It is considered that these in association with a policy in the Brent Local Plan which supports the retention of and promotion of new night time economy uses in these centres should be sufficient.

**6.5.13** In relation to pubs, from a planning policy perspective the existing Brent policy appears to be working well. Whilst there is a draft London Plan which contains a policy that seeks to protect public houses, it is not considered to be as detailed and therefore as robust as Brent's, so it is proposed to take Brent's existing policy forward in its current form.

The council seeks to take forward the existing DMP7 Brent's Heritage Assets as is whilst amending the policy reference.

## POLICY ~~BHC1: DMP-7~~ BRENT'S HERITAGE ASSETS

**Proposals for or affecting heritage assets should:**

- a) demonstrate a clear understanding of the archaeological, architectural or historic significance and its wider context;**
- b) provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the development on the heritage asset and its context as well as any public benefit;**
- c) retain buildings, structures, architectural features, hard landscaping and spaces and archaeological remains, where their loss would cause harm;**
- d) sustain and enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the streetscene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating;**
- e) contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation;**
- f) where demolition is proposed within a conservation area detailed plans for any replacement building will be required to allow consideration of whether the replacement would contribute positively to the character or will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures appearance of the area. In cases where demolition is permitted conditions and/or legal agreements will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures.**

## ALTERNATIVE POLICY CONSIDERED

**6.5.14 No policy, rely on the London Plan policy.** This is not appropriate as it would not give sufficient clarity on how development impacting on heritage assets will be assessed by the council, nor be consistent with the statutory requirement to preserve or enhance nationally recognised heritage assets.

## JUSTIFICATION

**6.5.15** Brent's heritage assets make a substantial contribution to the borough's local character and distinctiveness. They are a unique and irreplaceable resource which justifies protection, conservation and enhancement in a manner

appropriate to their significance. The council recognises and identifies both designated and non-designated assets through the plan making or planning application process. It is acknowledged that they hold value to society at many levels and identification allows protection and consideration in planning decisions.

- 6.5.16** Brent's statutory listed buildings, conservation areas and registered parks and gardens are all designated heritage assets. Brent's Local List, areas of distinctive residential character, sites of archaeological importance and archaeological priority areas are non-designated heritage assets identified as having a degree of significance meriting consideration in planning decision stage. Guidance on Brent's heritage assets, as set out below, is available at [www.brent.gov.uk/conservation](http://www.brent.gov.uk/conservation) and will be a material consideration in the determination of applications for development. Applicants should refer to it early on to ensure that their proposals are based on an understanding of the significance of heritage assets that may be affected.
- 6.5.17** The areas of distinctive residential character are places which the council has identified as having the potential for conservation area status. It will seek to ensure that their character is not diminished prior to the necessary statutory processes being undertaken. This process will be prioritised as set out in the Historic Environment Place-Making Strategy.
- 6.5.18** The purpose of this policy is to provide greater clarity on the specific additional requirements applicable in Brent taking account of existing NPPF, NPPG London Plan, Brent Local Plan policies and local evidence base.
- 6.5.19** Brent's heritage assets include a wide range of architectural styles from Victorian Italianate, Gothic Revival, suburban 'Arts and Crafts', 'Tudorbethan', 'Old World', Modern and Brutalist as well as planned 'village' settlements. Furthermore, its formal public gardens, cemeteries together with the trees and gardens in the 20th century residential developments have matured contributing to setting. Its archaeological discoveries are scarce; sites have been built over and there are limited places where archaeologists could investigate. Records suggest existence of settlements from prehistoric times meaning new discoveries would be significant partly because so little is known.
- 6.5.20** Heritage assets are valued by the public as established and tangible evidence of the last culture, providing a sense of permanence and belonging. Once lost or detrimentally altered, heritage assets cannot easily be reinstated.

It is important that the most valuable are not needlessly or inadvertently destroyed. Policy BD1 therefore, specifically seeks to protect Brent's heritage. It ensures that the case for conservation and enhancement is fully considered when assessing all proposals for development. It also seeks to safeguard the potential for further investigation on sites and buildings where the heritage asset's significance may be previously undiscovered. Archaeological Priority Areas and Archaeological Sites indicate where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. However, sites of archaeological importance could be discovered elsewhere in the borough.

- 6.5.21** The council supports and recognises that change is necessary, but needs to not compromise heritage significance and exploit opportunities for enhancement. Any proposal must have special regard to the desirability of preserving a heritage asset or its setting or any features of special archaeological, architectural or historic interest. When granting consent, special regard will be given to matters of detailed design, especially within main frontages, prominent elevations and roofs, and to the nature, quality and type of materials proposed to be used. Even small scale development proposals, including extensions, roof extensions, dormers and outbuildings and potentially the most minor changes or incremental alterations (such as window replacement and the loss of original fittings) will be unacceptable if overly dominating or otherwise causing harm to character, integrity or appearance.
- 6.5.22** Special regard will be given to proposals near or affecting heritage assets identified as at risk on Historic England's Heritage at Risk Register. The council will use its development management and other planning powers to secure the future viable use of the borough's heritage assets. For archaeological assets, the layout of the development, extent of basements and design of foundations may need to provide for physical preservation. If significant archaeological remains are not to be preserved in-situ then appropriate investigation, analysis, publication and archiving will be required.
- 6.5.23** When considering any planning application (including demolition) that affects a conservation area the council will require the retention of all buildings and structures which make a positive contribution to its significance. Similarly new proposals must pay special attention to the desirability of conserving or enhancing the character and appearance of that area. This can be achieved either by a positive contribution or by development which leaves character



and appearance unharmed, that is to say conserved. Development located within, adjacent to, or otherwise affecting the setting of a conservation area, will be permitted where the visual and functional impact of the proposals can be demonstrated to conserve or enhance:

- a) **the distinctive characteristics of the area, including important views into and out of the area**
- b) **the general design and layout of the area, including the relationship between its buildings, structures, trees and characteristic open spaces; and**
- c) **the character and setting of the buildings and other elements which make a positive contribution to the appearance and special character of the area. Development involving demolition in a conservation area will only be supported if a befittingly-designed replacement has been granted planning permission with appropriate mitigation measures in place to ensure the replacement is constructed.**
- d) **The council will also require the identification of non-designated heritage assets, including building or structures contained on the Local List, archaeological priority areas, areas of distinctive residential character, sites of archaeological importance and sites contained within the London Parks and Gardens Trust's Inventory of Historic Spaces at the beginning of the design process for any development, especially where this may impact on their significance.**

**6.5.24** The council will resist significant harm to or loss of heritage assets. It will assess proposals which would directly or indirectly impact on heritage assets in the light of their significance and the degree of harm or loss which would be caused. Where the harm would be less than substantial, it will be weighed against any public benefits of the proposal, including securing optimum viable use of the heritage asset and whether it would enhance or better reveal the significance of the conservation area. For demolition or alteration to be approved, there will need to be clarity about what will be put in its place within a suitable time frame. It should be noted designation as a Locally Listed Building does not provide further statutory protection but it draws attention to the special qualities of the building.

## APPLICATION REQUIREMENTS

**6.5.25** Outline planning applications are not acceptable in conservation areas as full details of the proposed development are required to make a decision.

**6.5.26** A Heritage Statement is required where a proposal is for or affects a heritage asset. It must describe and demonstrate a clear understanding of the significance of any heritage assets affected by proposals and the impact on their significance, including any contribution from their setting. The level of detail must reflect the importance of the asset and clearly identify the potential impact of the proposal. Where development is proposed for a site which includes or has the potential to include heritage assets with archaeological interest, developers must submit an appropriate desk-based assessment and, where necessary, a field evaluation.

#### LONDON PLAN

Policy HC1 Heritage Conservation and Growth

#### BRENT GUIDANCE

Conservation Area Assessments and Design Guides

Brent Local List

The policy on the national stadium Wembley seeks to take forward an amended version of the existing policy WEM 6 Protection of Stadium Views policy. Any changes to policy are highlighted in ~~strike through~~ for deletions and underline for additions.

#### POLICY: ~~WEM 6 PROTECTION OF STADIUM VIEWS~~ BHC2 NATIONAL STADIUM WEMBLEY

**Regard should be had to the impact of development on the following views (shown on Maps 4.5 and 4.6) of the National Stadium: Development must not be to the detriment of the following views as shown on the Policies Map of the National Stadium Wembley:**

1. Barn Hill, Wembley
2. Elmwood Park, Sudbury
3. Horsenden Hill, Perivale
4. One Tree Hill, Alperton
5. Welsh Harp Reservoir
6. Wembley Park Station
7. The Bobby Moore Bridge

8. Olympic Way North of Fulton Road
9. Chalkhill Park, Wembley
10. Metropolitan and Jubilee Line north of Neasden Station
11. Great Central Way
12. South Way at the River Brent Bridge
13. The White Horse Bridge
14. Neasden Station, Neasden Lane
15. North Circular Road/ Harrow Road junction
16. West Coast Mainline Stonebridge
17. Abbey Road/Grand Union Canal Park Royal

**Proposals that contribute to the national stadium's continued success as a world renowned location for sport and cultural events will be supported.**

**Proposals which increase the frequency and volume of use of the national stadium beyond existing consents will be required to mitigate potential adverse effects to acceptable levels.**

**Proposals that adversely impact on the national stadium's ability to be the premier nationally recognised location for England's national football teams and any world, European, national, association, league or non-league football finals or games of similar significance will be refused.**

**Development must preserve and enhance the architectural integrity of the national stadium.**

#### ALTERNATIVE POLICY CONSIDERED

**6.5.27 No policy.** This is not appropriate for a number of reasons. It could potentially result in the integrity of local and wider views of the stadium, which to date development decisions have sought to protect, being compromised. Notwithstanding other controls that are likely to exist with any sale, other owners may seek to widen the scope and intensity of use of the stadium, for instance attracting a wider range of sports or events. There is a risk such activities may become more of a priority than football.



Given the stadium's impact on and importance to Brent, the council will want to have a meaningful part in any decision that impacts on its iconic footballing status. The need for the stadium to adapt to continue to be a premier location for significant events may also over time lead to continued minor or even significant changes which otherwise might undermine its original architectural integrity. The control on maximum capacity events limits potential adverse impacts on the local community. The council will need to ensure that where additional dates are proposed that these have adequate safeguards in relation to potential local social, economic and environmental adverse impacts.

**6.5.28** Reduction or increase in number of identified views. A fundamental review of the views was undertaken to support the Wembley Area Action Plan in the Tall Buildings in Wembley Study July 2012, which removed some and added others. Given that to date development decisions have sought to protect the views being compromised to any significant degree it is considered that the existing protected views are still appropriate. The majority of buildings in the vicinity of the stadium will rise no higher than its shoulder height allowing views of the roof and most of the arch. Most local views take advantage of movement corridors which have an almost direct route to the stadium. As such the majority of these are unlikely to be compromised if the height and massing of proposed development is sensitive to the view. One view (number 10) Metropolitan and Jubilee Line north of Neasden Station to the east of the stadium however will need particularly close management as even a very modest height building or structure in the foreground on either side of Hannah Close without careful placement could significantly compromise the view from the Jubilee/ Metropolitan line. An additional view from the West Coast Mainline was formerly identified in the UDP but taken out for WAAP. A view from the line is being reinstated due to the importance that it plays in identifying the stadium to those entering and leaving London.

**6.5.29** Greater restriction, or less control on activities or development of the stadium. This is not considered appropriate. Protecting the stadium's status as a premium location for football in particular but also other significant cultural events, particularly as it grows older and faces increased competition from newer purpose built stadia in England and also abroad is necessary. As such policy should be flexible enough to allow change ensuring that no unacceptable harm is done, but does not restrict change to such an extent

that the stadium's comparative attractiveness for event organisers/ users is undermined such that its status is severely compromised or diminished.

## JUSTIFICATION

**6.5.30** The London Plan Policy H3 Strategic and Local Views requires local plans to clearly identify important local views. It advises boroughs to use the principles of HC4 London View Management Framework for the management of local views.

**6.5.31** The national stadium Wembley is an iconic building of national cultural significance, pride and international renown, principally for football. The stadium's size and height, in particular that of its impressive white lattice arch, combined with its elevated position mean that it is very prominent from numerous points locally. It is also visible from much of London. Since the start of its construction the council has sought to protect more immediate and wider views to it from across the borough on account of its wider cultural significance, function as a landmark/ reference point and the role that clear views to it play as part of the whole experience of excitement and anticipation of people attending an event.

**6.5.32** London Plan policies and associated Supplementary Planning Guidance set out the key principles and methodology for information that needs to be supplied to support development proposed which could impact on views and the key considerations in determining whether it is acceptable.

**6.5.33** The cost of the stadium to construct and operate together with its initial design attributes to accommodate a wide range of sporting and cultural events has meant that it was always anticipated that it would be used for more than just nationally and internationally important football games. Notwithstanding this, the funding of the stadium and associated agreements together with the Football Association's role as owner/ occupier and national custodian of the game meant that football would be given prominence over other uses. Any different ownership of the stadium potentially raises issues around football's priority, in terms of number and stature of games accommodated, the range of other events sought, desire to increase higher capacity attendances and the need for the stadium to adapt for new sports. In addition the older the stadium gets, there is an increasing potential for it to need to change to retain its competitiveness against other stadia or cultural venues.

**6.5.34** The policy seeks to protect the preeminent position of the stadium at a global



level as a renowned location for sport and cultural events, but ensure that its status in particular in relation to football in England is not diminished. The owner/ custodian of the stadium needs to be supported to ensure the on-going commercial success which allows continued investment in the facility. The council recognises the benefit that the stadium brings overall to the residents and businesses of Brent, and its role in raising the profile of Wembley across the world. Nevertheless, Brent's population and number of businesses is growing, particularly in the vicinity of the stadium. To protect them, conditions were placed on the rebuilt stadium's original planning permission which limited the number of events annually with an attendance of over 50,835 to 37 (22 sports and 15 non-sports). The council supports the 'agent of change' principle and has ensured that development in the vicinity of the stadium pays suitable regard to its operation. Nevertheless, the cap on high capacity events was in place for good reasons and the council will when required use this control to ensure that there are no unacceptably adverse impacts from changes to the stadium's types of activities, their frequency or duration.

**6.5.35** In addition to protecting the views to the stadium, the policy also seeks to protect and enhance the architectural integrity of Sir Norman Foster's design. This will be from the impact of both small and large scale proposals taking account of the potential for adverse cumulative change over time.

#### LONDON PLAN

Policy H3 Strategic and Local Views

Policy H4 London View Management Framework

London View Management Framework Supplementary Planning Guidance

### POLICY BHC3: SUPPORTING BRENT'S CULTURE AND CREATIVE INDUSTRIES

**Working with others the council will through all its activities and affordable workspace and town centre action plans ensure that creative industries are supported through the development of improved and additional creative workspaces, cultural facilities and other mutually complementary uses.**

**Existing clusters of creative workspaces in Harlesden, Kilburn, Willesden Green, Queen's Park and Wembley will be protected and promoted.**

## ALTERNATIVE POLICY CONSIDERED

**6.5.36 No policy.** This is not appropriate as it is sought in the London Plan.

**6.5.37 To provide a more detailed policy that sets out specific criteria against which applications will be assessed.** This is not considered appropriate as it is unlikely to reflect the dynamism associated with the enterprise zone concept, plus cannot reflect the differing characteristics and specialisms individual zones might focus on.

## JUSTIFICATION

**6.5.38** The council consistent with the Mayor's policy on creative enterprise zones seeks to build on the work of the area's current creatives and cultural facilities to promote better opportunities for such activities to thrive. This will support educational, economic and cultural enrichment, but also add to the vibrancy, sense of place, and relevance of the area in people's lives as part of the rich tapestry of positive experiences associated with the diversity within Brent and London.

**6.5.39** Consistent with London Plan policy H5 criterion c) the council will support such areas through allowing development that furthers the provision of temporary and permanent creative workspace, related ancillary or complementary facilities and uses and cultural venues which support the objectives and action plans for the zone. The areas of Alperton, Harlesden, Kilburn, Queen's Park, Wembley and Willesden Green are those where existing or creative industries are congregated or where the Brent Workspace Study indicates there is likely to be strong demand. As such the council will through its employment policies, town centre action plans and also its affordable workspace strategy seek to support the retention of and provision of more creative industries' space.

### LONDON PLAN

Policy H5: Supporting London's Culture and Creative Industries

### LOCAL PLAN

Brent Policy BE1 Economic Growth and Employment Opportunities for All

Brent Affordable Workspace Strategy

Brent Town Centre Action Plans

## POLICY: BHC4 BRENT'S NIGHT TIME ECONOMY

**The London Plan identifies the Night Time Economy of Wembley of National/ International Importance and Kilburn High Road, Cricklewood and Wembley Park as of more than local importance.**

**The council through its own actions and working with others will support Brent's night time economy and in particular the four centres which will be the priority locations for such uses. Development that preserves or enhances existing night time economy activities or creates new ones that will reinforce the role and significance of each centre in the London hierarchy in an inclusive and accessible way will be supported, whilst that which would undermine it will be refused.**

## ALTERNATIVE POLICY CONSIDERED

**6.5.40 No policy.** This is not appropriate as it would not be regarded as being in general conformity with the London Plan.

**6.5.41 To identify a wider range of centres to prioritise for the night time economy.** This is not considered appropriate as it has the potential to undermine the existing critical mass of the existing centres as priority locations by diverting existing and potential occupants/ investment away from them.

## JUSTIFICATION

**6.5.42** The centres of Wembley, Kilburn High Road, Cricklewood and Wembley Park are all identified as being of more than local importance for the night time economy by the London Plan. In the case of Wembley this is of national/ international importance, principally as a result of the National Stadium and SSE Arena, although Boxpark will also be a significant draw for its mixture of food, drink and entertainment. These venues and the concentration of large hotels provide significant patronage for the extensive food and drink offer at Wembley Park. Cricklewood has a wide range of eating and drinking establishments, the same is true of Kilburn High Road which is home of the Kiln Theatre and also recognised for its live music/ comedy venues usually associated with public houses.

**6.5.43** The council recognises the function that these centres play and that ensuring a successful night time economy covers a multiplicity of council functions

as well as many other public agencies, the private sector and other groups. Each area is subject to a council town centre action plan which will address the night time economy. Kilburn has been prioritised through a night time economy action plan due to its recent history of loss of music venues. London Plan Policy HC6 Supporting the Night Time Economy provides greater detail on key considerations for planning decisions.

**6.5.44** It is important that night time economy activities and venues are fully inclusive and accessible to support Brent and London's diversity as set out in the Mayor's Culture and the Night Time Economy Supplementary Planning Guidance. It is also important that impacts on local amenity are assessed in accordance with other policies in the London Plan and Local Plan.

#### LONDON PLAN

HC6 Supporting the Night Time Economy

#### BRENT

Kilburn High Road Night Time Economy Action Plan

Wembley Town Centre Action Plan

Kilburn High Road Town Centre Action Plan

Cricklewood Town Centre Action Plan

The council seeks to take forward the existing DMP21 Public Houses as is. There is no main modification to the policy only an update of a paragraph reference number. Any changes to policy are highlighted in ~~strike through~~ for deletions and underline for additions.

## POLICY: ~~DMP-21~~ BHC5 PUBLIC HOUSES

### THE COUNCIL WILL SUPPORT THE LOSS OF PUBLIC HOUSES ONLY WHERE:

- a) **its continued use as a pub or as an alternative community facility within the D1 use class is not economically viable as demonstrated by meeting the marketing requirements as set out in paragraph 6.5.48 ~~11.9~~;**
- b) **the proposed alternative use will not detrimentally affect the character and vitality of the area and will retain as much of the building's defining external fabric and appearance as a pub as possible;**
- c) **the proposal does not constitute the loss of a service of particular value to the local community; and**
- d) **if registered as an Asset of Community Value the premises can be shown to have been offered for sale to local community groups and no credible offer has been received from such a group at a price that is reflective of the condition of the building and its future use as a public house. The Council will treat registration as an Asset of Community Value as a material planning consideration.**

## ALTERNATIVE POLICY CONSIDERED

**6.5.45 No policy.** This is not appropriate. Although the London Plan has a pub protection policy, the council considers that its adopted policy better meets local priorities for protection of pubs and if lost their likely prioritisation for community use and retention of physical features that indicate the former use of the building as a pub.

**6.5.46 To provide more criteria for assessment.** This is not considered appropriate as the policy has been used by the council for over 2 years and covers the most pertinent issues.

## JUSTIFICATION

**6.5.47** In recent times Brent has seen an increase in conversion of public houses to other uses. This is of concern to the council as public houses can make a valuable contribution to the community by adding character to the area and providing employment and a place for social interaction. Many public houses provide space for evening classes, clubs, meetings or performances. As such, and in keeping with the NPPF, public houses are classed as social

infrastructure and proposals which would result in their loss will be subject to this policy. This supplements the London Plan policy HC7 Protecting Public Houses. In addition, due to the contribution public houses make to the borough's local character and distinctiveness, policy BHC1 Brent's Heritage Assets will normally apply.

- 6.5.48** Where applications for a change of use or redevelopment of a public house are received, to make an assessment against criteria in policy BHC5, the council will require evidence that:
- a) the public house has been marketed for 24 months as a public house and for an alternative local community facility, at a price agreed with the council following an independent professional valuation (paid for by the developer) and there has been no interest in either the free-or lease-hold either as a public house or as a community facility falling within 'D1' use class;**
  - b) the public house has been offered for sale locally, and in the region, in appropriate publications and through specialised licensed trade agents;**
  - c) all reasonable efforts have been made to preserve the facility, including all diversification options explored – and evidence supplied to illustrate this;**
  - d) the CAMRA Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes demonstrate that the public house is no longer economically viable;**
  - e) there has been public consultation to ascertain the value of the public house to the local community;**
  - f) an assessment has been made of alternative licensed premises within easy walking distance of the public house; and whether such alternative premises offer similar facilities and a similar community environment to the public house which is the subject of the application.**

LONDON PLAN

Policy HC7 Protecting Public Houses

BRENT

Policy BHC1 Brent's Heritage Assets



## 6.6 GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT



## GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT

### WHERE ARE WE?

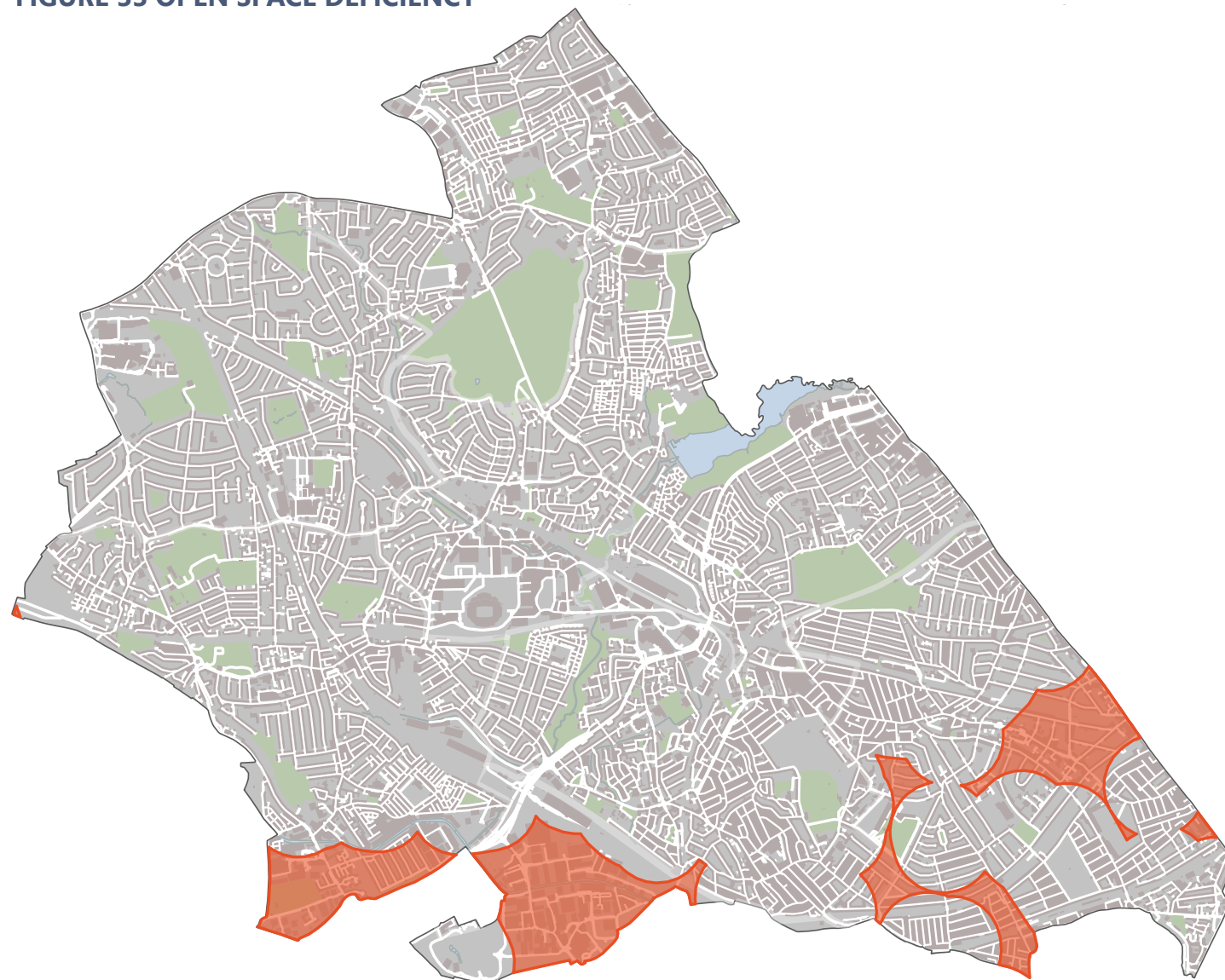
**6.6.1** There are 637 hectares of green space and approximately 42 hectares of water space within the borough. This provision takes a range of forms, which includes public parks, canals, rivers, allotments, sites of interest for nature conservation, local nature reserves and cemeteries. In comparison to other areas of London, the borough has a lower percentage of green space.

### PUBLIC PARKS AND OPEN SPACES

**6.6.2** Brent currently has 101 public parks, which are of various sizes and typologies. This type of green space provision covers 463 hectares, equivalent to 1.39 hectares per 1,000 population. If the current level of provision per person were to be maintained, an additional 86.4 hectares of public parks would be required to 2041.

**6.6.3** Since the previous Local Plan, progress has been made in improving open space accessibility. Figure 33 however demonstrates, there are still areas not within 400m of any public park. When each different public park typology<sup>20</sup> is looked at individually, significant variations in distribution occur. In particular, there are limited amounts of pocket parks within the west and no provision of either district or metropolitan parks to the south.

**FIGURE 33 OPEN SPACE DEFICIENCY**



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<sup>20</sup> Typologies of public park provision have been defined using the London Plan Public Open Space Categorisation

- 6.6.4** At a ward level variations in public park provision are significant; ranging from 0.046 to 6.54 hectares per 1,000 population. Overall, the majority of wards fall below the borough average. Only 6 wards have equivalent or higher provision.
- 6.6.5** The quality of public parks and open spaces varies significantly. The Council's Qualitative Assessment found that this can be attributable to a number of factors, such as presence of litter, quality of infrastructure and equipment and perception of safety.

## URBAN GREENING FACTOR

- 6.6.6** London Plan policy G5 sets minimum standards of green infrastructure provision within developments, through an 'urban greening factor'. The main form of urban greening within major residential developments is open space/ landscaping and green roofs. Green walls within the borough to date are limited in number.

## TREES

- 6.6.7** The borough's tree stock contains a wide variety of tree species of different age-classes. Locations include public parks, woodlands, streets/ public realm, Sites of Importance for Nature Conservation, gardens and landscaping in developments. The 18,000 street trees form a significant proportion of the tree stock. Where possible, opportunities to increase the amount of streets trees are pursued. In 2016/17 223 street trees were planted. Approximately 300 tree preservation orders (TPOs) protect a range of single or multiple trees.

## SITES OF SPECIAL SCIENTIFIC INTEREST AND SITES OF IMPORTANCE FOR NATURE CONSERVATION

- 6.6.8** Brent has no nature conservation sites of international importance. At a national level the Brent Reservoir is a Site of Special Scientific Interest (SSSI). It is 69 hectares and in a favourable condition.
- 6.6.9** There are 62 Sites of Importance for Nature Conservation, covering a range of habitats, for example woodlands and hedgerows, grasslands, wetland and rail side. A recent review found that their quality varied from poor structure and species diversity to species-rich and structurally diverse. Invasive species such as Japanese knotweed exist on a number of sites, for example, the Brent River Park and railway tracksides.

## BLUE RIBBON NETWORK AND WATER QUALITY

- 6.6.10** Brent's existing blue infrastructure or Blue Ribbon Network, includes the River Brent, Grand Union Canal and Welsh Harp, Wealdstone Brook, Brent Feeder Canal and Dollis Brook. Water quality is of 'moderate' status in all waterbodies. This is as a result of pollution and physical modification from development, transport and the water industry. The '*Brent River Corridor Improvement Plan*' seeks to ensure that rivers are of a 'good' status to support wildlife.

## WHERE DO WE WANT TO BE?

- 6.6.11** To support a growing population, a high quality and multi-functional green infrastructure network will be achieved. This will seek to maximise its recreational and environmental value. This will be through protecting and, where the opportunities arise, enhancing green infrastructure quality and accessibility. Trees will play an important part of this. New green infrastructure will be created within the Growth Areas. Consistent with London Plan policy G5 Urban Greening all major development will be expected to have a minimum amount of green infrastructure. The targets are challenging but attainable. Where feasible, new major developments will create high quality publically accessible space. These measures will: add to local character and distinctiveness; improve physical and mental wellbeing; contribute towards reducing the impacts of climate change; and attract investment.

### LONDON PLAN

- Policy G1 Green Infrastructure
- Policy G3 Metropolitan Open Land
- Policy G4 Open Space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and Access to Nature
- Policy G7 Trees and Woodlands
- Policy G8 Food Growing
- Policy G9 Geodiversity
- Evidence base
- Brent Open Space Study
- Natural Capital Account for Brent
- Brent Biodiversity Action Plan



## POLICY BGI1 GREEN AND BLUE INFRASTRUCTURE IN BRENT

The council will expect major developments, particularly those within areas of open space deficiency, to:

- a) incorporate publically accessible open space. The amount of open space to be provided should be derived from the standards identified within the Council's 'Open Space, Sport and Recreation Study';
- b) provide a financial contribution to improving the quality and/or accessibility of existing open space provision where it is accepted that publically accessible open space cannot be provided on-site; and
- c) consider provision of 'meanwhile uses', such as pocket parks and community gardens on parts of sites that are likely to be otherwise vacant for long periods.

For all developments:

- d) open space should meet all of the following criteria:
  - i. be appropriately designed to be accessible, safe, usable and integrated into the development site;
  - ii. enhance biodiversity and where adjacent to, integrated into existing green and blue infrastructure network; and
  - iii. include a suitable long-term management plan
- e) adjacent to the Blue Ribbon Network development is required to improve access to the waterway, enhance its setting and provide an appropriate landscaped set-back which may include public open space
- f) on or near the Capital Ring (as shown on the Policies Map) development is required to take full account of the need to protect its character, and where appropriate, contribute towards its improvement
- g) not achieve a net loss in biodiversity or detrimental impact on the geodiversity of an area
- h) in meeting the urban greening factor place emphasis on solutions that support biodiversity
- i) adjacent to green chains development should not undermine its biodiversity and seek to establish a connection to it
- j) adjacent to the Blue Ribbon Network and other tributaries, or waterways, or which has the potential to negatively impact on its water quality, development will be required to contribute towards restoration and naturalisation of waterways, and seek to enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive and Thames River Basin Management Plan

## ALTERNATIVE POLICY APPROACHES

- 6.6.12 **Rely on London Plan Policy.** This is not considered to be appropriate as it is not locally specific enough taking into account Brent priorities.
- 6.6.13 **Developing poorer quality spaces to fund improvements to other green spaces.** This is not considered to be appropriate as there were no significant spaces of such poor quality identified in the Open Space Assessment that warranted disposal and neither was there a surplus of open space overall.
- 6.6.14 **Not require additional open space provision on major development sites or within Growth Areas.** This is not considered to be appropriate as it will limit the council's opportunities to provide additional open space, which is needed to support the borough's current and future population.

## JUSTIFICATION

- 6.6.15 The borough's urban nature, limited land availability and significant population growth means that the protection and enhancement of existing green and blue infrastructure is of great importance. This will ensure its benefits are maximised for both current and future residents and visitors. The management of development proposals will play an important part in achieving these outcomes.
- 6.6.16 London Plan policy G11 Green Infrastructure sets out key objectives for development and development plans to do this. Nevertheless, in the context of the size of existing provision actions by the council and other parties such as homeowners/ occupiers will probably also have more significant influence on outcomes. Taking a comprehensive approach to green infrastructure across its services and actions is therefore important for the council in improving outcomes. Adopting a Green Grid Framework will enable it to ensure that existing blue and green spaces are better connected to communities, and their quality and function are maximised. The Framework will also support the creation of new open spaces strengthening their links. More details on the Council's Green Grid Network will be set out in the Brent Green Infrastructure Strategy.
- 6.6.17 Brent's existing significant areas of green infrastructure are shown on the policies map. London Plan Policy G3 gives Metropolitan Open Land (MOL), such as Northwick Park and Fryent Country Park, the same level of protection as the Green Belt. Essential ancillary facilities will only be acceptable on MOL where they maintain its openness. The NPPF and London Plan Policy G4 seek

to protect existing open space, sports and recreational buildings and land, including playing fields from development. Exceptions to this are where it can be clearly shown to be surplus to requirements, equivalent local provision is made or the development is for alternative sports and recreational provision the need for which outweighs the loss of the current or former use.

- 6.6.18** As required by London Policy G6, the level of protection afforded to SINC sites should be in proportion to their status and contribution towards the region and/or local ecological networks. Welsh Harp, designated as a nationally recognised Site of Special Scientific Interest is afforded a high level of protection through the Wildlife and Countryside Act. The Brent Sites of Importance and Nature Conservation Study (2014) identifies the biodiversity resources present in these sites. It also makes site specific recommendations to enhance their biodiversity. Development with the potential to impact on a SINC will be expected to have regard to the Study and contribute to delivering its recommendations.
- 6.6.19** Brent's green chains and wildlife corridors are linked to more continuous areas of open space. They allow for the movement of plants and animals/insects and may provide an extension of the habitats they join. These routes will be protected from development which would impede movement. In exceptional circumstances it may be appropriate to provide an alternative route, providing it can be robustly demonstrated this will continue to support movement.
- 6.6.20** Limited land availability means that existing ratios of green and blue infrastructure space to population cannot be maintained in line with the growing population. London Plan Policy G5 Urban Greening requires a minimum amount of green and blue infrastructure on major development sites. The council will require the standards as set out in that policy to be met on site. The challenging targets will require its consideration as an integral part of the development, rather than as an after-thought. All development is required to make a positive contribution to biodiversity and contribute to the targets of the Brent and London Biodiversity Action Plan wherever possible. Developments should be designed with an understanding of their wider ecological context. As such the council seeks developers to place a greater emphasis on solutions which have better bio-diversity outcomes where possible when meeting Policy G5 requirements.
- 6.6.21** Barn Hill Open Space, which is located within the boundary of Fryent Country Park has been identified by the London Geodiversity Partnership as being suitable for designation as a Locally Important Geological Site (LIGS). In line with national and regional policy, the council seeks to protect, promote and enhance geodiversity within Brent.
- 6.6.22** The council will place emphasis on designs which reflect and enhance the proposed use of the building or space and the needs of its users, the natural character of the locality and the surrounding buildings and those which best enhance bio-diversity. This will include soft landscaped frontages, boundary treatments and the retention/ reinstatement of features of landscape character.
- 6.6.23** In association with this policy and G4 realistic opportunities for additional public open space will be sought wherever possible on major development sites and also in Growth Areas. New provision will particularly be sought within areas identified as being deficient in open space. Where it is agreed that on-site provision is not feasible, the council will seek enhancements to the existing green and blue infrastructure
- 6.6.24** The council's Food Growing and Allotments Strategy recommended that opportunities for temporary food growing are pursued. Integration of food growing opportunities into new major residential developments will be sought, taking into consideration the demand for provision within the area. Where it is considered appropriate, the council will encourage the creation of new allotment plots on major development sites.
- 6.6.25** On major sites in particular, which may take some time to develop, or even on smaller sites, a meanwhile green infrastructure use will be encouraged and supported. This could include pocket parks, community gardens or other features that promote community engagement with the developer or integration of the development within the surrounding community.
- 6.6.26** In order to meet open space standards, on-site provision will be required. The amount will be consistent with the 'Open Space, Sport and Recreation Study' and other guidance such as 'Shaping Neighbourhoods: Play and Informal Recreation' Supplementary Planning Guidance. A financial contribution towards enhancing the quality and/or accessibility of open spaces will only be accepted where demonstrated that on site open space provision is not feasible. Management and maintenance of new open spaces needs to be considered from the start of the design process.
- 6.6.27** It should not be assumed that the council will automatically adopt such spaces. Indeed there may be merit in terms of ensuring high quality maintenance

for occupiers of developments to be responsible for their management and upkeep. The incorporation of food growing opportunities on site enhances the likelihood of occupier interest in/ ownership of the quality of the space. Any adoption by the council will be subject to its agreement and a suitable commuted sum for on-going maintenance being secured.

**6.6.28** New or replacement open space provision, should be designed in consultation with the council, and will be expected to address the following:

- a) Location and security – easily accessible by non-car means. Contribute to a sense of security by applying the principles of London Plan policy D10 'Safety, security and resilience to emergency'.
- b) Long-term management plan – to ensure the space will be managed in the long-term to ensure its continuation as a well-used high quality space;
- c) Layout and design – usable and practical spaces, well suited for a variety of users. Good linkages and permeability will encourage movement and independent play within the site;
- d) Habitat creation – which assist in achieving Brent Biodiversity Action Plan targets, balancing undistributed habitat zones and areas that people can enjoy and relax in;
- e) Integration – with proposed and existing green routes including green corridors and the All London Green Grid;
- f) Ownership – preferably local community input into the design of the open space to meet needs, promote a sense of ownership, respect, territorial responsibility and community

**6.6.29** The council will explore opportunities to improve accessibility to the existing green and blue infrastructure. The focus will be on the creation of new active travel links to and within the borough's open spaces. Opportunities to enhance, and where applicable, expand existing routes, such as the Capital Ring and Quietways, will be pursued. It is anticipated that development will be a key enabler of improving accessibility to the borough's green and blue infrastructure.

**6.6.30** In developments adjoining the borough's Blue Ribbon Network the council will pursue opportunities to improve public accessibility and its setting, both in relation to buildings and public realm. It should be noted that development adjacent to a main river or its tributaries is required by the Environment Agency to have a minimum set back of 8m. This setback enables ease of general waterway maintenance, helps to create a sense of openness, protecting and offering the opportunity for the enhancement of habitats for



wildlife. It also enables opportunity for sustainable and cost effective flood risk management options. Early engagement with the Environment Agency, where applicable, is advised.

**6.6.31** The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will also need to balance the protection and enhancement of biodiversity and the multiple needs of the users of canal and towpath. In Brent, development adjacent to the Grand Union Canal in particular provides an opportunity to create new towpaths, public open spaces and access points. Early engagement with the Canal and River Trust for schemes adjoining the Grand Union Canal and the Brent Canal Feeder is advised.

**6.6.32** Notwithstanding the need for development to meet the urban greening factor, areas that currently might not have a designated status might well be rich in biodiversity. On these sites developments should avoid a net loss of biodiversity.

**6.6.33** Green chains form an important part of the bio-diversity network. There are gaps in this network across Brent. Where development is adjacent to a green chain it should ideally link into it to extend the potential for movement of flora and fauna.

**6.6.34** The Water Framework Directive is a European Union Directive which commits all member states to achieving a 'good' status' for all water bodies by 2027. Currently, all water bodies within Brent are achieving a 'moderate' status. There are a number of reasons as to why these water bodies are not achieving good status, which includes physical modification as a result of urbanisation, pollution and misconnections. In line with London Plan Policy SI5 and Brent Local Plan BSUI4 development should ensure that it is designed to separate and properly connect foul and surface water outfall and where possible remove existing misconnections.

**6.6.35** In Brent waterside developments and other developments which could negatively impact on water quality, such as those where connecting to a combined sewer is unavoidable, will be expected to mitigate impacts by contributing to the delivery of the emerging Thames River Basin Management Plan. The Plan sets out the following measures to enhance the Brent catchment:

- a) Deculverting and retaining natural structures such as obsolete weirs and banks and bed reinforcements

- b) Bypassing barriers to fish passage, such as weirs improving native aquatic plants and wildlife presence by restoring or creating new and enhanced natural physical and wetland habitats throughout the river corridor.
- c) Control and management, of invasive non-native species.

**6.6.36** Such developments should also contribute to the delivery of the Brent River Corridor Improvement Plan, produced by the Brent Catchment Partnership, Brent Biodiversity Action Plan, and the London Rivers Action Plan. Specific projects in Brent catchment are identified on the interactive map on the River Restoration Centre website.

## POLICY BG12 TREES AND WOODLANDS

**Development with either existing trees on site or adjoining it that could affect trees will require:**

- a) **Submission of a BS5837 or equivalent tree survey detailing all tree(s) that are on, or adjoining the development site;**
- b) **In the case of major development to make provision for the planting and retention of trees on site. Where this is agreed to not be possible, a financial contribution for off-site tree planting will be sought.**
- c) **In the case of minor development which results in the loss of trees provision of appropriate replacements on site.**
- d) **Existing trees on site to be retained or proposed trees to be planted, to accord with the recommendations of BS5837 or equivalent;**
- e) **All agreed works to trees to accord with BS3998:2010 or equivalent.**

## ALTERNATIVE POLICIES CONSIDERED

**6.6.37 No policy.** This is not considered to be appropriate as London Policy encourages a more local approach, requiring development plans to protect 'veteran' trees and ancient woodlands, and identify opportunities for tree planting in strategic locations.

## JUSTIFICATION

**6.6.38** Trees and woodlands are vital components of the borough's landscape and green infrastructure with its associated benefits. Much tree growth is within and beyond the human lifecycle, providing a link to the past, present and future. There are a number of veteran trees, which provide niche habitats.

Ancient trees and ancient woodlands are afforded protection by the NPPF. Brent has other valuable trees, which over time will become 'veteran' or 'ancient' that should be protected. The council is undertaking an on-going review of Tree Preservation Orders. It will prioritise new Orders where trees of significant amenity value are potentially under threat.

- 6.6.39** Consistent with London Plan Policy G7 Trees and Woodlands the council strongly encourages the retention of trees on development sites. If trees are located on or adjacent to a site, applicants should carry out a Tree Survey. The survey will need to accord to the standards set out in BS5837. It should inform the design and layout of the development to ensure the long term retention of as many existing high quality trees as possible. Where it is agreed with the council that the retention of trees is not possible, re-provision should be made on site. Where agreed to not be feasible, a contribution to off-site tree planting will be required. Tree replacements, or the off-site contribution will be of an equivalent Capital Asset Valuation of Amenity Trees (CAVAT) value.
- 6.6.40** The London Plan encourages the 'Right Tree for a Changing Climate' approach. This seeks to ensure that newly planted trees will thrive in the changing climate and assist in coping with the predicted warmer temperatures and the change in weather patterns. Trees should be designed into a development scheme from the outset. They should complement the surrounding local landscape. They need sufficient space to enable them to reach their mature height and spread without causing issues to the integrity of the built structure and its future occupants. BS8545:2014 Trees: from nursery to independence in the landscape should be used when choosing landscaping and devising management plans for trees within developments. The council encourages early engagement to agree the most appropriate species are used for the scheme.
- 6.6.41** The London Plan and the Mayor's Environment Strategy recognise the value that trees bring to the environment and Londoners and seek to increase tree cover by 10% by 2050. To support this target the council will encourage additional diverse species tree planting on development sites and elsewhere. This will mitigate the risks that monoculture and climate change present.
- 6.6.42** Wherever possible, opportunities to increase the borough's tree population will be taken. Gladstone, Barham and Roundwood Parks are of an open and spacious nature. They provide opportunities for the planting of large canopy species. Such trees within these areas will help to create new skyline features

within parks, adding to their character. The council will ensure that the planting at such sites will not be at the expense or loss of other habitats and that new planting works with the existing landscape scheme that is in place. Street tree planting for the most part will focus on smaller trees, consistent with the right tree right place philosophy. This will limit the council's on-going tree management and public realm maintenance costs.

- 6.6.43** The council does not yet have full knowledge of the existing tree stock, and its quantified environmental and economic benefits. Developing it will enable a targeted approach to tree planting
- 6.6.44** The council acknowledges that the loss of a preserved tree, or one which contributes to the character of the area, is occasionally unavoidable. When a situation such as this arises, it will take into consideration BS5837: 2012: Trees in relation to design, demolition and construction.
- 6.6.45** The appropriate management of trees can prolong their lifespan, support their successful establishment and maximise their community and wildlife benefits. BS 3998:2010 Tree Work Recommendations should be used for established trees and overgrown hedges. For newly planted trees on the site, the council will require a management plan which details how they will become an established component of the landscape.
- 6.6.46** As well as trees, mature shrubs and hedges that make a significant contribution to the streetscape should be kept. This will require appropriate space and conditions to allow their long term health to be maintained. Detailed specification for new planting, promoting native species, and including like for like or a higher quality of replacements trees will be sought in support of applications.

## 6.7 SUSTAINABLE INFRASTRUCTURE



## SUSTAINABLE INFRASTRUCTURE

### WHERE ARE WE?

- 6.7.1** The majority of schemes which come forward within Brent adhere to the London Plan and Brent Council sustainability policies. In 2016/17, only nine schemes did not adhere to these policies. These were office to residential conversions allowed through permitted development rights.
- 6.7.2** A private site-wide Combined Heat and Power (CHP) network has been installed in the Wembley Park area. A number of major developments within the Growth Area have also been designed to allow future connection to a district heating network should one become available. Plans for a sustainable energy network within the South Kilburn Growth Area have been forwarded through the review of the South Kilburn masterplan in 2016.
- 6.7.3** On average, major development within Brent has achieved a 31% reduction in CO2 emission on Part L 2006 in 2016/17 and a 36% reduction in 2015/16. The preferred method of providing renewable energy on-site within Brent is through solar photovoltaics (PV). This type of renewable energy technology was found in 38% of all major development in 2016/17 and 67% in 2015/16
- 6.7.4** The majority of Brent is within an Air Quality Management Area (AQMA). Brent meets all national air quality targets except for two pollutants – Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub>). There are currently four Air Quality Focus Areas (AQFA). These are: Neasden Town Centre; Church End; Kilburn Regeneration Area; and Wembley and Tokyngton. The largest contributors to poor air quality are road transport, local energy generation and construction. The impacts can also be made worse by wider issues such as poverty, deprivation and general poor health. At least 200 premature deaths and a further unquantified amount are attributable to poor air quality within Brent.
- 6.7.5** Flooding can have major economic and social impacts on the borough's residents, as well as devastating environmental impacts. Fortunately, over the last twenty years Brent has not experienced major flooding, with the most recent events (2007 and 2010) occurring on the highway, open spaces and gardens. The Policies Map shows areas of the borough that are subject to fluvial and surface water flooding.
- 6.7.6** The majority of the borough is at low risk to fluvial flooding. Areas of Flood

Zone 2 (>0.1% and < 1% annual flooding exceedance) and Flood Zone 3 (Fluvial and Tidal) (> 1% annual flooding exceedance) generally follow the course of the River Brent and its tributaries. Approximately 1,390 properties are potentially at risk of fluvial flooding at least once every 100 years, and 2,000 once every 1,000 years. There are a number of areas within the borough which are at risk to surface water flooding (Flood Zone 3). This occurs as a result of high intensity rainfall, resulting in water ponding or flowing over ground before it enters the underground drainage network or a watercourse. The areas of flood risk tend to be located within the highway. In a much more extreme event (1 in 200 probability occurrence in any given year) approximately 35,500 residential properties and 4,400 non-residential properties could be at risk of surface flooding of greater than 10cm depth.

- 6.7.7** Climate change is one of the key factors which could see an increase in the risk of flooding within Brent. The extent of flooding and its impacts will vary depending on the climate change scenario. Maps showing the varying extents are included within the Joint West London Strategic Flood Risk Assessment SFRA. Brent has 27 critical drainage areas, a number of which cross into other boroughs. Instances of sewer flooding are generally higher in the north of the borough than in the south, with Kenton ward (81 incidences over last 5 years), Northwick Park and the south part of Kilburn ward (both over 41 incidences) being hot spots.
- 6.7.8** Unsurprisingly the increased potential for elevated groundwater within areas follows those adjacent to the course of waterways. Artificial potential sources of flooding include Brent Reservoir, owned and managed by the Canals and Rivers Trust. In the extremely unlikely event of the reservoir failing and releasing its water, impacts would be greatest on properties to the south and west.

### WHERE DO WE WANT TO BE?

- 6.7.9** In terms of carbon reduction/ energy efficiency and construction emissions, the council would aim to ensure all major developments accord with the London Plan's policy objectives meeting renewable energy standards on site. There will be the wider delivery of established district wide CHP systems within the Wembley and South Kilburn Growth Areas. In addition new district heating networks will come forward within Neasden Stations and Northwick Park Growth Areas.
- 6.7.10** The council wants to see improved air quality through a number of measures,

with particular emphasis on reducing pollutants along major thoroughfares such as the North Circular Road and the A5 Edgware Road. The council will aim for all development within identified Growth Areas to be 'Air Quality Positive'. In addition, the development of a high quality green infrastructure network within areas subject to high exposure of poor air quality will be taken forward.

**6.7.11** With regards to flooding, the council will work strategically across catchments with neighbouring boroughs. All major developments are likely to contribute to reducing local flood risk by limiting rainfall run-off to greenfield rates and be outside the floodplain or if this is not possible, incorporating flood resilience to protect to occupiers and property. The council will work with the Environment Agency to deliver the Tokyngton Park flood alleviation scheme.

**6.7.12** Details about flood alleviation schemes, and the delivery of large-scale sustainable infrastructure within the borough is detailed within the council's Infrastructure Delivery Plan.

## POLICY BSUI1 - CREATING A RESILIENT AND EFFICIENT BRENT

**In the Neasden Stations, Northwick Park and Staples Corner Growth Areas the Council will require establishment of new district Combined Heat and Power networks.**

**All major developments within the Neasden Stations, Northwick Park and Staples Corner, Wembley and South Kilburn Growth area shall connect to or contribute towards a decentralised energy system unless it can be demonstrated that such provision is not feasible or the proposed heating system is 100% renewable.**

**All major developments will be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used to enable the development to mitigate and adapt to climate change over its intended lifetime.**

**All major non-residential development to achieve a BREEAM standard of 'Excellent'**

## ALTERNATIVE POLICY CONSIDERED

**6.7.13 Rely on draft London Plan polices (S2, S3 and S4).** This is not considered to be appropriate as this policy will not sufficiently address the local

sustainability issues present within Brent. Furthermore, the London Plan encourages a more local approach to be adopted by local planning authorities.

## LONDON PLAN

Policy SI2 Minimising greenhouse gas emissions

Policy SI3 Energy Infrastructure

Policy SI4 Managing heat risk

Policy SI5 Water Infrastructure

Sustainable Design and Construction SPG

## JUSTIFICATION

**6.7.14** It is anticipated that without implementing mitigation and adaptation measures, Climate Change will have a significant impact on Brent. Impacts include increased storms both in frequency and intensity, greater temperature variation (i.e. colder in winter, hotter in summer) and increased risk of flooding. Creating a resilient and efficient Brent, will not only tackle Climate Change within the borough, but also improve air quality and bring a number of economic and social benefits. Ensuring that all developments have high standards of environmental performance will be a key part in assisting. The London Plan and associated guidance provides a strong and challenging policy context in order to meet these objectives. As such Brent focuses its policies on more specific local requirements to support them.

## SUSTAINABLE DESIGN AND CONSTRUCTION

**6.7.15** The Mayor's Sustainable Design and Construction SPG provides detailed guidance on how to achieve environmental sustainability policy objectives in the London Plan effectively. The council acknowledges that minor developments will have limited opportunities to incorporate sustainability measures, however they should seek to reduce potential overheating and reliance on air conditioning system through good design.

**6.7.16** All major development proposals are to be accompanied by a Sustainability Statement demonstrating at the design stage, how sustainable design and construction measures will mitigate and adapt to climate change over the intended lifetime of a development. The statement must demonstrate the scheme has incorporated the advice set out in the Mayor's Sustainable



Design and Construction SPG, and any subsequent guidance, and meets the requirements of London Plan policy. Information on the sustainable design and construction measures included within minor development should be included within the Design and Access Statement.

- 6.7.17** For major non-residential development a Design Stage BRE Interim certificate of compliance and a Post Construction Certificate will be required to demonstrate achievement of a BREEAM rating of Excellent.

## WATER EFFICIENCY

- 6.7.18** London is in an area of high water stress, with demand for water forecasted to increase as a result of the growth in population and economy. Therefore, it is essential that development within Brent should seek to increase water efficiency and ensure the security of water supply. For residential development a Water Efficiency Assessment will be required providing evidence the development will meet the target of 105 litres or less per head per day, excluding an allowance of 5 litres or less per head per day for external water use.
- 6.7.19** For sewage collected from northern parts of Brent there is the potential for wastewater treatment infrastructure to be nearing capacity towards the end of the Plan period. Developers of major schemes are encouraged to engage with Affinity and Thames Water early on within their scheme design. This will ensure that water supply is provided in a timely manner. In addition it will ensure that pressure on the existing sewerage network is minimised. Consideration should be given to the use of water recycling measures, in particular grey water recycling, to reduce the impact the development will have on wastewater treatment infrastructure. The council will take into account advice from Thames Water in relation to water generated from developments in particular and where necessary will use appropriate conditions to ensure that development does not create risk of adverse environmental impacts caused by potential sewage outfall on watercourses.

## ENERGY EFFICIENCY

- 6.7.20** Improving energy efficiency within the borough is key if Brent is to be zero-carbon by 2050 as required in the London Plan. Greater energy efficiency will bring a number of environmental benefits, but will also deliver positive social impacts such as helping to tackle fuel poverty, and improving the health and

wellbeing of the borough's residents.

- 6.7.21** Policy SI2 of the London Plan requires major developments to be net zero-carbon, which is to be achieved through minimising carbon emissions in accordance with the energy hierarchy: Be Lean, Be Clean and Be Green. The carbon reduction targets should be met on-site. Only where it is clearly demonstrated carbon reduction targets cannot be fully met on site, any shortfall may be off-set through local carbon offsetting.
- 6.7.22** To help achieve the zero-carbon target, a change in how energy is supplied and used within developments is required. The council actively promotes decentralised energy systems, acknowledging the important role they could play in the borough's future energy supply. The Wembley Growth Area has an established decentralised energy system, with new major developments within this area expected to connect or contribute to the system. The Gloucester and Durham development at South Kilburn will provide the infrastructure to support delivery of a district network in that area. The council will seek to establish new sustainable energy networks within new Growth Areas identified within this plan. The council will maintain a record of constructed/ approved developments which have been designed to allow connection to a network.
- 6.7.23** The incorporation of on-site renewable energy generation makes a valuable contribution to the reduction of a site's carbon emissions. The council will strongly encourage the use of solar technology, and other innovative technological solutions, in major developments that will help reduce carbon emissions. Minor developments will be encouraged to maximise opportunities for on-site renewable energy generation, where feasible.
- 6.7.24** While sustainability standards are rising for new build developments, improvements to the energy efficiency of Brent's existing building stock will be necessary to achieve carbon reduction targets.
- 6.7.25** An Energy Assessment will be required to demonstrate that major developments will be constructed to achieve energy targets in accordance with London Plan energy hierarchy. Energy Assessments are to be prepared in accordance with the guidance in Appendix D of the Sustainable Design and Construction SPG. An Energy Assessment Review will be required no later than two months after completions confirming whether the development achieved the energy targets. Only if the feasibility study in the Energy



Assessment demonstrates that all on-site options have been considered and are not feasible, will carbon offsetting be considered.

- 6.7.26** In accordance with London Plan Policy SI2, where it is demonstrated that the zero-carbon target cannot be achieved developers should actively seek to deliver their remaining carbon savings through local carbon saving projects. As currently, Brent Council will use the standard London recognised price or that such as that set by the Zero Carbon Hub, and seek payment into a local fund which will be used to deliver carbon offsetting in the borough. Carbon offsetting schemes proposed by developers should accord to the Council's Carbon Offsetting Spending Policy.

## POLICY BSUI2 AIR QUALITY

**Major developments within Growth Areas and Air Quality Focus Areas will be required to be Air Quality Positive and elsewhere Air Quality Neutral. Where on site delivery of these standards cannot be met, off-site mitigation measures will be required.**

## ALTERNATIVE POLICY CONSIDERED

- 6.7.27 Relying on London Plan policy:** The London Plan policy adopts a strategic approach to tackling air pollution within the borough. Air quality is a significant issue within Brent, therefore it is considered that a more local approach in key hotspots of areas of change or where existing air quality is poor is adopted.

### LONDON PLAN

Policy SI1 – Improving Air Quality

London's Environment Strategy

London's Sustainable Design and Construction SPG

## JUSTIFICATION

- 6.7.28** Poor air quality is a prominent issue within Brent. A range of studies have shown that it can result in a range of short-term and long-term health impacts. These include the exacerbation of asthma, negative impacts on lung functionality and Chronic Obstructive Pulmonary Disease.
- 6.7.29** A range of interventions will be needed throughout the Plan period to address poor air quality within Brent. Air pollution is also a shared problem, so partnerships with other Local Authorities, the London Mayor and other

relevant stakeholders will be developed to maximise resources and realise wider air quality benefits.

- 6.7.30** London Plan Policy SI1 states that London’s air quality should be significantly improved and exposure to poor air quality, especially for the vulnerable, should be reduced. It also places a requirement on all development to be air quality neutral, unless it is the development of large-scale redevelopment areas or is large enough to be subject to an Environmental Impact Assessment where an air quality positive approach should be aimed for.
- 6.7.31** Brent’s Air Quality Action Plan identified Nitrogen Dioxide and Particulate Matter as the pollutants of most concern in the borough. An Air Quality Management Area (AQMA) covering areas of the borough where EU limit values are not, or are unlikely to be, met has been declared. AQMAs are shown on the Policies Map.
- 6.7.32** The high concentration of vehicle movements along the North Circular and other major thoroughfares means that these areas have some of the highest concentrations of pollutants within the borough. As a result of this, targeted action will be needed along the borough’s strategic road corridors.
- 6.7.33** For major development to be ‘air quality neutral’ it must meet the building emissions benchmarks set out in the Mayor’s Sustainable Design and Construction SPG. For developments to be ‘air quality positive’ they do not only have to be net zero carbon, but also contribute actively to a progressive reduction in emissions. The Mayor is developing guidance about the most effective approach to ensure a development is air quality positive.
- 6.7.34** Proposals should demonstrate how air quality targets will be met, and where applicable, exceeded through an Air Quality Impact Assessment. This is to be produced in accordance with guidance in the Mayor’s SPG. Where an Air Quality Impact Assessment cannot be made at the application stage, for example if the final technology decisions have not been made, it will be required by condition.
- 6.7.35** An Air Quality Impact Assessment by a suitably qualified person, is required for all major developments and installations of CHPs/ large communal boilers. The assessment will address baseline local air quality; whether the proposed development could significantly change air quality during the construction and operational phases; and/or whether there is likely to be a significant increase in the number of people exposed to poor air quality. It will also include mitigation

measures proposed to create an acceptable development. Mitigation measures will be site specific but could include for example urban greening or promoting the use of sustainable modes of transport. Post-completion stack emission monitoring may be required, to demonstrate that any approved energy plant meets the emission standards specified in the Impact Assessment.

The following policy proposes to take forward the existing policy in the Brent Local Plan. Underlines shows new text, ~~strikethrough~~ shows removed text.

### POLICY BSUI3 ~~DMP9A~~ MANAGING FLOOD RISK

**Proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction and:**

- a) minimise the risk of flooding on site and not increase the risk of flooding elsewhere;**
- b) wherever possible, reduce flood risk overall;**
- c) ensure a dry means of escape;**
- d) achieve appropriate finished floor levels which should be at least 300mm above the modelled 1 in 100 year plus climate change flood level; and**
- e) not create new basement dwellings in areas of high flood risk.**

**Proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.**

**Opportunities will be sought from the redevelopment of sites in functional floodplain (flood zone 3b) to restore the natural function and storage capacity of the floodplain. Proposals that involve the loss of functional floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be resisted.**

- 6.7.36** Consistent with national and London Plan policy development in Brent will not be allowed that unacceptably increases the risk of flooding. Development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical guidance on flood risk over the lifetime of the development. The West London SFRA

provides more detail of the requirements for FRAs undertaken to support development proposals in Brent. In accordance with national policy the sequential test will be applied to ensure development is steered to areas with the lowest probability of flooding. Where suitable sites of lower flood risk are not available, the Exceptions Test is a method to demonstrate and help ensure flood risk to people and property will be managed satisfactorily.

- 6.7.37** Developments which are required to pass the Exceptions Test will need to address flood resilient design and emergency planning in accordance with London Plan policy. This has to take account of the latest climate change allowance as identified by the Environment Agency, but take a precautionary approach to reducing long term risk based on the fact that such allowances are subject to periodic review.
- 6.7.38** Zone 3 flood zones for fluvial and surface water are shown on the Policies Map. Flood risk zones are shown on maps produced by the Environment Agency, available on their website and updated annually. For ease of use any such changes will also be made to the interactive West London SFRA maps as well as the Policies Map.

## INFORMATION IN SUPPORT OF APPLICATIONS

- 6.7.39** The following development proposals should be accompanied by a FRA to consider all forms of flooding:
- in flood zone 2 or 3 including minor development and change of use
  - more than 1 hectare (ha) in flood zone 1
  - less than 1 ha in flood zone 1, including a change of use in development type to a more vulnerable class (for example from commercial to residential), where they could be affected by sources of flooding other than rivers
  - in an area within flood zone 1 which has critical drainage problems
- 6.7.40** The West London SFRA sets out a check list for sustainable flood risk mitigation measures and level of detail to be included in site-based FRAs dependant on the flood zone to demonstrate how the development seeks to reduce flood risk. For development within Zone 3 for surface water, the applicant will be expected to have undertaken dialogue with the council's Lead Local Flood Authority representative prior to submission of an application.

The following policy proposes to take forward the existing policy in the Brent Local Plan. Underlines shows new text, ~~strikethrough~~ shows removed text.

## POLICY ~~BSUI4~~ ~~DMP9B~~ ON SITE WATER MANAGEMENT AND SURFACE WATER ATTENUATION

**~~Proposals for new development will be required to make provision for the installation and management of measures for the efficient use of mains water and for the control and reduction of surface water run-off. Substantial weight will be afforded to the target for mains water consumption of 105 litres or less per person per day and to the achievement of greenfield runoff rates for surface water. Where greenfield run-off rates cannot be achieved this should be clearly justified by the applicant.~~**

**Major development proposals or minor developments and changes of use which would impact on the current drainage regime must be accompanied by a drainage strategy.**

**The design and layout of major development proposals will be required to:**

- use appropriate sustainable drainage measures to control the rate and volume of surface water run-off;**
- ensure where feasible separation of surface and foul water systems;**
- make reasonable provision for the safe storage and passage of flood water in excessive events; and**
- demonstrate adequate arrangements for the management and maintenance of the measures used.**

**Proposals for minor developments, householder development, and conversions should make use of sustainable drainage measures wherever feasible and must ensure separation of surface and foul water systems.**

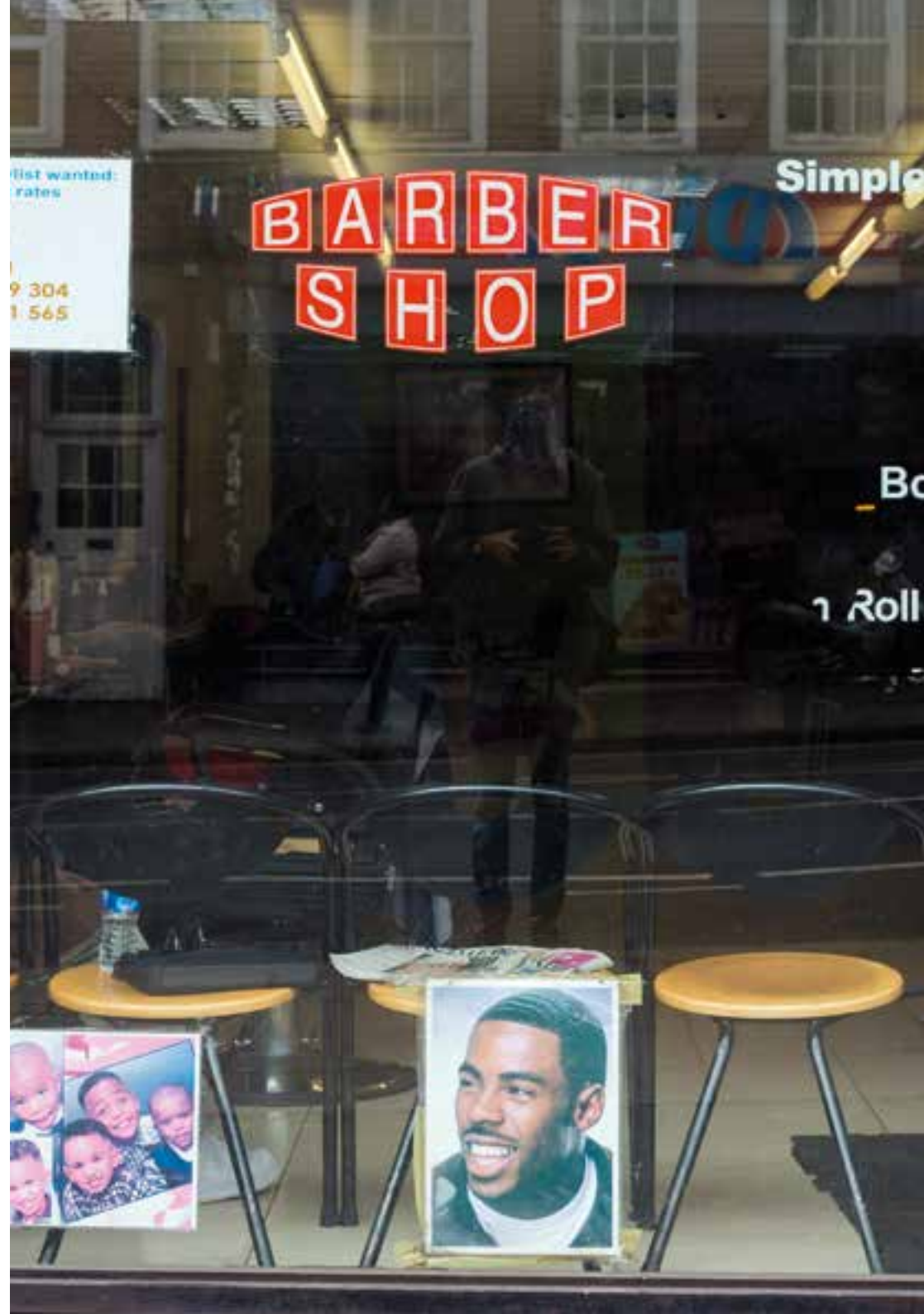
**Proposals that would fail to make adequate provision for the control and reduction of surface water run-off will be refused.**

## ALTERNATIVE POLICY CONSIDERED

- 6.7.41 Rely on London Plan Policy.** This is not considered to be appropriate as this policy adopts a strategic approach to flood risk. As identified within the West London SFRA there are areas within the borough where more localised episodes of flooding, particularly surface water flooding, occur.

## JUSTIFICATION

- 6.7.42** The London Plan in Policy S15 'Water Infrastructure' identifies the pressure on London's water supply related to existing scarcity which will be exacerbated by climate change and population growth. Similar to most of London, Brent also has combined sewer networks which do not have the capacity to deal with extreme events, consequently causing pollution to water courses. As such consistent with London Plan policy it is necessary to ensure that water use is limited to protect supply, but also reduce potential for pollution. The 105 litres target is consistent with Part G2 of the optional requirement of the 2010 Building Regulations which specifies maximum consumption values for water fittings. Brent gives significant weight to this element of London Plan policy. Conditions will be applied to planning permissions to ensure the delivery of this element of the building regulations.
- 6.7.43** It is a national requirement for all major development and all developments in areas of flood risk to utilise sustainable drainage systems (SuDS), unless demonstrated to be inappropriate. London Plan policy S13 states development should aim to achieve greenfield run-off rates and ensure that surface water is managed as close to its source as possible in accordance with the drainage hierarchy. The council will assess applications involving SuDS in its role as Lead Local Flood Authority. It has a preference for natural SuDS than mechanical.
- 6.7.44** A Drainage Strategy will be required for all major developments and also for minor developments and change of use proposals which will impact on the current drainage regime. This must demonstrate how surface water could affect a site and the surrounding areas. Detail will need to be provided on how water is expected to behave on site, determine the site's SuDS infiltration potential, runoff rates, and flow pathways, both before and after the proposed development is in place.
- 6.7.45** A SuDS and drainage strategy maintenance plan will also be required. The developer is to provide Water Quality and Biodiversity Statements and cost benefit analysis for conventional and SuDS systems. It must also be demonstrated SuDS have been designed in a way which contributes to the delivery of Brent's Surface Water Management Plan and other policy. A Drainage Strategy Submission checklist is provided within the West London SFRA.



# 6.8 TRANSPORT



## TRANSPORT

### WHERE ARE WE?

- 6.8.1** Overall Brent has generally good public transport links. It is the joint top borough for the number of rail and underground stations in London. It is served by the Jubilee, Metropolitan, Bakerloo and Piccadilly lines and the London Overground. In addition, the Chiltern Line runs between Marylebone and South Buckinghamshire via Wembley Stadium station. It has many bus routes serving town centres within and outside the borough. Whilst the underground and overground provide good radial links to Central London, orbital links are served by the bus network and therefore less reliable due to road congestion. Road congestion is experienced in parts of the borough during peak times and is a major contributor to poor air quality. Areas of particular pressure include the North Circular which intersects the borough, and the road network around Wembley on events days.
- 6.8.2** Brent also has a number of industrial estates that both rely on and generate freight movements. Freight, deliveries and construction traffic have a significant impact on the network in terms of congestion, road safety and air quality.
- 6.1.3** There are two radial cycle routes in the borough and one orbital route forming part of the 900km London Cycle Network Plus. However, cycling take up is still relatively low and varies across the borough. In the borough's south cycling claims 2-5% modal share of journeys, whereas in the north this falls to 0-1%. One of London's metropolitan walking routes passes through Brent. The Capital Ring, a 78 mile walking route which encircles London, connects Northwick Park and South Kenton to Welsh Harp. Pedestrian mode share accounted for 27% of all trips in 2013/14-2015/16. Quality of public realm and safety have been cited as barriers both to walking and cycling.

### WHERE DO WE WANT TO BE?

- 6.8.4** The Mayor's Transport Strategy has a target that by 2041 80% of all journeys will be undertaken by walking, cycling and public transport. Currently 41% of journeys in the borough are by private vehicle. To reduce this to 20% will require a significant change in behaviour. The council is committed to working towards this target and the Brent Long Term Transport Strategy 2015-35, identifies how we will promote sustainable travel (public transport) and active travel (such as walking and cycling) over the use of private vehicles. The Brent Local Implementation Plan is updated on a rolling basis. It sets out the transport schemes that will be invested in to achieve the objectives of the Transport Strategy.
- 6.8.5** Sustainable travel is not only necessary for the road network to cope with demand, but there are clear health benefits in promoting active travel and reducing air pollution from vehicles. To make active travel the preferred choice for shorter journeys the quality and coverage of walking and cycling routes in the borough will need to be improved. New walking routes will be designed to healthy streets standards (see Figure 34), taking account of the needs of all users including older people and disability groups. Brent's cycle network will be extended to include new Quietways. The Brent section of the Gladstone Park to Regent's Park Quietway is now complete. Future cycle routes include Wembley Park to Harrow Weald Quietway.

**FIGURE 34: HEALTHY STREETS STANDARDS**



**6.8.6** The council will be working closely with its partners including TfL, the West London Alliance and WestTrans to improve public transport access for all across Brent. A key priority for the council is to improve orbital links from east to west through the West London Orbital (WLO) rail link. The link would make use of the existing Dudding Hill freight line to create an overground passenger line connecting Old Oak Common and High Speed 2 to Brent Cross West via Harlesden, Church End and Neasden in approximately 15 minutes. It will also be important that strong pedestrian links are created from surrounding stations into the borough. A pedestrian route over the A5 is needed to connect Brent Cross West station to Staples Corner. To the south the regeneration of Old Oak, being led by the Old Oak and Park Royal Development Corporation, is a key opportunity to improve connections from Harlesden to Old Oak and secure a much needed upgrade to Willesden Junction station. In addition, the council will continue to work with bus operators to improve coverage to key destinations and interchange facilities. It will be important that public transport is accessible to all, with step free access to overground and underground stations a key priority. Step free access will be introduced at Brondesbury Station and feasibility work is being undertaken for Northwick Park and Stonebridge.

**6.8.7** Developers will also be key to achieving this ambition by ensuring new developments, through their design and use of technology, make active travel the preferred choice for users. Major developments and growth areas will need to connect and contribute to cycling and walking routes; be located in areas with good public transport access; be car-free or car-lite; enable broadband access to encourage home working and assist independent living.

**LONDON PLAN**

London Plan T2 Healthy Streets

London Plan T5 Cycling

London Plan Pedestrian Comfort Guidance for London, TfL

London Cycle Design Standards, TfL

West London Cycle Parking Design Guide, WestTrans



## POLICY BT1 SUSTAINABLE TRAVEL CHOICE

**The council will prioritise active and sustainable travel over private motor vehicles. The council, will work with its partners and, where appropriate, require developments to:**

### ACTIVE TRAVEL

- a) **design public realm to meet healthy streets principles and provide access for all; Publicly accessible private space will be managed in accordance with the Mayor's Public London Charter;**
- b) **protect the character of the Capital Ring walking route and, where appropriate, contribute to its improvement;**
- c) **provide for and make contributions towards connected, high quality, convenient and safe cycle routes and facilities, including cycle parking, in line with or exceeding TfL and WestTrans design standards, including the implementation of new Quietways and a borough wide cycle hire scheme;**
- d) **enhance the A5 corridor to reduce traffic dominance and improve the public realm;**
- e) **improve environmental quality along the North Circular;**
- f) **remove vehicle cross-overs or other public realm features no longer required**

### SUSTAINABLE TRAVEL

- g) **enable the delivery of the West London Orbital overground;**
- h) **create a high quality pedestrian connection from Brent Cross West Thameslink station to Staples Corner and the wider area;**
- i) **create a high quality pedestrian and cycle connection between Harlesden and an upgraded Willesden Junction station;**
- j) **increase the number of tube and overground stations with step free access in the borough;**

### CLEAN TECHNOLOGY

- k) **improve the coverage and journey time reliability of the bus network and enable improved interchange facilities;**
- l) **support improvements to Wi-Fi and move towards 5G across the borough to reduce the need to travel;**
- m) **increase coverage of Electric Vehicle charging points across the borough.**

## ALTERNATIVE POLICY CONSIDERED

**6.8.8 To prioritise travel by car:** Given projected population growth and the pressure this will place on the transport network, the only sustainable long term solution is to prioritise active and sustainable travel. A policy approach which prioritised travel by car would not be in conformity with the NPPF or London Plan.

**6.8.9 To not enable the delivery of the West London Orbital:** If the West London Orbital is not taken forward orbital travel will continue to be dependent on the car and bus network. Due to road congestion these options are less reliable, and therefore have detrimental economic and social impacts.

## JUSTIFICATION

**6.8.10** Promoting active and sustainable travel has recognised health benefits. Private vehicles are a major contributor to poor air quality in the borough. Prioritising private vehicle use would have negative environmental impacts in terms of air and noise pollution. Active travel has recognised benefits for physical and mental health. Government guidance recommends children aged 5 to 18 need 60 minutes of moderate intensity activity each day, whilst adults are recommended 150 minutes each week. Promoting walking and cycling will help ensure people get the level of activity they need to stay healthy.

**6.8.11** Safety and quality of public realm have been cited as two key barriers to walking and cycling. To address this it will be important walking routes are designed to healthy streets standard. New cycling routes and Quietways will be delivered in accordance with the most up to date Brent Cycling Strategy.

**6.8.12** New development can make some existing public realm features become redundant and adversely impact on the quality of the walking environment. This includes features such as vehicle cross-overs which can perpetuate uneven surfaces or encourage obstruction of the footway by vehicles. Where such redundant features occur, these should be removed and the public realm made good by the development.

**6.8.13** An improved public transport network is also needed for longer journeys. The WLO is an opportunity to make use of an existing freight line to improve the reliability of orbital travel in Brent. Subject to feasibility the council is seeking stations initially at Harlesden and Neasden with interchanges to the existing transport network. In time other stations the feasibility of other stations such as

Gladstone Park will also be considered. To futureproof the route 8-car platforms are sought. Other than WLO there are limited opportunities to further extend the underground and overground network in the borough. It is important that improved connections are created from the borough to proposed stations on its boundary including Brent Cross West Thameslink Station and HS2 and Elizabeth Line stations at Old Oak. To the north of the borough the priority will be to enhance the coverage and frequency of the bus network.

**6.8.14** The North Circular Road is part of the Transport for London Road Network and the A5 is a London Distributor Road. Both experience high volumes of traffic and at times congestion, which impacts on the quality of the environment in the surrounding area. Environmental improvements will be sought. Along the A5 there are opportunities to improve the public realm and increase tree planting. Intelligent signing could help manage traffic flow along the North Circular.

## TRANSPORT IMPLICATIONS OF NEW DEVELOPMENT

**6.8.15** London Plan Policy T4 sets out the need for developments to appropriately address impacts on the movement network in order to gain consent. It also identifies the need for transport assessments and associated travel plans to be submitted in association with major developments. This will therefore be a requirement for all the site allocations before or at the time planning applications are submitted for their development.

**6.8.16** Where significant impacts arise including during development construction, mitigation measures should be proposed and the residual impacts assessed. This includes mitigation on small scale schemes where issues are not caused by levels of generated traffic, but by poor design. Planning obligations may be sought to fund mitigation measures to make development acceptable or conditions may be imposed on a planning permission to restrict impacts.

**6.8.17** The range of mitigation for which planning obligations may be sought includes, but is not restricted to, the following. These have been selected as examples as they either encourage use of sustainable modes or manage those trips which need to be made by car on the highway network:

- a) Travel Plans.
- b) Public transport improvements sufficient to service the scheme or to integrate it with the surrounding area. Developments attracting a significant number of trips in areas with low or moderate public transport accessibility

or causing capacity issues to the existing network will only be acceptable when significant public transport improvements are secured which are both viable and justifiable in the longer term.

- c) The extension or bringing forward of on-street parking controls or waiting restrictions due to an unacceptable impact on road safety, emergency vehicle access or traffic management.
- d) Improvements to pedestrian and/or cycle facilities.
- e) Traffic calming measures.
- f) Acceptable road safety and essential highway improvements, not necessarily restricted to the immediate development area.
- g) Programmes to reduce car usage and ownership (car pooling, car clubs).

## LONDON PLAN

Policy T4: Assessing and mitigating transport impacts

Transport Assessment Best Practice Guidance, TFL

Travel Plan Guidance, TFL

## PARKING AND CAR FREE DEVELOPMENT

**6.8.18** London Plan policies T6 – T6.5 address parking and provide associated parking standards. For uses not covered by London Plan policy, local standards are set out in Appendix 4. The requirements for electric charging points and cycle parking must be consistent with London Plan policy T6 and for residential development T6.

**6.8.19** Preference is for electrical charging points to be provided within the highway, or publicly accessible to encourage greater use.

**6.8.20** This policy seeks to ensure that parking levels do not encourage unnecessary traffic generation. It also ensures that requests for additional parking meet a number of conditions which mean that the local area is not negatively impacted upon by parking. Parking in town centres deals with existing parking and additions to or losses of parking.

The following policy proposes to take forward a slightly amended existing policy in the Brent Local Plan that relates to Parking Policy DMP12. Underlines show new text, ~~strikethrough~~ shows removed text.

# THE LIBRARY



LIBRARY  
CAFE  
OPEN



1893

## POLICY BT2 ~~DMP12~~ PARKING AND CAR FREE DEVELOPMENT

~~Parking standards and managing the availability of car parking~~ Developments should provide parking consistent with parking standards in Appendix 13. Car parking standards are the maximum and car free development will be encouraged where an existing Controlled Parking Zone (CPZ) is in place or can be achieved.

~~In appropriate locations benefiting from high levels of public transport access, generally with PTAL 4 or above, opportunities for car free development should be considered.~~

~~In areas with Controlled Parking Zones access to on-street parking permits for future development occupiers other than for disabled blue badge holders will be removed or limited.~~

Contributions secured through a planning obligation to existing and new car clubs and pool car schemes in the borough will be strongly encouraged in place of private parking in developments.

### MANAGING THE IMPACT OF PARKING

Additional parking provision should not have negative impacts on existing parking, highways, other forms of movement or the environment. The removal of surplus parking spaces will be encouraged. Development will be supported where it does not:

- a) add to on-street parking demand where on-street parking spaces cannot meet existing demand such as on heavily parked streets, or otherwise harm existing on street parking conditions;

NATIONAL and LONDON PLAN

London Plan T6 Car parking

Emerging Design of Car Parking, TfL

### ALTERNATIVE POLICY CONSIDERED

**6.8.21 No policy:** Having no cap on car parking would place additional pressure on the road network, resulting in congestion, poorer air quality and increased carbon emissions. Front gardens and tree planting slow the flow of water into water bodies and the drainage network. Allowing the loss of front gardens will cumulatively negatively impact on biodiversity, water quality and contribute to surface water flooding.

- b) require detrimental amendment to existing or proposed CPZs; In areas with CPZs access to on-street parking permits for future development occupiers other than for disabled blue badge holders will be removed or limited;
- c) create a shortfall of public car parking, operational business parking or residents' parking;

The council will require off-street parking to:

- d) preserve a building's setting and the character of the surrounding area;
- e) preserve any means of enclosure, trees or other features of a forecourt or garden that make a significant contribution to the building's setting and character of the surrounding visual appearance of the area; and
- f) provide adequate soft landscaping (in the case of front gardens 50% coverage), permeable surfaces, boundary treatment and other treatments to offset adverse visual impacts and increases in surface water run-off.

Public off-street parking will be permitted only where it is supported by a transport assessment and is shown to meet a need that cannot be met by public transport.

### PARKING IN TOWN CENTRES

The council will accept the loss of off street short-term publicly available parking only where this would not lead to under-provision in the locality.

~~In town centres where there is a deficiency of short term public car parking, subject to development viability, the Council will seek additional provision within major developments.~~

### JUSTIFICATION

**6.8.22** The amount of parking provided in accordance with parking standards is a balance between a number of factors. These include seeking to reduce unnecessary car trips, promoting effective use of land, making development viable and not creating on street parking pressure which undermines quality of life. The standards promote fewer spaces in locations better served by public transport. The emphasis is on not trying to provide spaces where they are unnecessary. Opportunities for car free development might include locations close to public transport interchanges where space for parking is constrained. Other areas that are easily accessible by public transport may also be suitable for car free development. Where development is car free,

or there is a limit on the number of occupiers able to park on-street, legal agreements or conditions will be used to ensure that future occupants are aware they may not be entitled to on-street parking permits. Reductions in parking provision can also be delivered through car clubs and pool cars which promote more efficient use of spaces. Even within car free development disabled parking will be required in line with London Plan standards.

- 6.8.23** The design of car parking should be consistent with Brent’s Domestic Vehicle Footway Cross-Over Policy Guidance. It should support other objectives for Brent including improving design quality and a sense of place, green infrastructure provision, bio-diversity and sustainable drainage. TfL’s emerging Design of Car Parking guidance will also provide advice on this matter .
- 6.8.24** To support town centre vitality and viability the council will seek the retention of short term publically available parking spaces where they are. Town centre development will be required to make available to the public any parking provided. New public off-street parking will be subject to a legal agreement to control the layout of the parking spaces, the nature of the users and the pricing structure. Where parking is created or reallocated, the council will encourage the allocation of spaces for low emission vehicles, car clubs, pool cars, cycle hire and parking, and electric vehicle charging equipment.

## MOVEMENT OF GOODS AND MATERIALS

- 6.8.25** The London Plan policy T7 requires development to facilitate sustainable freight and servicing, from road to rail and water. Proposals for development are to be accompanied by Construction Logistics Plans and Delivery and Servicing Plans. These must be developed in accordance with TfL guidance and reflect the complexity of the development. To reduce pressure on the road network delivery outside of peak hours should be encouraged. Larger developments should include facilities to enable micro-consolidation. The provision of hydrogen refueling stations and rapid electric vehicle charging points at logistics and industrial locations is also supported by London Plan policy. This is to support carbon-free travel from 2050.

The following policy proposes to take forward the existing policy in the Brent Local Plan that relates to Movement of Goods and Materials Policy DMP13 and retitle Freight and Servicing. Underlines show new text, ~~strike through~~ shows removed text.

## POLICY BT3 ~~DMP13~~ MOVEMENT OF GOODS AND MATERIALS FREIGHT AND SERVICING

### PROVISION AND PROTECTION OF FREIGHT FACILITIES

**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. The use of more sustainable alternatives, i.e.by rail and canal, is encouraged.**

**For longer distance movements, the provision of sidings within suitable new developments adjoining railway lines is supported. Warehousing development, adjoining rail lines where rail access can be provided, should include sidings.**

**Existing sidings will be protected where these are adaptable to serve anticipated needs.**

### SERVICING IN NEW DEVELOPMENTS

**The provision of servicing facilities is required in all development covered by the Plan’s standards in Appendix 45. The Council will work with developers to provide the optimum servicing and delivery arrangements for new developments. Wherever possible servicing should be provided off the highway. Loss of existing servicing will be resisted where it is still required to meet operational needs.**

### ALTERNATIVE POLICY CONSIDERED

- 6.8.26 No policy:** If freight is not directed to more sustainable modes this will result in increased pressure on the road network. Reduced reliability will have negative impacts on business and the local economy. There will also be negative impacts on the environment due to poorer air quality and carbon dioxide emissions, which will impact on health.

### JUSTIFICATION

- 6.8.27** Efficient handling and transport of freight is crucial for the regeneration of the industrial areas of the borough. Rail and water are much more sustainable means of transporting freight over longer distances than by road and can be more economic. Even where movement by road is necessary for part of the journey, transshipment to rail/water for the remainder is to be preferred. There

are opportunities for rail freight related development within the Park Royal and Wembley Strategic Industrial Locations and by water along the Grand Union Canal.

## LONDON PLAN

London Plan T7: Freight and Servicing

London Freight Plan, TFL

## THE HIGHWAY NETWORK

**6.8.28** The priority to promote sustainable modes of transport will help to reduce pressure on the existing highway network. Nevertheless, it is also important that the network should operate efficiently and safely for all users. There is a requirement for a balance to be achieved between different road users' needs. This will depend to a large extent upon the character of the road and its role within the road hierarchy. Where new development requires access to the road network, account needs to be taken of these factors and ensure no adverse highway safety impact.

The following policy proposes to take forward the existing policy in the Brent Local Plan that relates to Forming an Access on to a Road Policy DMP11. Underlines show new text, ~~strikethrough~~ shows removed text.

### POLICY BT4 ~~DMP11~~ FORMING AN ACCESS ON TO A ROAD

**Other than the Transport for London Road Network (TLRN) and London Distributor Roads applications for the creation of an access to a highway or where development will result in the increased use of existing access points will be acceptable where:**

- a) ~~the location of the access would be at a safe point~~ **having regard to the council's cross over guidance;**
- b) **the access and amount of off-street parking proposed would be visually acceptable (having regard to existing highway verges and trees affected);**
- c) **on Heavily Parked Streets, the proposal does not result in the loss of more than one on-street car parking space, and where there is controlled parking does not result in the creation of more off-street spaces than set out in the parking standards.**

**On New accesses on the TLRN (the North Circular Road) will be resisted in all**

**cases except where offering improved road safety for all users. A preliminary safety audit must be submitted with all major development proposals which about the TLRN. Similarly, New accesses on TLRN and London Distributor Roads (as shown on the Policies Map) should be resisted where alternative access is available to the side or rear and turning facilities should be provided where possible. On London Distributor Roads. Increased use of existing safe access points will be allowed where it does not harm the road's strategic traffic distribution role and particularly that of bus movement.**

~~A preliminary safety audit must be submitted with all major development proposals which about the TLRN.~~

## ALTERNATIVE POLICY CONSIDERED

**6.8.29 No policy:** Failure to manage access on to the highway network will impact on road safety and also increase road congestion. This will impact negatively on air quality, carbon emissions and health and well-being. Allowing off-street parking without consideration of visual impacts will result in the loss of trees and vegetation which cumulatively will have negative impacts on biodiversity, drainage and the quality of the public realm.

## JUSTIFICATION

**6.8.30** Heavily Parked Streets have been identified across the borough. This has been done for two reasons: to help manage new residential development parking without detrimental impact on highway safety; and so that any new access created would not result in an excessive loss of on-street parking spaces where there is a current shortage. In relation to criterion c) of the policy, greater flexibility to the loss of more than one parking space may in exceptional cases be justified. An example might be where off-street parking provided as part of a proposed development together with other measures would reduce the on-street parking demand compared to the existing use. The council is keen to maintain and enhance the street scene through the provision of green infrastructure. It has an extensive programme of street tree planting.

**6.8.31** The North Circular Road is a Transport for London Route Network (TLRN) road. It forms a Corridor Link between Brent Cross and Ealing (two major interchange points by public transport as well as by road). It provides a parallel option for through traffic which can help take pressure off the Brent Cross to Wembley and Wembley to Ealing routes which will carry more locally



based traffic. The road forms a key element in the London road network in channelling essential traffic, especially freight, away from inner London. Brent is keen to see more of a balanced approach with emphasis on other modes, rather than the needs of car users dominating. To this end there is a general presumption against locating new accesses on to the route. Nevertheless, it is recognised that sometimes additional access is necessary to facilitate regeneration, or that safety improvements could be made thorough alternative provision. For other strategic movement corridors a similar approach to ensuring its function is not unacceptably impacted upon by the development is sought either through capacity or safety issues.

**6.8.32** In relation to transport matters in development proposals priority should be given to safety issues. This includes the convenience and safety of vulnerable road users such as pedestrians and cyclists. Improvements to road safety should follow recognised guidance, including the Road Safety Action Plan (TfL). This advises that a preliminary safety audit should be submitted with all major development proposals and associated transport changes on the TLRN. TfL has a strategic management function in minimising congestion on its Strategic Road Network. It requires consultation on proposals which would affect this network, which includes Edgware Road and Harrow/Watford Road corridors. Proposals which would affect the M1 Motorway shall require consultation with Highways England. Where a developer is required to undertake works to the highway to make their access acceptable, this will be expected via a section 278 agreement (see Glossary).

#### EVIDENCE BASE

Mayor's Transport Strategy

Brent Local Implementation Plan

Brent Long Term Transport Strategy

Brent Cycle Strategy

Brent Walking Strategy

Brent's Parking Standards Heavily Parked Streets

ON

KINGSBURY STATION

7 DELIVERY AND MONITORING





## DELIVERY

- 7.1.1** The successful delivery of the vision for Brent, the Places and theme policies is reliant upon effective, coordinated and committed delivery from a multiplicity of public agencies; as well as the ability to secure sustained substantial levels of private commercial interest, investment and capacity to support development. This will be at levels realistically not seen in over a generation. It is against a backdrop of significant financial challenges across much of the public sector, operating on much reduced budgets since the commencement of austerity.
- 7.1.2** The Mayor through the London Plan has sought to meet nearly all London's projected housing needs within its boundaries. He has been clear in the London Plan and other lobbying that London's continued growth will require significant additional financial and other support from central Government to ensure successful delivery. This relates not only to supporting housing delivery, but also the associated infrastructure related to population and economic growth. This will require a long term commitment and associated actions from Government. The London Plan currently identifies a total gap between committed and required funds of £3.1 billion per annum. Without providing clarity on how this funding gap will be addressed Government has made it clear that it London should deliver more housing than is currently included in the London Plan.
- 7.1.3** The planning process has two main mechanisms for ensuring or contributing to the delivery of some of the infrastructure that will be required related to development that is given planning permission. These are the Community Infrastructure Levy (CIL) and S106 planning obligations. CIL currently is providing about £15 million per year towards infrastructure. Planning obligations are used for requirements not addressed by CIL.

## HOUSING

- 7.1.4** This Plan has been ambitious in seeking to identify long term the delivery of housing sites at a level that is way above recent previous planned levels. Not meeting the Government's Housing Delivery Test provides a significant risk of losing control of how planned development occurs within the borough. The ability of Councils to deliver housing has been severely constrained by the borrowing cap, meaning Councils are largely reliant on private developers to deliver housing.

- 7.1.5** As such this means that the Council has no other realistic option than to grant planning permission for development in accordance with this plan's and national and London Plan policies. This will provide a number of challenges, particularly around associated infrastructure to keep pace with assumed levels of delivery. Whilst providers will be aware of the location and timing of population growth it will however mean that due to funding lags most social infrastructure and some physical infrastructure will be playing catch up after development has been delivered. This will inevitably impact on existing communities.
- 7.1.6** The Council in the Plan has sought to plan as best as it can to meet housing needs. As identified by the Council's evidence base, there is a chronic need for affordable housing. This is well beyond the private sector's and planning policy's ability through S106 planning obligations to assist delivery through cross subsidisation on development sites. Realistically the deficit can only be addressed through greater public sector investment than is currently available to Registered Providers (housing associations) and the Council. The Council will nevertheless continue through looking at the potential of its own housing estate, but also through direct provision through an arm's length delivery vehicle (I4B) in assisting delivery.
- 7.1.7** The Mayor has various initiatives to support the build to rent sector, small and medium sized builders and increasing capacity of the construction industry. These if increased and perpetuated will assist in delivery. Where this plan has identified the need for comprehensive redevelopment of larger sites, the Council will consider the powers available to it to compulsory purchase sites where delivery is being compromised by landowners not engaging positively to take sites forward.

## TRANSPORT

- 7.1.8** The London Plan identifies the risk associated with the delivery of new strategic transport projects and on-gong funding for supporting and expanding existing services. The continued necessity in Brent to prioritise people's movement through non-private car modes to limit congestion means that sustained investment in public transport is required. The most significant proposed public transport scheme that is planned within Brent is the opening of the West London Orbital line. This is in its early stages of planning. Indications are that this project could be completed at its earliest by 2026. Realistically, due the nature of rail projects, this is the best case scenario and is

likely to take a bit longer.

**7.1.9** In terms of cost/ benefit analysis the business case is strong. This however, does not necessarily mean it will be funded within current timescales to ensure its envisaged delivery, if at all. It is competing against many other projects for TfL and Network Rail funding. Its lack of delivery will be a significant blow to, but ultimately not fundamentally undermine delivery of the Neasden stations' growth area and smaller planned development around Cricklewood and Harlesden. In relation to the Staples Corner Growth Area however, it may well impact on development scale and timing. This area does not have very good public transport accessibility currently. Investor perceptions of the area/ market sentiment could well be changed if it is not delivered. This could well impact on the viability of co-location/ intensification of the industrial area.

**7.1.10** In relation to other transport requirements, where sites have specific significant local impacts on infrastructure they will be required to overcome through S106 planning obligations. It is not envisaged that these will be a significant potential blockage to development delivery. The Council sets out the investment priorities on an on-going rolling 5 year basis for transportation in its Local Implementation Plan (LIP). This is agreed by the GLA as a mechanism for identifying where its funds will be used to support transportation schemes in the borough.

## EDUCATION

**7.1.11** Schools planning is complex and made more difficult by the more recent changes in the role that local authorities have, in particular their lack of direct provision. It is increasingly reliant on foundations and free schools on which it has limited influence to provide places. The need for places is often subject to short term cyclical changes. Factors such as economic cycles, people's prosperity, fertility rates, national sentiment, lifestyles and migration can radically impact on birth rates affecting demand. In addition the quality of Brent's schools compared to neighbouring boroughs also is a significant factor.

**7.1.12** In terms of early years and primary school places in the short to medium there is sufficient capacity. Two additional primary schools are planned, one at Oriental City on the Edgware Road and the other at York House, Wembley Park. Without the provision of two new secondary schools within the next

five years, there is likely to be a shortage of spaces. One school is planned for Chancel House, Church End, whilst another is required, ideally in the north. In terms of identifying and planning for future needs, education planners have a good understanding of development patterns and future population trends to be able to deal with growth.

**7.1.13** The College of North West London is consolidating and relocating from dispersed sites to one site in Wembley Park. This will improve the quality of its teaching facilities and be supported by funds from enabling development on its existing sites.

## HEALTH FACILITIES

**7.1.14** As with schools, health planning has become more complicated over time. The National Health Service is split up into various layers. Brent has two acute national health hospitals. These are at Northwick Park and Central Middlesex, run by the London North West University Health Trust. The Council has on-going dialogue in relation to their estate. Currently both sites are subject to master-planning allow capacity to meet their future needs and other associated providers (ambulance and Clinical Commissioning Group (CCG)) to be accommodated. The Council also works closely with Brent CCG on their estate strategy and in seeking sufficient capacity for General Practitioner surgeries where required on new development sites. Recent examples include the Peel development in South Kilburn and Northfields at Alperton. Subject to early identification of the need for premises from the CCG, it is not envisaged that there will be significant difficulties in addressing longer term needs arising from developments related to additional premises.

## UTILITIES

**7.1.15** In relation to water, electricity and gas communications received from providers and analysis of longer term infrastructure investment plans indicates no significant barriers to delivery. Thames Water have recently confirmed that previous concerns about medium term capacity in the sewage treatment works that serve Brent have been addressed.

**7.1.16** For all of these utilities, there might be a need for some local capacity enhancement but as long as developers engage early on in their projects it is not envisaged that there will be significant 'showstopper' events preventing occupation of development.

## GREEN INFRASTRUCTURE

**7.1.17** The most significant piece of new green infrastructure that will be added to Brent will be through the development of a new park at Wembley Park. Elsewhere in relation to the Growth Areas, the master planning process will provide greater clarity on the extent and location of additional green space. The council will continue to seek to work with developers to ensure sufficient provision of space on site and local improvements. A significant project for improvement of existing open space are the Brent River Park north of the North Circular which will improve bio-diversity and recreational resources as well as contributing to flood alleviation. The council's role in managing parks, open spaces and the public realm will continue to play a significant part in the quality of the green infrastructure network. It also has large implications for sports provision as well, as many playing pitches are within council managed spaces. As in many cases this is non-statutory work, it is likely to be subject to increased budgetary pressures, which will result in amendments to management regimes and different ways of trying seeking to support their continued high quality provision.

## CULTURAL INFRASTRUCTURE

**7.1.18** There are two significant improvements that need to be made to existing sports centres. These are at Bridge Park and Vale Farm, both of which essentially need to be replaced. Bridge Park leisure centre plans are more advanced and will be delivered in association with an adjacent development site where the council has a development partner. Vale Farm is less certain at this stage. It is identified as having the potential as a regional sports facility in the Sudbury Neighbourhood Plan. The council will need to work with the Sudbury neighbourhood forum to clarify how this ambition can be met within the parameters of the local green space designation and the realistic funding opportunities that are available. Elsewhere most of the cultural facilities will be provided by trusts, interest and faith groups and also commercial enterprises, reflecting demand/ needs related to particular interests. This plan seeks to ensure that existing uses are not lost to more valuable uses, or if they are no longer viable other cultural/ community uses are given the opportunity to use that space/ site.

## INFRASTRUCTURE DELIVERY PLAN

**7.1.19** The council has an Infrastructure Delivery Plan. This will be reviewed on an on-going basis. It will inform the council's capital programme and the work that it does in terms of supporting other agencies delivering infrastructure requirements, particularly through developer contributions, such as Community Infrastructure Levy, and to a much lesser extent due to its more limited role, S106 planning obligations.

## 7.2 Monitoring

**7.2.1** Monitoring is an important part of the continuous planning process. A set of key indicators and targets have been developed so that the effectiveness of policies in achieving the objectives can be assessed. Where objectives are not being met, appropriate action may be taken which can adjust the outcome or, in some circumstances, a review of policy may be necessary. The targets have been summarised in Figure 35 highlighting the relationship between the policies, indicators and targets.



**FIGURE 35 LOCAL PLAN POLICY PERFORMANCE MEASURES**

<b>PERFORMANCE MEASURE</b>	<b>TARGET</b>	<b>SPECIFIC POLICY TO BE MONITORED</b>
Tall Buildings allowed inconsistent with policy	None	DB2
Residential basements in existing properties allowed that are larger than policy criteria	None	DB3
Net additional homes built	Meeting the NPPF Housing Delivery Test	BH1
Proportion of Homes Built in Growth Areas	60%	BH2
Built to Rent Properties Net Additions	20% of net additional homes 2019/20-2028/29	BH3
Percentage of affordable housing within major development with an affordable housing planning obligation.	>35%	BH5
Tenure split of affordable housing within major development with an affordable housing planning obligation.	70% social/affordable rent below LHA rates 30% intermediate	BH5
Percentage of net additional homes built 3 bedrooms or more	25%	BH6
Additional bed spaces built in communal establishments	No target	BH7
Specialist Older Persons Homes Built	230 net additional homes 2019/20-2028/29 average per annum	BH8
Net Number of Additional Gypsy and Traveller Pitches Provided	Consistent with accepted definition	BH9
Net number of dwellings lost where the development results in an overall loss of dwellings	No target	BH10
Number of permissions where conversion of an existing 3 bed dwelling results in additional dwelling plus family accommodation	No target	BH11
Amount of managed affordable work space provided.	No target	BE1
Net additional employment floorspace provided in SIL, LSIS and LES	No target, but definitely no loss	BE2 and BE3
Additional A4 or A5 units granted permission in Primary Shopping Frontages	None	BE4
Proportion of primary frontage in A1 and A2 use.	Proportion of frontage in A1 and A2 use not to fall below 65%, or 50% if vacancy rates exceed 10%.	BE4

PERFORMANCE MEASURE	TARGET	SPECIFIC POLICY TO BE MONITORED
Concentration of betting shops, adult gaming centres and pawnbrokers	Proportion of frontage in use as betting shops not to exceed 4%, and proportion in use as adult gaming centres or pawnbrokers not to exceed 3%.	BE5
Concentration of takeaways and proximity of takeaways to secondary schools and further education establishments.	Proportion of units in use as takeaways in town centres not to exceed 6%, and no further takeaways within 400 metres or a secondary school or further education establishment.	BE5
Proximity of shisha cafes to secondary school or further establishments.	No further shisha cafes consented within 400 metres or a secondary school or further education establishment	BE5
Number of Visitor Rooms Built	2622 rooms 2015-40	BE9
Number of Buildings on the Buildings at Risk Register	Less than 5	BHC1
Number of public houses lost and not replaced by development.	No loss of viable public houses.	BHC5
Loss of Category A Tree Preservation Order Trees	None	BGI4
Change in Community Infrastructure Floorspace (Schools, Healthcare, Other Community Space, Cultural and Leisure Facilities).	None	BSI1
Delivery of Site Allocations	Delivery in line with timescales identified in the Local Plan	Site Allocation References



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## APPENDIX 1

### 8.1 STATUS OF EXISTING BRENT LOCAL PLAN POLICIES WITHIN THE CORE STRATEGY ADOPTED 2010, SITE SPECIFIC ALLOCATIONS DOCUMENT ADOPTED 2011, WEMBLEY AREA ACTION PLAN ADOPTED 2015 AND DEVELOPMENT MANAGEMENT POLICIES PLAN ADOPTED IN 2016

**8.1.1** Once adopted, the policies in this version of the Local Plan will replace the majority of 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.

<b>Brent Core Strategy 2010</b>	
Policy Reference	Status
All Policies	Superseded
<b>Site Specific Allocations Document adopted 2011</b>	
Policy Reference	Status
All Policies	Superseded
<b>Wembley Area Action Plan adopted 2015</b>	
Policy Reference	Status
All Policies	Superseded
<b>Development Management Policies Plan adopted in 2016</b>	
Policy Reference	Status
DMP2, DMP3, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP14, DMP15, DMP16, DMP17, DMP18 and DMP20	Superseded
DMP1	Referenced the same
DMP4	Now referenced BE6
DMP4a	Now referenced BE7
DMP5	Now referenced BE8
DMP7	Now referenced BHC1
DMP13	Now referenced BT3
DMP19	Now referenced BH13
DMP21	Now referenced BH5

## APPENDIX 2

### 8.2 LONDON PLAN DESIGN POLICY AND BRENT SPD1 DESIGN PRINCIPLES

London Plan policy (amended Jul 2018)	SPD1 guidance (adopted Nov 2018)	SPD1 principles	London Plan policy
D1 London's form and characteristics	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D1, D8, G1
	3.1 Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D1, D4, D8
	3.2 Animated facades	Development should ensure active frontage and maximise doors and windows to active ground floor rooms.	D1, D4,
	3.3 Urban grain	New development should respect existing urban grain and human scale.	D1,
	3.4 Roofscape	Building roofs should be designed to minimise the impact of height and positively respond to the character of the area.	D1,
	3.5 Proportions	Buildings, including window dimensions and void-mass ratio, should be well proportioned; respecting local character.	D1
	3.6 Building materials	Building materials should be durable, attractive and respect local character.	D1
	4.1 Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D4, D7
	4.2 Parking	New developments should provide a suitable amount of parking in a mix of parking solutions that are convenient, efficient and facilitate good urban design.	D1, D7
	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D7, G5, G7
	4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D7, G5
	4.5 Public realm	Street design and public realm should reflect the street hierarchy and accommodate for movement and the street as a place accordingly.	D1, D7
	4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D7, G1



D4 Housing quality and standards	3.1 Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D1, D4, D8
	3.2 Animated facades	Development should ensure active frontage and maximise doors and windows to active ground floor rooms.	D1, D4
	4.1 Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D4, D7
	5.1 Privacy and amenity	New development should provide adequate privacy and amenity for new residents and protect those of existing ones.	D4
	5.2 Private outdoor space	New development should provide good levels of private outdoor space and well-designed communal amenity space for new residents.	D4
	5.3 Bins and bike storage	Services, bin and bike storage, should be designed as part of the building envelope wherever possible; minimising visual impact on the streetscene.	D4
	5.4 Space standards	New development should provide adequate space, access and orientation and adhere to the relevant space standards.	D4
	5.5 Lighting and noise	Buildings and spaces should be designed to minimise potential noise and light pollution.	D4
D7 Public realm	4.1. Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D4, D7,
	4.2 Parking	New developments should provide a suitable amount of parking in a mix of parking solutions that are convenient, efficient and facilitate good urban design.	D1, D7,
	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D7, G5, G7
	4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D7, G5
	4.5 Public realm	Street design and public realm should reflect the street hierarchy and accommodate for movement and the street as a place accordingly.	D1, D7,
	4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D7, G1
D8 Tall buildings	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D1, D8, G1
	3.1. Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D1, D4, D8
G1 Green infrastructure	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D1, D8, G1
	4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D7, G1

G5 Urban greening	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D7, G5, G7
	4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D7, G5
G7 Trees and woodlands	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D7, G5, G7

## APPENDIX 3

Year	19/20-23/24	24/25-28/29	29/30-33/34	34/35-40/41	Total
Dwellings	14,072	9,639	11,070	6,312	41,093
Average Per Year Over Period	2,814	1,928	2,214	902	1,868
Year		19/20-28/29		29/30-40/41	
Dwellings		23,711		17,382	41,903
Average Per Year Over Period		2,371		1,449	1,868

## APPENDIX 4

### 8.4 PARKING STANDARDS

#### Employment Use Classes

- 8.4.1** The employment areas in Brent have significant variations in levels of access to public transport and other individual characteristics. Where parking is proposed, the following standards, as detailed in Table 1, should be applied. A distinction is made between areas of the borough to the north and the south of the Dudding Hill railway line as this broadly reflects variations in public transport provision.
- 8.4.2** The provision of parking in new developments below the standards set out in the table is encouraged (see car free/car capped section). The provision of parking at a higher level than provided by these standards, but in accordance with the London Plan standards for B1 uses, would need to be justified through a Transport Assessment, and recognise future PTAL ratings.

LOCATION	DEFINITION	MAXIMUM PARKING STANDARD
Inner Brent	South-east of Dudding Hill railway line	1 space per 800m <sup>2</sup> gross floor space
Outer Brent	North-west of Dudding Hill railway line	1 space per 200m <sup>2</sup> gross floor space
Regeneration exceptions	Opportunity and growth areas	1 space per 100m <sup>2</sup> gross floor space

**Table 1 - Employment Maximum Parking Standards**

**8.4.3** The regeneration exception will be subject to a transport assessment verification. Developments in the growth areas and opportunity areas may be permitted more parking to encourage the sustained regeneration of these areas. Developments in these areas will be permitted to use the regeneration exception standard for outer London Boroughs, so long as this is justified through a transport assessment.

**8.4.4** More generous parking than that set out in the table above could be acceptable provided that **all** of the following criteria can be demonstrated:

- **Ensuring that there are no significant adverse impacts on congestion or air quality**
- **A lack of existing on or off-street parking spaces**
- **A commitment by the developer to provide space for electric and car club vehicles, bicycles and parking for disabled people above the minimum thresholds; and**
- **A binding commitment via a Travel Plan to reduce more generous provision over time.**

### **Retail Parking Standards**

**8.4.5** Parking standards as set out in the London Plan policy T6.3 apply in Brent.

### **Residential Parking Provision**

**8.4.6** Parking standards as set out in the London Plan policy T6.1 apply in Brent.

### **Parking for Hotels**

**8.4.7** The following standards will be applied to hotels:

- **PTAL 4-6: Operational and disabled parking provision only, with minor exceptions where warranted.**
- **PTAL 1-3: Additional parking allowable up to 1 space per 5 bedrooms if justified by a transport assessment.**
- **One coach parking space should be provided for every 50 75 bedrooms.**

**8.4.8** Only operational and disabled parking should be provided for new hotels in the Major Town Centres of Wembley and Kilburn.

### **Parking for Residential Institutions Hospitals**

**8.4.9** For hospitals, these should be assessed individually due to the differing nature of the parking demands depending on the range of treatments offered. There will be a higher level of operational parking required than for other large institutions. A Travel Plan should be developed to ensure that visitor and employee parking is managed. Where existing hospitals are subject to developments or refurbishment, the existing levels of parking should be the starting point, with any additional requirements justified through a transport assessment.

### **C2 (Other Residential Institutions)/ C4 (Houses of Multiple Occupation)**

**8.4.10** Other residential institutions such as care homes, homeless hostels, halls of residence and residential schools and colleges and houses of multiple occupation should base the parking provision on the number of bedrooms with a maximum standard of one space per 10 beds. Further visitor parking may be acceptable provided adequate justification is provided through a Transport Assessment. Where the development is for the provision of student halls of residence, in line with recent consented schemes, we will seek car free schemes, due to the low levels of car ownership amongst students.

## Parking for non-residential institutions (D1)

**8.4.11** This category covers places of worship, health centres, nurseries and museums, all with varying parking requirements. For all D1 uses, up to 1 car parking space may should be provided per 10 users/visitors on site at any one time. However, for developments situated in high PTAL locations, parking provision should be justified by a transport assessment. Longer stay visitor parking should be deterred.

**8.4.12** A separate standard applies for schools:

- **PTAL 1-3: one car parking space per 5 staff; and**
- **PTAL 4-6: operational and disabled provision only, unless otherwise justified through a transport assessment**

## Parking for Assembly and Leisure

**8.4.13** This category covers cinemas, bingo halls and theatres along with leisure centres, swimming pools and gymnasiums.

**8.4.14** In locations with PTALs of 4-6, on-site provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches and deliveries/ servicing. In locations with PTAL of 1-3, provision should be consistent with objectives to reduce congestion and traffic levels and to avoid undermining walking, cycling or public transport.

**8.4.15** Applicants are encouraged to make use of existing publicly available parking spaces before making on-site provision. Where on-site provision is required, it is proposed that up to 1 car parking space is provided per 10 users/visitors on site at any time. Where venues provide a total capacity over 500 patrons, it is proposed that the level of parking is determined on an individual basis, subject to a detailed transport assessment.

## Disabled Parking

**8.4.16** Disabled parking standards as set out in the London Plan policy T6.1 for residential and T6.5 for non-residential apply in Brent. Council car parks will provide spaces in line with best practice standards.

## Cycle Parking

**8.4.17** Cycle parking standards as set out in the London Plan policy T5 apply in Brent.

# APPENDIX 5

## 8.5 SERVICING STANDARDS

### A1 Retail

**8.5.1** For A1 retail units less than 500m<sup>2</sup> gross floor area, one transit sized bay for service vehicles should be provided. Food retail units of over 500m<sup>2</sup> should provide 12m bays for servicing. For larger A1 retail units over 2000m<sup>2</sup>, one full size lorry bay per 2000m<sup>2</sup> for service vehicles should be provided.

**8.5.2** If the development forms part of a group of smaller units, the total floor area of the entire groups of units should be used to determine the number of service vehicle bays. Existing service facilities should also be taken into account.



### **A3 Food and Drink Establishments**

**8.5.3** Standards should be provided on a site specific basis, depending on the size of service vehicles and each location.

### **B1 Business**

**8.5.4** For units under 100m<sup>2</sup> one transit sized bay for service vehicles should be provided. Units over 100m<sup>2</sup> should provide service space only for 8m rigid service vehicles, as opposed to full sized (10m) rigid vehicles at each location.

### **B2 General Industry and B8 Warehouse**

**8.5.5** Units under 300m<sup>2</sup> should provide a loading bay that can accommodate an 8m rigid vehicle. Units between 300m<sup>2</sup> and 1000m<sup>2</sup> should provide a loading bay for 10m rigid vehicles. Beyond 1000m<sup>2</sup>, there should be provision of full- sized 16.5m loading bays.

### **C1 Hotels**

**8.5.6** In addition to the coach parking provision standards, new hotel developments should also provide a loading bay for at least one 8m sized rigid vehicle. Any specific sites with alternative requirements should be reviewed separately

## **APPENDIX 6**

### **8.6 STRATEGIC POLICIES IN THE NEW BRENT LOCAL PLAN FOR THE PURPOSES OF NEIGHBOURHOOD PLANNING**

**8.6.1** The NPPF requires Plans to make it explicit which are strategic policies

Strategic Policies	Non-Strategic Policies
DMP1, BP1, BP2, BEGA1, BEGA2, BP3, , BP4, BNWGA1, BP5, BP6, BP7, BD1, BD2, BH1, BH2, BH3, BH4, BH5, BH6, BH7, BH8, BH9, BH10, BH11, BH12, BH13, BS11, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BT1, BT2, BT3, BT4	BCSA1, BCSA2, BCSA3, BCSA4, BCSA5, BCSA6, BCSA7, BCSA8, BCSA9, BCSA10, BCSA11, BCSA12, BCSA13, BCSA14, BCSA15, BCSA16, BCSA17, BESA1, BESA2, BESA3, BESA4, BNSA1, BNSA2, BNSA3, BNSA4, BNSA5, BNSA6, BNSA7, BNWSA1, BSSA1, BSSA2, BSSA3 BSSA4, BSSA5, BSSA6, BSSA7, BSSA8, BSSA9, BSSA10, BSSA11, BSSA12, BSSA13, BSSA14, BSSA15, BSSA16, BSSA17, BSSA18, BSSA19, BSESA1, BSESA2, BSESA3, BSESA4, BSESA5, BSESA6, BSESA7, BSESA8, BSESA9, BSESA10, BSESA11, BSESA12, BSESA13, BSESA14, BSESA15, BSESA16, BSESA17, BSESA18, BSESA19, BSESA20, BSESA21, BSESA22, BSESA23, BSESA24, BSESA25, BSESA26, BSESA27, BSESA28, BSESA29, BSESA30, BSESA31, BSESA32, BSESA33, BSESA34, BSWSA1, BSWSA1, BSWSA2, BSWSA3, BSWSA4, BSWSA5, BSWSA6, BSWSA7, BSWSA8, BSWSA9, BSWSA10, BSWSA11, BSWSA12, BSWSA13, BSWSA14, BSWSA15 and BSWSA16

## APPENDIX 7

### 8.7 GLOSSARY

**Accessibility Management Plan:** A plan which sets out how accessibility and inclusion will be monitored and maintained throughout the life of a development.

**Adult Gaming Centre:** An adult gaming centre is a place of gambling where access is restricted to persons over 18.

**Affordable housing:** defined by Government in the NPPF 2018 as: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a. **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- a. **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- a. **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- a. **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

**Air Quality Management Area (AQMA):** An area which a local authority has designated for action, based upon a prediction that Air Quality Objectives will be exceeded.

**Betting Shop:** A store where the primary activity on the premises is betting services. Each premises is permitted to have up to four gaming machines, known as fixed odds betting terminals.

**Compulsory Purchase Order (CPO):** A legal function that allows certain bodies which need to obtain land or property to do so without the consent of the owner.

**Decentralised Energy Network:** the local generation of electricity and where appropriate, the recovery of the surplus heat (combined heat and power – CHP) for purposes such as building space heating and domestic hot water production.

**Forecourt Trading:** trading from a designated area which is connected to the frontage of a shop and either on the public footway or private land. Also known as street trading.

**Greenfield Run-off Rates:** The rate of run-off that would occur from the site in its undeveloped and therefore undisturbed state.

**Green roof:** Also known as an eco-roof, living roof, or vegetated roof, is one that is either partially or completely covered in vegetation on top of the human-made roofing structure.

**Heavily Parked Street:** Streets where the percentage of cars parked on-street exceeds 80%, the safe and legal maximum level of parking.

**Live- Work Premises:** Purpose-built premises, or purposely converted units, comprising a mix of residential and business uses which cannot be classified under a single class within the Use Classes Order.

**Local Employment Sites:** Sites, outside of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), which provide, or are capable of providing, local employment opportunities. These sites include those on the fringes of SIL and LSIS, scattered large sites and smaller sites dispersed throughout the borough including those in residential areas.

**Locally Significant Industrial Sites (LSIS):** Employment sites identified in the Core Strategy as being of significance to Brent's economy. Occupancy within these sites is generally similar to that within SIL, but is more varied and may include office or trade uses.

**Lifetime Neighbourhood:** Places where, in view of an ageing society, transport, basic amenities, green spaces, decent toilets, and places to meet and relax, are consciously planned for people of all ages and conditions in mind within easy reach of homes, accessible to all and planned into proposals at the outset.

**Major Developments:** 10 or more residential units (or if a number is not given, where the area is more than 0.5 hectares), or 1000 sq m (or more) gross commercial floorspace.

**Main Town Centre Uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Meanwhile Uses:** The temporary use of vacant buildings or land for a socially beneficial purpose until such a time that they can be brought back into commercial use again.

**Metropolitan Open Land:** MOL are strategically important open spaces to London. MOL performs 3 valuable functions:

- to provide a clear break in the urban fabric and contribute to the green character of London;
- to serve the needs of Londoners outside their local area; and
- contains a feature or landscape of national or regional significance. MOL is afforded the same level of protection as the Green Belt and the London Plan stresses that there should be a presumption against development in these areas.

**Neighbourhood Parades and Isolated Shop Units:** Neighbourhood Centres and isolated units are located outside of designated town centres. These shops serve a local retail need and play an important social role in the community as well as contributing to the character and function of the local area.

**Open Space:** All land in Brent that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a the

broad range of types of open space, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

**Opportunity Areas:** Areas designated in the London Plan as London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing.

**Pawnbroker:** A store which offers loans in exchange for personal property as equivalent collateral. In Brent many of these stores also provide a payday loan service.

**Payday loan shops:** A company that lends customers small amounts of money at high interest rates, on the agreement that the loan will be repaid when the borrower receives their next wages.

**Playing Field:** A playing field is an area containing at least one playing pitch (0.2 ha or more, including run-offs), irrespective of ownership.

**Playing Pitches:** A playing pitch means a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015).

**Primary Frontages:** Frontages comprising a high proportion of retail uses which may include food, drinks, clothing and household goods. Primary frontage is shown on the Polices Map.

**Primary shopping area:** Defined area where retail development is concentrated..

**Public Transport Accessibility Level (PTAL):** A detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability.

**Quiet Areas:** The Environmental Noise (England) Regulations 2006 (as amended) require that Noise Action Plans for agglomerations (including much of Greater London) include provisions that aim to protect any formally identified 'Quiet Areas' from an increase in road, railway, aircraft and industrial noise.

**Secondary Frontage:** That part of a shopping centre outside the primary frontage, usually on the fringe, where units provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses. Secondary frontage is shown on the Polices Map.

**Section 278 Agreement:** A legally binding agreement between the Local Highway Authority and the developer to ensure that the work to be carried out on the highway is completed to the standards and satisfaction of the Local Highway Authority.

**Small and Medium Enterprises (SMEs):** Defined in EU law as enterprises which employ fewer than 250 people and which have an annual turnover not exceeding €50m, and/or an annual balance sheet total not exceeding €43m.

**Social Infrastructure:** A wide variety of services that are essential to the sustainability and wellbeing of a community such as education facilities, places of worship, health provision, community, cultural, recreation and sports facilities.

**Strategic Industrial Location (SIL):** These exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including general and light Industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.

**Studio Flat:** Also known as a studio apartment, a small apartment which combines living room, bedroom, and kitchenette into a single room.

**Sustainable Urban Drainage System (SuDS):** An alternative approach from the traditional ways of managing runoff from buildings and hardstanding. They can reduce the total amount, flow and rate of surface water that runs directly to rivers through stormwater systems.

**Transport for London Route Network (TLRN) Road:** The Transport for London Route Network is made up of roads that are owned and maintained by Transport for London (TfL). They are the key routes or major arterial roads in London.





