

Survey:

What is your name? STRA Planning Department

What is your organisation (if applicable)? Sudbury Town Residents Association and Neighbourhood Forum

1. Which part of the Plan are you commenting on?

Policy: Paragraph: Table: Map:

2. Do you consider the Plan is:

Legally compliant? Yes: No:

Sound? Yes: No:

3. If you believe the Plan to be unsound, is this because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

4. Please give reasons for your objection or support:

Sudbury Town Residents Association and Neighbourhood Forum conducted a survey of the Neighbourhood Forum Area. The survey asked those who live and work within the Neighbourhood Forum Area, whether they support the Sudbury Town Neighbourhood Plan or the Draft Local Plan. Sudbury Town Residents' Association and Neighbourhood Forum Volunteers walked door to door on the High Streets and residential roads seeking opinions. More than 319 persons living or working within the Neighbourhood Forum Area expressed their opinion and 100% of those surveyed support the Sudbury Town Neighbourhood Plan, 0% support the Draft Local Plan. If required, STRA can submit a copy of this Survey.

STRA Planning have reviewed the Draft Local Plan document for the South West Area of Brent and have many concerns that the Draft Local Plan is not positively prepared, not justified, not effective and inconsistent with National Policies. In addition, the Draft Local

Plan is not consistent with the Sudbury Town Neighbourhood Plan, which is a planning policy for 10 years.

Brent is pursuing a housing allocation (35,000) in excess of the allocation it has previously supported or sought to agree with the Mayor (29,500 or 24,000).

Support for demolition of 2-3 storey homes and commercial properties and replacement with 5-7 storey buildings in Intensification Corridors is in conflict with the Sudbury Town Neighbourhood Plan ("STNP").

Any policy which supports development of Vale Farm as a regional centre for sports excellence is in conflict with STNP Policy VF1.

The classification of A404 Harrow Road, Watford Road and Ealing Road as principal movement corridors, is misleading. The roads are not wide and do not have the space for increased density. The classification and description of these roads is being used as a justification for the Intensification Corridors. The roads are often heavily congested. Bus and emergency services often have difficulty passing through. Therefore, the justification is false.

South West 5.7.9 states: There are three town centres; Wembley (part), Sudbury and Ealing Road. Wembley is the largest town centre in Brent.

Sudbury Town is a Local Centre not a Town Centre. This incorrect classification as a Town Centre is being used as a justification for Intensification Corridors.

South West 5.7.11 states: Sudbury is a smaller high street largely comprised of smaller units with the main anchor being a Tesco Express. It essentially meets local needs. Sudbury & Harrow rail station is located within the town centre boundary, with 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.**

The small High Street of Sudbury Town has a high retail frontage vacancy rate but one of the highest proportions of night-time economy uses. This statement is contradictory.

The Sudbury Town Neighbourhood Plan does not support multiple betting shops, 24-hour fast food outlets and 24-hour liquor licences. It is well documented that such services destroy the High Street, making them unpleasant environments.

The current night-time economy is solely based on the services of betting shops, 24-hour fast food outlets and 24-hour liquor licences. These are leading to the degradation of the High Street and anti-social behaviour. To base new development upon a serious issue in Sudbury Town is wholly unacceptable.

POLICY BP7 SOUTH WEST states:

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

CHARACTER, HERITAGE AND DESIGN states:

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 BD2) 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 where around 15 metres (5-storeys) could be appropriate and Sudbury and Ealing Road town centres where around 15-18 metres (5-6 storeys) could be appropriate.

This part of the Policy is confusing and contradictory. Sudbury Town Neighbourhood Plan page 46 clearly states that development should not be greater than 2-3 storeys high to retain the low-rise character of Sudbury Town. This includes the High Street. The Council has ignored STRA and our Neighbourhood Forum Petition signed by 517 persons, who objected to Intensification Corridors along the Harrow Road, Watford Road and Bridgewater Road in January 2019. The Council has continued to propose this for the Sudbury Town area against the vote of the those that live and work within the Neighbourhood Forum Area.

COMMUNITY AND CULTURAL FACILITIES

n) Improvement and enhancement of the Vale Farm and its Sports Centre

This statement undermines the Sudbury Town Neighbourhood Plan Policy VF1:

.....Improvements to Vale Farm should not result in the loss of green or open space. Change of use and development other than for uses which support recreation, sporting and amenity use will not be permitted at Vale Farm.

Therefore, there should be no development on Vale Farm other than for the purpose of improvement of sports facilities. Brent has the highest obesity in the whole of the UK. We need our sports land to encourage our children to lead healthy and active lives and the Sudbury Town Neighbourhood Plan protects this land from development.

South West 5.7.15 states: Outside these regeneration areas building height will be more reflective of the local context. Town centres (around 18 metres 6 storeys) and intensification corridors (around 15 metres/ 5 storeys) will provide the opportunity for some additional height. Elsewhere development will be expected to come forward at levels not significantly higher than existing two and three storey developments.

Sudbury Town is not a Town Centre but a Local Centre, therefore this does not apply.

The Council have ignored the Sudbury Town Neighbourhood Plan guideline on page 46:

....proposals for any new development be in the order of two to three storeys high.

OTHER SITE ALLOCATIONS

BSWSA 12 Keeler's Service Centre, Harrow Road, Wembley, HA0

STRA Neighbourhood Forum objects to the inclusion of this site in the Draft Local Plan's Site Allocation list. The Planning Application for demolition of Keeler's Garage and development of a 5-7 residential block has been **Called-In** by Sudbury Town Residents Association and Neighbourhood Forum. We are currently awaiting the Secretary of State's Decision.

The allocation is contrary to the retention of Industrial space and the proposed Policy BP7 SOUTH WEST e) *.....ensures no net loss of industrial floorspace .*

BSWSA 14 Sudbury Town Station car park 0.22 Car park Residential 30

Those that live and work within the Sudbury Town Neighbourhood Forum Area have overwhelmingly objected to the loss of this car park and residential development.

This is also contrary to the Equalities Act and gives inadequate provision to Disabled persons.

Development should protect and enhance the setting of the Grade II* listed Sudbury Station. Suitable levels of replacement car parking for disabled station users must be retained.

5. What change(s) do you consider necessary to make the Plan legally compliant or sound?

In order to provide some information to the Secretary of State, STRA suggests the following:

Removal of any reference to development of Vale Farm to be compliant with the Sudbury Town Neighbourhood Plan Policy VF1. Brent has the highest obesity levels in the UK and we need to save our sports land and encourage people to lead healthy and active lives. Removal of Intensification Corridors from the Plan regarding Sudbury Town. Removal of the allocation of the Keelers' Site and removal of the allocation of the Sudbury Town Station Car Park site. Correction of the definition of Sudbury Town as a Town Centre to read a Local Centre. Clarification that the Night-time economy of Sudbury Town has been created by incorrect licensing of betting shops and 24-hour retail liquor licenses and 24-hour fast food outlets, creating an unpleasant and anti-social environment. These are contrary to the Sudbury Town Neighbourhood Plan. A commitment to remove the inappropriate licensing and encourage sustainable Ground Floor Space use in the High Street in line with Sudbury Town Neighbourhood Policies TCU1 and TCD1. Brent's Tall Building Strategy is not community-led; it is development and profit-led and disregards the Sudbury Town Neighbourhood Plan. A statement that the Tall Building Strategy will not apply in Sudbury Town.

Economy and Town Centre Policy should not apply because Sudbury Town is a Local Centre not a Town Centre. There is a shortage of Secondary Schools currently and the increase in residential units will only exacerbate the problem. The Council are responsible for school placements but have no Secondary Schools.

Brent's design policies do not have regard to the STNP. Brent Policies BH2 and BH4 are contradictory. Brent Policy BH7 could lead to HMOs, without providing for families and Policy BH13 is not justified.

The above is a brief summary of some of the major issues with the Draft Local Plan in its current state. However, to satisfactorily ensure that the Draft Local Plan is compliant with National, London and the Sudbury Town Neighbourhood Plan, STRA should be present at every EiP to explain and justify in detail the objections made here, without prejudice or limitation.

If this is not permitted and not facilitated, it will undermine the intentions of the Localism Act, all Neighbourhood Forums and all Neighbourhood Plans. This will have an impact on all Planning across the UK.

6. If your representation is seeking a change, do you wish to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Draft Local Plan is immensely detailed and small changes in the wording or contradictory statements will have a huge impact and ramifications on the Sudbury Town Neighbourhood Plan and planning in the Sudbury Town Neighbourhood Forum Area for the next 10 years. We seek representation at all EiP meetings in order that the Sudbury Town Neighbourhood Plan is in no way undermined or comprised.

If you would like to comment on additional policies, please fix another sheet to this.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.

√ Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.