

From: John Cox
To:
Subject: BRENT Reg19: Suggested formatting and general corrections
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Reg19: Suggested formatting and general corrections

(You suggested that I separated these sorts of comments into a separate submission.)

(1) The PDF file, the **“Local Plan (whole document)”** should be reformatted as single A4 landscape pages, not mostly double-page spreads.

Although there are 400 real pages, there are only 218 PDF pages. It is impossible to go to a particular real page number (because you do not know where to go) or to print a single page.

The PDF’s ‘Contents’ list (called ‘Bookmarks’ by Adobe Reader) misses labelling some of the sections and has items with ‘Part’ numbers in their names that do not correspond to the document section numbers.

Also, all of the Contents item names start with the long word string:

“8365 Local Plan A4 landscape – Part”

which in practice means they all look identical on screen.

Some of the Contents item names also have unnecessary version numbers.

(2) The menu page for the **“Individual sections for smaller download”** ought to have the section numbers included in the titles of the various images.

For instance, the wording on the menu page for:

“Central Place”

should change to:

“5.1 Central Place”

but that one specific example should change further, to

“5.1 Central Place (and Places map)”.

Annoyingly, there is no direct ‘one level back’ from the menu page to the **“Shaping Brent’s Future Together”** page, because for some reason you have dropped two structure headings within the purple banner at the top.

Presumably the headings list will wrap around successfully in any browser if it is more than one line long, so don’t drop them.

All those 21 section PDF files should be reformatted as single A4 landscape pages, not mostly double-page spreads.

They should also have their PDF page numbers coinciding with their real page numbers (which the PDF file format easily allows).

For instance, the **“5.3 North Place”** should not have PDF page numbers of ‘1 to 15’, but ‘103 to 130’ instead.

(3) There is one **“Section 6.2”** on pages 281 and another **“Section 6.2”** on page 329.

One Section 6.2 is enough, thank-you.

(4) The Appendices:

Every Appendix should have a narrative paragraph that describes what it is achieving (some do).

That description should also refer to what sections in the Local Plan they are appendices of.

(Appendix 2 already does in its title.)

The alternate light-green, dark-green, light-green colour banding in all appendices ought to start with a dark-green, not a light one (as is does in Figure 39).

That banding is confusing in Appendix 1 and Appendix 3.

To solve that, add a narrow white strip after lines 3, 6 and 9 in the former and after line 3 of the latter. Then start the banding scheme afresh (which means with dark-green) for the lines that follow the white strips.

All words on the first line of each appendix table (plus, where appropriate from the

above comments, for lines 4, 7 and 10) should be changed to bold text (as it is in Figure 39).

(5) Figure 3 is completely unclear and also needs some colouring. Look what other boroughs do, since it is a standard Local Plan graphic. Paragraph 2.3 claims it shows the hierarchy. It doesn't.

In paragraph 2.4, change "has" to "have".

(Can't you grammar-check the whole document?)

Paragraph 2.5 and elsewhere should quote the Consolidated Version of the Draft New London Plan of July 2019.

Shouldn't you mention the London Plan Panel's recommendations, particularly on housing numbers?

Are all references of London Plan policies in your Local Plan and Appendices compatible with the July 2019 version?

Long lists of London Plan policy numbers within individual cells of tables of the Appendices should be in alphabetical order.

(6) All subheadings throughout the Local Plan must be in blue text.

Some are not (for instance, two on page 336).

(7) Much of the Local Plan consists of a blue tinted box containing a numbered "POLICY", followed by a series of subheadings beginning with "JUSTIFICATION".

The golden rule should be that:

No subheading or text of any Policy should proceed the Policy on the page.

Compliant examples of that rule are **single-column** Policy boxes on page 303, and the **double-column** Policy box on page 336.

An example of a failure for a **single-column** Policy box is on page 305.

That must be corrected by swapping over the Policy BH12 box and the subheading "APPLICATION INFORMATION" below it, which belongs to the previous Policy BH11.

(Actually, since "LONDON PLAN" subheadings are meant to be last in a subsection, paragraph 6.2.93 ought to be moved before the "LONDON PLAN" one in the first column.)

Failed examples for **double-column** Policy boxes are on pages 315 and 340.

They should be rearranged as in your example on page 356 (or you may decide that is being too pedantic).

The clarity of that example of page 356 is helped by only having bold text across the two columns above the Policy box, and normal text below it. That would not be the case correcting the layout error on page 324. After moving the text around, a two-column horizontal rule above the Policy box would ensure the eye moved horizontally to reach the end of paragraph 6.4.45, rather than continuing down the centre column.

Finally, just when you think some of this is being too pedantic, where exactly does the associated text for Policy BSWGA1 on page 244 start?

I assume it starts at paragraph 5.7.30, but it needs a blue "JUSTIFICATION" subheading.

(To correct everything, move the Policy box to the start of page 245. Move all the text until the end of paragraph 5.7.29 backwards a page. Start 5.7.30 below its new subheading at the bottom of the first column on page 245, and flow the rest of the text, including over to page 246, where the moved primroses photograph can fill the first column.)

And where does the associated text for policy BNGA1 on page 116 start? Oh, two pages earlier, it seems.

(To at least partly correct this, crop the bottom of the photograph on pages 112 and 113, to move paragraph 5.3.39 on to the previous page. That deliberately results in a little white space at the bottom of the middle column of page 114. Then start the third column with a new horizontal rule. At least that will warn the reader something odd is going on. Then all is revealed on page 116.)

(8) Add a definition of "Intensification Corridor" to the Glossary. Mention necessary conditions like PTAL levels.

(9) Every Place has an identical and rather useless full page, merely saying "SITE ALLOCATION POLICIES".

Instead, and without losing that wording, you need a new page design that mentions the name of the Place, and also shows the title of each Site Allocation in a simple black-text on white-background list.

John Cox