

BRENT LOCAL PLAN PREFERRED OPTIONS CONSULTATION STATEMENT

October 2019



Contents

Executive Summary	4
Background	4
How did we undertake consultation?	4
How did people respond?	5
Comments about the consultation materials/process	5
Comments on the Spatial Portrait	6
Comments on Spatial Vision and Good Growth	6
Places	7
Central.....	8
East.....	8
North	9
North West.....	10
South	10
South East Place.....	11
South West.....	12
Themes	13
Design.....	13
Housing	13
Social Infrastructure.....	14
Economy and Town Centres	15
Heritage and Culture.....	15
Green Infrastructure	16

Sustainable Infrastructure	16
Transport.....	17
Integrated Impact Assessment (IIA).....	17
Appendix A	18
High Level Summary of Responses	18
Central	21
East.....	23
North.....	24
North West	26
South.....	27
South East	28
South West	30
Design	32
Housing.....	33
Social Infrastructure	35
Economy and Town Centres	36
Heritage and Culture	37
Green Infrastructure and Natural Environment.....	38
Sustainable Infrastructure	39
Transport	40
Delivery and Monitoring.....	42
Tall Building Strategy	42
Integrated Impact Assessment	43

Executive Summary

Background

The London Borough of Brent (the Council) has undertaken a series of consultation events from 8th November 2018 to 3rd January 2019 to allow for residents and stakeholders to comment on the Preferred Options draft Local Plan. The comments we received were then summarised for concision, and provided with a policy response from the Council.

The Preferred Options consultation follows previous stages of consultation on the draft Brent Local Plan. The first of these stages was an informal consultation in 2017, the processes and results of which are summarised in [Brent Local Plan Consultation Summary February 2018](#). In addition to this an Issues and Options Document was consulted upon in February – March 2018. The processes and results of this consultation are summarised in [Brent Local Plan Preferred Options Consultation Statement November 2018](#). The Local Plan will guide the future development of the borough where the council is the local planning authority to 2041 and on some sites possibly beyond. Old Oak and Park Royal Development Corporation are the local planning authority for bits of Brent in Park Royal and on railway land from the north circular road down to Willesden Junction station. They are adopting their own Local Plan which is in an advanced stage of preparation having been submitted for examination. The Brent Local Plan will replace the Brent Core Strategy, Brent Site Allocations Plan, Wembley Area Action Plan and Brent Development Management Policies plans.

All comments have been considered, with associated changes arising from each comment being found along with this document on the Shape Brent webpage. This document includes an executive summary of comments and changes which outlines the most significant changes, in addition to the more detailed high level summary of changes found in [Appendix A](#).

How did we undertake consultation?

The consultation was promoted under the brand Shape Brent using the following methods:

- Social media - Twitter, Facebook, Yammer using #shapebrent
- Leaflets and posters/roller banners in council buildings

- Posters in Park Notice Boards
- Exhibition and flyers at Stakeholder Events/ Drop in Sessions
- Emailing Local Plan and Community Database including list of Statutory Consultees, adjacent boroughs and those people who expressed an interest in being kept informed of the Local Plan
- Emailing Brent Citizen's Panel
- E-newsletter
- Promoting via Brent Connects mailing list
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent
- Main Council webpage and dedicated website www.brent.gov.uk/shapebrent
- Elected Members' News bulletin
- Promotional Video

There was a questionnaire to fill in and e-mail back or on-line. There was also an easy read and summary document to view. There was a launch session workshop at an early stage in the consultation period to which the Council invited major stakeholders/ community representatives and ward councillors who were in a position to make others aware of the consultation and encourage them to respond. There were four further workshops and drop in sessions at libraries/ community buildings undertaken at a variety of times and dates within the various 'Places' identified in the Plan. A separate developer/ landowner session took place.

How did people respond?

The public consultation events attracted approximately 185 people, producing 310 post-it comments. Willesden Green Library and Brent Civic Centre were by far the most popular venues, attracting 60 and 40 people respectively. In addition to this, the informal drop-ins attracted around 120 people. Aside from this, the majority of representations made were through our online survey, with 173 respondents. The remainder were submitted by email (86), with one by hand a petition of 537 signatures.

Comments about the consultation materials/process

Some residents complained that the Local Plan document is too long and technical to read or comment on. Some welcomed the Easy Read document and the simplified response forms were used by many respondents. The workshops were very well received. Some people wanted them to be longer than the 2 hour sessions with more time on the interactive element. In response to comments, the document's content has been reviewed and simplified where possible. Infographics have been added, with presentation improved to try to make it easier to understand. Better photos have been added that in most cases are more relevant to the subject

Comments on the Spatial Portrait

Comments were made on the clarity of the map of the borough and things to add/ take out. On the content, there were comments on specific matters. In terms of changes, the section has been retitled Brent Characteristics to reduce 'jargon', maps throughout the document have been amended to be more helpful and subject matter updated in part, e.g. older people's housing, on-line retailing.

Comments on Spatial Vision and Good Growth

There was generally strong support for the vision from both residents and developers. Single issue respondents wanted items included in the vision, e.g. health and well-being and climate change. On good growth topics there were detailed comments. For some Policy DMP1 didn't go far enough as it focussed more on minimum requirements rather than enhancement. In response the title has been changed from the 'jargon' of 'spatial' to 'development' vision. Reference has now been made to Health and Well-being in the Vision. DMP1 has been amended to seek enhancements where possible consistent with the National Planning Policy Framework on issues, including flooding, green infrastructure, ecological assets and heritage assets.

Places

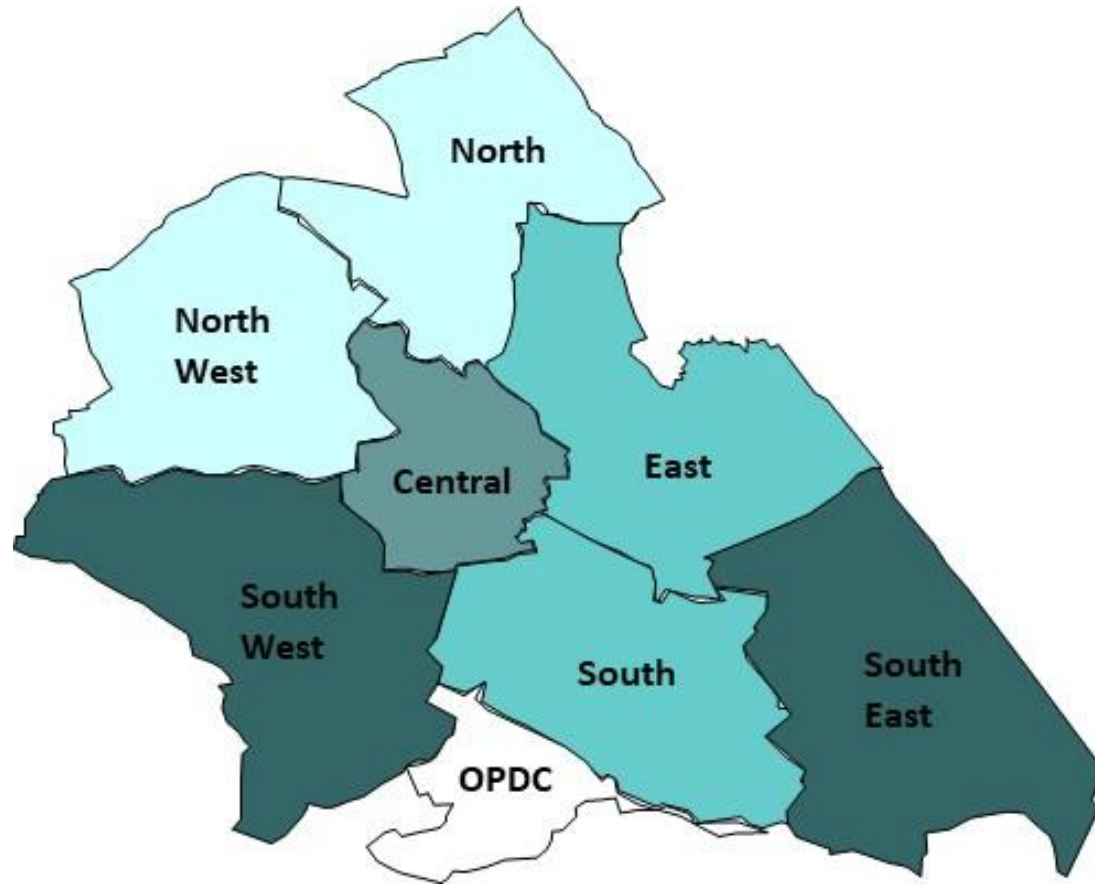


Figure 1: Comments received by place, with darker shades representing more comments.

Central

There were 73 comments on Central Place. This resulted in 30 changes to the document. There was a general opposition from many residents to further tall buildings in the Wembley Park area. This included those around the stadium and on proposed intensification corridors. Some residents were however open to developing tall buildings around stations. Quintain expressed their desire to develop tall buildings in high PTAL areas, not just those in close proximity to stations.

A key topic was green infrastructure. This included residents' support on delivery of a new park in the Wembley Park masterplan area, further planters and the naturalisation of the Wealdstone Brook, which the Environment Agency also supported.

With regards to sites, the general themes raised were: height, capacity, allocated uses and delivery timeframes, with comments coming from stakeholders including: land owners, Environment Agency, Sports England, United College Group, Thames Water, and the GLA. To provide more clarity in relation to Wembley a new Growth Area policy will be included, similar to that in the Core Strategy. A site allocation has been added for part of the Wembley Park underground station site as a result of representations from TfL Commercial. Some sites have had their residential capacity and delivery timings amended as a result of representations received, mostly those of Quintain. Other than this, there were no significant changes to this chapter, with all changes being minor wording amendments.

East

There were 58 comments on East Place. This resulted in 23 changes to the document. There was general support for the allocation and redevelopment of both the Neasden and Staples Corner growth areas. Residents do not agree with the proposed heights at Neasden. Quintain (college site preferred developers) however see the heights as too conservative. They wanted to see greater flexibility given the potential for transformation. Amafhh Investments (landowners at Staples Corner) also consider proposed heights for Staples Corner as too limiting, particularly in the context of those granted permission across the North Circular at Brent Cross.

In addition to this, a number of stakeholders see the requirement for a masterplan as something which will cause delay in delivery. They would rather the Neasden site be broken down into smaller components to expedite delivery. Quintain and the United College Group see this as a particular problem for the delivery of the College of North West London site, due to their more immediate plans for providing a new college building in Wembley Park. The council still wants to pursue a masterplan approach, partly to be consistent with emerging London Plan policy for proposed redevelopment of industrial land, but also to ensure an efficient and effective use of land is delivered. Aggregate Industries were concerned about the impact of potential residential at Neasden on their activities. The allocation has been amended to give greater emphasis in this regard. TfL Commercial however urged caution on the extent to which the West London Orbital could be relied upon in delivery terms. In this respect additional viability work has been undertaken and TfL continue to support the Orbital through its next stages of becoming a confirmed project. Funding to deliver the scheme still however is a significant hurdle to overcome.

The GLA expressed the need to increase intensification of industrial uses and how this will not be possible through co-location on Strategic Industrial Land. Further dialogue has occurred with them with an agreed approach to the masterplanning of Staples Corner so that they can see proper consideration of London Plan policies occurs. Barnet have expressed their interest in tailoring the existing Brent Cross masterplan. This is so that it works to ensure greater connectivity to the Staples Corner area, reduces existing severance created by the North Circular and increases potential PTAL levels giving greater accessibility to the new Brent Cross station.

The Canals and Rivers' Trust are excited by the potential investment that redevelopment of Staples Corner can bring to the Welsh Harp. They see it as an opportunity to improve its environment and increase people's exposure to water. This, however, does bring with it potential concern also, with Natural England stating building heights must respond to the flight paths of migrating birds, and the Environment Agency stating the potential risk of flooding in Neasden given its downstream position from the Brent Reservoir. There were no significant changes to this chapter, with all changes being minor wording amendments.

North

There were 34 comments on this place. This resulted in 6 changes to the document. Detailed suggestions from residents to help improve the North place included: weekly food market at Kingsbury High Road; limit betting shops; improving the leisure facilities; parking and dining options in Roe Green open space/Fryent Country park; promoting arts and community spaces; providing affordable housing for single person households; highlight Kingsbury's proximity to Wembley; improved bus route to Colindale Station and town centres; and secure a creative hub/community space to help integrate the community.

Residents raised concerns with regards to the proposed intensification corridors. This was due to perceived inappropriate heights, and the pressure which additional residents will place on existing social and transport infrastructure. The Department of Education supported reference to a potential new school. However, they would like to see this explicitly included within a site allocation. London Borough of Harrow support the visions for both Kingsbury and Burnt Oak. They would like to see further joint borough working. London Borough of Barnet support the designation of sites. They expressed the need for a joint approach considering their position in relation to the Colindale Growth Area. This in particular was related to building heights to ensure developments along the A5 do not become overbearing. TfL commercial support intensification corridors and the encouragement for development within town centres. They see 5/6 storeys as too limiting and would like to see reference to the intensification of high PTAL areas also, not just town centres.

Site allocations are supported by multiple stakeholders, however, they would like to see greater flexibility of uses, with residents agreeing to the retention of the supermarket but not to further retail delivery and believe affordable workspace would be more appropriate. The GLA have stated that due to Brent's status as a 'provide capacity' borough for industrial floorspace, the Burnt Oak/ Colindale Growth Area should ensure a net increase in employment floorspace. There is also concern regarding the need for a masterplan approach. Stakeholders suggested that due to multiple ownerships, sites should be allowed to come forward in a more piecemeal fashion, if it can be shown not to compromise the delivery of the remaining land. An additional residential site allocation has been made for Queensbury Station car park related to a

representation from TfL commercial. Other than this there were no significant changes to this chapter, with all changes being minor wording amendments.

North West

There were 42 comments on this place. It resulted in 10 changes to the document. There was general support for the place policy for this place (BP4 North West). Residents and LB Harrow were in favour of maintaining/ enhancing the areas Metroland heritage. TfL commercial would like for taller buildings to be considered within areas of high PTAL in addition to town centres, intensification corridors and Northwick Park. Residents are concerned over potential tall buildings in the Northwick Park growth area impinging upon the value of the park, nearby conservation areas, and views over to Harrow on the Hill. Residents were overwhelmingly in support of Northwick Park's protection. This support was also in reference to the retention and enhancement of local biodiversity, including Sites of Importance for Nature Conservation (especially Duckers Pool), trees and the local network of streams. LB Harrow welcome further discussions regarding Northwick Park growth area, ensuring their Duty to Cooperate on strategic matters. There resides a concern among residents that the allocation could result in an increase in congestion which could affect the ease of passage for emergency service vehicles. Sports England stated the need of reference to the undertaking of a Ball Strike Assessment for developments within the Northwick Park growth area, which has been included in the policy.

Apartments for London proposed the allocation of a site off of The Avenue, near Stanmore Junction. This has not been included primarily due to its designation as a SINC, but also for awkward shape and proximity to the Wealdstone Brook, railway, and homes. There were no significant changes to this chapter, with all changes being minor wording amendments.

South

There were 64 comments on this place. This resulted in 30 changes to the document. Residents in general supported the place policy (BP5 South). They approved of the greater focus on Church End, and the boosting of Harlesden's night-time economy/ creative industries through the improving connection with the OPDC via Willesden Junction station. There was also support for the need to reduce the severance caused by the North Circular within this place. The need for the provision of extra crossings and bridges was highlighted. It was also suggested that the area around Harlesden station should be included as an intensification corridor. However, the appropriate sites around this station have already been designated as site allocations. Neasden Temple have stated their desire to better serve the community. This will call for greater public transport links, and if supported could make better use of existing land, creating a community hub rather than sprawling car parks. Their proposal was to include an additional WLO station at Taylors Lane. Current feasibility studies are focussed on delivering stations at Neasden and Harlesden. The current funding gap for the Orbital means that additional stations will not be considered in the medium term.

IKEA were concerned about their site being identified as Strategic Industrial Land, which would limit their development options. Asiatic Carpets site owners were concerned their site allocation still specifies the requirement to increase industrial floorspace provision. They were also

concerned about the need for a comprehensive development of the wider allocation. Taking account of this the allocation has been amended to allow for the potential for the site to be developed in phases subject to it not undermining delivery of the rest of the site. Concern has also been raised on the need to re-provide the play space on the Dudden Hill Community Centre site. This has been amended with financial contributions toward the enhancement/ provision of off-site facilities being considered sufficient.

The Environment Agency stated that the Wembley Point site is designated functional floodplain and the allocation should better reflect this. The Department of Education are in strong support of the secondary school allocation for Chancel House. There were however concerns about its potential delivery sporting and recreation space serving the wider area. As a result of a response, the Crown Public House (long vacant) has now been included within the Willesden Green Bus Depot allocation. To reduce the document length some small allocations were renumbered and placed in a table, rather than having the fuller assessment. Other than this, there were no significant changes to this chapter, with all other changes being minor wording amendments.

South East Place

There were 93 comments on this place. This resulted in 34 changes to the document. There was a lot of support for the South East Place policy (BE6). Residents were in favour of the creation of a restaurant quarter around Kilburn Market (supported by the Theatres Trust and the Kensal Rise Residents Association), the delivery of affordable workspace, improvements to public realm along the west section of Willesden High Road, and measures to improve air quality along the A5 corridor. The delivery of a restaurant quarter did however spark some concern, with residents seeing the support of the night time economy as something which may cause disturbance. This has been addressed through reference to the 'agent of change' principle in the London Plan, and through proper spatial definition of the proposed area through our policies map. The Queen's Park creative quarter has also been mapped. This will improve support of local businesses, which has been seen positively by residents.

There was concern around the impact of tall buildings on neighbouring conservation areas. However, the council is confident any potential harm will be taken into consideration at application stages, with appropriate mitigation measures taken. Primary concerns around site allocations include the potential net loss of open space with the proposed land swap at Old Granville Open Space raised by the GLA, and the potential loss of a Multi-Games Use Area (MUGA) at the Kilburn Park Junior School. These concerns have been appropriately addressed through the inclusion of new wording to support no net loss of green space and the re-provision of the MUGA at the new school site. Other comments on sites regarded: consideration of neighbouring conservation area in Barnet, support for the redevelopment of poorly designed infill sites and the allocation of the Gaumont State Cinema for leisure and community uses. A new Growth Area policy has been included to cover the South Kilburn Growth Area, similar to that included in the Core Strategy. Other than this there were no significant changes to this chapter, with all changes being minor wording amendments.

South West

There were 100 comments on this place. This resulted in 28 changes to the document. There was strong opposition by many residents to the proposal of tall buildings within this place. The desire was to retain the general 2-3 storey character. This was made particularly evident by members of the Sudbury Town Residents Association (STRA). They objected to intensification corridors, including those overlooking Barham Park and the Keeler's Service Centre site allocation. STRA included within their comments objection toward the redevelopment of the Vale Farm site, misinterpretation of, and the need to set out the Neighbourhood Plan policy on this site. This was also subject to a petition of 537 signatures. This site had no development allocation, but wording has been included making it clear that Vale Farm is designated as a Local Green Space and that the Neighbourhood Plan supports recreational, sporting and amenity uses that strengthen the potential for Vale Farm as a regional centre for sporting excellence. Residents also objected the Sudbury Town station allocation due to the loss of parking spaces. The allocation has been retained with the re-provision of disabled spaces for station users.

Elsewhere there has been general support on site allocations from some residents and bodies including: TfL commercial, London Borough of Harrow, St. George and the Canals & Rivers' Trust (CRT). The London Hotel Group have helped identify a new site on Elm Road. This has resulted in an allocation for a mixed use residential led scheme. As Brent is a 'provide capacity' borough, the GLA has stated industrial floorspace must be increased on existing industrial sites allocated for development. The plan has now been amended to accommodate this requirement. Sports England have also noted the need to re-provide a gym on the Atlip Road Site to ensure no net loss.

The CRT have welcomed retention of site allocations along the canal. They appreciate the acknowledgment that the canal is a green chain which requires enhancement and can support greater active transport uptake. These sites now require developers to explore the opportunity of delivering boater facility hubs. Residents have expressed a desire for more bridges to increase permeability, which can be part satisfied by the delivery of a new bridge enabled by reserving land within the Northfields site. This will help improve connectivity for new developments on either side of the River Brent. A new Growth Area policy has been included to cover the Alperton Growth Area, similar to that included in the Core Strategy. Other than this and the new allocation for Elm Road there were no significant changes to this chapter, with all changes being minor wording amendments.

Themes

Design

There were 54 comments on this chapter. This resulted in 15 changes to the document. Much of comment on this chapter related to the tall buildings policy, including: areas identified as appropriate for tall buildings, proposed acceptable heights, and the intensification corridors. Residents were generally more opposed to the development of tall buildings, with developers seeing the policy and the Tall Buildings Strategy as too limiting, and not sound. Stakeholders including: Quintain, TfL Commercial, GLA, London Hotel Group, United College Group, and St. George all saw the policy as too rigid. They sought greater flexibility as to maximum heights and proposed tall building areas. To address this the policy should be worded more flexibly, proposing no maximum heights, considering applications on more of a case by case basis taking account of local character. Quintain stated that the evidence base for the policy (i.e. the Tall Building Strategy) is not sound. It needed to be supported with further townscape and heritage assessment. The vision has not followed through the recognition of the fact that the character of some parts of the borough will change to meet London Plan outputs.

Amafhh Investments (land owners at Staples Corner) support the designation of Staples Corner as a proposed tall building zone. They want greater maximum heights in response to the heights up to 100 metres allowed in the neighbouring Brent Cross development. To mitigate potential negative impacts of tall buildings, both the Canals and Rivers Trust and the Environment Agency wanted further wording acknowledging impacts on waterways, with greater setbacks necessitated by such development, relative to proposed heights. With regards to policy BD2 (basement development), there was a mixed response. Some supported the policy's need to mitigate potential harm, others saw it as a way of promoting more basement development. Historic England and the EA wish to mitigate harm by seeking further reference to archaeological heritage and flooding respectively. The tall building policy (BD1) has been amended to be slightly more flexible in approach. Whilst it seeks to provide clarity through identifying suggested heights for zones, quality and impacts on character are the main determinants of what is appropriate.

Housing

There were 162 comments on this chapter. They resulted in 36 changes to the document. A number of bodies commented on the target in policy BH1 being inconsistent with the draft London Plan. The GLA stated the need to provide sufficient sites to meet the draft London Plan target. Some residents are opposed to any further delivery and believe that it should be sought out of borough. The delivery target in the draft Plan has been revised to take account of likely deliverable sites, lack of identified capacity makes it still below the draft London Plan target. There was general support for policy BH2. St. George supported the allocation of new Growth Areas, Apartments for London state that high PTAL areas should be included, and Quintain objected to the requirement to re-provide commercial floorspace on the grounds of viability.

Policy BH3 (Build to Rent) has seen general opposition from residents due to its potential to produce a highly transient population with no stake in the local community. Other stakeholders support the policy in principle, however, find that it is too prescriptive in stating a threshold for which developers must then deliver. Some misinterpreted this policy, seeing the policy as to preclude the delivery of rented units on any schemes under 500 units. The GLA have expressed concern on the small sites policy BH4 as it is inconsistent with its approach of prioritising sites within 800m from a station/town centre boundary. Residents in general support the affordable housing policy, however, feel it has not gone far enough and includes a high proportion of intermediate products which they deem not genuinely affordable. It was seen that clarification needs to be made as to the difference between the borough target and the fast track target, and that additional guidance should be provided on the expected tenure mixes of build to rent schemes. As a result of viability work, the policy has been amended, it refers to the 50% Brent strategic affordable target, clarifies a 70% London Affordable Rent/ 30% intermediate split for the affordable housing, 100% London Living Rent for affordable housing requirement of Build to Rent and also seeks an affordable housing commuted sum for sites of between 5-9 dwellings.

Policy BH6 housing mix saw some resident support, but some felt 25% 3+ beds was too low considering the perceived need for families. Developers in general saw this policy as too prescriptive and inflexible, preferring for the council to fall back to London Plan policy. With regards to policy BH7 (accommodation with shared facilities or additional support), Unite Students commented in objection to criterion D and E. The policy has been amended to remove the maximum student accommodation threshold figure of 20% in Growth Areas and the need for a tie to specific educational establishments. For specialist older persons housing, the GLA wanted site specific allocations using an evidence based approach, whilst developers are concerned with viability implications. St. George stated that affordable housing provision should be reduced on sites which need to provide older persons housing. The GLA welcomes the Council's use of the new Draft London Plan definition of Gypsy's and Travellers, however, the threshold approach taken is unlikely to bring forward sufficient sites and should therefore be supplemented with allocated sites. It is generally seen by developers that the residential amenity space requirements as outlined in policy BH13 are too high. In light of increased housing delivery targets, the GLA and developers suggested that there should be increased flexibility to accept lower levels of provision.

Social Infrastructure

There were 31 comments on this chapter. It resulted in 4 changes to the document. There was strong support from residents for the retention of existing social infrastructure. The Department for Education and Brent CCG welcome the inclusion of a specific chapter for social infrastructure and the recognition of the need for additional facilities to support a growing population. Clarity was sought as to how a facility can be assessed as no longer viable. As a result the policy has been amended to no longer required. Residents unanimously agree that more facilities are required and are concerned that how delivery will take place once a need has been identified. Therefore, an Infrastructure Delivery Plan will need to be produced (currently underway) to identify required facilities with indications of how they will be delivered.

Economy and Town Centres

There were 88 comments on this chapter. This resulted in 8 changes to the document. Policy BE1 had general support, including from both the GLA and neighbouring Boroughs. Respondents identified the need to define the proposed educational/cultural quarters, so that informed comment could be made. This will be done on the policies map for publication stage. The GLA objected to policy BE2 (SIL and LSIS) as believe the policy will lead to the wholesale release of industrial lands. They required the Council to produce additional evidence of how it will 'provide capacity'. Developers disagreed and saw the policy as too inflexible, and would like to see the inclusion of additional sites for co-location. Policy BE2 has now been amended to only include 'some' co-location on identified sites. Policy BE3 (local employment sites and work live) is generally supported, however, the GLA sought the retention of all B2 and B8 uses. With regards to policy BE4 (supporting strong centres diversity of uses) there is support for meanwhile uses and a general agreement from residents that there is the potential for peripheral, less viable secondary frontages to convert to residential. Both the GLA and Quintain feel as though the ban on new A4 and A5 uses may work against policy BHC4 which looks to support Brent's night-time economy. However, due to de-designation of previously primary frontage to secondary, town centres remain sufficiently flexible so as to facilitate the development of both the night-time and day-time economy. However, the supporting text of policy BE4 has been amended to place greater emphasis on the provision of entertainment and leisure uses. The policy has also placed greater emphasis on meanwhile uses. It now requires all major phased developments within town centre areas to submit an appropriate Meanwhile Feasibility Study and if feasible, a Meanwhile Strategy. Residents support the restriction of betting shops and take-aways in policy BE5, however, feel as though they could be more stringent. KFC object, seeing the decision to restrict new provision of A5 premises in combination with new permitted development rights to convert A5 uses as a process of potential elimination from the high street. Several small wording amendments have been made to provide more clarity for policy interpretation.

Heritage and Culture

There were 56 comments on this chapter. This resulted in 5 changes to the document. There was very strong support from residents and stakeholders for the protection and enhancement of Brent's heritage assets and for the allocation of newly proposed conservation areas. There was however also concern over the loss/reduction of existing conservation areas. Proposed protected views as outlined in policy BHC2 were generally supported. Nevertheless, many felt that views already had been severely compromised and parameters should be better illustrated through mapping. The OPDC have noted that view 17 is from within their authoritative boundary and will only be applicable to planning permissions within Brent where the OPDC is not the LPA. The council in return has requested the OPDC to consider the joint protection of this view. Quintain are generally concerned regarding the limitations view corridors will impose to development heights and associated housing densities. There is general support for policies surrounding creative and cultural industries (BHC3), the night-time economy (BHC4), and public houses (BHC5). There were no significant changes to this chapter, with all changes being minor wording amendments.

Green Infrastructure

There were 46 comments on this chapter. These resulted in 6 changes to the document. Support from Natural England, Environment Agency, GLA and residents for policy BGI1 (green and blue infrastructure). In particular, the requirement for new major developments to provide additional publicly accessible open space, or where this is not feasible contribute to enhancing off-site open space. The benefits of open space to quality of life, health, air quality and to biodiversity were all highlighted as reasons to protect open space. Both the GLA and Natural England support the reference to producing a Green Infrastructure Strategy. They suggested that a net gain in bio-diversity rather than no net loss should be required. The Plan has since been amended to reflect this taking account of changes to the national planning policy framework. The GLA suggested that Brent produces a locally specific Urban Greening Factor. This however is not a requirement with the London Plan standard being sufficient. Policy BGI2 Trees and Woodland was also supported. Residents would however like to see the policy go further. This includes establishing how tree coverage within the borough will be increased and the methods to establish the monetary value of trees. The policy on public open space provision in new developments has been amended to identify the size standard of space required and where such provision should be on site, or could use existing open spaces elsewhere. Policy BGI2 has been amended to provide more clarity about how loss of trees can be mitigated either on or off-site. Otherwise there were no significant changes to this chapter, changes were minor amendments.

Sustainable Infrastructure

There were 19 comments on this chapter. This resulted in 4 changes to the document. For policy BSUI1 (creating a resilient and efficient Brent), the Department for Education suggested BREEAM Excellent requirement for schools is an inefficient use of public funds. Quintain noted that the delivery of new CHPs may not be feasible and the policy should better reflect the flexibility of the London Plan. Policy BSUI1 has been amended to reflect support for district heating, rather than combined heat and power within the new Growth Areas, as well as requiring such provision in other Growth Areas. General support has been shown for policy BSUI2 on air quality, both by the GLA and residents. One resident suggested greater cohesion between the linked objectives of this and the green infrastructure policies. This has now been included. For the management of flood risk, the Environment Agency (EA) support policy BSUI3 but seek stronger wording so as to prevent development on inappropriate land due to risk of flooding.

The Canals and Rivers' Trust (CRT) have suggested that the canal can accept clean surface water drainage. Policy BSUI4 on surface water has seen strong support from both LB Harrow and the EA, who are pleased to see the promotion of SuDS. The CRT have also stated the potential for canal water to be used as a sustainable method of heating/cooling developments. This has been reflected in changes to the document as a consideration within canal side developments. There were no significant changes to this chapter, with all changes being minor wording amendments.

Transport

There were 77 comments. This resulted in 10 changes to the document. There has been strong support for the promotion of active travel and Healthy Streets Standards within policy BT1. In particular, there was support for the investment in Cycleways. Both the Canals and Rivers' Trust (CRT) and the LB Barnet support the policy, regarding improvements along the canal, and public realm along the A5 corridor respectively. The West London Orbital is also strongly supported. There was a recognition that orbital links need to be improved. There was also support for the delivery of step free access at prioritised stations. Responses to policy BT2 (parking and car free development) were more mixed. Developers were wholly supportive of car free development. Residents views on the other hand were more varied. Those living in car free developments were more likely to be supportive. It was commented that behaviours in car ownership will change. Concerns from those opposed included that car-free developments will impact on families, older and disabled people and that people will still park on-street. The GLA stated that proposed parking standards for offices within opportunity areas are not consistent with the London Plan. The Plan has now been amended to be consistent with London Plan standards.

The CRT welcome the support for increased use of the canal for freight as outlined in policy BT3. The overall reduction in car parking provision was of great concern among some residents. There was a fear that reduced provision at supermarkets will result in people having to drive further for their shopping. Residents have also requested for the number of bus services to be increased. These should also improve orbital links, particularly to stations and town centres. There were no significant changes to this chapter, with all changes being minor wording amendments.

Integrated Impact Assessment (IIA)

There were 11 comments on this document, resulting in 2 changes. The document was widely held by residents to be too large and complicated, with suggestions to publish in stages to provide more time for comment. It was also suggested that a Health Impact Assessment be produced separately.

The Environment Agency wanted to see reference to the DEFRA Biodiversity Calculator, and would like for us to carry out River Morphology Surveys for the River Brent catchment, and a mapping exercise every 3-5 years to help track the provision of new habitats. All of this has now been included within the IIA. They also suggested for us to include the need to achieve the equivalent to 'Good' ecological standards, as outlined in EU regulations, post Brexit. This was deemed unnecessary as the government are likely to commit to EU regulations in the short term after leaving. Historic England look forward to the development of a Characterisation Study which will further assist sustainable development. They have also noted that several site allocations have not identified the presence of heritage assets which will likely be affected should development take place. Natural England have suggested the wording under EN5 be changed to a 'net increase in biodiversity'. This wording has been included in the document. With exception to these minor amendments, this document has gone unchanged.

Appendix A

High Level Summary of Responses

Number of respondents/ how responded

- Figures show there were 195 unique respondents, making 1303 comments which resulted in 316 proposed changes (figure 1). A petition was also received from 537 people.
- When broken down, 173 respondents submitted reps via the online survey portal, 86 by email, and one was delivered by hand.
- 54% of reps were made by residents, with 46% made by organisations. 74% of the changes made to the document as a result of the consultation resulted from comments received from organisation (figure 1).
- 344 residents began to fill out the online form but did not submit (vast majority were left entirely blank). All comments (from about 44 people) have in any case been included to give a full picture of residents' views
- Workshops were attended by approximately 185 people who produced approximately 300 post-it comments (figure 2)
- Drop Ins about 120 people
- The top three commented on places were South West with 100 comments, South East with 93, and Central with 73 (figure 3 & 4).
- The top three commented on themes were Housing with 162 comments, Economy and Town Centres with 88, and Transport with 77 (figure 3).

More detailed comments received are set out in a separate [report](#), along with suggested responses, changes to the document and elements of additional work.

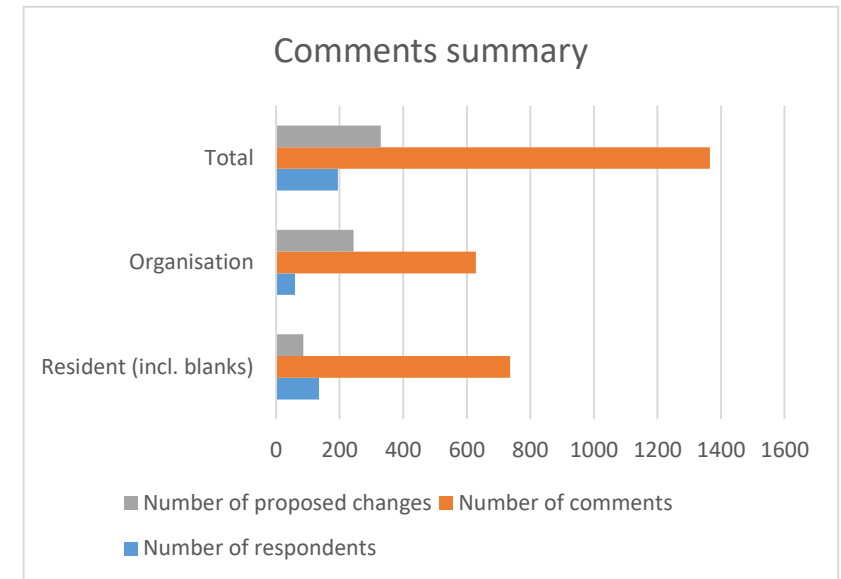


Figure 2: Summary of comments/ changes by resident/organisation

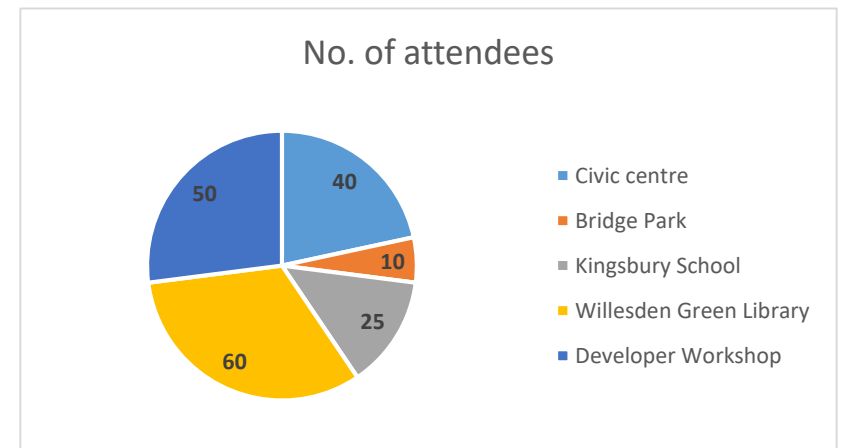


Figure 3: Break down of attendees by event.

Comments/changes by chapter

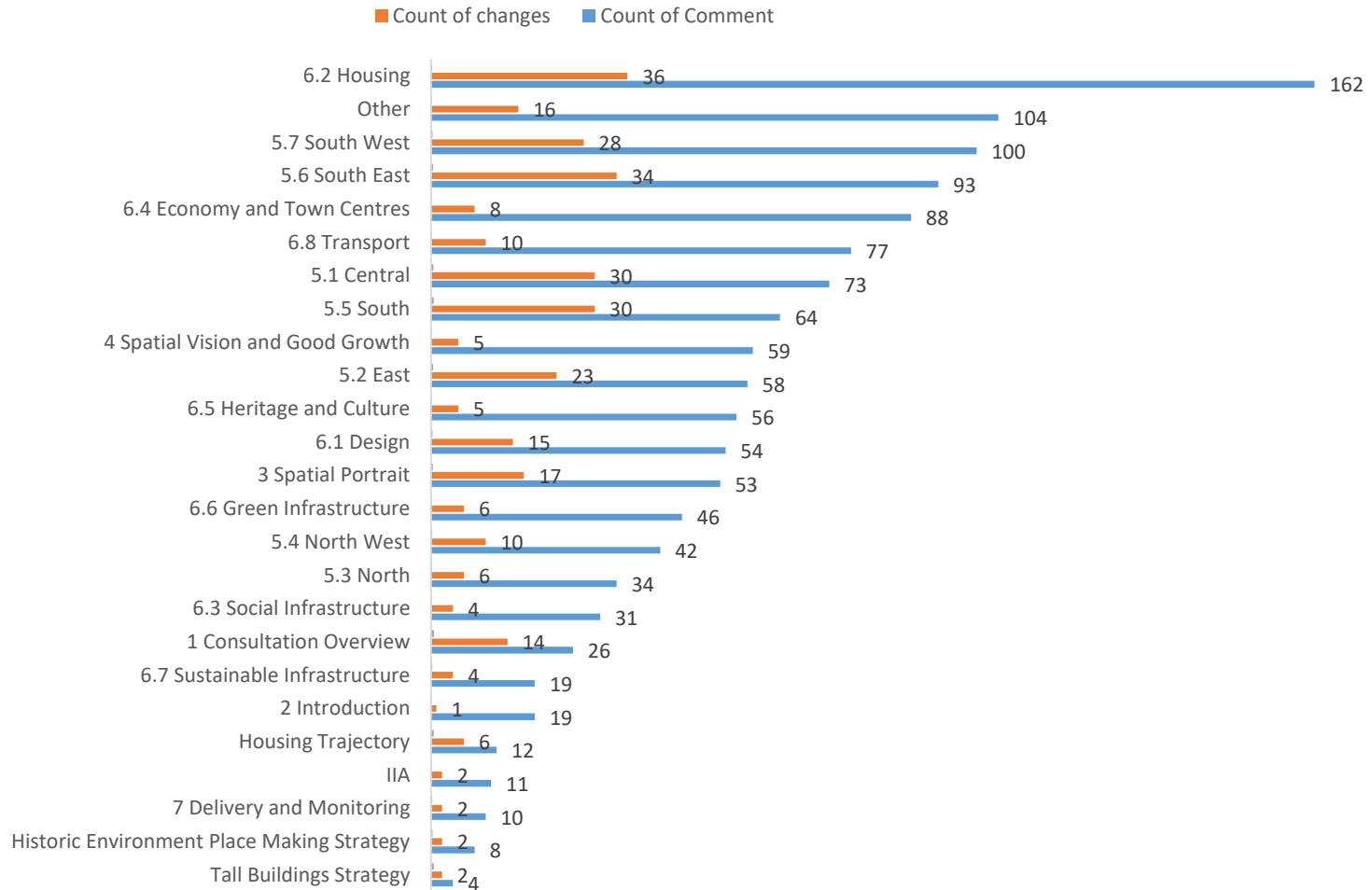


Figure 4: Summary of comments/ changes by chapter.

Comments about the consultation materials/ process

- Some residents complained that the Local Plan document is too long and technical to read or comment on. Some welcomed the Easy Read document and the simplified response forms were used by many respondents
- The workshops were very well received. Some people wanted them to be longer than the 2 hour sessions with more time on the interactive element.

Changes Made

- Content reviewed and simplified where possible.
- Infographics added, presentation improved to try to make it easier to understand.
- Better photos have been added that in most cases are more relevant to the subject

Comments on the Spatial Portrait

- Clarity of the map of the borough – things to add/ take out
- Topics – detailed comments on matters, e.g. older people's housing.

Changes Made in Response

- Changed 'jargon' title to Brent's Characteristics
- The map has had adjoining boroughs names, the street network and North Circular added
- Inclusion of additional points, e.g. older people's housing, on-line retailing

Comments on Spatial Vision and Good Growth

- There is generally strong support for the vision from both residents and developers
- Single issue respondents wanted items included in the vision, e.g. health and well-being and climate change.
- Topics – detailed comments on matters.
- Policy DMP1 didn't go far enough - more about minimum requirements rather than enhancement

Changes Made in Response

- The title has been changed from 'jargon' of 'spatial' to 'development' vision
- Reference to Health and Well-being in Vision
- DMP1 has been amended to seek enhancements where possible, including flooding, green infrastructure, ecological assets and heritage assets.

Central

Policy	Comments
BP1	<ul style="list-style-type: none"> • General opposition from residents to the proposed intensification corridor along Wembley Park Drive, especially where this backs on to single storey bungalows on Beechcroft Gardens • Support for new green infrastructure in Wembley Park, especially planters and a new park proposed as part of the Quintain masterplan • Residents are generally opposed to the number of tall buildings around the stadium area and would like to see lower-rise development in the future • Several residents and the Environment Agency support the naturalisation of the Wealdstone Brook where possible • Residents generally open to the idea of taller development around tube and train stations, a principle which is strongly supported by TfL commercial. TfL commercial would also like to see the town centre boundary extended to include Wembley Park Station carpark. • Quintain would like to see taller development wherever it is supported by high PTAL levels, not just on sites around stations • OPDC and Quintain would like clarification on the evidence base used to justify the quantum of town centre floorspace referred to
BCSA1 ASDA/ The Torch/ Kwikfit	<ul style="list-style-type: none"> • Residents concerned that building more homes on the ASDA site will worsen existing congestion problems, however one resident supports the allocation and development of high-rise buildings • Historic England think the allocation needs greater clarity to ensure protection of Barn Hill Conservation Area (CA), and that analysis should be undertaken to examine the effect of tall buildings on the CA
BCSA2 Stadium Retail Park and Fountain Studios	<ul style="list-style-type: none"> • Quintain would like to see the indicative capacity increased with a range up to 995 units as well as a reference to potential educational uses • Quintain object to a requirement to replace 'existing' retail and suggest that the level of retail in their application is appropriate. Quintain also object to a requirement to re-provide the TV studios as there is no sound justification for this as they are no longer fit for purpose • Quintain and United College Group would like to see flexibility on when sites come forward as they are not able to plan development alongside the CNWL site, however they note the Fulton Quarter masterplan would not compromise future development coming forward on the CNWL site
BCSA3 Brook Avenue	<ul style="list-style-type: none"> • Environment Agency welcomes the principle of an 8m setback for development from the water, and support investigating the naturalisation of Wealdstone Brook

BCSA4 Fifth Way/ Euro Car Parts	<ul style="list-style-type: none"> • Dominvs Group (the majority site owner) support the allocation but would like to see the proposed uses expanded to include the potential for hotel development, as well as the indicative capacity increased and more flexibility with building height • The Environment Agency support the 8m setback from the brook
BCSA5 Olympic Office Centre	<ul style="list-style-type: none"> • The allocation is supported by United College Group
BCSA6 Watkin Road	<ul style="list-style-type: none"> • Quintain object to the requirement for development to step down to the east end of Watkin Road as this could significantly limit the development potential of the site
BCSA7 Wembley Park Station	<ul style="list-style-type: none"> • TfL commercial support the allocation however would like to see the site split into two separate allocations (north and south of the railway line). TfL commercial feel the southern site capacity should be increased to c.300 units and included within the town centre boundary.
BCSA8 Wembley Retail Park	<ul style="list-style-type: none"> • Quintain state that they may be optimising the design of this site in 2019 leading to a higher capacity than previously assumed • Sport England object to the loss of football pitches on site and wish to see them retained or replaced as part of any future development
BCSA10 York House	<ul style="list-style-type: none"> • DfE welcome the allocation for a 3FE primary school on the car park site
BCSA11 CNWL Wembley	<ul style="list-style-type: none"> • United College Group support the allocation but would like to see the indicative capacity increased • Quintain think the capacity should be increased from 100 to 275 units reflecting the site's location as a 'gateway' to the new Wembley Park development
Other Comments	<ul style="list-style-type: none"> • Thames Water identified several sites where water and drainage capacity could be an issue and they need to be engaged at an early stage • The GLA noted that Brent is a 'provide capacity' borough and as such should be seeking to increase the industrial floorspace on existing employment sites
Changes made to the document	<ul style="list-style-type: none"> • Some more detail added to the assessment of the characteristics of the Place and challenges/ opportunities. • A Growth Area policy for Wembley has been added. • Policy BCSA2 – less prescriptive about the need to replace Fountain Studios and the existing amount of retail floorspace, whilst the indicative residential capacity has been increased. • Policy BCSA4 – green infrastructure requirements added • Policy BCSA5 – hotel added to acceptable uses, greater clarity provided on land adjacent to brook added. • Policy BCSA6 – residential indicative capacity removed as site is likely to be new College of North West London. • Policy BCSA7 – more planning considerations have been added to take account of the nature conservation value • Policy BCSA8 – more planning considerations added related to replacement employment floorspace and water issues

	<ul style="list-style-type: none"> • Policy BCSA9 – requirement for an equivalent number of dwellings to be provided for any uses proposed in place of conventional residential development – additional reference to quality pedestrian links between First and Second Way • Policy BCSA10 – York House office block removed from the allocation. Clarity on school needing to be provided elsewhere in Wembley Park if not on this site • Policy BCSA11 – Indicative housing capacity increased. • Site Allocations BCSA18 added – social infrastructure for Wembley Park development and BCSA19 residential development at Wembley Park station. • All allocations where appropriate have further advice on water supply and disposal requirements.
--	---

East

Policy	Comments
BP2 East	<ul style="list-style-type: none"> • Concern over proposed heights in tall building zone and intensification corridors.
BEGA1 – Neasden Stations	<ul style="list-style-type: none"> • General – support for what is proposed. Some concerns over heights and requiring masterplan in advance of planning permissions, e.g. CNWL site – Quintain. • United College Group concerned delays over development due to need for masterplanning work. • Sports England state that any sports facilities within the confines of the CNWL site will need to be re-provided. Site does have a MUGA which will now need to be replaced. • Aggregate Industries concerned over the potential loss of railway depot. • Desire by stakeholders including Quintain to split site up to increase deliverability. • Quintain object to heights which are seen as too conservative.
BEGA2 – Staples Corner	<ul style="list-style-type: none"> • General support for Staples Corner Growth Area • GLA want any industrial land release at Staples Corner to be part of a masterplan identifying how industrial floorspace capacity will be increased. They also state that co-location on SIL will not be acceptable • Barnet bringing forward Brent Cross development which has potential to improve development opportunity within Staples Corner, with masterplan work looking at how to successfully increase connectivity and reduce severance of north circular. • Natural England – support for the protection of Brent Reservoir SSSI - concerns on bird flights from Welsh Harp SSSI • Concern over congestion created with increase in residents without new road improvements. • Canals and Rivers Trust look forward to identifying appropriate water side uses at the Welsh Harp and improving its environment generally.

	<ul style="list-style-type: none"> • Masterplan work seen as a barrier to speed of delivery by multiple stakeholders.
BESA1 – Coombe Road	<ul style="list-style-type: none"> • Support – but concerns from Environment Agency re: flood risk assessment requirements
BESA2 – Cricklewood Bus Depot	<ul style="list-style-type: none"> • GLA concerns re: Industrial land loss and loss of bus depot.
Changes made to the document	<ul style="list-style-type: none"> • Policy BEGA1 – Reference to need to replace existing College sports facilities and clarity on open space requirements • Policy BEGA2 – Greater reference to comprehensive development being required, minimum amount of industrial floorspace provision, plus highlighting Natural England’s position re: height of building considerations for bird flight paths and Highways England’s position re: impacts on M1 and open space requirements. • Policy BESA1 and BESA2 – greater clarification on minimum industrial floorspace provision requirements • BESA4 removed and site identified as an existing planning permission. • All allocations where appropriate have further advice on water supply and disposal requirements.

North

Policy	Comments
BP3	<ul style="list-style-type: none"> • LB Harrow supports the vision for Burnt Oak and Kingsbury and would welcome further discussions • Department for Education welcome reference to exploring opportunities for additional secondary school provision, but seeking a site allocation with detailed requirements • TfL Commercial Development support policy to encourage residential development in town centres and on upper floors but feel five and six storey limit in town centres and intensification corridors is overly restrictive. Suggest that further reference should be made to supporting development within areas of strong public transport accessibility • Support for suburban character of most of this area being protected, along with Fryent Country Park, and the Trobridge-designed homes • Detailed suggestions to improve place included weekly food market at Kingsbury High Road, limit betting shops, improving the leisure facilities, parking and dining options in Roe Green open space and at Fryent Country park,

	<p>promoting arts and community spaces, providing affordable housing for single person households, highlight Kingsbury's proximity to Wembley, improved bus route Colindale Station and shopping area, secure a creative hub/community space to integrate community</p> <ul style="list-style-type: none"> • Objection to the A4006 Kenton Road from Preston Hill westwards being marked as an Intensification Corridor. Another resident suggested need to reduce traffic dominance along this route by implementing public realm improvements and new infrastructure
BNSA1 Capitol Way Valley	<ul style="list-style-type: none"> • Aberdeen Standard Investments supports allocation for mixed-use redevelopment, but the site could support a higher quantum of housing development. Due to the multiple ownerships across the allocation, piecemeal delivery of schemes should not be precluded, providing they do not prejudice the delivery of a wider masterplan in the future • Universities Superannuation Scheme support the allocation, but seeks flexibility to allow other complementary uses to come forward at existing employment sites should market demands for employment change in the future. • GLA commented an increase in employment floorspace should be sought as Brent is a provide capacity borough. • Thames Water has indicated upgrades to the wastewater network are likely to be required • LB Barnet commented the site is adjacent Colindale Regeneration Area and they'd like to ensure a co-ordinate approach appropriate to local context. In particular to avoid tall buildings along A5 road resulting in tunnelling • One resident opposed to an increase in residential development due to risk of increased car parking on Stag Lane, Capitol Way and Carlisle Road. Concern logistics companies are picking up and dropping off in this area without proper consents
BNSA2 Colindale Retail Park, Multi-storey car park and Southon House	<ul style="list-style-type: none"> • Thames Water has indicated upgrades to the wastewater network are likely to be required • LB Barnet commented site is adjacent Colindale Regeneration Area and they'd like to ensure a co-ordinate approach appropriate to local context. In particular to avoid tall buildings along A5 road resulting in tunnelling
BNSA3 Queensbury LSIS and Morrisons	<ul style="list-style-type: none"> • GLA an increase in employment floorspace should be sought as Brent is a provide capacity borough. • UK&EI support the principle of this allocation, the proposed co-location of uses and a masterplanning process. Commented site capacity, density, height and massing should be determined through a masterplanning process and the allocation should not specify a number • SHD Stanmore Ltd support but are seeking allocation allows development to come forward in phases rather than through a wider masterplan for the whole site allocation • Whilst the supermarket should remain, there is no need for further retail space. Affordable workspace should be sought • Overall residents supported need to improve quality of environment and feelings of safety, but had concerns regarding pressure on social infrastructure and transport network from new development

	<ul style="list-style-type: none"> Thames Water has indicated upgrades to the wastewater network are likely to be required.
BNSA4 Mecca Bingo	<ul style="list-style-type: none"> Theatres Trust support the design principles and the allocation for community use Sport England recommend the use of the site for new sports facilities is considered
Changes made to the document	<ul style="list-style-type: none"> A Burnt Oak/ Colindale Growth Area policy has been added, similar to that which was in the Core Strategy. A site allocation for Queensbury Station Car Park has been made related to a representation from TfL commercial. All allocations where appropriate have further advice on water supply and disposal requirements.

North West

Policy	Comments
BP4	<ul style="list-style-type: none"> Residents support proposals to maintain the suburban character of the area. LB Harrow also supports the overall vision of retaining and enhancing the characteristics of the area's Metroland past TfL Commercial note that, similar to other parts of the borough, reference should be made to the potential of optimising building heights and densities in area with high PTAL to unlock sites outside of the Northwick Park Growth Area
BNWGA1 Northwick Park Growth Area	<ul style="list-style-type: none"> Residents overwhelmingly feel that Northwick Park open space should be protected and are opposed to any high-rise development taking place Sport England request that a ball strike assessment is carried out to clarify whether any development adjacent to the playing field would detrimentally affect sport being played LB Harrow do not object to the allocation but would welcome further discussions with LB Brent A resident stated that height must be limited within the Growth Area to protect sight lines associated with Harrow on the Hill and surrounding Metroland heritage areas Some criticism that the Growth Area has been designated without consulting local residents
BNWSA1	<ul style="list-style-type: none"> LB Harrow agree that a replacement or similar use to the Sainsbury's be retained on site as part of any intensification There is concern that further development would increase congestion and could affect emergency service vehicles travelling to/ from the hospital
Other Comments	<ul style="list-style-type: none"> Thames Water identified sites where water and drainage capacity could be an issue and they need to be engaged at an early stage Apartments for London made a request for a site allocation at Preston Road for approximately 250 units of 100% genuinely affordable housing.

Changes made to the document	<ul style="list-style-type: none"> • Agreement with the Conservation Areas proposed but not the reductions
	<ul style="list-style-type: none"> • Policy BNWGA1 reference to a Ball Strike assessment being required, clarity on height consultation zones related to RAF Northolt.
	<ul style="list-style-type: none"> • All allocations where appropriate have further advice on water supply and disposal requirements.

South

Policy	Comments
BP5	<ul style="list-style-type: none"> • Focus on Church End welcomed • Support for boosting Harlesden's night time economy, promoting creative industries and improving links to Old Oak via Willesden Junction. It was commented Willesden Junction should be a growth area but this is part of the Old Oak Opportunity Area • IKEA commented the Plan should not designate their site as SIL • Neasden Temple identified an opportunity to make better use of their land around the temple, which they suggest would be enabled with a WLO Station at Taylor's Lane • Suggested environments around Harlesden Station should be an intensification corridor • Support for improving environmental quality along North Circular and the need for additional crossing points highlighted to reduce severance • Suggested a bus lane is needed on Brentfield Road
BSSA 1 Asiatic Carpets	<ul style="list-style-type: none"> • Kelaty Properties support the allocation, but consider a higher level of residential development could be achieved on site and that given the landownership the west of the site (Asiatic Carpets) could come forward separately to Cygnus Business Park to the east. Questioned if London Plan requirements regarding increasing industrial floorspace should apply to Asiatic Carpets as it is not LSIS
BSSA 2 Homebase and Cobbald Industrial Site	<ul style="list-style-type: none"> • Historic England highlighted the North West corner of the site is in an Area of Archaeological Interest and this should be identified as a policy consideration
BSSA 4 Dudden Hill Community Centre	<ul style="list-style-type: none"> • Roccopia Investment Ltd are seeking an increase in the site capacity to 50 residential units. Commented the play equipment on the site and the games court is redundant. Considered rather than provide these uses on site a financial contribution should be required to provide off-site in local parks. Should allow for retail and leisure uses at ground floor
BSSA 8 Wembley Point	<ul style="list-style-type: none"> • Environment Agency commented the site is partly within functional floodplain and should be treated as such.

	<ul style="list-style-type: none"> Wembley Towers Ltd commented the indicative capacity should be increased to 500-700 residential units, the site could support a number of taller buildings and only Argenta House site should be required to provide employment floorspace
BSSA 9 Bridge Park & Unisys	<ul style="list-style-type: none"> Stone Bridge Real Estate support the allocation but seek reference to the need to minimise car parking and to allow for commercial and community uses Sport England commented the allocation should refer to the Indoor Sports and Leisure Needs Assessment and also state the leisure centre should not be in close proximity to residential
BSSA 12 Learie Constantine Centre	<ul style="list-style-type: none"> Sport England sought assurances there will be no loss of sporting facilities
BSSA17 Harlesden Telephone Exchange	<ul style="list-style-type: none"> Historic England commented should be clear the assessment of any effects on the significance of Harlesden Conservation Area and Grade II* Church of All Souls should be referred to
BSSA 18 Craven Park Roundabout	<ul style="list-style-type: none"> Commented a difficult housing site due to a crossing and air quality concerns.
BSSA19 Chancel House	<ul style="list-style-type: none"> Department for Education strongly support the allocation of Chancel House for a secondary school. Questioned if there would be sufficient space for sport and recreation
General	<ul style="list-style-type: none"> Thames Water identified sites where water and drainage capacity could be an issue and they need to be engaged at an early stage
Changes made to the document	<ul style="list-style-type: none"> BSSA1 has been amended to provide clarity on industrial floorspace requirements and allow a phased approach to the development of the site, if it does not undermine efficient use of the site/ compromise policy outcomes. BSSA4 allows for contribution for upgrade/ provision of play facilities off-site. BSSA7 Long term vacant Crown Public House site now included in allocation Some small allocations have been moved to the further allocations table to reduce the document's length All allocations where appropriate have further advice on water supply and disposal requirements.

South East

Policy	Comments
BP6	<ul style="list-style-type: none"> Concern promotion of Kilburn's Night Time Economy could negatively impact on residents. Need to ensure this is focussed on and accessed from the High Road. Theatres Trust and some residents supported restaurant quarter around the Kiln Support for affordable workspace including co-working space

	<ul style="list-style-type: none"> • Some objections to identification of Willesden Land and Dudden Hill as intensification corridors and potential reduction of town centre, whilst others comments on the poor appearance of the west of the high road and need for redevelopment • Kensal Rise Resident's Association sought acknowledgment of Kensal Rise's restaurant and pub offer. • Queen's Park Residents Association (QPARA) supportive and suggest additional information could be included on the history of Queen's Park. Seek clarity on what constitutes Queen's Park Creative Quarter and greater protection for businesses on Lonsdale Road by incorporating this area into a Conservation Area. Commented must be ensured tall buildings in South Kilburn do not adversely impact on conservation area • Kilburn Neighbourhood Forum supportive suggest including reference to Kilburn's performance and entertainment venues. Supportive of measures to improve air quality along the A5 • Chippenham Gardens Local Shopping Parade should be referred to in local plan
BESAS3 Carlton House & BESAS 6 Crone and Zangwill	<ul style="list-style-type: none"> • Concern tall buildings in South Kilburn could result in overshadowing.
BESAS9 Kilburn Park Junior School	<ul style="list-style-type: none"> • Concern from GLA and a resident land swap with Old Granville Open Space and Wordsworth, Masfield and part of South Kilburn Open Space could result in a net loss in open space • Sport England seeking the MUGA on site is retained and improved
BESAS17 Cricklewood Broadway Retail Park	<ul style="list-style-type: none"> • Comment from a resident the Wickes should be retained on site. • LB Barnet commented should take account of Cricklewood Railway Terraces Conservation Area opposite
BESAS18 Cricklewood Broadway	<ul style="list-style-type: none"> • Support for redevelopment of uncharacteristic buildings • Industrial businesses on Hassop Road highlighted as problem. • Ravensdale Ltd state the site capacity should be increased to 91 residential units. Whilst European land and Property Ltd also endorse a higher capacity and commented the units on Hassop Road should be included in site allocation boundary as they will need to be redeveloped to ensure appropriate amenity is provided for future occupiers • LB Barnet commented should take account of Cricklewood Railway Terraces Conservation Area opposite
BESAS19 Gaumont Cinema	<ul style="list-style-type: none"> • Theatres Trust supportive of allocation and provided further information on its history as context • Kilburn Neighbourhood Forum support allocation
BESAS20 Kilburn Square	<ul style="list-style-type: none"> • Kilburn Neighbourhood Forum and residents support allocation, in particular the creation of a new public square and market

BSESA22 Willesden Green Sainsbury's and Garages	<ul style="list-style-type: none"> GLA commented given site includes industrial uses an increase in industrial floorspace should be sought
BSESA 23 Former Willesden Green Police Station	<ul style="list-style-type: none"> Support allocation, however consider the site capacity could be increased and that the building does not need to be designed to be subordinate to the Police Station
BSESA26 Car Wash Strode Road	<ul style="list-style-type: none"> Landowner supports allocation but considers a higher level of development could be achieved
BSESA34 Kilburn Park Underground Station	<ul style="list-style-type: none"> TfL Commercial development consider the site could support a higher level of development
General	<ul style="list-style-type: none"> Thames Water identified sites where water and drainage capacity could be an issue and they need to be engaged at an early stage
Changes made to document	<ul style="list-style-type: none"> A South Kilburn Growth Area policy has been added for additional clarity, similar to that within the Core Strategy Clarification that 'agent of change' principle will apply to Night Time economy uses in Kilburn Some small allocations have been moved to the other allocations table to reduce the document's length All allocations where appropriate have further advice on water supply and disposal requirements.

South West

Policy	Comments
BP7	<ul style="list-style-type: none"> The highest response rate from residents related to the South West place, with strong opposition to any tall buildings or development which would alter the existing 2-3 storey character Very strong opposition to any development at Vale Farm which did not relate to sports use, particularly any enabling residential development Organised response from Sudbury Town Residents' Association opposing any development along intensification corridors, at Vale Farm and the allocation of car showrooms Support for development plans from various bodies including TfL Commercial, LB Harrow, St George, and Canal & River Trust

BSWSA1 Alperton Industrial Sites	<ul style="list-style-type: none"> Allocated use is supported and a masterplan to co-locate residential with increased industrial capacity is currently being worked up by Peabody along with Barton Willmore Vardy Ltd (owners of part of the site) support the allocation Canal & River Trust support recognition of the canal as part of a green chain and the need for additional planting. There may be scope to create a boater facilities hub as part of a new development
BSWSA3 Atlip Road	<ul style="list-style-type: none"> Canal & River Trust support the allocation and welcome pedestrian/ cycle routes from Ealing Road to the canal. To be successful these routes will need either to find a way to link to the canal towpath or provide a destination Sport England request that the replacement for the Atlip Centre should also include a gym so there is no loss of sport facilities
BSWSA4 Sunleigh Road	<ul style="list-style-type: none"> Residents would like to see additional pedestrian bridges and access to the Grand Union Canal Canal & River Trust comment that allocation text is supported, however appropriate heights should also be established in the text
BSWSA7 Northfields	<ul style="list-style-type: none"> St George welcome the allocation but would like to see flexibility on housing capacity St George would like to see the design principles set out more clearly
BSWSA11 Keelers Service Centre	<ul style="list-style-type: none"> Objection from Sudbury residents to the site allocation, and a wish to see it retained as an employment site Objection from local residents to any development above 2-3 storeys being built which would overlook Barham Park
BSWSA13 Sudbury Town Station Car Park	<ul style="list-style-type: none"> Strong objection from residents to the loss of the car park and a concern this will lead to commuters parking on residential streets Pocket Living support the allocation but would like to see the capacity increased
Other Comments	<ul style="list-style-type: none"> Thames Water identified sites where water and drainage capacity could be an issue and they need to be engaged at an early stage. The GLA noted that Brent is a 'provide capacity' borough and as such should be seeking to increase the industrial floorspace on existing employment sites Request from London Hotel Group to allocate a site on Elm Rd behind Wembley High Rd for residential and hotel use
Changes made to the document	<ul style="list-style-type: none"> An Alperton Growth Area policy has been added, similar to that within the Core Strategy. Policy BSWSA1 has additional clarity provided on amount of industrial floorspace required For the Alperton site allocations, due the disparate landownership on most sites a requirement for a comprehensive approach to redevelopment has been included. Policy BSWSA7 – more detail on design principles have been added rather than referencing the existing planning permission. An additional site allocation has been identified for Elm Road as a result of representation received. All allocations where appropriate have further advice on water supply and disposal requirements.

Design

Policy	Comments
DB1 tall Buildings in Brent	<ul style="list-style-type: none"> • General opposition from residents to tall buildings (5-6 storeys) matched by responses from developers that this limit is too low • Some agreement to further development of tall building in already established tall building areas. • GLA - limiting building heights to 15-18m in intensification corridors and town centres is restrictive and exceptions should be provided • London Hotel Group/ united college group would like to see greater flexibility to proposed heights, especially in the Wembley Park area. • Desire to see tall building zones included within policies map for consultation. • Historic England have stated their requirement for a better definition of what high quality design is. • CRT/EA have stated the impacts tall buildings can have on waterways and how the policy should be better worded to protect against any adverse impacts. Should have greater than 8m setback dependent on height of building to reduce overshadowing etc.. • TfL Commercial – building heights should be determined on a site by site basis through a design led approach. • St. George wish to see greater flexibility for heights outside of proposed tall building zones i.e. southwest of Northfields site. • Quintain object to max heights. • Some respondents have refrained from commenting until map produced which better depicts proposed zones. Tall building strategy not a sound evidence base with policy requiring a views assessment, townscape and heritage assessment. Plan does not currently allow for a change in scale/character that is required to meet its housing objectives as acknowledged in the plan. • Amafhh Investments - When considering Staples Corner, greater regard should be had toward the heights of granted applications within the neighbouring Brent cross site, with heights breaching 100m.
BD2 Basement Development	<ul style="list-style-type: none"> • Some support, some consider didn't go far enough and that non-planning measures were inadequate in protecting amenity, e.g. Party Wall Act • EA – increased risk to be mitigated by the inclusion of a suitable pumped device. • Historic England would like further consideration of the sites archaeological heritage.
Changes made to the document	<ul style="list-style-type: none"> • An overarching policy has been added on design.

- Policy BD1 has been amended to allow for some flexibility on height in identified areas subject to it being of excellent quality/ not adversely impacting on character and the potential for additional height in certain circumstances in areas not yet identified. The Tall Buildings Strategy has also been amended to allow greater height in some locations. The policies map will identify tall buildings zones.

Housing

Policy	Comments
BH1 Increasing Housing Supply in Brent	<ul style="list-style-type: none"> • Many residents opposed to the new homes required number • Developers and the GLA noted that the proposed target was not in line with the draft London Plan. • HUDU/Brent CCG state keen to work with council to provide supporting infrastructure to help deliver new housing. There should be reference to planning permissions being dependent on securing the necessary infrastructure to support growth.
BH2 Priority Areas for Additional Housing Provision within Brent	<ul style="list-style-type: none"> • Support delivery of optimised densities on all appropriate brownfield sites. • Impractical to meet targets in Brent – should look outside. • GLA – identify sufficient sites to meet London plan targets. • Apartments for London – should include high PTAL areas/ transport hubs. • Support for growth areas. • Quintain – object to requirement to re-provide commercial floorspace.
BH3 Build to Rent	<ul style="list-style-type: none"> • Residents concerned over impact on community due to churn and transience levels. • Some support seen provided rents are affordable. • TfL Commercial – support, however, too inflexible due to threshold i.e. B2R on sites smaller than 500, and non B2R on sites larger
BH4 Small Sites and Small Housing Development in Brent	<ul style="list-style-type: none"> • GLA – policy will confuse London plan presumption in favour of development within 800m of a station/town centre boundary.
BH5 Affordable Housing	<ul style="list-style-type: none"> • St. George – too inflexible to be future proof. • Affordable products should be linked with average incomes, not prices. • Need to include appropriate affordable rent products in policy, including proposed splits.

	<ul style="list-style-type: none"> • More clarification sought as to borough target as seems to be confused with fast track target. • Residents do not feel goes far enough as includes high proportion of non-genuinely affordable products. • Quintain - Include affordable housing size mix due to impacts on viability. Also make clear that it is by habitable room and not units.
BH6 Housing Size Mix	<ul style="list-style-type: none"> • Some residents see 35% as too low. • Too inflexible – should be case by case. • AFL – no prescription. If applied should be to rented units. • TfL Commercial – should only apply to low cost rented homes. • GLA – SHMA identifies a need for 19% 3 beds. • Residents feel homes being developed are too small for families. • St. George deem onerous and should adopt London plan policy, or provide more flexibility. • Should be more prescriptive about 4 & 5 beds too. • Quintain – delivery would undermine viability. Should be more specific if to be included, providing greater clarity.
BH7 Accommodation with Shared Facilities or Additional Support	<ul style="list-style-type: none"> • Unite students - Criterion d) is too onerous as it is not possible for nominations agreements to be in place with specified educational institutions prior to the grant of planning permission. Criterion E) is not supported. Acknowledge concerns over the concentration of student accommodation. • GLA – the needs of students and those in HMO's differs and should be reflected in the policy.
BH8 Specialist Older Persons Housing	<ul style="list-style-type: none"> • St. George wish to reduce provision of affordable housing on sites which require specialist housing due to viability concerns. • GLA – amend policy to identify specific sites through an evidence based approach • Quintain - Part (a) is unclear. Difficult for individual developers to work together without the Council acting as a mediator. The 10% requirement should be in addition to the site's residential allocation due to viability considerations. The policy needs to refer to Policy BH7, as there will be areas not suitable for Older Person Housing.
BH9 Gypsy and Traveller Accommodation	<ul style="list-style-type: none"> • Appropriate sites should be identified. • GLA – welcomes use of new London Plan definition, however, current threshold approach unlikely to result in sufficient provision and should be supported by the allocation of sites.
BH10 Resisting Housing Loss	<ul style="list-style-type: none"> • GLA - Policy should include 3 bed+. Occupiers should look to extend properties instead of new developments providing additional family units which will result in a lower overall residential delivery. Resulting family units should then be occupied by families, not sharers. Measure need to be identified to monitor this policy.

BH11 Conversion of Family Sized Dwellings	<ul style="list-style-type: none"> GLA - Prevention of conversion of family dwellings under 130 sqm is excessive and should be reviewed in line with evidence of local need. 130 sqm goes beyond space standards for a 6-bed dwelling for occupation by up to 8 people, as outlined within the London Plan.
BH13 Residential Amenity Space	<ul style="list-style-type: none"> L&Q support however require flexibility as urban areas will unlikely achieve such quantum's. St. George – support but require flexibility. Quintain – policy should be amended in light of increased housing targets. Is onerous and should rather be based on unit sizes. AFL – wish for greater guidance on how unmet delivery can be provided as a communal offering. GLA - amenity requirements should be amended to include more flexibility to allow optimisation of housing delivery.
Changes made to the document.	<ul style="list-style-type: none"> Policy BH1 delivery target has been revised to take account of likely deliverable sites. Lack of identified capacity however, makes it still below the draft London Plan target which assumes a very high proportion of windfall delivery on smaller sites. As a result of viability work, Policy BH5 has been amended, it refers to the 50% Brent strategic affordable target, clarifies a 70% London Affordable Rent/ 30% intermediate split for the affordable housing, 100% London Living Rent for affordable housing requirement of Build to Rent and also seeks an affordable housing commuted sum for sites of between 5-9 dwellings. Policy BH7 has been amended to remove the maximum student accommodation threshold figure of 20% in Growth Areas and the need for a tie to specific educational establishments.

Social Infrastructure

Policy	Comments
BSI1 Social Infrastructure and Community Facilities	<ul style="list-style-type: none"> Residents strongly support policies to retain existing community facilities DfE and Brent CCG welcome the inclusion of a specific section on social infrastructure and recognition of the need for additional facilities to support a growing population Some clarity may be needed on how a facility is assessed as being no longer viable, with some concern this could be manipulated. Wording could be amended to “no longer required”
Other Comments	<ul style="list-style-type: none"> General feeling that more work is needed on how additional community facilities will actually be delivered once a need has been identified Sport England would like to see greater protection given to sport uses

Changes to the document	<ul style="list-style-type: none"> • Policy BSI1 has been amended to provide clarity on when a loss of social infrastructure could be acceptable from unviable to no longer required. •
-------------------------	---

Economy and Town Centres

Policy	Comments
BE1 Economic Growth and Opportunities for All	<ul style="list-style-type: none"> • GLA and LB Harrow supportive of policy • Quintain commented if the Wembley Educational Quarter is a defined area it should be identified on the policies map • St George support policy to secure enterprise hubs in Growth Areas and requirement for all major developments to prepare an Employment, Apprenticeship and Training Plan. Seek clarification affordable workspace requirement does not apply where employment floorspace is being re-provided
BE2 Strategic Industrial Locations and Locally Significant Industrial Sites	<ul style="list-style-type: none"> • GLA objected as they believe the policy will release SIL and LSIS. Further evidence needed on how Brent will provide an additional 43ha of employment land or a locally evidenced figure. • Whilst the GLA feel the policy is too flexible, a number of developers felt it was not flexible enough. Amafh Investments Ltd commented a net increase in employment floorspace should not apply to individual schemes. Whilst UK & European Investments commented Honey Pot Lane LSIS should not be required to provide an increase in employment floorspace only no net loss • Developers sought the following sites to be identified as suitable for co-location: Kingsbury LSIS, Alperton Central LSIS, Alperton South LSIS, and Northfields SIL • Travis Perkins, whilst supporting co-location at Staples Corner, commented builders' merchants must be protected and retained as part of any development • OPDC commented reference to West London Waste Plan should be included
BE3 Local Employment Sites and Work Live	<ul style="list-style-type: none"> • General support for securing affordable workspace • GLA commented the policy should seek to retain B2 and B8 uses • Travis Perkins are seeking a greater level of protection for existing occupiers • St George object to the requirement for a Managed Affordable Workspace Provider to be identified in the section 106 obligation, arguing the occupier could be identified at a later stage
BE4 Supporting Strong Centres Diversity of Uses	<ul style="list-style-type: none"> • General agreement from residents that there is potential for conversion to residential on the periphery of some high streets in the borough including Willesden High Road and Church End • Support for policy encouraging meanwhile uses on sites which will be vacant for extended periods

	<ul style="list-style-type: none"> • The GLA are concerned that policy BE4 could work against policy BHC4, and would like to see a more flexible approach to diversify the night-time offer in appropriate locations, including A4 uses • Quintain feel a blanket ban on new A4 and A5 uses within Primary Shopping Frontages is too restrictive and could contradict policy BHC4, potentially hindering Wembley's aspiration to become a Metropolitan centre
BE5 Protecting Retail in Town Centres	<ul style="list-style-type: none"> • Residents feel policies restricting betting shops and takeaways could be even more stringent. Strong support for policies which limit the number of these shops on high streets • Objection from KFC on policy to restrict takeaways, particularly on the decisions to include primary schools in the 400m buffer. This is consistent with London Plan policy however • Concern that takeaways and gambling shops lead to increase in antisocial behaviour
BE6 Neighbourhood Parades and Isolated Shop Units	<ul style="list-style-type: none"> • Strong support to retain isolated retail units from Kensal Rise Residents' Association • Concern that evidence of "marketing for two years" isn't clear enough and a framework for judging whether marketing has been appropriate is needed
BE7 Shop Front Design and Forecourt Trading	<ul style="list-style-type: none"> • Feeling that the policy is not strong enough for historic buildings on Kilburn High Road, where shop frontages and sign design should be more sympathetic to the area's history • Kensal Rise Residents' Association feel that forecourt trading is important to Chamberlayne Road however pavements should be widened to facilitate this
BE9 Visitor Accommodation and Attractions	<ul style="list-style-type: none"> • Amafhh Investments Ltd feel the policy should be widened to support hotel development in industrial locations suitable for development through co-location in addition to Wembley and Kilburn town centres • Stonebridge Real Estate Development Ltd (Unisys site owner) feel it should be reflected in the allocation text that it is suitable for visitor accommodation despite not being located within a town centre. This based on the existing allocation and previous positive pre-app discussions
General	<ul style="list-style-type: none"> • Need to secure skilled jobs as well as employment floorspace • West London Business welcomed commitment to 5G across the borough, but would like specific requirements around ducting and gigabit fibre connections
Changes made to the document	<ul style="list-style-type: none"> • Policy BE2 has now been amended to only include 'some' co-location on identified sites. • Policy BE4 supporting text has been amended to place greater emphasis on the provision of entertainment and leisure uses. The policy has also placed greater emphasis on meanwhile uses. •

Heritage and Culture

Policy	Comments
--------	----------

BHC1 Brent's Heritage Assets	<ul style="list-style-type: none"> • Very strong support of protection and enhancement of Brent's heritage assets • Strong support for the proposed new Conservation Areas - some complaints about proposed reductions or deletions
BHC2 National Stadium Wembley	<ul style="list-style-type: none"> • Stadium views – concern from Quintain about impact on development heights, whilst most of Brent population that responded considered that the views had already been severely compromised.
BHC3 Supporting Brent's Culture and Creative Industries	<ul style="list-style-type: none"> • OPDC and Harrow support policy and look forward to further collaboration on neighbouring/cross boundary issues. • Theatre Trust – support policy encompassing both culture and workspace.
BHC4 Brent's Night-time Economy	<ul style="list-style-type: none"> • GLA/ Quintain – feel policy could be impeded by policy BE4 in that it restricts the provision of A4/A5 uses in primary frontages. • Quintain support this policy. • Theatres Trust – policy will help deliver the food and drinks cluster around the Kiln Theatre for which they also support.
BHC5 Public Houses	<ul style="list-style-type: none"> • General concern for their overall decline, and requests for their support by residents. • Concern over the designation of the Torch as a site allocation. • GLA supports policy.
Changes made to the document.	<ul style="list-style-type: none"> • No significant changes were made to policies or supporting text.

Green Infrastructure and Natural Environment

Policy	Comments
BGI1 Green and Blue Infrastructure in Brent	<ul style="list-style-type: none"> • Support from Natural England, Environment Agency, GLA and residents for this policy. In particular the requirement for new major developments to provide additional publicly accessible open space, or where this is not feasible contribute to enhancing off-site open space. The benefits of open space to quality of life, health, air quality and to biodiversity were all highlighted as reasons to protect open space. Detailed suggestions were provided for how specific open spaces could be improved and better maintained • Developer St George commented financial contributions should only be sought when developments are unable to deliver open space in accordance with the Council's standards and are therefore required to make an unacceptable development acceptable

	<ul style="list-style-type: none"> • GLA suggested Brent should set its own locally specific Urban Greening Factor rather than refer to the default in London Plan policy • GLA and Natural England advised wording should state net biodiversity gains will be sought rather than no net loss, to reflect NPPF and attest version of the London Plan • Suggestion policy should include reference to Biophilic design • Sport England should have specific standards on sport and recreation to reflect. <i>(Note the Playing Pitch Strategy and Indoor Sports and Leisure Needs Strategy are reflected in the place policy chapters and Social Infrastructure chapter.)</i> • GLA and Natural England supported reference to producing a Green Infrastructure Strategy, this accords with the London Plan • GLA welcomed policy to secure food growing in major developments • LB Harrow supported policy and would welcome further discussions on cross-boundary opportunities to enhance blue and green infrastructure
BGI2 Trees and Woodland	<ul style="list-style-type: none"> • General support for policy to protect trees but could go further to set out how the council will proactively increase tree coverage • The monetary value of trees and their loss should be assessed using a method such as iTree
Other Comments	<ul style="list-style-type: none"> • Canal and River Trust would welcome the council's input in developing a long term sustainable strategy and partnership working towards achieving Green flag status for Brent Reservoir • Natural England stated need to consider impact of development on Brent Reservoirs SSSI
Changes made to the document	<ul style="list-style-type: none"> • Policy BGI1 has been amended to identify the size standard of space required and where such provision should be on site, or could use existing open spaces elsewhere. • Policy BGI2 has been amended to provide more clarity about how loss of trees can be mitigated either on or off-site. •

Sustainable Infrastructure

Policy	Comments
BSUI1 Creating a Resilient and Efficient Brent	<ul style="list-style-type: none"> • The Department for Education question whether new schools should be required to achieve BREEAM 'Excellent', and propose a more efficient use of public funds would be to aim for 'Very Good' instead • Quintain would like the policy to acknowledge that the delivery of a new CHP may not be feasible or viable and should recognise the shift in energy policy where the GLA are now promoting other forms of communal heating

BSUI2 Air Quality	<ul style="list-style-type: none"> • The GLA and Kensal Rise Residents' Association support Brent's approach in promoting air quality positive development • Suggestion from a resident that the supporting text could cross refer to Green Infrastructure policies, specifically a requirement to provide green roofs and open spaces
BSUI3 Managing Flood Risk	<ul style="list-style-type: none"> • The Canal & River Trust suggest that new developments could explore the potential for the canal to accept clean surface water drainage from adjacent developments • The Environment Agency have some suggestions for amendments to the wording of the policy to provide greater clarity, however the policy is supported in principle
BSUI4 On-site Water Management and Surface Water Attenuation	<ul style="list-style-type: none"> • LB Harrow and the Environment Agency strongly support this policy, with the EA particularly pleased to see the promotion of SuDS requirement for management and maintenance plans for new developments • Quintain feel the requirement of a draining strategy for minor development and change of use proposals should only occur where there is significant detrimental impact on the current draining regime. Where these strategies are required Quintain suggest they are assessed by LB Brent as Thames Water and the EA do not have the resources to process large numbers of drainage strategies and this will cause delays in determining planning applications
Other Comments	<ul style="list-style-type: none"> • Suggestion from residents that planning policy could somehow reward or incentivise environmentally friendly buildings • The Canal & River Trust would like the Local Plan to highlight the possibility of using canal water for heating and cooling buildings in developments adjacent to the water network
Changes to the document	<ul style="list-style-type: none"> • Policy BSUI1 has been amended to reflect support for district heating, rather than combined heat and power within the new Growth Areas, as well as requiring such provision in other Growth Areas.

Transport

Policy	Comments
BT1 Sustainable Travel Choice	<p>Active Travel</p> <ul style="list-style-type: none"> • Strong support for promoting Active Travel (walking and cycling) and designing to Healthy Streets standards, due to the health benefits and need to reduce pressure on the road network from an increasing population • Strong support for investing in cycle routes, with segregated routes preferred. Specific locations for improvement highlighted included Kensal Rise and Kilburn to Church End via Willesden Green and Harlesden to Cricklewood. • Canal and Rivers Trust support improvements to route along Grand Union Canal and are keen to work with Brent on this • LB Barnet support proposal to reduce traffic dominance and improve the public realm along the A5 and would like to work jointly on this

	<p>Sustainable Travel</p> <ul style="list-style-type: none"> • Overall strong support for the West London Orbital (WLO) and recognition of need to improve orbital links. Neasden Temple and a resident suggested the WLO should include a station at Taylor’s Lane, which could serve the temple and enable development. One objection to WLO on the grounds it will spoil the tranquillity of Gladstone Park • Support for increased step free access, with specific reference to Queen’s Park, Northwick Park and Willesden Green Station as priorities for step-free <p>Clean Technology</p> <ul style="list-style-type: none"> • Support for policy to increase electric vehicle charging points across the borough
BT2 Parking and Car Free Development	<ul style="list-style-type: none"> • Developers were wholly supportive of car free development, whilst comments from residents were more mixed. Those living in car free developments were more likely to be supportive and it was commented that behaviours in car ownership will change. Concerns from those opposed included car-free developments will impact on families, older and disabled people and that people will still park on-street <i>(Note car-free development is subject to high Public Transport Accessibility Levels and a Controlled Parking Zone being implemented. Standards allow for a higher level of car parking for family homes and car parking is still required for disabled people.)</i> • Broad support for car clubs • Support for policy to retain front gardens and frustration that in many cases gardens can be built over under permitted development rights • Developers commented cycle parking and disabled parking standards are too high and result in space which is underused <i>(Note cycle and disabled parking standards are set out in the London Plan, which our Local Plan must be in conformity with.)</i> • GLA commented Local Plan parking standards for offices within Opportunity Areas are not consistent with those in the London Plan
BT3 Freight and Service	<ul style="list-style-type: none"> • Canal and River Trust welcome policy to support waterborne freight
Other Comments	<ul style="list-style-type: none"> • More detail needed on how transport infrastructure will be funded • Concern developing on supermarket car parks will result in people driving further to other supermarkets • General call for increased frequency of services to meet population pressure on the Chiltern Railway and TfL bus and tube network. Detailed suggestions included the Metropolitan Line should stop at Willesden Green Station; buses should terminate at Hanger Lane rather than Alperton; linkages between the Piccadilly Line at Park Royal and Central Line at Hanger Lane should be improved; Alperton and Wembley Park stations should be Zone 3; and the cost of travel should be reduced

Changes to the document	<ul style="list-style-type: none"> • Need to safeguard railway land to ensure future schemes are not prejudiced from coming forward • The GLA's office car parking standards are considered appropriate and the Plan has been amended to remove Brent specific standards. •
-------------------------	--

Delivery and Monitoring

Part	Comments
Measures	<ul style="list-style-type: none"> • Lack of appropriate measurements for assessing some policy outcomes.
Changes to the document	<ul style="list-style-type: none"> • New transportation measures added.

Tall Building Strategy

Respondent	Comment
Quintain	<ul style="list-style-type: none"> • The methodology set out in the Draft Strategy for identifying appropriate tall building zones and heights is not considered to be sufficient in its scope and level of townscape and visual analysis to meet relevant guidance and best practice. In its present form, it is likely to unnecessarily restrict the scale and massing of developments in areas where greater height could be suitably accommodated, and so does not appear to support the stated objective of the document. • More of the following analysis required: visual, topographical, urban grain, conservation areas, listed buildings, open spaces, waterways. • Limited methodological scope seen to restrict potential for identification of other potential suitable areas. • Exclusion of Neasden and Staples Corner from 'areas of search' may have resulted in new areas being missed. • Methodology for calculation of proposed heights is not outlined, with the same variables coming to different results in different areas. • Church end has been omitted from tall building strategy and is therefore incompatible with the local plan aims of reducing blockages to development within said area. • Strategy does not consider implications of increase orbital links provided by the WLO on potential PTAL ratings. • Strategy should be flexible and be considered on a case by case basis
Amafhh Investments Ltd.	<ul style="list-style-type: none"> • Strategy makes no reference to permissions granted for tall buildings within Brent Cross regeneration area. • 100m tall building cluster in Brent cross should be given more weight considering proximity to staples corner. • PTALs used for staples corner do not reflect improvements to transport infrastructure currently being brought forward in the area (i.e. Brent Cross Thameslink station)
OPDC	<ul style="list-style-type: none"> • Remove analysis of building heights in OPDC area.

Changes made to the document	<ul style="list-style-type: none"> • Reference OPDC tall building statement for proposed areas within OPDC boundary.
	<ul style="list-style-type: none"> • The Strategy has been amended to include 3d images from VUcity to further support townscape and visual analysis. 3d Visuals will be added to search areas, which will give a better appreciation of townscape, views and the impact of heights and massing. • A topographic map is now included in the document. • All Growth Areas are now included as areas of search. • Descriptions of the relevant townscape and significant heritage assets will be included for each search area. • The upper heights for Staples Corner have been increased to 15 storeys.

Integrated Impact Assessment

Respondent	Comment
Environment Agency	<ul style="list-style-type: none"> • Include DEFRA Biodiversity Calculator under 'potential indicators' for EN5. • Undertake a mapping exercise every 3-5 years for newly created habitats to track effort. • Carry out river morphology surveys for River Brent catchment. • No mention of impact of flooding on communities and rivers. • Policies should seek to achieve the equivalent of 'Good' ecological status post Brexit.
Historic England	<ul style="list-style-type: none"> • Characterisation Study will be of high value in understanding the impact of, and helping to shape developments. Some site allocations (BCSA1, BNWSA1, BSSA17, BSESA21) not identified heritage considerations which exist.
Natural England	<ul style="list-style-type: none"> • Brent Reservoir SSI should be included as a criterion under EN5 which a target for a net increase in biodiversity.
Residents	<ul style="list-style-type: none"> • Health impact assessment should be separate. • Concern over MOL land swap proposal. • Too complicated. • Green space should be increased. • Infrastructure improvements need to happen prior to, or alongside residential development, not after.
Changes made to the document	<ul style="list-style-type: none"> • Included following recommendations from the Environment Agency: reference to DEFRA Biodiversity Calculator, mapping exercise for newly created habitat every 3-5 years, reference to river morphology surveys on River Brent catchment. • Amend the second EN% target to 'development schemes within the borough achieve a net gain for biodiversity.'