

BRENT LOCAL PLAN PREFERRED OPTIONS CONSULTATION RESPONSES

OCTOBER 2019

SUMMARY OF COMMENTS RECEIVED,
RESPONSES AND PROPOSED CHANGES TO
THE DRAFT LOCAL PLAN



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CONSULTATION OVERVIEW

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
1 Consultation Overview	1.1.1	Martin Francis	Determination of applications: Want reassurance the Plan will be followed.	In accordance with legislation the Plan will remain the principal starting point for assessing the appropriateness of any planning applications submitted.	No change
1 Consultation Overview	1.1.5	Martin Francis	Consultation: Period too short.	A balance was struck between the need to progress the Plan and ensure sufficient opportunity to review its content.	No change
1 Consultation Overview	Figure 1	John Cox	Maps: Should include railways.	Agreed, these would assist. Review of the maps indicates that putting these features on would make the plans very busy. As such inclusion of stations is considered sufficient.	Incorporate stations on maps where not currently shown and it does not distract from the presentation.
1 Consultation Overview		Vishal Sinha	Consultation: Needs better advertisement, more information available to residents and availability of officers. Need PDFs rather than word documents. Longer period for responses needed.	A large variety of promotion was undertaken. In terms of the consultation forms, respondents had the opportunity to use the website to make comments on matters if they could not use Word.	Review consultation and try to improve next stages.
1 Consultation Overview			Comprehensive: Plans for new homes and associated guide. Infrastructure: Detail - thin on the ground.	Noted. The Plan will seek to better address infrastructure provision where possible.	Provide clarity on infrastructure required wherever possible.

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1 Consultation Overview		Kelly Eaton	Growth and improvements: Many opportunities are present. Sustainability concerns: Reference is made to improving green spaces and additional tree planting, but missed opportunity to explicitly offer greening in new developments.	Noted. The greening of new developments is addressed through London Plan policy on urban greening factor which sets challenging targets for on-site green infrastructure provision.	No change
1 Consultation Overview		Veenay Chheda	Vision good, but concerns over delivery. There are many problems with serving the needs of the existing population. This should be the priority before additional population is added which will put more pressure on infrastructure and amenities.	Noted. These infrastructure concerns are understood and the plan will seek to address them where possible.	Provide clarity on infrastructure required wherever possible.
1 Consultation Overview		Valerie Gordon	Localism: London Plan housing targets are an over-burden. Council should work closely with the community to plan properly, including providing sufficient time to comment.	The Council is doing all it can to ensure that an achievable London Plan housing target is set for Brent. Whilst the sentiment is agreed in relation to 'bottom up' planning and significant engagement with local parties in planning the resources available to the team and timescales mean that such detailed engagement realistically cannot occur across the borough.	No change
1 Consultation Overview		Harini Boteju	Consultation time: Should have been longer - a lot read.	A balance was struck between the need to progress the Plan and	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				ensure sufficient opportunity to review its content.	
1 Consultation Overview		St George	Northfields: Implementation of significant planning permission has commenced.	Noted.	No change
1 Consultation Overview		Frederick Murray	Interesting reading - interested in Brent North	Noted.	No change
1 Consultation Overview		N Kusneraitis	Plan Content: Long and may be inaccessible to all affected.	Noted. Every attempt has been made to make the document as simple and as short as possible. It does however address the development of the whole borough for the next 25 years.	Review content and simplify where possible. Add use of infographics and try to improve presentation to make it easier to understand.
1 Consultation Overview		Philip Grant	Address Brent people's views. Unlike previous plans it needs to be adhered to instead of ignored with the resulting poor quality development.	In accordance with legislation the Plan will remain the principal starting point for assessing the appropriateness of any planning applications submitted.	No change
1 Consultation Overview		P Davies	Social Infrastructure: Unclear how it will be delivered.	The Plan will seek to better address infrastructure provision where possible.	Provide clarity on infrastructure required wherever possible.
1 Consultation Overview		OPDC	OPDC: Further clarification sought on the use of the OPDC Local Plan and planning application decision making.	Agreed some greater clarity could be provided on the role of OPDC.	Amend paragraph 1.1.2 to include after first sentence: "OPDC is responsible for writing the Local Plan for its area and

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					determining the majority of planning applications there too. As set out in a scheme of delegation, some planning applications it receives are determined by the Council."
1 Consultation Overview		Kevin Barry	Poor drafting, not clear on what will happen or philosophy of what is sought.	Noted. Every attempt has been made to make the document as simple and as short as possible. It does however address the development of the whole borough for the next 25 years.	Review content and simplify where possible. Add use of infographics and try to improve presentation to make it easier to understand.
1 Consultation Overview		Susan Bush	Clarity of support documentation welcomed	Noted.	No change
1 Consultation Overview			Consultation: Needs better advertisement. Meetings in the day time, excludes many. Document full of jargon.	All households were sent a flyer advertising the consultation and where to find more information on events. Meetings were principally out of normal office hours to encourage greater engagement. The use of jargon was reduced wherever possible.	Review content and simplify where possible. Add use of infographics and try to improve presentation to make it easier to understand.
1 Consultation Overview		Grace Brown	Plan Content: Too complex, non-professionals unlikely to read all.	A summary version of the Plan and an easy read version were made available, along with social media videos to highlight broad	Review content and simplify where possible. Add use of infographics and try to improve

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				content. It is accepted however that the Plan due to its required use may be inaccessible to some people.	presentation to make it easier to understand.
1 Consultation Overview		John Cox	Images: Better quality needed, e.g. Neasden Temple.	Agreed. Time pressures and capacity issues related to desktop publishing meant the quality of the document was compromised compared to what was planned.	Seek to improve quality and relevance of the document's images.
1 Consultation Overview		Elizabeth Gaynor Lloyd	Plan Content: Too complex, non-professionals unlikely to read all, insufficient detail on many elements which makes meaningful comment difficult.	A summary version of the Plan and an easy read version were made available, along with social media videos to highlight broad content. It is accepted however that the Plan due to its required use may be inaccessible to some people. The comment on lack of detail identifies the contradiction between the need for brevity, whilst seeking to provide as much certainty as possible on requirements and outcomes from development.	Review content and simplify where possible. Add use of infographics and try to improve presentation to make it easier to understand.
1 Consultation Overview			Upgrading and better use of sites: makes sense	Noted.	No change
1 Consultation Overview			Very comprehensive	Noted.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
1 Consultation Overview		Peter Marshall	West London Orbital: Excellent idea	Noted.	No change
1 Consultation Overview		Anthony Gardner	Plan Content: Non-professionals unlikely to read all.	A summary version of the Plan and an easy read version were made available, along with social media videos to highlight broad content. It is accepted however that the Plan due to its required use may be inaccessible to some people.	Review content and simplify where possible. Add use of infographics and try to improve presentation to make it easier to understand.
1 Consultation Overview		David Goodwin	Consultation: Deadline should be longer/ on-going engagement occurring. Review of consultation needs to occur to understand effectiveness and awareness amongst residents.	A balance was struck between the need to progress the Plan and ensure sufficient opportunity to review its content. Each stage has a review of the effectiveness of consultation. For this stage every household received a flyer advertising the consultation.	Review consultation and try to improve next stages.

INTRODUCTION

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
2 Introduction	2.1.1	Queen's Park Area Residents Association	The Local Plan should be integrated with Brent's Transport LIP 3.	Noted. The Transport policies have been prepared in close conjunction with colleagues in Transport, to be consistent with the Brent Long-term Transport Strategy, Walking and Cycling Strategy and LIP 3. Comments on the LIP3 consultation have been considered alongside those on the Local Plan.	No change
2 Introduction	2.1.5	Queen's Park Area Residents Association	Support the Council's rejection of the London Plan 2915 dwellings per year target. This level of growth will have massive consequences in terms of roads, schools, medical facilities, jobs and green space. Concern associated air pollution and road congestion.	Noted. The Council does not object to the number of dwellings as such, only the lack of identifiable capacity to deliver that target.	No change
2 Introduction	2.1.6	Martin Francis	More evidence needed to justify figures on population growth and consideration of impact of Brexit.	The population projections are from the GLA population model. This uses the actual population as the starting point then rolls forward one year at a time accounting for fertility, mortality and migration. The GLA has downgraded population growth forecasts as a slower rate of natural change (i.e. births less deaths) and lower	No change

				levels of net migration. Reductions in population growth due to Brexit could be tempered due to a rebalancing of migration between European versus non-EU migration and also population movements within the UK. In 2016/17 Brent population growth was driven by natural change and saw a net loss due to migration.	
2 Introduction	2.1.7	Quintain	Note LBB has challenged London Plan on the basis of meeting delivery target for small sites. If policies remain unchanged in London Plan note impact on the delivery of the Local Plan.	Noted	No change
2 Introduction	2.1.15	Martin Francis	Wembley Park and Wembley Central should not be two separate places. The two are inter-related and inter-dependant in terms of local transport and the Wembley High Road Boulevard corridor.	Noted. This would give rise to one very large place. The links between the two places are recognised and the need for continuity/ joined approach particularly to Wembley town centre understood.	No change, but pay attention to the Wembley town centre in particular in the two areas and seek consistency of messages/ policy.
2 Introduction		Vishal Sinha	Opposed to tall buildings. Brent does not have resources to support additional population growth.	The Local Plan is supported by a tall buildings study, which identifies a limited number of locations which area appropriate for tall buildings. It also identifies the level of infrastructure needed to support the new population through the infrastructure delivery plan and where this will be delivered.	No change

2 Introduction		Kevin Barry	Document too complex and contains too much technical information. An Executive Summary needed.	Note and acknowledge the need for plain English. The Local Plan needs to serve a wide audience including residents, businesses and developers. As a document which is used to decide planning applications it is sometimes necessary to use technical language. However, the point on need for an executive summary is acknowledged and a Quick Read and Easy Read version were made available.	No change
2 Introduction		Steve Langley	Support. Brent needs housing, jobs and transport.	Noted	No change
2 Introduction		Noelita Edgard	Support the principle of providing opportunities to live, work and learn in the borough and make Brent safer, cleaner and greener, and residents healthier and happier.	Noted	No change
2 Introduction			Quick Read is clear.	Noted	No change
2 Introduction		David Pearson	Support the Plan. Need to ensure developments are supported by infrastructure, including open space and recreational facilities. Existing open space and recreational facilities should be protected.	Noted. The Local Plan contains policies to provide for open space and recreational facilities and to protect open space and social infrastructure.	No change
2 Introduction			Clear about the rationale behind decisions.	Noted	No change

2 Introduction			Excited Brent is to be borough of Culture 2020.	Noted	No change
2 Introduction			Plan is clear.	Noted	No change
2 Introduction		P Davies	Does not mention how much will be spent in each area.	The Local Plan and its evidence base identifies the infrastructure needed to support development. There is a charge on development called Community Infrastructure Levy which, alongside other funding sources, funds infrastructure needed to support development. The Local Plan does not set out the amount to be spent in each area, as this will be dependent on the rate at which development comes forward.	No change
2 Introduction		HUDU/ Brent CCG	Highlight the NHS London Clinical Commissioning Group and the NHS London Healthy Urban Development Unit made representations to the Mayor on the draft London Plan and are participating in the hearings.	Noted	No change
2 Introduction		Harini Boteju	Section could be less wordy and broken up with sub-headings.	The Publication stage version of the Plan has been condensed where possible.	No change
2 Introduction			Plan fails people.	Without detail on how the people have been failed cannot provide meaningful response to this point.	No change

2 Introduction		Grace Brown	Local Plan will not be used and is a tick box exercise.	The Local Plan is a statutory document which the Council is legally required to produce. Once adopted it will hold weight and be used to decide planning applications.	No change
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SPATIAL PORTRAIT

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
3 Spatial Portrait	3.1.1	Queen's Park Area Residents Association	Wembley stadium: positive impacts overstated, impacts on neighbours are problematic. Positives: Quality and durability of homes built between 1890-1914 and adjacent parks - though so desirable are expensive. Affordable homes: Need for social rent understated.	Wembley stadium: do not agree. Positives: Noted. Affordable homes: Plan is clear priority affordable housing is social rent.	No change
3 Spatial Portrait	3.1.4	Queen's Park Area Residents Association	Population will change over time by unknown factors - need to look ahead beyond existing age profile.	This is taken into account through for example identifying housing need, education, etc.	No change
3 Spatial Portrait	3.1.4	Manjul Shah	Older population: Challenge that needs to be recognised.	This is mentioned, but as it is a priority policy later in the Plan could specifically be included as a challenge.	Amend Housing challenges to identify need for older people's accommodation.
3 Spatial Portrait	3.1.4	Mitesh Mashru	Older population: Challenge that needs to be recognised.	This is mentioned, but as it is a priority policy later in the Plan could specifically be included as a challenge.	Amend Housing challenges to identify need for older people's accommodation.
3 Spatial Portrait	3.1.6-10	Queen's Park Area Residents Association	Adverse congestion in Wembley and Willesden High Road town centre is overlooked. Competition of convenience and on-line retail is also not identified and rapid retail evolution needs more attention.	Congestion is referenced sufficiently throughout the document. Retail: On-line retailing is addressed in the Town Centres	Identify on-line retailing within the challenges faced by town centres.

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				chapter, but could be better referenced as a challenge.	
3 Spatial Portrait	3.1.7	John Cox	Add 'mainly radial' to rail and underground services description.	Accept this point.	Add 'mainly radial' to rail and underground services description.
3 Spatial Portrait	3.1.10	Martin Francis	Retail changes mean big changes for high streets and shopping centres. A focus on market share and consumerism in times of climate change is irresponsible.	Successful places rely on people coming together and commerce whether it is retailing, or other activities in which people are consumers is a large part of this. It is agreed that overall the western lifestyle in terms of resource demand is not currently consistent ensuring a sustainable future.	No change
3 Spatial Portrait	3.1.10		Growth areas and intensification corridors do not meet the identified challenges. Building is promoted but no clear details on supporting services. Consultation was not clear on corridor impacts. Reducing local centres which provide valuable services is not answer.	It is accepted that there should where it is available be clearer identification of the infrastructure required for growth areas and places. The plan does not seek to actively reduce local centres, but recognises that where viability becomes an issue due to changes in commerce sufficient flexibility is required to ensure buildings are used rather than staying vacant.	Amend Growth Areas and Places to identify wherever possible the known infrastructure requirements to support growth.

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3 Spatial Portrait	3.1.11	Quintain	Design panel: Would benefit from better briefing to ensure they add value/ are relevant. Tall buildings: identifying locations supported, but Tall Buildings Strategy is unsound.	Design panel: Agree that the better informed the panel is, the more relevant their input will be. This relies on them reading material supplied. Tall buildings: Noted. The tall buildings strategy has been reviewed on the basis of comments received.	Review tall buildings strategy and update the Plan in relation to areas identified for tall buildings and appropriate heights.
3 Spatial Portrait	3.1.11		New civic buildings have been poor and will not stand the test of time, better to revert to traditional architecture which will stand the test of time. Quality will improve living, tourism and tax base.	Do not agree on civic buildings which in most cases have been built using architects and high quality materials/ design. The Council accepts that good design is part is likely to deliver more sustainable outcomes, hence clarity in the Plan on it being necessary in new development.	No change
3 Spatial Portrait	3.1.12	Martin Francis	Suburban character: Needs more emphasis - desire to complement not undermine is not reflected in Alperton, Wembley Central & Wembley Park and high-rise elsewhere.	In the context of the challenges faced, it is considered that this is given sufficient emphasis and reflected in policies which in the main seek to reduce the potential for substantial change to most suburban areas.	No change
3 Spatial Portrait	3.1.13		Focuses on growth rather than existing residents - give reasons to stay.	The plan reflects the realities of needing to accommodate London's and Brent's population growth. Evidence suggests that	No change

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				<p>even with limited building, as was the case between 1991-2011 (+28%) the population will increase significantly. This will result in over-crowding of existing dwellings/ people living in unsatisfactory accommodation and pressure on social infrastructure. Brent has many very pleasant areas and the Plan seeks to ensure that the best bits are kept whilst meeting people's basic needs such as having a decent home or job is also satisfactorily addressed.</p>	
3 Spatial Portrait	3.1.13	Philip Grant	<p>Housing challenges right, but reflect similar aims of past which have not been properly enforced with developers who have got off lightly.</p>	<p>Government has recognised that changes to national affordable housing policy have resulted in developments often not sufficiently addressing such requirements. New policy at the national and London Plan level should improve these outcomes. Nevertheless, the majority of additional affordable homes will be reliant on cross-subsidy from private development, so its encouragement is required to support delivery.</p>	No change

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3 Spatial Portrait	3.1.15	Martin Francis	Mixed and balanced communities: Is it possible through private rent, especially affordable homes? Mixed communities should also relate to age - older people mixed with family homes, adult care and nurseries, etc.	Agreed. The Plan seeks to ensure private rented dwelling schemes also provide affordable housing. In relation to other housing requirements the Plan seeks to provide a stronger policy basis to ensure that mixed developments are much more likely to be achieved.	No change
3 Spatial Portrait	3.1.15	Quintain	Support challenge to meet and exceed Plan target. Do not support size mix on market and intermediate homes.	Noted. The desire to address identified needs for Brent is balanced against the need to encourage new housing development. The Council considers it has taken a proportionate response.	No change
3 Spatial Portrait	3.1.16		Need to concentrate on needs of existing community rather than planning for diversification.	Noted. The population of Brent will continue to change and as such the Plan needs to reflect this.	No change
3 Spatial Portrait	3.1.17	Brent Council (Schools Team)	Identified provision of additional secondary school places has changed to a new school 6FE school in September 2020 and expanding existing secondary schools for the remaining 7Fes	Noted. This can be reflected in the infrastructure requirements and specific sites where known.	Amend Plan in relation to the education infrastructure requirements and identify specific sites for new facilities where known.
3 Spatial Portrait	3.1.17	Quintain	Should reflect significant investment undertaken, recent change in pupil projections which means sufficient	This is reflected in paragraph 3.1.17. Schools will not be promoted by the Council where there is no specific need for them.	No change

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			capacity and need to monitor before new schools built.		
3 Spatial Portrait	3.1.18	Martin Francis	Expanded FE supported for 21st century skills related to green enterprise zone providing apprenticeships and benefitting from rate reduction	Focusing skills on likely employment growth sectors makes sense. It is not clear what benefits an enterprise zone would bring from a planning perspective. Empirical evidence indicates the 'success' of UK enterprise zones was a result of existing companies moving to take advantage of Treasury backed generous financial/ tax breaks.	No change
3 Spatial Portrait	3.1.19		Children's health would improve from the Council investing in more extra-curricular activities, reducing obesity and crime.	The Council is working with partners to consider how greater support can be given to young people in terms of activities outside school, particularly in relation to improving safety and reducing incidents of crime. Significant reductions to the council's budgets has undoubtedly impacted on the support that the council can do in relation to youth projects.	No change
3 Spatial Portrait	3.1.19	Martin Francis	More needs to be made of better use of parks and open spaces - more courts, clubs and youth centres would benefit physical and mental health.	This is agreed and is identified within the evidence base on playing pitch and sports provision, together with the open space assessment. These spaces	No change

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				require significant investment against a backdrop of significant funding reductions. Developer contributions can provide a mechanism to support additional investment.	
3 Spatial Portrait	3.1.19	Queen's Park Area Residents Association	Ambitious plans set out in 'Shaping a Healthier Future' have been undermined by funding cuts. The Council needs to hold the NHS to account on resident health care impacts. In addition it needs to properly plan to meet key worker housing needs to support the sector.	The Council does work closely with Health providers through the multi-agency Health and Well-being Board. It is aware of the pressures on key-workers related to housing. There are a number of intermediate affordable housing tenure products that are relevant and available to key workers. Previous attempts at specifically reserving affordable homes for key workers have not always proved successful and in some cases resulted in empty properties due to lack of take up. The Council will consider the merits of this accommodation where it is promoted within a development, but for the most intermediate tenures will meet this need.	No change
3 Spatial Portrait	3.1.20		Issues reflect over-population and poor self-diagnosis. Reduce in-migration and improve health education.	In-migration will not stop unless alternative housing provision is made elsewhere to meet demand. The CCG is working to ensure	No change

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				unnecessary trips to acute services and GPs are avoided through promoting alternatives such as using phones or web chat for initial diagnosis rather than automatically turning up at those facilities.	
3 Spatial Portrait	3.1.20	Manjul Shah, Mitesh Mashru	The scale of older people's housing needs should be set out in 3.1.4.	This matter is specifically addressed in the housing chapter.	No change
3 Spatial Portrait	3.1.23	Martin Francis	More thinking needed on long-term future of 'shopping' versus services in town centres	Agreed. The Plan seeks to ensure that there is sufficient policy support to allow additional retail where required, but also allow for alternative uses to support town centres where appropriate.	No change
3 Spatial Portrait	3.1.23	Queen's Park Area Residents Association	Support town centre improvement and separating people from traffic, but recognise limited scope to do this. Minor changes to Salusbury Road indicate however what can be done through small interventions.	Agreed. Improvements to the public realm can improve centres, with the most recent large example being at Kingsbury. Town centre action plans in the priority town centres will identify the range of measures required.	No change
3 Spatial Portrait	3.1.23	Quintain	Support challenge to better meet Brent's shopping needs locally but want sufficient flexibility to allow centres to evolve in a dynamic retail environment.	Agreed. The Plan seeks to ensure that there is sufficient policy support to allow additional retail where required, but also allow for alternative uses to support town centres where appropriate.	No change

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3 Spatial Portrait	3.1.24	Martin Francis	Stadium Views: Protection has not been successful; the policy needs to be strengthened. Metroland and open spaces: need recognition as key parts of Brent's heritage.	The policy wording proposed is stronger. The revised policy would however benefit from more detailed analysis of the views as it is apparent that the buildings that are currently being constructed have reduced the prominence of the roof and arch, particularly from the south west and the east. The Heritage Strategy will address the best parts of the Metroland character that remain. The open spaces and parks are protected from inappropriate development by policy.	Reconsider tall buildings strategy/ views of the Wembley stadium and arch. Identify relevant foreground and background views on the policies map.
3 Spatial Portrait	3.1.24	Queen's Park Area Residents Association	Conservation areas: more could be made of their value to life. Public parks: important part of 19th century cultural heritage and require judicious management to endure.	Noted. It is considered that sufficient prominence is given to their importance. Agreed. The management of parks is outside the control of planning policy.	No change
3 Spatial Portrait	3.1.25		Night time economy: Unsafe for tourists - so strange to promote it	The night time economy doesn't have to be based on alcohol dependent events, the cultural strategy and offer of the night time economy can be more inclusive to support a range of activities that ensure a feeling of greater security.	No change

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3 Spatial Portrait	3.1.25	Theatres Trust	Cultural and creative spaces: welcome recognition of challenges they face.	Noted	No change
3 Spatial Portrait	3.1.27	Queen's Park Area Residents Association	Green spaces: lack of clarity on how under-provision will be remedied, with many development sites away from them.	Noted. Further development of an open spaces strategy will provide greater clarity/ input into policies to identify specific needs from development. Given the scale of development required, it is unlikely that new sites will provide sufficient space to overcome identified deficiencies. There will however be additional public open space provided where possible/ appropriate.	Amend BGI1 to provide greater clarity on standards of provision sought on site, or need for off-site contributions in-lieu.
3 Spatial Portrait	3.1.27	Canal & River Trust	Open spaces: support improvements and wish to work in partnership with Brent to improve canal resources and connections to green spaces	Noted.	No change
3 Spatial Portrait	3.1.27	Martin Francis	Open spaces: Lack of pursuit of Green Flag standard will reduce quality of parks. Within development more naturalistic planting should be encouraged. Chalkhill provides an example of how a new open space encourages social cohesion. Role of spaces in addressing climate change through tree planting and water management needed.	The standard of parks is maintained to the best level that it can be given the funding available. Alternative forms of management that offer better bio-diversity but do not compromise the quality of spaces are being pursued. The spaces could benefit in some cases from enhancement associated with addressing climate change and funding may become	No change

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				available for this through S106 off-set measures.	
3 Spatial Portrait	3.1.32	John Cox	Severance: Greater prominence required to identify and over-come.	Noted. This will be pursued on site allocations where appropriate and as part of the Transport Strategy Local Implementation Plan.	No change
3 Spatial Portrait	3.1.35	Martin Francis	North circular: Neasden is a block on cycling which needs urgent attention. Wembley: Bus network congestion needs addressing, particularly on event days with TfL and prioritisation throughout the route between Wembley Park and Central.	The North Circular and the pedestrian and cycling environment is being considered as part of the Transport Strategy Local Implementation Plan. Wembley: The Wembley Corridor is being considered currently, with implementation of changes addressed in the Local Implementation Plan.	No change
3 Spatial Portrait	3.1.35	Canal & River Trust	Canal freight: Welcome reference to its potential. Canal network: reference to new development contributing to the walking and cycling network along this should be added.	Noted. There is significant mention of good design principles related to the canal environment in site specific allocations and for example paragraph 6.6.31.	No change
3 Spatial Portrait	3.1.36	Brent Council (Schools Team)	Education: Needs to be more specific about areas pupils are drawn from compared to catchment areas defined for Brent schools.	Noted. This can be clarified in the text.	Amend paragraph 3.1.36. Replace first part of second sentence with: "School pupils and healthcare facility users

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					tend to cross borough boundaries...."
3 Spatial Portrait			Key diagram: Needs to be clearer on where change will be and what will look like.	Updating the key diagram have to be balanced up with the need for simplicity/ lack of information overload. The Place overview maps provide a greater opportunity to identify areas of change.	Update Place overview maps to provide more clarity on areas of change.
3 Spatial Portrait		Sam Dilliway-Davies	Housing: Need more affordable. Much private rental is poor quality and expensive for low paid. Harlesden: Expensive with many anti-social problems. Heritage & Culture: Borough of Culture 2020 supported Transport: Too many cars, poor cycling provision, bad air quality and waste HGVs.	Housing: The plan seeks to maximise affordable housing provision within the context of national policy and funding and address provision of better quality private rental. Harlesden. Noted. Transport: The Plan seeks to support changes of modes to reduce congestion and promote better air quality.	No change
3 Spatial Portrait		Noelita Edgard	Environment: Safer, cleaner and greener Brent supported. Housing: Supports new homes Employment: Supports new jobs and intensification of industrial areas for jobs and homes Infrastructure: greater clarity required to support growth Growth locations: supported. Town centres: more leisure, community and homes in declining centres supported. West London Orbital: supported.	Environment: Noted. Housing: Noted. Employment: Noted. Infrastructure: The Plan will seek to better address infrastructure provision where possible. Growth locations: Noted. Town centres: Noted. West London Orbital: Noted.	Infrastructure: Provide clarity on infrastructure required wherever possible.

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3 Spatial Portrait		Kevin Barry	Section contains platitudes and obvious statements.	The section seeks to provide context for the challenges faced and how this should influence what the Plan seeks to address.	No change
3 Spatial Portrait		L&Q	Housing: Will support Council meeting and exceeding final London Plan housing target including affordable and family housing, with mixed use and tenure development and regenerating existing poor quality homes.	Noted.	No change
3 Spatial Portrait		Andy Brommage	Sustainable Development: Mention goals and how plan meets them.	This is an important matter and worthy of inclusion. The Integrated Impact Assessment considers the impacts of policies in relation to sustainable development objectives, as such the matter has been addressed in the Plan, but it could be made clearer.	Add at the end of paragraph 3.1.5. "In planning for Brent's future, the Council has been mindful of the commitment the United Kingdom made to the United Nation's 2030 Agenda for Sustainable Growth and how this can be best delivered. The Integrated Impact Assessment embodies the 2030 Agenda principles within its objectives. All proposed policies in the Plan are have been assessed against these objectives. They seek to fairly

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
					balance the key pillars of social, economic and environmental sustainable development."
3 Spatial Portrait		David Goodwin	Growth Areas: Why not more?	The Growth Areas represent known areas of critical mass, they do not mean that development will not occur in other areas, it will just not be of such a significant scale.	No change
3 Spatial Portrait		Elizabeth Lindsay	Housing: More Council homes and home renovations required.Jobs: more needed in social endeavours - CNWL leavers could provide social enterprise services	Housing: The Plan seeks to provide more social rented homes. The Council is progressing its own development programme to build and refurbish properties.Jobs: The Plan seeks to create the link between jobs provided and local people. This matter is however one which is a 'grey' area in terms of what it is reasonable to expect a development to undertake in relation to planning legislation and relies to a large extent on developers being supportive of measures, rather than being compelled.	No change
3 Spatial Portrait		Sport England	Vision: would benefit from greater reference to sport, recreation, activity or health. Places: would benefit from greater reference to sport, recreation, activity or	The vision is succinct however in relation to all representations received on health, a reference to it is considered appropriate. The spatial portrait could make better	Include within the spatial portrait better reference to sports and recreational facilities in the social infrastructure section.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>health and actions/recommendations in the Council's Playing Pitch Strategy and Indoor Sports and Leisure Needs Assessment. This would clarify what sports facilities/actions need to be delivered to meet identified current and future sporting need.</p> <p>Playing pitches: NPPF paragraph 97 require playing fields protection not just the playing pitch. References should, therefore, be amended.</p> <p>Healthy streets: Should focus on active environments and reference to Sport England's Active Design within the policies with links to the guidance provided rather than just streets and travel</p>	<p>reference to sports and recreational facilities in social infrastructure.</p> <p>On the places it is agreed that better reference could be made to known sporting facilities improvements required.</p> <p>Amend reference to playing fields protection.</p> <p>Noted. Reference is made to Active Travel design in the public realm. The Council's SPD 1 makes reference to applicants considering Sport's England's Active Design when designing proposals.</p>	<p>Within the Places, make better reference to known required additional sports and leisure facilities or improvements to existing facilities.</p> <p>Amend reference to playing fields being protected, not just pitches.</p>
3 Spatial Portrait			<p>Air pollution: Major challenge not sufficiently identified in Plan with clear policies to tackle it despite earlier consultation responses identifying it as a major concern.</p>	<p>It is accepted that air pollution is a major challenge and could be more explicitly identified as such. In relation to policies this is not accepted. The matter is addressed in a number of ways, such as seeking to promote travel modes other than the private car and to ensure major developments are air quality positive in Growth Areas and neutral elsewhere.</p>	<p>Amend challenges in Sustainable Infrastructure to better identify air pollution.</p>
3 Spatial Portrait		Harini Boteju	<p>Challenges: Inter-connection between these could be better made.</p>	<p>Noted. The challenge is to support brevity whilst identifying</p>	<p>Review plan to identify where connectivity</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				that these issues are more often than not interconnected.	between issues can be identified whilst respecting the need for brevity.
3 Spatial Portrait		HUDU/ Brent CCG	Challenges: Ensuring timely provision of adequate health and community infrastructure which has suffered from significant under-investment.	Agreed that this is a priority. The Council will seek to ensure development does what is appropriate to support new health care provision. This however requires clear advice and specifications and reasonable requests set out by the CCG.	No change
3 Spatial Portrait			Wembley Park: too high, too dense. Environment: Too much pavement parking and fly-tipping.	Wembley Park: The density/ height reflects the need to accommodate new homes and jobs and its public transport accessibility. Environment: Pavement parking can be enforced through parking legislation and fly-tipping through environmental legislation. The Plan seeks to ensure that with regards to parking and waste new development satisfactorily mitigates impacts.	No change
3 Spatial Portrait			Spatial Portrait: Term is jargon	Noted. It might be appropriate to change the title.	Amend Spatial Portrait title to borough characteristics.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
3 Spatial Portrait		P Davies	Tall Buildings: Ignore own policies in Alperon - how will this improve?	Tall Buildings: The plan seeks to identify appropriate heights. In the context of London, Brent has limited environmental designations that limit what would be considered appropriate heights. This is made clear in GLA representations on this Plan too. As such as with all policies contained within it the policies need to be read as a whole as well as taking account of other material considerations when making a decision. On occasion this may mean other deliverables outweigh the height policy.	No change

SPATIAL VISION AND GOOD GROWTH

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
4 Spatial Vision and Good Growth	Figure 6	John Cox	Page 7 map: Church End growth area should be elongated to the west, to span the railway line and reach Brentfield Road.	Currently this area is separated from Church End by railway tracks, with no planned connections over the line. The public transport accessibility on the other side of the line is weak. As such it is not considered that there is suitable scope for this area to be considered as a priority location for new development. This might change for example if a new station on the West London Orbital was planned in this area once the line is up and running, or significant infrastructure was provided to enhance movement across the railway line.	No change
4 Spatial Vision and Good Growth	Figure 6	Vardy Limited	1-2 Dowling Parade, Bridgewater Road's inclusion in an intensification corridor and its potential for mixed-use employment and residential uses is supported.	Noted. The Council will use the masterplan submitted to consider the potential of the corridors in further work it undertakes to support the policy.	No change
4 Spatial Vision and Good Growth	Figure 6	OPDC	Inclusion of the OPDC boundary within the key diagram is welcomed. Suggested amendments:-Label Old Oak and Park Royal Development Corporation on the figure to ensure consistent labelling with	These suggested changes to provide consistency across the key diagram are considered appropriate.	Label Old Oak and Park Royal Development Corporation on the figure to ensure consistent labelling with other local

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>other local planning authorities.-Remove Key Open Space from adjacent to First Central site. OPDC's Local Plan provides guidance for the publicly accessible open spaces.-Remove Grand Union Canal from the OPDC area to ensure consistency with depicting water routes outside of the borough.-Continue the route of the West London Orbital route beyond the OPDC area is clarify the route will not terminate in the OPDC area.-Include the icon for the Old Oak Common Victoria Road Station to ensure consistency with depiction of other stations.</p>		<p>planning authorities.Remove Key Open Space from adjacent to First Central site. OPDC's Local Plan provides guidance for the publicly accessible open spaces.Remove Grand Union Canal from the OPDC area to ensure consistency with depicting water routes outside of the borough. Continue the route of the West London Orbital route beyond the OPDC area is clarify the route will not terminate in the OPDC area.Include the icon for the Old Oak Common Victoria Road Station to ensure consistency with depiction of other stations.</p>
4 Spatial Vision and Good Growth	DMP1	Sam Dilliway-Davies	<p>Add that development should not be contributing to climate change, and instead should be carbon neutral? Development should contribute to employment opportunities such as the developers taking responsibility for local apprentices, work experience and T</p>	<p>Climate change is important, and the plan together with policies in the London Plan addresses this matter. Major developments are required to be carbon neutral. The employment section deals with encouraging development to</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Level industry placement students, with a relevant percentage target.	provide work opportunities for local people.	
4 Spatial Vision and Good Growth	DMP1	Kevin Barry	How is a non-planning expert, who hasn't got a couple of days to read and digest all the available material, supposed to respond to that question??	The question provided the opportunity to comment, you do not have to be an expert to respond.	No change
4 Spatial Vision and Good Growth	DMP1	Harini Boteju	DMP1 should explicitly better state the value of well-maintained green infrastructure for all development, particularly those adjacent to major roads. Tree canopies, hedges and other planting, such as cabled climbers, green roofing have a huge positive impact on reducing air pollution. Loss of forecourt greenery in private gardens is a large problem within Brent. The Mayor's Environment Strategy (2018) talks about this and would help support wording in this policy or another to retain planting; but also to have developers pay for maintenance where council resources are lacking. Cross-referencing to other sections within the Plan would be useful in the supporting text. The Trees and Design Action Group provide excellent guidance on the value of green infrastructure, worth referring to. In the Green Infrastructure chapter, the Urban Growth Factor (UGF) is mentioned, but quality of planting needs to be explicitly	There is sufficient reference to keeping existing green infrastructure of importance within Policy DMP1. Other policies within the draft Plan, in association with the London Plan and the Council's urban design guides provide clarity on the need for quality green infrastructure in association with development.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			required too, rather than a tokenistic planting plan of poor quality planting.		
4 Spatial Vision and Good Growth	DMP1	Sunil Shah	Over development will be a bad thing as it will reduce quality of living for the local residents with lack of recreation grounds as is planned for vale farm sports centre.	The Plan makes no reference to reducing Vale Farm's recreational value.	No change
4 Spatial Vision and Good Growth	DMP1	St George	Policy welcomed. Development design often responds to conflicting demands so some flexibility regarding amenity should be allowed for increased density, and the higher number of homes delivered.	Noted, it is accepted that different levels will be considered acceptable dependent on the location.	No change
4 Spatial Vision and Good Growth	DMP1	TfL Commercial Development	Generally supportive of Policy DMP1. The principle of development being considered acceptable where it is “provided with the necessary physical and social infrastructure” should be broadened to include sustainable transport infrastructure, to ensure that developments located in areas well served by public transport will be prioritised. “necessary infrastructure” can relate to both existing infrastructure and planned infrastructure, to be provided as part of proposals. “maintaining and enhancing sites of ecological importance” is supported, but suggest that further reference could reflect NPPF 2018 paragraph 175, which provides a methodology for schemes in sustainably	It is accepted that development should provide the appropriate sustainable transport infrastructure. This is dealt with more specifically in the transport chapter and also takes account of policies in the London Plan which require developments to satisfactorily address their transport impacts. The acceptability of potential adverse impacts on sites of ecological importance relate to the status of its designation, the magnitude of the impacts and the extent they can be appropriately mitigated. This matter for the purposes of determining applications is	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			mitigating impacts from development on such sites.	addressed in national and existing and emerging London Plan policy.	
4 Spatial Vision and Good Growth	DMP1	John Cox	A new first bullet point should be inserted saying: "Subject to other policies within the development plan, development will be acceptable provided it is: - successful at reducing spatial inequalities and successful at increasing publicly-accessible physical space within the borough, unless it is of such an exceptional nature or of sufficiently small-scale that permission is justified"	Bullet point two is considered to be sufficient for addressing the accessibility of development.	No change
4 Spatial Vision and Good Growth	DMP1	Philip Grant	Policy sets out some important guidelines. Wording allows good policies to be ignored when it suits planners and developers to do so!	Development should be in accordance with policies in the development plan, unless material considerations indicate otherwise. There will be some occasions where policies promote competing priorities which cannot all be delivered. The weight placed on different policies depends on the characteristics of the development and other circumstances at the time.	No change
4 Spatial Vision and Good Growth	DMP1	Environment Agency	Generally supportive. The following amendments should be made:Point 5 - to: 'and maintaining AND enhancing sites of ecological importance;' This should be the minimum rather than maintenance on	The policy as worded sets out minimum requirements for development. It is accepted that better outcomes should be an aspiration for the planning	Amend DMP1 to:Bullet point 4: 'conserving and where possible enhancing the significance of heritage assets and their

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>its own. Point 7 - to: 'not unacceptably increasing, AND WHERE POSSIBLE REDUCING, exposure to flood risk, noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality; These environmental risks should be reduced as well as promotion of the improvement of water quality through the planning process. Point 8 - to: 'retaining existing blue and green infrastructure including water ways, open space, high amenity trees and landscape features AND providing appropriate additions or enhancements WHERE POSSIBLE; and 'Retention of blue and green infrastructure is not enough as planning policy should aim to promote enhancements wherever possible.</p>	<p>process. At appeal the test of acceptability of a scheme as a minimum generally relates as to whether it satisfactorily addresses its potential adverse impacts, i.e. does not cause unacceptable harm. On balance however it is considered that a more positive outcome for developments should be encouraged in the policy, as this is currently for the most part reflected in the supporting text. As such it is proposed to amend the policy to encourage enhancement where possible.</p>	<p>settings; 5: 'maintaining and where possible enhancing sites of ecological importance' 7: 'not unacceptably increasing, and where possible reducing, exposure to flood risk, noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality' 8: 'retaining existing blue and green infrastructure including water ways, open space, high amenity trees and landscape features and providing appropriate additions or enhancements where possible; and' 9: 'resulting in no loss of and where possible enhancing community facilities or other land/ buildings for which there is an identified need</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
4 Spatial Vision and Good Growth	DMP1	Apartments for London and Wembley Towers Limited (owners of Wembley Point and surrounding land) and Stonebridge Real Estate Development Ltd (Unisys site owner)	Generally support subject to a few suggested modifications. Proposed Modifications: In this respect it is important to widen the reference to development being acceptable where it is provided with the necessary physical and social infrastructure to relate to both existing infrastructure and planned infrastructure (the latter of which could be supported by the future development or via a culmination of this and other developments' contribution in the area via CIL). Furthermore, the necessary requirements in terms of identifying acceptable development criteria, should also include ensuring that developments located in areas well served by public transport are prioritised.	The 3rd bullet point is considered to satisfactorily address infrastructure requirements, at the time of the application the availability of existing of planned infrastructure to make the development acceptable will be reviewed. The Plan's strategy prioritises development near public transport by identifying appropriate sites and places such as town centres. Whilst such sites are prioritised, the Council cannot refuse a development unless it causes adverse impact on the movement network, or is so deficient in its accessibility that it is not regarded as sustainable development.	No change
4 Spatial Vision and Good Growth	DMP1	Quintain	First bullet point of this policy should be applied appropriately taking account other policies in the Plan, particularly in Growth Areas.	Noted. Greater clarity is provided in site specific and place policies.	No change
4 Spatial Vision and Good Growth	DMP1	Thames Water	Support wording but consider policy needs to reflect fact that new development may put sensitive receptors in close proximity to existing sources of noise, odour or light. This should not be allowed unless it has been demonstrated	This is satisfactorily addressed in the 7th bullet point, applying to the potential introduction of these factors to existing adjacent occupiers, or a new development's	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			that there would be no adverse impact on amenity of future occupiers and mitigation measures have been secured.	exposure to these factors that might already exist in an area.	
4 Spatial Vision and Good Growth	DMP1	Canal & River Trust	Welcome that retention of existing blue spaces is seen as so significantly important that it features in the cross-cutting development management policy in the plan. We would suggest that the aim should be to retain and enhance blue infrastructure so that it is better able to meet the needs of the growing population in the borough and help the council mitigate for open space deficiencies, especially around Alperton. We note that policy BG11 does focus on both retention and enhancement so our suggested amendment to policy DMP1 is made in the interests of internal consistency, rather than the soundness of the plan as a whole. We would be happy to discuss with you how a waterspace strategy for Brent could frame how developments interact with and support or enhance our waterways.	The Plan has to be read as a whole and as such the enhancement of blue infrastructure is considered to be satisfactorily addressed in BG11.	No change
4 Spatial Vision and Good Growth	4.1.1	Martin Francis	Higher density housing should only be supported where accessible and high quality green space is provided. It should not be to the detriment of meeting and exceeding minimum proximity and daylight requirements as unfortunately	The Plan seeks to prioritise new development in accessible locations and ensure that high quality green space is provided through a variety of policies, e.g. on site amenity space standards,	No change

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			<p>has been the case with some Quintain zone developments.</p> <p>For a healthy borough, a long-term plan for youth provision is required.</p> <p>Creating balanced communities should not be used as a pretext for gentrification of existing mainly social housing estates such as St Raphael's.</p> <p>A more specific definition of 'affordable' is needed relating to the median income of Brent households.</p>	<p>delivery of the Urban Greening Factor targets, etc.</p> <p>Access to acceptable levels of day light and sunlight will be sought when approving planning permissions.</p> <p>Creating mixed and balanced communities is not a pre-text for gentrification. As can be seen in South Kilburn, re-provision of high quality social rent homes is a priority for the Council, nevertheless it relies on sufficient funds generated to subsidise its delivery, which is heavily reliant in many cases on private housing development.</p> <p>The link between incomes and affordable homes is made in London Plan policy. Nevertheless, at a national level there is no such connection. The Council will do what it can to ensure that truly affordable homes are prioritised, however there will also be homes that are made available to those with incomes that realistically could afford market rented homes, but who cannot otherwise afford to buy unless obtaining intermediate affordable tenures.</p>	

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4 Spatial Vision and Good Growth	4.1.1	Pocket Living	Overarching Borough vision including the objective of providing the homes that people need is welcomed. Pocket Homes wish to emphasise the role (within this high level Vision) that the delivery of innovative forms of housing can make towards meeting the needs of specific groups and therefore the borough's population as a whole. It seeks to ensure that such potential contribution is not unduly or inadvertently restricted.	Noted. Where consistent with the Plan this will be supported, however, such innovations whilst supporting delivery will not form substantive elements of additional provision and as such do not warrant inclusion in the vision.	No change
4 Spatial Vision and Good Growth	4.1.2	Martin Francis	'No policy' needs explanation.	This is considered to be sufficiently addressed in the document as to why a no policy alternative would not be considered appropriate.	No change
4 Spatial Vision and Good Growth	4.1.3	Queen's Park Area Residents Association	Particularly support paras 4.1.3 – 16. No mention is made to over-development of existing properties – loft and side extensions, basements – nor to considering the detrimental effects of works to residents while being undertaken – Considerate Constructors' Scheme, noise, dust, traffic plan, over prolonged periods. These should be included when planning applications are being considered. It should be emphasized in the plan as well as referring to the relevant SPDs.	Noted. This is addressed in the Brent Residential Extensions Guide SPD2, Basements SPD and Brent Design SPD1	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
4 Spatial Vision and Good Growth	4.1.7	St George	Regarding draft paragraph 4.1.7 , consideration should still be given to the surrounding area, but flexibility ought to be afforded to proposals where a different layout, density, design or scale can be shown to successfully be achieved.	Noted. It is considered evident that this flexibility exists as can be evidenced by the changing character of parts of the borough in moving towards higher density and taller developments.	No change
4 Spatial Vision and Good Growth	4.1.10	Martin Francis	Support appointment of a 'Heritage Champion' who should lead a review, based on public participation aimed at including potential new heritage sites.	Noted.	No change
4 Spatial Vision and Good Growth	4.1.15	Martin Francis	Council should increase profile of the Assets of Community Value process and streamline application process, giving local people more sense of ownership.	Noted. The process has to be consistent with regulations to ensure that the interests of both proposers and building owners are respected.	No change
4 Spatial Vision and Good Growth	4.1.16	Quintain	More detailed analysis is required to ensure Growth Areas and site allocations development capacities are as accurate as possible.	The Council has made reasonable assumptions of capacity using a number of mechanisms, e.g. standard densities, knowledge of comparable site development, detailed designs, estimates provided by developers, etc. It is accepted however that until tested through more detailed design associated with an application that assumptions are estimates. The best information available at the time will be used.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
4 Spatial Vision and Good Growth		Harini Boteju	Poorer aspects of Brent need to be recognised. Vision should 'honorably' acknowledge Brent is not as good as it could be or just delete the first line. Vision should include futureproofing which is really important in relation to development and climate change. Line 3 mentions 'shared prosperity', unclear as to what this means.	Noted. The spatial portrait is considered to be balanced and highlights aspects of Brent that could be improved. Climate change is important, and the plan together with policies in the London Plan addresses this matter. Shared prosperity relates to a desire to ensure that no groups are left disadvantaged to such a degree that they are in poverty.	No change
4 Spatial Vision and Good Growth		Quintain	Delivering Homes to Meet Brent's Needs: Recognise that LBB are objecting to Draft London Plan housing targets for Brent. Bullet point 2 should refer to all affordable tenures, including London Living Rent and Affordable Rent, to ensure Brent retains diverse and inclusive communities. Object to imposition of a preferred mix on private and intermediate housing which is inconsistent with H12 of the draft London Plan and should therefore be deleted.	The point identifies the priority tenure to meet needs. The Council is not imposing a preferred mix, it is seeking to ensure a reasonable proportion (25%) of 3 bed+ homes are provided, when the market currently prefers to provide 1 and 2 bed and needs have been identified at >65%.	No change
4 Spatial Vision and Good Growth		Kevin Barry	Disappointed no strong vision emerges	Noted. The response would have benefitted from suggested changes to improve it.	No change

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4 Spatial Vision and Good Growth		Sunil Shah	No ghetto of high rise tower blocks	Tall buildings will be accommodated. Good design and mixed tenure developments will seek to ensure that these are sustainable development for the longer term.	No change
4 Spatial Vision and Good Growth			Great to "Tackle congestion and air quality around the North Circular" but must not be limited to there but ALL areas of illegal air pollution. Please expand "Brent's award winning street tree planting initiatives"!	Noted. This is a particular hotspot, but its reference does not reduce policy outcomes elsewhere related to improving air quality through reducing emissions and providing mitigating measures.	No change
4 Spatial Vision and Good Growth		Noelita Edgard	Brent will grow and develop with these plans, being a better place to live in. Jobs will bring in money; employment will give people jobs.	Noted.	No change
4 Spatial Vision and Good Growth		Environment Agency	Invasive Non-Native Species ParagraphWould like addition to either the introduction for each local area, or within the Spatial Vision section 4, to highlight the plan's aims 'to manage and if possible eradicate invasive non-native species for the safe enjoyment of green and blue spaces for residents.'	This matter is addressed in relation to policy BG11 Green and Blue Infrastructure in Brent.	No change
4 Spatial Vision and Good Growth			Shows long term vision but unclear how busy areas such as Wembley, Harlesden and Willesden will be affected	The place policies and site allocations for those areas try to provide clarity on the development implications and how areas will be affected.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
4 Spatial Vision and Good Growth		L&Q	Supports policies that: <ul style="list-style-type: none"> • ensure optimised housing delivery; • create mixed, inclusive communities across a range of tenures; • maximise the provision of affordable homes; and • promote the delivery of good quality market rented properties. 	Noted	No change
4 Spatial Vision and Good Growth		Roccopia Investments Ltd	Support priority of building 'Strong and Inclusive Communities' and 'Making Best Use of land' priorities use of brownfield land in sustainable locations and assists in protected greenfield land. Increasing densities on sites identified in sustainable locations should be a priority.	Noted.	No change
4 Spatial Vision and Good Growth			New developments needed and welcome, yet should also consider "Building Better, Building Beautiful Commission" recommendations making aesthetics part of the development strategy.	Good design policies and guidance are pursued in the Plan to ensure a high quality of development wherever possible.	No change
4 Spatial Vision and Good Growth		Kevin Barry	Vision unclear. Willesden Green or Cricklewood should be growth areas.	Noted. Insufficient quantum of development has been identified for Willesden Green and Cricklewood for them to be specifically identified as growth areas. This does not mean that they will not be subject to development proposals.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
4 Spatial Vision and Good Growth		Robert Donovan	No more growth, improve what Brent already has	Noted. Avoiding growth is not an option as it will be required to be in conformity with national and London Plan policy.	No change
4 Spatial Vision and Good Growth		Philip Grant	Use Plain English rather than a term like "Spatial Vision"! Gives the impression planning should be left to "the professionals". Spatial Vision headline statement reads well, but based on past experience, I have little confidence that the Council will deliver on this promise. How can 'Prioritising development in new and more efficiently and intensively developed Growth Areas such Northwick Park' fit in with 'retaining existing blue and green infrastructure including water ways, open space', when Northwick Park IS the most important open space in North West Brent?	Seek to use more easily understandable language wherever possible. There is no proposal to build on Northwick Park to cause a reduction in the green space available. The Council will seek to improve the quality of the space and its surroundings, e.g. by potentially removing the changing room/pavilion and returning this to open space whilst re-providing this facility within the built up area.	No change
4 Spatial Vision and Good Growth		HUDU/ Brent CCG	Policy DMP1 Development Management General Policy There is no reference to contributing to health and well-being of residents/communities, which is an omission given the integrated health planning approach set out on page 27. We suggest an additional bullet "contributing to the health and well-being of the borough/its communities" The justification for this amendment	The issue of promoting health and well-being is fundamentally addressed by the other points in the policy. On Health Impact Assessments, the Council would like to see some evidence that they result in changes in outcomes.	No change

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			includes the existing high levels of ill health and levels of deprivation as well as conformity with the NPPF and PPG Reference to the use of Health Impact Assessments as a recognise tool to help should be included here and added to the glossary.		
4 Spatial Vision and Good Growth		St George	Welcomes aim to make the best use of land including prioritising development in new and more efficiently and intensively developed Growth Areas. Welcome making better use of employment land through intensification and also, where appropriate, supporting additional housing through co-location. The Grand Union development (Ref 18/0321) demonstrates successful co-location. The intention to maximise housing delivery is welcomed, particularly to a level which meets the draft London Plan targets. St George delivers developments which seek to create a community that new and existing residents feel part of. As a result, the LBB's aspiration to deliver inclusive communities across a range of tenures is welcomed.	Noted.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
4 Spatial Vision and Good Growth		London Borough of Harrow	Growth areas are welcomed. Further dialogue between Harrow and Brent would be welcomed to ensure those located on the common border between the two boroughs are brought forward in the most appropriate manner.	Agreed that discussions should be undertaken to mutually support appropriate opportunities along the edges of each borough.	No change
4 Spatial Vision and Good Growth		Greater London Authority (GLA)	Welcome that Good Growth is embedded in the Brent Local Plan at the outset.	Noted.	No change
4 Spatial Vision and Good Growth		Rita Valentini	Purposes of potential growth are clear. Each area is considered on his own and not together, e.g. connections and facilities.	Consideration was given to more strategic elements that cross borders. Where possible these have been identified.	No change
4 Spatial Vision and Good Growth		Manjul Shah, Mitesh Mashru	Scale and location of housing is key. Needs to be adequate provision in both the growth and opportunity areas supporting high density schemes, as well as the suburbs with smaller schemes.	The Plan seeks to meet these balance by concentrating most growth within defined areas whilst allowing appropriate smaller scale development in the wider suburbs with good access to public transport.	No change
4 Spatial Vision and Good Growth		TfL Commercial Development	Support the principles of good growth set out within Chapter 4, including large-scale redevelopment in Growth Areas such as Neasden, Alperton and Wembley. Strongly support the principle of higher density development being encouraged in Brent's town centres and in areas with good accessibility to public	Noted. The issue of co-location and intensification is dealt with more thoroughly in the employment chapter.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			transport, in line with Policy H1 of the Draft London Plan. Also welcome support for intensifying employment land uses, including the colocation of industrial uses with residential where suitable. To provide additional clarity for land owners and developers regarding colocation and industrial land release, Brent should include further detail within this section to the effect of “the London Plan is clear that industrial land release should be managed through the Local Plan process. Brent will establish a clear approach to deliver industrial intensification and release, where appropriate”.		
4 Spatial Vision and Good Growth		HGH Consulting (on behalf of unnamed clients)	Ambitions for regeneration as identified in the Growth Areas supported, but heights and density should not unnecessarily limit the scale of appropriate development.	Noted. The plan seeks to provide a balance between optimising development and providing certainty to all parties on what is likely to be considered acceptable. It does however not mean that well designed schemes with evidence that supports a departure from policy will not be considered on their merits.	No change
4 Spatial Vision and Good Growth			Document repeatedly states high rise buildings have "appeared" as though this is by magic. Also constant reference to student accommodation - that built	The trend for tall buildings to be promoted by developers post 2010 in suburban locations was not a significant consideration in the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			around Wembley is sub-standard and its undue prevalence has removed any sense of community from the area. Brent is building a legacy of cramped flats for families, with no outside space - have we learned nothing from the 1960s and 70s?	policy content of the Brent Core Strategy and Site Allocations Plans. As such the policy context for their assessment was relatively undeveloped. This is something this plan seeks to address. The statement student accommodation is sub-standard and has adversely affect a sense of community is not accepted. Neither is the reference to cramped flats for families, as all new builds are set at generous minimum sizes. Brent has higher than London Plan amenity space standards and new build developments provide generous provision. The properties being developed have learned from the mistakes of the 1960s and 70s. They are of high quality design, warm, sound-proofed, mixed tenures and have proper management and maintenance regimes.	
4 Spatial Vision and Good Growth		Greater London Authority (GLA)	Welcome recognition of target set in emerging London Plan, but as Brent's target is inconsistent with this Brent will have to conduct a new Local Plan review as soon as the London Plan is published. The GLA considers the SHLAA and small	Noted, but not agreed. The EIP sessions indicate sufficient evidence that the Inspectors have concerns about the robustness of the GLA's small sites' capacity assumptions. Nevertheless, if a	Change the small sites capacity to that consistent with the West London Small Sites Capacity Study 2018, unless the Inspectors recommend

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			sites methodology sound and as such this should be reflected in Brent's emerging local plan targets.	higher 'windfall' small sites figure is set for the borough in the London Plan than is assumed in this draft, then this will be taken forward in any plan that Brent submits for examination.	that a higher figure than is set out in the draft Brent Local Plan for small sites is required.
4 Spatial Vision and Good Growth		Universities Superannuation Scheme (USS)	The first point of the 'Good Growth' Policy should allow flexibility between uses on employment land to adapt to markets and ensure units can remain occupied and vibrant. NPPF paragraph 120 states planning policies and decisions need to reflect changes in demand for land and paragraph 11 a) states that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. "Making Best Use of Land", which supports higher density development in areas with good accessibility to public transport is supported.	The draft London Plan requires Brent to 'provide capacity' for industrial uses and as such the Brent Plan does not seek to encourage the net loss of employment space, although it does encourage flexibility to encourage the best use of land through 'intensification' and 'co-location'.Noted.	No change
4 Spatial Vision and Good Growth		John Cox	Spatial Vision should be changed from 'Good Growth' to 'Inclusive Growth'. 'Inclusivity' to should not be relegated to one of its six sub-headings, to be forgotten. The concept should pervade, by default, all planning policy in the borough. Increasing wealth disparity, arising from asset value growth and	Good growth covers more than inclusivity. The policies in the Plan seek as far as possible as is available through spatial planning policy to ensure better outcomes for those traditionally marginalised when balanced up against other requirements.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			widening income differences, has resulted in widening gaps in the nature and quality of the built environment.		
4 Spatial Vision and Good Growth		HUDU/ Brent CCG	Brent Responsible Growth Strategy (RGS): Health Theme 2018 – 2038 shows Brent has a high level of poor health, including high levels of obesity and mental health, the highest cause of morbidity in the borough. However, there is no reference to improved health and well-being within the overall spatial vision for the Borough. This is in contrast to the ambitions of the borough and partners set out in the Borough Plan (Brent – Just Better) and the Brent Health and Wellbeing Strategy and other parts of the consultation document. We propose the following amendment: “Brent will continue to be a great place to live and work. Brent will welcome change and good growth concentrated in accessible areas that better delivers shared prosperity. This Local Plan will ensure a future built for everyone through regeneration to grow the local economy, improve health and wellbeing, and provide the jobs, homes, transport, green spaces and cultural assets that people need.”	It is recognised that Brent's population's health is a significant concern and something that needs improvement. The proposed amendment to the vision is considered appropriate.	Amend vision to include underlined to:“Brent will continue to be a great place to live and work. Brent will welcome change and good growth concentrated in accessible areas that better delivers shared prosperity. This Local Plan will ensure a future built for everyone through regeneration to grow the local economy, <u>improve health and wellbeing</u> , and provide the jobs, homes, transport, green spaces and cultural assets that people need.”

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
4 Spatial Vision and Good Growth		Theatres Trust	Supportive of vision and aspiration to provide cultural assets the community requires. Facilities for the arts and culture contribute towards social and cultural well-being, and help attract and retain talent and business within the local area. Retention and promotion of cultural facilities would help achieve wider objectives such as 'supporting strong and inclusive communities' and 'growing a good economy'.	Noted	No change
4 Spatial Vision and Good Growth		Greater London Authority (GLA)	Wembley Opportunity Area should be clearly identified on proposals maps and policy should reflect its London Plan policy to 2041. Welcome identification of areas suitable for tall buildings, such as at Wembley and Neasden. Sites at Colindale and Capitol Way Valley must only be considered sustainable if public transport is improved to accommodate further growth.	Agreed. There is a need to identify the boundary of the Wembley Opportunity Area and the emerging London Plan policy. Noted. Agree in principle, but if GLA is going to state this for the site allocations identified which have reasonable access to public transport, it is not clear why it is promoting a presumption in favour of small site development in areas which potentially have poor levels of public transport which are unlikely to be improved.	No change
4 Spatial Vision and Good Growth		Sam Dilliway- Davies	Good vision.	Noted.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
4 Spatial Vision and Good Growth		Universities Superannuation Scheme (USS)	The Falcon Park site needs flexibility to allow the site to adapt to changing employment needs.	This site has been identified for co-location which together with the London Plan's 'provide capacity' approach should allow flexibility to occur.	No change
4 Spatial Vision and Good Growth		Quintain	Support higher density development in town centres and in areas with good accessibility to public transport / PTAL ratings.	Noted.	No change
4 Spatial Vision and Good Growth		Quintain	Support ambition to build on Brent's status as London Borough of Culture 2020 by supporting inclusivity.	Noted.	No change
4 Spatial Vision and Good Growth		Apartments for London, Stonebridge Real Estate Development Ltd (Unisys site owner) and Wembley Towers Limited (owners of Wembley Point and surrounding land)	Support principles of good growth, opportunities for which can also be derived from an objective of overall regeneration. Proposed modification: Under 'Making the Best Use of Land' add in regeneration opportunities to the sites on which development should be optimised. Page 28. The requirement to provide 25% 3 bed or more homes is inconsistent with emerging London Plan Policy H12. In any case 2 bed 4 person homes should also be considered family sized homes as these are more than adequate to serve certain families' needs. Proposed modification: Reference to	The best use of land references focuses on those areas with best access to public transport. It doesn't automatically follow that intensive uses should be promoted on regeneration sites, if those are in areas of poor public transport accessibility. Noted. The Council and other London Boroughs have raised objections to this part of the London Plan. At this stage any such change to the Brent local plan is not considered justified as it would be inconsistent with meeting local housing needs. The	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			specific target for new family housing should only apply to low cost rent. A proportion of 2 bed 4 person homes should be allowed within the family homes definition.	need for 3+ bed properties takes account of nationally recognised standards in relation to children/ adults sharing rooms. Whilst 2 bed 4 people homes do meet some families' needs, this will not be the case for many where there are two or more different sex adolescent children, or other adults.	
4 Spatial Vision and Good Growth		Canal & River Trust	Support vision, keen to work to promote active travel and well-being outcomes through improvements to the canal network and engagement with local communities.	Noted.	No change

CENTRAL

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.1 Central	Other Policy Guidance	Quintain	This list should also refer to the original Stage 1 masterplan (ref: 03/3200) and the South West Lands Masterplan (ref: 14/4931).	Agree that the South West Lands Masterplan is relevant, the Stage 1 it is not clear of the relevance of this as it has been subject to numerous reviews/ more detailed work on the smaller areas, so is likely to cause confusion if referenced on its relative status compared to later work.	Add reference to South West Lands Masterplan (ref: 14/4931) in Other Policy Guidance.
5.1 Central	Figure 8	Quintain	Figure 8 should be updated to show recently completed developments. The VDC & Careys car park site should be removed from the designation of Key Employment Sites.	Agree that if a new base map is available that Figure 8 should be updated to show completed development and that further consideration of the SIL and LSIS boundary for key employment sites is required due to the borough's provide capacity status in the draft London Plan.	Amend Figure 8 to reflect updated development position and updated SIL and LSIS boundary for key employment sites.
5.1 Central	Figure 9	Quintain	Figure 9 should include Plot W12 (ref: 15/3599)	Agree, this is a site that has permission for replacement social infrastructure required as part of the redevelopment of an existing nursery.	Add to Figure 9 site W12 comprising 1610sqm of and/or A1-A4/B1/D1 and D2 uses.

5.1 Central	Figure 10	Quintain	<p>The W03 permission is 03/3200 and the plot is delivering 340 units.</p> <p>W06 is expected to complete Spring 2020.</p> <p>NW09 should be referred to as NW09/10 and will deliver approx. 396 units.</p> <p>NW10/11 should be referred to as NW11 and will deliver approx. 150 units.</p> <p>E03 a/b should be referred to as E03.</p> <p>Figure 10 should include Plot E05 (ref: 17/3021) which is delivering 458 units.</p>	Noted. The figures will be amended accordingly.	<p>Update Figure 10: W03 permission reference to 03/3200 delivering 340 dwellings.</p> <p>W06 completion Spring 2020.</p> <p>Amend NW09 to NW09/10 delivering 396 dwellings.</p> <p>NW10/11 amended to NW11 delivering 150 dwellings.</p> <p>E03 a/b amended to E03.</p> <p>Include Plot E05 (ref: 17/3021) which is delivering 458 units.</p>
5.1 Central	Figure 10	Quintain	Reference code for 1 Olympic Way is incorrect, should be 17/4538. Should prior approval for 3 Olympic Way be included?	Agree that reference code is incorrect. Prior approval for 3 Olympic Way should be included.	Amend Figure 10 to replace 17/4537 with 17/4538 and include the 17/3789 3 Olympic Way existing use Office and Permission Uses - Residential 60 dwellings
5.1 Central	BP1	Martin Francis	<p>a. Tall buildings limit daylight and create a claustrophobic experience. Current protected views policies are inadequate.</p> <p>d. Need to be clearer on which areas are included in "around Wembley Park Station"</p> <p>e. Same as (a) above</p> <p>f. Wembley Park and Wembley Central should be merged into one 'Place' and become a metropolitan centre</p>	a/e. In order to reduce their potential negative impacts, tall buildings will be concentrated in certain locations within the borough as outlined in the tall building strategy, and as referred to in policy BD1. The design and potential impact of such buildings, on significant assets such as the National Stadium Wembley, will be	No change proposed. Check with Quintain on the park - in terms of consultation and features it will incorporate.

			<p>j,k,l. This would be an ideal area for a green enterprise zone</p> <p>n. Object to a primary school on the York House site as it is unsuitable in terms of air quality, traffic and outdoor space</p> <p>o. Support re-naturalisation of the Wealdstone Brook, which should link to the lake in the new park</p> <p>p. Would like to see a more 'natural' park along the lines of Chalkhill Park, engaging local residents in its planning</p>	<p>thoroughly considered against a broad range of criteria as outlined in policy BHC1. The views of the stadium will be protected further through the new views policy BHC2 which has identified a number of new views to be protected</p> <p>d. Point 'e.' under 'HOMES' on page 36 of the draft local plan makes clear that development will be considered appropriate around Wembley Park Station where it is demonstrated that it can take advantage of the high Public Transport Accessibility Levels (PTAL). Developments in areas with high PTAL's (3-6) and around key transport nodes (within 800m) such as Wembley Park Station are deemed appropriate for intensification as outlined in policy H1 of the draft London Plan.</p> <p>f. For administrative purposes, Wembley Park and Wembley Central have been split, however, due to their size and linking, it is envisaged that they will eventually operate as one town centre with a long term aim of achieving Metropolitan Town Centre status as outlined in criterion G of policy BP1</p> <p>j,k,l Noted, this is not consistent</p>	
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				<p>with the planning permissions granted or received.</p> <p>n. The proposed school on the York House site has already been granted permission under 18/0204 and incorporates measures to address air quality, traffic and outdoor space to satisfactory levels.</p> <p>o. Noted.</p> <p>p. The park will be subject to public consultation and will include 'natural' areas which are important for biodiversity. The park's location in an area of high population density plus its accessibility to visitors on event days means it will have to be designed/ incorporate many features to address a variety of needs/ users.</p>	
5.1 Central	BP1	John Cox	Add to Policy BP1: "Safeguard land for all reasonably feasible future rail services this century, including adding platforms on the Chiltern Railways Aylesbury Branch at Wembley Park."	Whilst it may adversely impact on easier delivery of potential future transport schemes, unfortunately the Council cannot safeguard land for potential projects that do not have a reasonable prospect of coming forward over the life-time of the Plan.	No change
5.1 Central	BP1	Kevin Barry	Support. BP1 seems to be positive and make sense.	Noted	No change

5.1 Central	BP1	OPDC	Policy BP1 should be reworded to provide clarity. Clarification is needed on the evidence base justifying the quantum of town centre floorspace referred to. Reference to identifying Wembley as a future Metropolitan centre should be removed.	The floorspace quantum relates to the capacity identified in the Council's retail and leisure needs study. This can be referenced in paragraph 5.1.22 for clarity. The Council has consistently sought for Wembley to be identified as a Metropolitan centre as a result of the likely expansion of town centre uses related primarily to the development of Wembley Park. This potential is reflected in the draft London Plan. The current wording therefore is considered appropriate in the policy.	Amend paragraph 5.1.22 to reference the most recent Retail and Leisure Needs Survey.
5.1 Central	BP1	Giuseppe Dimichino	Objection to further residential development and the over-development of Wembley for residential use.	New additional homes are required to meet London Plan housing targets and provide homes for population growth in Brent. Wembley has very good access to public transport and facilities so is considered an appropriate location.	No change
5.1 Central	BP1	Sam Dilliway-Davies	Number of chicken and other fast food shops needs to be reduced to combat high level of obesity among young people.	The number of these types of shops are limited by existing policy DMP3 and proposed policy BE5	No change
5.1 Central	BP1	Quintain	Criterion:b. Supportc. Should refer specifically to the removal of the pedway. Support increased housing figure, and this should be referred to as a minimum figuree. Intensification should be	b. Noted. c. The current wording is broad and potentially encompasses a variety of improvements over the period of the Plan. On reflection paragraph	Amend the policy criterion:g) insert after floorspace "in addition to that already existing and consented" h) insert after

			<p>supported where PTAL levels are high, not just around Wembley Park Stationf. Supportg. Text should clarify that this is in addition to approvals secured by Quintain already. i. Supportk. Policy is not clear what is meant by a "greater proportion" of non-residential uses, as it is currently 100% non-residentialp. Should reference 7 acre park for consistency q. Support but should reference 2020 timetable for deliveryr. Support but should reference 2020 timetable for deliveryPlease refer to appendix 1 for proposed text changes</p>	<p>5.1.16 could give more information/ reference to schemes to improve the pedestrian experience improve the public realm.d. Noted. The current wording "over" implies more than rather than a minimum and is considered appropriate reflecting known opportunities, but also the need to accommodate a wider range of uses than just residential e. It is considered that the Plan takes adequate account of opportunities for intensification such as allocations, identifying where tall buildings are appropriate and specific site allocations.f. Noted. g. Agreed, amend policy wording to reflect this is additional capacity over that which already exists/ is consented. i. Noted. k. This means the allocations incorporating a requirement for a greater proportion of employment use than was previously the case, reflecting Brent's status as a 'provide capacity' borough in the draft London Plan. The wording could be improved for the sake of clarity.p. Noted - current policy reference is considered appropriate. Q and R. Noted. Amend paragraph 5.1.34 to be</p>	<p>one "additional" k) replace with "Introducing a greater proportion of employment floorspace in new mixed-use developments on Watkin Road and First Way to the east of the Stadium than allocated in the Wembley Area Action Plan"Amend paragraph 5.1.34 to incorporate the planned timetable for delivery of North End Road and First Way improvements to commence in 2020.</p>
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				more reflective of timescale for delivery.	
5.1 Central	BP1	Harini Boteju	There should be a requirement for development in Wembley to provide green roofing and walls. Existing masterplan for the area should be changed to require more green infrastructure.	Proposed policy BGI1 requires development to provide appropriate levels of green infrastructure in line with London Plan policy G5.	No change
5.1 Central	BP1	Florent Leblanc	Some existing businesses no longer fit in with the increasingly residential character of Wembley. Wembley should encourage sports and entertainment companies to come here.	Land and premises for business use class occupiers is still required in the borough, particularly with Brent being identified as a 'provide capacity' borough in the draft London Plan. Policy BE2 identifies some industrial sites which are suitable for co-location, with the remainder designated as suitable for intensified industrial use only.	No change
5.1 Central	BP1	Marion Bond	Support creation of new park in Wembley. Concern removal of pedway will impact on wheelchair/ disabled access.	Support for new park noted. Disabled access to the stadium will be provided. The current pedway is not DDA compliant in terms of its gradient.	No change
5.1 Central	BP1	TfL Commercial Development	Support parts (d) and (e) of BP1. The town centre boundary should be extended westwards to incorporate Wembley Park Station car park. Support part (t).	In the absence of any specific proposals for the Council to consider and recommendations within the retail and leisure needs study an extension of the town centre to cover the Wembley Station Car Park is not considered appropriate. As an edge of town centre site any proposal involving	No change

				a town centre use would have an elevated status in principle due to its 'edge of centre' location. The Council could consider the merits of any proposal on the basis of its contribution to/ impact on improving the vitality and viability of the town centre.	
5.1 Central	BP1	United College Group	Support the recognition of UCG's estate consolidation plan. Support policy BP1 however clarifications could be made to reflect the emerging London Plan and the significant contributions tall buildings can bring to Wembley.	Noted. Policy BP1 is supportive of tall buildings, as the Wembley Masterplan area has been identified as appropriate for tall buildings within the Brent Tall Building Strategy. This is in line with policy D8 of the Draft London Plan. The merits of any particular development related to height on UCG's sites of interest can be considered at the application stage when a more detailed scheme is proposed with the associated supporting detail.	No change
5.1 Central	BP1	Shruti Soni	Intensification of Wembley Park Drive is not suitable and development of 5-6 storeys would be detrimental to the family sized homes on Beechcroft Gardens. Around stations there is scope for tall buildings however the amenity of existing residents must be considered.	Developments within intensification corridors would still be subject to extensive design reviews, considering height and massing. These sites would be considered on a case by case basis and only be accepted once sufficiently scrutinised, with weight given to the impact on existing amenity by overshadowing/privacy concerns. The sites for intensification	No change

				corridors have been chosen due to their proximity to key transport nodes, and their position on wide roads so as to reduce impacts of scale. The homes on Beechcroft Gardens would be considered in regards to any proposed developments along Wembley Park Drive to ensure that adequate levels of amenity exist for remaining properties.	
5.1 Central	BP1	Vikram Soni	The intensification corridor proposed along Wembley Park Drive is not suitable for 5-6 storey development. 3-4 storeys would be more appropriate.	In the context of the need to provide additional homes in areas with good accessibility to public transport the potential increases in height are considered potentially appropriate. Other factors such as impacts on privacy, overlooking/over-shadowing and may reduce the height that is acceptable on any particular site.	No change
5.1 Central	BCSA1	Sam Dilliway-Davies	Support the allocated use and development of high-rise buildings. Such buildings should have larger balconies as well as storage for bicycles.	Policy BH13 requires appropriate levels of amenity space. The London Plan contains guidance on minimum balcony sizes. Safe, secure, accessible and plentiful bike storage is also required to be planned for new developments.	No change

5.1 Central	BCSA1	Historic England	The allocation needs greater clarity to ensure protection of Barn Hill Conservation Area. Analysis should be undertaken to examine the effect of tall development on the CA.	At a broad level the tall buildings strategy has considered potential for adverse impacts on conservation areas in its conclusions on recommending appropriate areas. The acceptable height of buildings reduces the closer to the conservation area. At the detailed application stage, with input from the Council's principal conservation officer the appropriateness of a development in terms of its impact can be assessed on an individual and cumulative basis and if necessary heights reduced where required to off-set potential for unacceptable adverse impact.	No change
5.1 Central	BCSA1		The plan for residential development on ASDA car park will not work and will create congestion.	The allocation promotes multi-storey development which will incorporate sufficient car parking to meet the development's needs. Potential adverse transport impacts will have to be adequately mitigated as part of any development scheme.	No change
5.1 Central	BCSA1	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The surface water drainage strategy should be consistent with London Plan policy requirements,	Noted. Text will be added to the infrastructure section to identify the requirement for additional waste water infrastructure capacity. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk	Amend infrastructure requirements to include reference to potential waste water facilities enhancement.

			including achieving greenfield run off rates. There are public sewers adjacent or on the site and it must be ensured these aren't damaged during construction.	issues are highlighted under planning considerations.	
5.1 Central	BCSA2	Tom Heinemann	Need to re-provide free parking. Make Wembley Park Drive one way with Empire Way the other way.	Free parking is not supported as it will increase the attractiveness of car use against a background of the council seeking to reduce it to improve air quality and reduce the need for junction improvements. Similarly one way systems tend to create poor environments that encourage excessive vehicle speed.	No change
5.1 Central	BCSA2	United College Group	It is accepted that BCSA2 and BCSA11 should be planned as one development, however there should be flexibility to achieve the benefits of UCG's estate rationalisation strategy alongside the council's strategic aims.	The policy provides the flexibility for the two sites to come forward independently although ideally the two should be considered together.	No change
5.1 Central	BCSA2	Thames Water	Do not envisage water capacity issues for this site. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change
5.1 Central	BCSA3	Environment Agency	Support the principle of an 8m setback from Wealdstone Brook. There should be a design principle to investigate naturalising the channel banks through redevelopment.	Support for setback is noted. Agree there should be a design principle to investigate naturalising the channel banks.	Amend design principles section to include a requirement that redevelopment of site should lead to naturalising

					channel banks where possible.
5.1 Central	BCSA3	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development.
5.1 Central	BCSA4, 6, 9, 12	Greater London Authority (GLA)	These sites are industrial in character and largely surrounded by industrial uses. Proposals for the introduction of residential uses on site would need to apply, as a minimum, an approach of no net loss of industrial floorspace and demonstrate that proposals would not compromise the remaining industrial uses surrounding the site.	The site has a current allocation within the WAAP which does not include re-provision of industrial. Mindful of the draft London Plan and Brent's provide capacity status, some re-provision of business floorspace has been sought within the policy. Nevertheless, complete re-provision is not considered practical given the size of the existing business premises and the alternative uses identified in the historic allocation of the site, plus other London Plan requirements for residential and other uses that might also be appropriate. As the 'agent of change' principle is now	No change

				within national policy, the Council will have to be assured that any proposed development does not compromise the functionality of adjacent business premises.	
5.1 Central	BCSA4	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development.
5.1 Central	BCSA4	Dominvs Group (majority landowner of site)	Support the proposed allocation, however the proposed uses should be expanded to include the potential for other leisure uses including hotel development. Proposed capacity should be increased to between 700-900 units. Timeframes should also be updated to indicate up to 400 units could be delivered in years 0-5 and 500 in years 5-10. It is premature to conclude that all buildings must be lower than the adjacent Wembley masterplan. Building height should be assessed as part of any pre-app discussion. Multiple site ownership is not a barrier to	Noted. This site will not be specifically allocated for hotel development, however, it is within close proximity to the national stadium Wembley. Provided on-site hotel provision is justified, and is in line with criteria outlined in policy BE9, it may be considered acceptable. The proposed capacity is indicative only, however, this does reflect the desired scale of the development, which should step down from developments within the Wembley masterplan. This will create a defined cluster	Remove multiple ownership risk from site allocation.

			comprehensive redevelopment of this site including the adjacent Generay site.	which does not encroach further upon neighbouring low-rise industrial and residential units, limiting the extent to which tall buildings will be appropriate as defined within the tall building strategy and supported by policy BD1. Noted. Multiple site ownership will be removed as a potential barrier to development.	
5.1 Central	BCSA4	Environment Agency	Support the 10m buffer zone from Wealdstone Brook including naturalisation of the banks. Recommend the inclusion of Water Framework Directive actions relating to fish.	Noted.	Add reference to seek in association with any development the incorporation a fish easement weir behind Elliot Close as part of the potential naturalisation/ channel enhancement works.
5.1 Central	BCSA5	United College Group	Wording is supported. It should be made clear that 17/5097 is not to be treated as setting formal parameters within which alternative schemes should be considered. The requirement for active frontages is supported.	Noted. The point in relation to 17/5097 is accepted, but reference to it is still considered appropriate in providing parameters on what the Council is likely to be comfortable with in terms of height and massing.	In planning considerations amend the second sentence to: "The site is suitable for a tall building, subject to this not adversely impacting on protected key views of the National Stadium, and does not fall within a Conservation Area or Archaeological Priority Area." In design principles, remove the first sentence.

5.1 Central	BCSA5	Thames Water	Do not envisage water capacity issues for this site. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change
5.1 Central	BCSA6	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development.
5.1 Central	BCSA6	Quintain	Object to the requirement for development to step down to the east end of Watkin Road. This could significantly limit the development potential of the site.	Taking account of the adjacent development of BSC4, plus the potential in the longer term for sites to the north east to be developed, it is accepted that the requirement to step down may well reduce the capacity of the site below what in the longer term would have been considered an appropriate amount. As such reference to this will be removed.	Remove the sentence: "Development will step down to the east end of Watkin Road." in the Design Principles section.
5.1 Central	BCSA7	TfL Commercial Development	Support the allocation, however the two sites included differ in character and will	Noted. The policy provides sufficient differentiation for the	No change

			<p>likely come forward for development individually. For clarity there should be two separate site allocations. Southern site: Capacity should be increased to 300+ units. Allocation should recognise potential for tall buildings. Site should be included within the Wembley Park town centre boundary and text amended relating to active frontages. Northern site: Policy on height should be more flexible.</p>	<p>development of the two sites, so the retention of one policy is considered appropriate. The proposed capacity is indicative however, this does reflect the desired scale of the development. For the southern site, the height within the policy takes account of the surrounding existing and likely context as one of transition from the Wembley Park development to the lower density residential character of Barnhill Conservation Area, the long term use of the Ark academy site for educational purposes and suburban development to the north. In the absence of a clearly defined main town centre development of the site and its physical separation from Bridge Road it is not considered appropriate to extend the town centre boundary to incorporate the southern site. Other policies allow the appropriateness of main town centre uses proposed as part of any application to be determined. Active frontages will be required along the ground floor of public facing areas to provide passive surveillance and increase safety, however, these have not been specified to be commercial. The</p>	
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				<p>scale of the desired development on the northern site is reflective of the character of its surroundings. The PTAL of 4, proximity to Forty Lane intensification corridor and the ability to 'step up' buildings mediating views of the recent Brook Avenue development to the south allows some greater height than existing buildings accessed from Forty Lane. Nevertheless, in the absence of a detailed scheme with associated evidence base which might indicate that some increase in height above the 4-5 storeys currently identified in the policy is acceptable, the current parameters are deemed appropriate.</p>	
5.1 Central	BCSA7	Thames Water	<p>The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.</p>	<p>Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.</p>	<p>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development.</p>

5.1 Central	BCSA8	Greater London Authority (GLA)	As a 'provide capacity' borough Brent should be seeking opportunities through its site allocations to intensify industrial capacity to satisfy the identified need.	Whilst it is accepted that Brent is identified as a 'provide capacity' borough, the site already has a commenced planning consent for a predominantly residential development. Should there be any potential desire to revisit the permission, then the opportunity to consider additional provision of workspace on site will be addressed. Nevertheless given the current consent status the opportunity to fundamentally review this site's redevelopment without developer support (of which there is currently none) to incorporate significant amounts of additional employment space is unrealistic.	No change
5.1 Central	BCSA8	Quintain	The delivery timetable is incorrect. Wembley Retail Park will be completed by 2026. The capacity of the site may be higher than the consented figure.	Clarity on the delivery timetable is welcomed. The capacity on the site identified reflects existing consent parameters, but in any case is identified as indicative. Any proposals to amend the existing consent so that it provides additional capacity on the site will be considered on their merits, but this is not something that the Council is actively encouraging given what is already an efficient use of the site and the importance of maintaining an appropriate	No change

				setting for what will be an open space of strategic importance within the Wembley Park development.	
5.1 Central	BCSA8	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development.
5.1 Central	BCSA8	Sport England	Object to the loss of football pitches. The allocation should stipulate their retention or replacement.	The provision of football pitches on-site was clearly identified by the developer and council as a meanwhile use in both this position and on the previous site from which they were moved. As such their re-provision on site is not considered appropriate.	No change
5.1 Central	BCSA9	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the

			surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.		earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development.
5.1 Central	BCSA10	Department for Education	Support the site allocation for a 3FE primary school at York House (BCSA10)	Noted.	No change
5.1 Central	BCSA10	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development.
5.1 Central	BCSA11	United College Group	Support the allocation. Indicative capacity should be increased.	The indicative figure was provided on the basis of not wanting to over-inflate potential residential dwelling numbers from allocations, bearing in mind the lack of certainty about where the CNWL would be relocated to, as many of these potential sites are also assumed to be residential. However, this assumption can perhaps be better incorporated into the housing	Revise the indicative dwellings figure to 155 dwellings.

				trajectory table that supports the Plan. As such the indicative figure will be revised in the allocation text to similar density of BCSA5.	
5.1 Central	BCSA11	Quintain	Indicative capacity should be increased to 275 units reflecting the gateway site location in a PTAL 6a location.	The indicative figure was provided on the basis of not wanting to over-inflate potential residential dwelling numbers from allocations, bearing in mind the lack of certainty about where the CNWL would be relocated to, as many of these potential sites are also assumed to be residential. However, this assumption can perhaps be better incorporated into the housing trajectory table that supports the Plan. As such the indicative figure will be revised in the allocation text to similar density of BCSA5.	Revise the indicative dwellings figure to 155 dwellings.
5.1 Central	BCSA11	Thames Water	Do not envisage water capacity issues for this site. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change
5.1 Central	BCSA12	Sport England	The allocation should make clear that the new development should retain or replace the current D2 facility.	The current D2 use a night club is effectively a non-conforming use on allocated industrial land. In terms of general additional sporting facilities, there are a significant number of gyms being accommodated in the commercial,	No change

				<p>hotel, residential and student accommodation buildings surrounding. The Council will through community access agreements in new schools and through upgrading its own facilities provide better public access to gyms/ leisure uses. It is not considered appropriate to seek re-provision of the existing D2 in this particular location compared to provision of additional employment space as specifically sought by the borough's provide capacity designation.</p>	
5.1 Central	BCSA12	Thames Water	<p>The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.</p>	<p>Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.</p>	<p>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development.</p>
5.1 Central	BCSA12	Greater London Authority (GLA)	<p>Residential development on this site will need to apply the agent of change principle</p>	<p>Noted, the allocation makes reference to the need to address noise, vibration and disturbance associated with adjacent uses.</p>	<p>No change</p>

5.1 Central	BCSA13	Greater London Authority (GLA)	As a 'provide capacity' borough Brent should be seeking opportunities through its site allocations to intensify industrial capacity to satisfy the identified need.	The site is open storage currently and not designated employment land. Given Brent's provide capacity status and the lack of owner interest in pursuing a specific scheme on this site it is considered that the policy could be clearer on seeking a minimum of B1 business space at a plot ratio of 0.65 as part of the redevelopment of the site.	Amend the policy "permission uses" title to: "Allocation Uses" and for this particular site the allocation use to: "Mixed use, with a minimum of 0.65 plot ration B1 business use, with the remainder being of main town centre uses or residential"
5.1 Central	BCSA17	Greater London Authority (GLA)	As a 'provide capacity' borough Brent should be seeking opportunities through its site allocations to intensify industrial capacity to satisfy the identified need.	It has been noted in the comments section of this site allocation that 're-provision of business floorspace at a plot-ratio of 0.65 will be required'. This will represent an increase in commercial floorspace upon current uses. The site is small and as such has limited flexibility in relation to design and layout to accommodate more than 0.65 plot ratio, whilst the allocation seeks to maximise efficeint use of land by encouraging development above any employment uses.	No change
5.1 Central	BCSA17	Sam Dilliway-Davies	Agree with suggested approach re cultural icon and flood risk.	Noted.	No change

5.1 Central	5.1.2	Martin Francis	Clear demarcation between tall buildings and neighbouring suburban homes is required. Guidelines are needed to maintain daylight between tall buildings and should be the same for all occupants, e.g. permanent residents or students.	Tall Building Strategy sets out areas which are and are not appropriate for the development of tall buildings. There is no differentiation in the plan between day lighting standards for students and other residents.	No change
5.1 Central	5.1.3	Martin Francis	Joint work with the local community is needed for the new park to ensure it meets the needs of locals.	Quintain carried out a wider public consultation on Wembley Park masterplan on 12th-16th June, 2015 which included the new public park and landscaping. There may be opportunities related to the detailed design of the northern part of the park for local residents (inside and outside Wembley Park) to get involved.	no change
5.1 Central	5.1.3	Quintain	Park should be described as 7 acres throughout the Local Plan rather than 3 hectares	Agree that the size of the park should be consistent with permission 15/5550 throughout the document.	Change size of park from 3 hectares to 7 acres for consistency throughout the document.
5.1 Central	5.1.5	Martin Francis	The difficulty of east-west bus travel between Wembley Park and Wembley High Road in terms of congestion and event day traffic needs to be addressed.	The Council working with Quintain and TfL is undertaking a 'Western Corridor Study' which will implement improvements to movement flows, with greater prioritisation for non-car modes.	Amend paragraph 5.1.34 to include reference to western corridor study and other relevant transport assessment/ improvements works to ensure improved movement around Wembley.
5.1 Central	5.1.8		Wembley Park Drive part of the town centre is described too positively and	It is recognised that although vacancy levels are low, the quality	Amend paragraph 5.1.8 3rd sentence to: "Overall,

			should be more accurately described as average, uninspiring and low quality in terms of its retail and also eateries/ entertainment venues.	of offer of the centre could be improved to draw more than very local residents or event day visitors, which is something that the town centre manager is seeking to address and will be taken further forward through the development of an action plan. The significant development of Wembley Park will introduce a very large new population and different demographic along with competition from new operators in that development which may encourage change.	however the town centre is considered one of the best performing in terms of occupancy levels of commercial premises."
5.1 Central	5.1.12	Martin Francis	A Green Enterprise Zone could be sited in the Wembley Park area.	It is not entirely clear what the concept of a green enterprise zone is and how it would be funded other than the Council fore-going business rates.	No change
5.1 Central	5.1.17	Philip Grant	Wembley High Road has more relevance to Central place than South West. Strongly oppose designating Wembley Park Drive and Forty Lane as intensification corridors.	The Place boundaries take into account a number of factors but nevertheless it is agreed that they are subjective, rather than definitive, being used a tool to essentially make the local plan more locally relevant to users. Currently Wembley High Road and Wembley Park are two separate town centres which, which if added together would make one very large place, whilst the remaining South West would be too small.	No change

				<p>Notwithstanding the place boundaries, this will not adversely impact on 'joined up' planning as relationships with other places are also considered. The intensification corridors are a product of trying to address the extremely challenging housing targets set for the borough whilst minimising adverse impacts on the environment and character elsewhere Forty Lane and Wembley Park Drive by concentrating development along public transport corridors. Further design guidance is likely to be taken forward to seek to ensure that the quality of the development delivered in the intensification corridors is high. Impacts on heritage assets will be considered through the planning application process.</p>	
5.1 Central	5.1.18	Martin Francis	<p>The council needs to recognise that there is a lack of faith in the community that development will be high quality and well designed.</p>	Noted.	No change
5.1 Central	5.1.18	Greater London Authority (GLA)	<p>Welcome the intention to deliver a minimum of 14,400 homes as part of the Wembley Masterplan, which reflects the numbers set out for the Wembley Opportunity Area. This number of houses should be delivered across the entire OA</p>	<p>The paragraph does not state that the 14,400 will be delivered in the Wembley masterplan area only. It will be a mixture of the masterplan area, other large scale allocations and windfalls, including small sites.</p>	No change

			however, and not just within the Masterplan area.		
5.1 Central	5.1.20	Martin Francis	Refers to Wembley Station car park - presumably this is Wembley Park Station car park	Agree that reference is unclear. Text will be amended to refer to Wembley Park Station.	Change text to read "Wembley Park Station car park"
5.1 Central	5.1.21	Martin Francis	Any development would impact on the new flats between ASDA car park, Chalkhill Community Centre and Bridge Road. Development will need to take account of the green area preserved in the grounds of Ark Academy.	Any development would have to be designed to take account of the existing context within which it sits.	No change
5.1 Central	5.1.22	Quintain	Disagree with wording of this paragraph. While an element of retail is proposed as part of the Fulton Quarter, this will not expand upon the current provision.	Noted. The paragraph takes account of the outputs of the retail and leisure needs assessment and identifies the opportunity that this site could deliver.	No change
5.1 Central	5.1.23	Quintain	Wembley and Wembley Park town centres should be combined into a single town centre. When considered jointly, they meet the tests to be identified as a Metropolitan Town Centre, and this should be raised with the GLA.	This is the longer term aspiration of the Council too. Currently however there is a gap between the centres caused by a lack of continuous active frontage between the LDO and Wembley Triangle and a weak offer between the Triangle and the area to Cecil Avenue which means the centres effectively operate as two different entities. This plan's policies and development proposals should	No change

				overcome this, so that in the coming years the contiguous nature of the wider centre is clear.	
5.1 Central	5.1.29	Quintain	This paragraph should be updated to reflect the fact that Quintain has recently delivered and opened a brand new community hall to replace an existing temporary facility. Object to the statement that the redevelopment of Fountain Studios consolidates the cultural offer. No significant cultural facilities are proposed within the Fulton Quarter masterplan	Changes to the document can be made to reflect additional cultural facilities required. It is considered appropriate to retain reference to the desire to see cultural facilities to be provided on the Fulton Road site.	5.1.33 Yellow pavilion community facility mentioned. Add: 'The provision of Boxpark, Troubadour theatre plus the development of Plot W12 which has permission for further cultural facilities provides the opportunity to further consolidate the cultural offer of the area in the longer term as part of the place making strategy'.
5.1 Central		John Cox	Great Central Way should be upgraded to reduce severance and improved for cyclists and pedestrians. A footbridge over the railway to Tokyngton is needed.	The Western Corridor Study has been produced to guide improvements in Wembley through enhanced bus services and facilities, improvements to pedestrian and cycling infrastructure and securing a substantial travel mode shift away from the private car towards the use of sustainable transport modes. It will deliver connectivity enhancement to support existing and future residential development around Wembley. Particularly the effectiveness of Stadium access	No change

				corridor, Western access corridor, Wembley triangle junction and South Way junction complex. The Brent Cycling Strategy sets out the future priorities for cycling routes in the borough, and includes proposed routes in the vicinity of Great Central Way, to connect Wembley and St Raphael's Estate via Brent River Park. This could be achieved without the need for a cycle/pedestrian bridge across Great Central Way, but potential for a bridge across the railway sidings at Neasden to the north is being explored.	
5.1 Central		Harini Boteju	Building design should incorporate green walls/ roofs to reduce air pollution, improve visual amenity and mitigate climate change. Green infrastructure should be incorporated into design from the beginning and maintained via S106 payments.	Noted, this will be achieved through implementing the London Plan's Urban Greening Factor policy.	No change
5.1 Central		Florent Leblanc	More offices, educational and recreational facilities are needed to support population growth in the Central place.	These are planned as part of permission 15/5550 and further Quintain/ other developments being brought forward.	No change
5.1 Central		John Cox	Pedestrian and cycle links between Wembley Park and Wembley Central should be upgraded.	The pedestrian/ cycleway spine that runs between Wembley Park station and Wembley Triangle will become increasingly more hospitable as an attractive	No change

				environment as the permitted development along it which has active ground floor uses is developed out. Pedestrian crossing improvements as part of the Wembley Triangle development will also assist better movement. Additional development along Wembley High Road with better ground floor presence, e.g. former Ark Elvin and Ujima House will also help improve the over-looking/ safety and animation along the route.	
5.1 Central		Quintain	Indicative capacity needs a range up to 995 and should refer to potential educational uses. Object to a requirement to 'replace' existing retail. The outline application proposes a level of retail which is considered appropriate and viable. Object to the requirement to re-provide the TV studios. There is no sound justification for this. The Fulton Quarter masterplan ensures development does not compromise future schemes that may come forward on the Crescent House site, however Quintain are not in a position to plan both sites 'as one' at this stage.	See change	Capacity amended to 900 dwellings

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.2 East	BP2	Alison Hopkins	2600 new homes are proposed in Staples Corner an area of suburban residential character with super tall buildings. This will be a 60% uplift in Dollis Hill ward homes in about ten percent of its area. Roads are already overcrowded, not even taking account of Brent Cross. The existing social infrastructure is not available to support the new community. The nature of the close knit community will change, particularly if proposals focus on transient rented housing which does not provide truly needed housing for families with young children.	The Council has to look at opportunities to increase housing provision to meet London Plan targets in the longer term. This area will have access to much improved public transport. Suitable transport assessments will be undertaken to limit the potential for adverse impact on the highway network. Necessary on-site social infrastructure will be required through policy, whilst off-site will be supported through CIL. London's populations continually change, more so recently due to increases. A range of dwellings will be provided that meet a wide variety of needs. Over 50% of Brent's population live in rented accommodation currently, as such it is unlikely that this area will be very different to the rest of the borough in terms of tenure.	No change
5.2 East	BP2	Alison Hopkins	Town centres: Cannot work unless massive improvements are made to public safety and the shopping centre	Agreed that more work is required on town centres, which is why priority town centres with	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			itself is attractive to good quality businesses. It has no “draw” and faces significant competition. Brent need to engage properly with local people and businesses, and take SERIOUS action to sort out street drinking and tatty shop fronts. The tri borough Cricklewood Improvement programme and Harrow Town Centre initiatives provide good lessons. Stop focussing on Wembley to the detriment of the rest of Brent. Event Days are a disaster for Neasden.	managers and associated action plans have been instigated. Enforcement action has already commenced to improve the environmental quality of buildings in Neasden town centre with some success, including redecoration and removal of inappropriate signage.	
5.2 East	BP2	Canal & River Trust	Canal and River Trust have been working with the Brent Catchment Partnership on joint projects to reduce pollution and invasive species and on other activities and funding bids for the Welsh Harp. Keen for it to become an attraction to Brent’s population to reap the benefits of being by water.	Noted. Include reference to this within policy BEGA2 and potential for development activity to support this ambition.	Include appropriate reference to this within policy BEGA2 and potential for development activity to support this ambition.
5.2 East	BP2	Eileen Inkson	Have grave concerns about Dudden Hill as an ‘intensification corridor’ and in particular the traffic this proposal would bring. The A4088 is one of the worst for traffic congestion and delayed bus journeys particularly at peak periods in an already densely populated residential area. Air quality is poor, it would be extremely irresponsible to plan to bring	The intensification corridor is provided where there is relatively good public transport. The will allow people to have more choice about their mode of transport, rather than take the private car. It is likely parking will be to reduced standards which will also reduce car use. As such this option is considered less likely to adversely	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			more people into this area without considering the congestion impacts.	impact on congestion compared to the alternative of placing people in areas with poor access to public transport who will therefore definitely use a car and increase the congestion already identified.	
5.2 East	BP2	Francesca Severn	I have several concerns here:a) "enhancement of the Welsh Harp & Silver Jubilee open spaces". A football pitch at Silver Jubilee has recently been provided. Unless ample parking was made available to relieve pressure on residential streets (e.g. Townsend Lane) any further" enhancements" such as sport or playground areas to attract visitors and confine other uses to the margins, or that interferes with the "nature reserve" aspect would not be welcomed.b) High rise estates have proven a problem in the past eg. Chalk Hill) and as such are not supported. Ones or twos of tall buildings close to good public transport connections would be acceptable.c) Cycle lanes on the North Circular and/or A5 will be good for the safety of the cyclists. Needs significant intervention to not increase congestion around Staples corner. d) Infrastructure such as doctors, hospitals, schools MUST be increased to cope with	Noted. The SSSI status of the Welsh Harp means that adequate safeguards have to be in place to ensure it ecological value is not undermined.Tall buildings in themselves are not necessarily the issue, but who lives in them and how they are managed. Management issues in particular in the affordable homes sector are now better addressed than before and new developments are not mono-tenure.Agreed, cycle provision in these areas needs significant intervention.Additional social infrastructure will be provided, however against a backdrop of public sector spending restrictions, it cannot be promised that provision will be sufficient to comfortably meet needs.The consistent provision of wider roads and more parking will encourage travel by private car and therefore	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>the increase in residents which are at capacity.e) Without sweeping improvements to public transport the ideal of reducing car use is very unlikely to happen. As such wider roads and more parking to support local shops would be an advantage</p>	<p>increase congestion. In any case there will not be sufficient public funding available to build such road infrastructure.</p>	
5.2 East	BP2	Mary Duffy	<p>Neasden town centre has a heritage which could be brought out to create a positive character through shopfront improvements and public realm improvements.</p> <p>Changes to Staples Corner are welcomed, though dwellings should be anywhere near the North Circular Road or the Edgware Road as the air quality is poor. The proposed heights of 36 metres is excessive.</p> <p>North West London college at Dollis Hill is a bit of an eyesore. Some housing not higher than 6 floors would be welcomed. The small park at the front of it should be preserved.</p>	<p>Agreed however, there is little of significant merit that allows its identification as a recognised designated or non-designated heritage asset.</p> <p>Concerns about air quality are understood, nevertheless developments will be required to ensure air quality neutral/ positive developments to protect occupiers, which will also address sound related to traffic movements.</p> <p>Dwellings will be taller than 6 storeys due to housing needs and the proximity of Neasden station.</p> <p>The area of green space will be required to be maintained at the very least and ideally improved. Its location however could move to one that ensures it is more beneficial to users and enhances the development.</p>	<p>Identify that the existing designated open space should be enhanced or potentially incorporated into the development in another location if these leads to better townscape/ recreation outcomes as part of the policy.</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.2 East	BP2	Kevin Barry	More excellent education facilities are required Brent needs at least three top class, newly built secondary schools. Neasden high street is scruffy and needs to be regenerated.	Modelling work has been undertaken with colleagues in Education to identify the number of schools which will be needed to inform future population growth. This identified in the medium term an additional secondary school will be needed, and the Chancel House site has been allocated for a secondary school. In the longer-term a sufficient places which equate to a further school will be needed and this is likely to be provided by the expansion of two or more secondary schools. Neasden will have a town centre action plan which will assist in its regeneration.	No change
5.2 East	BP2	TfL Commercial Development	Supportive new housing focus in Neasden Stations Growth Area, and tall buildings. Request amendment of policy wording in Part (c) to make reference to the suitability of tall buildings on sites in town centres and with a high PTAL level. Agree that development should respect local character and context with regard to scale, massing and design, but the limitation on building height of no higher than two storeys above prevailing predominant heights set out in part (d) is	In relation to BP2 it is recognised that c) could be made clearer to incorporate Neasden town centre, which is suitable for the same types of height as identified for the Intensification Corridors. In relation to d) the areas where taller buildings have been identified is considered robust. It is not clear in terms of location where TfL would seek greater flexibility within this particular	For BP2 Criterion c) add Neasden Town Centre.

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			<p>unnecessarily restrictive for development in locations where “designated heritage assets will not be adversely impacted”. Request more flexibility is employed to determine development heights, which should be considered on a case by case basis.</p> <p>TfL CD is generally supportive of Policy BP2 East, Homes, and the locations set out for potential development, such as Neasden town centre and Neasden Stations Growth Area. The policy and justification should be amended to include reference to edge of town centre locations along with town centres and intensification corridors as areas providing opportunities for new residential development.</p>	<p>Place.</p> <p>This is agreed however would in any case be allowed through general policies, e.g. London Plan small sites policy, Brent Policy BD1, etc.</p>	
5.2 East	BP2	Alison Hopkins	<p>Proposal is predicated on the opening of the Brent Cross West station, funding for which is uncertain, to say the least. The map of Staples Corner Industrial Area is inaccurate and includes residential roads as well as lorry ban areas. As buildings are 99% occupied where is the capacity for more space? There is no detail on the nature of employment or the businesses occupiers. It is not clear where demand will come from. Vague reference to “warehousing” is hardly</p>	<p>The Brent Cross West station now has funding agreed. The map includes the policy area. The detail of the provision of the industrial floorspace will come through the masterplanning process. The London Plan identifies storage and distribution uses as the key driver for business space requirements. Other industrial uses consistent with Brent's aim to increase skills and</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			ambitious employment such as tech hubs? There is no business case, supported by real private sector engagement?	incomes of residents will be sought too. There is much private sector investment interest in the area, particularly though mixed use development.	
5.2 East	BP2	Quintain	Strongly support inclusion of the Neasden Stations Growth area as a focus for housing and employment to be provided in tall buildings as set out within the vision. The following comments are made in respect of parts (a) to (w) of the policy:Part b – object to the limit of 36m/12 storeys which is too conservative and prescriptive in these locations based on current evidence. Greater flexibility required on height where demonstrated acceptable in terms of townscape and visual impact. The Growth Area has very limited heritage or townscape constraints and is a highly sustainable and accessible site (currently PTAL 4) to be enhanced with the West London Orbital Link. The Plan should maximise site densities in this location.Part p – whilst we strongly support this part of the policy, as noted above, we object to part b of this policy as well as Policy BD1 as we consider that these will restrict the redevelopment of the College of North West London sites as currently identified	Noted.The Council has taken account of the Tall Buildings strategy as well as comments/ information supplied in response to consultation. At this stage it does not consider that this location is appropriate for very tall buildings and is content with the heights in this location identified on the policies map.The Council will consider this element, but has to also consider the appropriateness of the height of buildings, particularly those well in excess of 10 storeys.	The policy has been amended to not place a maximum height on development prior to its more detailed consideration at the masterplanning stage or when more detailed townscape / views analysis is undertaken.

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			in the Local plan and will limit the ability to achieve the aims defined by this part of the policy. Please refer to Appendix 1 for proposed text changes.		
5.2 East	BP2	Amafhh Investments Ltd	The principle of Preferred Policy Option BP2 East is supported as is the decision to identify the Staples Corner SIL as a Growth Area. Policy BP2 (and its supporting text) should be amended to increase the restricted height at the Staples Corner Growth Area (due to the adjacency of approved BXC cluster of tall buildings of up to 100 metres and Brent Cross West railway station which will increase PTAL) which will change the character of the area. The inclusion of policy support for the development of hotel and banqueting/conference facilities as complementary uses supporting the encouraged growth of businesses in the Staples Corner Growth Area.	Consideration will be given to the appropriate heights taking into account the emerging context identified within Barnet. At this stage the focus will be on ensuring maximising employment and residential space with associated social infrastructure. Other uses may be appropriate, although the scale of these will not be at the expense of the priority uses identified. This will be further addressed in the masterplanning exercises.	Consider as part of the masterplanning exercise.
5.2 East	BP2	Eileen Inkson	No table of Challenges and Opportunities is listed for the East section, this feels like it was missed. Overall – the layout of the full document incredibly confusing and difficult to follow. The multiple sections all titled the same thing were illogical. Much of the language was incredibly off-putting (intensification corridors!).	Unfortunately during the printing process the challenges and opportunities although written were lost in the desktop publishing process. Where possible content and language will be simplified. The transportation matters cannot be addressed alone through the	Add challenges and opportunities for East place. Simplify language/ content of the Plan where possible.

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			<p>More detail and emphasis on transport issues is required on how to encourage more cycling and walking in an area that is very heavily congested and polluted with vehicle emissions.</p> <p>The reinvigoration of Neasden Town centre is all quite vague as to how it would be achieved.</p>	<p>Local Plan and the Local Transport Plan provides a more detailed list of projects that is updated on a more regular basis to support funding bids.</p> <p>The Neasden Town centre policies have yet to benefit from the finalisation of the town centre action plan. This will provide more clarity on the non-planning elements which are an integral part of ensuring success.</p>	
5.2 East	BP2		<p>Retailers need to take more responsibility for the litter and rubbish that will be caused. Litter is a significant problem in the underpass to Birse Crescent and there needs to be better enforcement of businesses and residents. Neasden town centre does not need any more take away or betting shop retailers - it is already identified as being in the top ten of the most unhealthy town centres in London.</p>	<p>The Council seeks to ensure that retailers follow their duties in relation to waste management and where they do not will take enforcement action. Policies should limit the amount of takeaways or betting shops.</p>	No change
5.2 East	BP2	John Cox	<p>Add to Policy BP2: "Safeguard land for all reasonably feasible future rail services this century, including enhancing the connection between the Dudding Hill Line and the Chiltern Main Line/Chiltern Railways Aylesbury Branch at 'Neasden Stations'." There are TWO (probably</p>	<p>The National Planning Policy Framework paragraph 104 c) sets out the parameters in which sites and routes identified as critical to developing infrastructure to widen transport choice should be based on; this includes robust evidence.</p>	No change

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			<p>contradictory) possibilities that the 'Neasden Stations' studies must consider:- Firstly, since the Dudding Hill Line is already higher than the Chiltern and Underground lines, a small-radius flyover (possibly single track) from the Dudding Hill Line seems just possible, over two Chiltern Main Line tracks slewed a little to the south, maybe needing a slice of land from the scrap yard. The flyover would then reach newly-separated Aylesbury branch tracks (or at least one of them) and still squeeze under the North Circular Road. That would avoid crossing the Chiltern Main Line at grade, reducing line capacity into Marylebone station.- Secondly. there are already-existing, hardly-noticed bridge abutments on the Dudding Hill Line, to allow trains to be run between Gladstone Park and the branches of Chiltern Railways - but that chord was never built during WW2 on a new bridge over Neasden Lane.The studies must acknowledge those possibilities and include the public rather than just discredited Network Rail and its fellow 'stakeholders' in deciding either to retain them for the future, or to allow development to permanently rule them out.</p>	<p>Policy also used to state that there would be a reasonable prospect on the project being delivered in the lifetime of the Plan was also required. Whilst it might be desirable to consider these options to consider access for services to the Chiltern Line, the work on these is not advanced and therefore is very speculative. As such a Local Plan policy would be inappropriate, particularly if referencing safeguarding of land. It might be possible for the connections to be considered as the WLO moves forward. At this stage however the emphasis is very much on supporting the business case for the minimum amount of infrastructure required to support a passenger service on the WLO route.</p>	

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5.2 East	BEGA1-2	John Cox	<p>Sufficient intensification of the Wembley SIL ought to be able to allow de-designating some Staples Corner and 'Neasden Stations' growth areas SIL. Strongly support development of the two growth areas, on the general terms that you suggest. Both need added green space. The 'Neasden Stations' area in particular should focus on no-car development throughout.</p>	<p>As a 'provide capacity' borough, Brent has to provide an additional 43ha of industrial floorspace by the end of the plan period. In addition to this the council has to deliver a significant number of new homes. In order to do this the most effective method identified is to increase the provision of both residential and industrial through the development of co-location sites. The Council will seek to ensure land is used more effectively whilst maintaining or ideally increasing industrial/ employment space provision. The site allocation includes reference to the need for both green infrastructure and open space. The WLO is likely to increase PTAL levels by 1. Some of the would still remain below PTAL 4, however given its proximity to both Neasden and Dollis Hill stations and the bus links along Neasden Lane and Dudden Hill Road, subject to existing residents amenity not being significantly prejudiced a car free scheme is</p>	<p>No change. Other Local Plan policies deal with when car free developments will be supported.</p>

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				likely to be looked upon favourably.	
5.2 East	BEGA1	United College Group	Support the policy approach to the redevelopment of the site to allow re-provision of the College buildings elsewhere in the borough but has concerns that the redevelopment of the Willesden campus could be delayed as a result of a requirement to undertake a masterplanning exercise. Whilst a masterplan approach may be suitable for the existing employment allocations, given the number of different ownerships and the need to assemble these into a viable redevelopment/regeneration scheme, it is not considered a necessary approach with regard to the UCG land. This will result in unnecessary delay that will preclude the development of much needed affordable and market housing. An independent allocation of the Willesden Campus will enable the delivery of extensive public benefits earlier within the plan period. Early redevelopment is fundamental to UCG's estate strategy and will facilitate the delivery of opportunities identified elsewhere within the borough; which might not otherwise come forward if proposals for the Willesden Campus are	Splitting the site up at this stage is not considered appropriate as the Council wishes to see a comprehensive plan for its redevelopment. The Council understands the need for the CNWL site to progress and its role in supporting the college's wider plans which the Council is very supportive of in principle. Should it have to, in advance of a masterplan being adopted the Council will balance the potential need to make a decision related to a planning application on this site up against a wider understanding of its contribution to a successful Neasden Growth Area and the benefits for Wembley and educational provision within the borough. It is recognised that in relation to energy, the parameters can change quickly. Should the developer of the CNWL site not consider it feasible to be part of a district heating network, then this should be set out in the energy statement supporting any	No change

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			delayed through a land assembly process	application, consistent with the London Plan's policies on this matter.	
5.2 East	BEGA1	Sport England	If the College of North West London site has any sports facilities these would need to be retained or replaced for this allocation to comply with the NPPF, paragraph 97. This should be stated in the allocation.	The CNWL site does have a Multi-Use Games Area. This however is not open to the public and is not identified in the borough sports facilities audit. The Council will seek to ensure that if possible a similar facility is provided on the new consolidated campus building in Wembley. Given the quantum of development in the Neasden Growth Area, ideally a similar facility will be provided. This site would appear to provide the most flexibility to allow that provision to occur.	Reference provision of sports facilities in Policy BEGA1 for this site which Sport England has identified will either need to be retained or replaced.
5.2 East	BEGA1	Aggregate Industries	BEGA1 has implications for the potential loss of the rail depot and associated infrastructure. Following amendments suggested (in reference to para 224, section e of the NPPF): 1. Preferred Policy Option: BP2 East – that the section on transport refers to the rail depot and the need for it to be safeguarded;2. Allocation BEGA1 – that the section on Planning Considerations refers to the presence of the rail depot and the need to reflect the approach	Noted. This site is outside the Growth Area policy area, separated from it by a railway. In line with the London Plan and NPPF 'agent of change' principle/policies, it will have to be considered as part of any planning application.	Make the growth area policy clearer that existing adjacent uses and their reasonable activities should not be compromised by new development consistent with the 'agent of change' principle.

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			outlined in paragraph 182 of the NPPF outlined above; and3. The plan accompanying BEGA1 identifies the rail depot as a safeguarded facility.		
5.2 East	BEGA1	TfL Commercial Development	Allocation of Neasden Station Car Park as part of BEGA1 is welcomed. It has no current industrial designations and as a result we request that the site should come forward for residential development of approximately 70 dwellings. Existing industrial locations within Site Allocation BEGA1 are deemed to be more suited to accommodate industrial development and growth, given their current uses and industrial designations.	Noted. The Neasden Growth Area will be subject to a masterplan approach and therefore reference to individual site elements capacity will not be made. Due to Brent's status as a 'provide capacity' borough, all options for provision of additional employment space have to be considered. Consistent with emerging London Plan policies the masterplan will seek a net increase in employment floorspace across the site, which may result in the station car park contributing towards this.	Provide further clarity in the policy that a minimum amount of employment floorspace consistent with plot ratio of 0.65 of the existing designated employment land will apply to the whole area, with the opportunity to increase that if possible. Whilst existing industrial sites are likely to be the priority locations, its wider provision within other sites will also be welcomed where this leads to improved outcomes overall.
5.2 East	BEGA1	Greater London Authority (GLA)	The site furthest to the west is designated Strategic Industrial Land (SIL). In new policies in the London Plan co-location is not considered acceptable on designated SIL.	Noted. The Council understands the need to protect London's industrial capacity and as such is keen to work with the GLA to maximise the potential of this area for its industrial use, whilst recognising that this might be better attained through supporting	Provide further clarity in the policy that a minimum amount of employment floorspace consistent with plot ratio of 0.65 of the existing designated employment land will apply to the whole area,

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				<p>enabling development of non-industrial uses. This part of SIL has no physical connection with the wider SIL to the north of the railway line. As such on the ground it has the same characteristics as the adjacent LSIS and as such the Council wishes to see it developed in a complementary manner that creates a better place, which includes much better employment space than currently exists.</p>	<p>with the opportunity to increase that if possible. Whilst existing industrial sites are likely to be the priority locations, its wider provision within other sites will also be welcomed where this leads to improved outcomes overall.</p>
5.2 East	BEGA1	Universities Superannuation Scheme (USS)	<p>The Policy BEGA1 allocation is supported and in particular its focus on maintaining and potentially increasing employment floorspace and the key design principle of ensuring a successful co-location/ intensification to allow the area to prosper as an employment location. The current wording of the policy is, however, restrictive for redevelopment of the area, particularly to nonindustrial/ residential uses until a masterplan has been completed and adopted by the Council. This will take time. USS requests the allocation also supports flexibility between existing uses to ensure that employment units can adapt to different market demands should this</p>	<p>The policy takes a restrictive approach due to the need to be in general conformity with the London Plan which identifies the area as Strategic Industrial Land. As such the masterplan is required to allow GLA to take a more positive approach to allowing non-industrial uses within this area, which otherwise consistent with London Plan policy will not be appropriate. Where the masterplan identifies industrial use locations, greater flexibility for loss of industrial floorspace that has to be provided will not be allowed. The Council will seek to work with</p>	No change

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			change in the foreseeable future and are not a risk of becoming vacant.USS is keen to ensure that redevelopment of the Site will not preclude the existing employment use and will need to work carefully with the Council at the masterplanning stage.	landowners/ developers at the Masterplan stage.	
5.2 East	BEGA1	Thames Water	The water network capacity, including the wastewater network, will require strategic upgrades to support increased demand, with developers encouraged to work with Thames Water from the early planning stages. Surface water should be attenuated on site to greenfield run-off rates.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Local upgrades to the existing water network

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					<p>infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p>
5.2 East	BEGA1	Quintain	<p>The allocation covers a very wide area and very diverse sites. It should be split into separate allocations to give more confidence and clarity on delivery, uses and density. Concerned about the potential delay of requiring a masterplan in place. Any masterplan must involve all stakeholders from the start of the process - setting of parameters and principles. It should not be overly prescriptive; planning application stage should address the detail. Provision of a Decentralised Energy Centre (DEC) will</p>	<p>Splitting the site up at this stage is not considered appropriate as the Council wishes to see a comprehensive plan for its redevelopment. The Council understands the need for the CNWL site to progress and its role in supporting the college's wider plans which the Council is very supportive of in principle. Should it have to, in advance of a masterplan being adopted the Council will balance the potential</p>	No change

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			be difficult to deliver with only 2000 residential units particularly given the uncertainty over the phasing of sites coming forward. Early work should be undertaken as part of the Masterplanning exercise on this requirement to demonstrate if it is viable and if not, feasible alternatives should be put forward. Please refer to Appendix 1 for proposed text changes.	need to make a decision related to a planning application on this site up against a wider understanding of its contribution to a successful Neasden Growth Area and the benefits for Wembley and educational provision within the borough. It is recognised that in relation to energy, the parameters can change quickly. Should the developer of the CNWL site not consider it feasible to be part of a district heating network, then this should be set out in the energy statement supporting any application, consistent with the London Plan's policies on this matter.	
5.2 East	BEGA1	HGH Consulting (on behalf of unnamed clients)	Support allocation BEGA1. However, encourage that best use is made from the opportunities arising from this transport hub. To this end, we agree it is important that the Council promotes the West London Orbital Station at Neasden and facilitates its development in order to make the best use of the area.	Noted. The Council is supporting as best it can the case for the implementation of the West London Orbital, and its stations at Neasden and Harlesden.	No change
5.2 East	BEGA2	London Borough of Barnet	Barnet is working to bring forward the new Brent Cross West Station which will improve local public transport accessibility and provide a new	Welcome closer dialogue. Policy can be amended to identify Brent Cross West is in LB Barnet.	Amend policy wording where appropriate to identify Brent Cross West as being within LB Barnet.

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			pedestrian route across the railway lines. This investment has the potential to benefit Brent, and further discussions on how the Boroughs can jointly support transport and connectivity improvements will be supported. Brent Cross West Station should be acknowledged as being within LB Barnet.		
5.2 East	BEGA2	Natural England	Pleas protection and enhancement of Brent Reservoir SSSI has been considered within the preferred options and draft policies. The SSSI should be considered throughout all stages of the formation of the local plan. We would advise that you consider the impact of tall buildings on the flight paths of the breeding wetland birds that use Brent Reservoir SSSI.	Noted. This will be now highlighted in the policy.	Amend the policy to make reference to the need to consider the impact of tall buildings on the flight paths and behaviours of breeding wetland birds.
5.2 East	BEGA2	Mary Duffy	Staples Corner could become more residential, but 10+ floors are excessive 3-6 floors is plenty enough. This is North West London, not Manhattan. What is forgotten in this race to build high rises is that they were only necessary in Manhattan as land is very limited there as it is an Island. London is not an Island and neither will it be such a haven for property speculators if we have a no Deal Brexit	Noted, however the need to find additional homes is pressing in the longer term too. This area will have increased access to high quality public transport which makes it appropriate for higher density development.	No change

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5.2 East	BEGA2	Greater London Authority (GLA)	Staples Corner is designated SIL and as such Draft New London Plan policies E4, E5 and E7 apply and Brent should be seeking to intensify and enhance the industrial, storage and distribution functions of Staples Corner. The introduction of non-industrial uses would only be considered acceptable through a process of consolidation and intensification of industrial uses, leading to a release of some designated SIL. However, any proposed release of SIL would also need to factor in, that Brent is identified in the Draft New London Plan as a 'provide capacity' borough' with a requirement to provide in the region of 43ha more industrial land up to 2041 (London Industrial Land Demand 2017 (CAG Consultants).	Noted. Proposed residential units are to come forward through a masterplan approach which aims to increase and enhance the provision of industrial floorspace. The GLA is actively involved in the masterplanning exercise and will heavily influence the final solutions that are considered appropriate for the area.	No change
5.2 East	BEGA2	Hashim Nawrozzadeh	Staples Corner Growth Area is welcomed to promote it's much needed regeneration. Support Masterplan preparation. This will need active engagement with landowners to ensure it is robust accommodating the right mix of uses, with ground floor employment and above as residential. Given the restrictions related to a masterplan being in place, a timetable must be agreed. Coles Green Road is an example where	Noted. The timescale for delivery of additional homes is identified towards the second half of the Plan period. Given the SIL designation the GLA will need to be assured that the masterplan is consistent with London Plan policy aims. Masterplanning will be undertaken in a timely manner and a timetable set out in due course.	No change

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			there are already a number of blocks of residential flats.		
5.2 East	BEGA2	Thames Water	The water network capacity, including the wastewater network, will require strategic upgrades to support increased demand, with developers encouraged to work with Thames Water from the early planning stages. Surface water should be attenuated on site to greenfield run-off rates.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating

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					identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.
5.2 East	BEGA2	Canal & River Trust	<p>Note redevelopment of the Strategic Industrial Land will be master planned with no redevelopment it has been published. As the owner of the Brent Reservoir, we look forward to working with the Council to identify appropriate waterside uses and opportunities to improve environmental quality in this area.</p> <p>Note that Appendix A of the Level 2 Flood Risk Assessment does not indicate whether or not sites are at risk of reservoir flooding.</p>	The desire of the Trust to be involved is welcomed. The area sits well above the reservoir and is therefore not at risk of flooding due to a breach/ failure of the defences.	No change

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5.2 East	BEGA2	Amafh Investments Ltd	Support the principle of the Site Allocation of Staples Corner Growth Area as a whole, however, we consider the suggested prohibition of redevelopment before the completion of the masterplan (as referred to under the 'Planning Considerations' section) to be: inappropriate (due to its conflict with Paras 49 and 50 of the NPPF); and potentially damaging to the prospects of redevelopment occurring in the Growth Area (particularly in time for the completion of the new Thameslink Railway Station). Recommend that the more flexible approach taken in Para 5.2.18 should be introduced into the BEGA2 text, to allow for a judgement of each application on its merits. The draft Local Plan should also be amended to include a timescale for when the masterplan work will be completed.	Noted. The site allocation includes the following text: 'Until a master plan has been completed/ adopted by the Council, no redevelopments, particularly to non-industrial/ residential will be permitted in the area.' Paragraph 5.2.18 will apply to this site allocation and does not require direct inclusion within the text.	No change
5.2 East	BEGA2	Marcelino Padilla, Gurbachan Daheley, Dom O'Keefe, Lucas Hryniewicz, Jennifer Elmes, Roger Anthony, Zahra F, Ashfaq	1. Coles Green Rd and Waterloo Rd is a residential area and NOT now the right location for industrial units, and especially not a paint factory which has been subject to two fires in 2004 and 2018. Fortunate there were no fatalities.2 Inefficient use of Staples Corner land in particular has meant Brent is falling hugely behind other Boroughs in	1. Noted. The allocation only includes areas occupied by commercial uses, with the exception of a few residential homes on Waterloo Road. The development proposed will be through co-location, and therefore include uses which are generally light industrial and do not impact	No change

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		Hussain, Hyder Mohsin	fulfilling housing requirements and regeneration. For example on Coles Green Road.3. Restrictive planning policies will only lead to a continued decline in investment in the area 4. Planners must engage with landowners and residents and must agree a timetable for delivery of this Masterplan otherwise it will just lead to further stagnation5. The Masterplan must reflect the economics of delivery by creating value and this will require an acceptable mix of uses including significant levels of residential development. This can be provided above existing or redeveloped employment uses at street level.	neighbouring receptors. Those heavier industrial uses will be heavier will be placed away from residential areas. The proposed developments will be sympathetic to surrounding residents. The site allocation will be subject to a masterplan approach which will itself go through public consultation. 2. Noted. Redevelopment of this site will bring forward large scale regeneration to the area with the inclusion of both residential units and jobs through increased employment floorspace. 3. The policies proposed within the Local Plan set a framework for how development should come forward within the borough. Brent is pro-development that is positive for the borough and is promoting the development of the Staples Corner site through co-location. 4. Noted. A masterplanning process will commence with the support of the GLA. Where industrial development that intensifies use within SIL is proposed in advance of the masterplan, unless it is considered to be likely to be	

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				extremely prejudicial to the outcome of the masterplan process, it is likely to be received positively. 5. Noted. The site will be subject to a masterplan approach which will outline the appropriate mix of uses and their arrangement within the site.	
5.2 East	BESA1	Aitch Group	Support allocation, the following amendments are suggested:i. Timeframe for delivery – my client’s application is for 42 no. new homes (including 35% affordable housing provision). Subject to securing a timely permission, this capacity will be delivered in the 0-5 year timeframe, alongside the proposed 726.5sqm (GIA) of B-use floorspace, andii. Design Principles – should not unduly restrict proposed storey heights, a design-led approach should be used and 6-8 storeys is likely to be acceptable on the Neasden Lane frontage. It has been demonstrated that up to 6 storeys is acceptable on Coombe Road at the northern part of the proposed draft site allocation.	Noted. The policy can be amended to take account of expected delivery timescales of this part of the site. The heights proposed are considered appropriate in the policy. Proposals for additional height along the Blackbird Hill frontage can be considered on their merits. Nevertheless, without a fuller analysis it is not considered appropriate to make such amendments to policy, particularly given the close proximity of the Neasden conservation area.	Amend policy to take account of early delivery of part of the site.
5.2 East	BESA1	Environment Agency	No mention that it is only 300m downstream of the Brent Reservoir dam with its associated risks. Rapid onset of flooding could occur and residential	It is accepted that there is a very small residual risk associated with its location downstream of the reservoir related to a potential	Amend policy to include reference to potential risk of rapid inundation from the reservoir which will

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			development might not be appropriate so this needs to be referred to. This should be shown in the reservoir flood maps. A site specific sequential approach should be sought.	breach/ rapid inundation of flood waters. This should be identified in the policy. The policy seeks a sequential approach to the location of uses.	need to be considered as part of any site specific flood risk assessment.
5.2 East	BESA1	Thames Water	The water network capacity, including the wastewater network, will require strategic upgrades to support increased demand, with developers encouraged to work with Thames Water from the early planning stages. Surface water should be attenuated on site to greenfield run-off rates.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Local upgrades to the existing water network infrastructure may be required to ensure

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					essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.2 East	BESA1	Greater London Authority (GLA)	These sites include non-designated industrial land of strategic importance, making a significant contribution to the functioning of London. In accordance with Draft New London Plan Policy E4, and as a 'provide capacity' borough, the proposed release of any industrial land is only be considered acceptable where it forms part of a borough-wide strategy underpinned by industrial floorspace capacity evidence demonstrating a net increase for the whole borough of approximately 43ha more of industrial land up to 2041. (same comment applies to policies BESA1, BSSA5, BSSA6, BSSA8, BSESA18, BSESA22, BSWSA4, BSWSA5, BSWSA6, BSWSA15)	Noted. The Council does not consider the GLA provide capacity figure as reasonable or achievable. Nevertheless, it will seek to maximise the provision of industrial floorspace supported by mixed use development, as such it will amend the policy to require this for this site.	Amend the policy to state. "Provision of industrial floorspace as part of a mixed use development should be maximised through a design led approach and viability testing. At the very least a replacement of the existing floorspace on individual sites that come forward, or a plot ratio of 0.65 whichever is the greatest will be required."
5.2 East	BESA1	Canal & River Trust	Welcome setback from the waterway being secured through s106 in this location. Important to ensure that development does not have an adverse impact whilst maximising opportunities for ecological enhancement. Appendix A of the Level 2 Flood Risk	Noted. See below in response to the Environment Agency. Reservoir flooding potential will be highlighted in the policy.	Amend policy to identify the risk of reservoir flooding as set out in the response to the Environment Agency.

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			Assessment does not indicate whether or not sites are at risk of reservoir flooding.		
5.2 East	BESA2	Maree Shaw	It is essential to retain a bus depot.	The policy seeks to ensure re-provision of the existing bus depot.	No change
5.2 East	BESA2	Thames Water	The water network capacity, including the wastewater network, will require strategic upgrades to support increased demand, with developers encouraged to work with Thames Water from the early planning stages. Surface water should be attenuated on site to greenfield run-off rates.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is

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					delivered prior to the development creating identified additional capacity requirements.
5.2 East	BESA3	Sport England	The Multi-Use Games Area (MUGA) on site should be retained (and improved) or replaced in the locality to ensure this allocation is in accordance with the NPPF.	This was a playground never open to the public and was part of the previous private nursery/ school playground. It has not been identified within any evidence base document as capacity that is meeting a wider community need. The policy is clear replacement D1 uses will be required, although this is likely to be in the form of a building. Improvements to play/ open space in the area if required can be achieved through CIL contributions attained from this development.	No change
5.2 East	5.2.6	Quintain	Paragraph should be amended to recognise Dollis Hill Station is immediately adjacent to the East Place boundary with a significant beneficial impact on the PTAL rating for this part of the East Place.	Agreed, although in the context of the Place as a whole, this impact is limited.	Amend paragraph 5.2.6. Add 2nd sentence. "In addition Dollis Hill underground improves public transport accessibility to the south east part of the East Place."
5.2 East	5.2.14	Quintain	Support Growth Areas being recognised as suitable locations for radical change, this aspiration will be restricted by the	The Council considers the 12 storeys as an appropriate starting point on the basis of its analysis as	No change

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			imposition of an arbitrary/prescriptive 12 storey height limit set by Policy BP2 East.	set out in the supporting Tall Buildings Strategy.	
5.2 East	5.2.16	Quintain	Any masterplan exercise must involve stakeholders, land owners and developers from the very start.	Noted. This is good practice, taking forward such a masterplan without landowner/ developer support is likely to be counter-productive.	No change
5.2 East	5.2.18	Quintain	Timetable for SPD adoption will need to progress very soon and not delay development proposals provided they clearly and robustly demonstrate fitting into the emerging masterplan.	Noted. The paragraph indicates that it might be possible for development to progress prior to completion of a masterplan.	No change
5.2 East	5.2.22	Quintain	Delivery of Growth Area community facilities is fully recognised. The requirement for any development to deliver these will need to be reflected in the Council's CIL 123 List and where necessary be treated as payment in kind.	Noted.	No change
5.2 East	5.2.26	Quintain	We strongly support the aspirations to ensure the College of North West London ("CNWL") has the facilities to ensure it remains an important educational asset for the residents of Brent and further afield. Restricting the redevelopment as currently proposed within policies BP2 East and BD1 will restrain achievement of these aims and delivering the facilities required by CNWL.	The Council will consider Quintain's representations and do the best that it can from a planning policy perspective to support CNWL's relocation plans. Nevertheless, it has to consider the overall success of Neasden Growth Area and what the college site should reasonably be expected to deliver to support a balanced and mixed community	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				with associated supporting uses and social infrastructure. Neasden is not Wembley Park and as such expectations on the heights of buildings that can be achieved/ supported in this area should take account of existing character and guidance provided in the Tall Buildings Strategy/ heights on the policies maps.	
5.2 East		Mary Duffy	10+ storeys are excessive. Entire Neasden/ Blackbird Hill/ Dollis Hill area is predominantly 2 storeys. Anything more than 3-6 storeys would be excessive and making Blackbird Hill an "Intensification Corridor" is detrimental to the character of the area. Air quality along the A4088 is poor and potentially dangerous to the health of anyone living in an apartment along this road. Air quality impact assessments are not submitted with any of these planning applications.	Noted. As identified, the public transport accessibility of Neasden Growth Area make it more suitable for more intensive development than elsewhere in Neasden. The identification of intensification corridors is part of the strategy of concentrating new development in locations reasonably accessible to public transport. This will reduce the development pressure elsewhere, thus overall ensuring that more of Brent's character is retained. Air quality is a concern across most of the borough. New major developments have to be air quality positive or neutral. This usually includes provision of filters for air circulated within buildings.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.2 East		Mary Duffy	Neasden Town centre is not a safe place to live. Air quality is appalling because of the proximity to the North Circular Road and the A4088. It is noisy because of the buses, cars and street drinkers. There is little to no police presence due to cutbacks.	There are challenges for Neasden, some of which the Local Plan can assist in addressing, others less so.	No change
5.2 East		Mary Duffy	The Welsh Harp recreational offer of many sailing clubs should not be interfered with. Tall buildings (4-10 storey buildings) around Neasden Underground Station should not be built. The majority of the existing houses are no more than 2 storeys high. Parts of the Brent Tall Buildings Strategy are inconsistent for Neasden. Page 31 and 33 give different acceptable heights. West London Orbital Route supported - it is low noise and low pollution way make Neasden more accessible and desirable, bring more custom to Neasden town centre but also Brent Cross shopping centre currently only accessible by either bus or car.	Noted. The policy is not advocating interference with the sailing club. The proximity of the area to Neasden station, plus the proposed WLO station means that opportunities to optimise efficient use of land should occur. This will mean the introduction of tall buildings due to the need to increase housing delivery but also the relatively limited environmental constraints. The inconsistency in the heights in the Strategy will be rectified. Support for the WLO is welcomed.	Amend Tall Buildings Strategy to address inconsistencies of height for Neasden Growth Area.
5.2 East		Alison Hopkins	Staples Corner: Where will it be "acceptable" to cram in very tall buildings, given that the A5 corridor ought to be no more than 5 or 6 storeys and that slope down ought to happen? The area is small	The Tall Buildings Strategy identifies that Staples Corner is acceptable for buildings taller than those identified for the intensification corridors. A	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			with factors such as the Grade II* listed Oxgate Farm to consider, how can it be acceptable to cram in 2600 “homes” in tower blocks and due to private land ownership is it deliverable? Tower blocks not required, good quality family housing with open space is.	masterplanning exercise that takes into account a more detailed analysis of the site and its surroundings will provide clarity on appropriate building heights. This will include assessment of impacts on heritage assets such as Oxgate Farm. The delivery element will also be assessed as part of the masterplanning. Whilst land ownership might make things more challenging in terms of co-ordination of delivery, the positive investment framework is likely to encourage most site owners/ developers to want to engage in the proposed change of the area.	
5.2 East		Eileen Inkson	Disagree entirely in relation to Neasden Town Centre with ‘There is very limited need for additional retail and leisure/ drinking in the area in the future.’ The whole area is in dire need of better shops and some cafes/restaurants or pubs to reflect change with a large flux of young families and young professionals who currently go to Willesden Green or catch the tube to Hampstead or Kilburn. Disappointed no specific measures are set out on how this will be achieved.	The need for change in quality of offer is not disputed. It is the capacity for additional floorspace that is limited taking account of adjacent competing centres and changes in the way people spend, e.g. on-line. A town centre action plan will be developed by the town centre managers which seeks to improve the quality of the offer of the centre.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.2 East		Alison Hopkins	Intensifying Staples Corner in the (very vaguely) proposed manner is wholly unacceptable. Land safe guarded for the WLO is not specified, nor how this will be achieved.	The intensification of Staples Corner will be subject to masterplanning, which will allow further engagement. The current WLO operational rail land is essentially the land that will be safeguarded. Where proposals for off-line infrastructure become clearer, e.g. station extents, then these will be identified in any update of the Plan.	No change
5.2 East		Robert Donovan	Neasden shopping centre has unwanted vagrants and drinkers and is now an intimidating and dangerous place, especially at night.	Noted. The town centre manager is working with the businesses and enforcement agencies to ensure that anti-social behaviour is reduced and perceptions of safety are enhanced.	No change
5.2 East		Mary Duffy	Social infrastructure: Brent has been closing libraries and is unlikely to start opening them again. The GP Surgery on Braemar Avenue is now closed. A Neasden Police Station would be nice, the Chalk Hill one is always closed.	It is agreed that the Council is unlikely to open new libraries, although there is nothing to stop local communities doing so. Decisions on provision of GP Practices are made by the Brent CCG. Where advised by the Police the Council can seek to negotiate provision of additional police facilities, these however are unlikely to be stations and a more often than not small facilities.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.2 East		Teresa Krajewska	<p>Impacts on infrastructure needs to be better assessed.</p> <p>Noise and air pollution of skip and building lorries using our residential roads will only get worse with all the proposed neighbouring development.</p> <p>Specific mention of the Edwardian Dollis Hill Estate is needed given numerous reference to cultural heritage value of housing in other areas.</p> <p>Areas such as Chapter Road are described in disparaging terms, there is no recognition that with council intervention and action against irresponsible landlords these might have been improved.</p> <p>Presumably, the line : 'Tall buildings would not be in keeping with the character of the majority of this place' is not intended to apply to our areas here?</p> <p>WLO means that houses close to the line will get all the downsides of noise and pollution and none of the benefits.</p> <p>'Safeguard land for the West London Orbital route' is another way of saying compulsory purchase. Will this affect land park and significantly, the protected Gladstone Park allotments land?</p> <p>The various proposals will be very costly with a risk that overspend will result in</p>	<p>Greater clarity will be set out in high level infrastructure requirements in the Infrastructure Delivery Plan.</p> <p>Noted. Larger developments will be subject to construction management plans which seek to limit these adverse effects.</p> <p>Dollis Hill Estate is identified as a potential conservation area in the Heritage Strategy.</p> <p>Chapter Road is not described in disparaging terms.</p> <p>The preferred areas for tall buildings are identified in the overview and also site specific/ corridor policies.</p> <p>WLO, some people may be adversely affected with the proposed passenger service, many more will benefit.</p> <p>The Council seeks to prioritise genuinely affordable homes, however private sector investment is often necessary to support the delivery of market homes which subsidise affordable homes.</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>environmental benefits sacrificed with new private landlords will be the main beneficiaries. The council needs to show evidence-based safeguards.</p> <p>Proper affordable family homes where people have security is needed, not more investment overseas and wealthy Brits investors properties to rent out, exploiting those with a housing need.</p> <p>Brexit impacts are not taken into account.</p>		
5.2 East		John Cox	<p>The environment around the North Circular Road/ Neasden town centre including backs of buildings is horrible. Neasden Lane stub and Birse Crescent, both above the underpass retaining wall, should be intensification corridor to hide the mess and provide a little more (triple-glazed) housing.</p>	<p>These areas are within the town centre and adjacent. As such the Council will be supportive of development that improves the quality of the local environment.</p>	No change
5.2 East		Harini Boteju	<p>Will a CPO on Neasden Goods yard be undertaken to improve local residents' air quality? Is there local public health data for this area that would help achieve development to improve public health outcomes for existing residents/workers and new ones?The incorporation of biophilic design each site's brief would be in better conformity to the Mayor's Environment Strategy (2018)</p>	<p>No CPO will occur on Neasden Good's Yard to improve air quality. The high standards sought, particularly in relation to for instance the London Plan Urban Greening Factor will ensure that a greater emphasis is placed on the greening of development.</p>	No change

NORTH

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.3 North	BP3	John Cox	Add to Policy BP3: "Reduce the traffic dominance and enhance A4006 Kingsbury and Kenton Roads intensification corridors through implementing public realm improvements and possible new fixed infrastructure for people travelling between Harrow town centre/Northwick Park Hospital and beyond in the west, and the A5 and beyond in the east, using zero-emission vehicles.	The Kenton Road is a heavily trafficked street that has a poor public realm/ pedestrian experience. Kingsbury Road has had some recent public realm improvements, particularly within the town centre, but it is accepted that it could be improved along Roe Green Park frontage.	Add to policy BP3 y) by identifying the Kenton Road and Kingsbury Roads.
5.3 North	BP3	Department for Education	Welcome the reference to "Explore opportunities for additional secondary school provision within this place". Would like this to be translated into a specific site allocation for the school in the next iteration of the plan. Where possible this should include information on when the school should be delivered to support housing growth, the minimum site area required and any requirements for safeguarding additional land for future expansion of the school. If the school is to be delivered as part of a mixed use development land for the school should be provided at nil cost and that the development should make contributions to the construction of the school,	At this stage the Council's education team are unclear on longer term needs and cannot say with any certainty how much education will be needed and where. Primary provision is catered for adequately now and plans are in place for suitable secondary places through the Chancel House site and extending two secondary schools in the borough.	No change.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			commensurate with the need generated by the development.		
5.3 North	BP3	Frederick Murray	Further detail needed on public transport improvements. Suggest that a bus service between Colindale Station and the Colindale Shopping area would be a huge improvement and reduce the number of car journeys that are now made. Should reference to the Art Deco styled Curzon Cinema in Colindale although there was mention of the old cinema in Burnt Oak.	The council regularly liaise with TfL on the bus network. This suggestion will be shared with colleagues in Transport. Reference added to former Curzon Cinema in introduction text.	5.3.7 add: "Two Art Deco cinemas of note include the Grade II listed Savoy Cinema (last used as a bingo hall) and the former Odeon Theatre, now Hurricane Snooker Rooms."
5.3 North	BP3	Harini Boteju	Should be an explicit requirement for buildings to incorporate biophilic design at the outset of a new proposal. The Council needs to ensure cost of maintenance is not overly passed on to new residents/tenants.	In the interests of keeping technical language to a minimum the term biophilic design is not used. However, the policy requires planting and landscaping along the A5, in addition to new open spaces. Policy on maintenance of open space is covered in green infrastructure chapter.	No change
5.3 North	BP3	London Borough of Harrow	Supports the vision for Burnt Oak, which would see it develop a clear identity through implementing public realm, building upgrades and shop façade improvements. Supports the vision for Kingsbury, agreeing that this is a location for less intensive development and an opportunity to improve this town centre as a more desirable destination,	Noted. To be discussed further in a Duty to Cooperate meeting and future on-going meetings.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			especially for night time economy. Would welcome the opportunity to hold further discussions with Brent in relation to how this would be achieved cross administrative borders, to ensure the success of the wider district centre.		
5.3 North	BP3	Philip Grant	Agree entirely suburban character of most of this area should be protected, along with Fryent Country Park, and that the heritage of the Trobridge-designed homes should be protected and enhanced.	Noted.	No change
5.3 North	BP3	Veenay Chheda	Area suffers from overpopulation, which is causing strain on services. Concern public drinking, stabbings, increased crime levels, fly-tipping, potholes, increased traffic due to large vans and trailers using residential areas for business for non-approved use in non-work hours. Objects to biodiversity areas in parks.	Development will be required to contribute to infrastructure needed to support development, including through CIL and Section 106. Detailed concerns will be shared with Area Managers, Highways and Parks Services.	No change
5.3 North	BP3	Mike McCall	Kingsbury High Street is dynamic and thrives, but lacks coherence and identity. To improve propose a weekly food market, limit betting shops, improving the leisure facilities, parking and dining options in Roe Green open space and at Fryent Country park, promoting arts and community spaces, providing affordable housing for single person households,	The Plan includes policy to limit betting shops and to secure affordable housing. Suggestion on potential for a market will be shared with the Town Centre Managers and for Roe Green with Parks Service.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			highlight Kingsbury's proximity to Wembley.		
5.3 North	BP3	Jonathan Plunkett	Object to the A4006 Kenton Road from Preston Hill westwards to Kinross Close being marked as an Intensification Corridor. With the exception of church buildings, there are no structures of more than two storeys Would not be consistent with character which is predominantly two storeys, with exception of churches.	Intensification corridors are main roads with PTAL 3 or above. Preston Hill to Kinross Close meets these criteria. Policy BD1 identifies heights that would be appropriate subject to other policies being met, this includes impacts on local character.	No change
5.3 North	BP3	London Borough of Harrow	Locating development at an intensified level at a more sustainable location broadly accepted by Harrow. Would welcome future discussion to progress masterplans for Kingsbury, to allow for a comprehensive vision for this town centre.	Noted. To be discussed further in a Duty to Cooperate meeting.	No change
5.3 North	BP3	TfL Commercial Development	Agree that development should respect local character and context, but believe the limitation on building heights within Part (b) of Policy BP3 North, of between five and six storeys in town centres and intensification corridors is overly restrictive. Draft London Plan Policy D6 supports a case by case approach to determining optimal development densities, depending on location specific criteria including local context, local infrastructure capacity and existing and planned connectivity and accessibility.	The Council has considered these matters in the Tall Buildings study. As such it considers the approach that it has taken in terms of heights outside the areas identified for much taller buildings as an appropriate approach taking into account the existing character of those areas. Where exceptions to policy can be justified greater height might be possible, but it is for applicants to show that this is appropriate, rather than the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Support policy to encourage residential development in town centre locations, including on upper floors, and making efficient use of land. Under Policy BP3 North suggest that further reference should be made to supporting development within areas of strong public transport accessibility.	council allowing a haphazard approach to where tall buildings can be delivered.	
5.3 North	BNSA1 & 2	London Borough of Barnet	Brent's sites at the Capitol Way Valley and Colindale Retail Park are adjacent to the Colindale Regeneration Area, and Barnet seeks a coordinated approach to development in this area. Building heights along the A5 should be carefully assessed in relation to the local context, and avoid creating a continuous 'wall' of buildings that could lead to an undesirable 'tunnelling' effect.	Noted. Discussed further at a duty-to-co-operate meeting. The Council will input into Barnet's A5 tall buildings study so that a co-ordinated approach to the area occurs.	No change
5.3 North	BNSA1	Aberdeen Standard Investments (partial site owner)	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.	Development capacity has been derived from using standard density matrices in the current London Plan, similar in approach to the London SHMA. Additional detailed work on the sites in their progression through to full applications may show that greater capacity is appropriate and can be attained. However in the absence of this evidence and taking account of the need to meet	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				Brent's provide capacity status for industrial uses in particular, the current estimates are considered appropriate.	
5.3 North	BNSA1	Veenay Chheda	Opposed to an increase in residential development as it will increase 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.	Specific concerns highlighted to colleagues in Highways.	No change
5.3 North	BNSA1	Greater London Authority (GLA)	The reconfiguration of LSIS should follow the approach set out in Draft New London Plan Policy E7 and as Brent is a 'provide capacity' an increase in industrial floorspace capacity should be sought	This is highlighted in the planning considerations text of the site allocation and reflected in the allocated use.	No change
5.3 North	BNSA1	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure.	Infrastructure Requirements: Thames Water has indicated upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
					creating identified additional capacity requirements.
5.3 North	BNSA1	Universities Superannuation Scheme (USS)	USS is generally supportive of the aims of the Plan and site allocation at Capitol Park Site, but considers sufficiently flexibility is needed to allow other complimentary uses to come forward at existing employment sites should market demands for employment change in the future.	Brent is identified as a 'provide capacity' borough in the London Plan as such industrial sites are to be protected and intensified.	No change
5.3 North	BNSA2	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure.	Infrastructure Requirements: Thames Water has indicated upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.3 North	BNSA3	Veenay Chheda	Objection on the grounds housing will increase car parking on Honey Pot Lane.	Impact on the transport network would need to be fully assessed	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Concerns safety and that people outside B&Q and other hardware stores are impacting on residents.	through the detailed masterplan, and any potential impacts on the road network mitigated through the planning application process. Redevelopment would improve safety by creating a mixed-use development which is well used throughout the day and evening.	
5.3 North	BNSA3	SHD Stanmore Ltd	Supportive, in principle, of the proposed site allocation, but seek clarity as to whether the Council expect the whole Queensbury LSIS allocation to come forward for redevelopment under one masterplan or whether schemes can come forward on a site by site basis. Consider that sites should be able to come forward on an individual basis, given landownership and the different mix of uses proposed in each of the different land parcels. Note standalone development coming forward at Unit 3 and Unit 4 Lowther Road.	London Plan policy E7 states co-location is to be delivered as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. The supporting Industrial Intensification and Co-location Study confirms no net loss is to take account of the wider designated industrial site. Honeypot Lane comprises two distinct designated industrial sites - Lowther Lane to the north and Honeypot Lane to the south. As such no net loss will apply to each of these designated sites individually.	No change
5.3 North	BNSA3	Greater London Authority (GLA)	The reconfiguration of LSIS should follow the approach set out in Draft New London Plan Policy E7 and as Brent is a 'provide capacity' an increase in	Text in planning consideration states Brent is a provide capacity borough. Reference to an increase	Planning considerations: The site contains two locally significant industrial sites. The

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			industrial floorspace capacity should be sought	in industrial floorspace added for the avoidance of doubt.	intensification and co-location of these sites will be consistent with the London Plan, which has identified Brent as a 'provide capacity' borough. No permissions for non-employment uses within the LSIS will be allowed in advance of masterplans being approved which show how intensification/ co-location will be achieved to result in an increase in industrial floorspace.
5.3 North	BNSA3	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure.	Infrastructure Requirements: Thames Water has indicated upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
					creating identified additional capacity requirements.
5.3 North	BNSA3	Mike McCall	This site should not be used for more retail floorspace, as there is sufficient at Kingsbury and Colindale. There is an opportunity instead to provide affordable creative workspaces.	Noted. Whilst the existing supermarket would be retained the allocation outlines additional retail floorspace would not be appropriate sequentially. As a Locally Significant Industrial Site employment floorspace will be required.	No change
5.3 North	BNSA3	UK & European Investments	UK&EI strongly supports the principle of this allocation, the proposed co-location of uses and a masterplanning process. Site capacity, density, height and massing should be determined through a masterplanning process and the allocation should not specify a number.	It is appropriate for the site allocation to set parameters for the development to inform a detailed masterplan. It is accepted that the masterplan process might test these assumptions and result in a different capacity. Nevertheless, in the absence of greater detail of testing the Council considers the parameters identified as appropriate.	No change
5.3 North	BNSA3		Concern insufficient provision in parking, GP services, shops, and children's amenities to accommodate 190 additional dwellings. The current Morrisons site is vital for residents within this catchment area and needs to be retained in its current size. Support the need for physical improvements, noting	In the case of this site some facilities will need to be provided on site, including play space and open space. Additional facilities needed will be identified through a masterplanning process. Other infrastructure off-site might be required and this will be identified	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			the unsightly and underused industrial areas.	in the Infrastructure Delivery Plan. The supermarket is to be retained on site, but no additional retail will be sought as any additional retail development will be directed to existing town centres in the first instance.	
5.3 North	BNSA4	Sport England	Sport England notes the Mecca Bingo allocation is for community use and strongly recommends that given the lack of facilities in the area new sports facilities should be considered.	The type of community or leisure use will in part be dependent on the impact on the Grade II listed building. Sport would be welcome as it sits within D2 use class, but cannot be insisted upon as the only appropriate use.	No change
5.3 North	BNSA4	Thames Water	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the water supply network and water treatment infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	The existing building is to be retained and better utilised for community and cultural uses with some residential. The building will require a unique and sympathetic response. Without a specific user or use identified the council cannot make an informed assessment on development capacity, nevertheless it is considered that the requirements of this development will not be any more significant than the adjacent residential development that has been adequately accommodated in relation to its water demands.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.3 North	BNSA4	Veenay Chheda	There is already a significant traffic and parking problem here.	Noted. Development would be subject to a detailed Transport Assessment. Mitigation will be required if otherwise development would cause significant adverse impacts on the transportation network.	No change
5.3 North	BNSA4	Theatres Trust	This was formerly the Savoy Cinema, and is understood to have had some limited theatre use during its history. Supportive of the design principles for this site in particular ensuring development preserves its areas of interest and significance. We also welcome that community floorspace within the site is promoted.	Noted.	No change
5.3 North	5.3.32	London Borough of Harrow	Both Burnt Oak and Kingsbury are located across Harrow and Brent Local Authorities. Welcomes the guidance principles for both centres and reference to a co-ordinated approach to Burnt Oak. Would also welcome such an approach to Kingsbury also.	Agreed. The paragraph can be amended to also make reference to Kingsbury.	5.3.32 Burnt Oak, Colindale and Kingsbury town centre boundaries are across two or more boroughs. The council will seek to adopt a co-ordinated approach to these centres.
5.3 North		John Cox	A4006 Kingsbury and Kenton Roads should be studied as a new north-London orbital tram route. The roads are wide enough for segregated cycle paths, tram lines and lanes for road traffic. This	Suggestion noted but the strategic priority for funding is the West London Orbital at present.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			would connect Harrow via Northwick Park Hospital to Sudbury Stations to the south and towards Barnet and the A5 to the east.		
5.3 North		Alfred Garfield	Concern car free development results in cars parking on street. Need to ensure there is sufficient infrastructure to support development.	Car free development is subject to a Controlled Parking Zone being in place in the surrounding area. The Local Plan is informed by evidence on the need for infrastructure.	No change
5.3 North		Mike McCall	Overlooks potential for the North to be a creative hub. Subsidised community facility needed to support integration of diverse communities.	Brent Workspace Study currently identified a lack of demand for creative workspace in the north of the borough, however, the redevelopment of Honeypot Lane LSIS and securing new employment floorspace as part of this an opportunity to create a cluster of employment uses and a catalyst to increase future demand.	No change
5.3 North		Veenay Chheda	Make the pavements safer. Ensure cyclists stay on the roads.	Improved cycle routes as proposed in the Local Plan, will improve cycling conditions and deter cyclists from using pavements.	No change

NORTH WEST

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.4 North West	Figure 19	Elizabeth Gaynor Lloyd	Map illustrates the importance of Northwick Park as open space in a borough with a deficiency in green space.	Noted.	No change
5.4 North West	BP4	Harini Boteju	Photo used is of Neasden subway which is not in North West area. Use of Healthy Street Approach should be included in policy or vision wording	Agree photos and images to be amended. Healthy Street standards is included in wording of BP4 and transport policy BT1.	Images to be amended
5.4 North West	BP4	A.J. Sutherland	<p>Churchill, Rushout and Northwick Avenues should have been included in a Conservation Area. Roads are congested and filled with commuters' parked cars during the day.</p> <p>Kenton Sainsbury's changed the design of the store shortly before the planning application was decided against strong local opposition.</p> <p>The GP surgery on Kenton Bridge is currently coping with patient numbers but will need extra facilities going forward. Homes are being rented out to sharers, disregarding licensing rules, and are neglected. Rubbish is often dumped outside.</p> <p>Hillrise Court, 135 Kenton Road, was a hideous mistake. It is an eyesore. High-rise flats are inappropriate for Kenton.</p>	<p>The heritage officer has reviewed Churchill, Rushout and Northwick Avenues and considers them not of a high enough quality to be recommended for conservation area status. Conservation area status has no impact on on-street parking stress.</p> <p>The Kenton Sainsbury's site has been built in accordance with approved plans.</p> <p>The council works closely with Brent Clinical Commissioning Group (CCG) to ensure that healthcare demand is planned for and met across the borough. The infrastructure required within the plan period will be set out within the accompanying Infrastructure</p>	Include within BNWGA1 Design Principles 2nd bullet point: "provision of additional trees".

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			<p>Large development in the Northwick Park Growth Area will result in more traffic congestion. Not enough is being done to enhance Northwick Park and the Ducker. The aspiration in the Local Plan to improve them is supported. More trees should be planted.</p> <p>Underused industrial brownfield land should be developed for housing. The council's decision to consult the public is welcomed.</p>	<p>Delivery Plan, with associated funding and level of priority. Brent is proposing to introduce more selective licensing across the borough. This will improve the quality of management of private landlord stock. The Council's environmental teams can deal with rubbish on private land where it is shown to be causing health problems.</p> <p>Kenton has not been designated as an area appropriate for the development of tall buildings. However, due to the character of the area, some areas along primary roads have been allocated as 'intensification corridors' which will permit the development of 5-6 storey buildings, providing they're sympathetic to the surrounding character and do not negatively impact upon existing residents.</p> <p>Due to the high Public Transport Accessibility Levels (PTAL) within the Northwick Park area, much of the development will be car free, with an aim for residents to use more active modes of transport, and public transport. In order to cope with the anticipated</p>	

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				<p>increases in vehicle use within this area, the development of the site will include junction improvements at Watford Road.</p> <p>Within the site allocation it sets out the requirements of development to improve the green infrastructure of Northwick Park and the Ducker Pond site, and its ability to cater to a wide range of residents' needs, and the needs of local wildlife.</p> <p>The Council is seeking to maximise development on brownfield land.</p>	
5.4 North West	BP4	David Pearson	<p>Support the proposal to maintain the urban character of the area and the quality of its open spaces. Concern that the Northwick Park Growth Area may lead to a loss of green open space. Suitable infrastructure must be provided with development.</p>	Support noted. Northwick Park is protected as Metropolitan Open Land so there will be no net loss of green space as specified in the site allocation.	No change
5.4 North West	BP4	London Borough of Harrow	Support the overall vision of retaining, and enhancing the characteristics of this areas metro-land past.	Noted.	No change
5.4 North West	BP4	John Cox	Amend wording of policy to include safeguarding of land for a new double-track chord between the Chiltern Railway Aylesbury Branch and the West Coast Main Line DC tracks, with a suitable land swap to maintain the quantum of	There is already an interchange between Northwick Park and Kenton on the two lines. It would be prudent potentially to include step free at South Kenton and Kenton station as this is the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Metropolitan Public Land. Include policy to reduce the traffic dominance and enhance A4006 Kenton Road and A404 Watford Road through implementing public realm improvements and possible new fixed infrastructure for people travelling between Colindale/Kenton/Harrow town centre in the north, via Northwick Park Hospital, and Sudbury & Harrow Road and Sudbury Town stations or Sudbury Hill Harrow and Sudbury Hill stations in the south, using zero-emission vehicles.	existing interchange between the two lines that are mentioned. In addition, there is a committed rail scheme which is extending the Aylesbury branch to Milton Keynes which should be completed in the next 5 -7 years which also provides a link further up the line between the two rail lines and therefore is not likely to need a further connection. Reduced traffic dominance is covered more explicitly through LIP3 and existing Transport Strategies. The local Plan reference to Healthy Street Approach is sufficient.	
5.4 North West	BP4	TfL Commercial Development	Reference should be made to the potential of optimising densities and building heights in areas with high PTAL to unlock sites outside Growth Areas.	Densities should be optimised in line with London Plan policies. However, development outside growth areas, town centres and intensification corridors which is where appropriate taller building heights are identified should be complementary to the existing low-rise character of the North West place.	No change
5.4 North West	BP4	Al Jugoo	This document does not address step-free access at Preston Road tube station. The same strategy proposed for	The council will continue to engage with TfL on increasing stations in the borough with step free access. Northwick Park is	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Northwick Park station should be used at Preston Road.	identified as a specific priority as it will serve a proposed growth area.	
5.4 North West	BP4	Al Jugoo	The document fails to address the excessive number of fast food outlets, gambling shops and convenience stores selling alcohol on Preston Road. They promote unsociable behaviour and promote unhealthy diets.	Fast food outlets and gambling shops are covered by policy BE5. The sale of alcohol is controlled through licensing rather than planning. Brent will be reviewing its licensing particularly of off-sales taking account of the potential to reduce on-street drinking/ anti-social behaviour that occurs in some areas.	No change
5.4 North West	BP4	G A Vickers	Town centre is not a destination but a place to pass through. Northwick Park pavilion to be enhanced, and St Cuthbert's church hall needs improvements	The Playing Pitch Strategy, which forms part of the evidence base for the plan, identifies the need to enhance playing pitches to meet existing and future demand. The recommendations of the study are reflected in the plan and Northwick Park pavilion is subject to potential relocation/improvement as part of the growth area policy. The community may wish to pursue a bid for Neighbourhood Community Infrastructure Levy for the church hall.	No change
5.4 North West	BNWSA1	Al Jugoo	The document fails to address the congestion in the Nash Way roundabout area. More development will increase congestion, potentially affecting	Site allocation BNWSA1 includes the following text: 'The streetscape, particularly the mini-roundabout on Nash Way is an	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			emergency service vehicles going to/ from the hospital. The council must provide clear and safe access to the hospital before any building works.	insensitive over-engineered solution that provides a poor pedestrian environment. Improving this needs to be part of a development solution.' It also includes reference to the need of a transport assessment. Combined, these two pieces of text will facilitate the consideration of transport improvements within the Nashway roundabout area upon development. Northwick Park site allocation BNWGA1 includes clear detail surrounding the need to ensure the movement of vehicles, including emergency vehicles, is not inhibited in any way.	
5.4 North West	BNWSA1	London Borough of Harrow	Agree that a replacement or similar use be retained in this location as part of any intensification.	Noted.	No change
5.4 North West	BNWSA1	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy	Text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing

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			requirements, including achieving greenfield run off rates.		planto ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.4 North West	BNWGA1	Vishal Sinha	Brent does not need any more high rises. The justification that the presence of tall buildings at Northwick Park Hospital is sufficient to allow more high rises is misplaced and misleading.	Brent has been set a significant housing target by the Mayor of almost 30,000 homes over the next 10 years. The potential for tall buildings to help meet this target has also been identified through the London Plan in policy D8, and policy BD1 in the Brent Local plan. Given the limited land available, and the multiple pressures on this land, it has been decided that in order to help meet this target Brent will utilise tall buildings. This enables development to be concentrated in smaller, high density pockets within the borough. These areas have been identified in the tall building strategy which includes Northwick Park as an area which is suitable for tall buildings. This has been decided due to its existing character, its overall isolation away from other sensitive receptors, and	No change

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				<p>its high Public Transport Accessibility Level (PTAL). Together these factors enable more efficient, and less obtrusive development to take place, whilst also helping Brent and the wider London area to meet its housing need.</p>	
5.4 North West	BNWGA1	London Borough of Harrow	<p>Whilst there is no objection to the allocation, the council must recognise the sensitivities of the adjacent land located within LB Harrow as well as infrastructure requirements that would come from the anticipated growth.</p>	<p>Noted. The Council has a Statutory Duty to Cooperate. Due to the size of this proposal it is key that the Council collaborates with its local strategic partners, including that of the neighbouring borough of Harrow. The site will be subject to a masterplan led approach, coordinated by the One Public Estate and infrastructure requirements will be identified as part of this process. The Council has been granted a £9.9 million Housing Infrastructure Fund to help improve the sites infrastructure where necessary. It is possible that ring-fencing Community Infrastructure Levy contributions will occur for the purpose of infrastructure improvements to the Northwick Park area.</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.4 North West	BNWGA1	Elizabeth Gaynor Lloyd	No possibility of meaningful comment unless the proposals within the Growth Area are defined. This area was previously referred to as a Regeneration Area; why has the terminology changed with no explanation?	Regeneration Area in the title was a typo which should have been Growth Area. The Northwick Park growth area development plans are in their infancy, with no currently agreed upon detailing. The site will be subject to a masterplan led approach coordinated by the One Public Estate. This process will include extensive public engagement through consultation.	Amend policy title to: "Northwick Park Growth Area."
5.4 North West	BNWGA1	Marion Bond	Northwick Park open space should be protected. Area is not appropriate for tall buildings due to surrounding low-rise character, which should be preserved	Support noted. Northwick Park is protected as Metropolitan Open Land so there will be no net loss of green space as specified in the site allocation. New development at its tallest will generally reflect the height of the tallest existing buildings on the site.	No change
5.4 North West	BNWGA1	Andy Brommage	The design principles for BNWGA1 do not mention sight lines associated with Harrow on the Hill and surrounding Metroland heritage areas. Height must be limited to protect these views.	Noted. Schedule 3 of Harrow's Development Management Policies Plan identifies the views of importance to and from Harrow. The Northwick Park Growth Area Allocation does not fall within any of the boundaries identified, although is at the edge of a much more distant view from Pear Wood Stanmore. In relation to the	BNWGA1 Planning Considerations 3rd Paragraph add a third sentence: "Consideration should also be given to impact on the locally protected views as identified in the Harrow Local Plan."

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				protected views in Harrow, it is observed that some very tall buildings are being erected to the north of Harrow on the Hill. The masterplan will be subject to wider consultation and contain a more detailed analysis of views. The policy makes reference to building heights responding to the existing hospital building heights. Consideration of the impact on protected views in Harrow can be added to the policy to ensure this matter is suitably addressed.	
5.4 North West	BNWGA1	Sport England	A ball strike assessment should be undertaken so that it is clear that any development adjacent to the playing field would not detrimentally affect sport being played. This should be made clear within the allocation text. Any existing sports facilities would need to be replaced and the impact on facilities of increased population should be mitigated through enhancement or new provision.	Given the importance of the MOL as a recreation space and its inclusion of playing pitches and a golf course, this is considered appropriate to ensure these activities are not compromised by complaints from new development.	Policy BNWGA1 add to planning considerations: "A ball strike assessment will be required to ensure that new development does not compromise the role of the MOL in terms of sports provision."
5.4 North West	BNWGA1	Al Jugoo	This document does not address the congestion at Northwick Park roundabout. More development will increase congestion, potentially affecting emergency service vehicles going to/ from the hospital. The council must	Sections T - W of policy BP4 outline the proposed intentions for transport improvements within the north west place. This includes improvements to stations, in addition to their linkage;	No change

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			provide clear and safe access to the hospital before any building works.	improvements to junctions; and improved pedestrian and cycling infrastructure. Together these improvements are designed to increase sustainable and active transport uptake through multi-modal infrastructure improvements and alleviate pressures on the road network through reduced car dependency. The site allocation includes detail surrounding the need to ensure the movement of vehicles, including emergency vehicles, are not inhibited in any way. Improvements to junctions around the Northwick Park growth area should help improve the flow of traffic. A masterplan for Northwick Park will be informed by a transport assessment and improvements to public transport, the road network, and walking and cycling routes secured as identified. Northwick Park benefits from close proximity to Northwick Park Station, but there is an opportunity to improve pedestrian connections to the station.	
5.4 North West	BNWGA1	Thames Water	The scale of development/s is likely to require upgrades to the wastewater	Text to be added to policy under infrastructure. London Plan policy	Thames Water has indicated the scale of

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			<p>network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.</p>	<p>requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.</p>	<p>development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p>
5.4 North West	BNWGA1	Philip Grant	<p>There has been no prior public consultation on the Northwick Park Growth Area. No part of the park, which is Metropolitan Open Land, should be treated as part of this preferred policy option</p>	<p>The site allocation for the growth area primarily encompasses the existing hardstanding which contains the hospital and university. The small section within the allocation which includes MOL land is to be re-provided elsewhere as part of a comprehensive development to improve the areas openness and utilisation with the MOL itself receiving improvements, as outlined in London Plan policy G3. The site was included within the current local plan which underwent consultation. Proposals for</p>	No change

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				Northwick Park is in its infancy and will be subject to a masterplan approach. During this process the development of the site will undergo extensive scrutiny including significant public engagement through consultation.	
5.4 North West	5.4.42	Elizabeth Gaynor Lloyd	Reference to road safety is meaningless unless the council publishes the transport research which has been carried out.	The evidence base for the Local Plan includes the Brent Long Term Transport Strategy, Brent Walking Strategy, Brent Cycling Strategy and Local Implementation Plan 3. These are cross-referenced in the chapter on Transport and were available for comment alongside the Local Plan. The junction to Northwick Park hospital is poor and a significant improvement to this will be part of the development. The Council has secured Government funding for this improvement, although the detailed design and location of the change have not been confirmed.	No change
5.4 North West	5.4.4	Elizabeth Gaynor Lloyd	Sudbury Court Drive does not "consist of predominantly semi-detached housing" though the houses do vary in style. The Metroland nature of the area has been largely destroyed by unsympathetic and out-of-context development	Noted. Having reviewed the area with the Heritage Officer, it has been concluded that the area is not predominantly semi-detached housing and is more of a mixed nature.	Paragraph 5.4.3. amend final two sentences to: "Another key character area within this place can be around Sudbury Court Drive, consisting of large

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					houses which vary in style, with dwellings which predominantly consists of semi-detached housing that vary in style. Houses along both sides of the road having large front gardens, and are being set back from the main road by a pathway, access road and grass verge."
5.4 North West	5.4.18	Elizabeth Gaynor Lloyd	On Pebworth Road, applications for increasingly out of context developments have not been the subject of any planning controls on appearance. The area's character and its careful original planning and Metroland appearance has been completely destroyed.	Whilst some properties on Pebworth Road exhibit Metroland characteristics such as half-timber frontages and leaded windows it now has no significant uniformity of character in terms of building materials or style. It is not a designated heritage asset. Many of the homes have been subject to extensive changes allowed under permitted development such external materials, windows, roof and side extensions and paving over front gardens which has affected its original character to a large degree. It is against this background that the council has to consider character and determine	No change

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				the harm caused by applications. The council has recently reviewed its detailed design guidance on household extensions and alterations. This applies where planning permission is required and is contained in a Supplementary Planning Document which is a separate document to the Local Plan.	
5.4 North West	5.4.20	Elizabeth Gaynor Lloyd	The Northwick Park Hospital buildings are pejoratively described as a stark contrast to the soft landscaping of Northwick Park MOL due to its scale and visibility in para 5.4.3. Yet para 5.4.20 promotes further stark contrast and expansion of that inappropriate setting.	The proposed development will be designed to have variety in bulk, scale and mass and be comprised of a variety of designs and materials. This development will reduce the impact of the monolithic presence of the hospital when viewed from the north, south and west.	No change
5.4 North West	5.4.29	Elizabeth Gaynor Lloyd	The sports pavilion is on Metropolitan Open Land although para 5.4.29 states that it is not. There is not enough detail on final design or location of the new pavilion.	Paragraph 5.4.29 does not state that the sports pavilion is not on MOL. The Northwick Park growth area development plans are in their infancy, with no currently agreed upon detailing. The site will be subject to a masterplan led approach coordinated by the One Public Estate. This process will include extensive public engagement through consultation.	No change

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				The location of the pavilion will be made in association with the Council team that manages the open space/ pitches and the users of the pavilion.	
5.4 North West	5.4.30	Elizabeth Gaynor Lloyd	There is no evidence of a local desire for a "community hub" or opportunity to influence what might be in it during public consultation.	The desire for a community hub was expressed at the public consultations during the local plans issues and options phase. Details surrounding the hub have yet to be established, with text from the local plan stating: 'The exact nature of the 'local hub' will be informed by community consultation.'	No change
5.4 North West	5.4.34	Elizabeth Gaynor Lloyd	Referring to the "Growth Area" makes no sense without understanding what the exact boundaries of the Growth Area are. It would be better to keep existing green space than take land and swap it for pocket parks.	The red line for the growth area boundary is found on the map accompanying Northwick Park Growth Area (BNWGA1) on page 118. The proposed land swap is to ensure there is no net loss of Metropolitan Open Land. The swap would entail the movement of the sports pavilion to a more	No change

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				<p>appropriate location with greater footfall, increasing the utilisation of a more modern facility. This would also serve to improve the feeling of openness within the park. Pocket parks are proposed in addition to this, not as a substitute. The relocation of open spaces within the red line boundary will provide open spaces that are better designed/ overlooked and potentially provide continuity with the MOL.</p>	
5.4 North West	5.4.36	Elizabeth Gaynor Lloyd	<p>The "consultation" does not specify what is meant by "improvements". Concern that this will involve more hard surfaces and buildings, threatening what wild life we have left.</p>	<p>Consultation, with both the public and other necessary stakeholders will determine the improvements which are required. In line with London Plan policy G3, there will be no net loss in MOL. New development will need to be designed to achieve net gains in biodiversity and an Urban Greening Factor, in accordance with the London Plan and Local Plan policy. The existing development has limited soft landscaping, therefore this would require an increase in planting.</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.4 North West	5.4.37	Andy Brommage	More emphasis should be made of the biodiversity of the habitats within the Northwick Park area.	Noted. Open space and biodiversity, page 116. The section does include reference to the required improvement of open spaces, and to the value of the biodiversity within the place, with particular reference to Duckers Pool and associated SINC assets. However, it does not explicitly state that improvements to open space should be for improved biodiversity which perhaps should be made clear given its importance.	Amend Policy BG11 to state a net gain in biodiversity will be required.
5.4 North West		John Cox	A4006 Kenton Road, A404 Watford Road and Sudbury Court Drive should all be studied as two alternative new north-London orbital tram routes.	Suggestion noted but the strategic priority for funding is the West London Orbital at present.	No change
5.4 North West		David Pearson	Agree with conservation areas as listed but not with the reduction proposed.	Rationale for conservation area boundary changes is set out in the Historic Environment Place Making Strategy. Comment to be shared with Principal Conservation Officer. Any amendment to the boundary will be subject to further detailed consultation in the affected area. Changing boundaries is a statutory process which will be subject to its own consultation.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.4 North West		London Borough of Harrow	Support the aspirations of the Local Plan relating to Kenton Road town centre. There may be an opportunity to progress a masterplan for the town centre to ensure comprehensive future development.	Support noted. Opportunity for joint working to be explored.	No change
5.4 North West		Andy Brommage	Generally, the document makes sense. I am not aware of a Butler's Green open space in that area.	Support noted. Butler's Green is the triangular open space located at the junction of A404 Watford Road and A4005 Harrow Road.	No change
5.4 North West		John Cox	There is potential for direct trains between Buckinghamshire and Old Oak Common Crossrail/ HS2 station.	This is noted but outside the scope of the Local Plan as there is no timetable for its consideration and clear expectations in relation to for instance the need for additional land for associated infrastructure improvements.	No change
5.4 North West		Elizabeth Gaynor Lloyd	Northwick Park is not referenced in the environmental strategy. There has been no public consultation on its designation as a Growth Area. All reports related to the site by consultants should be made public. Information has been withheld and the process has been secretive.	The site allocation for the growth area primarily encompasses the existing hardstanding which contains the hospital and university. The small section within the allocation which includes MOL land is to be re-provided elsewhere as part of a comprehensive development to improve the areas openness and utilisation with the MOL itself receiving improvements under, as	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				outlined in London Plan policy G3. The site was included within the current local plan for which it underwent consultation. The new allocation is in its infancy and will be subject to a masterplan approach under the One Public Estate. During this process the development of the site will undergo extensive scrutiny including significant public engagement through consultation.	
5.4 North West		Apartments for London	Request for site allocation at Preston Road for approximately 250 units of 100% genuinely affordable housing. Tall buildings should be appropriate on certain parts of the site.	Noted. Having thoroughly considered the site, it will not be identified as a site allocation. The site is greenfield. It is a Grade I SINC noted in the most recent SINC review as relatively diverse by comparison with other lineside sites. An ecological assessment undertaken as part of a pre-app has indicated that the adverse impacts on the SINC by the extent of development sought cannot be adequately mitigated either on site or in the locality. In addition to this the site also has a poor PTAL of 2, meaning parking is likely to be required with resulting car dependency increasing potential	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				for traffic congestion and associated pollution.	
5.4 North West		Sunil Patel	No more flats should be built. Flats are too expensive. Concern pressure on road infrastructure, schools, shops, healthcare and green spaces.	A range of homes are needed to meet Brent's housing need. This need is driven by natural population growth (births exceeding deaths) and migration. The Plan includes policies to secure a range of housing including affordable and intermediate. The Plan is informed by evidence on the future need for infrastructure including transport, healthcare, schools, retail and open spaces and this is reflected in its policies. The Plan supports a move to active and sustainable travel (walking, cycling and public transport) to reduce pressure on the road network.	No change
5.4 North West		Elizabeth Gaynor Lloyd	Comment regarding details on page 112. No specific details given as to the proposed improvements at the Northwick Park development and therefore impossible to provide meaningful comments. This goes with specific reference to the proposed improvements to the quality of open space and sports facilities within this place, which notes a potential cricket pitch, therefore implying	Noted. Page 112 sets out a summary of challenges and opportunities for this place. The Playing Pitch Strategy, which forms part of the evidence base for the plan, identifies the need to enhance playing pitches to meet existing and future demand. The recommendations of the study are reflected in the plan. The	Amend opportunities bullet point 10 to: "Implementation of cycleway and other schemes within this place, in line with the Transport Strategy, to improve active travel. Enhancements to the Capital Ring and other

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>specific detailing does exist and has not been publicly consulted upon. This will have implications on permeability and therefore flooding, for which the area is of high concern and should be addressed comprehensively. Reference is made to improving the capital ring, however, there is no mention to the improvements of other Public Rights of Way (PROWS), many of which lay outside the Capital Ring. Clarification is required as to what is meant by 'Quietways'.</p>	<p>Northwick Park growth area development plans are in their infancy. The site will be subject to a masterplan led approach. This process will include extensive public engagement through consultation. Quietways is a term used by TfL for cycling routes which are separate to the road network. Wording to be changes to cycleways for clarity.</p>	<p>pedestrian routes within Northwick Park."</p>
5.4 North West		Patel	<p>There are no plans to address traffic, particularly school traffic, which is a significant issue in the area.</p>	<p>Sections T - W of policy BP4 outline the proposed intentions for transport improvements within the north west place. This includes improvements to stations, in addition to their linkages; improvements to junctions; and improved pedestrian and cycling infrastructure. Together these improvements are designed to increase active and sustainable travel uptake through multi-modal infrastructure improvements and alleviate pressures on the road network through reduced car dependency. All schools that have received planning permission for expansion are subject to Travel</p>	<p>No change</p>

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				Plans which aim to reduce the use of cars by parents for school related journeys.	
5.4 North West		Elizabeth Gaynor Lloyd	Content of the existing site allocation (15. Northwick Park Hospital) for Northwick park site BNWGA1 should be repeated as follows: any proposals 'should conserve and enhance the nature conservation designation and the MOL designation of the Ducker Pond part of the site'. SINCS and areas of importance to nature conservation should not be considered for recreational use where current uses do not exist.	The Ducker Pool section of the SINC is not included within the site allocation and is under separate ownership to that of the allocated site. In terms of potential biodiversity improvements to this space, these will therefore be reliant on the current owner's agreement. The policy can be amended to seek improvements, but it would be unreasonable to require it as the Northwick Park site allocation owners do not have control over it. A blanket ban on recreational activities is not considered appropriate, but should take account of the sensitivity of the biodiversity asset. For example recreational activities may refer to those such as nature trails which are of low impact and help to increase exposure to, and appreciation of, nature.	Amend wording of BNWGA1 planning considerations 5th point second sentence to: "Mitigation measures to address potential adverse impacts should be identified as part of the masterplanning process and ideally improvements to biodiversity implemented to enhance its SINC status."

SOUTH

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.5 South	Figure 23	OPDC	The plan shows Key Employment Sites along the edge of the OPDC area which reflect outdated Strategic Industrial Location boundaries.	Figure 23 will be corrected to remove SIL boundary at Willesden Junction Station.	Correct figure 23.
5.5 South	5.5.4	Sam Dilliway-Davies	Roundwood Park Youth Centre should be included as a notable attraction.	Roundwood Youth Centre is referred to under Character and Culture in paragraph 5.5.4	No change
5.5 South	5.5.9	Sam Dilliway-Davies	Support idea of cycle routes across the borough. Important for reducing congestion, pollution and contribution to climate change. Betting shops and takeaways should be limited. The Church End market is thriving. Invite Raheem Sterling as an ambassador for St Raphael's Estate.	Noted. The Local Plan contains policies to secure safe cycle routes and also limit the number of betting shops and takeaways. Idea regarding Raheem Sterling is outside the scope of the local plan but will be shared with relevant colleagues.	No change
5.5 South	Challenges/ opportunities	Savills on behalf of Tesco Stores	The Ikea and Tesco Extra uses conflict with the SIL designation. Suggest wording is amended to: <i>“Part of Wembley industrial site is occupied by retailers Ikea and Tesco stores, which are established retail destinations. The sites are underutilised, extremely deprived (in the top 20% of the most deprived areas in the country), and poorly connected to the surrounding area and have a low quality setting.”</i> The Tesco site presents a major development opportunity to be addressed prior to the plan progressing further. Other supermarket sites have been identified for mixed use	Other supermarket sites have been identified as potential development opportunities. Nevertheless, these sites are not designated as SIL and are considered to have better environmental characteristics and connectivity to existing residential areas and social infrastructure to promote a high quality residential environment. The lack of connectivity exhibited by the Tesco store is evident in its under-trading compared to store averages. Notwithstanding the representation made to this Plan,	No change

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			<p>development. To ensure a consistent approach to policy, request the Tesco store be considered in the same manner. The assessment should be re-worded to:</p> <p><i>“Better utilise Wembley industrial site, enhancing the overall quality of environment and improving linkages and removing/addressing physical barriers to the surrounding area, the Neasden Growth Area and adjoining site allocations. As a sizable brownfield site within a Strategic Area for Regeneration the development potential of the Tesco site shown be realised via a masterplan approach to optimise multiple land uses including new and/or replacement retail (as part of a new local centre) and a significant quantum of residential floorspace.”</i></p> <p>The site’s current SIL designation is unwarranted as the site has been in retail use since 1982. The current SIL is inflexible in acknowledging that there may be non-conforming uses outside the industrial sector and the opportunities this could provide in terms of mixed use or co-located development. To some extent this is supported by the 2015 Employment Land Demand Study. The Tesco site could have a major part to play in any regeneration of the St Raphael’s Estate and surrounding lands, possibly including a new local centre to support the area. In addition the WLO</p>	<p>Tesco have submitted very limited evidence to support their proposals and are currently pursuing what is essentially a significantly sized scheme typical of an out of town retail/leisure typology. If permitted this would in the medium term (the period to 2029/30) compromise potential development on much of their site. As such there is a lack of clarity of their commitment to realistically pursue a scheme as set out in their representation. Notwithstanding its current use, the proximity to the strategic road network when aligned to its designation as SIL make this site one of the prime locations to meet storage and distribution requirements exhibited within West London. Should the site be available for non-retail uses, given Brent’s emerging status as a ‘provide capacity’ borough, industrial would be the preferred option. Despite its proximity to Neasden station, the pedestrian links in particular are very poor, with little realistic prospect of improvement without a very significant change in the way crossing of the north circular in particular is addressed. This would point to the need for a</p>	

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			and improvement of public transport in the area means that the new Neasden Growth Area should be expanded to include the Tesco site, with a masterplan addressing how to remove the physical barriers to connectivity.	wider area to be masterplanned than just the Tesco site on the other side of the north circular to make this viable and a wider range of uses than the SIL designations surrounding Tesco would allow. In the short to medium term given their existing uses and the draft London Plan policies on SIL there is little prospect of these larger sites coming forward as envisaged in the Tesco representation. On this basis it is not considered appropriate to allocate the site/ wider area for mixed use development, or identify it as part of the wider Neasden Stations Growth Area.	
5.5 South	BP5	HGH Consulting (on behalf of unnamed clients)	Support ambition of creating strong links between Harlesden Town Centre and Old Oak via Willesden Junction. Willesden Junction should be a growth area. Overall support densities but the Council should not seek to limit the scale of development based on these estimates.	Support noted. The OPDC are now the local planning authority for Willesden Junction and policy on this place is included in their emerging Local Plan.	No change.
5.5 South	BP5	John Cox	Policy should include enhancing setting and connectivity of Stonebridge Park station. Should specify land to be safeguarded for a new station at Church End (Taylor's Lane road bridge) and a pedestrian and cycling boulevard to Brentfield Road.	See amendment regarding setting and connectivity of Stonebridge Park station. A feasibility study will identify and determine optimum stations on the WLO to provide a quality service. Feedback shared with council	BP5 u Enhance the setting of Harlesden and Stonebridge Park Stations and their connectivity to the surrounding area through

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				officers involved in taking WLO forward alongside TfL and the other West London Boroughs forming the West London Alliance. Improvements to cycling routes to Abbey Road in Park Royal are being taken forward as part of OPDC work.	wayfinding and public realm enhancements.
5.5 South	BP5	N Kusneraitis	Harlesden has been recognised as a place of Caribbean culture and music. A venue space is needed to showcase musical talent.	Detailed planning policies for Harlesden are contained within the Harlesden Neighbourhood Plan. The Plan identifies the Harlesden Plaza site as the preferred location for a town square and community facility. This could potential include a musical venue, subject to an operator being secured to manage the space.	No change
5.5 South	BP5	Sam Balch	Strongly supportive of the West London Orbital and improving the immediate environment around Harlesden station. Should also focus on improving Acton Lane from Harlesden town centre to the station through public realm improvements and street tree planting. There should be more provision for cycle commuting into central London.	Support noted. Reference added to improving links from Harlesden Station to Harlesden Town Centre. The OPDC, as the local planning authority for Old Oak, are proposing to enhance cycle links along Scrubs Lane which will provide an improved connection between Harlesden and Central London.	Add to the homes section the potential to enhance the setting of Harlesden Station and its connectivity to the surrounding area and Harlesden Town Centre.
5.5 South	BP5	Jeremy Biggin	1. Increase cultural offer. 2. No further large scale supermarket. 3. Expand Wembley Eastern Lands boundary to centre of Second Way Road and reduce size of proposed Industrial Business	1. This place includes many cultural attractions. The vision for the place is to protect and enhance its heritage and cultural assets and this is reflected in	BP5 a) Amend to "Conserving and enhancing heritage and cultural assets and their setting, in particular that of

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			Park accordingly to the East. 4. Support tall buildings in central place: Heights seem relevant to the areas and will match with the consents already released.	policy BP5a. Policy BP5a to be amended to specifically reference cultural attractions. 2. New retail floorspace is primarily to be directed to Harlesden Town Centre. The Local Plan does not identify any sites in this Place for large scale supermarkets. 3. Amend Eastern boundary. Discuss. 4 Support for tall buildings in Central Place noted.	Neasden Temple and Harlesden Conservation Area."
5.5 South	BP5	Kevin Barry	More needs to be done to secure excellent facilities for secondary schools. Brent needs at least 3 top class secondary schools.	Modelling work has been undertaken with colleagues in Education to identify the number of schools which will be needed to inform future population growth. This identified in the medium term an additional secondary school will be needed, and the Chancel House site has been allocated for a secondary school. In the longer-term a sufficient places which equate to a further school will be needed and this is likely to be provided by the expansion of two or more secondary schools.	No change
5.5 South	BP5	Annika McQueen	Old Oak Lane should definitely be better linked with Harlesden as it is set apart from it currently. Church End needs to be a priority area as change is happening too slowly here. The area is desperate for investment, there is no large supermarket here to cater for local residents. Redevelopment of the market	Support for policy to improve links between Harlesden and Old Oak noted. The Plan identifies Church End as a Growth Area and identifies a number of sites for redevelopment. It is proposed low-density industrial sites with a poor environmental quality will be	No change

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			and Church End needs to happen at a faster pace as the low-quality environment really affects the quality of life of residents. Church End is in sore need of more employment opportunities, better-quality housing and environmental improvements.	redeveloped for housing and modern employment space. New community and cultural facilities are to be secured including a new secondary school, health, employment and community hub. A town centre manager has recently been appointed for Church End that will take forward short to medium term enhancements, in advance of sites being delivered.	
5.5 South	BP5	OPDC	Part w) could also refer to improving links into Park Royal industrial area	Agreed. See amendment.	Update w) to: Create strong links between Harlesden Town Centre and Old Oak via Willesden Junction, and from Harlesden and Stonebridge to Park Royal, through wayfinding and public realm improvements.
5.5 South	BP5	Department for Education	Support the allocation of the Chancel House site for a secondary school. Proposing a 1,150 pupil (6 forms of entry) secondary school with 250 pupils 6th form on this site. The school will help to address an existing shortage of secondary school places in the borough.	Support noted.	No change
5.5 South	BP5	Rita Valentini	Church End needs to be better maintained. It lacks a gym and supermarket.	The council has as pointed a Town Centre Manager for Church End and an Area Manager who are taking co-ordinated action on	No change

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				<p>maintenance, fly tipping and littering. Opportunities to improve shopfronts in Church End local centre are also being explored. The redevelopment of sites within Church End present an opportunity to improve the quality of the appearance of the area and to secure new retail and leisure facilities as well as housing and employment. A permission for a gym has been granted for the ground floor of Hornby and Davies Courts, although as yet no occupier as come forward.</p>	
5.5 South	BP5	Wembley Towers Limited (owners of Wembley Point and surrounding land)	<p>Support the wording of the Preferred Policy Option BP5 South and the reference to the requirement to provide a dense development pattern (whilst positively responding to the predominantly low-rise character of the area). Support approach for 'some taller buildings near Wembley Point to mediate between Wembley Point and surrounding low-rise. The height of the building should be dependent on design quality, technical considerations and local context, albeit the site, alongside Argenta House is of sufficient size to create its own character and sense of place, whilst ensuring that the adjacent hinterland is successfully mediated with appropriate scaling and location of buildings.</p>	Support noted.	No change

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5.5 South	BP5	Stonebridge Real Estate Development Ltd (Unisys site owner)	We support the wording of the Preferred Policy Option BP5 South and especially note the reference to the requirement to provide a dense development pattern (whilst positively responding to the predominantly low-rise character of the area). The opportunity for taller buildings on the Unisys site should be referred to.	Support noted. Policy refers to the 'opportunity for taller buildings near Wembley point.' This encompasses areas of the Unisys & Bridge Park site near to Wembley Point. Further clarification is included in the site allocation and tall buildings study.	No change
5.5 South	BP5	Caroline Bottoms	Welcome the focus on Church End as an area with potential for holistic growth. Need to work with local communities to develop plans which serve their needs as well as contributing to the wider borough priorities. Sites on Willesden High Road and Dudden Hill Lane area should be looked at jointly. All the sites back onto low level traditional terraced housing, which suggests low level development. There are some interesting and valuable historical buildings, particularly the (current) Seventh Day Adventist church, which should be retained. The long-empty Crown Public House on Willesden High Road could usefully be incorporated into the plans for the bus depot site. No mention is made of the semi derelict allotments on Tower Road behind the Brahma Kumaris building, which could be better utilised	Support for proposals for Church End noted. It is envisaged a detailed masterplan would be developed for Church End Growth Area to take the site allocations forward. This would be subject to community engagement and consider all sites collectively. The areas heritage assets are noted and protected in both the place policy and related site allocations. Agreed Crown Public House should be considered as part of site allocation and the allocation has been amended accordingly. The allotments are in use and are to remain as allotments to meet identified demand.	Existing Use: Transport for London Bus Depot and vacant public house. Allocated use: Re-provision of bus depot and public house or employment uses with residential above.
5.5 South	5.5.18	Jonathan Whiskered	Supportive of the initiative to boost Harlesden's retail offer, night time economy and promote it as a Creative Enterprise Zone.	Support noted.	No change

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5.5 South	BSSA1	Kelaty Properties LLP	<p>1. The Cygnus Business Centre is a Locally Significant Industrial Site and would be subject to London Plan Policy E7 and Local Plan Policy BE2. In contrast, for non-designated industrial sites (such as Asiatic Carpets), industrial, storage or distribution floorspace is to be provided as part of mixed-use intensification only where this is feasible. Policy BE2 would not be applicable at all to Asiatic Carpets. 2. The Cygnus Business Park is not in single ownership, there are understood to be a number of long-term tenancies and part of the site is now in residential use. This is recognised as a risk to comprehensive development. Given this context, we consider it inappropriate to combine the two sites into one allocation. 3. The Indicative Capacity identified for the combined Asiatic Carpets and Cygnus Business Centre sites is just 223 residential units. It is considered to significantly underestimate the opportunity offered by the Asiatic Carpet site. Kelaty Properties LLP has begun to look at how their site could be optimised for housing, whilst also delivering flexible, modern employment floorspace. The Site Assessment submitted with these representations demonstrates that the site has capacity to deliver at least 600 units.</p>	<p>1. London Plan policy E7 also applies to non-designated industrial sites. It allows for mixed-use development through an allocation in an adopted local development plan document. Given Brent's status as a borough which is to provide capacity an increase in industrial floorspace will be sought. See correction which includes reference to Local Plan policy BE3 which applies to non-designated industrial sites. 2. Noted. See amended text to allow development to come forward in separate phases. 3. The sites capacity is constrained by the need to reprovide and increase the quantum of industrial floorspace. The site assessment submitted would not meet the requirements of policy E7 and BE3. Furthermore, it would not meet London Plan and Local Plan design standards in terms of dual aspect and proximity to adjoining development.</p>	<p>Redevelopment will be consistent with London Plan policy E7 and Brent Local Plan policy BE2 and BE3. Given the land ownership there is potential for the Asiatic Carpets site to come forward as a first phase. This would be subject to it being demonstrated it would not prejudice the delivery of a comprehensive masterplan for the site allocation or the operation of Cygnus Business Park. It would need to be demonstrated the Asiatic Carpets site in isolation would meet policy requirements, including an increase in industrial floorspace.</p>

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5.5 South	BSSA1	Historic England	The south west corner of the site lies within an Area of Archaeological Interest. Any proposals at this location should be accompanied by the appropriate assessments in order to identify the archaeological potential and the significance of the likely archaeological impact.	Reference to be added to policy under planning considerations.	Planning Consideration: The south west corner of the site lies within an Area of Archaeological Interest. Any proposals at this location should be accompanied by the appropriate assessments in order to identify the archaeological potential and the significance of the likely archaeological impact.
5.5 South	BSSA1	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process.

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5.5 South	BSSA1-3	Rita Valentini	The industrial sites are poorly maintained and look neglected.	Noted. Redevelopment will provide environmental improvements.	No change
5.5 South	BSSA2	Historic England	The north west corner of the site lies within an Area of Archaeological Interest. Any proposals at this location should be accompanied by the appropriate assessments in order to identify the archaeological potential and the significance of the likely archaeological impact.	Reference to be added to policy under planning considerations.	Planning Considerations: The north west corner of the site lies within an Area of Archaeological Interest. Any proposals at this location should be accompanied by the appropriate assessments in order to identify the archaeological potential and the significance of the likely archaeological impact.
5.5 South	BSSA2	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with

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					Thames Water early on in the planning process.
5.5. South	BSSA3	Savills on behalf of Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited with an interest in Chapmans Park Industrial Estate	<p>Note the retention of the area as LSIS and support the site principle of the site allocation.</p> <p>The site contain contains no designated heritage assets, is close to facilities and social infrastructure and public transport connections with a good level of public transport accessibility. The provision of dwellings will assist in meeting the London Plan housing target. The indicative capacity of 200 dwellings for the site would result in an inefficient use of land. Taking account off current London Plan density assumptions the site could accommodate around 300 dwellings. The provision of any supporting community facilities should only be required if there is an identified need within the local area taking into account other sites with and facilities delivered in the future. The allocation wording should reflect this.</p>	<p>The indicative amount of residential development has been identified at an amount which at this stage in the absence of a fully designed scheme it is considered can realistically delivered on site. This takes into account the need to re-provide/ intensify industrial premises and potentially social infrastructure. It is proposed to make it clear that the indicative housing figures identified within allocations should neither be regarded as a minimum, which would take priority over other Local Plan policies, or a maximum which should limit numbers even if design solutions/ an otherwise acceptable scheme could deliver a higher number of dwellings.</p> <p>In relation to social infrastructure needs on site, the council is</p>	The Local Plan has been amended to make it clear that the indicative housing amounts identified in allocations should neither be seen as a maximum to artificially limit dwelling numbers if an otherwise policy compliant development can be delivered or a minimum that would over-ride other policy considerations if it was clear that in delivered the indicative amount an unacceptable development would otherwise be delivered.

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				aware for the need to reasonably relate these to the impacts of additional development.	
5.5 South	BSSA3	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process.

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5.5 South	BSSA4	Roccopia Investments Ltd	280A Willesden High Road has received planning permission (Ref:15/1555) for three new residential dwellings. Financial contributions towards the provision of a new public play area and open space improvements off-site would be more appropriate than on-site provision due to the proximity of the road and maintenance issues.	Noted. To save room in the document, due to the small number of dwellings identified the allocation will now be identified in the list of additional allocation sites.	Remove detailed site allocation and add to list of other allocation sites.
5.5 South	BSSA4	Roccopia Investments Ltd	Assuming LBB formally enter into a Joint Venture (JV) with Roccopia Investments to deliver a mixed use development on the site, the development is expected to come forward within the 0-5years timeframe, rather than the 5-10 year timeframe stated within the draft allocation.	A Joint Venture is not agreed. However, following discussions with colleagues in property taking forward the site it is considered it could come forward in the 0 to 5-year period. To save room in the document, due to the small number of dwellings identified the allocation will now be identified in the list of additional allocation sites.	Remove detailed site allocation and add to list of other allocation sites.
5.5 South	BSSA4	Sport England	Welcomes the replacement of existing facilities as part of the site allocation. It is recommended that the allocation is clear that any replacement should be of at least, but preferably better, quantity, quality and accessibility than the existing facilities.	This site will be accommodating a larger community facility and as such will not now be able to re-provide play space on site. Improvements to an adjacent play space will be delivered in lieu. To save room in the document, due to the small number of dwellings identified the allocation will now be identified in the list of additional allocation sites.	Remove detailed site allocation and add to list of other allocation sites.

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5.5 South	BSSA4	Thames Water	Do not envisage water capacity issues for this site. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations. To save room in the document, due to the small number of dwellings identified the allocation will now be identified in the list of additional allocation sites.	Remove detailed site allocation and add to list of other allocation sites.
5.5 South	BSSA4	Roccopia Investments Ltd	Requested Amendments -1. update the existing use to reflect the residential use on the 290A Willesden High Road portion of the site. 2. Amend the Allocated Use to allow for housing, the re-provision of the community centre, allow for the potential of leisure or retail on the site and secure a financial contribution towards the provision of a new play area/open space improvements offsite. 3. Increase the quantum of units which can be delivered on the site to circa 50 units. 4. Amend the timeframe of delivery to 0-5 years. 5. Update the description to make it clear that there is no play equipment on the site and that the games court is redundant and permanently locked. The description must also include reference to the 290A Willesden High Road land parcel which has an implemented planning permission for 3 residential units. 6. Update to show both public and private ownership. 7. Update the	Whilst this information might be right, to save room in the document, due to the small number of dwellings identified the allocation will now be identified in the list of additional allocation sites.	Remove detailed site allocation and add to list of other allocation sites.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>Planning History Section to refer to 290A Willesden High Road which has an implemented planning permission (Ref:15/1555) for 3 residential units. 8. Amend the description to reflect the current allocation which seeks a contribution towards the provision of a new play area and open space improvements in the vicinity, rather than the provision of on-site facilities.</p>		
5.5 South	BSSA4	Roccopia Investments Ltd	<p>The current site allocation states financial contributions will be sought towards provision of a new play area and open space improvements in the vicinity, namely Learie Constantine Open Space on Villiers Road, and Willesden Communal Gardens, Dudden Hill Lane. The draft site allocation BSSA4 now incorporates the 290A Willesden Road land parcel, and implies the games court and former playground must be provided onsite. Considered unsuitable for play due to its proximity to a main intersection of a busy road. Concerns over on-going maintenance if facility is on-site. Reference to retail and leisure has now been removed. It is considered appropriate that the reference to retail/leisure uses on the ground floor remain as these may be needed to create an 'active frontage' on the ground floor as well as potentially helping to cross fund the delivery of the</p>	<p>The loss of the games court and playground will need to be mitigated, but is agreed this will be off-site through a compensatory games court and playground provision at Longstone Avenue Open Space. In terms of uses the priority is to reprovide the community centre and residential. The loss of the community centre would not be acceptable in planning terms. To reprovide the community space of sufficient size, in addition to servicing and amenity space for residents, the ground floor will be fully occupied by the community space. This is supported by the capacity study. Additional retail and leisure uses will therefore not be required to create active frontage. To mitigate for the loss of the former games court and</p>	<p>Remove detailed site allocation and add to list of other allocation sites.</p>

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			new community centre and the delivery of affordable housing within the scheme.	playground contributions will be required to provide compensatory games court and playground provision at Longstone Avenue Open Space. To save room in the document, due to the small number of dwellings identified the allocation will now be identified in the list of additional allocation sites.	
5.5 South	BSSA4	Roccopia Investments Ltd	The NPPF requires housing supply to be significantly boosted. LBB needs to facilitate a step change in housing need. The number of residential units which are indicated for the site in the draft allocation is 25, a small increase from the original quantum in the current allocation of 20. A capacity study has been provided indicating circa 49 units could be delivered on the site, alongside a new community centre.	The design in the capacity study provided would not meet policy requirements. The proposal is very close to the rear and side boundary and would impact negatively on the amenity of neighbouring properties. Development would need to be set back for consistency with the building line and to protect mature trees on the site. The majority of the flats are single aspect, which is likely to result in overheating in the summer for flats facing Dudden Hill Lane, whilst those to the rear will not receive sunlight. For this reason, London Plan policy requires dual aspect to be maximised and single aspect avoided. The design does not meet the local policy requirement for 25% family units. It is also not clear if Brent's amenity space standards have been met. It is considered 25 units is a more	Remove detailed site allocation and add to list of other allocation sites.

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				reasonable indicative capacity which would allow a scheme to be developed which met London Plan and local policy requirements. To save room in the document, due to the small number of dwellings identified the allocation will now be identified in the list of additional allocation sites.	
5.5 South	BSSA4	Roccopia Investments Ltd	290A Willesden High Road is owned by Roccopia Investments and received planning permission (Ref:15/1555) for three new residential dwellings. The permission has been implemented and the build process has commenced. The description of the 'Existing Use' therefore needs to be updated to reflect the residential use on this part of the site.	Noted. The site will be removed from the redline boundary. To save room in the document, due to the small number of dwellings identified the allocation will now be identified in the list of additional allocation sites.	Remove detailed site allocation and add to list of other allocation sites.
5.5 South	BSSA4	Roccopia Investments Ltd	The site only contains an existing community centre and a permanently locked and disused games Court. There is currently no play equipment on the site. There is also no reference in the description to the 290A Willesden High Road portion of the site. The Description of the site needs to be updated to reflect the current description of the entire site. The site is in both public and private ownership.	290A Willesden High Road to be removed from site boundary. To save room in the document, due to the small number of dwellings identified the allocation will now be identified in the list of additional allocation sites.	Remove detailed site allocation and add to list of other allocation sites.
5.5 South	BSSA5	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early	Noted. See text to be added to policy under infrastructure. London Plan policy requirements	Thames Water has indicated the water network capacity in this

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			engagement with Thames Water is needed. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process.
5.5 South	BSSA5	Greater London Authority (GLA)	As a 'provide capacity' borough Brent should be seeking opportunities through its site allocations to intensify industrial capacity to satisfy the identified need.	Draft policy BE3 requires an increase in employment floorspace on local employment sites, and this is reflected in the site allocation.	No change
5.5 South	BSSA6	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is

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					<p>brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p>
5.5 South	BSSA6	Greater London Authority (GLA)	<p>As a 'provide capacity' borough Brent should be seeking opportunities through its site allocations to intensify industrial capacity to satisfy the identified need.</p>	<p>Draft policy BE3 requires an increase in employment floorspace on local employment sites, and this is reflected in the site allocation. Further clarification added to supporting text of site allocation.</p>	<p>Planning considerations: Barry's Garage, which forms part of the site allocation, is a local employment site. The draft London Plan identifies Brent as a 'provide capacity' borough and as such an increase in employment floorspace will be sought as part of any redevelopment.</p>

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5.5 South	BSSA7	Thames Water	Do not envisage water capacity issues for this site. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change
5.5 South	BSSA8	Thames Water	Do not envisage water capacity issues for this site. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change
5.5 South	BSSA8	Environment Agency	Argenta House and Wembley Point as allocated are still partly located in functional floodplain and should still be treated and assessed as such within the plan.	Site allocation to be amended to fully reflect recommendations in SFRA Level 2.	Add to BSSA8: Wembley Brook and River Brent are potential sources of flooding and the majority of the site is within Flood Zone 3. Part of the site is within flood zone 3b (functional floodplain). Development, other than water compatible uses, will not be acceptable within functional floodplain. More vulnerable uses should be restricted to areas of lowest flood risk and on upper floors. Ground floors should be designed to be resistant and resilient to flood risk. Basement dwellings will

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					not be acceptable on the site.
5.5 South	BSSA8	Wembley Towers Limited (owners of Wembley Point and surrounding land)	<p>1. The continued site allocation is welcomed. 2. It is noted that the site is referred to as being in light industrial use. It is recommended that this use and the requirement to reprovide employment space is solely attached to Argenta House. 3. There should be a mixture of appropriate uses, that are likely to be on the ground floor due to flood risk and the need to activate the site and draw people through as a permeable route from Harrow Road to the station. 4. This area is identified as suitable for a 'tall building'. Support this but consider the site could support a number of taller buildings. 5. Reference should be made to the opportunity for this site to be car free given its PTAL rating of 4. The Wembley Point scheme has recently received Prior Approval (18/3125) for 439 units based on a car free scheme without an existing CPZ. Need to confirm the position on the provision of disabled car parking spaces. 5. The indicative capacity for new housing should be updated to reflect the recent submission of Argenta House and to acknowledge the potential capacity for a future masterplan scheme of the remainder of the Site Allocation. As such a quantum between c. 500 – 700 should be referred to.</p>	<p>1. Noted. 2. The extent of the functional floodplain limits the developable area of the site. There site is therefore considered as one site to encourage a more comprehensive redevelopment which maximises the land available. The draft London Plan identifies Brent as a borough to provide employment floorspace capacity. As such Local Plan policy and the site allocation requires employment uses to be reprovided and employment floorspace increased. The policy requirements, including to provide affordable workspace, applies across the site. Should Argenta House come forward as one scheme it would need to be demonstrated the site can meet this policy requirement in isolation. 3. The site is in close proximity to a neighbourhood parade with a range of retail and other commercial uses. Policy amended to state small scale retail may be appropriate where it protects the vitality and viability of the parade. Community and cultural uses to serve the new community would be supported. 4. Text to be amended to include</p>	<p>Planning considerations: Car free development will be encouraged, subject to a Controlled Parking Zone being achieved. The site is adjacent an existing local shopping parade at Harrow Road. Small scale complementary retail uses may be appropriate providing they support the vitality and viability of the existing parade. Community and cultural uses will be needed to serve the new community and promote social interaction. Justification: The indicative capacity takes into account that the majority of the site is within functional floodplain and therefore not suitable for development. Should flood risk modelling approved by the Environment Agency result in changes to the extent of the functional floodplain, a higher level of development may be achievable. The design principles and policy</p>

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				<p>reference to car free development. Car free development will be subject to a CPZ, in line with current and emerging policy. Prior approvals are not subject to the same policy requirements as planning applications, but should an application come forward a CPZ would be required to mitigate impacts of development on the surrounding road network. Policy on disability parking standards is set out in the transport chapter and accompanying appendix, rather than repeated in each site allocation. 5. The indicative capacity takes into account that the majority of the site is within functional floodplain and therefore not suitable for development. Text has been added to acknowledge should flood risk modelling approved by the Environment Agency result in changes to the extent of the functional floodplain, a higher level of development may be achievable.</p>	<p>considerations would still apply in such circumstances.</p>
5.5 South	BSSA8	Greater London Authority (GLA)	<p>As a 'provide capacity' borough Brent should be seeking opportunities through its site allocations to intensify industrial capacity to satisfy the identified need.</p>	<p>Draft policy BE3 requires an increase in employment floorspace on local employment sites, and this is reflected in the site allocation. Further clarification added to supporting text of site allocation.</p>	<p>Justification: Consistent with this Brent's Local Plan policies allow redevelopment of Local Employment Sites such as Argenta House, subject to reprovision of employment</p>

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					floorspace as affordable workspace. An increase in employment floorspace will be sought.
5.5 South	BSSA9	Sport England	The Unisys and Bridge Park site allocation should refer to the Indoor Sports and Leisure Needs Assessment so developers are clear what facilities should be provided within the new leisure centre. Should specify residential uses should not be in close proximity to the leisure centre.	Specific reference to be added to supporting Indoor Sports and Leisure Needs Assessment under planning considerations. Any application will be assessed against policy DMP 1 which ensures impacts on amenity are assessed and mitigated as appropriate.	Planning considerations: The provision of a new leisure centre on the site is required to meet the need for indoor sports facilities in the borough, as set out in the Brent Indoor Sports and Leisure Needs Assessment.
5.5 South	BSSA9	Penny Bishop	Support Unisys coming forward and Wembley point.	Support noted.	No change
5.5 South	BSSA9	Stonebridge Real Estate Development Ltd (Unisys site owner)	Support the allocated future uses for Bridge Park and Unisys, although it should be recognised that other active ground floor ancillary floorspace may be necessary to assist with the permeability and activity of the overall development, to include: A1, A2, A3, A4, D1 and D2. The suitability of the site for visitor accommodation has been justified and accepted through the existing allocation and pre-application discussions. There should be reference to the requirement to minimise car parking quantum.	The site allocation includes a hotel. Amendment proposed to include reference to small scale commercial and community uses and car free development.	Allocated use: New leisure centre, hotel, office, residential and small scale commercial and community uses. Planning considerations: Small scale commercial and community uses will be acceptable where they meet the needs of the new community. Car free development will be encouraged, subject to a Controlled Parking Zone being achieved.
5.5 South	BSSA9	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply	Thames Water has indicated the scale of development is likely to require upgrades to the

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			Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	to all major developments. Flood risk issues are highlighted under planning considerations.	wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.5 South	BSSA10	Thames Water	The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.
5.5 South	BSSA12	Sport England	Object if redevelopment of Learie Constantine Centre will result in loss of sports facilities.	The Learie Constantine Centre is a community centre. Any sporting use is informal as part of this function. The policy specifies the community centre is to be reprovided as part of any redevelopment, so there will be no loss of provision. It will be better designed to accommodate a wider range of potential uses, thus being more relevant to the local community.	No change

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5.5 South	BSSA17	Historic England	The presence of the adjacent Grade II* Church of All Souls and the Harlesden conservation area should be clearly indicated, and the assessment of any effects on their significance should be required. Reference to the existing Conservation Area Character Appraisal should also be made.	Additional text to be added to site allocation as requested.	Additional text added to policy BSSA17 This site is immediately adjacent to the Grade II* Church of All Souls and the Harlesden conservation area. The presence of these heritage assets should be clearly indicated and the assessment of any effects on their significance (including on their setting) will be required. The Harlesden Conservation Area Character Appraisal provides further information on these heritage assets.
5.5 South	BSSA18	Penny Bishop	Craven Park Roundabout a difficult housing site due to crossing and air quality concerns.	This site is not allocated, but in any case is subject to a planning application and as essentially an under-used urban site could be developed in a more efficient manner.	No change
5.5 South	BSSA19	N Kusneraitis	A new secondary school should only be built if there is space for sports as well as classrooms, and if it will not impact on demand for other schools.	Work undertaken by the council demonstrates in addition to existing provision a new secondary school is needed to meet demand. Schools are required to meet specific standards set by the Department for Education, including suitable sports and recreational provision.	No change

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5.5 South		John Cox	An additional 'Church End' railway station on the West London Orbital line is needed on the south side of the Taylor's Lane road bridge, next to the power station. The station would increase the PTAL of the local area and would allow a new wide boulevard for pedestrians and cyclists to be built from the station to Brentfield Road, with a possible land swap by a local landowner in order to sacrifice some of the current allotments. That would also allow no-car development along the boulevard and nearby, including new housing. The unloved neighbouring canal feeder stream could be opened up and naturalised. Brentfield Road would need a cosmetic and safety makeover at the road crossing where the boulevard reached it.	A feasibility study will identify and determine optimum stations on the WLO to provide a quality service. The current business case does not identify stations in the borough other than Harlesden and Neasden. Once the line is commenced there might be opportunities to consider additional stations however this will not be the case before a decision is taken on whether to proceed with the project. Nevertheless, this feedback has been shared with council officers involved in taking WLO forward alongside TfL and the other West London Boroughs forming the West London Alliance.	No change
5.5 South		John Cox	Great Central Way is a hostile and boring stretch of roadway for motorists, pedestrians and cyclists. It needs to be given some character. Suggest this could be achieved through artwork as part of Brent 2020. Pedestrian connections up to the North Circular Road need to be dramatically improved and the approach roads to Neasden Lane and Great Central Way underpasses enhanced so there is a sense of place.	Limited potential to enhance without comprehensive development coming forward. Opportunities for street tree planning and soft landscaping have been identified.	No change
5.5 South		John Cox	A north-bound bus lane should be provided on Brentfield Road, which	Does not require a local plan policy for the bus lane as this	No change

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			would transform bus journeys, and encourage modal shift from cars. An intensification corridor is needed on the eastern side of Brentfield Road, to provide a proper street frontage. More off-street parking for the residents and visitors of the housing on the western side near the North Circular Road is needed.	could be taken forward as a highways scheme. Comment shared with colleagues in transport for consideration. Although agree the street frontage on Brentfield Road is in need of improvement it does not meet the criteria for designation as an intensification corridor due to its low PTAL.	
5.5 South		Penny Bishop	A large community space is needed in Harlesden.	The emerging Harlesden Neighbourhood Plan includes policy to secure a new community space through the redevelopment of Harlesden Plaza. This policy is cross-referenced in the Local Plan.	No change
5.5 South		OPDC	The OPDC's Local Plan seeks to ensure new development incorporates existing businesses where possible.	Noted.	No change
5.5 South			Agree with locations identified for tall buildings. Affordable housing is desperately needed.	Noted.	No change
5.5 South		Harish Dabasia, Sagoon Patel	The BAPS Swaminarayan Mandir (Neasden Temple) visitors comprise religious devotees (about four and half million a year) and tourists and school children (also one and half million a year). We therefore greatly contribute to the religious, social and economic life of the borough of Brent. However, poor transport links are preventing the temple's expansion to further serve the community. Neasden station is	Opportunity to enhance links and make better use of land noted. A feasibility study will identify and determine optimum stations on the WLO to provide a quality service. Feedback shared with council officers involved in taking WLO forward alongside TfL and the other West London Boroughs forming the West London Alliance. At present the focus for	No change

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			<p>accessed by an alleyway and foot bridge which are hotspots for anti-social behaviour. Stone Bridge and Neasden Station has no straight bus service to the temple. Harlesden station is too far to walk from for the elderly and school children. Congestion relief is needed on Brentfield Road, Meadow Garth and Conduit Way. Land owned around the Temple could be put to much better use than as giant car parks. The Plan should also support an extra West London Orbital station at Taylor's Lane. There is an opportunity to convert the narrow footpath from Taylor's Lane to the Temple into an attractive pedestrian and cycling boulevard to facilitate car free development, including spiritual, arts and crafts centres, community hubs, gardens, small businesses and housing.</p>	<p>the business case and initial development of the line is on stations at Harlesden and Neasden.</p>	
5.5 South		IKEA (IKEA Properties Investments Ltd)	<p>The Draft Plan proposes to include the IKEA store within the Wembley Strategic Industrial Location. Its designation is not justified.</p>	<p>The Ikea store is within Wembley SIL. This designation is included in the current Core Strategy (2010) and pre-dates the draft Local Plan. Given the London Plan requirement for Brent to provide capacity in industrial floorspace it is not proposed to release any further SIL.</p>	No change
5.5 South		John Cox	<p>The environs of Harlesden station need to be classified as an intensification corridor.</p>	<p>The environs of Harlesden Station are site allocations and therefore have not also been identified as intensification corridors which are subject to a more generic policy.</p>	No change

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5.5 South		John Cox	The North Circular Road causes severance between the station and 1930s shopping parades to the north and residents to the south. Crossing the A406-A404 Harrow Road junction on foot or cycle is unpleasant because of the noise and air quality of the six-lane North Circular below. Sound baffles are needed on the bridge. The current large shrubs at the junction create a hostile environment, even if they absorb pollution and a little of the noise.	Policy BT1 sets strategic priority to improve environmental quality on the North Circular. This will be amended to include the need to reduce severance both on the North Circular and London Distributor Road network. CFR23 will provide improved cycling and walking infrastructure to encourage modal shift away from the car and assist in improving air quality, from Wembley through to Willesden Junction via Bridge Park.	e) improve environmental quality and reduce severance along the North Circular and London Distributor Road Network; 6.8.14 Environmental improvements and opportunities to reduce severance, for example by enhancements to underpasses and crossing points, will be sought.
5.5 South		John Cox	The scale of the A404 intensification corridor demands that routes to Stonebridge Park station on foot and cycle are improved. Like Harlesden Station Stonebridge Park Station lacks a sense of arrival.	Agreed that the route needs improvement and that the setting of Stonebridge Park station should be enhanced.	BP5 u Enhance the setting of Harlesden and Stonebridge Park Stations and their connectivity to the surrounding area and Harlesden town centre through wayfinding and public realm enhancements.
5.5 South		Elana Gal-Edd	Objects to Deacon and Chaplin Road within Willesden Green Ward being split between the South and South East places. Concerned will impact on community. Objects to the designation of the western end of Willesden High Road and start of Dudden Hill Lane as an intensification corridor, where buildings of up to 6 storeys might be allowed. This section of the high road consists predominantly of period terraces, some	The place boundaries are informed by town centre catchments, and solely for the purposes of the Local Plan only. They will not impact on the way services are delivered and planning applications will be considered taking into account the wider area regardless of boundaries. Five storeys have been identified as appropriate for	Clarify five storeys appropriate in intensification corridors.

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			<p>with very attractive gables, much like the sections of the High Road designated as a conservation area. This area could be an independent shopping area. The construction of the Angel Court mansion block on the junction of Willesden High Road and Dudden Hill Lane in recent years has added nothing to the prosperity and vitality of the area. Improvement of this area can only be achieved by respecting and enhancing its existing character, by smartening up the existing buildings and shops and thus creating a sense of pride and respect for one's environment. Consider extending the conservation area to the entire Willesden High Road.</p>	<p>intensification corridors, and height will be subject to consideration of the wider context. The town centre health checks have identified the west end of Willesden Green High Road experiences high levels of vacancy, when compared to the core of the high street. It also has a poorer quality environment. This is why it has been identified as an area for intervention. The entire length of Willesden High Road is not considered to have enough architectural and historic merit to designate the whole length. It would also dilute the high quality of the existing Willesden Green Conservation Area. However, there are some buildings and groups of buildings which do have architectural interest that may warrant protection and it is proposed to consider these alongside the current proposals for the Willesden Green Conservation Area extensions and local list thematic review.</p>	

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5.5 South		Wembley Towers Limited (owners of Wembley Point and surrounding land)	There are a number of sites within close proximity to Stonebridge Park station which have the scope to make a dramatic transformative change to the townscape and via optimised housing delivery through providing taller buildings, particularly to offset the negative impact of the North Circular and to respond to the strong urban frontage.	Agree redevelopment of these sites has potential to improve townscape and the site allocations include guidance to ensure high quality design and appropriate heights.	No change

SOUTH EAST

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.6 South East	5.6.2	Queen's Park Area Residents Association	Reference the historically important Queens Park with its 33-acre park created in 1887 a continuing source of activity and local resource to this day. One of the 8 Conservation Areas referred to in the south east. It has featured multiple times as a film location.	Reference to Queen's Park added to paragraph 5.6.3.	5.6.3 Queen's Park opened by the Lord Mayor of London in 1887;
5.6 South East	5.6.3	Kilburn Neighbourhood Forum	Worth including that Kilburn has had 6 cinemas in its history and entertainment is part of its legacy.	Reference included to Gaumont State Cinema one of the largest cinemas in Europe when first built.	No change
5.6 South East	5.6.4	Kilburn Neighbourhood Forum	Paragraph 5.6.4 add 'as well as music, performance and entertainment venues mainly in the its many remaining pubs.'	See proposed amendment.	5.6.4 Kilburn High Road has a lively night time offer including performance and entertainment venues in its pubs, restaurants and the Kiln Theatre and cinema.
5.6 South East	5.6.6	Queen's Park Area Residents Association	Where is this QP Creative Quarter? We have creative businesses all around our area.	Will clarify in supporting text location of Creative Quarters.	5.6.24 The Brent Workspace study identified existing clusters of creative industries in Queen's Park Design District focused along Lonsdale Road and Queen's Park Town Centre, Kilburn and Willesden Green High Road, and an unmet demand for incubators, accelerators and co-working space.
5.6 South East	5.6.10		Add to 5.6.10 '...and reduce carbon emissions and pollution by introducing	Points on tree planting, air quality and footfall are covered in	No change

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			cleaner buses and vehicles, planting more trees thus making the road healthier, safer and gaining more footfall.....'	paragraph 5.6.27. The Local Plan promotes cleaner vehicles by requiring electric charging points to be delivered as part of development. The roll out of electric buses and Ultra-Low Emission Zone (ULEZ) is being taken forward by the Mayor. The ULEZ will expand up to the North Circular from October 2021.	
5.6 South East	5.6.10	Kilburn Neighbourhood Forum	While it is expected that traffic will continue to be a major function of the A5 as this is a major highway into London, there should be an investigation into the newest scientific and technological developments to enhance the environment, remove pollution and reduce carbon emissions. This could include cleaner buses and vehicles, planting more trees and air purifying plants.	Noted. Policy BP6 w commits the council to reducing traffic dominance and enhancing the A5 corridor through public realm improvements to healthy street standards. We will continue to work with TfL and Camden Council to enhance this route.	No change
5.6 South East	BP6	Cirlini Dominique	Agree the west of Willesden Green has a low quality environment. The area feels unsafe, experiences crime and more street lighting is needed.	Noted. Comments on street lighting will be shared with colleagues in Highways.	No change
5.6 South East	BP6	Luca Taschini	Disagree with identifying Willesden Lane and Dudden Hill as intensification corridors. New building height should be capped to a maximum of 5 storeys high. Intensification on Willesden Lane should be focused on residential use only, while the Dudden Hill corridor should include retail.	It is proposed building heights along intensification corridors are subject to local context, but around 5 storeys. Appropriate uses will be determined based on character, demand and impact on vitality of nearby town centres.	No change

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5.6 South East	BP6	Neera Hirani	Disagree with identifying Willesden Lane and Dudden Hill as intensification corridors. New buildings height should be capped to a maximum of 5 storeys high. Building intensification in Willesden Lane should be focused on residential use only, while the Dudden Hill corridor should include retail. Previous examples of High Rise blocks are problematic, out of character with the area and result in under used open space.	It is proposed building heights along intensification corridors are subject to local context, but around 5 storeys. Appropriate uses will be determined based on character, demand and impact on vitality of nearby town centres. The scale of buildings in certain locations is identified in the Plan and development would need to take account of local character. Open space will be designed in the schemes to promote ownership/ use.	No change
5.6 South East	BP6	John Cox	Add to BP6 specific reference to a station at Gladstone Park and improved pedestrian and cycle routes.	A feasibility study will identify and determine optimum stations on the WLO to provide a quality service. Feedback shared with council officers involved in taking WLO forward alongside TfL and the other West London Boroughs forming the West London Alliance.	No change
5.6 South East	BP6	Emma Herbert	Co-owns property on Malvern Road, and a resident between 2004-2013 with hopes to return. Fully supports plan for Malvern Road covered in the Brent Historic Environment Place Making Strategy Appendix.	Support noted.	No change
5.6 South East	BP6	Kilburn Neighbourhood Forum	Wayfaring boards should be provided to display Kilburn's many assets and promote it as a destination. This is will increase the footfall along the High Road and the vitality of the town centre while also educating and	This does not require a local plan policy. Suggest the forum could pursue a bid for Neighbourhood Community Infrastructure Levy to deliver such boards. This is encompassed in policy BP6 a	No change

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			informing Londoners and other visitors. Conserve, maintain and enhance architectural features and facades along Kilburn High Road.	encompasses conserving and enhancing heritage assets, this includes designated and non-designated assets.	
5.6 South East	BP6	Elizabeth Lindsay	What form of housing is to be promoted? Why do we need more retail space if shops are closing? Walm Lane should be bus only. Widen footpaths and increase seating.	Across all major developments the council has a target of 50% affordable with a 70:30 social to intermediate split. Although shops in some edge of centre locations are closing the Brent Retail & Leisure Needs Study identifies we will need an increase in certain types of retail floorspace to meet the needs of the growing population (larger scale food shopping). Taking forward bus lanes is outside the scope of the Local Plan, but comment has been shared with colleagues in transport.	No change
5.6 South East	BP6	Lilly Aaron	Add support to the reopening of the Metropolitan line platforms at Willesden Green Station. This could be done at very little cost and would boost the viability of Willesden Green as a creative hub, better connecting it to creative networks in Farringdon and Liverpool Street. Support the further development of the Sainsbury's superstore and garages. Currently Willesden Green's convenience retail offer is limited. Due to the site's location as secondary frontage set back from the main road, it should be	The line is managed by TfL who determine the stopping service on a commercial basis. Willesden Green is 3 stops from Wembley and Finchley Road station, which are interchange stations on which you can transfer from the Metropolitan Line to Jubilee. Support for redevelopment of Sainsbury's site noted. See additional text added to Sainsbury's site allocation. Given the scale of the site and that no planning application has been	Design Principles: Public realm should be of a high quality and provide opportunities for interaction.

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			a prime location for active public realm and central green spaces. The timeframe for the first phase of this redevelopment should be moved forward in to the 1-5 year range to allow for appropriate proposals for public realm redevelopment that can attract the right occupiers and private investment. Encourage terraces and seating outside premises to animate the street better.	received at present, it is considered development is unlikely to come forward in years 1 to 5. Outdoor seating will be subject to the width of the pavement and need to keep a clear route for users including those with wheelchairs and prams.	
5.6 South East	BP6	David Walton	Five town centres should not be bundled into one place. States South Kilburn an opportunity to secure 7 pocket parks, but wider text is ambiguous. Chippenham Gardens Local Shopping Parade should be referenced in Local Plan.	A specific policy has been introduced for South Kilburn Growth Area which provides additional information on open space and local shopping parades.	see South Kilburn Growth Area policy
5.6 South East	BP6	Giuseppe Dimichino	Against further residential development in Dollis Hill and Willesden Green.	Under the National Planning Policy Framework Brent must seek to meet its Objectively Assessed Housing Need. If Brent fails to meet its need then the presumption in favour of sustainable development applies, whereby planning policies hold less weight. This could result in housing being granted on sites which would not usually be approved. It is therefore preferable to take a plan led approach to meeting housing need, considering all potential sites across the borough.	No change

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5.6 South East	BP6	Giacomo Vecia	There should be more thought given to how the A5 can be transformed into a street fit for the future of a thriving Brent, by removing parking spaces to increase pedestrian pavement widths, install cycle parking wherever possible, and plant more greenery, increasing crossing times, removing street clutter and improving drainage. The Community and Cultural Facilities section should consider including reference to improving support services to rough sleepers and the homeless.	Agreed. The A5 is to be designed to healthy streets standard. This standard encompasses the point outlined. The Local Plan has an important role to play in tackling homelessness by securing supported accommodation and affordable housing, and this is referenced in the Plan. The delivery of specific support services for rough sleepers is a function of the council, but one which falls outside of the Local Plan.	No change
5.6 South East	BP6	Kensal Rise Residents' Association	Further enhance independent retail offer at Kensal Rise. Kensal Rise town centre is characterised by more than the Lexi Cinema. Its restaurant and pub trades need acknowledgment and protection. Make the bus network more reliable and serve more customers by reviewing routing. Support enhancing cycle links from Kensal Rise.	Policy BP6 j references the importance of Kensal Rise's retail, restaurant and café offer. The council will continue to engage with TfL on improvements to the bus network.	No change
5.6 South East	BP6	Andrew Clayfield	1. Kilburn High Street is too car-oriented, with not enough space for pedestrians or pedestrian crossings, and is threatening to cyclists. Declutter and remove car parking along the high road other than for disabled people. 2. Sell new developments to those that work locally first. 3. Build above shopping centres, keep "utility" uses, e.g. offices, shops, community	1. Noted. The Local Plan seeks to promote walking and cycling over private vehicle use. It proposes traffic dominance is reduced along the A5 and the public realm is designed to healthy streets standard. 2. Those on the council's housing waiting list are prioritised for affordable housing. The council does not have the same controls	No change

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			centres, close together. 4. More leisure uses are needed on the High Road. 5. Improve the quality of the market. 6. The local energy system in South Kilburn has proven not to work. The cost and carbon involved in repair work offsets environmental improvement. Operation costs are high. 7. Explore opportunities to open up hidden waterways, to help reduce the heat-island effect.	over market housing. 3. The Plan allows for development above shopping centres, subject to a suitable level of amenity being achieved. Utility uses are to be concentrated in the town centre boundary, making them within walking distance. 4. The Local Plan allows leisure uses within the town centre. 5. The market is part of a site allocation which will deliver a new market and public square. 6. It's London Plan policy that local energy systems are required. 7. The Environment Agency are currently undertaking a project on hidden waterways in London. The project is at an early stage and there are no recommendations which could inform the Local Plan at present. It is anticipated that many of the hidden waterways were built over during the Victorian Era, therefore it may be challenging to open them up.	
5.6 South East	BP6	Elayne Coakes	Agree some shops could be converted to residential uses, provided that this is undertaken sympathetically and original features retained. The demolition of shop frontages within the Willesden High Road Conservation Area should be resisted. Vacancies are increasing on Walm Lane and the road leading the Library due to high	Noted. The Local Plan contains policies to protect historic shopfronts and to promote meanwhile uses. A successful meanwhile scheme has been operating from Queen's Parade.	No change

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			rents. The council should promote meanwhile uses.		
5.6 South East	BP6	Sonja Amoretti	The presentation of the document needs to be simpler, currently it favours professionals. Needs to identify which commercial uses will close and how the companies within them will be accommodated and that the space provided is affordable. This will otherwise result in gentrification.	The Plan has been made to be as simple as possible for the general public to understand, but also recognising the role that it has a technical document. There were easy read and summary documents to accompany the Plan to make it more easily understood/ accessible. The Plan is not promoting the closure of commercial uses, particularly within the Willesden Green area. It allows flexibility for use of premises that would otherwise be vacant, e.g. retail premises along the High Road towards Dudden Hill Lane for other uses, including creative industries. It seeks to support the provision of additional industrial/ employment space through where appropriate redevelopment of these existing premises. Without this there would in any case be a shortage of space as the population of London grows, which has and will push up rents. In certain circumstances the policies will require provision of affordable workspace.	No change
5.6 South East	BP6	Brigitte Chaudhry	1. People are unsure how they report problems in their local area to council. 2. Library in Kensal Rise too small. 3.	1. This depends on the nature of the problem. Issues related to maintenance and litter can be	No change

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			Avenue of trees in King Edwards park need assessing. 4. Why is there no development in Kensal Rise?	reported through the Cleaner Brent App. 2. Kensal Rise Library is a community run library, in addition to council led provision in the borough. 3. Comment will be shared with parks team. 4. Following a call for sites and further analysis no potential development sites were identified within Kensal Rise Town Centre.	
5.6 South East	BP6	Kilburn Neighbourhood Forum	Strongly support delivering tree planting and air purifying plants focussed along A5 and South Kilburn Growth Area. Could include reference to air purifying plants and Willesden Lane. In addition to healthy streets add enhanced resources for policing. To tackle the negative effects of traffic, the Forum proposes an investigation into the newest scientific and technological developments to enhance the environment and remove pollution, such as newly engineered materials.	The A5 is identified as a priority for tree planting due to its particularly poor air quality, being one of the main arterial routes into Central London. South Kilburn as a growth area has scope for tree planting as new developments come forward. Policing resources is outside the scope of the Local Plan. Proposal noted. The Plan is flexible enough to allow for the use of new technologies as they become available.	No change
5.6 South East	BP6	Nancy Platt	Support restaurant quarter around Kiln Theatre.	Support noted.	No change
5.6 South East	BP6	Queen's Park Area Residents Association	Tree planting/replacement to be delivered and maintained in conservation areas as they are integral to their character. Replacement of traditional pavement materials on a like-for-like basis should be the default, not cheap substitutes like tarmac. It dilutes the	The A5 is identified as a priority for tree planting due to its particularly poor air quality, being one of the main arterial routes into Central London. South Kilburn as a growth area has scope for tree planting as new developments come forward. QPARA could submit a bit for	No change

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			integrity of an area and must be resisted. North-south access routes such as Chamberlayne Road and Salisbury Road recognised as being congested and the source of poor air quality need to be improved.	Neighbourhood Community Infrastructure Levy funding for further tree planting in their area.	
5.6 South East	BP6	Elayne Coakes	The idea of co-working spaces should be encouraged as well as work-live accommodation. Retail premises could be knocked together to make them suitable for work spaces. Willesden Green would benefit from a market by the Library or in front of Sainsbury's. Had difficulty completing consultation form.	The draft Local Plan seeks to secure affordable workspace, including co-working space, through redevelopment of unviable retail units on the edges of town centres and where local employment sites come forward for redevelopment. Comment regarding market will be shared with Willesden Green Town Centre Manager. The site allocation has been amended as a result of another comment related to public realm improvements in front of Sainsbury's. Following feedback on the online consultation form was simplified during the consultation.	No change
5.6 South East	BP6	TfL Commercial Development	The wording at Part (c) of Policy BP6 is unclear in relation to the locations in which building heights of 5-6 storeys are considered appropriate. Wish to promote tall buildings within the South Kilburn Growth Area, which includes the allocated site BSESA34: Kilburn Park Underground Station, and for the criteria identifying areas suitable for tall buildings to include transport hubs	Wording of criteria C amended for clarity. The appropriateness of locations for tall buildings is informed by the Brent Tall Buildings Study, which is based on analysis of a number of factors including PTAL, local character, views and other sensitivities. See response to Kilburn Park	Amend BP6 to: c) Tall buildings will be appropriate in this place in South Kilburn Growth Area, where consistent with the South Kilburn Masterplan. In intensification corridors of A407 High Road and A4003 Willesden Lane denser

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			and areas of high transport accessibility where development densities may be optimised.	Underground Station site allocation.	development could be appropriate.
5.6 South East	BP6	Theatres Trust	We support part I. which promotes the creation of a food and drink cluster around the Kiln Theatre, with the presence of the theatre and cluster being mutually beneficial and likely to positively enhance the future vitality and viability of the designated Kilburn town centre.	Support noted.	No change
5.6 South East	BP6	Kishan Vekaria	Willesden Green lacks a central community place. The area in front of Sainsbury's should be improved and made greener to provide an informal meeting hub for the local community and a place where cultural events could happen.	Agreed. See additional text added to Sainsbury's site allocation.	Design Principles: Public realm should be of a high quality and provide opportunities for interaction.
5.6 South East	BP6	Kevin Barry	Willesden High Road needs investment. The photograph of the Royal Oak pub is in Harlesden not Willesden Green.	Agreed. A Town Centre Manager has been appointed for Willesden Green to take forward improvements. The Local Plan identifies sites within the high road for redevelopment to enhance the appearance of the area. Photographs in document to be amended.	Amend photographs to ensure correct images for each place.

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5.6 South East	5.6.11	Kilburn Neighbourhood Forum	Support the renewed market square, which will create an important focal point for the High Road. Consider Kilburn Town Centre to be for daytime shopping, with the 'evening economy' area around the Kiln/music/entertainment venues served by the Kilburn Jubilee line station - now with its night train service.	Noted	No change
5.6 South East	5.6.13	Queen's Park Area Residents Association	Important north-south routes in town centres on the edges of conservation areas. Tall developments must not be located where they could impact adversely on the adjoining conservation areas or local context.	Noted. Tall buildings zones are not identified as being appropriate in this place other than in South Kilburn, where consistent with the South Kilburn Masterplan.	No change
5.6 South East	5.6.21	Lionel Bender	The western section of Willesden Green Town Centre is a poor quality environment, with too many fast food shops, and small grocery shops all selling the same items. The area around Willesden Bus Garage is dismal.	Noted. The town centre boundary ends at Maybury Gardens, the retail premises beyond this are not within a defined town centre and therefore have the potential for greater diversification. The Local Plan includes policy to set a cap on the number of takeaways in each town centre. Willesden Bus garage is identified as a site allocation to promote investment.	No change
5.6 South East	5.6.24	Queen's Park Area Residents Association	Lonsdale Road is an important small business area as well as an eating location between two Conservation Areas. To protect its character and role for businesses could it be incorporated into the Queen's Park Conservation Area?	Merits of the proposed extension noted. Comment has been shared with the Conservation Officer. Amendment of conservation area boundaries is subject to a separate statutory process and there will be further public consultation on	No change

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				detailed proposals within the affected area.	
5.6 South East	BSESA1	David Walton	The red line cuts a tiny slither off the actual Austen House. Austen House contains 167 dwellings It's 16 not 18 storey. Infrastructure requirements should include nursery. Victorian Church retained with its setting enhanced.	Site boundary reflects a development plot which would allow dual aspect buildings and perimeter blocks. It is envisaged Austen and Dickens could be brought forward together, however, this aspect of the delivery strategy is subject to approval.	No change
5.6 South East	BSESA1	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.6 South East	BSESA2	Thames Water	Do not envisage water capacity issues for this site. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest

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			<p>with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.</p>		<p>opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p>
5.6 South East	BSESA3	Xavier Albinana	<p>Concern tall buildings at South Kilburn will result in overcrowding and a loss of light, privacy and views.</p>	<p>The council-led regeneration of South Kilburn Growth Area is a 15-year programme which is about half way through. The council's objective is to improve living conditions in South Kilburn by providing new facilities and high quality homes including 1,200 affordable homes for social rent for existing South Kilburn secure tenants, supported by homes for market sale. Development is needed to enable new high quality homes for social rent. All new development will be subject to national amenity standards, and Local Plan standards on amenity and views.</p>	<p>No change</p>

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5.6 South East	BSESA3	David Walton	Site allocation infrastructure requirement should include public open space and a new large community hall.	Inclusion of school in site allocation is an error. The new school is to be provided on Wordsworth House/Masefield House site. Site contained an office and hall for the South Kilburn Trust. South Kilburn Trust have relocated to a dedicated community hub provided at Carlton and Granville Centre. This is now temporarily occupied by a doctor's surgery, which will be relocated. A health centre is being provided at the Peel site as part of this development.	No change
5.6 South East	BSESA3	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of

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					damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.
5.6 South East	BSESA4	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. The site is only served by foul sewers.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. The site is only served by foul sewers. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.6 South East	BSESA5	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The scale	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this

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			of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. The site is only served by foul sewers.		development, and upgrades to the wastewater network are likely to be required. The site is only served by foul sewers. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.6 South East	BSESA6	David Walton	A 10 storey building adjacent Woodhouse Park will result in overshadowing.	The site currently contains a 12 storey building fronting Woodhouse Urban Park. Redevelopment of the site as a perimeter block will allow a slight reduction in height. Design principles for the site allocation requires heights to range from 4 to 10 storeys and maximise daylight and sunlight to the park.	No change
5.6 South East	BSESA6	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The scale of development/s is likely to require	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades

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			<p>upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.</p>		<p>to the wastewater network are likely to be required. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p>
5.6 South East	BSESA7	Thames Water	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and</p>	<p>Noted. See text to be added to policy under infrastructure.</p>	<p>Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. This site is very sensitive to foul water flows. Local upgrades to the existing water network</p>

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			<p>infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. This site is very sensitive to foul water flows. Early engagement with a detailed drainage strategy will be required.</p>		<p>infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree drainage strategy and a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p>
5.6 South East	BSESA8	Thames Water	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. The site is only served by foul sewers. Early engagement with Thames Water is needed. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.</p>	<p>Noted. See text to be added to policy under infrastructure.</p>	<p>Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. The site is only served by foul sewers. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity</p>

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					requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.
5.6 South East	BSESA9	Sport England	Although the allocation proposes open space, Sport England notes that there is a MUGA on the site. To ensure the allocation complies with national policy it should specify that the MUGA is retained, and preferably improved.	The MUGA forms part of the school and is currently not open to the public. The new open space will be informed by consultation with community on design, layout and format of play and sports provision. The MUGA would be reprovided as part of the school development. The Council's new policy requires schools to sign up to a Community Use Agreement which would allow community access to the facility.	Amend BSSE12 Planning Considerations to include: "The existing MUGA supplied at the Kilburn Park Junior School site will need to be provided. A community use agreement will be required to allow community access to this and other facilities within the school such as halls where it would not be unreasonable to assume that these facilities could be designed with wider community use in mind."
5.6 South East	BSESA9	David Walton	The existing school will be transferred to the Wordsworth House/Masefield House site which also incorporates some of the existing South Kilburn Open Space.	Noted.	No change
5.6 South East	BSESA9	Thames Water	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on	The space is to be open space therefore additional water supply and treatment will not be required.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			the water supply network and water treatment infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.		
5.6 South East	BSESA9	Greater London Authority (GLA)	Kilburn Park Junior School has been allocated for open space provision in what appears to be a land swap with Old Granville Open Space and Wordsworth, Masefield and part of South Kilburn Open Space. This would result in the net loss of 0.2ha, plus the loss from South Kilburn Open Space. In the absence of an up-to-date open space assessment it is not clear whether these sites are in an area deficient in access to open space and access to biodiversity. In accordance with Policy G4 of the Draft New London Plan, Brent should resist the loss of protected open spaces in areas of deficiency.	There will be no net loss of open space. The Kilburn Park Junior School will be relocated to Wordsworth House/Masefield House site, whilst the school site will become part of South Kilburn Open Space. This will create a more regular shaped open space that can be put to better use and feel more secure. Old Granville Open Space will be reprovided at equivalent quantity and higher quality as part of the Hereford Exeter site development. This has been clarified in text. Peel Precinct to be added to list of sites with planning permission for clarity.	BSESA9 Kilburn Park Junior School Area: 0.46ha Justification: The existing school will be transferred to the Wordsworth House/Masefield House site which also incorporates some of the existing South Kilburn Open Space. There will be no net loss of open space. Transfer of open space from this site to Wordsworth House/Masefield House site will be of significant benefit. It will create a more regular shaped open space that can be put to better use and feel more secure. It will raise the profile of the space in the public's consciousness and its impact on townscape by opening up views into the park when arriving from Queen's Park/Kilburn Lane. BSESA11 Old Granville Open Space. The site comprises open space. Compensatory open space of equivalent quantity and higher quality will

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					be provided as part of the Hereford Exeter site development.
5.6 South East	BSESA10	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.6 South East	BSESA11	Greater London Authority (GLA)	Kilburn Park Junior School has been allocated for open space provision in what appears to be a land swap with Old Granville Open Space and Wordsworth, Masefield and part of South Kilburn Open Space. This would result in the net loss of 0.2ha, plus the loss from South Kilburn Open Space. In the absence of an up-to-	There will be no net loss of open space. The Kilburn Park Junior School will be relocated to Wordsworth House/Masefield House site, whilst the school site will become part of South Kilburn Open Space. This will create a more regular shaped open space that can be put to better use and	BSESA9 Kilburn Park Junior School Area: 0.46ha Justification: The existing school will be transferred to the Wordsworth House/Masefield House site which also incorporates some of the existing South Kilburn Open Space. There will be no

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			<p>date open space assessment it is not clear whether these sites are in an area deficient in access to open space and access to biodiversity. In accordance with Policy G4 of the Draft New London Plan, Brent should resist the loss of protected open spaces in areas of deficiency.</p>	<p>feel more secure. Old Granville Open Space will be reprovided at equivalent quantity and higher quality as part of the Hereford Exeter site development. This has been clarified in text. Peel Precinct to be added to list of sites with planning permission for clarity.</p>	<p>net loss of open space. Transfer of open space from this site to Wordsworth House/Masefield House site will be of significant benefit. It will create a more regular shaped open space that can be put to better use and feel more secure. It will raise the profile of the space in the public's consciousness and its impact on townscape by opening up views into the park when arriving from Queen's Park/Kilburn Lane. BSESA11 Old Granville Open Space. The site comprises open space. Compensatory open space of equivalent quantity and higher quality will be provided as part of the Hereford Exeter site development.</p>
5.6 South East	BSESA11	Thames Water	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The</p>	<p>Noted. See text to be added to policy under infrastructure.</p>	<p>Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward.</p>

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			<p>surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.</p>		<p>Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p>
5.6 South East	BSESA12	Greater London Authority (GLA)	<p>Kilburn Park Junior School has been allocated for open space provision in what appears to be a land swap with Old Granville Open Space and Wordsworth, Masefield and part of South Kilburn Open Space. This would result in the net loss of 0.2ha, plus the loss from South Kilburn Open Space. In the absence of an up-to-date open space assessment it is not clear whether these sites are in an area deficient in access to open space and access to biodiversity. In accordance with Policy G4 of the Draft New London Plan, Brent should resist</p>	<p>There will be no net loss of open space. The Kilburn Park Junior School will be relocated to Wordsworth House/Masefield House site, whilst the school site will become part of South Kilburn Open Space. This will create a more regular shaped open space that can be put to better use and feel more secure. Old Granville Open Space will be reprovided at equivalent quantity and higher quality as part of the Hereford Exeter site development. This has been clarified in text. Peel Precinct</p>	<p>BSESA9 Kilburn Park Junior School Area: 0.46ha Justification: The existing school will be transferred to the Wordsworth House/Masefield House site which also incorporates some of the existing South Kilburn Open Space. There will be no net loss of open space. Transfer of open space from this site to Wordsworth House/Masefield House site will be of significant benefit. It will create a more regular shaped open space that can</p>

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			the loss of protected open spaces in areas of deficiency.	to be added to list of sites with planning permission for clarity.	be put to better use and feel more secure. It will raise the profile of the space in the public's consciousness and its impact on townscape by opening up views into the park when arriving from Queen's Park/Kilburn Lane. BSESA11 Old Granville Open Space. The site comprises open space. Compensatory open space of equivalent quantity and higher quality will be provided as part of the Hereford Exeter site development.
5.6 South East	BSESA12	Thames Water	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the water supply network and water treatment infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.	Noted. See text to be added to policy under infrastructure.	When further information on the scale of development is available Thames Water will need to be engaged to establish impact on water supply network and water treatment infrastructure. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.
5.6 South East	BSESA13	Thames Water	The water network capacity in this area may be unable to support the	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in

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			<p>demand anticipated from this development. Early engagement with Thames Water is needed. This site is only served by foul sewers and has limited access to the Ranelagh Trunk Sewer (in Kilburn Park Road). It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.</p>		<p>this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p>
5.6 South East	BSESA14	Thames Water	<p>The water network capacity in this area may be unable to support the demand anticipated from this development. The site is only served by foul sewers. Early engagement with Thames Water is needed. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer</p>	<p>Noted. See text to be added to policy under infrastructure.</p>	<p>Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Local upgrades to the existing water</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.</p>		<p>network infrastructure may be required to ensure sufficient capacity is brought forward. The site is only served by foul sewers. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p>
5.6 South East	BSESA15	Thames Water	<p>The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the water supply network and water treatment infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p>	<p>Noted. See text to be added to policy under infrastructure.</p>	<p>When further information on the scale of development is available Thames Water will need to be engaged to establish impact on water supply network and water treatment infrastructure.</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.6 South East	BSESA17	Alice Whitehead	Support improving Wickes site. Important it fits with character of the Broadway.	Noted.	No change
5.6 South East	BSESA17	Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Early engagement with Thames Water is needed. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction.	Noted. See text to be added to policy under infrastructure.	Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Thames Water will need to be engaged at the earliest opportunity to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.
5.6 South East	BSESA17	Beryl Dowsett	Wickes is the only reasonably accessible building supplies merchant in the locality and should be protected. Car parking is needed to take equipment home. The access to Cricklewood Retail Park from Cricklewood Broadway causes a lot of traffic from Oak Grove due to the traffic lights at the other side of the railway bridge.	The site allocation includes the reprovision of commercial floorspace. The current layout and road configuration makes poor use of the site. There is an opportunity to reprovide commercial floorspace, car parking and other uses through an improved layout and reconfiguration of the road layout. The traffic issues	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				highlighted will need to be addressed through the detailed design of the scheme, informed by a Transport Assessment.	
5.6 South East	BSESA17 & 18	London Borough of Barnet	Both these Brent sites are adjacent to Barnet's Brent Cross Cricklewood Growth Area. Any proposed development at the Cricklewood Broadway Retail Park must take into consideration the Cricklewood Railway Terraces conservation area which lies on the opposite side of the Edgware Road.	Noted. Reference added to site allocation BSESA17 under Planning Considerations.	Planning Considerations: This site is adjacent the Cricklewood Railway Terrace Conservation Area which lies on the opposite side of the Edgware Road in Barnet.
5.6 South East	BSESA18	Thames Water	Do not envisage water capacity issues for this site. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change
5.6 South East	BSESA18	Ravensale Ltd (majority landowner of site)	Ravensale Limited are the freehold owners of 249-289 Cricklewood Broadway, 30-56 and 60-74 Hassop Road. 1. The site is of little aesthetic value, comprising underutilised commercial uses, which detract from the local character. Recommend the site boundary is extended to include 30-56 and 60-74 Hassop Road as this site is under one ownership and would allow a comprehensive scheme to come forward. 2. We support the proposed allocated use as residential and commercial, but recommend that a hotel use is included as part of the	1. Boundary has been extended to include Hassop Road units. 2. Wembley and Kilburn as major centres are the priority for hotel development. Any proposal for a hotel development would be assessed against policy BE9 Visitor Accommodation and Attractions 3. Capacity has been amended to 40 dwellings based on a review of the site.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>mix of allocated uses. A hotel use would be wholly consistent with Chapter 7 of the NPPF and policy BE9 of the draft Local Plan, and contribute to the vitality of the town centre. 3. The attached Local Plan Capacity Analysis, demonstrates that the site is capable of accommodating a c.120 bed hotel in addition to c.80 residential dwellings. 3. The site allocation refers to the general character of the area being 2-3 storeys, whilst this may be correct, the emerging character of the area, particularly fronting Cricklewood Broadway, comprises buildings of up to 16 storeys. Based upon a site area of 0.6ha, an urban location and PTAL 5, the site could accommodate between 27 and 156 units. The median of this range equates to 91 units.</p>		
5.6 South East	BSESA18	Maree Shaw	<p>The redevelopment of the uncharacteristic building on Cricklewood Broadway is a good idea. Industrial businesses in Hassop Road are a continual problem for residents due to illegal dumping of industrial rubbish and runoff of chemicals into the drains. These business should be relocated away from a predominantly residential area.</p>	<p>Noted. Policy B6 (p) promotes the conversion of premises on Hassop Road to uses which improve amenity for neighbouring residential units. This will be cross-referenced in site allocation.</p>	<p>To the south the site is bounded by Hassop Road, which includes industrial businesses which are negatively impacting on the amenity of neighbouring residents. Policy B6 (p) promotes the conversion of premises on Hassop Road to employment uses which improve amenity for neighbouring residential units.</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.6 South East	BSESA18	Greater London Authority (GLA)	As a 'provide capacity' borough Brent should be seeking opportunities through its site allocations to intensify industrial capacity to satisfy the identified need.	Draft policy BE3 requires an increase in employment floorspace on local employment sites, and this is reflected in the site allocation.	Further clarification added to supporting text of site allocation.
5.6 South East	BSESA18	European Land and Property Ltd	1. Support the allocation but consider the site could support a greater scale of development. The site is located within a town centre; outside of a conservation area; along the A5 corridor; and opposite existing 5 storey buildings. For this reason, we consider the site is capable of accommodating a development of up to 5-6 storeys in height. 2. Recommend that the Site Allocation is extended to include the garages/workshops located to the south west of Hassop Road. These Class B2 uses (which are predominantly used as vehicle repair workshops) would potentially harm the redevelopment potential of the site.	1. 2. Site boundary has been amended to include Hassop Road.	No change
5.6 South East	BSESA19	Kilburn Neighbourhood Forum	Support policy for Gaumont Cinema building to be in community use. Willesden Lane wing could be better used and building needs maintenance.	Support noted.	No change
5.6 South East	BSESA19	Theatres Trust	The cinema is not just historically and architecturally significant but also of tremendous cultural value. The site's context outlined within the Planning Considerations might benefit and be further strengthened by reference to	Reference added to its history as a musical venue and recommending early engagement with bodies including Theatres Trust.	Planning Considerations: The Gaumont State cinema is a Grade II* listed Art Deco movie palace. The building opened in 1937 and was originally designed as a

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			this aspect of the Gaumont State's past as a cultural venue. Supportive of the Design Principles for the site. Recommend that reference is included within the Principles requiring Theatres Trust to be engaged by applicants at an early stage.		cinema but will fully equipped stage for theatre use including workshops and dressing rooms. As well as a cinema, it served as a popular music venue for a number of years. Given its significance, early consultation is advised with consultees such as Historic England, C20, and Theatres Trust.
5.6 South East	BSESA19	Thames Water	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the water supply network and water treatment infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing. This site could be served by both foul and combined sewers. There are no surface water sewers in the area. We will not support discharge of surface water into a foul sewer.	The existing building is to be retained and better utilised for community and cultural uses. This should not give rise to the need for additional servicing.	No change
5.6 South East	BSESA20	Thames Water	Do not envisage water capacity issues for this site. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change

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5.6 South East	BSESA20	Nancy Platt	Support Kilburn square new market. Support local independent sellers. Market should be 'U' shaped with huts for sellers so that they can lock up their stalls, with seating and planters in the central section.	Support noted.	No change
5.6 South East	BSESA21	Jo King	I do not feel this is an appropriate area for 5 story buildings or student accommodation. This building has a unique character, the businesses are independent and young entrepreneurs who would struggle to find alternative accommodations.	The ground floor commercial units are to be reprovided as part of any development. The site is allocated for commercial and housing (which can include student accommodation). The developments adjoining the site are 5 and 6 storeys. Development around this height would be consistent with the building line on this section of the High Street and hide the blank facade Electric House currently presents to the High Road.	No change
5.6 South East	BSESA21	Thames Water	Do not envisage water capacity issues for this site. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.6 South East	BSESA22	Thames Water	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site. There are public sewers crossing or close to the site and it must be ensured these aren't damaged during construction. There is a Thames Water asset located on this site and we own some of the land. Development proposals will need to take account of this feature.	Noted. See text to be added to policy under infrastructure.	There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way. There is a Thames Water asset located on this site and development proposals will need to take account of this feature.
5.6 South East	BSESA22	Greater London Authority (GLA)	As a 'provide capacity' borough Brent should be seeking opportunities through its site allocations to intensify industrial capacity to satisfy the identified need.	Draft policy BE3 requires an increase in employment floorspace on local employment sites, and this is reflected in the site allocation. Further clarification added to supporting text of allocated use and justification.	Planning Considerations: An increase in employment floorspace will be required as part of any redevelopment.
5.6 South East	BSESA23	Thames Water	Do not envisage water capacity issues for this site. The scale of development/s is likely to require upgrades to the wastewater network. This site is only served by foul sewers with restricted access to a surface water sewer. The surface water disposal hierarchy will need to be clearly demonstrated to determine the most appropriate discharge location. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest	Noted. See text to be added to policy under infrastructure and planning considerations.	Planning Considerations: This site is only served by foul sewers with restricted access to surface water sewers. SuDS should be utilised and the surface water disposal hierarchy will need to be clearly demonstrated to determine. Infrastructure Requirements: Thames Water has indicated upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			opportunity to agree a housing and infrastructure phasing plan.		earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.6 South East	BSESA23	Gargreen Ltd (site owner)	1. Supportive of the allocation of the site for residential development on site. However, consider that the indicative capacity should be increased given the town centre location and PTAL. 2. The site area is actually 0.17 Hectares. 3. The site allocation describes the police station as being 'been long-term vacant but is currently being used by a workspace provider.' The site has been a target for squatters and in order to protect the buildings, our client has allowed an artistic studio to use the space. As such, it should be noted that the existing use is only there on a temporary basis and is not a viable business. 4. The design principles section states 'any redevelopment of these units or adjoining car parking should be subordinate to the police station building and should not obscure views to or overshadow surrounding buildings'. This does not reflect pre-application discussions. Consider that a development that would be subordinate would restrict	1. The indicative capacity reflects the sites sensitivity given its location in Willesden Green Conservation Area, proximity to 2 storey housing and a number of heritage assets. 2. The site boundary shown in the Local Plan covers an area of just under 0.14 ha. 3. This is reflected in the site allocation wording therefore no change is needed. 4. The design section has been informed by the Principal Conservation Officer and reflect his formal comments on the planning application.	No change

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			the development of the site. The current proposals include taller buildings however these are set back from the police station.		
5.6 South East	BSESA27	Landrose Development Ltd (site owner)	Support the principle of site allocation BSESA26 Car Wash Strode Road for residential development A current planning application (Ref: 18/3019) is being considered by the Council for 15 residential dwellings and flexible commercial floor space.	Noted.	No change
5.6 South East	BSESA34	TfL Commercial Development	Welcomes site allocation BSESA34: Kilburn Park Underground Station for the allocated uses of station, ground floor commercial and residential upper floors. The allocation states that the site has an indicative capacity for 12 homes; however as a site within the South Kilburn Growth Area and with a PTAL of 6a, we would request that the site is allocated for higher density development.	The station is a Grade II listed building, located within a conservation area and surrounded by other listed buildings. The predominant local character is 3 to 4 storeys. In the absence of a capacity study supported by a Heritage Statement, it is considered 12 units is an appropriate indicative capacity.	No change
5.6 South East		John Cox	An additional 'Gladstone Park' railway station on the West London Orbital (WLO) line is needed to the west of the pedestrian bridge inside the park. Local development would contribute towards the station's capital cost. To avoid the increase of risk to the main WLO project, such a new station could be treated as a separate, later project. The station would increase the very low PTAL of the local area.	A feasibility study will identify and determine optimum stations on the WLO to provide a quality service. Any such station will however not be part of the first phase of the delivery of the line should it progress to implementation. The only stations in Brent proposed at the moment are at Harlesden and Neasden. Feedback shared with council officers involved in taking WLO forward alongside TfL and	No change

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				the other West London Boroughs forming the West London Alliance.	
5.6 South East		Neera Hirani	Bring Metropolitan Line to Willesden Green tube station : there are already additional platforms in place in the existing station which are unused. Platform lift access in Willesden Green tube station.	The council will continue to work with TfL to increase step free station access. The line is managed by TfL who determine the stopping service on a commercial basis. Willesden Green is 3 stops from Wembley and Finchley Road station, which are interchange stations on which you can transfer from the Metropolitan Line to Jubilee.	No change
5.6 South East		S Bartle	Strongly disagree with reducing the sizes of town centres and restricting their usage. Should consider 'flexible' business rates relief on properties to create business incubators or hubs.	Reducing town centre boundaries will allow poorer performing areas with higher levels of vacancy the flexibility to convert to other uses, such as employment. This will support a more vibrant retail core. The setting of business rates is outside the scope of the Local Plan but comment will be shared with Employment & Skills Team.	No change
5.6 South East		Alice Whitehead	Mapesbury would be improved with better cleansing and maintenance.	Comments will be shared with Brent Neighbourhood Manager with responsibility for tackling maintenance issues and anti-social behaviour. These matters are outside of the scope of the Local Plan.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.6 South East		Neera Hirani	Suggests the whole area between the train line and the High Road is included in Willesden Green Conservation Area.	Comment shared with Conservation Officer. Changes to conservation area boundaries is subject to a separate statutory process including further consultation in the affected area. This suggestion can be considered when reviewing the existing Willesden Green boundary.	No change
5.6 South East		Queen's Park Area Residents Association	Due to increased pressure on Queen's Park station from development at South Kilburn, the station needs to be upgraded and step free access secured.	Draft policy BT1 commits the council to increasing the number of station with step free access in the borough. The council will continue to engage with TfL to increase step free access and capacity to meet demand. Queens Park has been successful in attaining Government funding to support step free access, so this should address this matter at least in the next 2-3 years.	No change
5.6 South East		G A Vickers	Kensal Green station needs step free access as well used and has too many stairs. This would help reduce the need to drive from the south of the borough.	The council will continue to work with TfL to increase step free station access.	No change
5.6 South East			Not enough focus on developing good neighbourhood and cohesive communities within Dollis Hill and Cricklewood.	The vision for this place is to create a series of attractive green neighbourhoods focussed around vibrant town centres. The Plan includes policies to protect and secure new community facilities, open spaces and create places where walking and cycling are the	No change

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				preferred method of travel. All of which help community cohesion.	
5.6 South East			People from Kensal Green Backpackers on Harrow road opposite Kensal Green Station use the small green space for drinking and smoking making it feel unsafe. Vehicles driving on pavements and breaking pavement. Barrier outside Kensal green station should be replaced with hump.	Comments will be shared with Brent Neighbourhood Manager with responsibility for tackling maintenance issues and anti-social behaviour. These matters are outside of the scope of the Local Plan.	No change
5.6 South East		Jo King	With the proposed housing development in South Kilburn what are the plans for schools.	To meet future needs a replacement 3 form of entry primary school and nursery are to be delivered at South Kilburn as part of the redevelopment. A new secondary school is to be delivered on the Chancel House site at Church End. Additional score provision requirements will be established with the Council's education service and where necessary identified in the Infrastructure Delivery Plan which will be updated on a regular basis.	No change
5.6 South East		David Walton	Building on the South Kilburn Public Open Space woodland forest garden area is not justified. The loss of open space between Dickens and Austen also needs to be mitigated. Reference should be included to health and arts centre being delivered as part of Peel Precinct development.	There will be no net loss of open space. The Kilburn Park Junior School will be relocated to Wordsworth House/Masefield House site, whilst the school site will become part of South Kilburn Open Space. This will create a more regular shaped open space that can be put to better use and	BSESA9 Kilburn Park Junior School Area: 0.46ha Justification: The existing school will be transferred to the Wordsworth House/Masefield House site which also incorporates some of the existing South Kilburn Open Space. There will be no

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				<p>feel more secure. Old Granville Open Space will be reprovided at equivalent quantity and higher quality as part of the Hereford Exeter site development. This has been clarified in text. Peel Precinct to be added to list of sites with planning permission for clarity.</p>	<p>net loss of open space. Transfer of open space from this site to Wordsworth House/Masefield House site R will be of significant benefit. It will create a more regular shaped open space that can be put to better use and feel more secure. It will raise the profile of the space in the public's consciousness and its impact on townscape by opening up views into the park when arriving from Queen's Park/Kilburn Lane. BSESA11 Old Granville Open Space. The site comprises open space. Compensatory open space of equivalent quantity and higher quality will be provided as part of the Hereford Exeter site development.</p>
5.6 South East			<p>Concerned promotion of Kilburn's 'night time economy' could adversely impact on residents. Brent should ensure that the 'food and drink clusters' are kept to the high road where the impact can be controlled and not allow this to filter down residential side streets. Ensure that opening hours, light, smoke, usage, noise, etc. is kept well managed. Deliveries and waste / collection should also be conducted on the high</p>	<p>Agree the night time economy uses should be focussed on the High Road. Draft Policy BHC4 identifies Kilburn High Road as the location where the Night Time Economy will be supported. Agree there is a need to balance the need to protect small independent businesses that form part of the night time economy and also the amenity of existing residents. The London Plan introduces an agent</p>	<p>5.6.3 There are many notable cultural and heritage assets including the Kiln Theatre (formerly known as Tricycle Theatre) in Kilburn, which has transferred multiple productions to the West End</p>

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			road. Parking measures need to be considered. e.g. perhaps extending resident permit parking to 24/7 like some areas of Islington. This will ensure that residents do not struggle to find parking near their homes. Residents are adversely affected by the extended opening hours of the Kiln Theatre. Should make clear Kiln is the Tricycle Cinema. Ensure that the Kiln does not monopolise Kilburn. It's really important that small independent businesses e.g. restaurants, cafes, bars, live music venues, stand-up comedy venues, etc. have an opportunity to exist in Kilburn.	of change principle, which places the responsibility of mitigating impacts on the proposed new development. In addition, under draft policy DMP 1 planning permission would only be granted subject to not unacceptably increasing to noise, odour, and disturbance. This includes consideration of servicing in addition to use. The council is aware of issues raised regarding impacts from the Kiln during extended opening hours, and is working with the Kiln and residents to resolve these issues. Amendment proposed to set out the Kiln used to be known as Tricycle Theatre.	
5.6 South East		Fiona Mulaisho	Kensal Rise bears the burden of at least 24% of TfL's Bus Network, and its residents pays a huge price for this by way of chronic congestion, illegally high levels of air pollution around the schools and residential areas, very poor road safety environments for pedestrians and cycling along Chamberlayne. None of these problems will be resolved by the Kensal Corridor proposals currently being developed.	The Mayor has committed that any new buses as of 2018 will be electric or 'clean.' Good bus coverage reduces the need to travel by private vehicle, which can reduce congestion and associated air pollution.	No change
5.6 South East		David Walton	1. The Local Plan upgrades Queen's Park to a town centre. It is very close to Kilburn Town Centre. 2. The	1. Queen's Park is an established town centre. This is a longstanding designation which was included in	No change

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			<p>Neighbourhood CIL area boundary is too large. 3. Social tenants moving into new homes have seen increased rents, council tax and service charges. 4. Carlton-Granville needs a dance room, music and arts venue.</p>	<p>the 2004 Unitary Development Plan. 2. The Local Plan does not determine the NCIL area boundary, but comments will be shared with the relevant team. 3. Housing officers undertake a dedicated needs assessment with tenants and take a view on affordability before allocating. Council tax is outside the scope of Local Plan. Social rents on new homes can be slightly higher than on current homes as a new product, however, are set in line with Government target rents. Service charges are kept low and reflect only the services used by tenants. 4. The Granville includes a flexible community space which can be used for a range of activities including dance and exercise.</p>	

SOUTH WEST

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
5.7 South West	Figure 31	Andy Brommage	The intensification corridor along Watford Road should continue southward to the north edge of Barham Park and go partly into the side roads stepping down. This should be matched on the other side of the High Street down to Barham roundabout including the Keeler's corner site. However, the proposed height of 5-6 storeys should be reduced to 4. Harrow Road should be intensified between Barham Roundabout and Wembley Central, with the exceptions of heritage assets such as the fire station.	The intensification corridor notation is not included within the Sudbury town centre as the policy also identifies that this is suitable for buildings of 5 storeys with additional height at strategic points. The Harrow Road is proposed for intensification towards Wembley Central to link up with Wembley town centre. Noted. Intensification corridors contain buildings which are generally 2-3 storeys in height. The redevelopment of these units to provide buildings which are 4 storeys does not make sufficiently high density development within areas that have good public transport to contribute to meeting Brent's growth targets. It also reduces viability which would limit potential delivery.	No change
5.7 South West	5.7.2	Sudbury Town Residents' Association Forum	Para 5.7.2 misrepresents STRA's Neighbourhood Plan. Policy VF1 is not stated in full in Brent's Local Plan and is misleading. STRA requests this paragraph is removed and the consultation is restarted.	The Brent Local Plan is clear that Vale Farm is designated Local Green Space and that the Forum's ambition is for it to be a regional centre for sports excellence. There is no need for the Brent Local Plan to repeat other development plan policy. The paragraph will not be removed.	No change
5.7 South West	5.7.2	Chirag Gir	Para 5.7.2 mentions STRA however fails to mention Wembley Central	The reference to STRA will be removed as it is the contents of the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Residents' Association (WCARA). WCARA should be mentioned as our goals and aims are very similar to those of STRA.	Neighbourhood Plan that are important, rather than a specific forum or residents group the names and activities of which can change in a short space of time.	
5.7 South West	5.7.2	Sudbury Town Residents' Association Forum	Details in Paragraph 5.7.2 contain misrepresentations of STRA's neighbourhood plan. STRA do not support the unfettered development of the site. Policy VF1 from STRA's neighbourhood plan clearly outline this and should be included within the local plan stating that there should not no loss of open space, with developments only being accepted for the following uses: recreation, sporting, and amenity. In the future approval should be sought from STRA regarding proposed content in official documents, with a minimum of 4 weeks' notice.	The paragraph gave a true reflection of STRA's position as the Local Green Space designation would essentially prevent unsupported development of non-open space related uses. For the purposes of clarity, the wording can be amended. The Council is under no obligation to seek approval for contents of its documents from STRA and will not be taking a different approach to consultation for this organisation.	Amend 5.7.2. third sentence to: "It also highlights the importance of Vale Farm, designating it as a Local Green Space. It supports recreational, sporting and amenity uses that strengthen the potential for Vale Farm as a regional centre for sporting excellence."
5.7 South West	Figure 32	Andy Brommage	The Fire station is fine local building & should be preserved. The recent developments either side have been good interventions. The Sudbury Town station car park development should provide infrastructure improvements. 30 homes are identified however hostel type accommodation and studio/ 1 bed flats should not be excluded.	The Fire Station is Grade II listed, the dwellings either side are locally listed. The residential development of the station car park is currently proposed for discount market housing by TfL and their preferred developer Pocket Living. Hostel accommodation is not currently part of that scheme, but would be compatible with the residential allocation subject to other policies within the Plan.	No change

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5.7 South West	BP7	Rajiv Bajaria	Very comprehensive overview of plans across Brent and Wembley in particular. Lots of detail on new homes but very little about key infrastructure such as schools, hospitals, libraries to support the new population. The proposals go against Sudbury Neighbourhood Plan by building 5-6 storey buildings which will ruin Barham Park along Harrow Road and Watford Road	Sudbury Neighbourhood Plan includes no restrictions within its policy as to the height of development within the area. The existing 2-3 storeys will remain across the vast majority of the area, with the exception primarily to the potential development of the town centre and intensification corridors. Harrow Road is very wide, with the units along it proposed for inclusion within the intensification corridor being set back from the road, and thus the park, even further. The redevelopment of these units will not compromise the character of the park and will allow for more residents to benefit from its view and improves its overlooking/ safety. In reviewing the appropriateness of potential developments along such corridors, the Council will take into consideration a wide range of variables, including impact on the park.	No change
5.7 South West	BP7	John Cox	Add text to policy BP7 to encourage a reduction in traffic dominance and enhancement of the public realm around A404 Watford Road. A404 should be studied as a possible new orbital tram route.	There are currently no plans to enhance the public realm around the A404 Watford Road. Although relatively heavily trafficked at peak times, it is not considered that for the most part that traffic dominates the area to the detriment of pedestrian \ cyclist movement. Trams are a very capital intensive transport solution and whilst there was investment in	No change

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				them around the turn of the century it is unlikely that such a scheme for Watford Road would be able to attain funding support even if the case was very good.	
5.7 South West	BP7	Divia Patel	Alperton and Ealing Road need better quality shops rather than more specialist Asian shops. There should be a policy limiting the number of similar shops on the road as there is an abundance of poor quality Indian clothes shops.	The Vision for the South West place seeks to enhance and promote the current specialist retail hub within Ealing Road as it acts as a draw. This will be mostly be achieved through non-planning related measures. This will also address the quality of the shops.	No change
5.7 South West	BP7	Pocket Living	Strongly support the plan for the South West Place, and believe that due to limited land availability, land which is available should be utilised to deliver the maximum residential density possible. Sudbury Town Station car park should be included within the intensification corridors. Building heights within intensification corridors should be more flexible so as not to remove the potential for taller buildings where justifiable. Therefore, part b of policy BP7 should be amended for flexibility, stating simply: 5-6 stories 'could' be appropriate.	Noted. Sudbury Town Station car park has been identified as a site allocation (BSWSA13) and therefore does not need to be designated as an intensification corridor also. Areas for which tall buildings have been specifically identified as appropriate are laid out in the Tall Building Strategy. The adjacent station listed building limits the extent to which taller buildings are in any case appropriate in this location.	No change
5.7 South West	BP7	Ashleigh Bell	Buildings in the growth areas should not exceed 12 storeys. New developments should be supported by new facilities i.e. cafes, supermarkets, pharmacies, as well	Policy BD1 in conjunction with the Tall Building Strategy sets out locations within the borough which are deemed appropriate for tall buildings, and the height those	No change

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			as open space and parking. The Grand Union Canal needs to be improved with footpaths, lighting etc.	buildings can rise to. Some areas will exceed 12 storeys, particularly where existing buildings/ consents for buildings taller than this occur. Commercial floorspace is considered on a site by site basis, it is usually provided within residential developments where viable in terms of its likely occupation and includes the mixes of uses identified. Policy BG11 outlines the requirement of developers to support the provision of new, and enhancement of existing green infrastructure, particularly in those places identified as deficient by the open space, sport and recreation study. The improvement of the canal and its setting are sought through criteria E of policy BG11 also, with details surrounding its improvement for active transport being within criteria O of policy BP7. Parking will be provided in line with policy BT2 of the Local Plan which seeks developments to be car free within areas of high Public Transport Access Levels (PTAL).	
5.7 South West	BP7	Andy Brommage	Agree with major developments in these areas. 5-6 storeys is too high on Watford Road and Sudbury High Street and should be reduced to 4 storeys.	Noted. The appropriateness of individual heights of developments will be assessed at the application stage. Whilst it will result in a change of character, this change is not regarded as significantly detrimental given the corridor's and town centre's features. It will reduce	No change

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				the need to find alternative sites over a wider area which will adversely affect character in a greater way.	
5.7 South West	BP7	John Haskell	Object to any residential development at Vale Farm as it is protected by a covenant. Sport England would object to any loss or reduction of green space.	Noted. The Plan makes no reference to developing housing on Vale Farm, it identifies the Neighbourhood Plans' objective of creating a regional centre for Sports Excellence.	No change
5.7 South West	BP7	Mary Farrell	If the development of intensification areas is dependent on existing properties being bought up or acquired by compulsory purchase, this will blight areas as it happens over a long period of time. How were the areas identified and what criteria were used?	The development of intensification corridors is not dependent on existing properties being bought up or acquired using Compulsory Purchase Orders. At this stage it is assumed, as is the case with nearly all development sites, that the landowner and potential developer will be able to agree a price. The areas were identified by identifying main roads, taking account of PTAL (3 or ideally above) and the width of the street, which would allow taller development without it being overbearing.	No change
5.7 South West	BP7	Shilpa Patel	Object to any change of use of Vale Farm. It is unnecessary to build any more homes or high-rise development in Sudbury.	Noted. The Plan makes no reference to stopping sports ground use of Vale Farm, it identifies the Neighbourhood Plans' objective of creating a regional centre for Sports Excellence. No 'high rise' development is proposed for Sudbury, only modest height increases of up to around 5 storeys.	No change
5.7 South West	BP7	Cassandra Cheng	I am angry and concerned that Vale Farm sports ground will no longer be	Noted. The Plan makes no reference to stopping sports ground use of Vale	No change

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			available to use. I am highly against this plan. STRA policy has not been included in full in Local Plan.	Farm, it identifies the Neighbourhood Plans' objective of creating a regional centre for Sports Excellence. The Local Plan does not need to repeat Neighbourhood Plan contents.	
5.7 South West	BP7	St George	There may be sites outside of the proposed tall building locations which can accommodate a tall building, and the draft policy should include flexibility for this. Support BP7 para o). BP7 t) should be deleted as a new bridge would not bring noticeable benefits. Opportunities to use the existing bridge should be explored.	Noted. The Tall Buildings Strategy identifies significant parts of the borough suitable for very tall buildings which has informed the locations identified in the Plan. The Council is seeking to concentrate new tall buildings in particular areas, rather than encourage random placement across the borough. Nevertheless, the policy will be amended to allow for opportunities related to large scale development sites not yet identified that come forward for development which might be able to create their own character/ accommodate tall buildings that are sympathetic to the surroundings. In relation to the bridge across the river, given that there is an existing bridge if it is capable of reuse then it is agreed that this should be explored. The wording of the policy will be amended to allow greater flexibility on solutions.	Amend BP7 criterion t) to: Supporting a new or enhanced crossing to connect the Northfields Industrial Estate regeneration to new development on both sides of the River Brent and the Grand Union Canal."
5.7 South West	BP7	London Borough of Harrow	Whilst there is no objection in principle to the intensification corridor on the southern side of Harrow Road before the intersection with Greenford Road, care must be	Noted.	No change

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			taken to ensure appropriate development takes place which respects nearby the nearby Sudbury Hill Conservation Area and potential Harrow Hill Neighbourhood Plan. Support the need to respect the low-rise character of Sudbury.		
5.7 South West	BP7	OPDC	Part r) could also refer to improving links into Park Royal industrial area	Noted. Reference to the potential to improve access to Park Royal/ Old Oak will be added to paragraph 5.7.28	Add final sentence to paragraph 5.7.28. "It will also enhance the canal's role as an important route to Park Royal, Old Oak and central London."
5.7 South West	BP7	Vardy Limited	Policy BP7 is supported, especially in respect of residential-led mixed use development within the Alperton Growth Area.	Noted.	No change
5.7 South West	BP7	Jean Peacock	Strongly object to the level of development proposed for Sudbury, particularly 5-6 storey development of intensification corridors and any non-sporting uses at Vale Farm.	Noted. The Plan makes no reference to stopping sports ground use of Vale Farm, it identifies the Neighbourhood Plans' objective of creating a regional centre for Sports Excellence. The intensification corridors are considered necessary to address the significant housing need for the borough. The vast majority of Sudbury will remain 2-3 storeys.	No change
5.7 South West	BP7	TfL Commercial Development	Support the provision of high density development in Growth Areas within Policy BP7. A limit of 5-6 storeys in town centres is restrictive. This threshold should be replaced with a more flexible approach. Support part e) and Brent's desire to	Noted. The suggested height is considered appropriate when taking account of the existing character and sub-urban nature of the area which is essentially 2-3 storeys. Noted. Noted.	No change

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			see co-location on industrial land where suitable. Support BP7 transport policy.		
5.7 South West	BP7	Roger Nicklen	Object to any development which would reduce the amount of public green space at Vale Farm or would change the existing use of any part of the site.	Noted. The Plan makes no reference to stopping sports ground use of Vale Farm, it identifies the Neighbourhood Plan's objective of creating a regional centre for Sports Excellence.	No change
5.7 South West	BP7	Sunil Shah	The plan for Sudbury will reduce local amenities which are already overstretched. Object to any intensification corridors.	Noted. Population increases will require additional infrastructure. There will be increased use of amenities, where these are 'over-stretched' additional provision is likely to be prioritised.	No change
5.7 South West	BP7	Divia Patel	The low rise outlook of Alperton and Wembley should be maintained. High rise developments cease to be maintained after 5 years and their appearance and internal upkeep becomes unpleasant and difficult to live in.	The existing 2-3 storeys will remain across the vast majority of the area, with the exception primarily to the potential development of the town centre and intensification corridors. Taller buildings will require active management due to their leaseholder occupation and the requirement to maintain communal equipment such as lifts. It is therefore considered that the risk of lack of maintenance is low.	No change
5.7 South West	BP7	Alison Wadmore	Due to the Sudbury Neighbourhood Forum, it is seen that the plan has a bias toward the protection of Sudbury, leaving Wembley central to pick up the slack. Betting shops an issue, but worse still is the proliferation of small arcades. Need a broader range of shops within the	The Plan does not prioritise development at Wembley at the expense of Sudbury town due to the activities of the Neighbourhood Forum. Wembley has long been a priority location for additional development through its Growth Area status. Whilst it is recognised that	No change

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			Wembley area, as much of the offer focuses on the Indian market. Do not approve of current developments along Wembley High Road.	Wembley High Road needs a wider variety of shops, it is facing significant competition from other centres, where quality retailers are likely to prioritise their investment. An Action Plan will assist in improving the town centre's prospects, nevertheless without significant changes to the demographic of the surrounding population this will most likely result in maintaining the centre rather than significant improvements.	
5.7 South West	BP7	Sudbury Town Residents' Association Forum (petition - 537 signatures)	No more homes required in Sudbury. Intensification corridors will be out of character and in opposition to proposed policy BP7. Over development along entry and exit roads will hamper access and degrade character, and of general detriment to residents. Development of apartment blocks in close proximity to open spaces will damage their character. Do not support attempts to bolster the night time economy as consists entirely of the sales of alcohol and is therefore of detriment to the wellbeing of people and the community itself.	Additional homes are required in Sudbury to meet the overall needs of the borough in relation to its needs and London Plan targets. Whilst there will be a change in character along the intensification corridors, this is a mechanism for limiting the change in character that would result in required housing targets to be met on other sites across a wider area. Measures will be in place to ensure that unacceptable transport impacts are not created by the developments. There is a significant gap between the open spaces and any likely development in most cases. Impact will be marginal and not necessarily adverse in terms of character. The Plan makes no specific reference to bolstering the night-time economy in Sudbury. References are however made to Wembley. The offer of	No change

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				Sudbury town centre will however have to alter over time to ensure that it remains a vital and vibrant place, this may include leisure and night time economy uses.	
5.7 South West	BP7	Canal & River Trust	The principle of better cycle links along the canal is supported, but this should be restricted to the towpath rather than the offside.	Noted. This is understood, but a total restriction is not considered appropriate at this stage. It is considered more appropriate to assess the character of the development, the width of the route/ amenity space next to the canal and the potential to link with other adjacent sites/ longer routes.	No change
5.7 South West	BP7	Manjul Shah, Mitesh Mashru	Would like to understand how improvements at Vale Farm can support the improvement of the Jalaram Jyot Mandhir, and how the temple can fit into the wider plans for Vale Farm.	Noted. There are no 'wider plans' being taking forward by the Council currently.	No change
5.7 South West	BP7	Neil Zussman	New transport links must be built in Alperon before more homes are built. Traffic is bad between Alperon and Hanger Lane and parking is scarce.	Through policy BT1 the council will seek to improve the uptake of sustainable methods of transport which do not increase the levels of congestion currently present. This will include increasing the use of public transport and active transport methods by increasing its appeal through public realm enhancements and reducing barrier to access by improving associated infrastructure and addressing safety concerns. This will be in conjunction with policy BT2 which seeks to limit the amount of	No change

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				parking available and therefore the levels of car dependency, whilst increasing monitoring through the strategic level Controlled Parking Zone (CPZ). A transport assessment of Alperton has been undertaken which will inform the transportation solutions taken forward.	
5.7 South West	5.7.14	Canal & River Trust	It is agreed that tall buildings will become part of the character of the Grand Union Canal in this area, however there are potential negative impacts of tall buildings around our waterways. Refer to response on policy BD1.	Noted.	No change
5.7 South West	5.7.24	St George	Need for a health centre as part of new development is accepted. Text should clarify that delivery is dependent upon support from the CCG. More work is needed to determine what, if any, health facilities may be needed.	Agreed. Amend the wording of the policy to reflect delivery being dependent on the support of the CCG.	Amend BSWSA7 Infrastructure to include "where this has support from the CCG" after the works health clinic.
5.7 South West	5.7.25	Andy Brommage	The wording has been twisted to suggest the Neighbourhood Plan supports any development other than for sports use. The last sentence must be deleted.	This is not the case, however the wording will be replaced to reference only the Local Green Space designation.	Amend to only make reference to the Local Green Space designation.
5.7 South West	5.7.26	Andy Brommage	It is a shame and contrary to national policy that there is no mention of aiming to enhance the open spaces to increase biodiversity.	The policy is meant to pick out place specific actions related to development proposals. The policy BG11 has been amended to now seek a net gain in bio-diversity within developments. Major bio-diversity improvements to open space are	No change

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				essentially a council park/ open spaces management issue. The community is able to promote and bid for funding for viable biodiversity improvements to open space by bidding for funds from neighbourhood CIL.	
5.7 South West	5.7.26	St George	The promotion of delivering significant open space and new cycle and pedestrian routes in paragraphs 5.7.26 and 5.7.28 is welcomed.	Noted.	No change
5.7 South West	5.7.28	Andy Brommage	Discouraging private vehicle use is a poor choice of words as they could be electric. Development needs to accept private vehicle use but with a new way of thinking such as shared ownership or brief hiring.	Noted. Electric charging points are supported within Policy BT1. Car clubs are supported within London Plan policy T4. The Council, through policies BT1 and BT2 is seeking to reduce car dependency. In the short to medium term at least polluting cars will be the principal form of private vehicle movements. In addition to pollution, cars also reduce health and general well-being by increasing the uptake of a sedentary lifestyle. The current road network is already at capacity at peak times, with limited space and funds to provide additional roads which in any case would as history has shown simply increase car usage and reach full capacity very quickly. As such the need to reduce private vehicle use is still considered necessary as an aim overall, even though it is accepted	No change

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				that in some cases these vehicles might not cause exhaust emissions at the point of use.	
5.7 South West	5.7.28	Pocket Living	Prioritising public transport should be a Plan requirement across the SW area. Policy BP7 should be amended to reflect this.	This is covered by policy BT1 which intends to increase the uptake of sustainable transport methods, including public transport.	No change
5.7 South West	5.7.29	Andy Brommage	The last sentence is not understandable English.	Accepted.	Amend last sentence of paragraph 5.7.29 to: "Developments requiring improved public transport accessibility to their sites will be expected to improve the quality of bus services."
5.7 South West	5.7.29	Pocket Living	It is unclear how new development is expected to increase bus service quality, and how this is related to CIL payments. This should be clarified.	CIL addresses general physical changes to roads and transport facilities where significant impacts from a particular development cannot be evidenced. For bus service improvements where the proposed development can be identified to have a significant impact on a service's capacity which results in the need for additional investment in that service a S106 obligation will be sought on the advice of TfL.	No change
5.7 South West	5.7.30	St George	The benefits of a bridge over the canal connecting Northfields Industrial Estate to the industrial land south of the canal are considered to be limited. If the land to the south was intensified via co-location the benefits of the bridge would be maximised.	Consistent with changes proposed to policy BP7, the paragraph has been removed to avoid repetition.	This paragraph has been removed.

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5.7 South West	BSWSA1	Vardy Limited	The allocated use is supported. The sites could provide over 1,000 dwellings as shown in the masterplan supplied.	Support noted. Agree that the sites have capacity for over 1000 dwellings.	No change
5.7 South West	BSWSA1	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements'.
5.7 South West	BSWSA1	Canal & River Trust	Support the creation of active frontages where a development is along the open spaces north of the canal. Redevelopment of this site should incorporate the existing moorings on the canal	Noted. See proposed changes.	Site allocation BSWSA1 to include the enhancement of the existing moorings along the southern stretch of the canal.
5.7 South West	BSWSA2	Chirag Gir	The existing Sainsbury's car park is often full in the evenings and weekends. If all the proposed development takes place the junction close to Hanger Lane will become congested.	Noted. The Policy provides the opportunity for Sainsbury's to redevelopment their site, not a requirement. Clearly from an operational perspective they and the Council will want to ensure sufficient parking is provided to meet operational needs. This could however be in a multi-storey form. Suitable mitigation measures will be included in developments from a	No change

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				transportation perspective to ensure that the potential for significant impact on the Hangar Lane junction does not occur.	
5.7 South West	BSWSA2	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.7 South West	BSWSA2	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.	Noted. If the provision of boater facilities is considered viable in this location, then it is considered appropriate to test the opportunities for its provision on this site.	Add to BSWSA2 planning considerations: "The opportunity to incorporate a boater facility hub on the site should be explored with the Canals and Rivers Trust."
5.7 South West	BSWSA3	Sport England	The replacement for the Atlip Centre should also include a gym so there is no loss of sport facilities. This should be made clear in the allocation.	Noted. It is the owner's intention to replace the gym in the development. As this is a commercial facility and there is good gym coverage in the area, with new residential developments including gyms as part of their offer, this is not considered an appropriate policy requirement.	No change

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5.7 South West	BSWSA3	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.7 South West	BSWSA3	Canal & River Trust	Support 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.	Support noted. There is an existing route to the canal from this site, although it is not very well overlooked. There is an opportunity to enhance its setting through development to make it more pleasant.	Add to Design Principles: "The setting of the canal and the access point to the towpath should be enhanced through buildings positively addressing these spaces."
5.7 South West	BSWSA4	Greater London Authority (GLA)	As a provide capacity borough Brent should seek to increase industrial floorspace by 43ha over the plan period. The release of industrial land, as is present in this allocation, would only be considered appropriate where it forms part of a borough-wide strategy, underpinned by evidence demonstrating plans to incur a net increase over the plan period. This also applies for: BESA1, BSSA5, BSSA6, BSSA8, BSESA18, BSWSA4, BSWSA6 & BSWSA15.	The allocation makes it clear that no net loss of employment floorspace will be sought. This can also be considered against the adopted London Plan contents and other employment policies in the Brent Local Plan.	No change.

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5.7 South West	BSWSA4	John Cox	Additional pedestrian bridges and access to the Grand Union Canal should be considered. The borough should work with OPDC to provide lighting schemes and towpath widening. "Publically" should be spelled "publicly".	Additional public access to the canal is set out in design principles. The proximity of this site to an existing new pedestrian/ cycle bridge with linkages to this required in this site's development mean that a new bridge in association with this development is not considered necessary. The spelling will be amended.	Amend spelling of publically to publicly.
5.7 South West	BSWSA4	Canal & River Trust	Allocation text is supported; however appropriate heights should also be established in the text. The moorings section of the policy should be amended to state "new moorings will be required where they would not have an unacceptable impact on the blue ribbon network, including its navigability, water resources and biodiversity".	The policy makes reference to 'mid-rise' development being appropriate. Acceptable heights will be assessed as part of the application process within this parameter. The inclusion of moorings will need to consider these aspects, as such it is considered appropriate for them to be incorporated in the policy.	Amend final point on SWSA4 planning considerations to: "New moorings will be required subject to not having on canal's navigability, water quality and biodiversity".
5.7 South West	BSWSA4	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development to ensure essential infrastructure is delivered prior to the development creating

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					identified additional capacity requirements.
5.7 South West	BSWSA5	Greater London Authority (GLA)	As a provide capacity borough Brent should seek to increase industrial floorspace by 43ha over the plan period. The release of industrial land, as is present in this allocation, would only be considered appropriate where it forms part of a borough-wide strategy, underpinned by evidence demonstrating plans to incur a net increase over the plan period. This also applies for: BESA1, BSSA5, BSSA6, BSSA8, BSESA18, BSWSA4, BSWSA6 & BSWSA15.	The allocation makes it clear that no net loss of employment floorspace will be sought. This can also be considered against the adopted London Plan contents and other employment policies in the Brent Local Plan.	No change.
5.7 South West	BSWSA5	Canal & River Trust	Allocation text is supported; however appropriate heights should also be established in the text. The moorings section of the policy should be amended to state “new moorings will be required where they would not have an unacceptable impact on the blue ribbon network, including its navigability, water resources and biodiversity”.	The policy makes reference to 'mid-rise' development being appropriate. Acceptable heights will be assessed as part of the application process within this parameter. The inclusion of moorings will need to consider these aspects, as such it is considered appropriate for them to be incorporated in the policy.	Amend final point on SWSA5 planning considerations to: “New moorings will be required subject to not having on canal's navigability, water quality and biodiversity”.
5.7 South West	BSWSA5	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential

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			strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.		infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.7 South West	BSWSA6	Greater London Authority (GLA)	As a provide capacity borough Brent should seek to increase industrial floorspace by 43ha over the plan period. The release of industrial land, as is present in this allocation, would only be considered appropriate where it forms part of a borough-wide strategy, underpinned by evidence demonstrating plans to incur a net increase over the plan period. This also applies for: BESA1, BSSA5, BSSA6, BSSA8, BSESA18, BSWSA4, BSWSA6 & BSWSA15.	The allocation makes it clear that no net loss of employment floorspace will be sought. This can also be considered against the adopted London Plan contents and other employment policies in the Brent Local Plan.	No change
5.7 South West	BSWSA6	Canal & River Trust	Allocation text is supported; however appropriate heights should also be established in the text. The moorings section of the policy should be amended to state “new moorings will be required where they would not have an unacceptable impact on the blue ribbon network, including its navigability, water resources and biodiversity”.	The policy makes reference to 'mid-rise' development being appropriate. Acceptable heights will be assessed as part of the application process within this parameter. The inclusion of moorings will need to consider these aspects, as such it is considered appropriate for them to be incorporated in the policy.	Amend final point on SWSA6 planning considerations to: “New moorings will be required subject to not having on canal's navigability, water quality and biodiversity”.
5.7 South West	BSWSA6	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing

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			housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.		and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.7 South West	BSWSA7	St George	Support for allocation of site BSWSA7. Capacity and timescales should be considered as indicative only, providing the necessary flexibility for development to adapt to external pressures; this is also true for the description in general. Support for policy BE2 in the promotion of co-location. It states within this site allocation that it should be 'designed in line with principles set out in planning permission 18/0321'. This is not clear to the reader and should be reworded to state what exactly this means, especially considering the volume of information outlined in permission 18/0321. This is also true when reference is made to the 'principles' in permission 18/0321.	Agreed. The allocation will take the main design principles from the planning permission and seek their continuation in the allocation.	BSWSA7 makes greater specific reference to design principles that should be delivered in the development.
5.7 South West	BSWSA7	Environment Agency	Suggest the inclusion of WFD action within red line boundary, specifically "Fish easement for fixed crest weir just south of Brent Junction".	Noted. See proposed change.	added: 'Should the opportunity arise through any revisit of the planning permission then potential for the fish easement should be considered'.
5.7 South West	BSWSA7	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water	Thames Water has indicated the scale of development is likely to require upgrades to

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			recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.7 South West	BSWSA7	Canal & River Trust	We note the planning application has already approved for this site, and a canal-side path and public realm is already proposed.	Noted.	No change
5.7 South West	BSWSA8	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.7 South West	BSWSA8	Quintain	The allocation should state that development proposals for this site must not prevent the Wembley Triangle highway improvements coming forward.	It is agreed that this could be made clearer in planning considerations and also identified as a risk. Highways has recognised that no additional land take is required from this site for Wembley triangle highway improvements.	Amend BSWSA8 planning considerations with an addition point: "Landowners and site developers are encouraged to work together to ensure masterplan delivery as this is more likely to happen". Amend

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					BSWSA8 Risks with an addition point: "Fragmented nature of land ownership could increase time taken to deliver and if not properly managed a piecemeal rather than comprehensive approach to redevelopment, resulting in a disjointed environment and inadequate infrastructure."
5.7 South West	BSWSA9	Thames Water	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The surface water drainage strategy should be consistent with London Plan policy requirements, including achieving greenfield run off rates.	Noted. See text to be added to policy under infrastructure. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
5.7 South West	BSWSA11	Valerie Gordon	Object to further homes being built opposite Barham Park. Anything high-rise would overlook the park.	Harrow Road is very wide, with the units along it proposed for inclusion within the intensification corridor being set back from the road, and thus the park, even further. The redevelopment of these units will not compromise the character of the park and will allow for more residents to benefit from its view. In reviewing the appropriateness of potential developments along such corridors,	No change

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				the Council will take into consideration a wide range of variables, including impact on the park.	
5.7 South West	BSWSA11	Wendy Martin	Keelers site should be kept as an employment site.	The draft London Plan plus Brent's DMP14 mean that when considered currently any application should ordinarily replace the existing employment floorspace. The site allocation will be amended to incorporate the need for replacement employment space.	Amend BSWSA11 Allocated Use to: " Residential/ employment (Business Use Class)" and Current Comments to: "Ground floor employment use maximised, with upper storeys residential."
5.7 South West	BSWSA13	Paul Lorber	The council's adoption of car free development, in particular regards to this site allocation, is unrealistic with a proposal to retain 3 spaces exclusively for disabled residents. Pocket living have a proposal which suggests 30 spaces. Results of the proposed CPZ are yet unclear due to opposition, with potential impacts resulting in the increase in the paving over of front gardens for private parking. In reality car free developments exist for developers to provide more residential units. Car free developments are not sympathetic to those who require vehicles for business, or those who travel at night and do not feel safe using public transport. Since the 245 bus no longer stops at the station, more people need access by car which requires parking. Before a car	Noted. The Council is pursuing an approach to reduce car usage within the borough, by increasing the uptake of sustainable transport methods through policy BT1 and reducing car usage directly through the reduction in car parking facilities via policy BT2, both of which are supported by London Plan policy. This will help Greater London meet its strategic objectives. On this site, given its public transport accessibility and the ability to administer a controlled parking zone in the vicinity a car free development in principle is acceptable. The provision of some retained station parking to support disabled users should however be clarified.	Add to BSWSA13 Comments: "Suitable levels of replacement car parking for disabled station users must be retained."

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			free development policy has been adopted, a review of car free developments built in the last 10 years should be undertaken.		
5.7 South West	BSWSA13	TfL Commercial Development	Support the allocation of BSWSA1. Also support the allocation of BSWSA13 however the indicative capacity of 30 units would not make the most efficient use of the site. This site could accommodate a minimum of 65 units.	Noted. The capacity is indicative only and is therefore flexible providing appropriate justification.	No change
5.7 South West	BSWSA13	Pocket Living	Allocation of BSWSA13 is strongly supported, however the indicative capacity should be increased to reflect the 61-unit scheme currently proposed by Pocket Living. Additionally, a boundary plan should be provided for the 'Other Site Allocations'.	Noted. The capacity is indicative only and is therefore flexible providing appropriate justification.	No change
5.7 South West	BSWSA13	Historic England	This site sits immediately next to the Grade II* Sudbury Station. Given the urban and transport context of the site, new development may well be possible without any impacts on significance. However, in order to ensure adequate consideration of any effects the designated status of the station should be made clear.	Noted. The designated status of the station will be made clearer in the publication version of the Local Plan.	Amend BSWSA13 Comments to: "Development should protect and enhance the setting of the Grade II* listed Sudbury Station."
5.7 South West	BSWSA14	Greater London Authority (GLA)	As a provide capacity borough Brent should seek to increase industrial floorspace by 43ha over the plan period. The release of industrial land, as is present in this allocation, would only be considered appropriate	The allocation makes it clear that maximum replacement employment floorspace will be sought. This can also be considered against the adopted London Plan contents and	No change

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			where it forms part of a borough-wide strategy, underpinned by evidence demonstrating plans to incur a net increase over the plan period. This also applies for: BESA1, BSSA5, BSSA6, BSSA8, BSESA18, BSWSA4, BSWSA6 & BSWSA14.	other employment policies in the Brent Local Plan.	
5.7 South West		Sudbury Town Residents' Association Forum	The South West and Central places will provide 90% of the total requirement of 24,000 dwellings. It is unreasonable to place the burden on only two areas. The infrastructure, roads and facilities cannot cope and could never be developed or provided.	The Housing Trajectory, which provides an estimate of developments which are going to come forward over the plan period, approximate that delivery within the South West and Central places over the next 10 years will be 61% of the total number of homes delivered within the borough during this period. Much of this development (approximately 80%) will come forward within the places growth areas of Wembley and Alperton. These are the locations which have been identified as appropriate for development due to the presence of certain features. particularly the high public transport access level which facilitates the delivery of higher density developments. There is a desire to create a critical mass of infrastructure within the wembley area which will be assisted by the increase in population, and supported by it.	No change
5.7 South West		Divia Patel	Redevelopment of Alperton station/ bus garage is necessary. The station	Both the Bakerloo and Piccadilly lines are proposed to receive	No change

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			does not have capacity for further residential development. There is a need for further health facilities in Alperton.	improvements to both capacity and range which will assist the Alperton area in public transport capacity and uptake. Developers will be expected to produce transport plans and where identified, increase the ability of bus services to meet the needs of the additional population in using non-car modes. A health centre will be provided as part of the Northfields Industrial Estate regeneration scheme. It will be located to the west of the site in order to best meet the needs of new and existing residents. The Council would support the redevelopment of the bus depot, subject to an appropriate replacement facility being delivered.	
5.7 South West		Neil Zussman	Alperton Medical Centre is convenient. I've never visited Ealing Road library but I'm glad it's there	Noted.	No change
5.7 South West		Sudbury Town Residents' Association Forum	The comparison of Sudbury to Wembley Parks gives a false impression to the reader. Wembley Park's night-time economy is based on alcohol shops, betting shops and fast food outlets, uses which STRA want to limit. Object to the council using the strong night-time economy in Sudbury to justify building 5-6 storey developments. STRA requests the council explains how it intends to stop the licensing of	Noted, but this is not how Wembley Park's night time economy is comprised. The Council is not using a strong Sudbury night time economy to justify tall buildings. The control of hours of the uses identified is largely a result of licensing functions as most of these uses probably have not required planning permission, so would not have been subject to conditions on hours of use.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			24-hour alcohol shops, betting shops and fast food outlets.		
5.7 South West		Renu Kaul	Ealing Road should be pedestrianised and paan spitting heavily fined. Development in Sudbury should not be higher than 2-3 storeys in accordance with Sudbury Neighbourhood Plan	The Vision for the South West place includes the enhancement of Ealing Road and its promotion as a specialist retail hub. This will involve public realm improvements. The prohibition of spitting is not within the remit of the local plan. The requirement for developments to be a maximum of 2-3 storeys is not set out within Neighbourhood Plan policy.	No change
5.7 South West		John Cox	Developers should be offered extra building height for any larger public realm they can offer. A proper Wembley Bus Station is needed. The junction of Ealing Road and High Road should be widened and made more pleasant for pedestrians by removing a corner building.	This is occasionally a consideration as part of the planning process. The junction of Ealing Road and High Road is a tight spot where more space for pedestrians would ensure a better environment for them. Any improvements will however have to be done within the existing highway boundary as there are no plans for additional land take to widen this highway area.	No change
5.7 South West		Sudbury Town Residents' Association Forum	Areas identified as intensification corridors are not seen as appropriate for development and will undermine the low rise character of the area, being in direct conflict with policy BP7. It is also unrealistic for these developments to be car free and will result in unenforced on street parking outside of monitoring hours.	Developments within intensification corridors will be subject to the usual considerations associated with planning applications, including height and massing, character and the potential requirement for parking. The sites for intensification corridors have been chosen due to access to public transport and their position on wide roads so as to	No change

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				<p>reduce impacts of scale. Given the scale of development required, it is inevitable that the character of some areas will change. The introduction of Controlled Parking Zones (CPZ) will ensure that car free developments will not result in increased parking uses of streets.</p>	
5.7 South West		Chirag Gir	<p>How many homes proposed for South West Place? Concern over intensification corridors and intensification in general. Need to provide more schools as currently people have to travel too far. Concern that car free developments will cause streets to become car parks. There must be improvements to public transport which cannot come at the expense of current road users. How many more health facilities will be built? How are we aiming to connect schools to green infrastructure for children's exposure to nature? What resources are going to be provided to improve policing? How are fire services going to cope with the additional properties, many of which high rise? Will Brent ensure that developers deliver various community spaces? The plan includes no details as to how transport facilities, such as the Bakerloo and Piccadilly lines, are going to be improved to combat additional population. How is this</p>	<p>The Housing Trajectory estimates that delivery within the South West place over the next 10 years will be 6272 homes. Much of this development (approximately 80%) will come forward within the places growth areas of Wembley and Alperton.</p> <p>Criteria L of policy BP7 acknowledges the places need, under increasing population pressures, for the provision of new community facilities, especially schools.</p> <p>The Council will aim to increase the uptake of active travel modes such as walking and cycling, and public transport, it cannot be guaranteed that this will not be at the expense of current road users.</p> <p>A health centre will be provided as part of the Northfields Industrial Estate regeneration scheme. Other known requirements for infrastructure will be identified in the infrastructure delivery plan. Space for waste management will be</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			being planned for? How is the increase production of waste from the higher population going to be managed? How significant are the changes needed to the current sewer system? Is green space to be protected and enhanced, with the provision of more for current and future residents, and wildlife too? How is it planned for the increase in commerce to avoid residential and transport disturbances?	addressed through a revised waste plan. Water infrastructure for the most part has the capacity though planned works to accommodate growth. Policy BGI1 outlines the requirement of developers to support the provision of new, and enhancement of existing green infrastructure, particularly in those places identified as deficient by the open space, sport and recreation study. Policy BT3 outlines the requirement of developments to plan for freight and servicing during and post construction.	
5.7 South West		Julian Branch	Population increase has deleterious effects for the existing residents who must endure increased congestion, pollution and pressure on local services. Sudbury residents do not want more buildings. Existing properties should be improved and more efficiently occupied. The population increase is likely to be higher than 65,000.	Housing needs related to increases in population have to be addressed through the planning system. The Council undertakes strong efforts to bring vacant properties back into use, and to use existing vacant buildings to meet our housing need, however, this will only meet a small portion of our housing targets.	No change
5.7 South West		Vanraj Chavda	Object to any more high rise buildings in Sudbury Town area. No more development without parking facilities. The 10 year housing target for Brent has already been met so why build further development.	Noted. Brent is not achieving the draft London Plan 10-year housing target. Tall buildings have been identified in the London Plan as an appropriate tool to meet the target. The Council has sought to concentrate tall buildings in smaller areas, rather than scatter them across the borough. Within Sudbury	No change

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				tall buildings will be limited to intensification corridors and town centres which have been identified as locations suitable for the development of around 5 storey buildings. This is predominantly due to the width of the roads which facilitates the accommodation of taller buildings, and the areas proximity to good public transport. The Council will support car free development within areas of high Public Transport Access Levels (PTAL) of 4 and above, subject to suitable mitigation. The objective here is to reduce congestion and increase air quality, whilst tackling climate change through the reduction in car dependency with the greater uptake of public transport.	
5.7 South West		Viv Block	According to correspondence received from STRA the figure of 24,000 homes has already been achieved so why build more? Vale Farm is a suggested site allocation for new tower blocks yet it is an officially designated sports facility and does not allow for 'change of use'.	The Council has not met the draft London Plan housing target. The Plan makes no reference to developing housing on Vale Farm, it identifies the Neighbourhood Plans' objective of creating a regional centre for Sports Excellence.	No change
5.7 South West		Hardi Kotak	Objection to proposed demolition of buildings within intensification corridors along Watford Road.	Developments within intensification corridors will be subject to the usual considerations associated with planning applications, including height and massing, character and	No change

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				the potential requirement for parking. The sites for intensification corridors have been chosen due to access to public transport and their position on wide roads so as to reduce impacts of scale. Given the scale of development required, it is inevitable that the character of some areas will change.	
5.7 South West		Valerie Gordon	Watford Road should not be an intensification corridor. It is already congested and would ruin the landscape of Vale Farm	Watford Road has been chosen due to its accessibility to public transport, the fact it is a main road and its width which can accommodate taller buildings. The Council has taken the decision to reduce the potential for significant change to the character of the borough by concentrating development in smaller more defined areas. Impacts on Vale Farm can be assessed at the time applications are submitted, however at this stage it is not considered that buildings which modestly increase height adjacent to Vale Farm will be unacceptable in principle.	No change
5.7 South West			Object to any change of use of Vale Farm and surrounding land. The land is protected for sports use only. Modernisation and enhancement of sports facilities does not require Brent Council planning permission. Brent has already met its housing	The Plan identifies the Neighbourhood Plans' objective of creating a regional centre for Sports Excellence. Modernisation of the sports facilities, if it involves any external physical work will require planning permission.	No change

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			target of 24,000 homes over 10 years.		
5.7 South West		Sudbury Town Residents' Association Forum	Over the next 10 years, 14% of the population of Sudbury Ward will be deceased and their homes would contribute to newly available dwellings.	Noted. Despite this population turnover the borough is anticipating the increase in population from births within the borough, the increasing life expectancy of residents, and migration from outside the borough.	No change
5.7 South West		Renu Kaul	Preserve the Keelers site as an existing designated industrial site with the addition of a training centre function to enhance the viability of existing the business	The site allocation is designated as mixed use, and will be required to include a commercial element on the ground floor with the aim to incur no net loss in employment floorspace. As part of the development the developer will be expected to provide training/ apprenticeships.	No change
5.7 South West		Valerie Gordon	There should be no redevelopment of Vale Farm for residential use. The focus should be on providing a sport facility of excellence	Noted. The Plan makes no reference to developing housing on Vale Farm, it identifies the Neighbourhood Plans' objective of creating a regional centre for Sports Excellence.	No change
5.7 South West		Mary Farrell	Sports Facilities as Vale Farm needs to be modernised	The current management agreement that the Council has with the operator of the centre ends in 2021. In the period leading up to this consideration will be needed on if and how improvements to the centre can be made.	No change
5.7 South West		Sudbury Town Residents'	Vale Farm is for sporting use only and is protected by STRA's Neighbourhood Plan policies LSG1	Noted. The Plan makes no reference to developing housing on Vale Farm, it identifies the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
		Association Forum	and VF1 which state that any development which is not of sport, recreational and amenity use will not be permitted.	Neighbourhood Plan's objective of creating a regional centre for Sports Excellence.	
5.7 South West		Christine Harvey	Sudbury should not be overpowered by the growth of other retail areas. Sudbury Neighbourhood Plan is important.	Noted. The Council will continue to uphold the town centre aspirations as laid out within the Sudbury Neighbourhood Plan which will be supported by additional policy as included within the draft Local Plan.	No change
5.7 South West		West London Business	There should be no residential development on Abbeydale/ Northfields West and the Alperton Central sites as they are designated industrial sites. The principle of co-location on Alperton North site is accepted, however buildings should be high quality. The public realm around intensified industrial sites must be improved to support a larger number of workers. Aging infrastructure on these sites must also be upgraded. Affordable 'move-on' space for young companies must not be forgotten in Brent.	Alperton Central and Abbeydale/ Northfields West are not included within the growth area and has not been allocated as a potential development site. It is expected that these sites will be subject to industrial intensification. Public realm improvements will be attained through the planning process where possible through S106 planning obligations. Affordable workspace is required on new developments proposing employment floorspace as outlined in local plan policies BE1 and BE3.	No change
5.7 South West		Yvette Blumberg	High rise development has had a negative impact on Wembley. Sports fields and large green spaces are needed if housing density is increased.	Noted. The housing targets for Brent will require the provision of tall buildings. Wembley has been identified as an area suitable for tall buildings. Criteria N of policy BP7 states the need for improvements to Vale Farm and its sports facilities. Policy BGI1 outlines the requirement of developers to support the	No change

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				provision of new, and enhancement of existing green infrastructure, particularly in those places identified as deficient by the open space, sport and recreation study.	
5.7 South West		Sudbury Town Residents' Association Forum	The proposed allocations of Keeler's and FM Motors are contrary to the Mayor's aim to protect industrial land. These sites should not be allocated for development and is against STRA's Neighbourhood Plan that directs development in Sudbury to be a maximum of 2-3 storeys.	The site allocation is designated as mixed use, and will be required to include a commercial element on the ground floor with the aim to incur no net loss in employment floorspace. The requirement for developments to be a maximum of 2-3 storeys is not set out within neighbourhood plan policy.	No change
5.7 South West		John Cox	Better quality seating and street furniture is needed along Wembley High Road. All unnecessary street clutter should be removed.	Noted. Criteria C of policy BP7 states the need to improve the public realm of both Wembley and Wembley park. The following is also noted in chapter 5.7.20: 'An investment in wayfinding and public realm improvements would assist in overcoming the current separation between the 'historic' town centre on the High Road and 'new' centre around the London Designer Outlet.' Again the town centre action plan should assist with improvements.	No change
5.7 South West		John Cox	Wembley Central needs greater long-term investment to prevent deterioration. New local roads may be required to alleviate traffic on Wembley High Road.	Wembley central is in the process of significant development. The town centre will have an action plan to address a wide range of matters to stop its deterioration. Small scale improvements, such as at North End Road should improve local	No change

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				resident's ability to move around on event days. Significant investment in new roads will only increase car dependency and congestion and ultimately will not be a viable option for traffic relief.	
5.7 South West		London Hotel Group	Seek allocation of a site bounded by St Johns Road, the railway line and Wembley town centre for a residential led mixed use development. Consider that the site's location in a town centre/ Growth Area near to very good public transport make it suitable for tall buildings.	This site is considered appropriate to be identified as a site allocation.	Allocate Elm Road site.
5.7 South West		Chris Neve	Vale Farm is for sporting use only. Any residential development would be a breach of covenant. Brent has reached its housing target of 24,000 homes so there should be no further development.	The Plan makes no reference to developing housing on Vale Farm, it identifies the Neighbourhood Plans' objective of creating a regional centre for Sports Excellence.	No change
5.7 South West		John Cox	Wembley High Road eastwards from Ealing Road should be an intensification corridor. Ealing Road Library should be moved to the High Road. The station square is a good attempt at regeneration but should be extended to the west.	As a town centre and an area suitable for tall buildings the potential for intensification is significant. There are no plans to extend station square to the west.	No change

DESIGN

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.1 Design	BD1	Shruti Soni	Agree with very tall buildings in Wembley Park as this has already occurred. Disagree with the 5-6 storey intensification corridors as inconsistent with adjacent single storey and 2 storey character. Needs greater consideration of right areas for this height particularly as developers likely to seek taller.	Concerns regarding heights and local character in intensification corridors noted. Heights in the corridors will nevertheless still need to consider other amenity policies which will reduce their potential for harm. Concentration allows for wider impacts on character to be more limited.	No change
6.1 Design	BD1	London Hotel Group	Seek more flexible approach to heights in the policy. Welcome identification of Wembley Growth Area as an appropriate location the height ranges are inappropriate. Factors such as exemplar design individual site's suitability are more appropriate. Also need to see proposals map tall buildings' boundary	The appropriate heights for the Wembley Park Tall Building Zone are now more flexible. Individual site's suitability for tall buildings and design elements including sustainability are included in the design criteria of the Tall Building Strategy which will also be included in the Local Plan. The appropriate heights are already subject to full suitability, so these factors would not justify additional height.	The appropriate heights for Tall Building Zones have been updated. The design criteria in the TBS for tall buildings are now expanded, these will be included in the Local Plan policy justification text.
6.1 Design	BD1	Pocket Living	Need to see on policies map the tall buildings locations. Policy should be applied with flexibility not precluding greater height where justified, this also includes in town centres and intensification corridors.	The opportunities for tall building have been reviewed borough-wide and resulted in the identified Tall Building Zones and intensification corridors. In other locations, development will	Amend policy justification to provide clarity on flexibility to 'around' 15 metres in intensification corridors and potentially greater

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Amend policy to: 'In intensification corridors and town centres outside conservation areas developments of up to around 15 metres above ground level could be acceptable, with opportunities to go up to a maximum of 18 metres above ground level if of very high design quality.'	have to respond positively to local character. The tall buildings zones shown in the Tall Buildings Strategy will be shown on the policies maps. Some flexibility will be allowed in the policy in intensification corridors with reference to 'around' 15 metres being acceptable.	heights at strategic points in town centres.
6.1 Design	BD1	Historic England	<p>Welcome draft policy, background text and tall buildings strategy. high quality design needs better definition. Wider considerations exist than local historic environment impacts, but examples might include:</p> <ul style="list-style-type: none"> • Be of a height, scale and mass that are proportionate to and in context with their local context and in keeping with their surroundings and prevailing local character; • Enhance local character and distinctiveness and avoid adverse impacts on heritage assets and their settings; • Provide high quality open space accessible to all. 	Support noted. The policy justification has been expanded to outline aspects that will be considered in determining the appropriateness of tall buildings within the borough.	Change the policy justification to identify the range of matters that will be considered in assessing appropriateness of tall buildings proposals.
6.1 Design	BD1	Canal & River Trust	Tall buildings can have a significant adverse impact on the waterways, including their attractiveness as amenity/recreation assets, ease of navigation, and ecology, e.g. canyoning effect, significant overshadowing and resultant micro-climate change impacting on species. The policy should give	Tall buildings are now restricted to Brent's Tall Building Zones. Most of these do not include waterways. Where they do the impacts of proposed buildings on their surroundings will be assessed on a case-by-case basis. The impact on	The design criteria in the Tall Buildings Strategy are now expanded and will also be included in the Local Plan policy justification.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			greater protection against the adverse impacts of tall buildings.	surrounding open space and waterways is covered by the design criteria, which will be included in the Local Plan.	
6.1 Design	BD1	Mary Farrell	Buildings are too high and feel like hutches.	The tall building policy and strategy aim to balance opportunity for tall buildings with general concerns about the impacts of overly tall buildings.	No change
6.1 Design	BD1	Martin Francis	Very high design quality' and 'positive additions to the skyline' needs defining to reduce range of interpretation and controversy. Needs some sort of neutral external body. A Local Planning Forum, involving planning officers, councillors, developers and local people to discuss more controversial issues in a non-confrontational way and without the formalies of the Planning Committee could be useful.	Brent's Tall Building Strategy sets out design criteria that tall buildings should meet. These will always allow for some flexibility in design and the necessary interpretation. Any applications for tall buildings are already subject to extensive discussions including planning officers, urban design officers, developers and frequently an external design review panel. Expanded design criteria for tall buildings can be included in the Local Plan.	Include the design criteria set out in the Tall Buildings Strategy within the policy justification.
6.1 Design	BD1	London Borough of Harrow	Support most of the policy as the definitions and approach are broadly similar to the Harrow Local Plan. Would welcome further dialogue regarding tall buildings in Town Centres and intensification corridors along the common boundaries.	Support noted. No locations along the boundary with Harrow are deemed suitable for a tall building cluster, although Northwick Park and Colindale/Burnt Oak are close. On-going dialogue will occur.	No change
6.1 Design	BD1	Christine Harvey	Heights should be restricted to avoid depressing loss of ground's sunlight and a sense of enclosure, being consistent	The tall building policy and strategy aim to balance opportunity for tall buildings with general concerns about the	The design criteria in the TBS for tall buildings are now expanded.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			with proportion, heights and architecture of buildings.	impacts of overly tall buildings. The impacts of tall buildings on overshadowing of public spaces are covered by the design criteria, which relate to the design of open/ amenity space and also the range of issues to be addressed in the policy justification for tall buildings in the Local Plan.	These will be included in the Local Plan.
6.1 Design	BD1	Elizabeth Lindsay	High rise not environmentally friendly. Subject to effects of too much sun, use twice as much energy and concrete is 10 x carbon intensive than wood. High rise increase isolation and alienation. High rise increase profits for developers and tend to have luxury units, this gentrification/ social cleansing displaces lower income renters reducing socio economic diversity. Reduction of natural light. Fire hazards. Soulless. Less green spaces. Reduced wildlife	The tall building policy and strategy aim to balance opportunity for tall buildings with general concerns about the impacts of overly tall buildings. The negative impacts of many tall buildings mentioned are recognised and covered by the design criteria, which will be included in the Local Plan.	The design criteria in the Tall Buildings Strategy have been expanded and are included in policy justification for the tall Buildings policy in Local Plan.
6.1 Design	BD1	Neil Zussman	Inconsistent with other aims as will block sunlight/ overshadow large areas for example the canal and also appear unwelcoming.	The tall building policy and strategy aim to balance opportunity for tall buildings with general concerns about the impacts of overly tall buildings. The impacts of tall buildings on overshadowing of public spaces and waterways are covered by the design criteria, which will be included in the Local Plan.	The design criteria in the Tall Buildings Strategy for considering tall buildings are now expanded. These will be included in the Local Plan tall buildings policy justification.
6.1 Design	BD1	Francesca Severn	Support tall buildings restriction to areas with good public transport but not	Support noted. The visual impacts and air pollution impacts	The design criteria in the Tall Buildings

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			"estates" of them. Unless roads are very wide due to car fumes concentration and feeling overbearing 3-4 storeys max preferred on intensification corridors.	are part of tall building criteria, which will be included in the Local Plan. Tall buildings have only been identified as suitable within limited zones. In the rest of the borough, new development will need to be complementary to existing character, including heights.	Strategy for assessing tall buildings have been expanded and are also included in the Local Plan policy justification.
6.1 Design	BD1	Sam Dillway-Davies	Support tall buildings proposal. Need to include larger balconies and covered space for bicycles/buggies/outdoor items too bulky or heavy to be taken upstairs.	Support noted. Minimum balcony sizes and bicycle parking standards are covered by the London Plan and supported by Brent.	No change
6.1 Design	BD1	Wendy Martin	Proved in 1960's / 1970's that tall buildings are not 'families with young children' friendly unlike lower rise buildings with green spaces which are better for all.	Noted. Tall buildings will provide some of, but not most of the borough's new housing. Design solutions in tall buildings now better address amenity standards on upper levels, e.g. podiums or roofs which allow direct access for families to amenity space.	No change
6.1 Design	BD1	David Pearson	North west: Will destroy character as has occurred around Wembley Stadium.	The Tall Building Strategy and policy BD1 aim to minimise the impact of tall buildings. Wembley Stadium will remain the largest, tallest and most dense area of the borough.	No change
6.1 Design	BD1	Mary Duffy	Don't make them very high rise! Need to be set back a bit from main roads. Promote brickwork façades blending in with the existing.	The tall building policy and strategy aim to balance opportunity for tall buildings with general concerns about the impacts of overly tall buildings.	The design criteria in the Tall Buildings Study for tall buildings are now expanded and included

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				Setting tall buildings back from main roads will be different from place to place largely related to impacts on characters.	in the Local Plan policy justification.
6.1 Design	BD1	United College Group	30m is too low in relation to allocated sites. A specific tall building approach should be set out for Wembley Park where a number of buildings are 60m+ which should be reflected within Preferred Policy BD1.	Wembley Park has been identified as a Tall Building Zone and appropriate heights are identified and these are above 30m, taking the height of the tallest buildings currently with permission and stepping down towards the edges of the Tall Building Zone. Policy BD1 refers to the Strategy and the appropriate heights within it.	No change
6.1 Design	BD1	Philip Grant	Some of this section is nonsense. Brent has allowed the construction of many buildings higher than 20 storeys, despite lower height policies. This has undermined confidence in the planning process and increased scepticism of adherence to new policy limits.	Previously with the exception of Wembley in policy making terms there had been little consideration of where taller buildings would be more appropriate. The draft Local Plan seeks to overcome this. Notwithstanding height parameters set, these can in most cases never be regarded as a fix. The appropriate height will ultimately come down to what harm the additional storeys would create and may also have to be balanced up with a number of factors including additional affordable housing provision that can be achieved, etc.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.1 Design	BD1	St George	Tall buildings have been deemed acceptable due to good design and an appropriate consideration of the surrounding area at Grand Union (former Northfields). Welcome the strategy's inclusion of this site as appropriate for tall buildings. The policy should allow flexibility for tall buildings outside designated areas, e.g. sites to the south west of Northfields.	Going forward, the strategy is to minimise the impact of tall buildings through the use of tall building clusters. The existing and emerging cluster of Alperton West is identified as a suitable Tall Building Zone. The industrial area to the South of the Grand Union canal is a designated Strategic Industrial Location (SIL) which needs to remain industrial. Therefore, a tall building cluster is not suitable at this location.	No change
6.1 Design	BD1	Renu Kaul	Harrow Road, Bridgewater Road, Watford Road intensification corridors and Sudbury Town Centre must be 2-3 storey ONLY as stated in the Sudbury Neighbourhood Plan.	There are no policies in the Sudbury Neighbourhood Plan to that effect.	No change
6.1 Design	BD1	Greater London Authority (GLA)	Policy welcomed. Tall buildings should only be supported in sustainable locations consistent with Draft London Plan Policy D2. Limiting building heights to between 15-18m in intensification corridors and town centres is restrictive, exceptions should be provided to allow for example, optimisation of land in appropriate locations, navigation through the city or emphasising a hierarchy of spaces. Appropriate locations of tall buildings should be illustrated in associated places maps.	Support noted. The intensification corridors have not been identified as suitable to support very tall buildings. These are only identified for some of Brent's Tall Building Zones. The policy will be amended to add potential for flexibility where it can be justified in town centres, or exceptional circumstances. This however should not be seen as a message that any location is likely to be appropriate. The Strategy is seeking to cluster buildings and has provided a	Amend tall buildings policy to allow for some flexibility in exceptional circumstances where supported by appropriate evidence.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				large number of potential locations to accommodate many tall buildings.	
6.1 Design	BD1	Apartments for London, Wembley Towers Limited (owners of Wembley Point and surrounding land), Stonebridge Real Estate Development Ltd (Unisys site owner)	<p>Can only be responded to in detail once the general locations for suitable tall buildings are identified. Should allow densification through high quality design via tall buildings subject to a range of criteria such as:</p> <ul style="list-style-type: none"> - Accessible locations; - Microclimatic effects; - Local character and land uses; - Existing and planned accessibility and connectivity; - Capacity of surrounding infrastructure; - Design quality. <p>Reference to 'exceptional' circumstances should be removed. 'Other circumstances' for acceptability could be set out in criterion such as making a positive addition to the skyline. Requirement to have to include uses of a civic and cultural importance should be deleted.</p>	<p>Wembley Point and surrounding area has been included as a Tall Building Zone, appropriate for tall buildings, subject to stepping down to surrounding low-rise. The Tall Building Strategy sets out design criteria which do include those mentioned. These will be included in the Local Plan policy justification.</p> <p>The reference to exceptional circumstances refers to heights in intensification corridors only. Positive addition to the skyline is highly subjective, hence Brent has already undertaken the assessment of where tall buildings are deemed appropriate and to which heights, providing clarity to developers and those assessing applications, as required by the London Plan.</p>	The design criteria in the Tall Buildings Strategy have been expanded and are included in the Local Plan's policy justification.
6.1 Design	BD1	Environment Agency	<p>Recommend addition of an additional height restriction directly adjacent to watercourses due to detrimental impacts on ecological value through increased shading. It will also require greater than the standard 8 metre buffer adjacent to a watercourse depending on the height of the proposed building. If not possible,</p>	<p>The impacts of tall buildings on overshadowing of waterways are covered by the design criteria, which will be included in the Local Plan. A sentence can also be added to the Wembley Park search area text in the Tall Building Strategy to cover this</p>	The design criteria in the Tall Buildings Strategy are now expanded and are also included in the Local Plan policy justification. Included the following sentence in the

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			<p>shading or encroachment impacts must be mitigated for, either on the site or elsewhere. BCSA4: FIFTH WAY/EURO CAR PARTS appears to better consider this issue.</p> <p>Wembley Growth Area Needs prioritisation of tallest buildings away from the Wealdstone Brook with possible height restrictions on sites adjacent to it, and extra set back provision from the top of the watercourse bank.</p>	<p>issue. Building heights were already required to be of a scale complementary to the adjoining areas towards the edge of the Tall Building Zone, roughly around the Wealdstone Brook. Policy BG11 also covers the impacts of development on watercourses.</p>	<p>Wembley Park search area text in the Tall Building Strategy: "Waterside development should be sufficiently set back and avoid overshadowing of the watercourse".</p>
6.1 Design	BD1	HGH Consulting (on behalf of unnamed clients)	<p>Generally, support the policy. No artificial limits should be set in and out of areas identified if buildings are high quality design and optimise a site's development potential.</p>	<p>Support noted. The London Plan requires the identification of any locations suitable for tall buildings and their appropriate heights, which is what the Tall Building Strategy and policy BD1 do.</p>	<p>No change</p>
6.1 Design	BD1	Quintain	<p>Object to policy. Disagree with local tall building definition it should not be setting maximums without a more robust evidence base in place including full view analysis and townscape/heritage assessments. This will allow the policy to include assessment criteria. Also reserve comments until locations for tall buildings are shown on the proposals map.</p> <p>'Appropriate levels' needs definition. Object to draft Tall Buildings Strategy. Requires further work as is not a sound evidence base. Tavernor Consulting's review concludes:</p>	<p>The tall building definition is already Brent's adopted policy and matches that of the London Plan and is considered the most useful simple definition. The Tall Building Strategy (TBS) now includes further analysis and design criteria. These criteria will be included in the Local Plan policy justification. The appropriate heights are outlined in the TBS.</p> <p>i. 3d views are now included for each search area. ii. The strategy is to cluster tall</p>	<p>The Tall Building Strategy (TBS) now features expanded analysis for the search areas. The design criteria in the TBS for tall buildings are now expanded. These will be included in the Local Plan policy justification.</p>

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			<p>i. A views assessment is recommended to guide tall development in the area and inform the stipulation of appropriate heights. This would include an understanding of potential impacts on the skyline, as perceived at certain key points, and would provide an opportunity to shape the future skyline as part of a plan-led tall building strategy. Ideally this would be borough wide, but could also be undertaken by area. The view locations and visual strategy could then be used in the assessment of tall development applications coming forward.</p> <p>ii. A townscape and heritage assessment is also recommended to be undertaken of the areas identified where height may be possible (due to PTAL ratings and visual impact analysis). Such an assessment would identify key junctions or other townscape 'nodes', potential means of improving townscape character and a sense of place, heritage assets which should be of key consideration.</p> <p>iii. The analysis in the Draft Strategy demonstrates that the methodology and criteria of a tall building strategy must inevitably be applied flexibly and will vary from location to location. Consequently, it is recommended that, within areas designated as potentially suitable for tall development, that heights are considered against key principles of development set out for each Area.</p>	<p>buildings together to minimise impact and harm. Spreading them out on junctions would increase the visual impact instead of retain or improve townscape character and sense of place.</p> <p>iii. Appropriate heights are identified for each Tall Building Zone and tall building applications will be considered against the expanded design criteria.</p> <p>iv. The TBS has identified the most appropriate areas for tall building clusters, which will allow for changes of scale and character and will by definition be different in character to the areas surrounding it.</p>	

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			<p>iv. The Draft Strategy describes “areas of two storey housing” as being “the most common character within Brent” (p.5). It is also noted that the Local Plan requires the scale and character of parts of Brent to change if more housing is to be created. The Plan acknowledges that this will result in areas “with a different character to the adjoining suburban areas” (3.1.12). At present, planning policy encourages that this need is met by concentrating new development in locations of least sensitivity (e.g. in terms of heritage, views, open space) and where there is an existing or emerging appropriate level of amenity to support greater density (e.g. public transport, but also shops, services, community networks). In Brent, like the rest of London, some of these appropriate locations may also be characterised by an existing lower scale of development. In its present form, the Draft Strategy does not appear to allow for this change of scale and character in certain appropriate places. The appropriate heights identified, particularly in designated Growth Areas, also appear to lack a clear urban rationale. Please refer to Appendix 1 for proposed text changes.</p>		
6.1 Design	BD1	Amafhh Investments Ltd	<p>Support principle of Policy BD1. The appropriate locations shown on the proposals map should ensure that Staples Corner Growth Area/SIL.</p>	<p>We will include reference to the BXC scheme and heights in the Tall Building Strategy. However, the fact that a super-tall building</p>	<p>Include reference in the Tall Building Strategy to tall building cluster up to 100m in Barnet.</p>

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			<p>Regard should be had to approved tall buildings within Brent Cross Cricklewood (BXC) regeneration area, where a cluster of a dozen buildings of up to 100 metres in height and 250 metres from Brent benefit from outline planning approval. This makes it appropriate for taller buildings (of up to 100 metres) within Staples Corner (particularly fronting Edgware Road). Also needs flexibility; judging tall buildings above recommended levels on their individual merits/ benefits offered.</p>	<p>cluster has been consented east of the railway lines doesn't mean that these heights should be copied for a separate cluster to the west of Edgware Road. We will increase the upper appropriate heights to 15 storeys (45m), which will be most appropriate near Edgware Road.</p>	<p>Increase appropriate building heights to 15 storeys.</p>
6.1 Design	BD1-2	Kishan Vekaria	<p>Intensification corridors: Agree with Willesden Lane and Dudden Hill capped at a maximum of 5 storeys. Willesden Lane ground floors should only focus on residential use, Dudden Hill should be retail.</p> <p>Tall buildings historically problematic, out of character with poor amenity space/ environment created. New lower rise solutions delivered at South Kilburn more appropriate.</p> <p>Gambling and fast food should be more stringent capping floorspace ratio in centres. Policy should set minimum distances of both gambling and fast food shops to ANY education establishment.</p> <p>Phone boxes : Now associated with anti-social behaviour in Willesden Green, need replacing with connection hubs</p> <p>Derelict places : should be made available for art to local artists or local school children</p>	<p>The ground floor uses suggested would be appropriate, although for Dudden Hill much retail may be difficult to sustain and other commercial, or residential uses might be appropriate.</p> <p>New tall buildings are necessary to meet development targets and will require high implementation standards.</p> <p>The policy on 'anti-social' uses is considered to represent a balance between protecting amenity and commercial interests.</p> <p>New permitted development rules will reduce the addition of unnecessary phone boxes. It will not however impact on those that currently exist.</p> <p>Meanwhile uses are supported in the Plan.</p>	<p>No change</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>Willesden Green Conservation area: Increase in size more than the proposal indicates, include the whole area between the train line and the High Road and create a specific design guide. Oblige retailers and landlords when refurbishing to remove redundant façade wiring and decaying structures Coffee shops terraces: Support and Willesden Green would benefit from lower charges to outside terraces to help street animation Victorian terraces: Protect with clear extensions, loft conversions and front garden alterations design guidance even outside a Conservation Area. Empty properties time limit: set a maximum period in policy with penalties thereafter. Retail : shouldn't be used as storage units Willesden Lane/ Walm Lane crossing : gateway marred by traffic accidents needs improvements and to be pedestrian friendly with railings removed, safe crossing points and lower speed zones</p>	<p>This will be considered as part of a separate consultation exercise associated with conservation area designation. Planning has limited powers to address cabling, etc. Incentives for coffee shop terraces are a matter that can be addressed in the Town Centre Action Plan. It is not a planning matter. SPD1 and SPD2 provide design advice that seeks to ensure sympathetic development occurs. Additional Council tax applies to empty properties and the Council does try to encourage/ make owners re-use properties where vacant for some time. Where an unauthorised change of use has occurred this can be reported to the Council's planning enforcement team to address. Improvements to public realm around Willesden Green station are on-going within a context of limited funds available for capital works.</p>	
6.1 Design	BD1-2	TfL Commercial Development	Support flexible approach to determining appropriate development heights using a design-led approach, which responds to context on a site by site basis rather than set heights. In terms of exceptional	Brent has identified the suitable locations for tall buildings as Tall Building Zones. In the rest of the borough, new development will need to respond positively to	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			circumstances the requirement for the building to be of a civic or cultural importance is overly specific and restrictive undermining provision of tall buildings in suitable locations.	existing character, including heights, as supported. The reference to exceptional circumstances seeks to allow some flexibility for important buildings that would otherwise not be supported. The Council considers that it provides enough opportunities for tall buildings to be provided in Brent to meet market demands/ needs within the areas that it has identified. Positive addition to the skyline is highly subjective, hence Brent has already undertaken the assessment of where tall buildings are deemed appropriate and to which heights, providing clarity to developers and those assessing applications, as required by London Plan policy D8.	
6.1 Design	BD1-2	Kevin Barry	Design needs to be brave and innovative	This can be interpreted in different ways, not necessarily positive. Positive designs that meet all relevant policy and guidance will be supported.	No change
6.1 Design	BD1-2	Elayne Coakes	Ensure new shop frontages comply with SPD - needs more pro-active enforcement than reliance on local populace. Support 5 storeys for high streets. Ensure new developments are sustainable , right type of windows,	Support for Brent's various policies noted. Agree that implementation of policies and guidance is essential.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>green roofs and other environmental features that have suitable maintenance regimes</p> <p>Ensure local communities are well consulted - connect with all the local groups, don't just take the developers' word that they have consulted.</p> <p>Keep the building materials sympathetic to existing infrastructure</p>		
6.1 Design	6.1.11	Greater London Authority (GLA)	<p>While Brent's ambition to optimise the use of land is welcome where buildings over 45m exist, the visual, functional, environmental and cumulative impacts should be taken into account consistent with Draft London Plan Policy D8.</p>	<p>The tall buildings study has considered at a macro-level the appropriate location for tall buildings. It identifies the height of existing or permitted developments over 45 metres that it considers would normally represent the height that the borough would be comfortable granting consent for subject to satisfactorily addressing planning policy requirements.</p>	No change
6.1 Design	6.1.12		<p>Many intensification corridors are very controversial, not taking account of the existing context. Loss of residents amenity will be immeasurable, resulting in development 3 times or more the size of existing.</p>	<p>This is noted. Development requirements to meet London Plan targets will necessitate a change in character of some parts of Brent. A focus on a smaller number of areas is considered the most appropriate approach.</p>	No change
6.1 Design	BD2	Kensal Rise Residents' Association	<p>Needs to include build phase conduct requirements through which neighbours can challenge any potential antisocial consequences, e.g. noise, spoil removal and length of works</p>	<p>Appropriate conditions can address planning matters. Non-planning matters must be addressed by relevant parts of</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				the council who have enforcement teams for nuisance.	
6.1 Design	BD2	Ruth Dar	Ideally no basements. Protection of structure. Party wall not robust enough.	Noted. Not allowing any basements is inappropriate. Planning matters cannot address matters addressed by other legislation.	No change
6.1 Design	BD2	Sam Dillaway-Davies	Support basement development.	Noted.	No change
6.1 Design	BD2	Ruth Dar	Should be banned, else desirable for greater limits, restricting the dig to less than the footprint of the house. Longer term structural effects not addressed through the Party Wall Act Wider need consideration. This is also true of mud and other on street detritus washed into and blocking sewers.	Permitted development essentially allows basement development of the footprint. The other matters are dealt with through other legislation/enforcement procedures and as such are beyond what planning can reasonably be expected to control.	No change
6.1 Design	BD2	Stephen Carter	Digging of basements should be banned. Usually unnecessary, damage other neighbouring structures, cause disruption in construction. It is an anti-social trend.	Banning would be inappropriate and unjustified. Safeguards exist to protect existing structures through party wall act if this is followed through correctly. Whilst construction may cause disturbance/disruption, this is usually temporary and limited.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.1 Design	BD2	Thames Water	Subterranean development increases the susceptibility to sewer flooding. A policy requirement for a suitable pumped device will mitigate this risk.	Noted. This is a building control matter.	No change
6.1 Design	BD2	Historic England	Necessary assessments must accompany applications expected to cause harm to an archaeological heritage asset. Where harm is of high significance, designs should be altered to ensure the heritage asset's preservation.	Noted. This is consistent with national policy and as such will be taken into account in the assessment of planning applications.	No change
6.1 Design		Rita Valentini	New development in East is of nice design	Noted.	No change
6.1 Design		Wendy Martin	Need more sympathetic designs in keeping with character, e.g. brick, rather than contemporary render/ bright colours.	SPD1 Brent Design supports this approach and more detail on how it can be achieved.	No change
6.1 Design		Annika McQueen	Use design to avoid opportunities for crime or anti-social behaviour. Consider how buildings will age e.g. render Vs brick and whether post Grenfell cladding is appropriate on high-rise buildings.	This is identified in SPD1 Brent Design Guide and informs the layout/ features of development proposals. SPD1 promotes design and materials that will endure.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.1 Design		Shruti Soni	<p>Car park heights and areas need to accommodate delivery vans and Uber. Deliveries and taxis are a key source of additional traffic in car free developments.</p> <p>Some intensification corridors have beauty due to existing building styles harmony. Here emphasis should be on harmonising building style rather than the random.</p> <p>Tall buildings require high architectural quality to avoid similar mistakes of 1960s.</p>	<p>Heights are appropriate for the vehicles entering the places. It is recognised that car-free does not mean that no traffic is generated. Deliveries are however mostly undertaken at off-peak hours when pressure on the highway network is less severe.</p> <p>A design guide will provide advice on development within intensification corridors.</p> <p>Agreed. The appropriateness of the design will be considered through the determination of the planning application.</p>	No change
6.1 Design		Eileen Inkson	<p>Encourage cycle use through provision of shelters and storage. Encourage recycling with composters and eco-friendly systems rewarded.</p> <p>Discourage cars through no parking built into plans.</p>	<p>Cycle use is encouraged through London Plan and Brent Local Plan cycle parking/ provision standards and guidance.</p> <p>Composters and eco-friendly systems were previously encouraged through the Code for Sustainable Homes which Government declared could no longer be required by Councils. The Council seeks to reduce unnecessary car parking provision through the use of maximum standards and wherever possible encourages car free development.</p>	No change
6.1 Design		Elizabeth Lindsay	<p>Greener' construction rather than concrete and steel is required.</p>	<p>This is a complicated area as materials with high levels of</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				embodied energy can often reduce heating and cooling requirements of occupants and have higher levels of recycling. As such a whole life cycle understanding of environmental impacts of building materials/ construction techniques is required. London Plan policy guidance is moving towards encouraging fuller consideration of this issue.	
6.1 Design		Rachelle Lennard	Document gives positive vision but uncertain of extent to which residents' opinions will change the Plans.	Noted. Where comments are supported with reasoned justification that provides a persuasive argument why change is necessary its influence will be greater than that which is not.	No change
6.1 Design		Neil Zussman	Don't cut costs. 243 Ealing Road is currently an eye-sore due to barriers put up to prevent falling glass from balconies. Obvious solution don't use cheap materials.	Usually registered providers (who developed this scheme) and retain a long term interest in a development have a whole life approach to a building which ensures the use of good quality materials. Brent's design guide seeks the use of high quality materials.	No change
6.1 Design		Veenay Chheda	No new tall buildings as there is no capacity for the population. Ensure no over-spill car parking through appropriate provision in new development.	The Council has to Plan to meet housing needs and to provide the capacity on identified sites to do this will have to allow tall buildings. Car parking provision balances	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				up the need to protect existing residents' amenity with efficient use of land and ensuring that unnecessary use of the car is not encouraged.	
6.1 Design		North Brent Parks and Neighbourhood Forum	Design solutions such as flat roofs and render are not appropriate, as they are either technically or aesthetically high maintenance. Brick fascia and roofs with incline are more robust and will endure. Support provision of green infrastructure in development such as on Brook Avenue and encourage the collection, storage and of rain-water to reduce run-off and improve water quality.	Noted. The SPD1 document seeks to ensure robust design with sympathetic materials that add positively to character and endure for long periods. Noted.	No change
6.1 Design		Andy Brommage	Only allow architect designed projects commissioned by the client & not by a design & build contractor. Have a body that oversees design quality e.g. local architects that see the planning applications & can comment.	SPD1 seeks to ensure the involvement of an architect in the early and latter stages of a building's development. In some cases the Council has sought to ensure continuation of the architect's involvement through S106 obligations where it has potential concerns about the quality of the building being diminished through the procurement of design and build. The Council uses CABE to assess schemes, the alternative of a local architects forum was not considered viable in terms of time/ resources to support and may have led to conflicts of interest.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.1 Design		OPDC	Welcome avoiding repetition of emerging London Plan policies	Noted.	No change
6.1 Design		Sport England	Design of where communities live and work is key to keeping people active. Place making should make the active choice easy. Sport England/Public Health England guidance 'Active Design' provides a template to inform urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. It has 10 principles which in moving forward should be drawn out in the Local Plan through their clear reference and inclusion in place and site policies.	SPD1 Brent Design includes reference to Active Design and its incorporation into street design/ public realm, buildings, etc.	No change
6.1 Design		Alison Hopkins	Stop building blandness: tower blocks of boxy brick with no character = high rise slums in a decade or less. Learn from good real regeneration schemes, homes for long term use by families. Green roofs and gardens!	Inclusion of green roofs and gardens, plus provision of family housing are guiding the content of existing design guidance and proposed Local Plan policy.	No change
6.1 Design		HUDU/ Brent CCG	No reference in design section to its role in improving mental and physical health and wellbeing. Also similarly missed by the Brent Design Guide. Appendix 2 shows links between the SPD and the draft London Plan Policy D4 which NHS London CCGs/HUDU have sought to improve by seeking better reference health. Suggest DMP1 is amended as set out in the response to that policy. Welcome Healthy Streets standards inclusion within the Preferred Options,	The amendments to DMP1 have been considered in relation to that policy and will not change as a result of this representation. The inclusion of an overall policy means that it still has to be considered, even if not specifically addressed in the site specific policy. The matters related to age, dementia and healthy places are best dealt with in any update of SPD1.	No change

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			<p>but needs reviewing for its consistency of application in the site allocations and places.</p> <p>'Age friendly' or 'dementia friendly' environments and 'healthy places or neighbourhoods' also require incorporation as a more inclusive approach than relying on healthy streets alone.</p>		
6.1 Design		Renu Kaul	<p>Promote alternative energy – solar power. Ensure all buildings are insulated to the highest standards.</p> <p>Architecture, bricks, colours, windows and frontages should remain in keeping to surroundings. Avoid harsh colours/modern designs detracting from the South West place's historical and heritage sites and beauty.</p>	<p>London Plan policy requires Carbon Zero development and an emphasis on reducing the need for energy through insulation, etc. and prioritising renewables on site.</p> <p>SPD1 Brent Design supports this approach and more detail on how it can be achieved.</p>	No change

HOUSING

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.2 Housing	6.2.8	St George	The government has redefined affordable housing needs to include people who can afford to rent, but not to buy. Therefore build to rent products should contribute toward affordable housing.	Within Build to Rent it is accepted that a different approach to affordable accommodation is likely to be required to that of prioritising provision by a registered provider. Nevertheless, within this sector, the rental levels will still have to be agreed to be at affordable level, whilst potentially being managed by the same provider as the market rented dwellings.	No change
6.2 Housing	6.2.12	Greater London Authority (GLA)	Should be amended to reflect Draft London Plan at Policy H12 which encourages guidance on social and affordable rented homes sizes to ensure affordable housing meets identified needs. Policy H12A should also be cross-referenced to ensure appropriate size mixes on individual schemes.	It is accepted that it is the market element of conventional housing that the London Plan policy seeks to ensure boroughs do not set prescriptive targets on dwelling size. The section makes adequate reference to the London Plan policies.	It is proposed to keep the policy as is and also include a table that outlines the size by tenure needs of the borough based on the Brent Strategic Housing Market Assessment.
6.2 Housing	6.2.17	Greater London Authority (GLA)	Should be amended to take account of Draft London Plan Policy H2 which will allow small housing development and small home builders to contribute a far greater housing delivery role over the plan period.	The Council does not object to the increased emphasis on small housing developments helping to address housing needs, only the London Plan's over-inflated assumptions about how many dwellings from this source should be included in Brent's deliverable housing target.	No change

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6.2 Housing	6.2.18	Greater London Authority (GLA)	Should be amended to take account of Draft London Plan Policy H3 and the 1:1 ratio of C2 older people's accommodation.	It is agreed that provision of such homes would be off-set against the borough's housing target. The one to one provision however is a monitoring matter which is clearly set out in the London Plan.	No change
6.2 Housing	6.2.18	Manjul Shah, Mitesh Mashru	We are keen to consider how the provision of affordable housing for older and care needs could be integrated with the development of community buildings, such as community centres, places of workshop and other community facilities which can provide support to people beyond their residential accommodation.	Noted. The Council would welcome discussion on this matter.	No change
6.2 Housing	6.2.19	Greater London Authority (GLA)	Brent's Strategic Housing Market Assessment Update 2018 does not include student housing need. It not clear if the 20% student cap in Wembley will allow sufficient provision to meet local and strategic student population needs over the plan period. Brent should take a more proactive approach for new Purpose Built Student Accommodation to contribute to meeting the strategic need for 3,500 PBSA bed spaces annually across London (paragraph 4.17.2).	Brent has only a very small higher education campus which has student accommodation. The consultants undertaking the SHMA considered that the needs generally from the existing population would be related to London institutions for which in nearly all cases Brent students would likely live at home in nearly all cases. Provision of spaces in Brent has almost wholly resulted from demand from students studying at central London locations. Without a full detailed analysis of the whole of London (which the GLA should realistically undertake rather than individual	Amend BH7 to remove reference to the 20% student cap in Growth Areas.

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				boroughs) it will be very difficult for any borough to specifically identify needs arising/ an acceptable target to ensure meeting these needs. Nevertheless, after further consideration, the 20% cap will be removed from policy to potentially allow greater flexibility for student providers to locate in the borough.	
6.2 Housing	6.2.19	Quintain	A full review of the student bed space figures needs is required. Existing unimplemented student accommodation consents plus increases in residential capacity at Wembley Park will impact on acceptable student bed space figures. Policy BH7 is unclear the wording could imply 20% of the cumulative population of all the Growth Areas.	Taking account of emerging London Plan policy on student accommodation policy BH7 will be amended to remove reference to the threshold and other aspects such as named institutions prior to permission.	Amend Policy BH7 to remove references to student accommodation which can be addressed through draft London Plan policy H17.
6.2 Housing	6.2.19	Quintain	A full review of the student bed space figures needs is required. Existing unimplemented student accommodation consents plus increases in residential capacity at Wembley Park will impact on acceptable student bed space figures. Policy BH7 is unclear the wording could imply 20% of the cumulative population of all the Growth Areas.	This work is being done when considering new applications. This is a fair point and it is agreed the wording could be improved. However taking account of comments elsewhere the 20% requirement has been removed from policy.	No change.
6.2 Housing	6.2.23	Greater London Authority (GLA)	Brent should be identifying and exploring opportunities for new gypsy and traveller pitches,	The Council needs clarity on whether the target for the borough is consistent with the Mayor's	No change

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			which is currently absent, through its site allocations to meet the identified need. A collaborative approach may go some way in addressing the identified West London Alliance need at a cross borough level.	definition, or the Government's definition which will be resolved through the London Plan EIP process. The GLA simply has not considered the full impact of the combination of all its policies to accommodate large increases of many different types of development in the borough, having only focussed on housing. Travellers sites are extremely difficult to deliver due to land requirements, funding limitations and reactions of existing communities which makes decision making extremely sensitive. The Council realistically will only deliver sites in places such as Growth Areas, which is what its policy starts to seek to address. Work on specific sites will commence once the requirement figure is clarified.	
6.2 Housing	BH1	Veenay Chheda	Not supported. Don't create more Brent ghettos	The amount of homes identified is required to meet Brent's and some of wider London's housing needs. The design and social mix of new housing developments will be such that they do not create future 'ghettos'.	No change
6.2 Housing	BH1	Quintain	Noted that this Policy is not consistent with the London Plan Target nor the OAN methodology.	The Council does not regard the draft London Plan target as achievable due to the lack of evidence to support the very large	No change

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				<p>increase in small housing sites delivery that it identifies. OAN is the starting point for a delivery target, the likely availability of sites to deliver homes to meet the need is the largest determinant of the achievable target that can be set. The Council has clearly identified the capacity of the sites it considers appropriate. If it can be shown that sites it has not considered can reasonably provide additional capacity for homes, then these will be identified and added to the deliverable target.</p>	
6.2 Housing	BH1	HUDU/ Brent CCG	<p>Policy BH1 represents just over 80% of the Mayor's 29,150 target in the new draft London Plan. The NHS and partners have the challenge of ensuring that their infrastructure and service capacity is accessible and delivered alongside the new populations. Keen to work with the Council ensuring provision of the additional capacity and investment to meet this growth. There should be reference to planning permissions being dependent on securing the necessary infrastructure to support the growth. We suggest under Section 7 that a new policy</p>	<p>Noted. The Council will seek to work with HUDU/ Brent CCG and others in relation to the provision of suitable infrastructure. Much infrastructure provision is not within the gift of either the Council or the developer to deliver. Whilst every attempt will be made to ensure adequate and timely provision of infrastructure, the Council will not unnecessarily hold back implementation of development unless it is evident that the harm created by its lack of provision is so great that it makes the development impacts unacceptable.</p>	No change

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			could help deliver the necessary social infrastructure.		
6.2 Housing	BH1	St George	Notes the housing targets set out in the draft policy do not accord with the housing targets proposed by the draft London Plan. Examination of the draft London Plan so it will become clear whether the GLA's proposed housing targets will be carried forward for adoption. If this is the case, understanding how the LBB will deliver these higher housing targets through its draft Local Plan will be welcomed.	The Council has put forward what it considers to be on the likely availability of sites a potentially achievable target. It is clear that the London Plan relies to a very large extent on small sites. If the EIP process finds that Brent's target is justified, then the Council will accordingly adjust its assumptions for delivery from small sites. This will make up any shortfall.	No change
6.2 Housing	BH1	London Borough of Harrow	Harrow notes that the proposed ten-year target is below the draft London Plan target of 29,159 homes for Brent. Similarly to Brent, LB Harrow has also objected to the small sites' target.	Noted. The Council together with Harrow and the other West London Authorities have worked together to challenge the small sites target at the London Plan examination.	No change
6.2 Housing	BH1	OPDC	An appropriate and deliverable annual housing target figure should be included within the policy wording to allow monitoring of delivery.	The housing delivery trajectory is set out in the monitoring section.	No change
6.2 Housing	BH1	OPDC	In accordance with the National Planning Practice Guidance, justification text should set out an indicative housing supply, i.e.: 0 to 5 years, 6 to 10 years and beyond within justification text to policy BH1.	The housing delivery trajectory is set out in the monitoring section.	No change

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6.2 Housing	BH1	HGH Consulting (on behalf of unnamed clients)	Support and the Council's ambitions to maximise the opportunities for additional homes to 2041 and beyond. Especially important that housing delivery and densities are optimised on all suitable, available and accessible brownfield sites with high density developments at appropriate locations.	The Plan seeks to maximise these outcomes.	No change
6.2 Housing	BH1 & 2	TfL Commercial Development	Policy BH1 supports the provision of homes in Growth Areas, site allocations and appropriate windfall sites. TfL CD considers that "transport hubs and sites with high public transport accessibility" should also be stated as sites capable of supporting new homes, as required by Draft London Plan Policy H1. Similarly, Policy BH2 should also identify transport hubs and areas with high PTAL as locations where the provision of additional homes will be supported. This is noted in the justification for this policy at Paragraph 6.2.37, but not explicitly referenced in the policy wording.	This is not considered necessary as Brent Local Plan does not need to repeat London Plan policies. The site allocations, town centres/intensification corridors and areas for tall buildings as preferred locations for development are consistent with the broad principle of providing additional development in areas with good access to public transport, with the additional assessment of character taken account of.	No change
6.2 Housing	6.2.27	Greater London Authority (GLA)	Brent exceeded the draft London Plan's small sites target in 2017/18, approving 1,238 net	This information is incorrect and in any case is not consistent with realistic delivery levels reflected in	No change

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			new homes, as such the Mayor consider Brent's target realistic.	past completions. An independent assessment of small sites potential delivery/ appropriate target for Brent indicates a much lower target is only likely to be achieved. The London Plan EIP inspectors appear to consider borough estimates more reliable than the GLA numbers.	
6.2 Housing	BH2	Veenay Chheda	Impractical - prioritise areas outside Brent.	This is not a viable option. The existing population of Brent creates much of the additional need for homes and Brent will also play a significant role in assisting the Greater London area meet its housing need for which the Mayor has set significant targets.	No change
6.2 Housing	BH2	Greater London Authority (GLA)	The new London Plan housing target will be confirmed by the time Brent's plan is at Examination. As such Brent should identify sufficient sites for delivery of this target to be in general conformity with the London Plan.	As the Council wants the Plan to be found sound, it will seek to achieve any adopted London Plan target. Given that the EIP inspectors have asked the GLA to consider the WLA's evidence based target for small sites delivery, the Council will await the outcome of the Inspectors' report/ Mayor's response. Any shortfall in targets currently is down to a difference in what both parties consider can reasonably be achieved on small sites. As such the Council will simply amend its small site capacity to that	If necessary, amend the small sites target to a higher figure consistent with the London Plan that will be adopted.

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				assumed in the future adopted London Plan.	
6.2 Housing	BH2	London Borough of Harrow	Support identification of locations for housing growth but not at the expense of other uses. Reference should be made to shared areas on borders with other boroughs.	Noted. The Council will work with adjoining Councils to identify any particular pieces of infrastructure/ non-residential uses that are required to serve wider than Brent population needs and will consider its provision in application sites where it can be justified.	Make reference to potential cross boundary uses in locations on the edge of Brent that serve a wider function in meeting needs also outside the borough in paragraph 6.2.38.
6.2 Housing	BH2	St George	Welcome identification of Growth Areas for new housing.	Noted.	No change
6.2 Housing	BH2	Apartments for London and Wembley Towers Limited (owners of Wembley Point and surrounding land), Stonebridge Real Estate Development Ltd (Unisys site owner)	Generally supported but additional housing should also be promoted in sustainable locations with good public transport accessibility. Proposed Modifications: Policy BH2 should identify transport hubs and areas with good PTAL as locations where the provision of additional homes will be supported. Noted in the policy justification at Paragraph 6.2.37 but is not explicitly referenced in the policy.	This is not considered necessary as Brent Local Plan does not need to repeat London Plan policies. The site allocations, town centres/ intensification corridors and areas for tall buildings as preferred locations for development are consistent with the broad principle of providing additional development in areas with good access to public transport, with the additional assessment of character taken account of.	No change
6.2 Housing	BH2	Quintain	Object to second half of Policy BH2. It should be revised. Re-providing the same amount of non-residential floorspace will significantly reduce the viability of development and therefore the number of sites that come	The policy is consistent with ensuring that mixed use places are built that not only meet housing need, but also address people's non-residential needs and place making. It will assist in meeting employment, retail and	No change

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			forward for housing. It will also impact affordable housing targets and other policy requirements within the plan. The cumulative impact on viability of this and other policies needs to be fully tested and understood by LBB. Viability evidence should be made available for review at the earliest opportunity. Please refer to Appendix 1 for proposed text changes.	social infrastructure needs. There are sufficient caveats provided in criteria a) and b) to allow for flexibility where it can be shown re-provision is not needed, or the proposed development's benefits without the replacement outweighs its potential loss.	
6.2 Housing	6.2.37	Quintain	Concern that the re-provision of non-residential floorspace could prevent sites from coming forward due to concerns over viability.	Noted. The two exceptions to policy BH2 as listed in criterion A & B will see that re-provision will not be necessary providing it can be demonstrated that it will not be viable.	No change
6.2 Housing	6.2.39	Quintain	Need to demonstrate that re-provision of non-residential floorspace will not be viable is unnecessary and restrictive. It will be very difficult to demonstrate at application stage that there is no demand for re-provision of a use/floorspace that is yet to be built.	The Council does not accept this. The approach ensures that the use of sites is considered in the round and that land values are kept realistic so that non-residential uses in particular are not automatically displaced in redevelopments where otherwise their provision would enhance the offer to the community or contribute to a sense of place.	No change
6.2 Housing	6.2.40	Quintain	The requirements to demonstrate that re-provision of non-residential uses will not be appropriate is onerous and will slow down delivery.	The Council does not accept this. The approach ensures that the use of sites is considered in the round and that land values are kept realistic so that non-	No change

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				residential uses in particular are not automatically displaced in redevelopments where otherwise their provision would enhance the offer to the community or contribute to a sense of place.	
6.2 Housing	BH3	Alison Hopkins	A focus on mostly private rented housing especially if it is student accommodation destroys community. Churn and transience levels of six months to a year reduces place belonging. Corporate landlords result in homogeneity and lowering of standards.	Noted. The policy will only be relevant to those developments which are greater than 500 homes, are therefore leaves a lot of developments to focus on properties for owner occupiers. The rising price of property is resulting greater proportions of people renting and this will continue to be the case in the short to medium term. Institutional Build to Rent properties will help increase supply of accommodation which will hopefully bring down rents as well as improving design quality. Many large scale landlords seek to retain tenants by offering longer term leases as tenant turnover increases costs/ reduces revenues. Most owner occupiers on average live in an area for 7 years. This group however now makes up a smaller proportion of occupants of all new developments (even when homes are all offered for sale) as landlords have greater purchasing power. As such 'churn' of residents, particularly in London	No change

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				where there is so much housing and employment choice is a unfortunately a constant phenomenon.	
6.2 Housing	BH3	Wendy Martin	A high percentage of rental homes weakens community and does not enhance the local area.	Noted. Generally, homeowners appear to keep higher standards of maintenance than landlords and are more likely to be active in the community. Renting now is for many the only way to meet their housing needs, rather than being a temporary measure. Many landlords offer longer leases to reduce churn/ tenant turnover as it results in lower income/ higher costs. As such it is considered that the policy approach will not cause significant harm to community cohesion compared to an alternative based primarily on build for sale.	No change
6.2 Housing	BH3	Elizabeth Lindsay	Disagree if build to rent is private rent as there are too many examples of tenants being exploited.	The Council is being supportive of institutional rent as it considers overall that these types of landlord are likely to be more professional and offer tenants better experiences of rentals. Whilst the Council has introduced licensing for many private landlords, the majority are very small operators and not professionals. As such their quality of management varies, often to the detriment of their tenants.	No change

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6.2 Housing	BH3	Renu Kaul	A higher percentage of rental homes increases population movement and less community cohesion. Wembley Central, Alperton and Sudbury have stable communities which will be undermined by this policy. The Plan should promote greater affordable home ownership which will increase community cohesion and pride in areas.	Renting now is for many the only way to meet their housing needs, rather than being a temporary measure. Many institutional landlords offer longer leases to reduce churn/ tenant turnover as it results in lower income/ higher costs. As such it is considered that the policy approach will not cause significant harm to community cohesion compared to an alternative based primarily on build for sale. Sudbury is unlikely to have sites where the policy threshold would apply.	No change
6.2 Housing	BH3	David Pearson	Home owners have an interest in an area's upkeep, landlords not necessarily so. The Council should be the primary provider of affordable homes.	Noted. Generally, homeowners appear to keep higher standards of maintenance than landlords and are more likely to be active in the community. The Council is not in a position currently to be the primary provider of new affordable homes due to limited finance and capacity. In any case registered providers for the most part provide high quality affordable homes that meet tenants' needs.	No change
6.2 Housing	BH3	Mary Duffy	Large scale build to rent creates a transient population with no long term stake who are less likely to participate in community/public life. Will minimise opposition to further development and represent a	Renting now is for many the only way to meet their housing needs, rather than being a temporary measure. Many landlords offer longer leases to reduce churn/ tenant turnover as it results in lower income/ higher costs. As	No change

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			privatisation of land and homes. Home-owners tend to create populations with the opposite characteristics.	such it is considered that the policy approach will not cause significant harm to community cohesion compared to an alternative based primarily on build for sale. It is not the intention of the policy to minimise opposition to further homes, it is about allowing private renters to better meet their needs. The land on which these policies will apply will in almost all cases be privately owned/ developed in any case. The policy approach will not change this.	
6.2 Housing	BH3	Veenay Chheda	Keep it simple, build to own or rent out with suitable controls on landlords and HMOs.	Noted. The Plan supports a wide range of delivery models as all will be required to ensure the housing target is met. Smaller scale landlords will still be able to 'buy to let' individual properties that are part of market sales. As identified, in the majority of cases these will be required to have a private landlord licence.	No change
6.2 Housing	BH3	Christine Harvey	Build to rent supported if not multiple occupation and provided at affordable rents	The majority of build to rent is for single households. Within these developments an element of affordable rented properties will be sought. As with all affordable housing policy requirements, these will be subject to viability assessment in most cases and have to weigh up the priority given	No change

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				to fewer dwellings with much more affordable rents, compared to more with rental levels that are higher. Brent's preference is for rents to be as low as possible to meet its majority priority needs.	
6.2 Housing	BH3	Mary Farrell	Short term rentals disrupt schooling and prevent development of a sense of belonging and community links	Renting now is for many the only way to meet their housing needs, rather than being a temporary measure. Many landlords offer longer leases to reduce churn/tenant turnover as it results in lower income/ higher costs. As such it is considered that the policy approach will not cause significant harm to community cohesion compared to an alternative based primarily on build for sale.	No change
6.2 Housing	BH3	St George	The draft London Plan proposes a threshold of 50 units for build to rent. The proposed threshold of 500 units is considered to restrict the opportunities for delivering this type of accommodation. Welcome fact the product may not positively add to all developments of this scale.	This misunderstands the policy. The London Plan policy would still apply and defines what can be considered as build to rent development. The Brent policy seeks to ensure positive provision of build to rent on larger sites to ensure it gets built rather than build to rent developers potentially being consistently priced out the land market and therefore unable to obtain sites for development.	No change
6.2 Housing	BH3	Nancy Platt	Build to rent will prevent properties sitting empty. Need increased vacant property tax.	It is envisaged that build to rent will ensure efficient occupation of property. Brent is not considered	No change

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				to have a significant level of 'buy to leave' properties. Long term vacant residential properties are taxed at a higher rate than occupied homes.	
6.2 Housing	BH3	L&Q	Support securing a range of housing types, including Build to Rent. Current wording appears to require Build to Rent properties to be provided within all Growth Area developments. This is too onerous. A minimum threshold should be set, as well as consideration of amount of build to rent in vicinity.	This is considered necessary to actively ensure that developments consider the provision of Build to Rent consistent with draft London Plan policy H13.	No change
6.2 Housing	BH3	Andy Brommage	Intervention Vs market needs to be balanced. Rented accommodation should not be preferred to privately owned. Sudbury Town has much rented social housing.	Noted. The policy will only be relevant to those developments which are greater than 500 homes, are therefore leaves a lot of developments to focus on properties for owner occupiers. In Sudbury it is unlikely that there will be any sites that fall within this policy requirement.	No change
6.2 Housing	BH3	Apartments for London, Wembley Towers Limited (owners of Wembley Point and surrounding land), Stonebridge Real Estate Development Ltd (Unisys site owner)	Policy is restrictive and cannot dictate a type of housing and preclude others. Whilst PRS is welcomed, a policy which demands its provision is unsuitable. Proposed Modifications: Delete policy and add one that sets out support for Build to Rent within the Borough.	This is not considered appropriate, as sites are required to ensure delivery of build to rent which is a necessity to encourage higher build out rates. The London Plan provides support for build to rent, this Brent policy provides the opportunity to provide capacity to support delivery.	No change

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6.2 Housing	BH3	Shruti Soni	Build to Rent is creating a huge transient population with less of a stake in an area, affecting Wembley's population mix. Brent should encourage more homeownership to restore the balance.	Renting now is for many the only way to meet their housing needs, rather than being a temporary measure. Many landlords offer longer leases to reduce churn/tenant turnover as it results in lower income/ higher costs. As such it is considered that the policy approach will not cause significant harm to community cohesion compared to an alternative based primarily on build for sale.	No change
6.2 Housing	BH3	Ashleigh Bell	Renters don't look after homes and don't make community neighbourhoods.	Noted. As such the emphasis for maintenance falls on landlords. It is more likely that institutional landlords owning larger blocks of development will make a considered attempt to maintain properties. Many small scale landlords are either 'absentee' or have a shorter term outlook for their property which does not encourage maintenance investment.	No change
6.2 Housing	BH3	TfL Commercial Development	Provision of Build to Rent is supported. The policy is too inflexible. It provides no support for schemes suitable for Build to Rent smaller than the 500 units specified. Conversely, there may be requirements for other forms of housing on sites of over 500 units. It is suggested that the	The policy does not set a minimum size for the amount of build to rent that should be provided, but sets a requirement for the larger developments to show that they have at least actively considered its provision. Consistent with London Plan policy, this could result in developments of 50	No change

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			word “expected” is replaced with “supported”. The wording does not reflect Paragraph 6.2.45.	dwellings or more as built to rent schemes. "Supported" has very little bite and will not ensure that the possibility of providing build to rent has rigorously been considered by the developer/ borough as part of the application process. As shown by previous policies, this results in non-mainstream housing provision/ needs being by-passed.	
6.2 Housing	BH3	Quintain	Support policy but suggest change from 'expected' to 'encouraged' or similar. Policy should be expanded to note standard Local Plan housing policies may be applied differently for Build to Rent developments. Applicants could rely on the London's Plan detailed guidance to demonstrate divergence from local policy standards. BTR would not designed to a lesser quality but to a different quality, reflective of the product and the market and help developers compete with more traditional housing developers thereby increasing housing delivery in the borough.	Encouraged is not considered to be sufficiently robust to creating a change in approach as standard developers are shown in most cases to be able to pay more for sites than build to rent. Whilst understanding the sentiment, the Council is reluctant to encourage divergence from London Plan standards for build to rent homes on a consistent basis. These homes will for many people be their long-term residences, so decreases in design standards compared to those able to purchase/ renting affordable homes is not considered appropriate. The Council is clear that it wishes to encourage private sector renting and as such will be willing to consider a differentiation in standards where it can be justified by the developer and weigh this up against other	No change

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				aspects of the quality of development/ opportunities it brings for people to meet their housing needs.	
6.2 Housing	BH3	Jeremy Biggin	You will need to remain flexible on the principle of rental or ownership. Needs more clarity on alternative provision and definition of “affordable”. Not necessarily something you can control. Lease reform is needed to ensure transiency is reduced.	Noted. It is recognised that better definition of what is an acceptable affordable mix for the fast track approach for 'build to rent' is required in Policy BH7.	Amend policy BH5 to take account of Build to Rent in the fast track approach and preferred affordable tenure type.
6.2 Housing	BH4	Greater London Authority (GLA)	The policy would frustrate the presumption in favour of small housing development within 800m of a station or a town centre boundary. Draft London Plan encourages boroughs to prepare design codes which in Brent could take account of the prevailing character and setting in those areas where it would apply. Brent should proactively follow the approach set out in Draft New London Plan Policy H2.	Noted. The Council sees London Plan Policy as a 'blunt tool' which requires refinement with respect to Brent's specific circumstances. The removal of criterion D2 from London Plan policy H2 has been implemented due to its lack of consideration toward existing infrastructure surrounding some of our stations and the limited alternative public transport modes. If implemented, this policy will likely undermine other strategic policies which are key to Brent's sustainable development, including improving air quality and the uptake of active transport modes. When the Council has the resources it will implement production of design codes/ guidance for small sites/intensification corridors to	No change.

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				assist in delivering better quality development.	
6.2 Housing	BH4	Steve Hilditch	The Council should seek affordable housing contributions from smaller sites (less than 10 dwellings). Whilst on-site provision is not allowed through national policy, it is ambiguous on financial contributions. As small sites are important in achieving housing targets, the council must push as far as it can.	The NPPF sets out that contributions to affordable housing should not be sought from minor developments (contributions means dwellings or a financial alternative). Should is defined as "indicating obligation, duty or correctness." It is however not as strong as "must" which the NPPF also uses. Given the need for affordable housing in the borough and the viability assessment's indication that in many minor residential developments would still be viable if making a financial contribution it is considered that it is appropriate to at least try to take forward such a policy. Nevertheless, given that the NPPG outlines cases in which exceptions are possible (which only relates to rural areas), it is possible that the Examination inspector may deem such a policy inconsistent with national policy/ guidance.	Amend BH5 to Include a requirement for minor residential development of between 5-9 dwellings to provide a commuted sum as an affordable housing contribution.
6.2 Housing	BH4	Historic England	Objected to draft London Plan Policy H2 criterion E (which refers to 'unacceptable harm to heritage assets') does not comply	Noted. This is for the London Plan examination to address. Brent's policy on Heritage Assets which is consistent with the NPPF and has Historic England support would in	No change

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			with the NPPF and recommend this text is revisited.	any case need to be considered too when determining planning applications.	
6.2 Housing	BH5	St George	Development viability is complex, and changing, and is impacted by many variables which can change in a short time. The policy should allow sufficient flexibility allowing proposals “broadly consistent” with the tenure splits, and not required to adhere to them.	It is considered that sufficient flexibility exists within the Brent rented element to allow for changes in emphasis to reflect viability. To provide greater flexibility would otherwise probably lead to increased assumptions on land values which would undermine delivery of the affordable housing amount and tenure types.	No change
6.2 Housing	BH5	Elizabeth Lindsay	Affordable housing should be linked to local incomes not market prices and ideally, 100% of new homes should be affordable based on local incomes and/ or need. Empty houses need to be occupied and also greater use of existing housing stock.	Government made the break between incomes and affordability some time ago in national policy. As such nearly all intermediate affordable housing is based on prices. The Mayor has sought to introduce an element related to income through London Living Rent which is based on a point on the median income levels of local wards. Social rent properties have very low rents based on the historic Council rents charged. Given current funding constraints there is no prospect of 100% of new homes being affordable. Empty homes are a low percentage in Brent and the Council encourages their occupation. Brent's housing stock	No change

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				is being used very efficiently. The population has grown by nearly 30% in 20 years, whilst the number of additional homes provided has not been near this. Average household size is one of the highest in the UK, which if anything indicates overcrowding of properties.	
6.2 Housing	BH5	Mary Duffy	Support. Many developments around Kilburn South and Harlesden are not affordable to most working people. Residents at Kilburn South have been displaced to accommodate new build. Brent does the bidding of developers and not residents.	Affordable tenant residents of South Kilburn have not been displaced from the area if they indicated that they want to remain in the estate. Leaseholders who live in the homes they have purchased will also be offered the ability to remain on favourable terms. The Council seeks to achieve the best development that it can that meets identified needs and does not unacceptably impact on existing residents' lives.	No change
6.2 Housing	BH5	Martin Francis	Concerned policy abandons the 50% affordable target and allows for less than 35% in particular circumstances as a result of viability assessments, particularly given long waiting lists and low incomes of families. Within that 35%-50% affordable the tenure split makes sense. Support 6.2.61 strategy as long as it is transparent. Council should organise a conference/forum on	Brent as is the case with the Mayor will not seek to abandon its long term target of achieving 50% affordable homes. It recognises that currently that this is unattainable on most sites due to viability considerations and as with the Mayor for the meantime operate the 35% fast track approach, subject to the London Plan reconsidering this issue in	Clarify within policy and paragraph 6.2.58 that a strategic target of 50% affordable across the borough is sought, but for planning purposes in the short term the fast track thresholds apply.

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			community land trusts to educate the public about them and consider their role in the borough.	2021 where the target could be amended.	
6.2 Housing	BH5	Neil Zussman	Percentages should be higher (hence why I don't agree) but acknowledge this is a good start (hence why I don't disagree either).	Noted.	No change
6.2 Housing	BH5	Renu Kaul	Do not believe this is possible nor enforceable. Developers will always seek to maximise their profit margins and use viability assessments to do this. How can the 35% affordable housing be made to stick and what penalties apply if not delivered? Will/ can the Council enforce the obligations?	The Mayor believes that his policy will encourage developers to take the fast track approach rather than pursue viability assessments. The 35% will be sought in S106 planning obligations. The Council can and will enforce these. Developers no longer have an automatic right to challenge formerly agreed S106 obligations on the basis that the obligation now makes the scheme unviable. This temporary mechanism related to the financial crisis was repealed in April 2016.	No change
6.2 Housing	BH5	Alison Hopkins	Target nowhere near enough. Classification of affordability at 80 percent of market rent is nonsense, especially as the rented property focus will drive up rents.	The target reflects viability and national policy constraints. There simply is not sufficient public funds to support the number of truly affordable homes required at the very low cost rental (social) rent levels required. As such there has to be a balance between ensuring continued housing delivery and providing as best for affordable needs as possible. The 80% of	No change

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				market rent is defined in National Planning Policy as Affordable Rent and as such is something that the Council has to consider, although it is not a priority. This provides enough of a discount for those whom cannot afford market rates whilst also being viable for subsidy by other, market tenures, and ensures delivery of a sufficient number of units. If the rate was to be reduced further, more subsidy would be required, which would result in a lower level of delivery. The Council sees the delivery of greater levels of build to rent units as an opportunity to increase market competition, potentially resulting in lower rents and better standards.	
6.2 Housing	BH5	Quintain	Policy is only for Non-Build to Rent developments. Policy needs to set out fast track route for Build to Rent to encourage delivery. This either needs to be included in Policy BH5, added to Policy BH3 or alternatively a bespoke BTR policy included in the plan.	Noted. It is accepted that there also needs to be clarity on the affordable housing mix for the fast track approach for Build to Rent, consistent with draft London Plan policy H13.	Amend Policy H4 to include the affordable split required to allow the fast track approach to build for rent to be undertaken.
6.2 Housing	BH5	Shruti Soni	Developers always get around requirements by showing it to be economically unviable. It should be non-negotiable.	National policy does not allow for non-negotiation, but is indicating that developers should not seek to rely on viability considerations as part of the application process	No change

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				where local plans have had an assessment of viability undertaken.	
6.2 Housing	BH5	Apartments for London, Wembley Towers Limited (owners of Wembley Point and surrounding land), Stonebridge Real Estate Development Ltd (Unisys site owner)	<p>Following changes to this policy are sought:</p> <ul style="list-style-type: none"> - Clarification of the Council's affordable housing target at 35% and confirmation that this is what is required to comply with the fast track approach (subject to meeting tenure objectives); - Clarification of the Council's BtR affordable component and the relevant rental levels to take account of the fast track route (considering the relationship between the level of discount required and the viability of achieving the relevant threshold level). - An acceptance that certain site circumstances and wider partnership / framework agreements means that there is a requirement for a maximisation of affordable housing (occasionally at 100% as per the AfL agreement with TfL). As such flexibility on the tenure due to locational factors and viability will be key considerations, as will the overall 	<p>This is unnecessary as the London Plan sets that fast track targets for individual sites according to their characteristics/ status of the developer.</p> <p>It is accepted that the Council could provide greater clarity on the tenure/ rental values sought within the build to rent sector particularly as registered social landlord involvement in delivery may well be less likely as funding institutions will seek to retain single ownership/ control of the private rental scheme.</p> <p>This is accepted up to a point. Brent considers that it is likely the Mayor's policies as currently applied will lead to an over-provision of intermediate products compared to needs as the affordable housing targets have been set so high. On this basis unless London Plan planning policy provides an exception, the Council reserves the right to challenge the developer to try to provide the tenure split that is consistent with its Local Plan</p>	No change

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			tenure mix for public sector landowners who have agreements with the Mayor for delivering AH across their portfolio.	policy unless the developer can justify why there is a need for exception to policy.	
6.2 Housing	BH5	OPDC	Justification text should note that Build to rent developments can also provide London Living Rent as affordable housing.	The Council accepts that it needs to provide a policy that identifies the type of discount market rent that should be provided in Build to Rent schemes to allow the fast track approach to be taken. London Living Rent rates are identified as a requirement of 30% of the affordable by the London Plan.	Include within policy H4 the preferred rent equivalent splits for affordable housing provision within Build to Rent schemes to enable the fast track approach to be taken forward.
6.2 Housing	BH5	Steve Hilditch	Brent's target tenure split (Policy BH5) amongst the affordable homes within the fast track allows for a very large share to be at unnecessarily high rents. In practice the majority of developers will seek to provide properties with higher rents. This would defeat the overall purpose of the policy and contradict both the policy objective and the needs assessment. Development proposals involving rents above SR/LAR should either be included in the 'intermediate products' category or, if they are included within the 70% SR/LAR category, they should be identified as an	Taking account of the Local Plan viability work the 70% split will now focus on the social rent/ London affordable rent, with other rental products identified within the 30% intermediate.	Amend policy BH5 to reflect viability study and 70% social rent/London Affordable Rent requirement and the other rental products as intermediate rents.

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			<p>'exceptional circumstances' exemption requiring substantial justification.</p> <p>The examples quoted are not entirely convincing. Land that requires investment in infrastructure to open the site up or requires decontamination should have a lower value not a higher end rent. The policy allows an escape route for developers who have paid over the odds for land.</p>		
6.2 Housing	BH5	Andy Brommage	<p>Target is arbitrary, more thought needs to be given on the balance of developer Vs government funding. No problem with an overall borough wide policy but it must be flexible for each development site & responsive to the existing stock.</p>	<p>The target takes account of viability assessment work at the London and Brent level. It reflects the tenures that can be reasonably sought to meet needs, balancing up priority tenures with the need for balanced and mixed communities. Given the need for affordable homes, together with the impacts of policies such as right to buy, it is not considered that there are likely to be many cases where the existing mix of a community is such that no additional provision of affordable homes is warranted in order to ensure a balanced and mixed community.</p>	No change
6.2 Housing	BH5	Wendy Martin	<p>Policy cannot be guaranteed. Could result in housing no one wants to live in with local</p>	<p>The policy helps strengthen the Council's position when it comes to requesting affordable housing</p>	No change

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			residents enduring long term building works and disruption.	from development proposals. The need for affordable homes is so great across all tenures that it is not considered likely that it will result in homes no one wants to live in. Residents' amenity will be protected through appropriate use of policy and conditions on applications related to their implementation.	
6.2 Housing	BH5	TfL Commercial Development	Policy should include the overall position on the percentage of affordable housing sought for clarity. Also needs to address Build to Rent schemes and proportion of discount market rents at differential levels sought.	Noted. The strategic target can be included within the policy as the GLA is proposing to review the strategic fast track target by 2021 and potentially make amendment through SPG. Additions to the policy can show the build to rent schemes tenure split.	Amend policy to make reference to Brent's strategic target of 50% affordable. Add the tenure split for build to rent.
6.2 Housing	BH5	Quintain	Policy wording should be amended for the 35% to be by habitable room (not units) in accordance with the London Plan. The policy should also include affordable housing size mix due to its impact on viability.	The Brent Local Plan does not need to repeat the London Plan which clearly states the percentage is determined by habitable rooms. It is accepted that some clarity will be provided by identifying the affordable housing needs split by size of dwelling. To provide sufficient flexibility for both the Council and applicant, it is proposed that this will be in the supporting text rather than as a specific policy requirement. This will allow changes in site circumstances to be more readily	Include affordable housing size mix within the supporting text.

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				factored into the appropriate sizes agreed.	
6.2 Housing	BH5	Metropolitan Police Service	Support threshold approach but request reference to the Mayor's portfolio approach where a public landowner has committed to delivering 50% cent across a portfolio of sites, then individual sites providing 35% or more affordable housing can still be considered under the Fast Track Route.	The Council does not need to repeat London Plan policy. The Council is clear it will follow the threshold approach which sets out minimum requirements where a portfolio approach has been undertaken with a public land holder. This still seeks as a minimum the 35% on site consistent with the borough's tenure split.	No change
6.2 Housing	BH5	Pocket Living	Delivery of this target will continue to be a challenge for new development and sufficient flexibility should be provided in line with the London Plan to not unduly prevent development. London Plan Affordable Housing SPG (paragraph 2.42) seeks to incentivise largely or entirely affordable schemes through allowing 75% affordable housing schemes to pursue the Fast Track Route (whatever their tenure mix). Draft London Plan Policy H6 reflects this approach where the tenure mix is acceptable to the borough (or where relevant the Mayor). Policy BH5 of the draft Plan sets out the affordable housing tenure split sought in Brent and advises that	The London Plan requires the borough's tenure split to be achieved for the first 35% on any public land scheme that delivers the minimum 50% required for the fast track approach. On schemes with 75% it may allow for a flexible approach to tenure where the borough agrees with the proposed tenure mix. Given the need for social rent within the borough, the Council is likely to pursue its preferred tenure split for the first 35% of any affordable housing proposed whatever fast track approach related to public land is sought by the developer.	Identify within BH5 policy justification the fact that whatever fast track approach is proposed that the Council will require at least 35% of all the habitable rooms provided to be consistent with its preferred tenure mix.

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			this is the split required to comply with the Fast Track approach for viability. However, paragraph 6.2.56 of the draft Plan acknowledges that the need for affordable housing outweighs the number of homes that can be delivered over the lifetime of the Plan.		
6.2 Housing	6.2.54	Greater London Authority (GLA)	Amendments are required to paragraph 6.2.54 to clarify that the threshold for fast track is 35% or 50% affordable housing, and it is not the London Plan target.	This is a fair point but in any case this part of the document will be removed for the publication stage as it was only relevant to the preferred options stage.	No change
6.2 Housing	6.2.57	OPDC	Agree that delivery of social and affordable rent is difficult and particularly difficult in areas which require significant infrastructure requirements.	Noted.	No change
6.2 Housing	6.2.58	Greater London Authority (GLA)	Brent should recognise new amendments in the Draft London Plan which state that the 50% affordable housing threshold for public sector land applies where there is no portfolio agreement. Where there is an agreement to delivery at least 50%, then the 35% threshold will apply.	Appropriate amendments will be made to this chapter to reflect amendments made to the draft London Plan as it proceeds through the adoption process.	Amend the Plan to take account of changes in content of the draft London Plan.
6.2 Housing	6.2.60	St George	It should be noted within policy BH5 that if the fast track provision of 35% affordable housing is not met, then a financial viability assessment will	Taking account of the emerging London Plan policy minor amendments to this policy will occur to provide greater clarity in what will be sought in Brent.	Amend policy BH5 and supporting text to take account of changes to draft London Plan contents and ensure

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			be required. This will help provide clarity.		Brent's policy is clear and complementary.
6.2 Housing	6.2.61	Steve Hilditch	The Council wishes to achieve preferred tenure mixes as opposed to maximising affordable housing figures. This approach is not seen to be consistent throughout the plan, with the greater goal seeming to be maximising delivery. The aim should rather be to maximise the delivery of housing that will meet Brent's need for genuinely affordable homes.	The aim of the Plan is to maximise the delivery of homes that will meet Brent's needs. Planning policy can only go so far in achieving this, other mechanisms such as public sector intervention are another important part and their impact is yet unknown due to uncertainties around delivery. As such the policies seek to extract the maximum that can realistically be achieved taking account of higher tier planning policies and development viability.	No change
6.2 Housing	6.2.61	Pocket Living	The Council wishes to achieve preferred tenure mixes as opposed to maximising affordable housing figures. Policy BH5 should recognise that the specific circumstances of individual sites may provide justification for an alternative tenure mix which would better meet needs, and therefore flexibility in this policy is sought.	Noted. The identified need within Brent is for the most affordable tenures of Socially Rented and London Affordable Rent. It is therefore the Council's position that these should be maximised at the expense of greater affordable tenure percentages. The Council does not see a case for the provision of more intermediate affordable products as in any case its preferred tenure mix more than compensates for the identified need for intermediate tenures related to Brent's own needs.	No change
6.2 Housing	6.2.61	St George	The Council wishes to achieve preferred tenure mixes as opposed to maximising	This is not considered to be the case as the affordable housing provided will be that which best	No change

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			affordable housing figures. This will reduce the Council's ability to meet its housing targets and a more flexible approach should therefore be taken.	meets priority needs. Reductions in affordable housing numbers will be replaced by market housing consistent with the capacity available on the site. It is likely that the need for intermediate tenures will be in any case be more than satisfactorily addressed due the London Plan's policies which seek a very high percentage target. This essentially encourages provision of significant intermediate housing numbers, plus Registered Providers own programmes and their desire to promote mixed tenure developments will also ensure provision of intermediate homes.	
6.2 Housing	6.2.62	Greater London Authority (GLA)	Paragraph 6.2.62 should be amended to reflect the approach set out in Draft New London Plan Policy H7, making it clear that proposals for schemes which meet the threshold requirement but at a tenure split different from the one in the Local Plan must follow the Viability Tested Route.	Noted. The Plan shall be amended to be consistent with the content of the London Plan on this matter.	Amend the affordable housing policy so that it is consistent and complementary to the fast track approach as set out in the London Plan.
6.2 Housing	6.2.64	St George	It is considered premature to require a planning application to identify a registered provider who will own or manage the affordable housing. This should be done after permission has been granted.	The earlier a Registered Provider is included in the process, the more likely that the scheme will positively address the need for affordable housing and give providers products that can best meet the long term needs in terms	No change

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				of management and accommodation requirements.	
6.2 Housing	6.2.65	St George	Paragraph 6.2.65 states that a Financial Viability Assessment must be submitted if the fast track approach is not met. It would be useful for readers if implementation of the fast track approach could be explicitly stated.	The policy is clear that the tenure split applies to the London Plan policy H6 fast track approach. The Council does not need to repeat the wording of the London Plan.	No change
6.2 Housing	BH6	Elizabeth Lindsay	All families have a right to have appropriate accommodation. 25% far too low	Noted, however the Council considers that it has pursued the right balance with the policy mix proposed when taking account of national and London Plan policy which limit intervention on size of private sector dwellings.	No change
6.2 Housing	BH6	Andy Brommage	Dwelling unit size mix limitations should not be set in advance. Each development needs to be looked at individually, taking a borough wide mix with flexibility to take into account what is already in the surrounding area.	Agreed up to a point, but the Council is concerned that no guidance means an automatic assumption from the developer that they can plan to not address wider needs which will further reduce the availability of new family sized accommodation. The current policy allows sufficient flexibility to take into account circumstances.	No change
6.2 Housing	BH6	Neil Zussman	No problem if they're available to be rented by groups of friends as well as several colleagues are struggling to find affordable rented places	Noted. Ideally they will be occupied by families in need, but it is also possible that they will be occupied by sharers.	No change

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6.2 Housing	BH6	Apartments for London and Wembley Towers Limited (owners of Wembley Point and surrounding land), Stonebridge Real Estate Development Ltd (Unisys site owner)	Proposed Modifications: No prescription of a target for the number of rooms in a dwelling. If applied, it should only apply to affordable rented homes.	The Council considers that it has the balance about right. It is not prescriptive on the majority of dwellings and in any case much of the 25% 3 bed ends up being provided through the affordable housing element. The SHMA indicates a much greater need for 3 bed homes than is being sought and it is considered appropriate for the Council to identify the need for some of the housing provided to at least meet local needs.	No change
6.2 Housing	BH6	Jeremy Biggin	Clearer to push for London design standards and proportion of family homes within this.	The Plan does not need to repeat London Plan policies and is clear on what proportion of larger family homes will be required.	No change
6.2 Housing	BH6	Greater London Authority (GLA)	Dwelling size mix requirements for low cost rent housing should be based on evidence from Brent's Strategic Housing Market Assessment suggests 19% should be +3 bed units.	Noted. Further detail will be set out in the policy justification.	Amend policy justification to make reference to the different housing sizes by tenure identified in the Brent SHMA.
6.2 Housing	BH6	Wendy Martin	Families deserve a spacious home, preferably houses with gardens not high rise flats.	The housing size standards will lead to generous sized homes compared to normal market solutions in most cases. The Council seeks provision of suitable amenity space and in the case of larger family homes seeks direct to a relatively generous space compared to London Plan standards. The housing numbers needed mean that for most sites	No change

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				there is no other option than building flats.	
6.2 Housing	BH6	David Pearson	Families need adequate space and those providing homes need to recognise this.	Agreed. London Plan deals with minimum sizes of properties, overall and related to room sizes. The Brent Local Plan provides minimum sizes for amenity space for those dwellings.	No change
6.2 Housing	BH6	Renu Kaul	Families need homes fit for purpose, not in towers and apartment blocks. This should not integrally change an area's character and height.	The homes will be fit for purpose. The provision in the form of flats is as a result of the significant numbers of homes required, aligned with the limited availability of suitable land on which to provide them, thus requiring increased densities. For some parts of Brent it is inevitable that to accommodate the dwellings needed that character will change.	No change
6.2 Housing	BH6	Mary Duffy	Many people cannot afford to have more than two children. Many 'large families' are in Neasden unrelated individuals living in cramped conditions pushed by landlords to identify themselves as families to circumvent HMO restrictions.	This area is covered by private sector landlord licensing and as part of this process the Council will be able to better monitor quality of accommodation than has been the case in the past.	No change

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6.2 Housing	BH6	Vikram Soni	3 bed+ family housing is the predominant requirement and policy should only support developments providing it. Developers appear to be doing the opposite in Wembley. Most of these dwellings either serve transient residents or indeed contribute to overcrowding.	National policy does not allow for the Council to be very specific about what private housing developers should provide and the emerging London Plan policy taking account of London as a whole prioritises 1 and 2 bed properties. The Council has to balance up a number of competing priorities and taking account of these considers that a 25% 3 bed requirement is fair, helping to meet local priority needs but balancing this up against development viability/ delivery.	No change
6.2 Housing	BH6	St George	Need to provide a mix of housing sizes is recognised. The proposed requirement is onerous. The draft policy offers some flexibility, but more should be given to allow proposals to demonstrate that this is amount of family homes is unviable. The draft London Plan Policy H12(c) is welcomed and should similarly be adopted by the Brent Local Plan.	The Council does not consider the policy onerous. It is applied in a sensible manner, taking account of national policy requirements around viability and other factors such as the location which might influence its suitability. The Council does not consider that the draft London Plan policy adequately recognises and addresses London's housing needs by over emphasising a priority for smaller properties which due to benefits restrictions are actually unlikely to be occupied by those people the plan assumes.	No change

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6.2 Housing	BH6	TfL Commercial Development	Consistent with Draft London Plan Policy H12, Policy BH6 should specify that the 25% target relates to low cost rent homes only.	Noted. This is not the case; it will apply to the whole development. The London Plan SHMA over-estimates 1 and 2 bed property needs. Discounting size needs related to family accommodation will result in increased over-crowding within the market sector.	No change
6.2 Housing	BH6	Shruti Soni	Absolute must to encourage residents to put down roots in the area and remain long term. Should further consider being more specific on 4 and 5 bed properties.	The desire to promote larger properties is understood. The Council however considers that the approach it has taken in terms of identifying 3 bed+ properties allows sufficient flexibility to allow for the provision of 4 and 5 bed properties where these are viable.	No change
6.2 Housing	BH6	Quintain	Object to policy which is inconsistent with draft London Plan Policy H12 and should be deleted, with the 25% target set out within the explanatory text of the Local Plan to explain how the Council would encourage schemes to better meet their housing needs. It needs better clarity on whether it applies to all including affordable. The percentage would undermine the viability of development and ability to meet wider housing targets. The policy does not take account of Paragraph 122 of the NPPF with regards to the efficient use of land.	The Council has objected to the London Plan H12 policy and disputes the housing mix identified in the London SHMA which over-estimates the need for 1 and 2 bed properties. It considers the inclusion of the 25% within policy as appropriate. The target will apply to all on site including affordable. The viability argument is understood and taken into consideration when the Council balances up the extent to which this policy should prevail for example compared to affordable housing numbers. Notwithstanding Paragraph 122 housing should go some way to	No change

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				meet the needs of the population within the areas which it will be built, otherwise it leads to a further alienation of the population in relation to development proposals.	
6.2 Housing	BH6	Alison Hopkins	What does “big families” mean? Three bedrooms is legally overcrowded for many.	Depending on the sex/ age/ relationship mix of occupants a 3 bed may not be overcrowded if a minimum of 6 people live in it. For some families this will not be large enough and the Brent SHMA identifies larger properties required, although the proportions are relatively small compared to 3 bed and under. The SHMA takes into account overcrowding standards when determining the type of dwelling sizes required.	No change
6.2 Housing	BH6	Pocket Living	The policy is contrary to paragraph 4.12.2 of the draft new London Plan (Minor Suggested Changes, August 2018). Smaller homes play an important role in meeting London’s housing need. They can help to provide a greater balance of accommodation, reducing pressure to convert and subdivide larger homes, and the occupation of larger homes by sharers. The target restricts the ability of individual developments from responding most appropriately to	Noted, but the London Plan SHMA over-estimates the need for 1 and 2 bed properties and also the vast majority of homes currently built in Brent (75%) are one and two bedroom properties. The Brent SHMA takes account of local needs which will still form the majority requirement for the homes delivered in Brent. As it is the 25% sought is way off identified needs. Pocket homes will have a very small impact on freeing up family homes from HMO use. The Council operates the policy in	No change

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			their context to meet housing needs. It should be revised to refer to provision of a mix of homes across the borough to provide balanced communities, while ensuring sufficient flexibility to respond to specific needs and individual site circumstances for development proposals.	a sufficiently flexible way taking account of the developments location, market, etc.	
6.2 Housing	BH6	Ashleigh Bell	Why only 25 % though?	The 25% reflects the need for flexibility and national planning policy that limits the extent to which local planning authorities can 'prescribe' needs to be met from market housing developments in terms of dwelling sizes. The 25% has worked well in creating more mixed developments and for the most part is achieved on sites.	No change
6.2 Housing	6.2.69	Steve Hilditch	This policy should constitute part of a comprehensive strategy to tackle both under occupation and over-crowding. This will include the delivery of smaller socially rented homes which are targeted to meet the needs of existing social tenants who need to downsize due to bedroom tax. The 25% figure is not explained or sufficiently justified.	The SHMA assumes some level of reallocation of affordable dwellings related to under-occupation taking account of Council initiatives. The Council encourages and supports tenants who are under-occupying moving to smaller dwellings. This is from a number of mechanisms such as providing purpose built accommodation or using financial incentives. It does not however force them to do so if they do not want to.	No change

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6.2 Housing	BH7	Unite Students	<p>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. The amended policy could prohibit PBSA developments and does not follow the Draft London Plan's policy thrust. A specified provider connection at this stage is extremely restrictive. It does sit well with Unite's approach which is to let to students directly. Universities are often reluctant to engage in such agreements where liable to pay void room payments or take be committed to a scheme that through delays does not deliver when assumed. Removing this restriction affords applicants a greater degree of flexibility, enabling rather than hindering delivery essential to addressing the student accommodation shortfall.</p>	<p>In relation to criterion d) it is now considered appropriate to rely on the contents of H17 of the draft London Plan as this is a comprehensive policy that addresses the majority of issues associated with student accommodation and as such the policy will be amended.</p>	<p>Amend criterion d) to: "demonstrates that there is a specific Brent need, or in the case of education a London need; and"</p>
6.2 Housing	BH7	Unite Students	<p>Criterion E) is not supported. Acknowledge concerns over the concentration of student accommodation. The policy is onerous and there is no evidence or justification provided that the concentration of PBSA creates harm to residential communities or to support the presumption</p>	<p>Taking account of draft London Plan policy H17 which allows for consideration of whether student accommodation would contribute to a mixed and inclusive neighbourhoods and knowledge of the types of accommodation that is likely to come forward in Wembley Park through on-going work with</p>	<p>Amend policy H7 to remove the 20% threshold for students.</p>

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			against PBSA in growth areas as included within the policy text. No evidence has been put forward that student accommodation will have an adverse impact. Appeal evidence from elsewhere indicates that higher levels of concentration have been accepted elsewhere (up to 62%) and a 30% minimum target can be appropriate.	Quintain and the fact that student accommodation contributes towards meeting housing targets the Council will now remove the 20% threshold from the policy.	
6.2 Housing	BH7	Greater London Authority (GLA)	The specific needs of supported and specialised accommodation and students and those in HMO's differ and should be reflected within Brent's policy. The policy should be more flexible and proactive in recognising their important role in meeting London's housing target. The local need should be evidence based and included within site allocations. This should apply to policy BH7 and to paragraphs 6.2.81, 6.2.82, 6.2.84, 6.2.86, 6.2.88.	Taking account of the emerging London Plan policy H17, this policy will be amended to reduce the criteria related to students to reduce duplication/ potential for confusion with high level policy. The need for all forms of housing is so great that many sites potentially could be used for a variety of accommodation types. In relation to supported housing, or specialist housing, evidence has identified needs. The main issue is cost and public funding, which is highly dependent on their being sufficient resources and its timing of delivery. This lack of certainty limits the potential for specific allocations as certainty on delivery is not available.	Amend Policy BH7 to reduce duplication of matters covered by draft London Plan policy H17.
6.2 Housing	BH7	Pocket Living	The flexibility that applies in Paragraph 6.2.79 in relation to	Policy BH7 does not apply to mainstream housing types. The	No change

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			10% wheelchair accessible/easily adaptable dwellings should apply to all new development (not just accommodation with shared facilities or additional support) where compelling evidence on the basis of specific details or context that this would not be appropriate exists. This would accord with 3.5.6 of the draft London Plan.	London Plan allows flexibility for a wider range of accommodation including mainstream housing types in limited circumstances, which the borough can consider if Pocket are promoting a scheme that seeks to provide a lower standard where justified.	
6.2 Housing	6.2.79	Greater London Authority (GLA)	Paragraph 6.2.79 must be amended to align with London Plan Policy D5, stating that development must ensure that a minimum of 10% of new dwellings are compliant with part M4(3) of the building regulations.	Flexibility is offered due to the specific characteristics of occupants that might not be typical of the general population. For example students who are invariably going to be on average younger than the general population are unlikely to have as high incidences of requirements for wheelchair access.	No change
6.2 Housing	6.2.80	Quintain	We are unclear at the wording of paragraph 6.2.80 which would suggest that affordable housing requirements are not applicable to student accommodation proposals.	This is a fair point in relation to para 6.2.80 and taking account of the contents of the draft London Plan which sets out when affordable provision will be sought, the Council will amend this paragraph.	Amend paragraph 6.2.80 to refer to student affordable housing requirements as set out in the London Plan.
6.2 Housing	6.2.91-95	Greater London Authority (GLA)	Paragraphs deal with differing accommodation types in one go without individual specification. The Council should work with service providers to identify the most appropriate sites to meet	Noted. It is not considered necessary to differentiate between all the potential forms of accommodation with shared facilities, this level of detail is not required as models and needs can	No change

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			specialist accommodation need without impinging on local infrastructure function.	change quite quickly and the policy will not be able to take account of this. Meeting such needs is likely to be better addressed by the Council as housing authority working with registered providers, as a housing developer in its own right, or with other organisations as part of its Housing Strategy, or when considering affordable housing requirements on very large developments. The NPPF presumption in favour of development essentially indicates that development proposals will be given permission unless they fall foul of the policy criteria. Lack of certainty on funding limits the extent to which allocations can be made as they will not be able to be shown to be deliverable if challenged.	
6.2 Housing	BH8	St George	The economics of specialist housing is different to that of market housing. Specialist homes are larger, tailored to older people's needs, and include substantial communal spaces. If affordable housing is required, then the threshold approach should be at no higher than 20% to ensure viable provision of specialist housing.	This is noted and can be addressed as part of the affordable housing viability discussions if the threshold target is not being achieved.	No change

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6.2 Housing	BH8	Greater London Authority (GLA)	Policy should be amended to identify specific sites for delivery of older peoples housing through an evidence based approach rather than delivery being triggered by certain thresholds. This should take account of rising levels of over 60's within Brent's population.	This area of housing is in development and as such is a very fluid market, with operators having different approaches to care and support, this is true of both the private sector and registered providers. At this stage in order to maintain flexibility it is considered that a general approach to larger sites is more appropriate which will allow a number of factors to be balanced up in ascertaining whether it is possible to incorporate these uses in developments that come forward.	No change
6.2 Housing	BH8	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. As Brent is challenging the London Plan/ OAN figures, the Older Person housing target should also be reduced pro-rata. No justification has been given why South Kilburn growth area has been excluded.	In taking forward Growth Areas whilst there is a role for the Council to act as mediator, for the area to be successful the main developers should really be working together so that there is clarity on ambition/ what type of place is being created and who will deliver it, so that the area is delivered as a package, rather than random developments occurring within an area. The specialist needs are part of the overall housing need and as such do not generate additional total housing requirements. The Growth Areas are not considered to be those that would fail policy BH7 and the overall older person housing target in the Brent SHMA	No change

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				is relatively consistent with the London Plan SHMA target that relates to a larger housing target. South Kilburn is excluded as that area has to re-provide social housing which is very expensive to do and is a significant challenge within the known capacity available on identified sites.	
6.2 Housing	BH9	Greater London Authority (GLA)	Welcomes use of the Draft New London Plan's definition of Gypsies and Travellers. Applying the criteria-based Policy BH9, is unlikely to result in adequate provision and Brent capacity should be identified through site allocations. Brent should make use of available funding and consider co-operating with neighbouring boroughs to identify capacity.	Brent is aware that ideally sites should be identified. Unfortunately the London Plan places so many requirements on the borough to accommodate intense use of a variety of higher value land uses that finding such sites that do not conflict with other policies will be very difficult.	No change
6.2 Housing	6.2.104	Quintain	Pitches for gypsy's and travellers should be provided at higher densities, particularly if delivered in growth areas where delivery of new homes is a priority.	Agreed, the relative scarcity of land to accommodate all Brent's development requirements requires the most efficient use of the land that is available.	No change
6.2 Housing	6.2.104	Quintain	Pitches for gypsy's and travellers should be provided at higher densities, particularly if delivered in growth areas where delivery of new homes is a priority.	Agreed, the relative scarcity of land to accommodate all Brent's development requirements requires the most efficient use of the land that is available.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.2 Housing	BH9 (para 3)		Brent should facilitate the delivery of pitches for gypsy's and travellers and collaborate with landowners and developers to identify suitable sites. It is recognised that Brent is seeking clarity on the definition of a Gypsy or Traveller as part of their representations.	Noted. As outlined in policy BH9, the Council will work in line with London Plan policy to identify and deliver the necessary pitches required for Gypsy's and Travellers once the definition is clear as the needs identified are very different.	Seek to clarify appropriate sites when the numbers of pitches required is known.
6.2 Housing	BH10	Greater London Authority (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.	Circumstances where development has been consistent with this policy are rare and essentially related to very high value areas where larger homes have formerly been sub-divided. Such activity can assist widening the demographic profile of Brent so that it also provides homes for the wealthy and also leads to the improvement of the appearance of the borough as these types of buildings often have a long history of neglect in conservation areas.	No change
6.2 Housing	6.2.121	Greater London Authority (GLA)	Paragraph should be amended to remove reference to the conversion of dwellings into smaller units being permitted where amenity standards are far below adequate levels.	This misses the point of the paragraph's contents which are not to allow sub-standard accommodation, but deal with circumstances where there is already substandard accommodation. Its replacement with residential accommodation that meets standards might for instance lead to Council support for the loss of a family dwelling	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				where current accommodation size is inadequate, has limited or no amenity space, suffers noise disturbance, etc.	
6.2 Housing	BH13	L&Q	Support policy BH13 but requires further flexibility. Policy will not be suitable for urban areas which need to achieve high densities.	Noted. It is considered that the Council does apply this policy in a proportionate way. Where full provision cannot be achieved, it might well accept a lower level of provision where the quality of the space is very high. Nevertheless, it does not seek to encourage this scenario to occur, seeking the standard to be achieved more as the norm than the exception.	No change
6.2 Housing	BH13	Pocket Living	Given the potential for ambiguity over which level applies to ground floor flats, the policy should refer to 'family housing (including ground floor flats of 3 bedrooms or more)'. Amenity provision is excessive and overly optimistic and should be reduced in line with London Plan policy. The policy should be flexible to allow lower provision of amenity space given its design and suitability.	As the policy justification seeks level access to open space, it is assumed that the 50 sq.m. for ground floor flats is because those dwellings will be used as family housing. The Council has had experience of the Brent standard for some time and considers it appropriate. Flexibility will be provided where it can be shown best endeavours have been made in seeking to achieve the target however this should be the exception rather than the rule.	Add to the policy justification clarity on the 50 sq.m being related to the standard sought for family homes of 3 bedrooms or more.
6.2 Housing	BH13	St George	Support the policy, however, flexibility should be provided so that in the occasion that sufficient amenity space can be provided which does not meet the specific	Noted. It is considered that the Council does apply this policy in a proportionate way. Where full provision cannot be achieved, it might well accept a lower level of	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			criteria. Paragraph 6.2.134 is too prescriptive and does not allow for flexibility in the light of innovative design.	provision where the quality of the space is very high. Nevertheless, it does not seek to encourage this scenario to occur, seeking the standard to be achieved more as the norm than the exception.	
6.2 Housing	BH13	Greater London Authority (GLA)	amenity requirements should be amended to include more flexibility to allow optimisation of housing delivery. Ability to deliver will differ between schemes depending on site layout.	Noted. The standard has applied to Brent over the last decade and for the most part has been shown to be able to be delivered in high density developments. Other aspects such as the Urban Greening Factor indicate the need to provide open space/ planted areas which can help meet these standards. The Council considers its approach sufficiently flexible to take account of site circumstances and the quality of the communal space being provided where meeting the standard is shown to not be possible.	No change
6.2 Housing	BH13	Apartments for London, Wembley Towers Limited (owners of Wembley Point and surrounding land) and Stonebridge Real Estate Development Ltd (Unisys site owner)	Paragraph 6.2.134 states that where sufficient private amenity space cannot be provided the remainder should be supplied in the form of communal amenity space. This should include explicit guidance as to how these exceptions are to be achieved.	This is not considered appropriate as the current wording allows for flexibility for the developer to propose a solution to the Council along with an appropriate justification. Each solution will vary depending on the characteristics of the site and extent to which the target is not being met individually or in total.	No change
6.2 Housing	BH13	Quintain	Policy should be amended in light of increased housing targets.	Noted. The standard has applied to Brent over the last decade and	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Policy is outdated and onerous, if a local policy on this is to be included it should be more detailed and related to unit sizes. It is also not reflective of the number of people using the space.	for the most part has been shown to be able to be applied in high density developments. Other aspects such as the Urban Greening Factor indicate the need to provide open space/ planted areas. The Council considers its approach sufficiently flexible to take account of site circumstances and the quality of the communal space being provided where meeting the standard is shown to not be possible.	
6.2 Housing	BH11	Greater London Authority (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.	This policy seeks to ensure that the minimum space standards can apply to the new dwellings provided as part of any conversion which will need to include a 3 bed which is why it has an emphasis on such large dwellings. The Council does not consider complete removal of 3 bed+ policies which would otherwise be promoted by the GLA through its policies as tenable to meet local priority needs as identified in the Brent SHMA.	No change
6.2 Housing		Andrew Clayfield	Car free housing should be supported in PTAL4 areas, but consideration of trades parking is needed both for those residents employed in trades and for residents who need work to be done to their property.	Policy BT3 outlines the need to provide servicing space which will include the provision of space for trades people. In relation to occupants, it is not considered appropriate to incorporate a specific standard in car free	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				developments on the basis that trade's occupants with their own vehicle might live in a development. In those with spaces the trades person will have the ability to purchase if spaces are not allocated to particular properties.	
6.2 Housing		Rachelle Lennard	Affordable housing is obviously needed, but it needs to not be detrimental to established residents.	Developments will be expected to be sympathetic toward existing residents and local character to reduce the potential for adverse impacts.	No change
6.2 Housing		Robert Donovan	Brent is already very overcrowded particularly in many areas that have become Private Landlord HMO areas. More housing will substantially add to this where social infrastructure does not have the capacity to support it.	Noted. Brent has a significant housing target to help meet the needs of local people and those of the Greater London area. Developers will be expected to help contribute to the delivery of social infrastructure. Where appropriate the infrastructure requirements for specific sites are included within the site allocation text. Policy BSI1 states the council's promotion and support for the retention of existing and the development of new social infrastructure. The Infrastructure Delivery Plan will help to identify need and methods of delivery.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.2 Housing		North Brent Parks and Neighbourhood Forum	Care should be taken in the use of 'RCF' Refractory Ceramic Fibres which are used to create fire-resistant materials in cladding. As was the case with asbestos the implications might not been known.	The safety of building materials is a matter for building regulations and other regulatory regimes associated with health and the use of chemicals. It is not a planning matter.	No change
6.2 Housing			Higher rise infill housing should be considered more of an option. New builds should not have small windows.	The Council considers that it has the balance of additional height within priority areas as appropriate. Window size in new builds takes account of a variety of factors, including occupants' access to natural light, occupier privacy/ amenity and that of neighbours through potential over-looking and also the need to reduce energy consumption.	No change
6.2 Housing		Divia Patel	Less private rent - more owner-occupiers	Rented accommodation helps compliment the provision of owner occupied properties and is relied upon by those who are unable to afford to purchase their own home. It is the ambition of the Council to deliver mixed tenure developments which help meet a range of needs. The Council is promoting the delivery of Build to Rent properties to help make rented accommodation more competitive which will hopefully bring down rent and help standardise the market. The	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				Council recognises the important role in the delivery of build to buy properties in creating a sense of community and stability within an area.	
6.2 Housing		Harini Boteju	No information on co-housing and co-living. This should be part of Brent's Local Plan given the cost of properties and changes in how people want to live together to reduce costs and not be alone-similar to a HMO but not quite.	Co-living schemes are in their infancy in terms of provision across London. Some are self-contained, some are shared living arrangements. The Council recognises that they may have a role to play and would support them where they do meet high standards in terms of accommodation and management. It considers that the policy on accommodation with shared facilities provides an appropriate policy tool through which to assess these applications. Brent has historically proved to be an area where unscrupulous landlords take advantage of tenants. It more recently has had discussions with numerous small-scale operators who are keen to promote co-living for professionals. Many of these schemes essentially seem to be HMOs that provide lower quality standards of accommodation in the name of a more affordable product. The Council does not want to stifle innovation for good quality products and as such considers that any policy that	Amend 6.2.75 to include reference to shared living.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				<p>would not do this is likely to be very general and be of little merit. It can however add reference to co-living in the chapter as a form of meeting need which it will support where a high amenity living environment will be provided for occupants.</p>	
6.2 Housing		Harini Boteju	<p>No information on co-housing and co-living. This should be part of Brent's Local Plan given the cost of properties and changes in how people want to live together to reduce costs and not be alone-similar to a HMO but not quite.</p>	<p>Co-living schemes are in their infancy in terms of provision across London. Some are self-contained, some are shared living arrangements. The Council recognises that they may have a role to play and would support them where they do meet high standards in terms of accommodation and management. It considers that the policy on accommodation with shared facilities provides an appropriate policy tool through which to assess these applications. Brent has historically proved to be an area where unscrupulous landlords take advantage of tenants. It more recently has had discussions with numerous small-scale operators who are keen to promote co-living/shared living for professionals. Many of these schemes essentially seem to be HMOs that provide lower quality standards of accommodation as a more affordable product. The</p>	<p>Amend 6.2.75 to include reference to co-living as a form of development that may meet needs.</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				Council does not want to stifle innovation for good quality products and as such considers that any policy that would not do this is likely to be very general and be of little merit. It can however add reference to co-living in the chapter as a form of meeting need which it will support where a high amenity living environment will be provided for occupants.	
6.2 Housing		Philip Grant	Policies MUST deliver on their promise of more, good quality and genuinely affordable homes for the many Brent residents who need them, especially families.	Policy BH5 specifies the need for developers to provide a certain percentage of affordable housing, and the tenure split which would be deemed acceptable by the Council. Through this policy, Brent is putting more emphasis on the delivery of the genuinely affordable Social Rent and London Affordable Rent tenures, as opposed to maximising less affordable tenures at the expense of these. It has to be emphasised however that on the basis of current limited state funding models that provision of genuinely affordable homes to meet all recognised needs will not occur.	No change
6.2 Housing			No towers - they are anti-social and unsafe Affordable places should be prioritised for local people, first	Policies within the London Plan better address safety aspects and applications will be given a high level of scrutiny on this matter. Tall buildings are necessary within	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			time buyers, and young people, starting their life and a family	the borough, given limited land availability, to help meet the significant housing targets set by the Mayor. Social affordable housing is more often required to be offered to people on the Council's waiting list. Intermediate and low cost homes generally are offered on a London wide basis due to the funding requirements of the Mayor of London. These favour first time buyers, who are more likely to be younger and therefore have started or be able to start a family.	
6.2 Housing		Kensal Rise Residents' Association	Recognise the key aim to provide more homes, the majority of which will not be in the Kensal Rise area. 50% affordable housing supported, with the council being robust on financial viability.	Noted.	No change

SOCIAL INFRASTRUCTURE

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.3 Social Infrastructure	BSI1	Ashleigh Bell	Alperton needs more doctors surgeries, nursery schools, sports centres, theatres, supermarkets, pharmacies, coffee shops and artisan stores.	It is recognised that the new development planned in Alperton will require social infrastructure to support it. The Council will liaise with appropriate social infrastructure providers and where clarity on requirements can be identified, this will be included either in site allocations or within the Infrastructure Delivery Plan that will updated on an on-going basis.	No change
6.3 Social Infrastructure	BSI1	Penny Bishop	Community facilities should be open to everyone	The plan seeks to ensure efficient use of community facilities for example Policy BSI1 through Community Use Agreements seeks to ensure schools are available to the wider community for sporting and other activities that would benefit the local community.	No change
6.3 Social Infrastructure	BSI1	David Pearson	Current infrastructure is reasonable although there should be a more visible police presence.	The Council works closely with the Metropolitan Police Service as a body which is well positioned to provide up to date information on local circumstances. However, it is not within the remit of the local plan to allocate police resources.	No change
6.3 Social Infrastructure	BSI1	Alison Hopkins	East place will require at least two more primary schools, another secondary, two more doctor's surgeries. Libraries and pubs have recently been closed.	Need for social infrastructure will be assessed as part of an Infrastructure Delivery Plan. Schools places are assessed as part of School Place Planning	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				Strategy which was recently adopted. On-going liaison with the education service will identify the appropriate number and location of education facilities required, the same is true with the CCG for GP practices. Library closures were as a result of austerity funding limitations and a re-organisation of the service. The Council now has greater control over limiting the loss of pubs through development, although it cannot prevent their closure.	
6.3 Social Infrastructure	BS11	Eileen Inkson	East place needs more cafes, restaurants and pubs, as well as children's centres and community centres.	Need for social infrastructure will be assessed as part of the Infrastructure Delivery Plan and will be reliant on the availability of funding to support its delivery.	No change
6.3 Social Infrastructure	BS11	Harini Boteju	The policy should set out how to assess whether community space is no longer in demand in order to provide certainty for local residents and developers	Given the variety of social infrastructure that the policy covers it will be difficult to be definitive on this in terms of detailed policy criteria, although it is agreed that some commentary in the policy justification would be appropriate to provide greater clarity.	Amend the policy justification to include reference to requiring evidence using accepted methodologies for the social infrastructure of identifying appropriate levels of need.
6.3 Social Infrastructure	BS11	Veenay Chheda	There must be a policy to retain social infrastructure	Noted. This is current London Plan policy and expanded on in Policy BS11.	No change
6.3 Social Infrastructure	BS11	Elizabeth Lindsay	Need more affordable meeting halls and community facilities. Keep the Queensbury Pub as it is. Need more doctors/ GPs.	Need for social infrastructure will be assessed as part of the Infrastructure Delivery Plan and will	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				be reliant on the availability of funding to support its delivery.	
6.3 Social Infrastructure	BSI1	OPDC	OPDC's Social Infrastructure Needs Assessment should inform any needs assessment for health facilities, as well as other projects identified within Brent for expansion to support development of the OPDC.	Noted. The Council will take into account OPDC's Social Infrastructure Needs Assessment.	No change
6.3 Social Infrastructure	BSI1	Kensal Rise Residents' Association	Social infrastructure should be protected, with more active and thorough public consultation when changes are proposed	The policy seeks to ensure social infrastructure is protected. The Plan cannot address how individual organisations can consult when changes are proposed, although anything that is subject to a planning application provides the opportunities for the public to provide feedback on changes to social infrastructure.	No change
6.3 Social Infrastructure	BSI1	Andrew Clayfield	Social infrastructure is important and increases the feeling of being part of a community.	Noted.	No change
6.3 Social Infrastructure	BSI1	Liz Hawksworth	Social infrastructure should be retained	Noted. This is current London Plan policy and expanded on in Policy BSI1.	No change
6.3 Social Infrastructure	BSI1	Martin Francis	Support. Should add links between College of North West London and proposed apprenticeships in start-ups in a green enterprise zone in Wembley	Support noted.	No change
6.3 Social Infrastructure	BSI1	Department for Education	Welcome the reference within the plan to support social and community infrastructure in BSI1. It	The section references the Draft London Plan education policies,	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			would be helpful if key national policies were referenced within the Local Plan.	which themselves reference national policy.	
6.3 Social Infrastructure	BSI1	Rajiv Bajaria	Details on social infrastructure in the plan are limited. Without concrete details of how it will be provided the plan is not adoptable	The Local Plan sets out strategic policy over the next 20 years and can't contain concrete details on how all infrastructure will be delivered. Instead it provides policies to guide how SI should be delivered with details being agreed as part of planning applications. An updated Infrastructure Delivery Plan will provide details on in significant schemes and short to medium term smaller schemes.	No change
6.3 Social Infrastructure	BSI1	Theatres Trust	Policy is welcomed and supported. Wording should be amended to "no longer required" rather than "viable", as viability can be more easily manipulated. The policy should also require the submission of evidence showing genuine efforts to market the facility in question.	Support noted. Agree that wording could be altered to not required and that marketing evidence should be provided.	Change wording from "viable" to "required". In addition the policy justification can make reference to the need to provide marketing evidence of 12 months at realistic prices for alternative community uses to be able to bid prior to its use as a non-community facility.
6.3 Social Infrastructure	BSI1	HUDU/ Brent CCG	Support the inclusion of a specific section on social infrastructure and recognition of the need for additional facilities to support a growing population. It is unclear if the text below the first four clauses applies to all previous points, and what in practical terms is meant by "considered".	Agreed, the text should refer to criterion a. and b. as these relate to where a loss of a social infrastructure facility which could result in the potential overall loss of the site to social infrastructure.	Amend the policy so that the clause below criteria a.-d. to specifically reference occasions where criteria a. and b are being used.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.3 Social Infrastructure		Rita Valentini	There is a lack of social infrastructure in the East place	The need for social infrastructure will be assessed as part of the Infrastructure Delivery Plan supported by appropriate evidence and discussion with providers.	No change
6.3 Social Infrastructure			Queensbury and Kingsbury have seen large amounts of development without any infrastructure to support it.	Noted.	No change
6.3 Social Infrastructure		Annika McQueen	More GP surgeries and sports facilities needed near Church Road.	Need for social infrastructure will be assessed as part of the Infrastructure Delivery Plan and will be reliant on the availability of funding to support its delivery.	No change
6.3 Social Infrastructure		Christine Harvey	More activities/ clubs are needed for young and old people.	Need for social infrastructure capital projects will be assessed as part of a Social Infrastructure Needs Assessment. These types of uses have been lost due to the lack of revenue funding to support their on-going provision. The ability of developer contributions to specifically address this lack of funding is very limited.	No change
6.3 Social Infrastructure		Kishan Vekaria	More early years' centres are needed. More outdoor places providing physical and cultural activities for teenagers are needed.	The Council is working with the education team to ensure that sufficient educational facilities will meet identified needs, whilst amenity space standards support the provision of recreational areas for children in new developments. Specific items for delivery will be	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				set out in the Infrastructure Delivery Plan.	
6.3 Social Infrastructure		Rachelle Lennard	Agree that appropriate social infrastructure is needed as part of new development. More information needed on how this will happen.	The provision of additional social infrastructure will be through a number of means, including the development's related S106 obligations or funds received through community infrastructure levy. Funds will also be available through national and local public bodies one-off and on-going spending schemes. Due to austerity measures however, it should not be assumed that the level of public sector investment will be at levels that might have occurred prior to the recession of 2008 and that all infrastructure requirements/ standards will be met.	No change
6.3 Social Infrastructure		Robert Donovan	Reopen the swimming pools in the borough. Reintroduce park keepers to make parks safe places for children to play. Build hospitals, schools and recreational areas particularly for children	The Council has recently completed an Indoor Sports and Leisure Facilities Needs Assessment. This has identified areas of need and opportunity, with particular emphasis on the delivery of swimming pools. In the short to medium term the redevelopment of Bridge Park will assist in meeting needs. Due to funding shortages the Council cannot make a commitment to reintroduce park keepers. The Council is liaising with the health providers and	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				through projects such as the Northwick Park Growth Area and knowledge of needs integrating this information into the Infrastructure Delivery Plan which will help form a comprehensive plan for its delivery over the forthcoming decades, including the allocation of sites. Planning work with the education department to ensure satisfactory provision of school places, whilst amenity space standards support the provision of recreational areas for children in new developments.	
6.3 Social Infrastructure		Andy Brommage	Vale Farm should be made a centre of excellence as identified in the Neighbourhood Plan. Biodiversity should be enhanced. Barham Park should have an enhanced community use.	Noted. Whilst this is identified in the neighbourhood plan, it does not set out how Vale Farm can reasonably deliver a centre of excellence. The Council is seeking to work with Friends of Parks Groups and other organisations to improve the quality of and biodiversity of parks and open spaces, such as Vale Farm and Barham Park.	No change
6.3 Social Infrastructure		Sport England	Support para 6.3.3, however concerned that BSI1 doesn't give enough protection to sports uses. Sports facilities should only be lost if there is an identified surplus of provision, and not just if there is no shortfall or providing a replacement facility which better meets the needs of existing users as stated in	Support noted. Agree that a broad policy for all forms of social infrastructure does not guard against the loss of one form of social infrastructure to another. Disagree that policy should be separated out to cover the various types, but suggest that policy wording could be strengthened to	Change Policy BSI1 to include: "sports and leisure facilities" after religious in the sentence after criterion d)

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>BSI1. As currently drafted the policy does not take into account growth and future users nor does it consider the requirement for spare capacity. The policy should specifically state that when there is no longer a community need for a facility's current use, the potential of re-using or redeveloping the existing site for sport provision before other uses are pursued will be explored.</p> <p>One policy relating to all forms of social infrastructure does not take into consideration of the various nuances of each provision and does not guard against the loss of one form of social infrastructure to another. The current policy should be separated out to cover the various types of social infrastructure.</p> <p>Para 6.3.7 is supported.</p>	<p>promote sports and leisure facilities as a use considered before other uses are pursued.</p>	
6.3 Social Infrastructure		Sunil Shah	<p>Further housing development will create more traffic and parking problems.</p>	<p>Appropriate mitigation measures will be incorporated into new development to ensure traffic and parking problems are minimised and where possible improved.</p>	No change
6.3 Social Infrastructure		Metropolitan Police Service	<p>The proposed growth in homes, offices and other uses will increase the need for policing and associated infrastructure. This requirement should be accounted for within the Brent CIL.</p>	<p>Noted. The CIL regulation 123 list does not specifically identify police stations, but has been left sufficiently broad through the category of 'community and cultural infrastructure' for funds to be spent</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				on their delivery. The Council will need appropriate input from the police service in identifying the preferred number and location of policing infrastructure needs that is specifically related to increases in needs related to additional development.	
6.3 Social Infrastructure		Francesca Severn	There is a shortage of doctors and A&E facilities, with limited parking and public transport access at existing facilities.	The Council is working with the health providers to ensure that sufficient health facilities will meet identified needs. Specific items for delivery will be set out in the Infrastructure Delivery Plan.	No change
6.3 Social Infrastructure		Florent Leblanc	The Central place needs a new sports centre. Poplar Grove Centre and its environs provides the opportunity to create such a facility. At the very least Barn Hill Open Space should be invested in for football ground and sports equipment facilities. A link to Wembley Park over the railway lines would make these facilities more accessible.	The sports and leisure facilities study identifies the extent of sports facilities required. Additional sports capacity will be created in the redevelopment of Bridge Park, but as yet alternative schemes to help address additional needs have not specifically been identified. There are currently no plans to provide a sports centre at Poplar Grove Centre. A link across the railway line from St David's Road was proposed in the WAAP but did not have sufficient funds for its delivery. Its potential is reflected in this plan.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.3 Social Infrastructure		Shruti Soni	It was not made clear that the Quintain meanwhile uses were temporary, and they should be made permanent. Wembley Library is overcrowded. No new places of worship have been built in the Wembley Opportunity Area. More community facilities are needed within dense developments such as meeting rooms, halls, sports facilities and places of worship etc.	The planning permissions for Quintain's meanwhile uses were clear that they are temporary installations. While these uses cannot be made permanent, new social infrastructure and retail will be provided as part of the Quintain masterplan.	No change

ECONOMY AND TOWN CENTRES

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	6.4.7	Andrew Clayfield	Brent should be installing more fibre networks in buildings and utilities e.g. sewers and should explicitly say that the council will encourage telecoms companies to use Brent's assets to improve connectivity.	London Plan policy S16 Digital connectivity requires new developments to achieve greater digital connectivity than set out in Building Regulations and ensure provision of sufficient ducting space for future digital connectivity infrastructure. Part R1 of the Building Regulations 2010 requires buildings to be equipped with high-speed (at least 30 Mbps) ready in-building physical infrastructure, however new developments using higher-grade infrastructure could achieve connectivity speeds closer to 1 GBPS. The London Plan forms part of the development plan for Brent, and cross-reference will be added. In addition, text will be added to state in applying this policy Brent will expect gigabit fibre connections and ducting allows provides to 'blow' their fibre through ducts. The Council is as part of a wider programme looking to	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				increase the digital connectivity of the borough through Wi-Fi coverage.	
6.4 Economy and Town Centres	BE1	Greater London Authority (GLA)	The Mayor welcomes Brent's ambition to support the delivery of affordable workspace. However, in order to deliver the right types of spaces more detailed policies are required and it is advised that Brent follow the approach set out in Draft New London Plan Policy E3.	The policy is informed by the Brent Workspace Study which identifies areas of demand for affordable workspace by typology and sector. Supporting text and place policies identify locations where affordable workspace is to be prioritised. In addition, the plan includes policy to secure workspace within growth areas. It is considered further detail on application of the policy is best placed in an SPD, where it can be updated more frequently to reflect changes in business needs/demand. The West London Alliance have commissioned further work on affordable workspace in West London, which will inform a future SPD.	No change
6.4 Economy and Town Centres	BE1	London Borough of Harrow	Harrow supports a policy in relation to securing affordable workspace / creative floorspace, where this is secured in the most appropriate locations. Policy BE1 indicates that this will be directed to Growth Areas across Brent, which is a sensible	Noted. Harrow and Brent are part of the West London Alliance authorities currently taking forward a joint affordable workspace study. Further discussions on the implementation of this policy	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			approach. Harrow would welcome the opportunity to discuss with Brent further the opportunities to secure such a product, especially in the contact of jointly administered town centre locations. This would assist in ensuring that the right product is secured in the right location, without prejudicing other likely locations.	in light of findings would be welcomed.	
6.4 Economy and Town Centres	BE1	Quintain	The policy seeks to protect the 'Wembley Educational Quarter' but we are not clear if this is a specific area or a vision for Wembley as a whole. If it is a defined area then it should be shown on the forthcoming proposals map, otherwise if this is part of the vision for Wembley this should be set out in the supporting paragraphs.	In the case of Wembley the location will essentially be defined by the final location of the College of North West London.	No change
6.4 Economy and Town Centres	BE1	St George	Support policy to secure enterprise hubs in the Growth Areas. Growth Areas are logical locations for hubs as they will benefit from being in an area which is a focus for development. Understands requirement for 10% affordable workspace would not apply to re-provided floorspace. Support off-site affordable workspace provision where onsite is not suitable and that a financial contribution towards delivering workspace elsewhere is more beneficial. Requirement for all major developments to prepare an	Support noted. Guidance is being prepared on Employment, Skills and Training Plans by the Employment & Skills Team and contact details will be shared with this team for further discussions. The 10% requirement applies to workspace provided through co-location schemes. This policy has been subject to viability testing. Mixed-use schemes in the borough have achieved above the	No change

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			Employment, Apprenticeship and Training Plan, this is supported by St George. Encouraging local people into employment, training or apprenticeships is considered to be a meaningful way for development to support the community. Would like to share experience to inform guidance.	requirement of 10% affordable workspace.	
6.4 Economy and Town Centres	BE2	Amafhh Investments Ltd	Support the policy's acknowledgement that Staples Corner SIL is suitable for "Intensification through co-location". The policy needs to be clear that the "net increase in employment floorspace" does not apply to individual development schemes. Policy BE2 should also include details of the complementary uses which would be acceptable in the Staples Corner Growth Area, including hotels, banqueting/conference and community/cultural facilities.	In accordance with London Plan policy E7 intensification and co-location at Staples Corner would be subject to a comprehensive master planned approach, which resulted in a net increase in employment floorspace. Co-location through individual development would not be compliant with policy and would not be supported. The need for additional uses would be identified through the comprehensive masterplan, but employment, housing and supporting community facilities would be the priority. Without clarity on where additional employment space will be provided, schemes which do not meet the 0.65 ratio/ replacement of existing (whichever is higher) will not be acceptable.	No change

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6.4 Economy and Town Centres	BE2	Christine Harvey	Good for start-up businesses and cuts down commuting.	Support noted.	No change
6.4 Economy and Town Centres	BE2	David Pearson	Agree with encouraging intensification of industrial land at East Lane Business Park but am opposed to such intensification at Northwick Park if it leads to a loss of open space and industrialisation of the area.	Proposal for intensification only applies to existing SIL and LSIS. The site allocation for Northwick Park protects open space. The priority for this growth area is improvement to the hospital, university and housing. It is not identified for industrial uses.	No change
6.4 Economy and Town Centres	BE2	DB9 on behalf of R55	The recognition that co-location and residential development can support provision of new employment space, plus provide additional housing and be part of a regeneration/ place-making agenda is welcomed. R55 is currently seeking the comprehensive redevelopment of the Site at 370 High Road, and 54-68 Dudden Hill Lane, which forms part of the Church End LSIS, and have been engaged with Brent Council for over 2 years in detailed planning discussions. These proposals which are subject to a planning application should greatly inform the site allocation given their advanced stage. The broad aspirations of the Council as they relate to Church End and the Chapman's and Sapcote Industrial	The Council understands the frustrations of R55 in relation to the site, both the Council and the applicant entered into dialogue a considerable time ago and have sought to achieve a development which though not strictly in accordance with the Local Plan's policy designation for the site will introduce a number of other benefits which might well on balance warrant a departure from policy. Nevertheless, circumstances have changed significantly in relation to industrial needs and the strategic policy requirements as set out in the draft London	The policy is being amended to be consistent with the emerging London Plan policy on affordable housing provision where there is no net loss of industrial floorspace.

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			<p>Estate are supported. The strict and rigid drafting of Policy BE2, and the site-specific designation which mirrors the main Policy, will without doubt severely hinder the delivery of the Council's vision for Chruch End and the sites. BE2 takes its lead from the draft London Plan which has significant objection on its employment policies. The requirement for 50% affordable housing not subject to viability assessment will impact on delivery, particularly in the context of other policy requirements related to residential development. The requirement to increase industrial floorspace is also too onerous not taking into account operator and site specific characteristics. Re-provision of employment should be provided flexibly.</p>	<p>Plan. It is agreed that the draft London Plan has much objection and has been subject to change, for example in relation to affordable housing, which the Council will address in amendments to policy BE2. Nevertheless, the need at the very least to prevent overall loss of employment space across the borough on designated employment sites is evident when taking account of the Council's own evidence base from 2015 and 2019. The Council's policies on BE2 and site specific allocations reflect the need to be in general conformity with what will be an adopted London Plan by the time the Local Plan comes to adoption. As such whilst it has concerns about the overall deliverability of the London Plan's policies 'provide capacity' it considers it has pushed as far as can reasonably be expected at this stage for local flexibility to apply in relation to co-location sites.</p>	

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6.4 Economy and Town Centres	BE2	Greater London Authority (GLA)	<p>Welcomes Brent’s ambition to intensify much of its industrial land in recognition of its classification as a ‘provide capacity’ borough. The policy should recognise that the report, London Industrial Land Demand 2017 (CAG Consultants) illustrates a need for Brent to provide in the region of 43ha (or a locally evidenced quantum) of industrial land up to 2041. The Brent Employment Sites Analysis (November 2018) indicates that nearly all designated industrial sites within the borough operate at below the optimum plot ratio as set out in the London Plan and should these sites be increased to 0.65 this could result in an increase of 356,105 sqm of floorspace. It is not clear how some areas of SIL and LSIS in policy BE2 have been selected for intensification or co-location while others have not, or a current capacity analysis to suggest how much industrial floorspace could be gained through this process across the whole borough. Further work should be conducted which builds on Brent’s industrial land evidence and analyses the potential for increasing industrial floorspace capacity across whole SILs/LSISs based on the potential redevelopment of individual industrial sites.</p>	<p>The West London Employment Land Review (WLELR) (2019) provides local evidence on industrial land demand. It has been commissioned by the West London Boroughs of Brent, Barnet, Ealing, Harrow and the OPDC. It identifies a need for a further 0.6ha of industrial floorspace in Brent, driven largely by demand for logistics. Brent will seek to exceed this figure and increase industrial floorspace by intensifying SIL and LSIS to achieve a plot ratio of 0.65 in accordance with the London Plan; seek increased industrial floorspace where non-designated industrial sites are redeveloped; securing new employment floorspace in growth areas and through the diversification of town centres. Furthermore, the OPDC is taking forward intensification within Park Royal which will further increase industrial floorspace in the borough. The WLELR includes a market analysis which identifies the sites need to protected solely for</p>	<p>6.4.9 The London Plan identifies Brent as having potential to provide additional employment floorspace capacity. To achieve this, we will need to make better use of our industrial sites and secure additional employment floorspace elsewhere. This will be through their intensification of SIL and LSIS to increase plot ratio to 0.65; seeking an increase in employment floorspace on non-designated industrial sites; securing new employment floorspace in growth areas and through the diversification of town centres. 6.4.19 The London Plan identifies Brent as a provide industrial capacity borough. Demand is identified in the use classes B1c, B2 and B8. The West London Employment Land Review (WLELR) identified demand for an additional 0.6ha of industrial floorspace, primarily to meet projected demand for logistics. The London Plan Industrial Land Demand Study identified demand for</p>

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				<p>industrial uses to meet the strategic need for logistics, and a viability appraisal to identify which sites could intensify through multi-storey industrial development, and on which sites co-location will be needed to cross-subsidise intensification of industrial floorspace. The findings of the WLELR and the Brent Industrial Land Audit has informed the identification of potential sites for co-location. The detail on why sites have been identified as suitable or unsuitable is contained within these studies. The policy is clear that co-location on the identified sites would be subject to further work including a comprehensive masterplan demonstrating all aspects of London Plan policy E7 could be achieved. Further text to clarify the approach has been added to supporting text.</p>	<p>43ha. Brent is committed to increasing industrial floorspace to support growth in business and employment. Currently, many of the boroughs industrial sites are underutilised and include non-industrial uses. London Plan policy E7 requires development in SIL and LSIS to increase industrial floorspace to achieve a plot ratio to 0.65. Such intensification will be instrumental to increasing industrial floorspace in the borough. Additional capacity will also be secured by increasing floorspace on non-designated industrial sites (policy BE3), securing workspace in growth areas and secondary frontage of town centres (policy BE1 and BE4), and intensification of Park Royal which is being led by the OPDC. In combination, this has potential to provide an additional x ha of industrial floorspace.</p> <p>6.4.20 London Plan policy E7 states the industrial uses within SIL or LSIS are to be</p>

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					<p>intensified. This will deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing. The WLELR identifies whilst demand and viability will support intensification of industrial uses in some areas of SIL and LSIS, in others co-location is needed to incentivise intensification. Policy BE2 is needed to sets out Brent's approach to co-location and intensification based on an analysis of SIL and LSIS in the WLELR and Brent Industrial Land Audit. Policy BE2 is a starting point which identifies where co-location could be appropriate, but this would be subject to demonstrating the criteria in London Plan policy E7 could be achieved through a masterplan-led approach. Critically, it will need to be demonstrated co-location would achieve a plot ratio of 0.65. The council will work with its partners to develop masterplans for Church End, Neasden and</p>

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					Staples Corner. Where masterplans are developed, the developer will need to work closely with the council and GLA from the outset. Masterplans will need to be produced in accordance with the GLA Practice Note: Industrial intensification and co-location through plan-led and masterplan approaches.
6.4 Economy and Town Centres	BE2	L&Q	L&Q supports the identification of SIL and LSIS that is appropriate for co-location, as set out in Policy BE2. Further information on the reasons for identifying specific SIL and LSIS designations as appropriate or inappropriate for co-location. The policy should also allow for flexibility so that applicants could justify the intensification of sites within any SIL or LSIS designation through co-location if circumstances change over the plan period or if it could be demonstrated that such development would not impact the function of the wider area for industrial use	Further information on the reasons SIL and LSIS have been identified for intensification and/or co-location is contained within the Brent Employment Site Analysis study. This is informed by the West London Employment Land Review. There are some sites which need to be retained in industrial use due to their strategic function. For example, areas of Park Royal and Wembley SIL which have a strategic function in meeting the demand for logistics, and areas of LSIS which contain waste sites and essential utilities.	No change

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6.4 Economy and Town Centres	BE2	Mary Duffy	Concern height of development including co-location will impact on character area and result in overshadowing. Example given of Brick Reclaimers Yard on Coombe Road, adjacent to McDonalds.	Any development would be subject to other policy criteria including design policies on height and impact on amenity.	No change
6.4 Economy and Town Centres	BE2	Neil Zussman	Support aim but other factors should be considered including character of area, atmosphere.	Support noted. Any development would be subject to other policy criteria including design policies.	No change
6.4 Economy and Town Centres	BE2	OPDC	OPDC supports the aspiration for intensification of B1c, B2 and B8 uses. A similar approach is being applied through OPDC's Local Plan. It would be helpful to clarify that, for sites within the SIL/LSIS areas identified in the West London Waste Plan (WLWP), the policies in the WLWP would apply. This is needed to ensure that sites are safeguarded for waste in line with the policies set out in the WLWP.	Agreed. West London Waste Plan to be included in list of relevant policy and site allocations to be added to the policies map.	Reference to West London Waste Plan made on relevant allocations as also shown on the policies map.
6.4 Economy and Town Centres	BE2	Renu Kaul	This is very beneficial to communities and reduces car usage. In Sudbury Town, such proposals and developments should not compromise the low-rise character of the area.	Support noted.	No change
6.4 Economy and Town Centres	BE2	Savills on behalf of Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial)	Kingsbury Industrial Estate is more appropriate for intensification through co-location, rather than to be solely retained as industrial intensification.	The Kingsbury Industrial Estate has not been significantly compromised through permitted development introducing	No change.

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		Nominees Limited with an interest in Kingsbury Industrial Estate	<p>The site contains no designated heritage assets, is close to facilities and social infrastructure and public transport connections. The low level of public transport accessibility should not count against its identification for residential use as justified in the IIA. Vehicular movements from residential will be insignificant compared to the current alternative proposed of intensification of employment. The existing estate has a poor relationship with its existing residential neighbours which could be better transitioned through redevelopment of a mix of uses. The provision of dwellings will assist in meeting the London Plan housing target and could be addressed through a masterplanning exercise.</p>	<p>residential uses into it. It is a relatively self-contained estate that has a good representation of a wide range of business use class employers and very low levels of vacancy. It is a viable employment area. Its public transport accessibility levels are low and as such it is not a place that the Council would seek to encourage significant residential development. Whilst the London Plan sets a high residential target, it also identifies Brent as a 'provide capacity' borough for industrial land/floorspace. This will require a range of types of sites, including those which are for industrial uses that might not sit well with adjacent residential properties in close proximity. Given the relatively discrete nature of its employment use, it is considered that this site would better serve meeting employment needs through its identification as an intensification site, rather than one of employment floorspace growth associated</p>	

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				with co-location with residential properties.	
6.4 Economy and Town Centres	BE2	Shruti Soni	The total warehouse space in Brent needs to be preserved.	Policy approach will ensure development results in an increase in employment floorspace and in doing so help to protect warehousing space.	No change
6.4 Economy and Town Centres	BE2	St George	Consider that Northfields (west) is suitable for intensification through co-location; 1. The Brent Employment Site Analysis states that the site has a relatively low plot ratio meaning that there should be a reasonable prospect of accommodating existing employment floorspace through intensification. 2. This site offers a great opportunity to open up and make a feature of the canal. A key benefit of the Grand Union development will be opening up the canal to the community. 3. The canal towpath forming part of the site's boundary connects directly with Paddington basin thereby providing access to central London. It also directly connects with Alperton where the underground station is located. As a result, this towpath connection would promote sustainable modes of transport. 4. There would be an opportunity to connect	The Draft London Plan identified Brent as a borough which is to provide industrial capacity. The London Industrial Land Demand Study identifies demand for and additional 43ha of industrial floorspace, whilst the West London Employment Land Review (WLELR) identifies demand for 0.6ha. Both studies demonstrate a strong demand for logistics due to population growth. The WLELR identifies Park Royal (of which Northfields West forms part) is of strategic importance for logistics. Within the Borough Park Royal and Wembley SIL are identified as best placed to meet the growing demand for logistics, due in part to their	No change

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			<p>redevelopment of this site with Grand Union via a bridge over the canal. The Grand Union development features a network of pedestrian and cycle paths creating high levels of connectivity throughout the development and to the surrounding area. Grand Union will deliver improvements to Stonebridge Park station and increased bus services along Beresford Avenue. It will also deliver improvements to a key section of the Old North Circular road and Beresford Avenue creating a more inviting pedestrian and cycle environment.</p>	<p>access to the North Circular. The study also identifies in prime sites such as Park Royal the rental values being achieved on industrial floorspace will support intensification through multi-storey industrial development. The 6 level light industrial of 16,700 sqm proposed at Northfields east, demonstrates opportunities to meet demand in the vicinity exist through new solutions. The proximity of the canal whilst being an advantage for residential development, would also benefit industrial users. Both as a walking and cycling route for employees, but also as a potential sustainable transport mode for freight.</p>	
6.4 Economy and Town Centres	BE2	TfL Commercial Development	<p>TfL CD supports Policy BE2 in principle, including the allocation of Alperton North Locally Significant Industrial Site (LSIS) as a site suitable for intensification through co-location, primarily for residential alongside industrial land uses. However, we consider that both Alperton Central and South's LSIS should also be designated for co-location intensification, given their allocation alongside Alperton North</p>	<p>Alperton South contains a waste site allocated in the West London Waste Plan. Given that the boroughs waste apportionment in the draft London Plan has increased this waste site will need to continue to be protected, and additional capacity will need to be found. As such the site is not considered appropriate for</p>	No change

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			within site allocation BSWSA1. This would potentially allow for greater residential provision from the combined site allocation, helping to contribute towards Brent's identified housing need.	co-location. In terms of Alperton Central, the introduction of residential and other sensitive uses would impede the operation of some of the businesses currently operating from the site, including the Police Traffic Unit. In the absence of a strategy or evidence these uses can be relocated it is not considered the site is appropriate for co-location at this time.	
6.4 Economy and Town Centres	BE2	Travis Perkins	Travis Perkins has a site in the Staples Corner SIL which is identified by Policy BE2 as a suitable SIL for intensification through co-location, in line with Policy E7 of the Draft London Plan (2017). Support mixed use redevelopment of their sites where appropriate, but the existing builders' merchant must be protected. Suggest policy is amended to ensure protection of existing businesses within the SIL 'provision of suitable business space to ensure retention of the existing occupier on site or relocation to an agreed alternative site within the vicinity, unless otherwise agreed with the existing occupier.'	It is considered this is covered by existing text in policy which states: 'proactive engagement with existing businesses to seek to retain them on site where possible, and support for any businesses that cannot be incorporated to relocate off site.'	No change
6.4 Economy	BE2	UK & European Investments	Policy BE2 should be amended so it seeks that development at the	Brent is identified as a provide capacity borough	Text to be deleted - 50% affordable housing;

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and Town Centres			Honeypot Lane (Lowther Road) LSIS delivers 'no overall net loss of industrial floorspace capacity', as per the definition in the draft London Plan. Other designated industrial land will remain identified for 'intensification' and so can 'provide capacity' for industrial floorspace in the Borough, as per the draft London Plan. Policy BE2 should be amended to clarify that affordable housing will be sought from development proposals as per the draft London Plan. It should specifically state that '50 per cent affordable housing will be sought where proposals delivering net additional homes on industrial land would result in a net loss of industrial capacity.	and all SIL and LSIS sites currently have a plot ratio below 0.65. As such an uplift will need to be sought across all sites. As such reference to the requirement for 50% affordable housing has been removed.	
6.4 Economy and Town Centres	BE2	Washington Young LLP (on behalf of owners of a site within Kingsbury LSIS)	NPPF paragraph 118 states local planning authorities are encouraged to consider introduction of residential floorspace above existing commercial/employment floorspace. There is no specific suggestion that this should relate solely to commercial/employment floorspace falling outside recognised employment zones such as the Kingsbury LSIS. It is considered that the policy wording and reasoned justification to DM14 is now too narrow and inflexible. Moreover, para 118 is a material consideration that should be taken into account as the	Brent's Local Plan must be in conformity with London Plan policy to be found sound. Draft London Plan policy E7 allows for co-location on LSIS where this is part of a masterplan-led approach encompassing the entire LSIS, resulting in a plot ratio of 0.65ha in industrial floorspace being achieved. It specifically states redevelopment through ad hoc planning applications will not be acceptable. Given that the emerging London Plan	No change

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			latest ministerial thinking. It is considered that planning application reference 17/4582, if approved, would set a positive precedent by establishing a robust principle that redevelopment should neither prejudice future operational business activity nor result in significant reduction of existing employment floorspace.	identifies Brent as a borough to industrial floorspace capacity we are not in a position to release areas of LSIS and the scheme promoted in planning 17/4582 would not meet the requirements of London Plan policy E7.	
6.4 Economy and Town Centres	BE3	Mary Duffy	On the Veetec site it would be nice to have purely residential and no higher than 5 storeys so that it blends with the adjacent streets that have Victorian and Edwardian houses. Opposed to commercial units on ground floor and tall buildings around Neasden Station. Concern tall buildings in Wembley block views of the stadiums.	The London Plan requires Brent to provide additional industrial capacity. To achieve this there can be no loss of industrial floorspace, and any redevelopment of LSIS for mixed-use development will be subject to an increase in industrial floorspace. The Local Plan is informed by a Tall Building Strategy which has assessed the suitability of locations for tall buildings. The design chapter includes a policy to protect views of the stadium.	No change
6.4 Economy and Town Centres	BE3	Greater London Authority (GLA)	Amendments to the Brent's Policy BE3 should seek to retain B2 and B8 uses in accordance with Draft New London Plan Policy E7 which states that mixed use and residential proposals on non-designated industrial land should prioritise the retention of existing B2 and B8	Policy E7 seeks the retention of B1c, B2 and B8 floorspace. Policy E7 is explicitly referenced in policy so its wording has not been repeated.	No change

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			capacity, either through the mixing of uses or through a process of intensification.		
6.4 Economy and Town Centres	BE3	Jeremy Biggin	Affordable workspace should be secured on all new developments, provided design guidelines allow for increased density and scale.	In securing affordable workspace there is a need to consider the impact on development viability and also if the development will result in useable space. The Local Plan prioritises securing affordable workspace in growth areas on schemes above a set threshold and to mitigate against loss of existing workspace in areas of identified demand. Policy has been subject to viability testing.	No change
6.4 Economy and Town Centres	BE3	St George	The requirement for Managed Affordable Workspace is considered to be onerous. Objects to requirements in paragraph 6.4.27 stating where managed affordable workspace is proposed, evidence of an agreement to lease the space to a Managed Workspace Provider should be provided to demonstrate that the workspace is affordable. It	The London Plan identifies Brent as a borough which is to provide additional industrial floorspace capacity. As such the Brent Local Plan needs to take a strong approach to protecting existing industrial floorspace. However, it is accepted in some circumstances the	Wording amended to Affordable Workspace rather than Managed Affordable Workspace. The council will allow the release of Local Employment Sites to non-employment uses where: a) continued wholly employment use is unviable; or

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			<p>goes on to say that this will be secured via a s106 Agreement and that the Managed Workspace Provider will be party to the s106 Agreement. As negotiations regarding leases should only be undertaken once the proposals have been approved and the full details of the scheme are known. Discussions regarding entering into a lease can be protracted and should not be undertaken as part of the pre-planning or determination processes which have their own defined timeframes. It is considered reasonable that the requirement for affordable workspace should fall away in the event that the space has not been taken up following a specified marketing period. Including the Managed Affordable Workspace Provider as a signatory to the s106 Agreement is impracticable as it could cause issues if Deeds of Variation are subsequently required and the provider is unable to sign for any number of reasons.</p>	<p>redevelopment of non-designated industrial sites for mixed-use development could be acceptable providing it provides an increase in industrial floorspace to mitigate negative impacts. Policy BE3 applies to Local Employment Sites these are small non-designated industrial sites outside SIL and LSIS, embedded within residential areas. Brent's experience is that some residential developers do not have experience of the workspace market, and as such there is a risk space is created which is not fit for purpose and ultimately not occupied, resulting in an eventual loss of industrial floorspace when an occupier cannot be found. This would lead to outcomes contrary to the objective of the policy. As such, it is essential an Affordable Workspace Provider is engaged at the earliest stage to ensure the industrial space is fit for purpose and therefore will be occupied. Should the developer identify a provider not currently on</p>	<p>b) development increases the amount of affordable workspace in the B use class.</p>

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				<p>the council's approved list there is scope for them to apply to be added and this is not an onerous process. Policy BE3 takes forward requirements in existing Development Management Policy 14. This policy approach was tested at Examination in Public as part of the Brent DMP examination in 2015 and was found to be sound.</p>	
6.4 Economy and Town Centres	BE3	Travis Perkins	<p>Our client is the long term lease holder of the TP site on Chamberlayne Road which has a lawful builders' merchant use. A greater level of protection is needed for such uses. Suggest additional policy wording: 'continued wholly employment use is unviable and the existing occupier is relocated to a suitable site in the vicinity; b) development increases the amount of existing employment floorspace on site, suitable space is provided for the existing occupier to remain on the site and additional employment floorspace is provided as Managed Affordable Workspace possible.</p>	<p>Under policy BE3 criteria a, for it be accepted a site is no longer viable it must be demonstrated it has been vacant for 24 months despite active marketing. As such there would be no existing occupier on site impacted. Supporting text on criteria b clarifies as evidence the employment space will be occupied the council will require a letter of agreement from the current employment use operating from the site or a stating their intent to occupy the proposed floorspace, or alternatively affordable workspace. Supporting text will be amended to be explicit this is</p>	<p>6.4.28 As evidence the employment space will be occupied the council will require a letter of agreement from the current employment use operating from the site or a stating their intent to occupy the proposed floorspace. Alternatively, where the existing occupier wishes to instead relocate managed affordable workspace should be provided for start-up companies or 'move on' space for SMEs. B1 (c) floorspace will be prioritised to meet the identified need for this form of employment space in the borough.</p>

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				where the existing occupier has agreed to relocate.	
6.4 Economy and Town Centres	BE4	Alison Hopkins	Bring back a library and community centre to Neasden town centre rather than proposing a reduction in its size.	It is not the Council's intention to invest in more libraries across the borough in the short to medium term, the same of community centres. These types of uses can be accommodated in vacant buildings in Neasden town centre, but it will be for 3rd parties to deliver and support their on-going maintenance/ operation.	No change
6.4 Economy and Town Centres	BE4	Annika McQueen	Strongly agree, better planning for mixed use etc. is required rather than assuming ground floor retail space will be occupied.	Noted.	No change
6.4 Economy and Town Centres	BE4	Christine Harvey	Existing character of buildings should be retained. Conservation is important.	Policy BE7 states the need to retain shop fronts of architectural or historic merit with new proposals demonstrating high quality design which complements the surrounding character. Consideration to this matter is also made in policy BE6.	No change
6.4 Economy and Town Centres	BE4	Daniel Schraibman	The council should be more amenable to changes of use at the periphery of town centres but also think about whether there are opportunities for partnerships with local businesses to help these areas be more welcoming and attractive.	Noted. Policy BE4 notes that 'Unviable secondary frontage on the periphery of town centres will be promoted for employment, social infrastructure and residential uses.' The nine priority town	No change

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				centres with designated town centre managers will be subject to action plans covering a whole range of matters that influence the success of a place and which will involve local businesses.	
6.4 Economy and Town Centres	BE4	David Pearson	Agree provided the essential town centre character is preserved.	Noted.	No change
6.4 Economy and Town Centres	BE4	Elizabeth Lindsay	Investigate reason for town centre decline. Provide more affordable spaces for community groups. Good example is the Auburn community centre in Sydney.	Noted. Brent's town centre decline can be attributed to two main causes: increase use of the internet for shopping which would have previously taken place on high streets; and the competition with nearby larger shopping outlets such as Westfield's in White City, Brent Cross, Barnet, and Ealing. These centres have a larger draw due to their size and variety. Policy BSI1 states how social infrastructure should be protected, enhanced, and promoted. Affordable space is sought for community groups within larger developments. Permitted development rights allow community groups to occupy	No change

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				retail premises without the need for planning permission for 3 years.	
6.4 Economy and Town Centres	BE4	Greater London Authority (GLA)	Policy HC6A of the London Plan states that boroughs should develop a vision for the night time economy for those areas with significant night time activity. Therefore, the GLA supports policy BHC4. However, this could be undermined by policy BE4. A more flexible approach should be taken which helps diversity the night time offer with the promotion of A4 uses. Policy bE4 should be amended to be more flexible and in line with policy SD6B of the London Plan. The GLA encourages a collaborative approach in the meeting of strategic goals.	The Council has used advice on the extent of primary frontages provided in the Retail and Leisure Needs Assessment supporting the Plan. This considers the appropriateness of specified primary frontages whose role is to support town centres through the provision of a retail core. In some cases, these frontages have been reduced to reflect the changing nature of town centres. Most town centres contain a significant amount of secondary frontage where A4 and A5 uses currently exist and allow the opportunity to provide more. It is considered that the risk to plans for the night time economy within centres is likely to be very limited as a result of the potential limitations of policy HE4 and that retention of a day time retail core is also an	No change

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				important part of sustaining the vitality and viability of a town centre.	
6.4 Economy and Town Centres	BE4	Kensal Rise Residents' Assosiation	Concern over the change of use from retail to estate agents, e.g. Chamberlayne Road	The Government introduced the ability for A1 retail to change to A2 retail (including estate agents) without the need for planning permission. At this stage the Council does not consider that the impact of this change overall across the borough would warrant an Article 4 direction to remove these permitted development rights. Chamberlayne Road is a vibrant town centre with a changing adjacent demographic that it likely to improve the quality of its offer.	No change
6.4 Economy and Town Centres	BE4	Mary Duffy	Not enough information on proposed uses. Concern over insidious change into residential. Both the Neasden ex-Santander building and Charlie's pub are vacant, Why not turn the Santander into an NHS GP Surgery, or letting the polish Family restaurant have Charlie's pub?	The Council relies on the Brent CCG to provide advice on the amount and location of GP's surgeries. Such uses can be accommodated in town centres. The council's pub-protection policy would need to be adhered to should it be proposed for restaurant use.	No change
6.4 Economy	BE4	Neil Zussman	Support for the better utilisation of vacant buildings, providing town centres are still functional without lost	Agreed. The nine priority town centres with designated town centre managers will be	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
and Town Centres			uses. Town centres should have unique character and sense of place.	subject to action plans covering a whole range of matters that influence the success of a place focuses on the distinctive offer of each of centres.	
6.4 Economy and Town Centres	BE4	Peter Osmon	Concern over declining function of high streets. Proposes every high street should have: necessary social infrastructure, meeting places for a variety of groups, increased pedestrianisation including no parking with servicing undertaken at night. Does Brent have the power and the will?	Noted. National, London Plan and Brent Policy seeks to enhance the quality of Brent's high streets. The range of uses identified are indeed appropriate within a town centre, but rely on more than the Council to support their delivery. Improvements to the pedestrian environment can in some cases be appropriate and the council for example in Harlesden has introduced extensive schemes. The nine priority town centres with designated town centre managers will be subject to action plans covering a whole range of matters that influence the success of a place and which will involve local businesses and address the types of matters identified.	No change
6.4 Economy	BE4	Quintain	The blanket ban on all A4 and A5 uses in Primary Shopping Frontages is overly restrictive with no	The Council has undertaken a full review of the primary frontages in association with	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
and Town Centres			justification provided. If this is to be adopted, a full review of Primary Shopping Frontages will need to be undertaken. This will also hinder the implementation of policy BCH4, specifically in those locations looking to bolster their night time economy. This will reduce Wembley's chance of becoming a Metropolitan town centre.	advice applied in the Retail and Leisure Needs Assessment. For Wembley currently the primary frontages are limited in their extent. For the new Wembley Park development, no frontages are yet defined and it is likely to be in the next local plan review that primary frontages for this area will be defined when it is clearer of the function of frontages following significant redevelopment of the area. The flexibility currently provided is significant in the non-primary frontage areas to accommodate night time economy uses, as such the proposed policy is considered appropriate and will not affect the tenant mix within the Wembley Park development in the short to medium term.	
6.4 Economy and Town Centres	BE4	S Bartle	Strongly disagree that any retail space gets changed or reduced in favour of residential, or that this creates more jobs.	Noted. Town centres are under increasing pressures due to a change in shopping habits, which in some cases is resulting in their general decline. The Council is seeking to consolidate town centre areas, retaining a more vibrant centre whilst	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				increasing flexibility along less viable peripheral sections. New developments will also focus around town centre areas in order to increase its serviceable population and therefore viability. By encouraging alternative employment uses within town centres, such as offices, the Council will increase the footfall during the day, improving its vitality.	
6.4 Economy and Town Centres	BE4	Shruti Soni	The internet economy is having a huge impact on high streets and flexibility of uses is very important.	Noted. Policy BE4 outlines to circumstances in which a vacant unit can change uses, and what those uses should be to help maintain a functioning town centre community.	No change
6.4 Economy and Town Centres	BE4	St George	Support this policy. LBB may wish to promote meanwhile uses as part of large redevelopments as a means of boosting local employment.	Noted. The draft London Plan contains many policies related to meanwhile uses, including on large development sites. Reference to meanwhile uses has also been made in multiple site allocations. In relation to town centres and growth areas, it is recognised that it might be helpful to add reference to meanwhile uses.	Amend Policy BE4 to add a new part on Meanwhile Uses.
6.4 Economy	BE4	Wendy Martin	Disagree with knocking down commercial properties, we need to	Noted. Town centres are under increasing pressures	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
and Town Centres			encourage more coffee shops / restaurants / businesses into the area.	due to a change in shopping habits. This is resulting in their general decline. The Council is seeking to consolidate town centre areas, retaining a more vibrant centre whilst increasing flexibility along less viable peripheral sections. New developments will also focus around town centre areas in order to increase its serviceable population and therefore viability. By encouraging alternative employment uses within town centres, such as offices, the Council will increase the footfall during the day, improving its vitality and providing the opportunity for the types of businesses identified to be sustained.	
6.4 Economy and Town Centres	BE4, 6 & 7	London Borough of Harrow	Support these policies.	Noted.	No change
6.4 Economy and Town Centres	BE5	Alison Hopkins	Support reducing betting and payday loan shops, but the council destroyed the only takeaway in Dollis Hill.	Noted.	No change
6.4 Economy	BE5	Amanda Hervey, Jon Harahap	Policy on gambling and fast food should be more stringent. There should be maximum ratios of these	In conjunction, the criteria outlined in policy BE5 are seen as appropriate by the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
and Town Centres			use classes per sqm on the High Road. There should also be a policy restricting them within a certain distance of any schools.	Council in its control of the proliferation of potentially detrimental uses through the planning process. Takeaways and shisha bars within the vicinity of schools are restricted however as it is illegal of under 18s to be in betting shops this restriction is not considered appropriate.	
6.4 Economy and Town Centres	BE5	Andrew Clayfield	No need to distinguish between betting shops, adult gambling, and payday loan shops. 7% is too high considering Brent's vulnerable demographic. Suggest additional policy which promotes use of first floor commercial buildings for businesses which focus on food delivery as these units can cause dead frontage.	The policy needs to be specific in order to have sufficient standing to justify the Council's decisions during the assessment of planning applications and takes account of the fact that in some centres already have exceeded this limit. So it reflects a compromise which seeks to protect residents, whilst allowing legal businesses to operate. The impact of uses on ground floor frontage is considered at the time of the planning application. In secondary frontages there is greater flexibility to allow such uses, but the council seeks to ensure that such premises do not provide 'dead frontage'.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE5	Andy Brommage	Support restricting unhealthy shops. If a takeaway sells health food that is fine.	Noted.	No change
6.4 Economy and Town Centres	BE5	Annika McQueen	Strongly agree.	Noted.	No change
6.4 Economy and Town Centres	BE5	Ashleigh Bell	Get rid of them all.	Noted.	No change
6.4 Economy and Town Centres	BE5	Christine Harvey	Cultural heritage of Sudbury should be enhanced and promoted to restrict food outlets, betting shops and alcohol outlets.	Noted. The enhancement and promotion on Sudbury town centre is supported within the Sudbury Neighbourhood Plan. The restriction of takeaways and betting shops is included within policy BE5. Off-licenses are not controlled by planning, but are subject to alcohol licensing regime. The Council will soon need to review its Statement of Licensing Policy which can potentially address the concerns related to off-license provision.	No change
6.4 Economy and Town Centres	BE5	David Pearson	Town centres should be for professional services and retail rather than these.	Noted.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE5	Elizabeth Lindsay	What is the reason for need for pawnbrokers, payday loans etc.? We should have a collection of food stalls sharing communal seating rather than individual takeaways.	Pawnbrokers and payday loan shops are legal uses which are in demand by a certain portion of the public. Their removal is not within the remit of the local plan. Markets are promoted with local plan policy BE8.	No change
6.4 Economy and Town Centres	BE5	Jeremy Biggin	Reduce gambling shops. Takeaways need stronger guidance under use classes to control them.	Planning cannot remove existing betting shops. Takeaways do now have their own separate use so a greater level of control through policy can now be undertaken.	No change
6.4 Economy and Town Centres	BE5	Kentucky Fried Chicken (Great Britain) Limited	Disagree with criterion A, B, and E of take away section of policy BE5. Heading is incorrect as policy deals with hot food takeaways only, and no other takeaways such as bakeries or cafes where hot food can be taken away. Criterion (a) which proposes a ban regardless of how many exist which, combined with PD rights for change of use from hot food takeaways will likely result in no takeaway establishments within primary frontages; can this be justified? Criterion (b) is based on limited and conflicting evidence for causal link between proximity of hot food takeaways and obesity. This criterion would include primary schools, who's pupils lack autonomy	a) is unlikely to occur. The exceptional nature of existing A3 consents within primary frontages means that they will have strong values/desire for occupation by national multiples. b) similar to the placement of confectionary close to check-outs, notwithstanding the assumed ability of parent control, it is likely that proximity to a primary school is likely to strongly influence choices resulting in greater consumption of takeaways than would otherwise be the case. The early years obesity issues in Brent	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			and are the responsibility of their careers. Criterion (c) increases the minimum separation between hot food takeaways but does not use evidence to justify this, neither does it state what might represent over-concentration.	require intervention of this nature. c) has previously been regarded as an acceptable policy criterion despite the appearance of Kentucky at the examination of the existing policy which is replicated on this matter.	
6.4 Economy and Town Centres	BE5	Mary Duffy	Strongly agree. Also, old advertising space in Neasden is an eye-sore and requires taking down as no longer in use. The same is true of 'let by' signs which are of abundance and create a poor street scene.	Noted. To Let/Let by signs are legally required to be removed 14 days of a let. If they are made aware, the Council's enforcement team may take action against breaches of advertising regulations.	No change
6.4 Economy and Town Centres	BE5	Mary Farrell	Support having fewer fast food outlets and betting shops.	Noted.	No change
6.4 Economy and Town Centres	BE5	Neera Hirani	Policy on gambling and fast food should be more stringent. There should be maximum ratios of these use classes per sqm on the High Road. There should also be a policy restricting them within a certain distance of any schools.	In conjunction, the criteria outlined in policy BE5 are seen as appropriate by the Council in its control of the proliferation of potentially detrimental uses through the planning process. Takeaways and shisha bars within the vicinity of schools are restricted however as it is illegal of under 18s to be in betting shops this restriction	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				is not considered appropriate.	
6.4 Economy and Town Centres	BE5	Neil Zussman	I don't visit any of those types of shops and would like to see shops that are more relevant to me.	Noted.	No change
6.4 Economy and Town Centres	BE5	Renu Kaul	These types of outlets cause misery and family breakdown. Fast food outlets work against national guidelines for healthy eating.	Noted.	No change
6.4 Economy and Town Centres	BE5	S Bartle	Strongly disagree with policy objective to limit betting shops. These shops are prevalent as they are in demand. Concern that limiting takeaway shops might protect established business which is stagnating, stifling potential innovation and variety. Concern that restrictions over shisha bars are a form of discrimination as users are from specific cultures.	Noted. Betting shops have become prevalent due to their addictive nature, particularly in relation to adult gaming machines with large cash prizes and have been shown to have disproportionate detrimental effects on lower income residents who are subject to their close proximity. The criteria are not a moratorium but a check to stop proliferation. Brent has a significant number of takeaway shops and there is sufficient competition to ensure that poorer performing businesses will not survive. Local studies have shown that shisha bars are impacting negatively upon the health of Brent residents,	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				particularly young people who are encouraged to smoke. Shisha bars are not excluded from areas more than 400 metres from a school.	
6.4 Economy and Town Centres	BE5	Shruti Soni	The fewer of these the better, this is probably the least controversial of all the proposals.	Noted.	No change
6.4 Economy and Town Centres	BE5	Wendy Martin	These definitely need to be restricted.	Noted.	No change
6.4 Economy and Town Centres	BE5		Policies should be stricter. 4% is too much of a high street to be betting shops. Policy on food could also be tougher.	The limitations are considered appropriate balancing the need to protect the population whilst allowing legal businesses to trade. The control of what food a premises sells would be extremely difficult to monitor and certainly beyond the resources of the council's planning department.	No change
6.4 Economy and Town Centres	BE6	Kensal Rise Residents' Association	Retaining isolated retail is vital. A framework for judging appropriate marketing for 2 years is required to challenge underhand tactics.	Noted, the Council will ensure that any marketing evidence provided is scrutinised and is robust enough to allow a suitable decision to be made.	Amend the policy justification to include the referencing to marketing for 2 years, rather than the 1 year currently identified.
6.4 Economy	BE7	Andrew Clayfield	Brent should improve Kilburn High Road with shop frontages and	Noted. The improvements to shop fronts included within	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
and Town Centres			signage more sympathetic to the area's culture and heritage.	new developments is supported by policy BE7. The town centre manager will be taking forward an action plan for this centre which can address matters such as signage and unnecessary building clutter.	
6.4 Economy and Town Centres	BE7	Kensal Rise Residents' Association	Forecourt trading adds to the character of Chamberlayne Road. Council policy on high quality design is good but this should not prevent forecourt trading where the pavement is too narrow to support the footfall. The council should ensure pavements are wide enough.	The widening of pavements is not always possible as a retrofit due to existing infrastructure such as roads. Therefore, policy BE7 states in which circumstances forecourt trading will be appropriate.	No change
6.4 Economy and Town Centres	BE9	Amafhh Investments Ltd	Hotel development should be supported in designated areas ideal for intensification through co-location, such as Staples Corner.	Hotels are promoted within locations which are deemed appropriate taking account of national and London Plan policy which prioritise town centres and if appropriate key visitor attractions. Staples Corner currently has neither of these, so is not a priority location in policy terms.	No change
6.4 Economy and Town Centres	BE9	Greater London Authority (GLA)	Promotion of visitor accommodation in Brent's most significant town centres is welcome. However, it should be reflected in Policy BE9 that Draft New London Plan Policy E10 promotes the location of new visitor	Noted. In the Wembley opportunity area, the town centre boundary is extensive and covers areas that have the best access to public transport. Within the Burnt Oak and Colindale	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			infrastructure within Opportunity Areas.	Opportunity Area, all available sites have been identified for residential uses and as such hotel use is likely to adversely affect residential delivery assumptions. Notwithstanding Brent's policy, any applications for hotel can also be considered against the London Plan E10.	
6.4 Economy and Town Centres	BE9	Stonebridge Real Estate Development Ltd (Unisys site owner)	Site allocation BSSA9 has been deemed suitable for the provision of a hotel, however, the site does not qualify as such under proposed policy BE9. This should therefore be amended for consistency of approach through the following amendment: cross referencing to the application of hotels on certain site allocations within policy BE9.	It is agreed that this might cause confusion. As such it is proposed that the wording of the policy takes account of sites allocated in the Plan too.	Amend Policy BE9 second sentence to: "In addition to sites allocated in this Plan, hotels and other visitor accommodation will be appropriate in town centres in accordance with the sequential approach, and will be supported provided they:"
6.4 Economy and Town Centres		Alison Hopkins	There is no detail on type or level of employment. Concern developers may substitute highly skilled jobs for low wage jobs.	For the purposes of applying Local Plan policy re-provision of employment is measured in terms of employment floorspace and Use Class, rather than jobs created. An Employment, Skills and Training Plan will be secured on all major developments which will set out job numbers, type and ensure job opportunities and training	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				is offered to local people both during and post construction.	
6.4 Economy and Town Centres		Amanda Hervey, Jon Harahap	Coffee shops terraces should be supported: Willesden Green town centre would benefit from lower charges to outside terraces. This would help animate the street	Noted. Business rates are not within the remit of the Local Plan. Local Plan policy BE7 states that forecourt trading is permitted where it does not cause obstruction.	No change
6.4 Economy and Town Centres		Amanda Hervey, Jon Harahap	Phone boxes are attracting anti-social behaviour and should be replaced by BT connection hubs. Derelict places and underpasses should be made available as canvasses for art by local schools/artists.	The Council has limited control over phone boxes and other statutory undertakers utilities boxes, but where they are redundant and causing anti-social problems will seek to encourage their removal. The council has limited control over private property. It has sought to ensure that hoardings around developments are attractive and in some cases showcase local artist's work.	No change
6.4 Economy and Town Centres		Andy Brommage	Do not support outline of unit size/employment mix specifications. Sites should be assessed on a case by case basis in order to provide flexibility for future uses.	Noted.	No change
6.4 Economy and Town Centres		David Pearson	Support for the development of strong town centres which should entail the provision of sufficient parking, free for at least one hour.	Noted. Parking requirements within town centres are outlined within policy BT2 which seeks to balance the requirements to support town centres whilst not	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				encouraging unnecessary car use. Parking pricing in this level of detail is not within the remit of the Local Plan.	
6.4 Economy and Town Centres		Elizabeth Lindsay	Could be isolated from community and noise could affect health. Development will need green areas.	Policy states co-location would be subject to development of a high quality design, which will result in sustainable development, well served by community facilities and open space.	No change
6.4 Economy and Town Centres		Greater London Authority (GLA)	As currently drafted, the Plan would not be in conformity with the London Plan due to its release of SIL and LSIS beyond its benchmark, without clear policies to ensure, as a minimum, this capacity is replaced.	The Local Plan does not release SIL and LSIS. It states intensification through co-location will only be supported on certain sites, subject to a comprehensive masterplan approach demonstrating set criteria, including conformity with London Plan policy E7, will be achieved. Supporting text states in calculating minimum floorspace requirements a plot ratio of 0.65 or existing level of employment floorspace will be applied, whichever is the higher.	No change
6.4 Economy and Town Centres		Jeremy Biggin	Supports blending light industrial and residential and removing hard boundaries between Use Classes.	Support noted.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres		Kevin Barry	Improve vibrancy and feeling of safety of high streets, including: Willesden High Road, Harlesden, Kilburn and Cricklewood.	Designing for a safer urban environment is covered within policy D10 of the London Plan. Improvements to the public realm, as required by Local Plan policy BT1 will also contribute to the feeling of safety within the boroughs high streets. These town centres will be subject to Action Plans which will seek to address a variety of interventions to encourage their greater vitality.	No change
6.4 Economy and Town Centres		Liz Hawksworth	Retain existing retail outlets in Chamberlayne and general character of area. Harrow road retail units to be improved.	Noted. Policy BE6 of the Local Plan looks to support the retention of neighbourhood parades providing units are viable. Improvements of Harrow Road retail units is covered within the Sudbury Neighbourhood Plan.	No change
6.4 Economy and Town Centres		London Borough of Barnet	Duty to cooperate on the development of town centres is supported by Barnet.	The Council will work with Barnet to ensure consistency/ complementary approaches to the town centres and developments along and around the A5 Edgware Road.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres		Renu Kaul	Town centres should be analysed individually and in collaboration with local residents, with developments not impacting the integral character of an area.	The nine priority town centres with designated town centre managers will be subject to action plans covering a whole range of matters that influence the success of a place.	No change
6.4 Economy and Town Centres		Renu Kaul	Employment is of paramount importance for the local community to prosper. The term, 'the same amount of employment space' is not sufficiently clear. Skilled jobs should not be replaced by unskilled jobs. Viable businesses should not be replaced with non-viable businesses.	Policy requires the amount of employment floorspace to be increased to 0.65 plot ratio, or the existing, whichever is the higher. The council has no real control on who the occupiers will be within a use class, so cannot require certain types of occupiers. An Employment, Skills and Training Plan will be secured on all major developments which will set out job numbers, type and ensure job opportunities and training is offered to local people both during and post construction.	No change
6.4 Economy and Town Centres		Renu Kaul	Town Centres need to have more places for entertainment for families, children and senior citizens., including: restaurants, coffee shops, cultural venues in music and art.	Town centres does require a broad mix of uses to thrive, particularly in the context of pressures on retailers from special forms of trading and internet shopping. The Plan seeks to provide this flexibility, particularly outside primary shopping frontages.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres		Rita Valentini	Some areas of Brent lack local commercial centres and, rather than focusing efforts on large out posted areas like Staples Corner, efforts should focus on increasing retail floorspace within high PTAL areas with a notable absence of retail.	Noted. The current priority is to enhance existing commercial areas to combat current town centre decline. Provision of new retail floorspace within areas which are not currently established for such uses unless associated with significant amounts of new development that would provide patronage/ sense of place to attract people will not be considered viable at this time by prospective developers and in addition out of town centre locations are not supported by national planning policy.	No change
6.4 Economy and Town Centres		Shruti Soni	Expansion of town centres/retail is not warranted. is proposed expansion backed by evidence of need? Additional leisure facilities, within walking distance, required within Wembley Park.	The Council's Retail and Leisure Needs Study provides the evidence in relation to the future capacity/ needs for these types of uses. Most town centres are likely to go through limited contract of capacity, whilst in some of the more successful there may be some limited opportunities to expand. There are already leisure facilities within Wembley Park which will be added to, plus the redevelopment of	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				Bridge Park leisure centre will add capacity for swimming pool and sports hall provision.	
6.4 Economy and Town Centres		Sport England	Sport is important in creating sustainable urban environments, with benefits including: health and happiness, education, crime reduction, environmental improvements, stimulating regeneration, and volunteering. In addition to these benefits, sports facilities such as gyms provide employment and should therefore be safeguarded as an employment use and should therefore be considered acceptable on employment sites as D2 uses, complementing the surrounding traditional uses and helping to draw in additional investment.	It is recognised that these types of sport use often seek to locate in these areas either due to the availability of larger premises or sites or the comparatively low cost compared to town centres. Brent has been identified as a provide capacity borough for business premises in the London Plan, and has very low employment land vacancy levels. The London Plan prioritises the reprovision/ intensification of Business Use Class employment uses on employment sites. For Brent given the pressures on the need to find additional industrial land/ floorspace the Council does not feel it appropriate to identify flexibility which allows the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				displacement of employment uses to D2 leisure. It will consider applications on their merits, taking account of the range of factors including those identified by Sport England.	
6.4 Economy and Town Centres		TfL Commercial Development	Chapter 6.4 requires specific policy, for clarification of stance, to the conversion/ redevelopment of town centre uses to residential, including vacant units, where its implementation is not of detriment to the function of the town centre. Perhaps as an extension to policy BE5.	Policy BE4 includes the following text: 'Unviable secondary frontage on the periphery of town centres will be promoted for employment, social infrastructure and residential uses.' This is seen as sufficient in dealing with town centre units which are no longer viable, and serves to protect the general function and vitality of town centres. National planning and emerging London Plan policy for instance on small sites development are all supportive of efficient use of town centre premises and residential uses there, as such it is not considered that additional local policy is required.	No change
6.4 Economy and Town Centres		Veenay Chheda	Adult gaming centres, pawnbrokers and restaurants should be limited/ reduced, applying a minimum distance from off licences and pubs.	Noted. The proliferation of these uses is restricted by policy BE5. Whilst in some cases consumption of alcohol might adversely	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				<p>affect a person's judgement and encourage greater use of adult gaming centres, to apply a restriction on the distance between the two is not considered appropriate. Operators of these facilities have a duty of care to gamblers.</p>	
6.4 Economy and Town Centres		West London Business	<p>Making sure that businesses and residents in the borough have access to a fast internet is crucial for the economy of the area and the council should commit to develop a robust digital infrastructure. Welcome the council's commitment to move towards 5G across the borough, but would also welcome a more developed digital infrastructure policy, in particular an explicit commitment to request gigabit fibre connections (FTTP) in all new residential and commercial buildings. This should be supported by ducting on and off the premises that allows multiple service providers to 'blow' their fibre through the ducts. Businesses will typically want wireless connections as back-up, but wired connections as their primary means of accessing the internet.</p>	<p>London Plan policy S16 Digital connectivity requires new developments to achieve greater digital connectivity than set out in Building Regulations and ensure provision of sufficient ducting space for future digital connectivity infrastructure. Part R1 of the Building Regulations 2010 requires buildings to be equipped with high-speed (at least 30 Mbps) ready in-building physical infrastructure, however new developments using higher-grade infrastructure could achieve connectivity speeds closer to 1 GBPS. The London Plan forms part of the development plan for Brent, and cross-reference will be added. In addition, text will be added to state in applying this policy Brent will</p>	<p>6.8.16 Consistent with this objective, London Plan policy S16 Digital connectivity infrastructure requires new developments to achieve greater digital connectivity than set out in Building Regulations and ensure provision of sufficient ducting space for future digital connectivity infrastructure. In Brent in applying this policy, full fibre (FTTP) gigabit capable connection and ducting which allows multiple providers to easily pull fibres through the ducts without the need for costly and disruptive additional digging will be sought. Fibre delivery early in the planning process alongside traditional utilities will be required.</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				expect gigabit fibre connections and ducting allows provides to 'blow' their fibre through ducts.	

HERITAGE AND CULTURE

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.5 Heritage and Culture	6.5.2	Kilburn Neighbourhood Forum	Kilburn Neighbourhood Planning Forum welcomes the strategy's preparation and looks forward to contributing.	Noted.	No change
6.5 Heritage and Culture	6.5.4	Philip Grant	The stadium views have been blighted in recent years which is another example of the Council letting down residents, and the wider public, in matters of Heritage and Culture, in the face of development pressure.	Given the relative open aspect all the way around the stadium following its redevelopment, any development had the potential to affect its views. As such priority views were established. The policy wording on views protection was not very strong and has been addressed in this version of the plan to protect as best as possible those that remain.	No change
6.5 Heritage and Culture	BHC2	TfL Commercial Development	The views should be clearly included within the plan with a clear indication of where taken from and measured.	Agreed. This will be shown in the proposals map.	Amend proposals map to provide clarity on stadium viewpoints/ corridors.
6.5 Heritage and Culture	BHC2	OPDC	Policy BHC2 identifies view 17 (Abbey Road/Grand Union Canal Park Royal) which is located within the area of borough for which OPDC is the local planning authority. The remainder views are located in other parts of the borough. OPDC supports the policy's aspiration to ensure development must not be to the detriment of views of the National Stadium Wembley; however, the justification text for the policy should recognise that BHC2	Noted. The borough would encourage OPDC to consider maintaining this view from the OPDC area when determining planning applications.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>in relation to view 17 will only be implemented to determine applications within the borough where OPDC is not the local planning authority.</p> <p>Amend paragraph 6.5.30 as follows: The London Plan Policy H3 Strategic and Local Views requires local plans to clearly identify important local views. It advises boroughs to use the principles of HC4 London View Management Framework for the management of local views. 17 views have been identified. View 17 is located within the part of the borough where OPDC is the local planning authority. BHC2 will only be implemented in relation to this view for development proposals outside of the OPDC area.</p>		
6.5 Heritage and Culture	BHC2	Philip Grant	Proposed policy BHC2 is welcome but much damage to those views has already been done.	Given the relative open aspect all the way around the stadium following its redevelopment, any development had the potential to affect its views. As such priority views were established. The policy wording on views protection was not very strong and has been addressed in this version of the plan to protect as best as possible those that remain.	No change
6.5 Heritage	BHC2	Quintain	Consider BHC2 preamble wording to be more onerous than existing policy requirements. It is likely to	Noted, but it is not considered that this will undermine what has historically been considered appropriate, only	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
and Culture			have an impact upon densities achieved on sites coming forward around the stadium, particularly those to the east on the industrial estate fringes.	assumptions about the capacity on sites which developers/landowners might have had given the precedent heights being assumed in the Wembley masterplan.	
6.5 Heritage and Culture	6.5.28	Quintain	Paragraph should be amended to refer to buildings immediately adjacent to the stadium rising no higher than its shoulder height.	This is considered appropriate as it has been a long held principle in the consideration of new development proposals. This paragraph will be removed as the plan moves to publication stage, so the information can be added to paragraph 6.5.32	Amend paragraph 6.5.32 to identify that buildings adjacent to the stadium should be no higher than its shoulder height.
6.5 Heritage and Culture	BHC3	London Borough of Harrow	Support policy and ongoing dialogue between the two Local Authorities. Would welcome further discussion on cross boundary strategic issues, such as affordable workspace and town centre management.	The borough would also welcome such dialogue and will commission complementary evidence base work and include similar policies where appropriate.	None specific to this point, however joint working may lead to additional guidance for example on town centres, or affordable workspace strategy, etc.
6.5 Heritage and Culture	BHC3	OPDC	Welcome aspiration to support Harlesden's creative industries and looks forward to helping ensure the town centre benefits from the opportunities provided by Old Oak and Park Royal occur.	Noted and welcomed. Work with OPDC to ensure benefits of regeneration of Old Oak benefit the Harlesden community as much as possible.	No change
6.5 Heritage and Culture	BHC3	Theatres Trust	Welcome policy which extends wider than just culture in terms of venues and also includes workspace. Limited rehearsal space is also a large problem in London. As we as sufficient space, lack of affordability is also a barrier. Cultural uses require appropriate 'employment' floorspace, are	Noted. The Council's policy on seeking to retain local employment sites and other uses in redevelopment may provide the opportunity to accommodate these types of uses.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			compatible with cultural clusters and contribute to the vibrancy of areas.		
6.5 Heritage and Culture	6.5.39	Greater London Authority (GLA)	Draft London Plan policy is HC5 not H5. Policy H5 is not primarily about creative workspaces, it is about cultural quarters, venues and facilities which can promote local regeneration and town centre renewal. The relationship between culture and creative industries is explained in para 7.5.1A of the draft London Plan.	Noted.	Amend reference to draft London Plan to HC5.
6.5 Heritage and Culture	BHC4	Greater London Authority (GLA)	See comment against BE4	Noted.	No change
6.5 Heritage and Culture	BHC4	Quintain	Support policy.	Noted.	No change
6.5 Heritage and Culture	BHC4	Theatres Trust	Welcome support for Brent's night time economy. This policy will be beneficial in delivering the potential food and drink cluster around the Kiln Theatre outlined earlier in the Plan.	Noted.	No change
6.5 Heritage and Culture	BHC5	Mary Farrell	Closed pubs are an eyesore	Noted.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.5 Heritage and Culture	BHC5	Elizabeth Lindsay	Pubs face numerous challenges to survive but often serve as a unofficial community space. Keep Queensbury pub	Noted. The public houses policy seeks to ensure retention of pubs unless there is evidence available that shows retention/ replacement is an unviable option.	No change
6.5 Heritage and Culture	BHC5	Christine Harvey	Parking is important for these pubs	Noted. This will be considered as part of the any application for uses which would diminish the existing provision of spaces.	No change
6.5 Heritage and Culture	BHC5	Mary Duffy	Council could give few remaining Neasden pubs some help cleaning and painting to make them attractive for socialising. Blackbird Hill had a nice pub demolished and flats built. Many years ago the Spotted Dog in Neasden was demolished with no resident consultation and unsightly flats built in an air quality area quite dangerous for the residents.	Noted, the town centre manager is working closely with Planning Enforcement and sites owners to bring the appearance of buildings up to an acceptable standard. The Plan introduced a policy to protect pubs as it was recognised that there was insufficient protection previously. It has to be remembered that permitted development allowed pubs to be turned into other uses without planning controls, as such there was little the Council could do to limit their loss.	No change
6.5 Heritage and Culture	BHC5	Renu Kaul	Specify the criteria for defining a pub that cannot survive. All options to help a pub become a viable business must be explored before any change of use. Pubs provide a meeting place for like-minded local residents to enhance community cohesion.	The viability tests have been developed with CAMRA and are considered appropriate.	No change
6.5 Heritage	BHC5	Andy Brommage	Protecting pubs is good, survival may be down to their management.	Recognised in the policy justification.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
and Culture			Losses results in valuable community centre disappearing.		
6.5 Heritage and Culture	BHC5	Shruti Soni	The document identifies the Torch for development. It should not allow vested interests to allow a pub to fail for development opportunities. Pubs' change of use need to be looked at with extreme caution. Opportunities exist for reconfiguration with a significant food element, successes include Mumbai Junction and this should be test before loss is allowed.	The re-provision of a pub is sought as part of the planning policy. As a relatively contemporary building that has undergone significant internal changes removing all original fixtures and fittings, it is not considered that the quality of the building itself is sufficient to justify its wholesale retention. However, its role as a community space is recognised, which why a replacement public house is required.	No change
6.5 Heritage and Culture	BHC5	Greater London Authority (GLA)	The intention to protect public houses is welcomed. The Mayor wishes to protect those public houses providing a heritage, economic, social or cultural value to local communities or where they make a positive contribution to town centres and/or wider policy objectives. Amendments to policy are required to make this distinction clear.	These matters are considered to be sufficiently covered in the policy criteria which have previously been agreed with CAMRA and in any case the London Plan policies would still apply.	No change
6.5 Heritage and Culture	BHC5	S Bartle	Only circumstances in which a pub 'cannot survive' is related to developer activities such as running to down or forcing occupiers out. Loss of pubs will change the 'general character' of the area, e.g. proposed development of The Queensbury in Willesden Green.	This is not necessarily the case, as the population changes, particularly with different ethnic groups/ faiths placing a lower emphasis on consumption of alcohol as a form of recreation demands will also change. The Council considers its policies sufficiently test scenarios which take account of the viability of pubs.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.5 Heritage and Culture	BHC5	Alison Hopkins	This is sheer lip service. Many pubs supposedly protected have been lost in Brent. Brent Tavern is the latest, one of only two pubs in Dollis Hill ward. It has been demolished, along with well-established and loved shops and our fish and chip shop.	The replacement of the public house is provided as part of the planning permission, and replacement retail space is also provided.	No change
6.5 Heritage and Culture	BHC5	Jeremy Biggin	Toughen the current policy. Easy enough for a patient landlord to demonstrate vacancy.	The viability tests have been developed with CAMRA and are considered appropriate.	No change
6.5 Heritage and Culture	BHC5	Theatres Trust	Support the protection to public houses this will bring in line with paragraph 92 of the NPPF. Pubs provide vital local community meeting spaces and opportunities for coming together. They can also be important venues for supporting and facilitating cultural activities and the performing arts at a community and grass-roots level.	Noted.	No change
6.5 Heritage and Culture		Liz Hawksworth	Include Purves Road be included in a conservation area?	Noted. Formal consultation on the Conservation Area boundary will occur in due course.	No change
6.5 Heritage and Culture		N Kusneraitis	Harlesden needs a dedicated cultural and venue centre which, similar to Kilburn needs specific mention in the Heritage plan. It is very important that those remaining in Kilburn are supported but also that Harlesden town centre has a	The sentiment is understood and the extent to which Harlesden can better promote/ reflect the cultural importance of its history as one of the important reggae centres will be better explored by the town centre action plan and cultural strategy. In advance	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			multi-use venue that appeals to all community members whilst representing its reggae cultural significance. Harlesden should be considered equal in importance as a night time economy as Wembley (both sites), Cricklewood and Kilburn and should have a specific action plan for this.	of this there is limited evidence that can point to a specific requirement for a particular facility and where achieving its delivery would be best achieved through a policy/ site allocation.	
6.5 Heritage and Culture		Elizabeth Lindsay	Agree if conservation covers protection of trees against removal as the tree lined streets are the reason for moving here.	Conservation area status provides an opportunity to consider the merits of works to a tree which would otherwise not be the case unless protected by Tree Preservation Order (TPO). Proposals for removal will consider the value of the tree and its condition. At this stage, the tree may either be protected by TPO, pruning works undertaken, or its removal allowed, subject to re-provision elsewhere.	No change
6.5 Heritage and Culture		Toby Boardman	Support proposals for Malvern Road as set out in the Brent Historic Environment Place Making Strategy.	The potential change is based on the initial thoughts of the Council's heritage officer based on the perception of their heritage value. Any changes to conservation areas will be subject to full consultation and consideration of responses before any final decision is made.	No change
6.5 Heritage and Culture		Susan Bush	Support conservation area extension to incorporate Salisbury Road whose character is at risk on this important road with its mixed building heritage developed in conjunction with the main estate	Noted. Formal consultation on the Conservation Area boundary will occur in due course.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.5 Heritage and Culture		Kilburn Neighbourhood Forum	Policies and decisions within the plan that result in a significant reduction in Brent's rich, cultural and historic environment, specifically in terms of period commercial and residential frontages and park spaces should be avoided. This should also extend to its diverse community reflected in cultural venues and youth recreational centres.	The Plan seeks to achieve this through the policies that it includes.	No change
6.5 Heritage and Culture		Audrey Tom	Brondesbury Park Mansions, 132 Salisbury Road, must be included in the conservation area.	Noted. This will be considered as part of the review of the conservation area boundaries.	No change
6.5 Heritage and Culture		Elayne Coakes	Protect heritage buildings and unprotected frontages from demolition	Demolition of heritage buildings is not allowed unless under-exceptional circumstances. For non-heritage assets, the Council cannot have such stringent controls on loss.	No change
6.5 Heritage and Culture		Barrie Newton	Support proposed extension of Queen's Park Conservation Area to include Salusbury Road, NW6 to protect its character which is under threat. Brondesbury Park Mansions, 132 Salusbury Road, NW6 should also be included in Brent's Local List.	Noted. This will be considered as part of the Heritage Strategy and any review of conservation areas undertaken as part of the statutory requirements required to amend boundaries/ designate new areas.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.5 Heritage and Culture		Gavin Murray	Brondesbury Park Mansions, 132 Salusbury Road, NW6 should also be included in Brent's Local List.	Noted. This will be considered as part of the proposed update of the list by themes, which will include mansion blocks.	No change
6.5 Heritage and Culture		Tristan Cooke	Endorse inclusion of Salusbury Road in the conservation area and of Brondesbury Park Mansions on the Local List.	Noted. The inclusion of areas within conservation areas will be considered as part of the statutory process required for confirming conservation area boundaries.	No change
6.5 Heritage and Culture		Alli MacInnes	Support the inclusion of Credition Road and surrounding streets into a conservation area. The strong Victorian design should be preserved as its character is currently being undermined by uPVC windows and Satellite dishes.	Noted. This will be considered as part of the review of the conservation area that will be subject to a separate statutory process.	No change
6.5 Heritage and Culture		Alison Hopkins	Strongly object to the reduction of the St Andrews and Neasden Village conservation areas.	The reviews of these conservation areas will have to go through a separate statutory process. At that point the Council will formally consider the appropriateness of the existing boundaries, consult on any potential changes/ associated review and character analysis/ design guide and analyse comments before deciding whether to proceed to adoption.	No change
6.5 Heritage and Culture		Tieu Pham	Salusbury Road NW6 should be included within the Queen's Park conservation area. Strongly support a Local List review to include Brondesbury Park Mansions, 132 Salusbury Road as recommended in	Noted. This will be considered as part of the review of the conservation area boundary and the review of the local list.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>the 2015 review due to its high quality and relatively unaltered state.</p> <p>Strongly support the review and update of the Local List to be included as an objective of this Local Plan.</p>		
6.5 Heritage and Culture		Susan Bush	<p>Support prompt confirmation of Brondesbury Park Mansions, 132 Salusbury Road NW6 for inclusion on the local list as recommended in 2015 and the Brent Historic Environment Place-making Strategy Schedule 3.</p>	<p>Noted. Formal consultation on the local list and Conservation Area boundary will occur in due course.</p>	No change
6.5 Heritage and Culture		Adam Gahlin	<p>Salusbury Road NW6 should be included within the Queen's Park conservation area. Strongly support a Local List review to include Brondesbury Park Mansions, 132 Salusbury Road as recommended in the 2015 review due to its high quality and relatively unaltered state.</p> <p>Strongly support the review and update of the Local List to be included as an objective of this Local Plan.</p>	<p>Noted. This will be considered as part of the proposed review of the conservation area and also the Local list, where mansion blocks are likely to be a theme priority.</p>	No change
6.5 Heritage and Culture		James Hope	<p>Support inclusion of Salusbury Road in the Queen's Park Conservation area. The "Local List" is important. It should be kept updated, in particular the 2015 review changes should be confirmed including the addition of Brondesbury Park</p>	<p>Noted. This will be considered as part of the proposed review of the conservation area and also the Local list, where mansion blocks are likely to be a theme priority.</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Mansions at 132 Salusbury Road, NW6 6PD.		
6.5 Heritage and Culture		Elizabeth Gaynor Lloyd	Much of North West has historical significance, the Park itself and link to adjoining areas. Current planning practice is destroying Metro land except for patches of conservation areas.	Noted. This will be considered as part of the Heritage Strategy.	No change
6.5 Heritage and Culture		Mary Farrell	Sudbury Cottages add to the character of the Sudbury area as do the Wembley High Road buildings to Wembley.	The potential change is based on the initial thoughts of the Council's heritage officer based on the perception of their heritage value. Any changes to conservation areas will be subject to full consultation and consideration of responses before any final decision is made.	No change
6.5 Heritage and Culture		Andy Brommage	Sudbury Cottages conservation area should not be removed. The environmental quality of the former conservation areas of Elms Lane & Sudbury Town's environmental quality has been lost over the last 30 years and would not want to see a further loss.	The reviews of this conservation area will have to go through a separate statutory process. At that point the Council will formally consider the appropriateness of the existing boundaries, consult on any potential changes/ associated review and character analysis/ design guide and analyse comments before deciding whether to proceed to adoption.	No change
6.5 Heritage and Culture		Canal & River Trust	The canals, towpaths and bridges over them, are all part of the industrial heritage of our network. Where not already formally designated local policy should recognise their heritage value through local-designation and encourage development to protect	The canal as it passes through Brent is considered to have very little in terms of structures or positive setting of historical significance, particularly outside of what the Trust owns. As such the Council is not currently proposing to identify any locally specific designations. It will however	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			and enhance the historic character of the canals.	be willing to consider specific features suggested by the Trust. Nevertheless, these will mostly be within the gift of the Trust as their owner to conserve/ enhance.	
6.5 Heritage and Culture		Al Jugoo	Overt restrictions placed on property enhancements situated within conservation areas are not addressed. Restrictions on minor building front changes to enable rear and / or loft conversions should be removed.	The Council has to balance up a property owner's rights with the wider good and the statutory requirement to preserve or enhance the heritage asset. In the case of conservation areas or listed buildings minor changes can potentially have significant impacts on the heritage asset either on its own or on a collective basis that ultimately undermine the reasons for seeking to maintain or enhance the asset in the first place.	No change
6.5 Heritage and Culture		Renu Kaul	Retain Sudbury cottages conservation area as part of Sudbury's heritage it is a significant part of the low-rise charm and character of the area. Upgrade Wembley High Street. Remove fast food outlets and betting shops, which attract anti-social behaviour and make it difficult for people to enjoy the high street. Planning and Licensing must ensure that restaurants and food outlets foster and encourage healthy eating. Wembley Central Station redevelopment is a good example of	The potential change is based on the initial thoughts of the Council's heritage officer based on the perception of their heritage value. Any changes to conservation areas will be subject to full consultation and consideration of responses before any final decision is made. An action plan is being developed for Wembley High Street by its Town Centre Manager. Whilst this can be encouraged through other activities of the council, neither the planning or licensing functions can require healthy eating establishments.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			creating significant and inviting, pedestrianised, public open space with mixed use in which the community can easily congregate, walk and use all the services. This in itself, increases footfall and usage.	Noted. high quality public open spaces will be encouraged wherever appropriate in new developments.	
6.5 Heritage and Culture		Veenay Chheda	Important to support local residents in seeking to ensure its retention.	Noted. This will be considered as part of the Historic Environment Place Making Strategy.	No change
6.5 Heritage and Culture		Kensal Rise Residents' Association	Broadly support a "Kensal Rise Conservation Area" subject to greater understanding of properties included on Chamberlayne Road. Welcome the opportunity to add constructively to the created / extension of a design guide for Kensal Rise Conservation Area / Extension of the Queens Park conservation area.	Noted. This will be considered as part of the review of heritage assets.	No change
6.5 Heritage and Culture		Manjul Shah, Mitesh Mashru	Proposals for wider improvement of Vale Farm Sport Ground and adjacent buildings should support cultural diversity and where possible consolidate cultural facilities into a cultural hub for existing and new communities.	Consideration of how Vale Farm can be improved in a manner consistent with the Sudbury Neighbourhood Plan objectives should be undertaken in consultation with the community. If and when it becomes available the output of this work will be incorporated into a site specific policy for the Vale Farm site either in the Brent Local Plan, or an amended neighbourhood plan.	No change
6.5 Heritage		Mary Duffy	Why are Neasden Village and St Andrews conservation areas being	This is the initial thoughts of the Council's heritage officer based on the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
and Culture			proposed for reduction? Suspect it is a roundabout way of adding yet more tall buildings.	perception of their heritage value. Any changes to conservation areas will be subject to full consultation and consideration of responses before any final decision is made. Neither area has been identified as being appropriate for tall buildings.	
6.5 Heritage and Culture		Grace Brown	Why no mention of libraries	The Council has no specific plans to provide new library space, having undertaken a review in provision in the last 10 years.	No change
6.5 Heritage and Culture		Luca Taschini	A specific Willesden Conservation Area design guide should be produced and made available	Noted. This will be considered as part of the Heritage Strategy.	No change
6.5 Heritage and Culture		Victoria Secretan	Support the inclusion of Kensal Rise in Queen's Park Conservation Area in particular Crediton Road. The other Kensal Rise and Kilburn Lane areas identified in the proposal also share a fascinating history which it would be invaluable to preserve, without forbidding socially and aesthetically positive developments.	The potential change is based on the initial thoughts of the Council's heritage officer based on the perception of their heritage value. Any changes to conservation areas will be subject to full consultation and consideration of responses before any final decision is made.	No change

GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.6 Green Infrastructure	6.6.6	Greater London Authority (GLA)	Policy G5 of the Draft New London Plan encourages boroughs to develop their own Urban Greening Factor (UGF) which better reflects local circumstances. It is recommended that boroughs apply UGF to major applications only, but there is flexibility.	Whilst the council understands the draft London Plan policy content, it does not consider that Brent is so different from other areas of outer London to require a different standard. It is happy to rely on the standards set out in the London Plan. These are challenging and the determination of applications will give an understanding if a lower Brent target is required to allow the required UGF to be delivered.	No change
6.6 Green Infrastructure	6.6.6	Harini Boteju	Policy needs to go further and secure Urban Greening Factor (UGF) upfront through a quality planting and maintenance plan using a S106 agreement.	London Plan policy G5 requires the UGF to be integral to the design and layout of the development and be considered from the beginning of the design process. Supporting text sets out a long term management plan will be secured for all new open spaces.	No change
6.6 Green Infrastructure	6.6.7	Harini Boteju	No mention of spatial value of trees to Brent or the value of tree canopy cover to biodiversity. Policy BGI2 should have a value measure for trees which could be met by an iTree assessment. It would be useful for Brent to have an iTree report that could place a monetary value against loss of trees and canopy coverage which can then be charged to a development when a site is cleared. A	It is agreed that replacement of trees lost should replicate the canopy cover. The iTree approach can lead to extremely high valuations of trees which in terms of replacement provision are likely to be very considered unreasonable. As such the council will use the professional expertise of its arboricultural officer to determine what is a fair	No change.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			CAVAT assessment does not take into account loss of canopy cover.	replacement either in terms of planting on site, or provision elsewhere off-site.	
6.6 Green Infrastructure	6.6.9	Canal & River Trust	Working toward applying for a Green flag for the Brent Reservoir. Would welcome the council's input in developing a long term sustainable strategy and partnership working towards achieving this, similar to the work being carried out for the Welsh Harp.	Noted. This has been highlighted to the Parks Service.	No change
6.6 Green Infrastructure	6.6.10	Canal & River Trust	Should refer to the wellbeing benefits the canal can provide. The Trust's Waterways & Wellbeing study, present evidence on the link between access to waterways and the benefits for social, environmental and economic wellbeing. The 'canal natural' feature was found to be the strongest positive predictor of scenic quality and 'rivers' were ranked eighth in 'urban built-up', emphasising the important contribution that they can and do make to place-making.	Noted. The benefits all green infrastructure and the blue ribbon network for mental and physical well-being is acknowledged in paragraph 6.6.11.	No change
6.6 Green Infrastructure	BGI1	Greater London Authority (GLA)	In the absence of local policies to protect Sites of Importance for Nature Conservation, Brent should make it clear that development proposals follow the approach set out in Draft New London Plan Policy G6. Part g of Brent's draft policy should be amended to reflect the Draft New London Plan Policy G6 approach which states that development	London Plan policy G6 is specifically cross-referenced. The London Plan forms part of the development framework for Brent and does not need to be repeated in Local Plan policy. Paragraph g to be amended to reflect need for net biodiversity gains.	g) achieve a net gain in biodiversity and no detrimental impacts on the geodiversity of an area.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			proposals should aim to secure net biodiversity gains.		
6.6 Green Infrastructure	BGI1	London Borough of Harrow	Harrow supports this policy. Harrow encourages further dialogue to explore cross boundary opportunities to enhance green and blue infrastructure across both boroughs and as part of the wider London network.	Agreed. Duty to Cooperate meeting held to discuss further.	No change
6.6 Green Infrastructure	BGI1	David Pearson	It is vital that current parks and green spaces are retained and if necessary improved. The proposed increase in housing and other developments makes it all the more important that there is such provision as is recognised in item 6 of the preferred options where it says " Existing trees, plants and wildlife will be protected and more will be provided in new developments". Investment should be in open space as a whole not just trees and plants.	Policy BGI1 requires major development to contribute to improvements to the quality and accessibility of open space, where open spaces cannot be secured on-site. Improvements could include a range of measures and would be tailored to the specific site. CIL offers the potential for parks and open space infrastructure to be improved. This will need to be informed by the Council's parks team having a clear project plan of improvements to enable bidding for funds to be considered against other capital infrastructure projects.	No change
6.6 Green Infrastructure	BGI1	Natural England	Welcomes the green and blue infrastructure policy within the emerging local plan. Recommend that each individual place has its own green infrastructure strategy that will inform the masterplan design. This could be further informed by the All London Green Grid (ALGG) policy	The master planning approach for Staples Corner will consider the extent to which the Welsh Harp can be opened up for greater recreational use, however it is recognised that the requirement to protect the SSSI's ecology to support its designation will also	No change.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			framework. Take extra care when considering integration between new development that is directly adjacent to Brent Reservoir SSSI, considering all the impact pathways that could risk damage to the interest features. This could be avoided by integrating a green infrastructure strategy for 'East' place within the masterplan design stage. Would strongly recommend including a measure to ensure that development results in a net gain in biodiversity.	need to be addressed. The urban greening factor will ensure that new development provides a greater amount of green infrastructure than currently exists and this will assist in delivering bio-diversity improvements.	
6.6 Green Infrastructure	BGI1	Veenay Chheda	The open space available is sufficient if it is maintained. Objects to biodiversity measures.	London Plan policy requires net gains in biodiversity to be sought.	No change
6.6 Green Infrastructure	BGI1	St George	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 (in this regard) acceptable. It should also be made clear how the calculations are calculated as this is not shown in the draft Local Plan or in the LBB's adopted S106 Planning Obligations SPD.	Financial contributions will only be required to open space off-site where it is accepted publicly accessible open space cannot be provided on-site. The standards of provision will be included in the policy to provide greater clarity on what is required.	Amend BGI1 to provide greater clarity on standards of provision sought on site, or need for off-site contributions in-lieu.
6.6 Green Infrastructure	BGI1	Canal & River Trust	Supportive of consideration of the provision of 'meanwhile uses' which may provide an opportunity for community engagement and canal activation and are keen to explore this	Support noted. It is understood a balance needs to be struck between the various users of the canal including for living, recreation and biodiversity. The Canal and	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>with Brent. The waterway corridor may also provide opportunities to engage communities on adoptions and food growing. Supportive of points 6.6.29 and 6.6.30 on page 307, but need to consider suitability of public access along the offside of the canal. We are supportive of the protection and increase in biodiversity along the waterbodies, but opportunities for naturalisation of our waterways/waterbodies in the borough will be limited by requirements of their functional use.</p>	<p>River Trust will be engaged in schemes impacting on the canal.</p>	
6.6 Green Infrastructure	BGI1	Environment Agency	<p>Pleased to see this policy includes the enhancement and management of the Blue Ribbon Network, the set back of development and access improvement to watercourses. Have minor suggested improvements. 6.6.34 We are pleased to see a section on drainage issues affecting water quality however should also reference blockages, and overloading of the sewerage system. 6.6.35 recommend point g) refers to removing un-natural structures and an additional point added on retaining existing natural elements of Brent's watercourses.</p>	<p>Support noted. See proposed amendments.</p>	<p>6.6.34 . There are a number of reasons as to why these water bodies are not achieving good status. These includes physical modification as a result of urbanisation, effluents and emissions from industry, commerce, homes and roads. This can be due to a number of reasons for example, using drains to dispose of waste, failure of pollution traps, misconnections, blockages and overloading of the sewerage system. 6.6.35 a) "Deculverting, removing un-natural structures such as obsolete weirs and banks and bed reinforcements and</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
					retaining existing natural watercourse elements."
6.6 Green Infrastructure	6.6.16	Greater London Authority (GLA)	Reference to Policy G11 should be corrected to G1. The ambition of Brent to produce a Green Grid Framework is welcome, and could align with the Mayor's intention that boroughs should formulate green infrastructure strategies as set out in Draft Policy G1.	Support noted. Typo to be corrected.	6.6.16 G1
6.6 Green Infrastructure	6.6.24	Greater London Authority (GLA)	The Mayor welcomes Brent's approach in seeking opportunities for food growing in line with Draft New London Plan Policy G8.	Support noted.	No change
6.6 Green Infrastructure	BGI2	Greater London Authority (GLA)	While the protection of trees is important, the policy should also promote opportunities for new trees and woodlands in order to increase the extent of London's urban forest in line with Draft New London Plan Policy G7 and in achieving the Mayor's ambition to increase tree canopy cover in London by 10% by 2050. The requirement at paragraph 6.6.39 that development proposals that would result in the loss of existing trees should be informed by CAVAT, I-Tree Eco or similar valuation system in their replacement is welcome and in line with the Draft New London Plan.	The Borough Plan 's desired outcome is to seek to significantly increase the number of trees we plant on our streets, public spaces, and parks. The Local plan 6.6.7 states where possible, opportunities to increase the amount of streets trees are pursued. Policy BG12 states where tree retention in development sites is not possible, contribution will seek off-site tree planting. Adding text to clarify replacement canopy cover will be required would provide clarity.	Additional change to BGI2: b) "Where retention is agreed to not be possible, developers shall provide new trees to achieve equivalent canopy cover or".
6.6 Green Infrastructure	BGI2	Harini Boteju	BGI2 mentions financial contribution, but it is not clear how this is measured. Benefits of biodiversity set	Detail on how the financial contribution will be measured is to be included in the open space study. It is considered benefits of	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			out in supporting text, but should be placed in policy wording.	biodiversity are best outlined in policy justification, to keep policy wording concise and focussed on the information a decision maker needs to determine an application.	
6.6 Green Infrastructure	BGI2	Kensal Rise Residents' Association	Brent must have a policy that prevents a net reduction in trees, with a view to increasing the number of street trees year on year. Brent also needs to provision appropriate resources to remove and replace trees (stump grinding) where removal cannot be avoided.	The Council will be taking forward a Tree Strategy to cover all trees within the borough. The street trees budget has been reduced significantly which limits the extent to which additional planting and maintenance can be undertaken. Neighbourhood CIL and match-funding schemes promoting by communities provide the most realistic way of adding to the stock in the short to medium term.	No change
6.6 Green Infrastructure		Divia Patel	All green spaces should be preserved to make more liveable and pleasant places.	Noted. Open space is protected by policy in the NPPF and London Plan policy 7.18 and emerging London Plan policy G4. Policy BGI1 supplements existing policy by requiring major developments to incorporate publically accessible open space or contribute to enhancing quality of existing provision where this is not possible.	No change
6.6 Green Infrastructure		S Bartle	Brent has one of the lowest percentages of green spaces of any borough across London. The policy should go further and require all new large developments to contribute to an increase in the amount of green space available to residents.	Policy BGI1 requires all major development (those of 10 units of more) to incorporate publicly accessible open space or contribute to improving the quality of existing open space. This plus measures such as the Urban	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				Greening Factor place a high emphasis on creating green space within development.	
6.6 Green Infrastructure		Canal & River Trust	The Grand Union Canal runs through areas otherwise deficient in access to parks and open spaces and the links this area to wider provision of green space. It would be useful to acknowledge its benefits for health and wellbeing.	Agreed. See proposed additional text.	6.6.10 The Grand Union Canal runs through an area of open space deficiency in the borough and is an important route to linking to other open spaces.
6.6 Green Infrastructure		Mike McCall	Fryent Country Park is an underused resource. Could be promoted as a destination with better parking, signposting, café and toilet facilities.	Noted. Comments on suggested improvements to Fryent Country Park shared with Parks Team.	No change
6.6 Green Infrastructure		Mary Farrell	Green spaces are the lungs of an area and we need to protect and enhance them to counteract air pollution.	Noted.	No change
6.6 Green Infrastructure		Elizabeth Lindsay	Green spaces should include front and back yards. Concern increasing number of yards are being covered in concrete and mature trees are being removed. Building structures that could accommodate several rooms are being built in back yards but do not appear in plans submitted. In Australia, permission is needed from the council to cut down trees and these trees must be replaced within a certain period. Should consider community nursery that provides meaningful employment to intellectually disabled people and	Policy BT2 requires soft landscaping to be retained in front gardens. In many cases front and rear gardens can be paved without the need for planning permission, which limits the council's power to control this. The council proactively takes enforcement action against premises illegally built in gardens. Policy BGI2 provides detailed policy to protect trees as part of development. The Council uses Tree Preservation Orders to protect trees of value from removal.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			green space as an integral part of community hubs.		
6.6 Green Infrastructure		Kelly Eaton	Like the proposal to introduce more allotment sites into developments. The plan focusses too much on existing green spaces and does not consider green roofs, living walls or creative SUDS programmes as a way forward. Alternative to tree plants should be considered as a wider option for greening the borough. The links to other plans are good and need to be maintained and enhanced; particularly around water management, flood risk and working with organisations like Thames 21 to maintain and enhance local rivers and water bodies.	London Plan policy sets a greening factor for new development will be required to achieve, this could be through soft landscaping, green roofs, living walls or tree planting, depending on the site. This is cross-referenced in the policy but not repeated as the London Plan forms part of the development framework for the borough. Tree planting is just one of the forms of green infrastructure promote by the Plan. The inclusion of a policy specifically on trees is reflective of their importance in the Borough Plan and contribution to improving air quality. Policy on SuDS is contained within the Sustainable Infrastructure chapter.	No change
6.6 Green Infrastructure		Roger Macklen	Evefield Open Space could be a Community Garden. Gibbons Recreation Ground has been dramatically under used for over 20 years and there is scope for sports and recreational activity.	Detailed comments shared with Parks Service.	No change
6.6 Green Infrastructure		Mary Duffy	Strongly agree that parks and spaces are to be protected. Objects to council stopping cutting grass in Neasden Recreation Ground. Littering and homeless camps has appeared on Neasden Recreation Ground and has been reported in media.	Support for protection of open spaces noted. Comments on Neasden Recreation ground shared with the parks service.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.6 Green Infrastructure		Greater London Authority (GLA)	An up-to-date needs assessment of open space is required in accordance with London Plan policy G4. Policy G1 states boroughs should prepare Green Infrastructure Strategies.	An Open Space Study has been prepared and will be published alongside the Publication Stage version of the Local Plan. Other assessments of quality and quantity of a range of open space and sports provisions will also be published.	No change
6.6 Green Infrastructure		Ruth Dar	Strongly support policies. Keeping Brent, a green and leafy borough is highly desirable: trees fight pollution, improve air quality, the aesthetic environment. Some studies show that streets with trees are safer than those with none. Maintenance of existing parks and street trees is required as well as encouraging green guidelines for new development. Front gardens are an integral part of the greening of Brent and policy should require minimum permeable paving and large areas left unpaved.	Support noted. Policy BT2 requires soft landscaping to be retained in front gardens. In many cases front and rear gardens can be paved without the need for planning permission, which limits the council's power to control this.	No change
6.6 Green Infrastructure		Penny Bishop	King Edward Park is well used. Tokyngton Recreation Ground needs two access points for safety and exercise equipment should be closer to children's play area.	Noted. Tokyngton Recreation Ground (also known as Brent River Park) is identified as a priority open space for improvement in policy BP5. Detailed comments shared with Parks Team.	No change
6.6 Green Infrastructure		Jeremy Biggin	Make use of lost green space along Brent River.	Brent River Park is identified as a priority for improvement in the place chapters. Waterside development policy requires a setback along the river, naturalisation and walking routes.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.6 Green Infrastructure		Alison Hopkins	Parks and green spaces must be protected from development and no variation of Metropolitan Open Land status.	Noted. The Plan does not propose any changes to Metropolitan Open Land designations.	No change
6.6 Green Infrastructure		Renu Kaul	Parks and green spaces must be protected and preserved. They provide opportunities for recreation, dog walking, walking and cycling and improve air quality.	Noted.	No change
6.6 Green Infrastructure		Rachelle Lennard	Keep parks open and well maintained. For many it's the only opportunity to enjoy green space.	Noted.	No change
6.6 Green Infrastructure		David Walton	Developers pocket pocket parks.	The Local Plan includes policy to protect open spaces from development.	No change
6.6 Green Infrastructure		Sport England	Object. To ensure the plan is effective in planning for sport, sport facilities should be excluded from this standard approach and the Playing Pitch Strategy and the Indoor Sports and Leisure Needs Assessment should be used to direct future provision.	The recommendations from the Playing Pitch Strategy and Indoor Sports and Leisure Needs Strategy are reflected in the place policy chapters and Social Infrastructure chapter. The GI1 policy has taken a pragmatic approach to what existing provision is and the potential to increase that or provide for green infrastructure/ sports needs in the borough, balancing up the requirements against other priorities such as building the number of new homes required and achieving employment targets.	No change
6.6 Green Infrastructure		Annika McQueen	Support. Parks and green space add to residents' quality of life, provide opportunities for exercise and fresh air	Support noted.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			and enhance it for those who visit the area for work or leisure.		
6.6 Green Infrastructure		Shruti Soni	The extreme levels of house building in Wembley is dramatically reducing air quality. Green space should not only be protected but also expanded to reflect increasing resident numbers.	Policy BSUI2 requires all new major developments in growth areas and air quality focus areas to be air quality positive and elsewhere air quality neutral. Under Policy BG11 all major development where not in close proximity to existing provision will be required to incorporate publicly accessible open space.	No change
6.6 Green Infrastructure		Harini Boteju	The surrounding text seems to be all about parks and open space, but green infrastructure is also about planting including within public realm, as part of green roofs etc. Policy should recognise the difficulty in providing new 'public parks' because of the competing needs. Policy should require biophilic design. Existing parks in Brent are well used. Well maintained public realm can provide outdoor spaces that encourage people to walk through, reduces air pollution and has many more benefits. Whilst the term Biophilic design is not used, in the interests of keeping technical language to a minimum, it is considered London Plan and Local Plan policy on green infrastructure promote Biophilic design, in particular by requiring net gains in biodiversity. Referral to the Trees and Design	Paragraph 6.6.6 refers to the Urban Greening Factor, and makes specific reference to green roofs. Transport chapter includes policy to secure green infrastructure in the public realm, including requiring Healthy Streets standard.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Action Group (TDAG) website provides useful supporting information.		
6.6 Green Infrastructure		Sam Balch	There needs to be public realm / green space improvements around Harlesden station and along Acton Lane from Harlesden town centre through street tree planting down the road to minimise dust and green the area. The existing pocket park at the corner of Winchelsea road needs to be overhauled and landscaped to make the area more attractive, lower maintenance, and reduce the potential for vandalism. There needs to be a stronger approach to protecting front gardens.	The South Place policy identifies the area around Harlesden Station as a priority for public realm improvements. Comments on Winchelsea Road pocket park noted and shared with parks service. In many cases front gardens can be paved over without the need for planning permission providing drainage is incorporated. The council has a policy to retain front gardens and enforces against paving over front gardens where planning permission is needed.	No change
6.6 Green Infrastructure		OPDC	Suggest removing analysis of open space deficiency within OPDC Area for clarity.	Map to be amended.	Figure 33 to be amended.
6.6 Green Infrastructure		Luca Taschini	Trees should be planted in Willesden Green. Semi-buried recycling and waste points should be made available in busy areas across Brent.	The council has undertaken tree planting schemes in Willesden Green and continues to explore the feasibility of additional tree planting. Semi-buried recycling and waste bins have been used in Wembley and the council will consider in future public realm schemes. This will be determined through the detailed design of each scheme.	No change
6.6 Green Infrastructure		Kishan Vekaria	Appropriately sized trees should be implemented in Willesden Green residential area. Should be planting	The council has undertaken tree planting schemes in Willesden Green and continues to explore the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>either side of North Circular to filter air pollution. Semi buried recycling/waste points should be made available in core areas in Brent. Front and rear gardens should be protected in addition to permeable pavements to avoid hard pavements over front gardens and the loss of historical character and green areas. A farm/birds conservation centre should be provided within the area of Gladstone Park. Policy should promote environmentally friendly buildings.</p>	<p>feasibility of additional tree planting. Policy to include environmental quality along the North Circular is included in the transport chapter. Semi-buried recycling and waste bins have been used in Wembley and the council will consider in future public realm schemes. This will be determined through the detailed design of each scheme. Policy BT2 requires soft landscaping to be retained in front gardens. In many cases front and rear gardens can be paved without the need for planning permission, which limits the council's power to control this. Comments on conservation area will be shared with the Parks Service. Policy to secure sustainable buildings is set out in a different chapter.</p>	
6.6 Green Infrastructure		Francesca Severn	<p>More green spaces are needed due to the built up nature of the borough. Pubs and large garden areas have been lost. Welsh Harp has been degraded by development on the Barnet side.</p>	<p>Noted. Policy BG11 requires major developments to incorporate publically accessible open space or contribute to enhancing quality of existing provision where this is not possible. The Local Plan includes a pub protection policy. The Welsh Harp is protected due to its status as Metropolitan Open Land and its biodiversity designations, including being a Site of Special Scientific Interest.</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.6 Green Infrastructure		Elayne Coakes	Need to include as much green space as possible in development and find a way to maintain it.	Noted. Policy BGI1 requires major developments to incorporate publically accessible open space or contribute to enhancing quality of existing provision where this is not possible. Open space is to be supported by a sustainable long-term management plan.	No change
6.6 Green Infrastructure		Manjul Shah, Mitesh Mashru	Support the proposals.	Noted.	No change

SUSTAINABLE INFRASTRUCTURE

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	6.7.9	Andrew Clayfield	The combined heat and power network in South Kilburn is unreliable, expensive and frequently breaks. The environmental impact of frequent repairs means this technology is not more sustainable than traditional.	Noted. This refers to a block heating system, rather than combined heat and power. Older systems have less flexibility than modern in terms of comfort for individual properties and heat regulation and also may have suffered from under-investment. Newer systems will be more efficient.	No change
6.7 Sustainable Infrastructure	BSUI1	Quintain	How will the new CHP networks be delivered? Will this be the responsibility of major landowners or will the council take the lead as in South Kilburn? The policy should acknowledge that providing a CHP network may not be feasible or viable, and should recognise the shift in energy policy where the GLA are promoting other forms of communal heating.	The Council is currently seeking to appoint additional resource to its sustainable energy team to allow it to take a greater lead on taking forward the district networks. This work will be done in association with the major developers/ landowners of areas. It is still a GLA policy requirement to provide/ connect to a district system.	No change
6.7 Sustainable Infrastructure	BSUI1	Department for Education	To maximise value for money and efficient use of public funds, we question if a requirement for schools to receive BREAM 'Excellent' rather than 'Very Good' is justified.	This is considered to be a short-term outlook rather than concerning the whole life-cycle of the property including on-going running costs. The Council does not feel it is appropriate to reduce the standard as it considers that particularly if it is considered at the outset of the project it can be achieved without	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				adding substantial cost. If costs of its achievement are shown to be prohibitive then the Council may agree a lower standard if specific priority measures can be achieved taking account of the site's characteristics.	
6.7 Sustainable Infrastructure	BSUI2	Harini Boteju	The supporting text should cross-refer to green infrastructure too because of policy BSUI2 for Air Quality. Design and construction can include biophilic elements.	Agree that supporting text could cross-refer to Green Infrastructure policies and its role in assisting environmental resilience.	Amend paragraph 6.7.10 to start with: "6.7.10 There is a significant role for Green Infrastructure to be multi-functional. It can improve physical and mental health, increase biodiversity, provide recreation, assisting in supporting environmental resilience and addressing the impacts of climate change."
6.7 Sustainable Infrastructure	BSUI2	Canal & River Trust	There are several ways in which our waterways can reduce pollution including; walking and cycling on canal towpaths, transportation of freight using the canal network, and using the canal to heat and cool buildings. While the first of these two points are recognised in the Plan, the third is not.	Agree. Text added to supporting text and appropriate site allocations encouraging developers to explore this possibility.	Text added to 6.7.21 ". Innovative solutions are encouraged. Existing features such as the Grand Union Canal for example, provide the opportunity for heating and cooling of buildings." Text added to appropriate site allocations encouraging developers to explore the possibility of using canal water for heating and cooling buildings.
6.7 Sustainable Infrastructure	BSUI2	Kensal Rise Residents' Association	More must be done to ensure future, and current developments deliver a measurable and tangible benefit to	Policy BSUI2 requires major developments within Growth Areas and Air Quality Focus Areas to be	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			air quality. Prioritising public transport and active travel over private motor cars should be actively considered and pursued	Air Quality Positive. Elsewhere, these must be Air Quality Neutral. Where on site delivery of these standards cannot be met, off-site mitigation measures will be required. Policy BT1 prioritises public transport and active travel over private car use.	
6.7 Sustainable Infrastructure	BSUI2	Greater London Authority (GLA)	Support Brent's approach in promoting air quality positive development. Major development must, as a minimum, be air quality neutral and in accordance with Draft New London Plan Policy S11.	Noted.	No change
6.7 Sustainable Infrastructure	BSUI3	Canal & River Trust	The canal can sometimes accept clean surface water drainage from adjacent developments. This should be included as a potential option for developments to explore. Support the requirement for development to be resilient to flooding.	Noted. This can be addressed as part of the drainage strategy for major developments and its appropriateness is something the Trust can address at that time.	No change
6.7 Sustainable Infrastructure	BSUI3	Environment Agency	The final paragraph of Policy BSUI3 should state that such proposals will be refused rather than resisted. Object in principle to any development which involves the loss of, or impedes the function of, FZ3b (functional floodplain). Additionally in line with Table 3: Flood risk vulnerability and flood zone 'compatibility' of the Planning Practice Guidance we would object to any development, except that classed as 'water compatible',	The Council is committed in the early part of the policy to ensure that on-site flood risk is minimised and the risk of flooding is not increased elsewhere. There are developed sites adjacent to functional floodplain within Brent that would without the presence of buildings/ structure be regarded as functional floodplain. In redeveloping these sites, a better outcome in relation to addressing floodrisk/ bio-diversity might be	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			proposed in FZ3b on incompatibility grounds	achieved through flexibility and swaps of land with functional floodplain. In these cases, the change to 'refused' could reduce flexibility in doing this, even if better outcomes could be achieved. As such the current policy wording is considered sufficiently strong. National policy is clear about what types of development are appropriate in functional floodplain.	
6.7 Sustainable Infrastructure	BSUI3 & 4	London Borough of Harrow	Harrow support these two policies, and look to continue dialogue through the West London Strategic Flood Risk Assessment.	Noted.	No change
6.7 Sustainable Infrastructure	BSUI4	Environment Agency	Support the policy and agree that proposals which do not adequately control surface water should be refused.	Noted.	No change
6.7 Sustainable Infrastructure	BSUI4	Quintain	The requirement for minor development and changes of use proposals to be accompanied by a drainage strategy should only occur where there is significant detrimental impact on the current drainage regime. Where drainage strategies for minor development and changes of use are required, these should be assessed by LBB as Thames Water and the EA are not suitably resourced to receive large numbers of drainage strategies.	These strategies are principally associated with the impact of surface water flooding. Brent in its role as Lead Local Authority will assess the appropriateness of the majority of these applications.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure		Canal & River Trust	The Local Plan should highlight the possibility of using canal water for heating and cooling buildings.	To date this opportunity has not yet been taken up by developments adjacent to the canal, but is an option worth considering. It potential can be added to the Sustainable Infrastructure chapter.	Add sentence to paragraph 6.7.21. "Innovative solutions are encouraged. Existing features such as the Grand Union Canal for example, provide the opportunity for heating and cooling of buildings."
6.7 Sustainable Infrastructure		Thames Water	Para 6.7.19 confuses water efficiency and wastewater treatment capacity issues. Text should clarify that developers should discuss proposals with Thames Water before submitting an application as it is currently ambiguous. Wording of BSUI4 should be amended to make policy consistent with the approach to the delivery of water and wastewater network infrastructure. Some policy wording and supporting text requiring the inclusion of water efficiency conditions on new development would be beneficial. It would be beneficial if the wording provided could be included within or after para 6.7.43.	There is no confusion between water efficiency and waste-water capacity issues. The greater the efficiency of water use, the less water that will require treatment. See amended supporting text	Text amended 6.7.18 "Developers of major schemes should seek a coordinated water management approach with Affinity and Thames Water to ensure sufficient water supply and wastewater infrastructure capacity at an early stage to establish a sustainable approach, efficiency and effective mitigation of impacts"
6.7 Sustainable Infrastructure		Kelly Eaton	Section is very short and lacks proper consideration. Soft landscaping alone will not provide for sufficient run off in heavy rain.	It is recognised that soft landscaping alone will not provide for sufficient run-off in heavy rain. The requirement to meet the greenfield run off rate will need to be tailored to the individual site and set out in its drainage strategy. In	Text added: "London Plan policies and other documents: Policy SI5 Water Infrastructure, Policy SI13 Sustainable drainage The SuDS Manual 2015

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				most cases due to the urban setting and high density, under surface storage is likely to be required. Text added where reference to London Plan policies and other documents have been made i.e. Reference to London Plan policies and other documents: The SuDS Manual 2015 CIRIA, Designing Rain Gardens: A Practical Guide. 2018 Urban Design for London, SuDS in London: A Guide. Transport for London	CIRIA, Designing Rain Gardens: A Practical Guide. 2018 Urban Design for London, SuDS in London: A Guide. Transport for London"
6.7 Sustainable Infrastructure		Grace Brown	Disagree that proposed development of over 24,000 homes will be supported by 'sustainable infrastructure'. This will disadvantage both existing and new residents. There is a sense that money is being made by those in power related to the new development.	Noted. The Council will seek to ensure that appropriate provision of infrastructure occurs, however development will only generate sufficient resources to pay for part of the requirements. Much will be dependent on national public expenditure programmes.	No change
6.7 Sustainable Infrastructure		Amanda Hervey, Jon Harahap	Planning policy should reward environmentally friendly buildings with incentives for green buildings using solar panels, green roofs etc. More electric car charging points should be made available.	The council is currently working to provide more electric car charging points and this is reflected in policy BT1 (m). Not meeting carbon neutral and air quality standards for major developments results in paying contributions to off-set the potential adverse impacts.	No change
6.7 Sustainable Infrastructure		Manjul Shah, Mitesh Mashru	We support the proposals.	Noted.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure		Veenay Chheda	Residents should be charged for lack of recycling	Currently the Council prefers to encourage through education, rather than financially penalise to assist with greater recycling rates.	No change

TRANSPORT

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.8 Transport	6.8.3	Canal & River Trust	Outline of existing cycle and walking routes should include Grand Union Canal Quietway.	Agreed. Reference added.	6.8.3 The Grand Union Canal is a pedestrian and cycle route connecting Alperton to Greenford to the west and Park Royal and Old Oak to the east.
6.8 Transport	6.8.4	OPDC	Definition of sustainable travel could be clarified.	Agreed. Amended to clarify public transport, walking and cycling are sustainable travel.	6.8.4 Brent Long Term Transport Strategy 2015-35, identifies how we will promote sustainable and active travel (public transport, walking and cycling) over the use of private vehicles. 6.8.5 Sustainable and active travel is not only necessary for the road network to cope with demand, but there are clear health benefits in promoting active travel and reducing air pollution from vehicles.
6.8 Transport	6.8.4	Canal & River Trust	Keen to work with Brent to remove barriers to walking and cycling.	Support welcomed and Brent Council will work with Canal and Rivers Trust in taking this forward.	No change
6.8 Transport	6.8.5	Canal & River Trust	Support the proposal to extend Quietways. Should also include reference to the Grand Union Canal Quietway.	Agreed. See proposed amendment. Term Quietways amended to cycleways to reflect change in TfL terminology.	Future cycle routes include Wembley Park to Harrow Weald cycleway; and the Grand Union Canal cycleway which is being extended from Alperton to the west towards

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
					Hayes, and subject to funding to the east towards Park Royal and Old Oak.
6.8 Transport	6.8.6	OPDC	The WLO will also link Brent with places beyond Old Oak to the south.	Noted. See proposed amendment. Map also to be included for clarity.	Change 6.8.6. to: The link would make use of the existing Dudden Hill freight line to create an overground passenger line connecting Hounslow in the west to Hendon and West Hampstead in the east via Old Oak Common (Cross rail and High Speed 2 stations), Harlesden, Church End, Neasden and Brent Cross (Thameslink station).
6.8 Transport	6.8.7	Canal & River Trust	Support the aim of making Active Travel the preferred choice.	Noted.	No change
6.8 Transport	BT1	David Pearson	The emphasis should be on positive encouragement to use other means of transport rather than targeting cars as anti-social.	Noted. The policy seeks to set out measures to encourage people to shift to active and sustainable travel.	No change
6.8 Transport	BT1	Annika McQueen	Would like to see an improvement to air quality in Neasden.	Noted. By promoting a reduction in car use and planting the Plan seeks to improve air quality. Growth Area will be Air Quality Positive.	No change
6.8 Transport	BT1	Neil Zussman	Support bus lanes, but there's no room for them on Ealing Road where it's needed most. Buses should terminate at Hanger Lane rather than Alperton. Improve linkages between Piccadilly Line at Park Royal and Central Line at Hanger	Linkages to Park Royal Station are being improved with a pedestrian and cycle bridge. A bus link connects Hanger Lane and Park Royal and cycle routes are also being improved between the stations. The council will continue	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Lane, as Central Line is a quicker route into Central London. Need better train links between Alperton and Sudbury on to Uxbridge. Would like to see Alperton and Wembley Park stations moved into Zone 3 (or possibly the Zone 3-4 border). Make it cheaper to travel by bus and ensure sufficient capacity.	to engage with TfL to improve services. In London public transport fares are set by the Mayor of London.	
6.8 Transport	BT1	Mary Duffy	Support increased cycling bikes. Support Lime Bikes, although the Santander Bikes would have been just as good. Neasden is currently cut in half by the North Circular, so the only way to get to Dollis Hill is either over the bridge from Neasden Recreation or walking under the pedestrian underpass at Neasden Town Centre which is always littered. Use Quietways but many roads in borough difficult to incorporate cycle routes.	Support for cycling noted. The approach in the Brent Cycling Strategy is to extend cycleways and focus cycling on low trafficked routes.	No change
6.8 Transport	BT1	Renu Kaul	Support as improves public health and air quality and reduces obesity.	Support noted.	No change
6.8 Transport	BT1	Andy Brommage	A good objective. Will take some time to change behaviour so need individual tailored solutions. Due to an accident whilst cycling less able to walk and cycle so more reliant on public transport.	Noted. The policy seeks to set out measures to encourage people to shift to active and sustainable travel. Car parking standards based on PTAL allows for local variations.	No change
6.8 Transport	BT1	Shruti Soni	Roads are congested. Need to ensure homes are located within walking distance of facilities and	Site allocations have been informed by an assessment of PTAL and access to essential services including retail, schools, healthcare	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			allow for Ubers and servicing not just cars.	and open space. Policy BT3 requires developments to be supported by servicing plans.	
6.8 Transport	BT1	TfL Commercial Development	Strongly support policy BT1, Sustainable Travel Choice, including reference to prioritising active and sustainable travel over private motor vehicles.	Support noted.	No change
6.8 Transport	BT1	Mary Farrell	Support. Walking, cycling and using public transport are more environmentally friendly and has health benefits.	Support noted.	No change
6.8 Transport	BT1	London Borough of Barnet	Support Brent's references to the WLO in Policy BT1, but would request the policy references the need to work with adjoining Boroughs such as Barnet.	Agreed. See proposed amendment.	6.8.13 The council will work closely with TfL and boroughs forming the West London Alliance to facilitate the delivery of the WLO.
6.8 Transport	BT1	Quintain	Support the West London Orbital rail link project and consider its delivery will significantly enhance the boroughs connectivity	Support noted.	No change
6.8 Transport	BT1	Canal & River Trust	Support policy. Improved access, wayfinding and improvements to the towpath can have a big impact on people's propensity to use it as part of their daily routine.	Support noted.	No change
6.8 Transport	BT1	London Borough of Barnet	Pleased to note Policy BT1 support for enhancing the A5 corridor to reduce traffic dominance and improve the public realm, due to this road corridor being shared between our Boroughs should reference need for joint working.	Agreed. See proposed amendment.	6.8.14 Brent Council will work with the London Borough of Barnet to deliver improvements along the A5, including improved public realm and increased tree planting.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.8 Transport	BT1	Alison Hopkins	Need to make walking and cycling safe and improve north south connections. Safety a particular issue on A5 and A406. Brent Thameslink Station should be step free.	The Local Plan is informed by the Brent Cycling Strategy which sets out how new routes and enhancements to existing routes will create an interconnected route network across the borough. The Thameslink Station will be step free.	No change
6.8 Transport	6.8.13	Quintain	Unclear how a new station at Neasden would be funded. It will be important to ensure the capacity of site allocations is correctly identified so infrastructure capacity can be planned.	The West London Alliance are working with TfL on identifying the funding strategy for the WLO including any new stations and infrastructure required.	No change
6.8 Transport	BT2	Jeremy Biggin	Car free is becoming more accepted by households where public transport infrastructure is in place. More car clubs.	Noted.	No change
6.8 Transport	BT2	Andrew Clayfield	Live in a car free development in an area with PTAL 4 and supports a larger roll out. However, need to consider access for trade vehicles to allow for minor household repairs. Car Clubs and City Bikes are valuable for mobility across London without clogging up tubes and buses.	Support for car free and cycle hire scheme noted. Policy BT3 requires developments to be supported by servicing plans, to ensure suitable servicing including access for contractors. Brent has recently introduced a borough wide cycle hire scheme.	No change
6.8 Transport	BT2	Apartments for London, Wembley Towers Limited (owners of Wembley Point and surrounding	Plan should allow for car free developments even in the absence of CPZ based on a Travel Plan and appropriate justification through a Transport Assessment to demonstrate limited impact on	Car free development where there is no CPZ in place results in pressure on the surrounding street network, many of which are already heavily parked. This can result in congestion and safety issues.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
		land)& Stonebridge Real Estate Development Ltd (Unisys site owner)	adjacent streets. The Plan should allow for a reduction in accessible car parking, below the 10% disabled parking spaces required as this is often underutilised.	Therefore, car free development is subject to a CPZ being in place or achievable. The London Plan sets disabled person's car parking standards and the Local Plan must be in general conformity with it. Site specific discussions might exceptionally justify a departure from standards, but this will not be the norm.	
6.8 Transport	BT2	Alison Hopkins	Dollis Hill has low PTAL levels and many trades people use vans and require car parking. There is uncertainty over Brent Cross West.	Car parking standards are subject to Public Transport Accessibility Levels and allow for a higher level of car parking in areas with a low PTAL such as Dollis Hill. The West London Orbital and Brent Cross Thameslink are opportunities to improve PTAL in Dollis Hill. Whilst the developer Hammerson has put on hold the extension to Brent Cross Shopping Centre, this does not preclude the Brent Cross Thameslink Station coming forward. The Thameslink station is being taken forward by Network Rail and Barnet Council with anticipate delivery 2022.	No change
6.8 Transport	BT2	Mary Duffy	Support promotion of public transport, walking and cycling. In new developments at Wembley difficult for residents to receive services from small businesses without parking in front of property.	Policy BT3 requires developments such as those in Wembley to be supported by servicing plans, to ensure suitable servicing including access for contractors.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.8 Transport	BT2	Wendy Martin	It is not reasonable for residents to relinquish their car use.	Car parking standards apply to new developments and not existing residents. Car free development will be subject to high Public Transport Accessibility Levels.	No change
6.8 Transport	BT2	Kensal Rise Residents' Association	More needs to be done to ensure cars do not dominate our neighbourhoods. The number of permits per household needs to be reviewed with significant attention paid to the difference of inner / outer London requirements and street scenes. There is an opportunity to make to make the bus network more reliable and serve more customers by reviewing routing and dependence on individual corridors.	Agree that the character of Brent has both an inner and outlet London character with differing requirements. Car parking standards based on PTAL allows for local variations. New car free developments will be subject to a Controlled Parking Zone being in place and new residents will not be entitled to permits for on street parking. The council will continue to work with bus operators to seek to improve the reliability and frequency of services.	No change
6.8 Transport	BT2	Quintain	Note car parking is to be provided consistent with draft London Plan standards. Electric Vehicle Charging Point provision and cycle parking standards are significantly higher in the draft London Plan whilst the overall parking requirement is lower. LBB need to recognise the cumulative impact of such design polices on the viability of a scheme.	Noted. The impact of the London Plan Electric Vehicle and cycle parking standards were tested in the London Plan Viability Study. The draft Brent Local Plan must be in conformity with the London Plan and has also been subject to viability testing.	No change
6.8 Transport	BT2	St George	Current London Plan cycling standards result in cycle parking which is underused. Suggest 1 space per dwelling is more appropriate and usage monitored.	The Local Plan must be in general conformity with the London Plan. Given Brent's population pressures there is a need for a modal shift to active travel if the road network is	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				to cope with additional capacity provision of cycle parking will be an important aspect of changing behaviour.	
6.8 Transport	BT2	Ashleigh Bell	Car parking should be underground and there should be ample parking for families and visitors.	Car parking standards are subject to Public Transport Accessibility Levels and allow for a higher level of car parking for family homes. Although in many high density developments underground parking can be the best solution, on minor developments it is not always feasible due to the cost of excavation. Format of parking is therefore assessed on a case by case basis taking into account matters such as operational requirements, viability and setting. Car parking standards are set in the London Plan. The standards don't distinguish between visitor and resident parking.	No change
6.8 Transport	BT2	Annika McQueen	Some disabled and elderly residents will need car parking.	On 'car free development' London Plan policy still requires car parking for disabled people. Supported housing for older people is subject to separate car parking standards.	No change
6.8 Transport	BT2	TfL Commercial Development	Support Brent's desire to align with London Plan policy regarding residential parking provision and clear criteria for managing the impact of parking. Reference to Appendix 3 within Policy BT2 should be amended to read "Appendix 4",	Support welcomed. Reference to incorrect Appendix will be corrected.	BT2 Appendix to be changed to Appendix 4.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			as this policy directly relates to the referenced parking standards.		
6.8 Transport	BT2	Pocket Living	Support maximum car parking standards and promotion of car free development. These will help to promote both sustainable modes of transport and the effective use of land.	Support welcomed.	No change
6.8 Transport	BT2	Shruti Soni	There is very limited radial connectivity in London. The increasing traffic is not just due to cars, but due to Ubers and delivery vans. Family sized accommodation should be allowed car parking spaces.	The Local Plan seeks to improve radial connectivity through the West London Orbital which would improve connections between Brent to Old Oak and wider West London. It also promotes sustainable modes of freight/delivery including canal and railway. Car parking standards allow a higher level of car parking for family housing, taking into account Public Transport Accessibility Levels.	No change
6.8 Transport	BT2	Renu Kaul	To reduce car use public transport needs to be cheaper and easily accessible. Families will always want to the use their cars for cost and convenience. All new homes should have car parking provision underground. Chiltern Railways need to increase their daily and week end service from Sudbury and Harrow Road to and from Marylebone.	The council will continue to work with transport operators, including Chiltern Railway to seek to improve the frequency of services. Cost of transport across the London public transport network is set by the Mayor of London. Car parking standards allow for a higher level of car parking for family homes, subject to Public Transport Accessibility Levels. Although in many high density developments underground parking can be the best solution, on minor	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				developments it is not always feasible due to the cost of excavation. Format of parking is therefore assessed on a case by case basis taking into account matters such as operational requirements, viability and setting.	
6.8 Transport	BT2	OPDC	To support clarity of the policy, 'residents parking' could be reworded to 'on street residents' parking.'	This aspect of the policy could apply to both on street and off street residents parking, so no change proposed.	No change
6.8 Transport	BT2	Andy Brommage	Each development will need to be looked at individually. Support not putting car parking on the site of new homes and allowing it on street. Agree to car free on one bed flats, but will be a disadvantage for families. I would agree not to put any car parking on the site of the new home & allow it on the street. Why does the policy not encouraging electric cars or different ownership/rental methods?	Each development is assessed individually and will be subject to its own Transport Assessment and Travel Plan. Car parking standards are subject to Public Transport Accessibility Levels and allow for a higher level of car parking for family homes. Policy BT2 promotes car clubs, whilst the London Plan contains standards for Electric Vehicle charging points.	No change
6.8 Transport	BT2	David Pearson	Whilst supporting the use of public transport it is not realistic to permit buildings without any parking provision. Wants to see improved design quality.	London Plan car parking standards will apply which link the level of parking to Public Transport Accessibility Levels (PTAL). Car free would only be acceptable where there is a high PTAL.	No change
6.8 Transport	6.8.24	OPDC	Could include policy on transformation of car parking to cycle parking.	The draft Local Plan includes policy to provide for and make contributions to cycle parking, in line with or exceeding TfL and WestTrans standards. Whilst an	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				increase in cycle parking would be seen positively, any application to convert car parking to cycle parking would need to be assessed on a site by site basis, taking into account operational requirements.	
6.8 Transport	BT3	Canal & River Trust	Welcome waterborne freight being included in this policy to highlight the opportunity to developers.	Support noted.	No change
6.8 Transport		S Bartle	Council should improve walking and cycling routes. Cycle routes should be segregated from private vehicles, unlike the routes introduced in Kensal Green. Should push for London Cycle Hire scheme to come to Brent as Lime Bikes create clutter on pavements.	Within the funds available the council is delivering on its Walking and Cycling Strategy to create a comprehensive route network connecting key locations. Cycle routes are to be designed to be safe and high quality. Segregated routes are encouraged but dependant on the width of carriageway, therefore it is not felt appropriate to prescribe this level of detail in the Local Plan. The Lime Bikes have been introduced as an alternative to the London Cycle Hire Scheme, as the Mayor has stated they will not extend the Santander scheme.	No change
6.8 Transport		Roger Macklen	Brentfield area experiences congestion during Diwali festival.	Noted. Improved connectivity through wayfinding from Harlesden and Neasden Station and the WLO could help alleviate some congestion.	No change
6.8 Transport		Neera Hirani	Need for uninterrupted and safe cycle lanes. On street parking causing congestion and difficulty for	Noted the Brent Cycling Strategy sets out the council's strategy to extend the borough's cycle routes	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			buses and cyclists. New car-free development should be subject to public transport enhancements.	to create a comprehensive network connecting key locations such as town centres and growth areas. The Local Plan includes policy to support the implementation of the strategy. Car-free development is subject to a high PTAL and CPZ. The council will secure financial contributions from developments to enhance public transport where this is required to make development acceptable. Any changes to existing on street parking would be as a result of parking improvement scheme, rather than new development.	
6.8 Transport		Al Jugoo	Increase electric car charging capacity in all car parks in the borough.	The need to increase coverage of Electric Vehicle charging points across the borough is set out in policy BT1. M. Under London Plan policy T6. G car parking in new developments is required to include provision for electric or other Ultra-Low Emission vehicles. The Council is delivering a charging networks on public highway which has the advantage of being accessible to the public all times.	No change
6.8 Transport		Luca Taschini	The Metropolitan Line should stop at Willesden Green. Need for uninterrupted and safe cycle lanes.	The line is managed by TfL who determine the stopping service on a commercial basis. Willesden Green is 3 stops from Wembley and Finchley Road station, which are interchange stations on which	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				<p>you can transfer from the Metropolitan Line to Jubilee. Noted the Brent Cycling Strategy sets out the council's strategy to extend the borough's cycle routes to create a comprehensive network connecting key locations such as town centres and growth areas. The Local Plan includes policy to support the implementation of the strategy.</p>	
6.8 Transport		Kishan Vekaria	<p>The Metropolitan Line should stop at Willesden Green and the station should be step free. Need for uninterrupted and safe cycle lanes. On street parking causing congestion and difficulty for buses and cyclists. New car-free development should be subject to public transport enhancements. Electric vehicle charging points and Wi-Fi should be promoted across the borough.</p>	<p>The line is managed by TfL who determine the stopping service on a commercial basis. Willesden Green is 3 stops from Wembley and Finchley Road station, which are interchange stations on which you can transfer from the Metropolitan Line to Jubilee. The council will continue to engage with TfL on increasing stations in the borough with step free access. Noted the Brent Cycling Strategy sets out the council's strategy to extend the borough's cycle routes to create a comprehensive network connecting key locations such as town centres and growth areas. The Local Plan includes policy to support the implementation of the strategy. Any changes to existing on street parking would be as a result of a parking improvement scheme, rather than new development. Car-free development is subject to a high</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				PTAL and CPZ. The council will secure contributions to enhance public transport where this is required to make development acceptable. Policy promotes Electric vehicle charging points and 5G Wi-Fi across the borough.	
6.8 Transport		Amanda Hervey, Jon Harahap	The Metropolitan Line should stop at Willesden Green and the station should be step free.	The line is managed by TfL who determine the stopping service on a commercial basis. Willesden Green is 3 stops from Wembley and Finchley Road station, which are interchange stations on which you can transfer from the Metropolitan Line to Jubilee. The council will continue to engage with TfL on increasing stations in the borough with step free stations with step free access.	No change
6.8 Transport		Nicholas Sharp	Concerns regarding condition of pavements and that vehicles are parking in cycle lanes.	Policy requires cycle routes to be designed to be safe, high quality and convenient, including the implementation of new cycleways. Note comment on condition of pavements. Areas of damaged paving can be reported through the Cleaner Brent App.	No change
6.8 Transport			Concern congestion on trains and buses.	The council will continue to work with TfL to improve capacity on the existing public transport network. The WLO will help to alleviate pressure on orbital bus routes and the road network. The council will secure financial contributions from	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				developments to enhance public transport where this is required to make development acceptable.	
6.8 Transport		Luca Taschini	Electric charging points should be made available across the whole borough.	Agreed. The need to increase coverage of Electric Vehicle charging points across the borough is set out in policy BT1 part m.	No change
6.8 Transport		David Walton	Enhance cycle links from Kensal Rise and Kilburn to Church End via Willesden Green, and from Harlesden to Cricklewood.	Noted. The South East place chapter includes further information on proposals to improve cycle links between these locations.	Include map of proposed routes
6.8 Transport		John Cox	The borough should openly attempt to protect all operational railway land in the borough by default to ensure it is not sold. This is needed to ensure the ability to expand the railway system to meet future needs is not prejudiced. Examples provided of where the sale of land has prejudiced transport projects coming forward.	The Plan includes policy to safeguard railway land including the WLO and protect sidings for freight.	No change
6.8 Transport		David Walton	Car free development in South Kilburn to reduce road vehicle dominance.	Car free development will be secured subject to suitable PTALs. Cycle routes are also being improved to reduce traffic dominance. Decanted residents have been offered parking permits, on the grounds that they already have an existing parking.	No change
6.8 Transport			Opposed to WLO as it will spoil the tranquillity of Gladstone Park and do not believe there will be sufficient demand.	West London currently lack orbital transport routes. Modelling by TfL indicates sufficient demand for the route to be feasible. The WLO will	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				make use of an existing freight line that runs through a section of Gladstone Park. There would be an increase in services operating along the route, and management of impacts would need to be considered through detailed design. As it is operational, the line could be used more intensively through Network Rail/ operator use plans without the need for any permissions.	
6.8 Transport		Elizabeth Gaynor Lloyd	Concern proposals for Northwick Park will impact on road network.	A masterplan for Northwick Park will be informed by a transport assessment and improvements to public transport, the road network and walking and cycling routes secured as identified. Northwick Park benefits from close proximity to Northwick Park Station, but there is an opportunity to improve pedestrian connections to the station.	No change
6.8 Transport		Jo King	Support for WLO. Feel car drivers are penalised by parking fees.	Support for WLO noted. Control of parking fees is outside of the scope of the Local Plan.	No change
6.8 Transport		Roger Macklen	Would like existing freight lines to be used for passengers and connect to Old Oak. A station at Taylors Lane would benefit local community and could serve the temple.	Support for use of Dudding Hill freight line for passengers noted. Location of stations would be subject to detailed feasibility work. At this time only two stations are proposed in Brent. Once the line is open further opportunities might be considered.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.8 Transport		Vikram Soni	Whilst parts of Wembley have good PTAL, orbital links are poor. Increased population could lead to gridlock. Questions the accuracy of modelling in Wembley transport studies .	The modelling has been calibrated and validated by TfL. It is based on recent traffic surveys of the area and takes into account forecast background growth. The council is taking forward improvements to the transport network in this area including junction improvements along the Western Corridor (Forty Lane through to the triangle) to improve flow and enhance capacity. Pedestrian facilities are being improved as a result of the new development.	No change
6.8 Transport		Rajiv Bajaria	Lack of detail of how transport infrastructure is to be improved.	The Local Plan sets policy to help deliver the Brent Long-term Transport Strategy, Cycling and Walking Strategy and Local Implementation Plan (LIP). These documents are cross-referenced and the LIP sets out in greater detail the transport infrastructure to be brought forward. The LIP provides more certainty in the short to medium term of what can be delivered as it usually takes account of committed funding.	No change
6.8 Transport		Alice Whitehead	Removing car parking from supermarkets will encourage people to drive further to a supermarket with a car park.	Supermarkets will need to retain some car parking to meet operational requirements, but there is an opportunity for car parking land to be used more efficiently. Morrison's and Oriental City in Burnt Oak/Colindale is an example	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				of where this has been achieved with multi-storey car parking with development above. Supermarkets also offer delivery which can be a more time and cost efficient option for residents as well as reducing single occupier car trips.	
6.8 Transport		Greater London Authority	Parking standards for employment (B1) uses in Opportunity Areas would allow a higher level of parking than permitted in policy T6.2 of the London Plan.	Noted. Amended to state London Plan standards apply for B1a uses.	<p>Parking for Employment Uses</p> <p>8.4.1 Parking standards for B1a uses as set out in the London Plan policy T6.2 apply in Brent. For other employment uses in the B use class or closely related sui generis uses, the following standards, as detailed in Table 1, should be applied. The employment areas in Brent have significant variations in levels of access to public transport and other individual characteristics. A distinction is made between areas of the borough to the north and the south of the Dudding Hill railway line as this broadly reflects variations in public transport provision. The provision of parking in new developments below the standards set out in the table is encouraged (see car free/car capped section).</p>

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
6.8 Transport		Alice Whitehead	Create public transport infrastructure which allows people to access the City of London, and road infrastructure which allows people to drive out of London quickly.	Noted. Overall Brent benefits from good overground and underground links to Central London. Brent is connected to the strategic road network including the North Circular and A5 which connects to the motorway network.	No change
		Sunil Shah	Public transport will be overstretched and needs to be cheaper.	In London public transport fares are set by the Mayor of London. The Plan, informed by the Brent Long-term Transport Strategy and Local Investment Plan, identifies investment in public transport, walking and cycling to support growth.	No change
6.8 Transport		Giacomo Vecia	Regarding the Transport section, I support the strengthening of each of the four proposals, namely: u. Safeguard land for the West London Orbital route and work with TfL, the GLA, Network Rail, and all other relevant partners and stakeholders to deliver this as soon as possible. v. Create high quality pedestrian connections from Brent Cross West Thameslink station prior to the completion of the station to all key nearby destinations, including Staples Corner. x. Double the distance of existing cycle links across Brent through delivering transformative cycling projects, including from Kensal Rise	u. introduction to policy BT1 refers to working with partners. Safeguarding referred to in policy wording but for consistency and clarity added here. v. Amended to in parallel with delivery of the station. X. The Brent Cycling Strategy sets out proposed cycle routes. Policy to be amended to cross-reference this strategy. y. public realm is to be designed to meet healthy streets principles which encompasses the points outlined around quality routes. Healthy streets encompasses pedestrian comfort guidance.	BT1 g) safeguard land for and enable the delivery of the West London Orbital overground; h) create a high quality pedestrian connection from Brent Cross West Thameslink station to Staples Corner and the wider area in parallel with delivery of the station; c) provide for and make contributions towards connected, high quality, convenient and safe cycle routes and facilities in accordance with the Brent Cycling Strategy, including cycle parking, in line with or exceeding TfL and WestTrans

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			and Kilburn to Church End via Willesden Green, and from Harlesden to Cricklewood. I would also support a separate point on pedestrian priority, namely: y. Ensure that all new developments have access to convenient, high quality pedestrian routes and that pavement widths adjacent to these developments are increased (or at a minimum maintained).		design standards, including the implementation of new Quietways and a borough wide cycle hire scheme;
6.8 Transport		Sport England	Support promotion of Active Travel and Healthy Streets. Recommends also require Active Design, for example securing cycle storage and repair at transport hubs.	Support for Active Travel and Healthy Streets noted. Local Plan includes policy to secure cycle routes and supporting facilities. It is considered the Plan's policies encompass the 10 principles of Active Design by promoting active travel, requiring access for all, high quality public realm, securing open space, encouraging co-location of facilities and directing development to accessible locations well served by facilities.	No change
6.8 Transport		Nancy Platt	Step free access needed at Queen's Park and Northwick Park. Support car free and car clubs.	Note support for car free development, car clubs and step free access at Northwick Park and Queen's Park. The council will continue to engage with TfL and Network Rail on increasing stations in the borough with step free access. Queens Park has gained funding to address step-free access, Northwick Park will be	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				subject to improvements in association with the Growth Area development.	
6.8 Transport		Christine Harvey	The culture will change in time to car free or small electric cars.	Noted	No change
6.8 Transport		Grace Brown	Concern population growth will place pressure on road network and public transport.	To alleviate pressure on road network need to make it easier for people to choose active and sustainable travel. The Local Plan, informed by the Brent Long-term Transport Strategy, sets out how this is to be achieved.	No change
6.8 Transport		Kevin Barry	The Metropolitan Line should stop at Willesden Green.	The line is managed by TfL who determine the stopping service on a commercial basis. Willesden Green is 3 stops from Wembley and Finchley Road station, which are interchange stations on which you can transfer from the Metropolitan Line to Jubilee.	No change
6.8 Transport		Francesca Severn	Support WLO. Also need to improve bus routes. Neasden to Townend Lane is particularly congested.	Comments noted. The council will continue to work with TfL to improve the reliability and frequency of the bus service and ensure routes reflect demand.	No change
6.8 Transport		Daniel Schraibman	The WLO is an excellent idea which makes use of existing infrastructure.	Support noted.	No change
6.8 Transport		Rita Valentini	People are moving to Brent due to good tube links to Central London, but Jubilee line is very busy at peak time. A direct bus route to Central	TfL develop the London bus network. The Council liaises to ensure service provision is sufficient for the needs of its residents. Direct routes can be too	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			London is needed to reduce pressure.	long to be consistently reliable in relation to keeping to timetables.	
6.8 Transport			Need more cycle routes and improvements to existing routes.	Noted. The Local Plan policy seeks to support the Brent Cycling Strategy by securing additional routes.	No change
6.8 Transport		Veenay Chheda	People are afraid to walk due to crime. Control parking and traffic will improve.	The Plan acknowledges safety can be a barrier to people walking and cycling and includes measures to help address this. The Plan requires streets to be designed to Healthy Streets standards, and an important aspect of this standard is safety. Car parking standards will be controlled in line with London Plan standards.	No change

DELIVERY AND MONITORING

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
7 Delivery and Monitoring	7.1.12	Brent Council (Schools Team)	Reference to two primary schools is incorrect. Should refer to one and one potential special needs school. The provision of a new 6FE Brent North School will be on the Chancel House site.	Noted.	Amend text to refer to one primary school and one potential special needs school.
7 Delivery and Monitoring	7.1.12	Department for Education	Welcome reference to provision of new schools.	Noted.	No change
7 Delivery and Monitoring	7.1.15	Thames Water	Content of paragraphs 7.1.15 and 16 supported. Additional text should be considered either in policy or supporting text to allow for provision of water and waste water supply and management.	Much essential water infrastructure provision is permitted development. The NPPF's presumption in favour of sustainable development and policy DMP1 allow for positive consideration of such applications and it is considered that there is not likely to be any significant risk of applications for such facilities being refused without the inclusion of a policy.	No change
7 Delivery and Monitoring	7.1.17	Sport England	Developments could contribute towards delivering and maintaining playing field sites either by s. 106 and/or CIL provided the CIL Reg. 123 is appropriately worded with appropriate evidence base used.	Noted.	No change
7 Delivery and Monitoring		Giacomo Vecia	Monitoring needs to include transport related measures.	Agreed this should be added.	Add to Policy Performance Measures: Modal share of journeys made by walking,

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
					cycling public transport and private vehicle.
7 Delivery and Monitoring		Philip Grant	Monitoring its policies is an area where Brent has failed and must do better in future.	Noted. Monitoring will be provided in the AMR.	No change
7 Delivery and Monitoring		Veenay Chheda	Deliver on current issues first.	Noted. The monitoring addresses the effectiveness of the Plan's policies.	No change
7 Delivery and Monitoring		Harini Boteju	Monitoring needs to take account of Green Infrastructure provision.	The monitoring can incorporate what is included in the GLA's LDD related to Green Infrastructure which is "loss or gain or change of use of open space".	Include reference to change in amount of public open space as a monitoring measure.
7 Delivery and Monitoring		Kensal Rise Residents' Association	Net change in trees should be monitored with no net loss being the target.	This will be very difficult to monitor as not all trees are subject to controls.	No change
7 Delivery and Monitoring		Kevin Barry	Too complicated	Noted. The monitoring has been kept as simple as possible to enable appropriate data to be collected.	No change

OTHER

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Other	Maps	David Walton	Show all railway lines which cause major Brent urban severances.	Incorporation of railway lines either on the key diagram or place diagrams would give a useful overview of significant physical features as a point of reference within an area. In looking into this further it created busy images. The inclusion of stations gives a reasonable indication of where lines run.	No change
Other	Places chapters	OPDC	A clearer alignment with and cross referencing to policy BE2 is needed (similar to approach taken in BP5, part j). This is required to clarify which sites/locations within the different places are being supported for industrial intensification or co-location.	Noted. See proposed change.	Provide clarity throughout document as to which site allocations will be subject to policy BE2.
Other	Places chapters	HUDU/ Brent CCG	Places layout and structure relatively easy to follow, and each high level plan useful. Could be helpful to indicate expected 5-year growth levels. May be appropriate to have health and related facilities and other social infrastructure dealt with differently across the Places. It would be helpful to discuss the health implications of growth to ensure the next iteration of the plan accurately reflects needs and the emerging Infrastructure	Noted. See proposed change. Anticipated growth levels are included within the Annual Monitoring Report. These figures are time relevant and would not age well in this document due to fluctuations in expected provision. Site allocations provide an indicative summary of what should be considered/provided. The emerging Infrastructure Delivery Plan will provide more clarity as to the provision which is required and	Updated Infrastructure Delivery Plan.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			Delivery Plan. Each site allocation includes an infrastructure requirements section. On a limited number of sites, it indicates on-site infrastructure but not that required to be provided off site which will typically be the case for health.	to be delivered/where. Input from CCG and HUDU is welcomed.	
Other	Place maps	OPDC	Label and depict the boundary of the OPDC area on place maps shown on the introduction to each place.	Agreed.	Include where relevant the OPDC's boundary on each place map.
Other	Site Allocations	Environment Agency	Several allocated sites including but not limited to those listed below, lie within Flood Zones (FZ) 2 and/or 3, with some containing FZ3b or 'functional floodplain'. Functional Floodplain BCSA3: BROOK AVENUE BSSA8: ARGENTA HOUSE AND WEMBLEY POINT BSSA6: BARRY'S GARAGE BCSA6: WATKIN ROAD BCSA11: COLLEGE OF NORTH WEST LONDON WEMBLEY BEGA1 NEASDEN STATIONS GROWTH AREA BESA1 COOMBE ROAD BESA2 CRICKLEWOOD BUS DEPOT EDGWARE ROAD In line with NPPF para 157, allocated sites must demonstrate passing the Sequential Test used to steer development away from the highest fluvial, surface water and	The Council will undertake the necessary sequential assessment. Clearly as it cannot show it is meeting the current draft London Plan housing target from other sites that it has identified as being available for development, there would not appear to be any other reasonable sequentially available alternatives. This however will be fully assessed in the sequential test.	Progress a sequential test of all sites that encroach into Flood Zone 3 prior to publication.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			groundwater flood risk areas. The Integrated Impact Assessment (IIA) November 2018, demonstrates that flood risk has been taken into account and used to assess the suitability and planning concerns associated with each site. However, it is inadequate in demonstrating that it has been used to prioritise the allocation of sites as per the Sequential Test hierarchy and that there are no other suitable sites available. If this is not overcome, we will identify that the Plan is not sound during the Regulation 19 consultation stage. If the Sequential Test has been applied, the justification for this will need to be provided within the plan.		
Other	All site allocations	Greater London Authority (GLA)	Place maps should illustrate the extent of site allocations and other key designations e.g. industrial sites, opportunity areas, town centres, areas for tall buildings, etc. Allocation sources could be included e.g. masterplan, SHLAA, etc.	Agreed, that some additional information could be added to the Place Maps which due to printing issues did not reach the quality that was anticipated when they were proposed.	Amend Place maps to provide more information, but not so much that they become compromised in terms of simplicity/ legibility.
Other	Appendices	HUDU/ Brent CCG	Appendix 2: Object to omission of reference to the role design can play in promoting health and wellbeing and tackling health inequalities. Appendix 4 Parking Standards Welcome inclusion of para 8.4.9 parking standards for hospitals. Para 8.4.11 parking for D1 uses is	Appendix 2 is a factual assessment of the content of SPD1 against the contents of London Plan policy on design. SPD1 contains reference to Active Design and captures the essence of what should create healthy places. The appendix recognises that car	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			too prescriptive for a Use Class with such a diverse range of uses. Brent CCG normally seeks one space per clinician and additional parking depending on the facility's size and nature. Emergency vehicles and patients' drop off/pick up space is also needed. Appendix 7 Glossary: Should include Health Impact Assessments (HIAs) if included in the Plan.	parking requirements for D1 uses vary, but sets out a desired level for visitors. Taking account of the recognition of the differing needs, the Council will approach each case on its merits, particularly taking account of the needs of staff and ambulances/ support vehicles.	
Other		OPDC	There is an opportunity to reflect OPDC's Local Plan which identifies where joint working would be helpful to better connect the OPDC and Wembley area in Brent's Local Plan	Agreed. This could be clarified particularly in relation to Willesden Junction/ Harlesden area.	Insert within the south area on the priority to improve connectivity between Old Oak and Harlesden through an enhanced Willesden Junction Station (including over-station development) and wayfinding.
Other		Martin Breakspear	24hr bus lane from Wembley Triangle to North Circular not needed. creates unnecessary congestion and air pollution. Should only be peak time. This will get worse with the ULEZ. Council is making parking more difficult changing more free parking to payment, making small businesses lose trade/ close down/ vacant/ vandalised premises with customers using retail parks.	Noted. The lane provides greater certainty of bus journey times and is therefore an important part of encouraging greater use of public transport, whilst discouraging unnecessary private vehicle trips. Payment for parking takes account of a number of factors including ensuring turnover of space to support trade but discouraging unnecessary trips.	No change
Other			Lack of enough cultural centres in Brent and particularly Neasden area. Need more cinemas, theatres,	Brent has many cultural facilities, but many more different cultural groups than other areas. Often	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>exhibition centres and libraries. Some road surfaces are very poor, e.g. Press Road.</p> <p>Neasden is missing major supermarkets with the closest 1.8 miles away.</p> <p>Neasden local businesses need more investment to attract a wider audience.</p>	<p>these facilities are not as well used as they could be as they are reserved for one group. The Plan supports their greater use/ efficiency as spaces as well as provision of new facilities in well located places.</p> <p>Neasden has reasonable access to low cost supermarkets, e.g. Iceland and Lidl (Blackbird Hill is 0.7 miles away). A major supermarket in this location is unlikely due to lack of need as evidenced through the retail study (2018) and lack of availability of sites.</p>	
Other		Sudbury Town Residents' Association Forum	<p>To reflect Brent's ethnic diversity, the Draft Local Plan documents should have been translated. The consultation period clashed with a festive and holiday period and should have been extended to early Feb. The questionnaires are detailed and long. Workshops and Drop-In Sessions should have been assisted by translators.</p>	<p>Specific requests for translation or support to address disability would have been considered. It is not Council policy to automatically translate documents or provide translators at meetings. The consultation period was extended from minimum 6 weeks to longer to reflect the holiday period.</p>	No change
Other		Steve Hilditch	<p>'Providing homes in genuinely mixed communities across a range of tenures' – used by developers to reduce social rented homes provision. Every site capable of producing social rented homes must do so to the maximum, even if 100% rather than trying to socially engineer a mythical ideal community based on</p>	<p>The London Plan sets out a tenure mix that supports intermediate affordable housing products provision in developments. The Council has to be in general conformity with this.</p> <p>Again in relation to private rent, this is promoted in national and London Plan policy, as such Brent must</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			tenure. Encouragement of 'higher quality market rented properties' is not justified. It is an invitation to developers to make proposals that are not in the community's best interests, making almost no contribution to meeting identified housing needs, particularly of genuinely affordable housing. Less preferable than the usual S106 of social/ London Affordable Rent associated with homes for sale. The Plan must push the boundaries of policy as much as possible, reflecting local needs.	support its development and seek the types of affordable homes that can reasonably be expected to be delivered through this product.	
Other		Grace Brown	Are you serious? Mr average will get through all this? Well you ticked the big Consultation box.	Noted. There has been much consultation in previous stages which allowed people to put forward views when the documentation was more shorter and less clearly advanced.	No change
Other			Brent Council is a shambles	Noted. This is not consistent with the views of most residents surveyed independently.	No change
Other		Neera Hirani	Oblige retailers and landlords when refurbishing to remove redundant façade wiring and decaying structures Coffee shops terraces: Support and Willesden Green would benefit from lower charges to outside terraces to help street animation Victorian terraces: Protect with clear	This is outside the remit of planning if planning permission is not required. Town centre action plans will address how town centres can be more animated. The Council has clear guidance on residential extensions. Differential rates of Council tax	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>extensions, loft conversions and front garden alterations design guidance even outside a Conservation Area.</p> <p>Empty properties time limit: set a maximum period in policy with penalties thereafter.</p> <p>Retail : shouldn't be used as storage units</p> <p>Willesden Lane / Walm Lane crossing : gateway marred by traffic accidents needs improvements and to be pedestrian friendly with railings removed, safe crossing points and lower speed zones</p>	<p>exist for empty properties to discourage them being left vacant. If retail is used purely for storage then this is potentially an enforcement matter and should be reported to planning enforcement to investigate.</p> <p>The street scene in Willesden Green will be subject to improvements.</p>	
Other		Robert Donovan	<p>Cancel plans for more homes!!</p> <p>Spend on police, control Private Landlord HMO's and sub-letting of Council Homes.</p>	<p>Noted. New homes have to be planned for to meet local needs and targets set in the London Plan.</p>	No change
Other		Shabbir Bharmal	<p>Coffee shops terraces: Support and Willesden Green would benefit from lower charges to outside terraces to help street animation</p>	<p>Agreed improved animation would help the centre. This is a matter which the town centre action plans and town centre managers can seek to address. It is not a planning matter.</p>	No change
Other		Rishi Shah	<p>Disgraceful, how can you quote "Responsible Growth Strategy Infrastructure" when NOT building new roads/ resolving congestion but want to increase it, you all need to quit.</p>	<p>Noted. Building new roads will not resolve congestion and will reduce quality of life as it will encourage greater use of the private car.</p>	No change
Other		Jo King	<p>Appalled at Wembley's change in last decade. Amounts of high rise buildings, betting shops and tawdry take always on the High Road lead</p>	<p>Noted.</p>	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			to a resoundingly unattractive area. Not a multicultural area resulting in business failures and seems a world away from South Brent.		
Other			Don't listen to NIMBYs. Like taller buildings and higher population density makes efficient cities	Noted. Brent has a diverse population with different expectations and for some taller buildings are welcomed. They will be necessary and appropriate in the right locations to meet requirements for homes and jobs.	No change
Other		Luca Taschini	Policy should set maximum period for properties (residential and retail) to remain empty without penalties. Victorian terraces front and rear gardens green policy -- a minimum percentage in addition to permeable pavements to avoid loss of historical character	There are mechanisms outside planning that can address this, such as increased Council tax and incentives to bring properties back into use, e.g. grants for repairs. There is a minimum policy for green space in front gardens when providing new parking. Permitted development rights mean that the Council cannot stop people paving over their front and rear gardens if they choose to do so.	No change
Other		Neera Hirani	ENVIRONMENT Trees : appropriately sized trees should be planted in Willesden Green North circular : delivery of a meaningful dense shrubbery, trees, ivy and other species green belt for filtering vehicle pollution along its length to protect residents Recycling / waste points : make available semi buried recycling/waste	Additional tree planting is occurring in Willesden Green. The pavements on the High Road have a lot of utility infrastructure under them and at points are tight given the pedestrian flow. As such it is not possible to plant trees on some parts. The North Circular environment does need improvement. The Council's air quality strategy will	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>points in Brent's core areas following European example Brent Internet coverage: should be fully available. Victorian terraces front and rear gardens green policy -- a minimum percentage in addition to permeable pavements to avoid loss of historical character Gladstone Park: Provide a farm/bird conservation centre should be provided to help activate it and bring an educational facility to children. Environmentally friendly buildings: policy that rewards solar panels, green roofs, rain water recycling, etc... Electric car charging points : more required to encourage change to friendlier transport alternatives</p>	<p>look at measures to reduce adverse impacts of air quality along its length, including planting. There is some innovation in waste collection, e.g. Wembley Park. It will however be very expensive to retro-fit older areas. As such this is unlikely to happen. The Council is working with utilities providers and the GLA to improve speed and breadth of internet coverage. There is policy on percentage of front gardens that should be soft landscaping. This can be encouraged, but cannot be required where a front garden has already been paved over. The Council will work with 'friends' groups on parks to improve facilities where the issue of long term stewardship is clear and it does not create additional burdens on the Council's revenue budgets. London Plan policies require minimum use of energy on major developments, flood prevention policies do require controls on surface water run-off, etc. Electric car charging points are required as part of major developments.</p>	

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Other		Steve Hilditch	Plan does not correct local failings contributing to less than 20% affordable housing delivery. How can excellent delivery like South Kilburn's be replicated? Is the viability review 100% correct in all circumstances every possible benefit from planning gain being extracted? Could it have used its own land better? Wembley also deserves some critical appraisal. The plan should be more forthright in this respect.	The viability assessment is more often than not now also reviewed by the GLA. The Council has to work within the parameters set by national policy/ guidance. In relation to Wembley, again these assessments have been subject to GLA scrutiny.	No change
Other		Viv Block	Hope planning permission not granted for the Mosque at 854-852 Harrow Road. Object to further 24,000 homes in Brent. Area under siege from new school inputs, infrastructure cannot currently cope. How can thousands of families be incorporated? Roads are inundated with very few parking spaces left. If this plan were to go ahead, the tower blocks would require adequate parking facilities for the petrol guzzling 4x4's used by large families.	Noted - it will go through the determination process in the appropriate way. Noted. The Council has to plan for the additional homes. It is recognised that there will be pressure on infrastructure. The Council will seek to plan for additional provision along with other organisations, but there is a significant public sector funding deficit from what is required in an ideal world and what will be delivered.	No change
Other		Elayne Coakes	Long and confusing document, using artificial places rather than existing names, with an equally complicated questionnaire to wade through even to answer on a specific item.	Noted. The Places were considered to offer the balance between making areas more local relevant, whilst not creating so many as to extend the length of the document significantly. A simple questionnaire/ response was available to provide answers.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Other			Brent's Good Growth already irreversibly compromised by insane Council policies. Push toward more housing, more business, more this and that (responsible, affordable... all buzzwords with no honesty or clarity), demonstrates unequivocally that local and central politicians fail to realise that the root of all problems in modern societies is OVERPOPULATION.	The Local Plan to be consistent with national and London Plan policies has to plan to meet housing and employment needs related to its predicted population growth. It is not the role of the plan to limit population growth.	No change
Other		Highways England	The M1 is heavily congested throughout the peak hour periods. Any material increase in traffic on this would be a concern. Pleased to see Highways England referenced and consultation clarity on developments that may impact the M1. The Local Plan proposes a high level of development. The transport evidence base following this review should provide an indication of the residual impacts on the statutory road network. Anticipate impacts clarification prior to submission for examination. Happy to meet and further discuss this in more detail.	Noted. Brent tries to limit the amount of additional traffic movement by seeking car free or reduced car-parking developments. It is considered that measures such as the extension of the Ultra-Low Emissions zone will have much more significant impacts (as yet unknown) on the volume of traffic using the North Circular and therefore impacting on the M1 than very limited (if any) additional car parking/ peak traffic movement associated with potential development adjacent to Staples Corner.	No change
Other			Happy for more true Council rented housing only as the only way to alleviate misery and hardship. Right to Buy is a nonsense as is affordable housing being provided.	The Council will seek to prioritise the cheapest forms of affordable housing against a background of London Plan and national planning policy and funding mechanisms which place a greater weight on	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				intermediate products to encourage home ownership.	
Other			Not able to see convincing proof that area needs amount of extra housing amount particularly given Brexit. Needs to be reassessed once repercussions are clear.	Brexit will have little or no impact on immediate needs as these are so great. Brent's existing population is comparatively fertile and it still proves to be an attractive destination for non-EU immigrants and UK migrants seeking London employment opportunities.	No change
Other		Mary Duffy	Very concerned by draft Local plan which I suspect it is driven by developer wishes and manufacturing residents consent, bypassing planning regulations and common sense. Dollis Hill and Neasden residents do not want what has happened around Wembley Stadium under a Labour Council. Councillors who oppose high rise/high density dwellings are not taken account of. Quintain developments (holds funds off-shore but relies on CIL funds for infrastructure) and others benefit the few as rents are unaffordable to average working people.	The document reflects the needs to be consistent with national and London Plan policies and to provide for identified needs associated with predicted population growth in the borough and across London. The financial arrangements of private developers is not a planning consideration.	No change
Other			Worried about thousands of new homes in the Wembley Stadium area. Pedestrian and public transport movement is already difficult. Feels so cramped and crowded. Event Day Outlet Centre shopping is not an option.	The Wembley area has some of the best public transport accessibility and therefore it makes sense to provide more homes/ jobs here where there are options for how people can travel. Outside of peak times and event day visitor	No change

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				timings incidences of congestion are limited.	
Other			Document is far too lengthy, contains a great deal of material of no or very little interest to a local resident. Needs an executive summary to identify the main ideas and proposals. Am a lawyer used to reading technical, data-heavy documents. This one is very poorly put together!	The vision and objectives, together with the place based opportunities/ review provides the summary.	No change
Other		Chirag Gir	For residents unable to attend the Consultation Events, the form is difficult to understand and it is not clear which sections to complete. The Drop-in Sessions needed to be more open and transparent, my questions were answered but resident's don't always know what to ask.	There were simpler forms to fill in and it was made clear that any comment would be accepted. The drop ins were informal and officers when there was time sought to prompt those who attended on matters that might be of interest.	No change
Other			Totally disagree and oppose any more high rise, commercial or residential in Sudbury Town area	Noted. The Plan does not promote high rise in Sudbury Town, but does support medium rise (around 5 storey) in some locations.	No change
Other		Caroline Bottoms	Support overall objectives, especially the need for genuinely affordable family accommodation with security of tenure and the ability put down roots. Not everyone lives in nuclear families, other larger and smaller household types, have equally pressing needs including disabilities, with implications for internal layout and external access.	The Plan seeks to provide for a range of housing types, including less mainstream homes, e.g. wheelchair accessible. Any boundary drawn is likely to 'chop' recognised ties/ communities. Officers have sought to consider connections with the surrounding areas in the Places	Consider further linkages/ interactions between places and where this should be noted/ policies amended.

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			The Places division made review harder for those on boundaries and risks segmentation of natural communities and wards. Did attend a consultation event but left as there was no team member who knew my neighbourhood and could engage sensibly.	and have not had a solely insular approach.	
Other		Ciara McCombe	<p>Pleased amount of housing being built, but worried it is concentrated in Wembley Park and unaffordable for Brent residents. Quintain's project seems to be excluding low socio economic groups (which encompasses most of Brent). Oppose increasing events in Wembley Park. Traffic is poorly managed making getting around Wembley difficult. Event days do bring a great deal of trade close to the stadium, but adversely affects areas further away such as Harlesden.</p> <p>Disagree with Wembley Stadium's ramp replacement with steps. Extremely concerned about Quintain's influence on Brent council; it needs investigating.</p>	<p>Noted. Much is within Wembley Park, but the majority is elsewhere within the borough. Wembley Park development is subject to financial viability review to maximise affordable homes provision. Development has been costly due to issues such as remediation costs to deal with the extensive impacts of the previous industrial uses/ underground structures. Improvements to event day traffic management continue to be made, but it is recognised that it is disruptive for many residents. The steps will enhance the local environment. Quintain does not have favourable treatment from the Council.</p>	No change
Other			Welcome consultation. Worry that as information is only available online it excludes non-web savvy senior citizens.	Noted. The Council has balanced up the need for transparency with the need to save paper/resources. Requirements to access paper background documents will be very limited and necessitate a visit to a	No change

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				library where staff are available to assist with viewing the documents on line for free.	
Other		Steve Hilditch	<p>The draft and housing needs assessment identify an overriding requirement for social rent (or the mayor's London Affordable Rent) homes as the only genuinely affordable tenures for the majority of those in affordable need. Plan could do more to focus on this, rather than housing that does not meet needs. Although the reality is that current national plans and resources make it impossible to deliver the affordable homes that Brent needs, the plan needs a franker assessment of the affordability gap and its implications for Brent's people.</p> <p>The council should dedicate resources and efforts to maximising social provision through land assembly, tighter monitoring and direction of housing associations and the use of public land in the borough. The evidence base is clear that the vast majority of Brent residents cannot afford full market homes to buy or rent or the products that are villainously described as 'affordable'.</p>	<p>The Plan seeks to prioritise social/ low cost affordable rents. The Council is working in delivering on its own sites as a developer and also supporting registered providers to build more homes in the borough.</p> <p>The term affordable, due in a large part to changes in Government definitions has become discredited in the eyes of most. This is why the Brent Local Plan prioritises more affordable rented properties.</p>	The Local Plan viability assessment showed that 70% London Affordable rent would work as a percentage of the affordable housing delivered on sites and as such the policy has been changed to seek this plus a 30% intermediate split.
Other			What are the plans for Wembley central and Wembley Park, with all the high up buildings, High Rents, High Mortgages? Soon will be cycle	High housing provision reflects high needs and prices reflect scarcity of product and access to finance. A person's 'freedom' actions often	No change

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			lanes and banning cars. Heading to communism, no liberty, no freedom with rights only for the few?	has unintended negative impacts elsewhere. E.g. freedom of diesel vehicle driving is often at the expense of the air quality of those who cannot chose to live anywhere else.	
Other			Could have been presented more concisely, less detail on each individual project might have made for an easier read.	Noted. It is a difficult balance to strike - clarity Vs brevity.	Review plan to reduce content where possible and improve clarity.
Other		Francine Omachi	Why is Council consulting on preferred growth when it's clear existing infrastructure i.e. sewerage, schools, medical centres, roads will not cope with more building? Wembley suffers congestion, especially on events days, which these proposals will only aggravate. Low grade food outlets have a potential to attract antisocial behaviour. Is this whole process assuming resident apathy as many people will not have the strength and staying power to read it all.	Noted. New homes have to be planned for to meet local needs and targets set in the London Plan. It is accepted that with more people will come more congestion. The plan seeks to limit low-grade food outlets. The Plan has sought to engage with local people. On the whole the reaction to change has been met positively by the population.	No change
Other			Kensal Green area needs lots of improvement such as: new homes /children's activities and GP surgeries.	Noted. The area is not identified as one in which a significant number of new homes will be delivered. As such other infrastructure provision is likely to be limited.	No change

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Other			Tired of so-called consultation due previous experience - Council takes no notice. It closed Stonebridge Adventure despite massive petition, next it's youth clubs, Bridge Park...	Noted. The Council has to balance up a number of competing priorities in all decisions that it makes. Due to the pressure on public resources the choices are sometimes not those that it would otherwise willingly take.	No change
Other		Hashim Nawrozzadeh, Roya Shirzad, Gul Pekai Nawrozzadeh, Sasan Sarab, Rafiullah Jahan, Adnan Tariq, Mohammed Karim, Nabeel Anwar Hussain, Mohammed Hassan Nawrozzadeh, Abdul Majid, Ahmed Al-Hassani, Laila Asghari, Seyed Rasoul Shahrestani, Kobrah Nawrozzadeh, Adeyemi Omoniyi Fasogbon, Munther Hussain, Jay Shahrestani, Hassan Amiri, Abdul Hadi Saai,	Under-used industrial sites such as Staples Corner which have been poorly developed provide the opportunity for mixed use development to improve their effectiveness. 150 Coles Green Road which was destroyed by fire has not been able to support redevelopment due to lack of viability as an industrial site, its location adjacent to residential blocks provides such an opportunity.	The Council has identified Staples Corner as an intensification area to include mixed uses subject to a master planning process supported by the GLA.	No change

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		Ali Kalan, Ahmad Asghari, Haidar Ali Nawrozzadeh, Yousuf Nawrozzadeh, Elham Sadat Asghari, Elleyene Asghari, Srijana Chalise, Mustafa Field, Jackie Vaughan, Hussein Al Taey			
Other		Shruti Soni	<p>Intensification corridors needs fine-tuning taking existing context into account.</p> <p>Social infrastructure within walking distance should be made an absolute priority within new high density developments to stop traffic generation. 4 and 5-bedroom family sized accommodation should also be built in the high density housing developments, not just 3. Undertake an audit of the uptake of wheelchair friendly accommodation in the build to rent sector.</p>	<p>Agreed that some fine tuning is needed, this can be provided through additional design guidance on appropriate development solutions. There does however need to be a realisation that these areas are identified for increased development which will change their character.</p> <p>Agreed, this will sought to be achieved wherever possible.</p> <p>Larger properties will be encouraged, for market dwellings this does however need to be balanced up against impacts on viability as it could adversely impact on affordable housing delivery. There will be a minimum number of wheelchair accessible dwellings in all major housing developments. The council cannot however control who occupies</p>	No change

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				these dwellings, particularly private sector rented or owned.	
Other		Environment Agency	Invasive Non Native Species All sites in close proximity to a watercourse should include the opportunity to remove, and highlight the risk associated with, invasive non-native species (INNS) that occur along Brent's waterways and surrounding areas. Japanese Knotweed, Himalayan Balsam, Giant Hogweed and other INNS are prevalent. They affect local biodiversity. Some can negatively impact flood defence structures, increasing the risk of flooding.	Where the ownership of the watercourse and its associated hinterland is under the control of a development site owner this would be a reasonable request. Recent court judgements indicate that where a landowner is aware of invasive species and allows it to encroach into other areas of land not in their ownership that they are potentially liable for costs associated with dealing with the nuisance. As such it is likely that landowners will now take a more cautious approach to ensuring that invasive species are not allowed to spread. This issue can be appropriately addressed through criterion g) of the BGI1 policy and invasive species are identified as an issue in the policy justification.	No change
Other			Totally ridiculous to expect people to respond to the document. For thousands spent on King Edwards Park Wembley and it's worse...drainage awful....so called cricket pitch gone....	Noted. Improvements to King Edwards Park are on-going.	No change
Other		Metropolitan Police Service	It is essential to deliver the necessary policing infrastructure to support the growth. CIL charges to support policing is necessary and appropriate. Until CIL is collected for	Noted. There needs to be greater clarity from the police on what are considered to be justifiable police infrastructure needs related to the impacts of development against a	No change

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			police infrastructure, funding should be collected through Section 106 contributions.	backdrop of the planned reduction in the Met's estate across London that will support changes in policing practices.	
Other			Good to see thought being given to how to develop this area. Important not to just let big developers get their way, thought must be given to current residents.	Noted. Developers do not 'get their way' but have to meet policy requirements consistent with the presumption in favour of sustainable development.	No change
Other			Brent does not need more housing or affordable housing or to be built up to accommodate more people. It needs less people for less traffic and street parking. My environment, my decision, NOT yours. Your mission is to let current housing prices increase to preserve current residents' lifestyle and freedom to move around comfortably and considerately. The answer is NO to ALL plans in this draft or any other related to it any shape or form.	Noted. This is not a credible option. New homes have to be planned for to meet local needs and targets set in the London Plan related to population growth.	No change
Other		Elizabeth Lindsay	More free public toilets as in Australia. Human right! More charging points for electric cars.	The draft London Plan has policies which require the provision of public toilets in larger developments. Electric charging points are now being provided as part of developments consistent with planning policy requirements.	No change

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Other		Amanda Hervey, Jon Harahap	North circular perimeter: Implement an appropriate and meaningful dense shrubbery, trees, ivy and other species green belt filtering vehicle pollution to protect residents	Such interventions will be considered as part of the process of reducing the adverse environmental impacts of this road. The largest change will come from environmental legislation outside the planning regime which limits the sources of pollution.	No change
Other			Local Plan area description is not one in which I recognise I live. Draft appears to fit Council's desire to redevelop.	Noted.	No change
Other		Shruti Soni	Compared to other boroughs, Brent's delivery of new housing development has been disproportionate. Partly as they better consider existing residents lives. Growth should be done sustainably, enhancing existing community's lives, rather than pushing them out.	It could be argued that in not meeting higher targets other boroughs have been neglecting the needs of their most vulnerable populations and forcing people to live in crowded conditions or move elsewhere. As well as a positive attitude towards regeneration/ inward investment Brent has lower levels of environmental constraints than numerous other boroughs which mean it is better able to identify sites for new homes.	No change
Other		Department for Education	To be 'effective' the plan needs to adequately address the additional school places required to meet demand increases. Brent's S106 Planning Obligations SPD is now over 10 years old, prior to the introduction of Brent's Community Infrastructure Levy. It should be updated to ensure appropriate	The majority of funding for additional infrastructure will be through CIL. S106 obligations will only relate to site specific requirements, e.g. provision on-site which will be off-set against CIL liability. Colleagues in education planning have been consulted on need for new schools. The	Where possible identify sites for new school provision in addition to that already done.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			solutions for the right infrastructure to be secured.	complicated nature of this process for longer term planning, together with the results of an extensive capital programme more recently and two planned secondary schools means that in the short to medium term in addition to Chancel House and the former Oriental City development site no new site specific needs have been identified in this Plan.	
Other		Chirag Gir	Openness and Transparency. Be more proactive in bringing things to residents. Don't hide	A leaflet was posted to every household in the borough to raise awareness of the Plan consultation.	No change
Other		Sport England	Consider the plan unsound as it is not currently positively prepared, effective nor consistent with national policy. It needs policies for indoor and outdoor sports facilities taking account of NPPF, paragraphs 96 and 97, and Sport England's Planning Policy. The policies, need an up to date evidence bases, currently missing for playing pitches. Site allocations should not advocate loss of sports facilities unless replaced. In addition, Active Design should be embedded within the design and specific space policies. Employment areas should also have sufficient flexibility to accommodate sport and leisure facilities.	Noted. An up to date pitches assessment has been undertaken and this will support the Plan through its next stages. Where sites have public/ community access to sports facilities then it is considered appropriate to seek their retention and the Plan has been amended in relation to specific Sport England comments to do this. Active Design is included in the Council's SPD1. Due to the pressure on employment land and the borough's status as a 'provide capacity' location flexibility is very limited and the Council will not encourage it, but would encourage pre-application advice on the prospect of planning permission for	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				those keen to pursue recreational uses in employment areas.	
Other			Pages 112-114: Note smaller Pellat Road Sports Ground mentioned for improvements but not larger John Billam and Tenterden Sports Grounds. Why?	Resources for open space improvements will be directed towards those which have been identified in the Open Space Study as needing the most urgent attention. This does not mean that those other sites will not be subject to investment, but due to their quality currently, it is less of a priority.	No change
Other		Veenay Chheda	Parking: current controls a joke. A "priority" junction after 6 months has yet to be repainted to allow better enforcement. On that basis how can you deliver on increased parking challenges?	Parking management on existing streets is a balancing act where issues of safety are not compromised. Rigid enforcement is not always welcomed by residents.	No change
Other		Neera Hirani	Phone boxes : Now associated with anti-social behaviour in Willesden Green, need replacing with connection hubs Derelict places : should be made available for art to local artists or local school children	There permitted development regime associated with phone boxes is changing which will increase the Council's control over their placement and numbers. In addition new rules on advertising on kiosks will make it less attractive for providers to put in new boxes. This is welcomed. Policies in the plan support meanwhile uses in vacant properties, or areas that will be undergoing redevelopment.	No change
Other			Good plans as most Brent areas need face lift, but does need supporting infrastructure. Alperton now has horrible congestion, not	Appropriate infrastructure will be identified in the Infrastructure Delivery Plan. It will not be possible or desirable to provide	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			enough parking spaces (new buildings must have parking for each flat), more people means more facilities, trains should be multiplied, more frequent buses etc....Hospitals can't cope, A&E should reopen at Middlesex Hospital in Park Royal	such high levels of parking as this impacts on number of homes delivered, cost of development and promotes unnecessary use of the car. There also needs to be an understanding that reductions in public expenditure means reductions in social infrastructure which it can support.	
Other		Viv Block	Object to any new build. Use monies available to improve deteriorating roads, new parking spaces, replacing dangerous broken and lifted paving stones and cutting back trees which during spring/summer/autumn obliterate yellow cameras thus giving another revenue from speeding traffic! Also use it to refurbish/maintain current properties that have fallen into disrepair! When re-painting yellow boxes etc. use bright fluorescent paint and do the kerb edges to help decrease future accidents.	There is no additional funding to do these routine revenue spend activities without additional development creating an additional tax base and other associated funding streams.	No change
Other		Quintain	Photos need to relate to the relevant sections and good quality development completed or underway.	Agreed. Similar to the maps, the print job did not yield the anticipated outcome that was thought to be attained based on previous commissions.	Amend Plan to include more photos and their relevance to the Plan's contents.
Other			Ensure those affected in the area are directly consulted as they probably have a greater insight. Ensure consultations are available in accessible formats e.g. language	Noted. The Council has delivered a leaflet to every single residential property as part of this round of consultation on the Local Plan. If a specific request is made, the	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>wise, disability accessible wise etc. and venues are accessible for all e.g. mothers with children, wheelchair users, etc.</p> <p>Brent should aim to shape itself to be accessible to all, including disability access and inclusive practice whilst consulting and also in delivery e.g. married up dropped kerbs, non-cluttered streets (e.g. not too much street furniture, etc.), more shop mobility in town centres, more ramps into businesses on the high street be they permanent ramps or portable ramps, etc.</p>	<p>Council will ensure that residents with special requirements are met. Venues have been chosen on the basis of their accessibility.</p> <p>The points raised with regards to accessibility are not solely the remit of planning. The Council as a whole has to sufficiently consider the results of its actions with regards to those with a protected characteristic. In relation to planning, some examples of positive provision as 10% of new homes must be wheelchair accessible/ easily adapted under London Plan Policy. Criterion A and J or policy BT1 seek to improve public realm access to all and increase the number of stations with step free access in the borough.</p>	
Other		Neera Hirani	<p>SOCIAL</p> <p>Early years : provide more centres to address many families struggling with affordable early years childcare and associated work disincentive</p> <p>More outdoor activities places : physical and cultural activities for teenagers such as outdoor gyms, adventure grounds, giant chess, horticultural activities, etc...</p> <p>Implementation of more cultural facilities in Willesden Green</p> <p>Willesden Green community plaza : Area in front of Sainsbury's needs</p>	<p>The Council works to ensure that there is sufficient early years provision within the borough. The relationship between costs and low wages is well known and fiscal measures to support parents are predominantly a matter for tax/ benefits policy.</p> <p>The Plan does not stop the provision of outdoor activities places, the main restraint is sufficient public sector finance to support on-going revenue costs associated with such facilities.</p>	Policy BSESA22 design principles, add: Public realm should be of high quality and provide opportunities for interaction.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			improvements/ greening, providing an informal meeting hub/ cultural and commercial events place	Agreed - the Sainsbury's development is a product of a less sympathetic approach to planning in terms of place-making. In the context of its current use and location there is a longer term opportunity for its redevelopment which will open up the potential to vastly improve the public realm.	
Other			Stop developing high rise, not fit for living in for so many reasons... Wembley's ridiculously over developed. No faith will listen to residents. No coherent strategy for this over-development, will be nightmare. Worst of all really important community facilities, such as Gateway, Community centres, Adventure Playgrounds, Youth Clubs and Libraries have closed down.	Tall buildings are part of the strategy of accommodating the additional homes needed. Austerity and reductions in local government expenditure in particular mean that the Council is less able to support community facilities than it has done in the past. Development might create an opportunity to provide additional facilities, but cannot overcome current deficiencies of provision related to wider reductions in expenditure.	No change
Other		TfL Commercial Development	We have identified a number of sites for residential led, mixed-use development towards meeting targets, as well as improved public transport infrastructure. Welcome the inclusion of a number of these sites. Wish to add further sites not included currently (list somewhere submitted with rep).	The Council has considered the sites and proposes to add the allocations of Wembley Park Bridge Road and Queensbury Station Car Park. Aylesbury Street's size, together with the shape and proximity to a conservation area, plus its coverage with semi-mature trees mean that a more detailed design is required to be able to weigh up the desirability of its	Add Wembley Park Bridge Road 0.3 hectares (60 dwellings - reprovide police station/ cells and active frontage along Bridge Road), Queensbury Station Car Park 0.2 hectares (36 dwellings - subject to re-provision of parking and an active frontage along Turner Road) allocations.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				development compared to it remaining as a piece of green infrastructure.	
Other		Department for Education	Schools planning should be 'justified' based on proportionate evidence. An Infrastructure Delivery Plan (IDP) does not appear to have been published. A key evidence base document, it should be a priority. It will be useful to set out clearly how forecast housing growth has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools. If required, the DfE can assist in providing good practice examples of such background documents relevant to this stage of your emerging Plan.	Noted. The Infrastructure Delivery Plan will be published to support the next stage of the Plan. The Council has an experienced schools planning team that uses the latest GLA demography outputs to assist in school place planning. To date the planning has worked well in ensuring that there are sufficient spaces at schools in the borough to meet minimum needs.	No change
Other			The document is clear on the areas in need of improvement and regeneration and I agree with: Kingsbury High Street, Preston Road, Willesden Junction, Harlesden, Wembley industrial estate.	Noted.	No change
Other		Cllr Sandra Kabir	An innovative, ambitious and brave Local Plan is required. Sufficient housing numbers and types (including affordable and private rented) need provision A wide range of uses need to be included in housing developments.	The Plan seeks to provide for a range of housing types. It encourages mixed and mixed use communities. It seeks to support additional employment and commercial space, prioritising town centres for	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>Sufficient commerce to create maximum employment opportunities and support to town centres is required to make them vibrant for retail, housing and leisure.</p> <p>Educational facilities including SEN have to be factored into the plan, with an emphasis on that which supports commerce and industry. Addressing future health needs is essential, including accommodation for NHS essential staff.</p> <p>Parks and open spaces should be protected, maintained and improved, contributing to residents' health and wellbeing.</p> <p>Air quality could be improved in the worst areas such as the North Circular and other arterial roads. If possible diesel-vehicles should be discouraged for example through charging and electric charging points being provided, additional cycle lanes and cycle hire and repair facilities.</p> <p>Safety needs to be considered through design, lighting, working with the Met and Transport Police and more.</p> <p>Intrinsic to all above is the need for everyone to play their part in making Brent an even better place in which to live, work, play and visit. Everyone needs to have a sense of ownership and responsibility and see the benefit</p>	<p>these uses.</p> <p>Education and health facilities will be required where sufficient clarity exists which allows specific sites to be identified for their provision.</p> <p>Parks and open spaces are protected by policy.</p> <p>The Plan contains policies that will assist in improving air quality, such as reducing the need to travel and reliance on private vehicles.</p> <p>Safety is supported through emphasis on good quality urban design.</p>	

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			of participating individually and collectively for the greater good.		
Other			One document cover features Mencap's disability rights and politics (DRAP) group. 3 documents total around 750 pages and should be available in Easy Read (for people who have learning disabilities) and alternative formats for the disabled	An easy read version was available in summary form. As a technical document used to determine planning applications sometimes the language used is not very simple, however wherever possible attempts have been made to make it more easily understood.	No change
Other		Renu Kaul	Needs to be more informative and accurate. It lacks sufficient detail and is contradictory in parts. Needs to adhere to the Sudbury Neighbourhood Plan.	The document is consistent with the contents of the Sudbury NP.	No change
Other		Valerie Gordon	Draft Local Plan runs for decades and change thousands of people's lives, and is a very important document for residents, businesses and community to have the opportunity to contribute to. Advertising and promotion of your 'Have your say' was very lax. Every household in Brent should have been leafleted. Deadline for responses falls over the Christmas period. Hope there is further opportunity to comment.	Every household was leafleted. The consultation period was extended to take account of Xmas/ New Year.	No change
Other		Wendy Martin	Draft Plan needs more realistic consideration. Residents' needs should be taken much more into consideration with genuine engagement.	The consultation is considered proportionate given the resources available to take forward the Plan.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Other		Francesca Severn	The easy read version summarised well	Noted	No change
Other			Wembley Central, Tokyngton, Stonebridge, Alperton wards are over developed and overcrowded with increased crime rates. Stop further development and a ghetto of unruly people. Concentrate on addressing repairs of existing roads, pavements, trees and verges plus parks, not knocking down reasonably maintained council houses and green areas.	The Council has to meet Brent's and the London Plan housing needs. These areas that are relatively low density, with good public transport infrastructure and little in terms of notable environmental constraints are those which will receive the most development. The Council works with ever diminishing budgets to address the matters identified. In terms of Council stock, there is a chronic need for affordable new homes. As such the Council has to use its resources effectively to maximise public benefit, particularly addressing the needs of those who are not housed adequately.	No change
Other			Intense overdevelopment proposed. Will make a hugely stressful, overcrowded place. Need greener developments incorporating open places and trees for positive impact on mental health. Once destroyed, green places will be gone forever.	In the context of worldwide urban development, Brent is relatively low density. The vast majority of development will be on brownfield sites, which more often than not if consistent with policy will increase green coverage of the borough.	No change
Other		HUDU/ Brent CCG	Overcrowding, temporary or poor quality housing, and homelessness contribute to poor health. Providing good quality housing meeting community affordability and accessibility needs should be a	The Plan is subject to the consideration of health impacts through the Integrated Impact Assessment. On the use of Health Impact Assessments in relation to applications, the Council would like	No change

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			<p>priority. Importantly careful high-density housing design should maximise opportunities for health and well-being improvements and minimise potential adverse impacts. The Plan should require Health Impact Assessments (HIAs) used at a level appropriate to the scale of development.</p>	<p>to see some evidence that they result in changes in outcomes before potentially committing to their inclusion in policy.</p>	
Other		Alison Hopkins	<p>Plan is jargon laden and impenetrable to non-planners. Predicated on many false assumptions, it relies far too much on private developers' goodwill. Dollis Hill Infrastructure improvement references, vital if the impractical idea to double our population happens, are absurd. They state, vaguely, that such improvements will depend on businesses working together or the council being able to capture funds. Given past track record, it is relying on a magic money tree. Wholly inadequate consultation. Most Dollis Hill neighbours had no clue about it or its importance. A totally unsatisfactory number and location of supposed public meetings outside the ward meant no one working could attend. Why no residents' associations, community groups, street stalls, or simply door knocking engagement? Really want</p>	<p>Infrastructure requirements will be further identified in the infrastructure delivery plan, but in reality the limits on public sector funding will mean not all needs can be met. Each household had a flyer to promote the consultation. The number of events was tailored to the resource available (staffing and money for venues).</p>	No change

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			to talk to whoever is putting plan together in hope they will listen.		
Other			Present regeneration has increased traffic tenfold with congestion on poorly maintained Harrow Road, North Circular, Ealing Road, Bridgewater Road, Hanger Lane, A40, Forty Avenue etc. High rise developments are an eyesore. Anti-social behaviour has increased with the rising student population encouraging drugs in the area. Offices surrounding old Wembley Stadium moved to greener locations where staff are happier, Wembley Point, Unisys building remain empty because Wembley no longer is attractive place for office staff. High probability that offices built surrounding present Wembley Stadium will be scantily occupied. Further developments in these areas should stop.	Traffic congestion has not increased to this degree. There is no evidence of a significant increase in anti-social behaviour related to students given the significant rise in population. The office market in London is complex, with the majority of new investment occurring in very dense areas of the city and docklands with good public transport accessibility, increased vitality/ viability of high quality place-making and sector concentrations of similar businesses.	No change
Other			Propagation and publicity on this crucial consultation has been very poor. Every Brent household needs WRITTEN notification, rather than relying on social media. Extend consultation until despatching council tax bills to include notification.	A leaflet was posted to every household in the borough to raise awareness of the Plan consultation.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Other		Divia Patel	Temples needs better parking facilities. Need for non-religious cultural spaces for youth activities and older-people	Many temples recognise that they need to encourage non-car use by visitors to reduce adverse impacts on neighbours. These types of facilities are supported by local plan policies, it is their need for funding in a climate of reduced public sector expenditure that is the main impediment to their provision.	No change
Other		Alan Dolan	No clearer proof needed of time to get out of Brent, you will have us living like high density rats!!!!	Noted	No change
Other		Caroline Bottoms	London's underlying population growth assumptions may need to be revisited once Brexit effects become clear. Welcome recognition town centres cannot and shouldn't try to compete with Brent Cross and Westfield, and the focus should be on providing local shops meeting daily needs reducing the need for car travel to large supermarkets. Would prefer small pockets of two or three corner shops or in a parade, no longer drags like Willesden High Rd which should be broken up into smaller blocks interspersed with residential or other provisions, low rise in keeping with existing buildings and not necessarily new build.	In the short to medium-term Brexit is unlikely have a significant impact due to the backlog of housing need. The Plan recognises that some town centres/ parades will contract and allows for this to happen. Town centre action plans will provide greater clarity on the strategy for managed decline, if this is proposed for some centres.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Other			NO need for a new local plan or further new flats/ homes development as the limit has been exceeded. Wembley is over populated, more crowded and noisier than ever!	Noted	No change
Other			Duplicity in the plans. Council wants to build in already reduced green spaces whilst encouraging biodiversity by cutting costs on maintenance of verges, parks, cemeteries and trees. It doesn't want to provide residents services but wants to develop for the sake of developing. It has to stop.	There are no proposals to build on green spaces. The management of open spaces needs to be consistent with funding available which unfortunately is likely to continue to reduce. Where changes in practices which maintain amenity, but also increase bio-diversity can be achieved, it is likely to take place.	No change
Other		Jackie Heavey	Far too much information for residents to digest and understand completely. The deadline was too short. Don't agree with the proposed new dwellings and decimation of area. Prefer quality family houses with gardens for children to play in, not flats everywhere. Densely populated Brent will not have the infrastructure will high levels of population growth and is getting so crowded it will be a really horrible place to live. Please be realistic about discouraging car use, there needs to be sufficient parking too.	The consultation period was considered appropriate. There is not a requirement for flats, these are the most likely response to meeting housing needs given the known availability of land/ sites and requirement in the period of the Plan. If communities can identify suitable alternative sites of sufficient volume, then the type of homes suggested would be possible. It is agreed that there is a difficult balance to be struck between providing for parking and encouraging other modes, particularly to the north of the borough. Realistically however	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				providing for parking will do more to create congestion than limiting its provision with extended parking restrictions in neighbouring streets. This is probably the only way in which existing residents' ownership/ use of the car can be maintained at current levels.	
Other		Christine Harvey	Not enough support services for those on low incomes. Needs an equal balance for those who can pay more to support low incomers	It is recognised that public sector spending restrictions have disproportionately affected those on the lowest incomes. The Plan can assist in some ways, e.g. providing more additional affordable homes, trying to ensure local jobs are for local people, but it will only have a small direct impact on this issue which is related to wider social and fiscal policy.	No change
Other		Sam Balch	Oblige retailers and landlords when refurbishing to remove redundant façade wiring and decaying structures	This can be encouraged, but not required if planning permission is needed. The majority of refurbishment work does not need planning permission.	No change
Other			Waste of time. Focus on fighting crime and remove drug addicts. Run Councils privately instead of dead wood living off taxes.	Policies on the built environment can play a part in dealing with these issues. Similar comments could be made about the efficiencies of many large scale private sector companies.	No change
Other			Document is too big for the average person to read and digest and even	Noted. Balances up the need for brevity, with the need for clarity wherever possible.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			those who care, are educated and have more time on their hands.		
Other			Document way too big for average person to read and digest. Bite-size summary?	A easy read version and summary were provided.	No change
Other			Proposed plan absolutely horrific for all Brent!!! isn't Wembley overcrowded enough as it is????!!!	Noted	No change
Other		Ruth Dar	Tiverton centre still a building site. Maqam building underutilised - no parking and should have no heritage status so tower can be removed to allow greater community usage.	Noted.	No change
Other			Very little concrete detail Kilburn plans	This is reflective of the limited development opportunities that exist, as such radical change will not occur in this area.	No change
Other		Queen's Park Area Residents Association	Applaud this well written and presented document which we support generally. Some aspects could better reflect Queen's Park (QP) area, notably the QP Conservation Area and the interests of residents and QPARA members in particular.	Noted. The conservation area will be subject to heritage asset policies and little change is proposed within this area.	No change
Other		North Brent Parks and Neighbourhood Forum	Very doubtful CIL funding generated will aid a borough already under pressure. Betting shops and Shisha bars reduction is a progressive development but the lack of green space commitment for developments is of great concern. Need protection of sports fields and	It is agreed CIL funding will not cover all infrastructure likely to be required to support additional development/ population. There is a significant green space commitment through the amenity space policies and urban greening factor requirements.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			<p>recreation grounds. Green Flag status needs to be reinstated not short term cost saving, which puts parks in danger of neglect and issues of ASB / misuse. It puts green space at risk particularly without innovative partnership working occurring in Brent. This bottom-up approach is required to address both well-funded projects and underfunding.</p> <p>Appreciate genuine officers dedicated in their field of work who are excellent, under pressure and manage increasingly more varied departments.</p>	<p>The Council seeks to maintain the Green Flag standard, whilst not necessarily applying for accreditation. It is recognised that against a backdrop of reduced resources, but also a need to make parks more relevant to the local population that community involvement in stewardship is desirable to ensure long term success.</p> <p>Noted - thank you.</p>	
Other		Canal & River Trust	Request a section encouraging developers to seek pre-application advice from us and review our Code of Practice for practical advice	This can be added to paragraph 6.6.31 which currently seeks early engagement with the Trust.	Amend Paragraph 6.6.31 final sentence to: "Early engagement with the Canal and River Trust in the form of pre-application advice and review of their Code of Practice for practical advice for schemes adjoining the Grand Union Canal and the Brent Canal Feeder is advised."
Other		Florent Leblanc	Wembley stadium is a source of revenues but also troubles. The Central Place is dirty, more should be done to keep it clean such as using drones to identify the endemic fly tippers.	Noted. There is a very extensive CCTV network in the borough. Enforcement of fly-tipping is taken very seriously with a view to stopping such anti-social behaviour.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Other			Consultation is just something you do to feel right. Your affordable rent in in Wembley for a 2 bed is more than the 3 bed home we currently rent. Don't know for who are you building for but for sure it's not for us.	Noted. The Council will seek to ensure that more genuinely affordable housing is provided. Some intermediate affordable products do however require incomes for those who might otherwise be able to meet their housing needs in the open market. These however will be in the minority of the tenures sought related to creating balanced communities.	No change
Other		Fiona Mulaisho	Welcome consultation plan. Very disappointed no plans to address Kensal Rise (specifically Chamberlayne Road) area's longstanding chronic levels of congestion, very poor air quality and road safety conditions. Problems are caused by over 12,000 diesel buses weekly, plus other commuter traffic. Air pollution around Kensal Rise's schools and residential areas chronically exceeded the EU's legal limits. There have been over 90 collisions on Chamberlayne in the last 5 years. The Kensal Corridor proposals will not lead to a safer, better and cleaner Chamberlayne. The local plan needs to address the endemic problems induced by negligence and inefficient council management.	Noted. Policy BT1 of the Local Plan seeks to increase the uptake of sustainable transport modes including public and active travel with an aim of reducing car dependency and therefore road congestion and associated air quality. Policy BP6, criterion X also looks to enhance cycle links from Kensal Rise which will also assist with this objective. The area will also become part of the Ultra-Low Emissions Zone from 2021. The Council has limited funds and has to prioritise spending where is generates the best overall positive impacts.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Other		Andrew Linnie	Why bother with public consultation? Complete and utter disregard for existing masterplans density and height limits has occurred by planners and committee members. e.g. approving 26 storeys in areas limited to 17 and refusing to discuss the matter at planning committee. Stating facts and allowing member to debate and decide rather than listing off reasons to ignore the local plan would be more equitable. Current system is an insult to local communities, making a mockery of public consultation on these plans and further enshrining bias towards developers in the process.	The concerns highlighted re: tall buildings are understandable. The Plans for Alperton were essentially formulated before 2010. At that time Brent had an annual housing target of 1065 dwellings, whilst its current target in the draft London Plan is 2915. This change in circumstances means that where sites have previously been identified for development, opportunities to increase their development potential need to be considered. Taller buildings than originally envisaged are an outcome of this where they still an acceptable development.	No change
Other		Marin Popa	Cannot continue piling up more people on top of people. Infrastructure doesn't currently cope and will get worse with pollution increasing with decreasing quality of life for existing and new residents.	Priority infrastructure will be identified through the Infrastructure Delivery Plan. Pro-active measures will be used wherever possible in association with new development to reduce adverse impacts on existing residents.	Take forward Infrastructure Delivery Plan and identify priority on-site infrastructure in places or site allocations.

HOUSING TRAJECTORY

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Housing Trajectory	15/5550	Quintain	Plot W03 has approval for 340 units	Noted. See change.	Increased to 340 units.
Housing Trajectory	15/5550	Quintain	Plot W08 will not include residential units	Noted. Remove from trajectory.	W08 removed from trajectory.
Housing Trajectory	15/5550	Quintain	Plots NW09/10 have now been combined the current reserved matters application is for 396 units. The units will be delivered by Q2 2022.	Noted. See change.	Plots combined and proposed total of units inserted to complete by 2022.
Housing Trajectory	15/5550	Quintain	The capacity figure for Plot NW11 is approximately 125 units and are timetabled for delivery between 2028/29 (following the completion of Boxpark's 10 year temporary consent) and are estimated to be ready for occupation by 2030/31	Noted. See change.	Amended plot total to 125 and noted to complete by 2031.
Housing Trajectory	BCSA1	Quintain	Capacity figure should be between 680 - 995 to reflect application 17/3059 to be delivered from Q1 2026 onwards with a 3 year build out programme.	Noted. As greater clarity has been provided on the likely location of the re-provided college and other uses on the Fulton Road site, it is considered appropriate to put the indicative dwellings capacity towards the higher end of the range identified.	Indicative capacity 966 homes.
Housing Trajectory	15/5394	Quintain	The capacity column for Plot NW07/08 should show the delivery of 361 units	Noted. See change.	Amended plot total to 361 units.
Housing Trajectory	18/2197	Quintain	The Prior Approval scheme for York House allows 353 units	Noted. See change.	Amended total units to 353.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Housing Trajectory	BCSA8	Quintain	Plots NE01 and NE02 on site from Q2 2020 and delivered by 2023. Plot NE03 should be shown for delivery circa 18 months after NE01/02. The delivery programme for Plots NE04, NE05 and NE06 should be brought in by 5 years.	The timelines can be amended. Plot NE03 information can be added to the existing line.	Amend information for NE01-NE05.
Housing Trajectory	BCSA11	Quintain	Capacity is 275 units delivered by 2026.	Noted. Will change the document to reflect this.	Amend to 275 dwellings to be completed by 2026.
Housing Trajectory	BEGA1	Quintain	Seek a breakdown of capacity to reflect each site and provide a more certain delivery programme. Phase 1 of the CNWL site could deliver circa 600 homes by Q3 2023 and Phase 2 could deliver a further 600-700 homes by 2026.	This is noted but not considered appropriate to include individually for this site. The Growth Area deals will all the capacity available with a desire for a masterplan approach that looks at the area comprehensively.	No change
Housing Trajectory		OPDC	Information should be provided to clarify how the figures in the Housing Trajectory evidence base document match up with the total housing target figure in policy BH1.	This is background evidence base. The target will reflect the content of the trajectory. The trajectory will be updated on a regular basis, so will soon start to diverge from the policy set in the local plan.	No change
Housing Trajectory		Quintain	Plot E05 capacity needs to be added delivering 458 units by 2020/21	Accepted.	Add E05 capacity figure to the plan.

INTEGRATED IMPACT ASSESSMENT

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
IIA		Environment Agency	Support wording of the objective however indicators could include additional measures for accuracy.	It is agreed that suggested indicators should be included.	Add EN5 potential indicators: "DEFRA Biodiversity calculator for developments and Borough schemes. Mapping exercise every 3-5years of newly created habitat to track efforts of improved landscape connectivity won through development and schemes. River morphology surveys through the Brent Catchment Partnership to qualify the natural state and functioning of the Brent's rivers
IIA		Veenay Chheda	There are more negatives than positives for residents.	Noted.	No change
IIA		Natural England	Brent Reservoir SSSI should be included in the first criterion of EN5 or made into a separate criterion. Recommend that the target for this objective is that development schemes achieve a net gain for biodiversity.	The criteria within the IIA do not require specific reference to individual sites as the required consideration is already captured within the existing criteria, with reference to specific sites serving to duplicate/ confuse analysis. A policy outlining the need to provide a net gain in biodiversity is currently being consulted upon and refined by the GLA for potential inclusion within the new London Plan. Policy BGI2 has also been amended to seek a net	Amend the second EN5 target to "Development schemes within the borough achieve a net gain for biodiversity."

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				gain in biodiversity. As such this change is accepted.	
IIA		Harini Boteju	The Health Impact Assessment should be separate to the IIA. The IIA does not cross-refer green infrastructure with air quality.	Integration of the HIA allows for a more holistic analysis, helping to bring forward potential positives and reduce potential negative impacts in a more joined up way. It is accepted that the objective associated with green infrastructure is not being cross-referenced with air quality/pollution. Nevertheless, the link between the two has been considered within the policy assessment. For instance the commentary on Policy BGI1 identifies "Furthermore, green spaces can assist in capturing CO2 and other pollutants." and "This policy will have a positive impact on the elderly population of the borough through reducing their vulnerability on the impacts of urban heat island and air pollution....".	No change
IIA		Environment Agency	No mention of impact of flooding on impacted communities and rivers in para 8.12. Without improvements impacts will negatively affect ecology and residents. Redundant weirs can also contribute to flooding, with potential removals benefitting ecology. This is also true of the impact of prolonged dry weather considering water quality and fish die off.	Noted. The reference relates to what was included in the Brent Climate Strategy. The impact of flooding on communities is identified in paragraph 8.10.	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
IIA		Elizabeth Gaynor Lloyd	Should have been issued piecemeal to give a chance to comment properly. Regarding the Northwick Park proposal, you cannot swap a piece of MOL for another piece of MOL.	Noted. The MOL land swap will only be accepted once agreed with the GLA after a masterplan has been provided through the One Public Estate. The land swap will enable a more comprehensive redevelopment of the site, including the redevelopment of the pavilion which is currently insufficiently utilised due to placement and design. The reprovision of the MOL will result in no net loss and will hopefully better meet the needs of the surrounding populace.	No change
IIA		Environment Agency	Policies could also seek to achieve the equivalent objective of 'Good' ecological status if we leave the European Union, so that the policy is ready for EU exit into the future.	The Brexit process looks to retain existing EU regulations/ standards in the short term. Any amendments in standards/ assessment methodology would in any case need to be reflected in an updated Catchment Management Plan.	No change
IIA		Kevin Barry	Too complicated and technical in presentation.	The IIA takes into consideration a wide range of variables which are inter-related, which requires a holistic method of analysis. The layout is as coherent as practicable providing the deep levels of analysis which are required, providing a breakdown of the potential policy impacts against a range of criteria which is then colour coded for clarity. The key considerations and findings are summarised in the IIA non-technical summary which	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				provides for easier, more concise reading.	
IIA		Francesca Severn	Brent has less green space than other boroughs, and these should be increased. Road, health and support infrastructure needs to happen before or alongside development, not years later.	Noted. The draft Local Plan policy will be amended to identify specific standards of public open space required. However, given the need to meet population growth through development, large scale provision of additional open space will not occur. The IIA has included criteria which relate to these concerns. Undertaking the IIA involves the analysis of potential policy impact against these criteria, with an aim to choose a policy which maximises the most positive benefits. Developers are obligated to provide the required resources so as to offset the impact of their development, and improve both the public realm and infrastructure capacity. This is done through non-monetary contributions through S106, the details of which will be agreed during the planning phases as is seen appropriate by the Council and through public consultation, and implemented directly by the developer alongside development. They also provide Community Infrastructure Levy (CIL) payments, which are non-negotiable and are spent by the discretion of the Council, through consultation with the public. CIL is not limited to	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				the immediate proximity of the development and is intended to support the infrastructure requirements of the borough as a whole. These projects, by their very nature, are delayed and will only come forward once the necessary funding and associated delivery processes have been finalised.	
IIA		Historic England	The Characterisation Study (in preparation), will be of high value in understanding the impact of, and helping to shape developments. Site allocations: BCSA1, BNWSA1, BSSA17 and BSESA21 have not identified heritage considerations which exist, and should therefore be revised.	Noted. The Characterisation Study is a work in progress, dependent on necessary resource being available for its completion. In relation to the site allocations, it is considered that the sufficient reference has been made to heritage assets, e.g. BCSA1 identifies the need to consider impact on Grade II listed former Brent Town Hall and the adjacent Barn Hill conservation area. Statute requires consideration of these elements in relation to the duty to preserve or enhance their setting and this will occur during either a master planning process or an application where more detailed assessments will be undertaken.	No change
IIA		Grace Brown	You're serious?	Noted.	No change

HISTORIC ENVIRONMENT AND PLACE MAKING STRATEGY

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Historic Environment Place Making Strategy		Elana Gal-Edd	Consider extending the conservation area to the entire Willesden High Road.	The entire length of Willesden High Road is not considered to have enough architectural and historic merit to designate the whole length. It would also dilute the high quality of the existing Willesden Green Conservation Area. However, there are some buildings and groups of buildings which do have architectural interest that may warrant protection and it is proposed to consider these alongside the current proposals for the Willesden Green Conservation Area extensions and local list thematic review.	No change
Historic Environment Place Making Strategy		Wendy Martin	Is concerned about the possible loss of historic buildings in Sudbury Cottages Conservation Area. Thinks that a preservation order should be made on them.	Noted. Full consultation on the de-designation of Sudbury Cottages Conservation Area will be undertaken. This will include the assessment of existing buildings of heritage merit. If the de-designation of the Sudbury Cottages Conservation is confirmed, full protection of the remaining heritage assets will be provided.	No change
Historic Environment Place		Ruth Dar	Member of the Aylestone Park Residents and Tenants Association (APRATA). Strongly supports the proposed extension of the Queen's	Noted. Queen's Park Conservation Area extensions are likely to be given higher priority	No change

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Making Strategy			Park Conservation Area to include Wrentham Ave, Crediton, Dundonald, Okehampton and Tiverton roads. Attractive Edwardian houses that were built as part of the Queen's Park estate and important to Brent's heritage. Currently an Area of Distinctive Residential Character. Logical step to formally include these streets within a Conservation Area.	given public feedback and known development activities in the area.	
Historic Environment Place Making Strategy		Neera Hirani	Suggests the whole area between the train line and the High Road is included in Willesden Green Conservation Area.	Comment shared with Conservation Officer. Changes to conservation area boundaries is subject to a separate statutory process including further consultation in the affected area. This suggestion can be considered when reviewing the existing Willesden Green boundary.	No change
Historic Environment Place Making Strategy		Queen's Park Area Residents Association	Lonsdale Road is an important small business area as well as an eating location between two Conservation Areas. To protect its character and role for businesses could it be incorporated into the Queen's Park Conservation Area?	Merits of the proposed extension noted. Comment has been shared with the Conservation Officer. Amendment of conservation area boundaries is subject to a separate statutory process and there will be further public consultation on detailed proposals within the affected area.	No change
Historic Environment Place Making Strategy		OPDC	The OPDC wants clarity over a description included with an image of Brent Viaduct (page 10). Specifically, to state it is in the	Agreed. This would add clarity over the planning remit of the structure.	Update description in the Historic Environment Place Making Strategy.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
			OPDC planning area of responsibility.		
Historic Environment Place Making Strategy		Historic England	Historic England is the UK government's statutory adviser and a statutory consultee on all aspects of the historic environment. This includes archaeology, historic buildings sites and areas, designated landscapes. It welcomes this document as an important element in the evidence base for the emerging Local Plan. It supports the moves to review, update or produce relevant documentation such as Design Guides and Article 4 Directions; suggesting that the Conservation Area Design Guides for those areas of the Borough undergoing the most significant change should be prioritised.	The support is noted from a key statutory adviser and a statutory consultee on all aspects of the historic environment. A Priority Action Plan is being prepared as part of the final document that will set out a list of priorities pertaining to public feedback and where the largest threat to heritage assets is perceived.	A Priority Action Plan be prepared as part of the final Historic Environment Place Making Strategy.

TALL BUILDING STRATEGY

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
Tall Buildings Strategy		Quintain	A number of comments were raised with regards to the contents of the Tall Buildings Strategy.	Comments responded to in separate document	Changes made to the Tall Buildings Strategy
Tall Buildings Strategy		OPDC	Requesting minor change for increased clarity of OPDC boundary	The Strategy already refers to OPDC's Tall Building Statement and mentions that tall building zones are identified. The suggested sentence will be included in the Strategy.	Update second paragraph of 5.2 to "The Old Oak and Park Royal Development Corporation (OPDC) is the designated local planning authority for Old Oak and Park Royal and this area is not part of Brent's Local Plan or Tall Building Strategy. Areas for tall buildings are envisaged within the OPDC area"
Tall Buildings Strategy		Amafhh Investments Ltd	The consultee points to a proposed tall building cluster nearby, in Barnet and requests increased appropriate heights for the Staples corner Tall Building Zone.	The Strategy describes the search area and its immediate surroundings. We will include reference to the BXC scheme and heights. However, the fact that a super-tall building cluster has been consented east of the railway lines doesn't mean that these heights should be copied for a separate cluster to the west of Edgware Road. We will increase the upper appropriate heights to 15 storeys (45m). The Strategy takes into account the known changes to PTAL up to 2031. Any future improved connections will assist with justification for the area as a	Include the BXC development in the Staples Corner search area analysis.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
				tall building zone. The area to the east, with the highest PTAL, will be the most appropriate location for taller buildings.	
Tall Buildings Strategy		OPDC	Requesting minor change for increased clarity of OPDC boundary	The OPDC area is clearly labelled and depicted on p.7. The OPDC area is not included on the height analysis on the top of p.17. The image below depicts Brent's 'Super Output Areas', which include part of the OPDC area. This reflects the data available and is consistent with the other analysis drawings that cover the whole borough.	No change