

Brent Draft Local Plan - Summary of Consultation – Regulations 18 & 19 March 2020

IN SUPPORT OF THE BRENT DRAFT LOCAL PLAN 2020
PLANNING POLICY TEAM



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Introduction

The Council is working towards adopting a new Local Plan. The Local Plan is a Development Plan Document. All planning applications must be determined in accordance with the Development Plan unless there are significant reasons for not doing so. The Plan is therefore a very important document in shaping the future development of Brent. It runs to 2041, consistent with the London Plan that will be adopted in 2020. The Local Plan will provide a locally specific spatial policy framework for planning and development for the areas of the borough where the council is the local planning authority.

Parts of the borough fall within the local planning authority area of the Old Oak and Park Royal Development Corporation (OPDC) (Fig. 1). OPDC is responsible for writing the Local Plan for its area and 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. OPDC's Local Plan deals with parts of the borough such as Willesden Junction and Park Royal. It is at a more advanced stage than the Council's Local Plan.

Consultation provides an opportunity to help shape the future of the borough. The Local Plan review will:

- Set out a long-term vision and objectives;
- Provide a strategy for significant growth, delivering new homes, employment, facilities and infrastructure to meet the area's and London's needs; and
- Include policies to manage change whilst protecting and enhancing the area's built and natural environment.

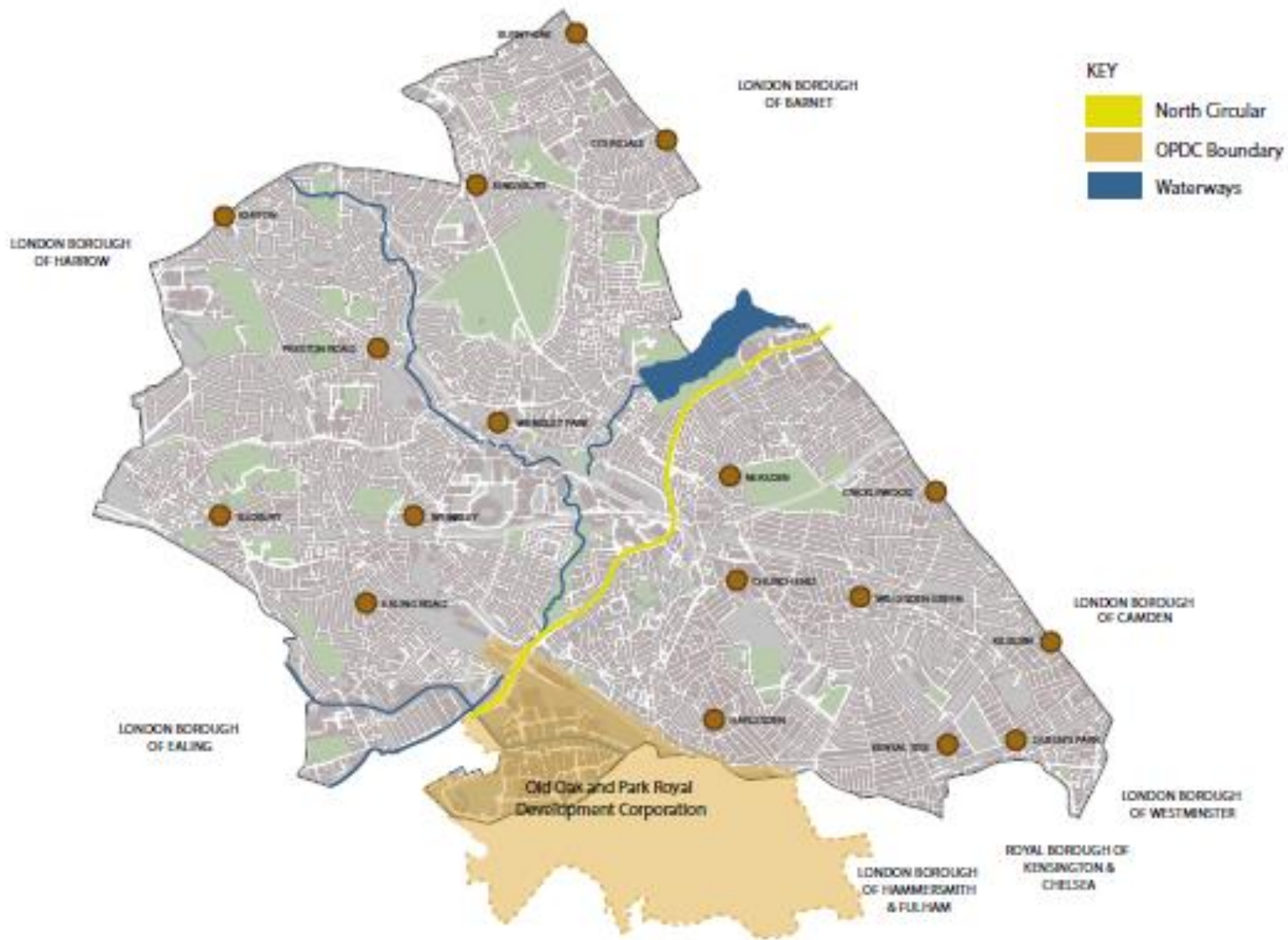


Figure 1: LB Brent Local Planning Authority Boundary and the Old Oak and Park Royal Development Corporation Local Planning Authority Area Boundary.

Regulation 18 Consultation

Issues and Options (stage 1)

A series of workshops/ events took place in August 2017-December 2018 with a variety of stakeholders raising awareness of the need to review the Local Plan and get feedback on the opportunities and challenges that it needed to address. Formal consultation on an Issues and Options document occurred between 8th February and 22nd March 2018. As is suggested in the title, this document identified and sought feedback on the issues which need to be addressed within Brent, and a range of options which would serve to address them. Consultation on this document allowed the council to better understand how residents would like the issues to be addressed, a summary for which can be found in [Appendix 1](#) of this document. A list of those invited to have an input at this stage is set out in [Appendix 2](#). This then informed the production of the Preferred Options stage Local Plan.

Preferred Options (stage 2)

This went out for public consultation from 8th November 2018-3rd January 2019. As the title of the document suggests, this document represents the preferred options informed by the consultation process during the Issues and Options stage. A summary of the responses received can be found in [Appendix 3](#). More detailed comments received on this document, and their subsequent changes can be seen in [Appendix 4](#) where it forms part of the new draft Local Plan Publication Stage consultation process.

Regulation 17(d) of the Town and Country Planning Regulations (2012) require that a Statement of Consultation is produced for a Regulation 18 Local Plan Consultation. The Statement is required to set out the following:

- (i) Which bodies and persons the local planning authority invited to make representations under regulation 18.
- (ii) How those bodies and persons were invited to make representations under regulation 18.
- (iii) A summary of the main issues raised by the representations made pursuant to regulation 18.
- (iv) How any representations made pursuant to regulation 18 have been taken into account.

This information is set out in the Appendices identified above.

Regulation 19 Consultation (stage 3)

This version of the Local Plan is a draft document that the council wishes to adopt. It takes account of comments received to the previous stage of consultation, specifically those received on the Preferred Options document as above. In accordance with the NPPF, the consultation process focuses on the soundness of the Plan. This assesses whether or not the Plan is:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework [the National Planning Policy Framework].

A summary of responses to this document and any resulting proposed changes is set out in [Appendix 5](#). Fuller consideration of the representations received together with proposed modifications to the draft Local Plan is set out in [Appendix 6](#). A fuller list of proposed modifications and the reasoning behind them, and a reference number for each is set out [here](#).

This version of the Plan, along with the proposed changes, is the form in which the Council would like to adopt the new Local Plan. It is for the inspector to decide if this meets the test of soundness as laid out above. It is likely that additional modifications will be required to ensure the document is sound. These will have to be undertaken, as advised by the Inspector, to allow the document to be adopted.

Statement of Community Involvement 2017

The Statement of Community Involvement (SCI) explains how we will involve local communities and other interested parties when we prepare our planning policies and determine planning applications. By engaging the community, the Council benefits from detailed local knowledge and expertise, and community commitment to the future development of the borough.

Brent's Local Plan sets the strategy for future development in the borough. The Local Plan is currently made up of a number of documents. These include:

- **Development Plan Documents** - which set out both strategic and detailed planning policies which will be used when making decisions on planning applications.
- **Neighbourhood Plans** - these are produced by neighbourhood forums with support from the Council. These set out planning policies for a neighbourhood area.

It is supported by other documents such as:

- **Supplementary Planning Documents** – which provide detailed guidance on how our planning policies will be implemented for specific topics.

Both the Council and neighbourhood forums are required to produce consultation statements, which set out how the consultation process followed is consistent with this SCI. It is also recommended developers follow the guidance in the SCI before submitting planning applications.

The SCI outlines the measures which need to be taken when consulting on a Local Plan, helping to ensure adequate community involvement is made. These are set out in Table 1 below. The SCI can be found [here](#).

Table 1: Breakdown of consultation requirements for both Regulation 18 & 19 stages, as laid out within the Statement of Community Involvement (SCI).

Issues & Options/ Preferred Options (Reg. 18)			
Purpose	Required by law	Council's additional commitments	Audience
· To refine the Plan	· Make the draft DPD, Sustainability Appraisal, Consultation Statement and details on how to submit comments, available at Brent Civic Centre, on the website and other locations where appropriate	· Consult those on Local Plan Consultation Database	Specific and general consultation bodies
· To allow informed decision-making	· Consult the general and specific consultation bodies (as identified in appendix 1)	· Where relevant undertake further workshops, exhibitions and drop-in sessions, and attend community events	
· To provide feedback as to how consultation has informed the revised DPD, through the Consultation Statement		· Raise awareness through press release, website, social media, exhibitions and events, as appropriate	All stakeholders - councillors, residents, businesses, local interest groups
Publication Stage (Reg. 19)			
· To allow any person or body to make comments on the draft DPD within a minimum six week consultation period	After publication of the new or revised DPD and before submitting to the Secretary of State (SoS):	· Send details of the consultation to those who commented previously and those on the Local Plan Consultation Database	Specific and general consultation bodies
· To provide feedback as to how consultation has informed the revised DPD, through the Consultation Statement	· Make the revised DPD, Sustainability Appraisal, Consultation Statement and details on how to submit comments, available at Brent Civic Centre, on the website and other locations where appropriate	· Raise awareness through press release, social media, as appropriate	
	· Send details to the general and specific (as identified in appendix 1) consultation bodies on where, when and how the revised DPD can be viewed and how to make comments		All stakeholders - councillors, residents, businesses, local interest groups

A summary of both the Regulation 18 and Regulation 19 stage consultations is outlined below. This is a high-level summary, which only includes the key issues for each associated section of the document. This has been produced to enhance the consultation’s coherence, and ensure it is in line with the Town and Country Planning Regulations. For a more detailed overview of the respective consultations, please refer to the full copies of both the [Regulation 18](#) and [Regulation 19](#) Consultation Statements.

Regulation 18 Summary

Issues & Options (2017/18)	Preferred Options (2018/19)																						
Period																							
<ul style="list-style-type: none"> Drop-in sessions: 07/09/2017 – 09/10/2017 Workshops: 09/09/2017 – 05/12/2017 Document consultation period 8th Feb-22nd March 2018 	<ul style="list-style-type: none"> Document consultation period 6 weeks. 08/11/2018 – 03/01/2019 																						
Outreach																							
<ul style="list-style-type: none"> 5 Drop-in sessions, which allowed members of the public to meet the team and discuss the issues and options in person, as below: <table border="1" data-bbox="161 715 1025 967"> <thead> <tr> <th>Venue</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Brent Civic Centre</td> <td>Thursday 7 September 2017, 11am-3pm</td> </tr> <tr> <td>Kenton Sainsbury’s</td> <td>Monday 11 September 2017, 4.30-8.30pm</td> </tr> <tr> <td>Brent Civic Centre</td> <td>Tuesday 19 September 2017, 11am-3pm</td> </tr> <tr> <td>Sattavis Patidar Centre, Barnhill</td> <td>Wednesday 4 October, 10am-2pm</td> </tr> <tr> <td>Tricycle Theatre</td> <td>Monday 9 October 2017, 5-8.30pm</td> </tr> </tbody> </table> 9 Workshops, where a presentation on the issues and options was provided, with group discussions on how it could be improved, as below: 	Venue	Date	Brent Civic Centre	Thursday 7 September 2017, 11am-3pm	Kenton Sainsbury’s	Monday 11 September 2017, 4.30-8.30pm	Brent Civic Centre	Tuesday 19 September 2017, 11am-3pm	Sattavis Patidar Centre, Barnhill	Wednesday 4 October, 10am-2pm	Tricycle Theatre	Monday 9 October 2017, 5-8.30pm	<ul style="list-style-type: none"> 4 Drop-in sessions, which allowed members of the public to meet the team and discuss the plan in person, as below: <table border="1" data-bbox="1115 695 2083 1040"> <thead> <tr> <th>Venue</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Granville Centre 140 Carlton Vale, NW6 5HE</td> <td>Monday 26 November, 12noon-4pm</td> </tr> <tr> <td>Brent Civic Centre Engineer’s Way, Wembley, HA9 0FJ</td> <td>Tuesday 4 December, 11am-3pm</td> </tr> <tr> <td>Ealing Road Library Coronet Parade, Ealing Road, Wembley, HA0 4BA</td> <td>Monday 17 December, 4-8pm</td> </tr> <tr> <td>Kingsbury Temple Kingsbury Road, London, NW9 8AQ</td> <td>Wednesday 19 December, 4-8pm</td> </tr> </tbody> </table> 4 Workshops, where a presentation on the Plan was provided, with group discussions on how it could be improved, as below: 	Venue	Date	Granville Centre 140 Carlton Vale, NW6 5HE	Monday 26 November, 12noon-4pm	Brent Civic Centre Engineer’s Way, Wembley, HA9 0FJ	Tuesday 4 December, 11am-3pm	Ealing Road Library Coronet Parade, Ealing Road, Wembley, HA0 4BA	Monday 17 December, 4-8pm	Kingsbury Temple Kingsbury Road, London, NW9 8AQ	Wednesday 19 December, 4-8pm
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Issues & Options (2017/18)

Venue	Date
Gladstone Centre, Mapesbury	Saturday 9 September, 10am-12noon
Willesden Green Library	Wednesday 13 September, 7-9pm
Patidar Centre, Wembley Central	Thursday 14 Sept, 7-9pm
Sattavis Patidar Centre, Barnhill	Monday 18 September, 7-9pm
Harlesden Methodist Church	Thursday 21 September, 7-9pm
Kingsbury High School	Saturday 23 September, 9am-12noon
St Andrews Church Hall, Sudbury	Monday 25 September, 7-9pm
Brent Civic Centre	Thursday 16 November, 7-9pm
Willesden Green Library	Tuesday 5 December, 7-9pm

- In addition, targeted workshops and drop in sessions were held with groups that are sometimes underrepresented in consultation events. These included:
 - The Brent Youth Parliament
 - Brent Multi-faith Forum
 - Disability Rights and Politics (DRAP) Brent
 - Parents with young children via Barnardos' children's centres.

Preferred Options (2018/19)

Venue	Date
Brent Civic Centre Engineer's Way, Wembley, HA9 0FJ	Tuesday 20 November, 7-9pm
Bridge Park Leisure Centre Harrow Road, NW10 0RG	Thursday 29 November, 6.30-8.30pm
Kingsbury School Princes Avenue, NW9 9JR	Wednesday 5 December, 6.30-8.30pm
The Library at Willesden Green 95 High Road, Willesden Green, NW10 2SF	Thursday 13 December, 6.30-8.30pm

- A separate developer/landowner workshop, and a 'Youth Parliament' workshop were held, which allowed the respective stakeholders to engage on the Plan.

Methods

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

- Social media - Twitter, Facebook, Yammer using #shapebrent
- Eventbrite
- Leaflets and posters/roller banners in Council Buildings
- Posters in Park Notice Boards
- Exhibition and flyers at Drop in Sessions
- Emailing Local Plan and Community Database
- Emailing Brent Citizen's Panel
- E-newsletter
- Promoting at Brent Connects Events and via BrentConnects mailing list
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent

A communication strategy was produced which informed the consultation process. This was promoted under the brand 'Shape Brent' using the following methods:

- Social media - Twitter, Facebook, Yammer using #ShapeBrent
- Leaflets and posters/roller banners in council buildings
- Posters in Park Notice Boards Exhibition and flyers at Stakeholder Events/ Drop in Sessions
- SmartSurvey Questionnaire.
- Emailing Local Plan and Community Database including list of Statutory Consultees, adjacent boroughs and those people who expressed an interest in being kept informed of the Local Plan
- E-newsletter Promoting via Brent Connects mailing list
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent Main Council webpage and dedicated website
www.brent.gov.uk/shapebrent

Issues & Options (2017/18)		Preferred Options (2018/19)																			
<ul style="list-style-type: none"> Main Council webpage and dedicated website www.brent.gov.uk/shapebrent The Brent Magazine summer and autumn issues Article in Brent & Kilburn Times Elected Members' News bulletin 		<ul style="list-style-type: none"> Promotional Video Every dwelling in the borough received a colour leaflet promoting the consultation document and drop in sessions 																			
Overall Summary of Responses																					
<table border="1"> <tr> <td>Workshop attendance</td> <td>246</td> </tr> <tr> <td>Drop-in attendance</td> <td>230</td> </tr> </table>		Workshop attendance	246	Drop-in attendance	230	<table border="1"> <tr> <td>Total respondents</td> <td>195</td> </tr> <tr> <td>Total comments</td> <td>1303</td> </tr> <tr> <td>Workshop attendance</td> <td>185</td> </tr> <tr> <td>Drop-in attendance</td> <td>120</td> </tr> <tr> <td>Proposed changes</td> <td>316</td> </tr> <tr> <td>Resident comments</td> <td>736</td> </tr> <tr> <td>Organisation comments</td> <td>626</td> </tr> </table>		Total respondents	195	Total comments	1303	Workshop attendance	185	Drop-in attendance	120	Proposed changes	316	Resident comments	736	Organisation comments	626
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Summary of Local Plan – by Places																					
Central																					
<p>The Places did not yet exist at this stage, however, residents were asked what they think gives the area character:</p> <ul style="list-style-type: none"> London Designer Outlet Wembley Stadium Wembley Arena Brent Civic Centre Fountains Wembley Brent Town Hall 		<ul style="list-style-type: none"> 73 comments resulting in 30 proposed modifications Opposition from residents to tall buildings within this Place. Quintain expressed desire to build tall in high PTAL locations also. Residents support new local park in Wembley Park. Developers provided general comments on site heights, capacities, uses, and timeframes. 																			
East																					
<p>The Places did not yet exist at this stage, however, residents were asked what they think gives the area character:</p> <ul style="list-style-type: none"> Sailing and education centre at Welsh Harp Cricklewood Library Cabinet War Rooms Dollis Hill House Gladstone Park Oxgate Farm 		<ul style="list-style-type: none"> 58 comments resulting in 23 proposed modifications. General support for allocation of Neasden Station and Staples Corner Growth Areas, however, residents do not agree with proposed heights at Neasden. Developers see proposed heights as too limiting given potential for transformative change, requesting greater flexibility. 																			

Issues & Options (2017/18)	Preferred Options (2018/19)
<ul style="list-style-type: none"> St. Andrew's Church 	<ul style="list-style-type: none"> Requirement for masterplanning seen to be an obstacle, especially at the College site in Neasden due to immediate plans to move this to Wembley Park. Aggregate Industries concerned over impact upon their activities in adjacent sites, which is now reflected in the allocation. Concern on over-reliance on delivery of WLO. GLA concerned intensification of industrial not possible through co-location. Discussed further to understand how Staples Corner can proceed. Barnet interested in integrating Staples Corner into Brent Cross masterplan Canals and Rivers' trust interested to see how investment at Staples Corner can enhance the Brent Reservoir, with Natural England concerned over impact of heights on migrating birds. EA noted the reservoir breach flooding potential in Neasden Growth Area.
North	
<p>The Places did not yet exist at this stage, however, residents were asked what they think gives the area character:</p> <ul style="list-style-type: none"> Roe Green Village Kingsbury Sikh Temple Ernest Trowbridge Houses Old Dairy 	<ul style="list-style-type: none"> 34 comments resulting in 6 proposed modifications. Residents provided suggestions for improvements within this Place which were taken on board. Residents concerned over proposed Intensification Corridors as heights considered inappropriate, and population increase would put strain on local public transport. Department for Education support reference of new school, however, should be included within site allocation. LB Harrow expressed need for joint heights approach along A5 corridor. GLA state that the Burnt Oak/ Colindale Growth Area should ensure a net increase in employment floorspace. Developer concern of masterplanning requirement due to multiple site ownership. Additional site allocation at Queensbury Station Car Park due to representations made by TfL Commercial Development
North West	
	<ul style="list-style-type: none"> 42 comments resulting in 10 proposed modifications. General support for the Place policy (BP4).

Issues & Options (2017/18)	Preferred Options (2018/19)
	<ul style="list-style-type: none"> Residents concerned about tall building development at Northwick Park impacting upon the Park and views to Harrow on the Hill. Residents support enhancement of biodiversity at Northwick Park MOL. Residents concerned population growth will increase local congestion, and impact upon emergency vehicle passage. Apartments for London proposed a site off the Avenue, near Stanmore Junction which the Council does not consider appropriate.
South	
<p>The Places did not yet exist at this stage, however, residents were asked what they think gives the area character:</p> <ul style="list-style-type: none"> Kensal Green Cemetery Roundwood Youth Centre Jubilee Clock Harlesden Hub @ Harlesden Library Architecture Harlesden High Street Neasden Temple Sufra food bank and kitchen 	<ul style="list-style-type: none"> 64 comments resulting in 30 proposed modifications. Residents support Place policy (BP5), and the greater focus on Church End. Also support need to reduce severance caused by North Circular Road. Neasden Temple stated their desire to provide enhanced facilities on their land. This would require improved public transport through WLO. This is not part of the business case for the WLO currently. Owners of Asiatic Carpets site concerned about need to increase industrial floorspace, and for masterplanning. Concern over need to re-provide play space at the Dudden Hill Community Centre site, the Council has accepted and suggested a modification to policy. EA concerned over development of Wembley Point as within floodplain. Department for education support school on Chancel House site. The Crown Pub (long vacant) has now been included within the Willesden Green Bus Depot allocation.
South East	
<p>The Places did not yet exist at this stage, however, residents were asked what they think gives the area character:</p> <ul style="list-style-type: none"> Lexi cinema Queen's Park Farmers Market Queen's Park Library Queen's Park Police Station building Willemden Green Library Willemden Green Station Prince of Wales Pub 	<ul style="list-style-type: none"> 93 comments resulting in 34 proposed modifications. Significant support for Place policy (BE6) by residents. Some residents concerned about restaurant quarter and support for night-time economies causing disturbance. Concern over impact of tall buildings on conservation areas. GLA concerned over potential loss of open space and at Old Granville Open Space which is a proposed land swap. New Growth Area policy included for South Kilburn Growth Area.

Issues & Options (2017/18)	Preferred Options (2018/19)
<ul style="list-style-type: none"> • Mapesbury Conservation Area • Mapesbury Dell • Tricycle Theatre • Irish history • Kilburn Town Centre • Gaumont State Cinema • Kilburn Market • Kilburn Park Station building • Granville Centre • The Cock Tavern 	
South West	
<p>The Places did not yet exist at this stage, however, residents were asked what they think gives the area character:</p> <ul style="list-style-type: none"> • Vale Farm Sports Ground • East Lane Theatre • Grand Union Canal • Ealing Road • Ealing Road Temple 	<ul style="list-style-type: none"> • 100 comments resulting in 28 proposed modifications. • Residents opposed tall building development. • STRA object to identification of Intensification Corridors, Keelers' Service Centre site allocation, Sudbury Town Station Car Park and any development at Vale Farm. This position was supported by a petition of 537 signatories. The Council consider that the Brent Local Plan policy is consistent with the neighbourhood plan policy of supporting Vale Farm as a regional centre for sporting excellence. • The London Hotel Group supported the principle of site allocation BSWSA10, but sought a greater intensity of development. • GLA stated allocations with existing industrial must be intensified for this use. The Council accepts this point. • CRT welcome retention of site allocations along the canal, which now need to explore the opportunity to deliver boater facility hubs. • Residents require increased permeability across the canal. Partly satisfied by a new bridge as part of the Northfields application. • New Growth Area policy for Alperton included.

Issues & Options (2017/18)

Preferred Options (2018/19)

Summary of Local Plan - by Themes

Design

Options	Tall buildings	Lower buildings
Pros	<ul style="list-style-type: none"> Focusing development in tall buildings means that fewer sites will be needed Appropriate in large growth areas where a new character can be created Young people were more likely to like the appearance of tall buildings and see them as aspirational 	<ul style="list-style-type: none"> All felt these were better at creating opportunities for social interaction and a sense of community You can achieve high densities without building tall Less of an impact on character of area
Cons	<ul style="list-style-type: none"> Perceived as expensive and out of reach for most young people Concerns around safety, with a number of people mentioning Grenfell Tower Some young people associated high rise social housing blocks with anti-social behaviour Concern they don't create a sense of community Disability groups had concerns over accessibility issues, for example the use of lifts in emergencies 	<ul style="list-style-type: none"> Not best use of land, means we need to find more sites

- 54 comments resulting in 15 proposed modifications.
- Comment on the Tall Buildings Policy (BD2) with regards to locations and heights, Intensification Corridors and town centres.
- Developers see the Tall Building Strategy as unsound, being too restrictive. The Council has proposed modifications to some boundaries of the Tall Buildings Zones to cover a wider area.
- CRT and EA request greater green/ blue infrastructure protection from potential harm of taller buildings.

Housing

- Priority locations should be: transport hubs, town centres, employment areas, employment areas (where underused), extensions to Growth Areas.
- Staples Corner suggested as potential new Growth Area.
- There was less support for housing to be delivered in suburbs/ gardens, however, residents felt they should be able to adapt their homes if required.
- Other potential allocations include: land either side of the North Circular, retail parks incl. Matalan, redevelop/ add floors to existing buildings, Council car parks.
- A key priority amongst residents is for genuinely affordable housing.
- Accessible housing was key for disabled groups.
- Additional suggestions include: land identified for Community Land Trusts, reduce buy to let, reduce impact of HMO's, need for larger homes for families, purpose built accommodation for retired people.

- 162 comments resulting in 36 proposed modifications.
- Housing target not in line with London Plan. This represented the number of dwellings in the London Plan that was submitted for Examination. The Intend to Publish London Plan has a lower housing target, which the draft Local Plan will be in conformity with.
- Residents opposed to growth.
- General support for policy BH2, but with requests that high PTAL areas be included also.
- Residents opposed to BtR policy (BH3) as may create a highly transient population.
- Developers generally supportive, however, threshold approach too prescriptive.
- GLA object to small sites policy (BH4) as inconsistent with London Plan policy in removing 800m from stations and town centres from appropriate areas. The Intend to Publish London Plan does not take forward the previous small sites presumption in favour of development policy. This has

Issues & Options (2017/18)	Preferred Options (2018/19)
	<p>resulted in the Council proposing to modify BH4 to fill the gap formerly covered by the draft London Plan.</p> <ul style="list-style-type: none"> • Residents support affordable housing policy, however, believe it could be stronger in providing genuinely affordable products. • Residents generally supporting of housing size mix policy (BH3), however, feel that it could request a higher percentage to address need. • Unite students objected to criterion D and E of policy BH7 which state no more than 20% of the local population can be student accommodation, and that it should be tied to a specific establishment. The Council has proposed a modification to remove the target. • GLA requested identification of specific sites for older persons housing, as opposed to our current threshold approach. St. George suggested affordable housing should be decreased on sites where older persons housing is delivered. • GLA do not believe approach to gypsies and travellers sufficient to address need. • Developers see amenity requirements within BH13 too stringent and of viability concern.
<p>Social Infrastructure</p>	
<ul style="list-style-type: none"> • There is a need for more music venues in Brent. More youth clubs/ youth oriented facilities are needed, especially those which teach skills or develop talent such as music studios • Libraries should be reopened – several have reopened as community run libraries There is a need for more cultural facilities around the new Wembley Park development, e.g. theatre, art gallery, museum etc. • More facilities are needed to encourage mixing of different generations and social groups to promote community cohesion and reduce social isolation. 	<ul style="list-style-type: none"> • 31 comments resulting in 4 proposed modifications. • Residents support retention of facilities, and agree more facilities are needed, and wanted to know how delivery will take place. This is now addressed through the Infrastructure Delivery Plan. • DfE and Brent CCG support inclusion of specific chapter for social infrastructure. • Clarity sought as to how a facility can be assessed as no longer viable. Proposed modifications by the Council seek to address this point.
<p>Economy and Town Centres</p>	
<p>Town Centres:</p> <ul style="list-style-type: none"> • Good range of shops and independent businesses throughout the borough, especially in Harlesden and Willesden Green • The London Designer Outlet in Wembley has a good range of shops and attracts people from outside the borough 	<ul style="list-style-type: none"> • 88 comments resulting in 8 proposed modifications. • GLA and boroughs support policy BE1. • Noted need to identify proposed Cultural Quarters. This is now included on the Policies Map.

Issues & Options (2017/18)	Preferred Options (2018/19)
<ul style="list-style-type: none"> • Opportunities exist to promote parts of Kilburn High Road and Wembley for Night Time Economy activities • High streets need aesthetic improvements to shop fronts and pavements – shops are expanding out onto the pavement • Local independent businesses should be encouraged – open air markets could be set up to facilitate this • Low-value uses such as takeaways, betting shops, payday loan shops and pound shops should be limited • Several high streets including Wembley and Willesden could be shortened to focus on a strong retail core. <p>Other employment</p> <ul style="list-style-type: none"> • Protect existing successful industrial areas and where possible encourage their improved utilisation and/or intensification • Provide greater job opportunities, in particular in white collar industries, high-tech, green technologies and the health sector • Secure new office space, affordable workspace and space for creatives • Focus new workspace in areas with high levels of unemployment • Improve infrastructure to help support blue chip companies • Encourage upskilling of the population, through educational facilities for young people and adults and securing training and apprenticeships as part of new developments through section 106 agreements. 	<ul style="list-style-type: none"> • GLA objected to industrial intensification policy (BE2) considering that it will lead to loss of industrial land, not intensification. Neither do they support co-location on SIL. • Developers object to BE2 as too inflexible, and should include co-location on other sites. • GLA sought the retention of all B2 & B8 uses in policy BE3. • Policy BE4 supported by residents as looks to enhance centre periphery and bring encourage meanwhile uses. • GLA and Quintain believe the ban on new A4/5 uses within primary frontage (BE4) may work against the night time economy policy (BHC4). The Council considers that it has addressed this through the retail assessment and the limited length of primary frontage in town centres. • KFC object to policy BE5 as, in combination with PD rights, is seen to eventually eliminate A5 uses from the high street. Residents support policy. The Council consider this policy is essentially replicating existing Local Plan A5 uses policy which has been supported through examination.
Heritage and Culture	
<p>A key theme was also the need to protect and celebrate Brent’s heritage by:</p> <ul style="list-style-type: none"> • Additional/Extended Conservation Area Designations • Updating the local list • Enhancing and promoting buildings of historical significance, e.g. Churchill’s Bunker and Grange Museum • Restoration works to a number of historic buildings, e.g. Willesden Green Station • Improving shop frontages, particularly within Willesden High Road and Harlesden • Integrating development successfully with existing buildings, which means that consideration should be given to the height and design of nearby properties. 	<ul style="list-style-type: none"> • 56 comments resulting in 5 proposed modifications. • Strong support for the protection/ enhancement of heritage assets, and the designation of new conservation areas. • Also concern over the loss of existing conservation areas. Consideration of the boundaries is part of a separate statutory process, which will allow interested parties to give fuller reasons why areas should be subject to enlargement/ reduction. • General support for protected view corridors (BHC2). Although many felt views already compromised. • OPDC have noted that the view originating from their planning area should only be considered from the boundary.

Issues & Options (2017/18)	Preferred Options (2018/19)
	<ul style="list-style-type: none"> • Quintain are concerned regarding the limitations imposed by views on building heights in Wembley Park. • General support for creative and cultural industries, including policies BHC3-5.
Green Infrastructure and Environment	
<ul style="list-style-type: none"> • Protecting and expanding the borough's green space network. New developments should include tree planting, food growing, green walls • Enhancing the biodiversity within the borough's parks and waterways • Increasing tree coverage within the borough • Making more of Brent's Blue Ribbon network, particularly Welsh Harp • Securing Section 106 money to help with the maintenance of the borough's green spaces • Enhancing the borough's open spaces so that they are more child friendly and safe • Enhancing and improving the affordability of the borough's sports facilities. 	<ul style="list-style-type: none"> • 46 comments resulting in 6 proposed modifications. • General support for policies within this place, including from the GLA, Natural England, and the EA. • Support reference to producing a Green Infrastructure Strategy, and all major developments providing additional green space. • GLA and Natural England suggest reference to a net gain in biodiversity, as opposed to no net loss. The Council accepted this point and made a suggested modification. • GLA suggested Brent produces a locally specific Urban Greening Factor. The Council intends to use the London Plan standard. • Residents would like to understand how trees will be provided, and how their value will be quantified to understand impact of loss. • Policy BGI2 has been amended to provide clarity on how loss of trees can be effectively mitigated.
Sustainable Infrastructure	
<ul style="list-style-type: none"> • Developers questioned whether Energy/ Decentralised Heating was realistic. 	<ul style="list-style-type: none"> • 19 comments resulting in 4 proposed modifications. • DfE concerned about impacts of BREEAM 'Excellent' requirement on viability for school delivery. • Quintain have noted that the delivery of CHP systems may not be feasible, requesting greater flexibility. Policy BSUI1 has been amended to support district heating, rather than CHP. • Support from GLA and residents on air quality policy (BSUI2).A resident suggested greater cohesion between policies within this chapter, and that of the Green Infrastructure chapter. The Council accepted this. • EA support policy BSUI3 on flooding, however, request stronger wording to prevent development in inappropriate areas.

Issues & Options (2017/18)	Preferred Options (2018/19)
	<ul style="list-style-type: none"> CRT have noted that the canal can help mitigate flooding, accepting clean surface water, and its ability to assist in building temperature regulation. This has been taken account of in a proposed modification.
Transport	
<ul style="list-style-type: none"> Restricting polluting vehicles and promoting green technology Promoting a Brent Car Share Scheme Replacing driving to school with walking and cycling Implementing traffic calming and 20mph zones Improving the reliability of bus services through increased frequency and dedicated bus lanes Improving east to west transport links Ensuring transport is accessible to all Addressing the conflict between use of routes for pedestrians and cyclists with dedicated cycling routes Improving pedestrian routes to ensure they are age and dementia friendly. 	<ul style="list-style-type: none"> 77 comments resulting in 10 proposed modifications. Strong support for promotion of active travel and ‘Healthy Streets’ approach, for Cycleways in particular. CRT support need for improvements along the canal, and increased use for freight (BT3). Barnet support requirement for improvements along the A5. Delivery of WLO supported as orbital links need improvement. Support for delivery of step free access at priority stations. Mixed response from residents on car free development (BT2), whereas developers wholly supportive. Concern primarily with regards to perception that it will cause increased on-street parking elsewhere. GLA stated that parking standards for offices and Opportunity Areas inconsistent with London Plan. The Council has made proposed modifications to parking standards for office and business use. Residents requested more orbital bus routes, and increased service.

Regulation 19 Summary

Publication Stage (2019)
Period
<ul style="list-style-type: none"> Document consultation 6 weeks. 24/10/2019 – 05/12/2019
Outreach
<ul style="list-style-type: none"> 6 Drop-in sessions, which allowed members of the public to meet the team and discuss the plan in person, as below:

Publication Stage (2019)

Venue	Date	Time
Kingsbury Library 522 - 524 Kingsbury Road, Kingsbury NW9 9HE	4 November	4pm to 7pm
Ealing Road Library Coronet Parade, Ealing Road, Wembley, HA0 4BA	7 November	4pm to 7pm
Brent Civic Centre Library Engineer's Way, Wembley, HA9 0FJ	11 November	4pm to 7pm
Harlesden Library Plus Craven Park Road, Harlesden NW10 8SE	14 November	4pm to 7pm
Kilburn Library 42 Salusbury Road, Kilburn NW6 6NN	20 November	3pm to 6pm
Willesden Green Library 95 High Road, Willesden Green, NW10 2SF	25 November	4pm to 7pm

Methods

A communication strategy was produced which informed the consultation process. This was promoted under the brand 'Shape Brent' using the following methods:

- Social media - Twitter, Facebook, Yammer using #ShapeBrent
- Leaflets and posters/roller banners in council buildings
- Posters in Park Notice Boards Exhibition and flyers at Stakeholder Events/ Drop in Sessions
- Citizen Space Questionnaire.
- Emailing Local Plan and Community Database including list of Statutory Consultees, adjacent boroughs and those people who expressed an interest in being kept informed of the Local Plan
- E-newsletter Promoting via Brent Connects mailing list
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent Main Council webpage and dedicated website www.brent.gov.uk/shapebrent
- Promotional Video
- Article in 'Your Brent' magazine – publication made available to all residents/ businesses in the borough

Publication Stage (2019)

Overall Summary of Responses

Total respondents	71
Total comments	552
Workshop attendance	N/A
Drop-in attendance	60
Proposed changes	201
Resident comments	135
Organisation comments	417

Summary of Local Plan – by Places

Central

- 45 comments resulting in 26 proposed modifications.
- GLA require the re-provision/ intensification of industrial uses in site allocations. This has been amended where possible.
- TfL Commercial Development request we move town centre boundary to include BCSA7. Not necessary as flexibility due to sites status as 'edge of centre'. Also sought inclusion of sites around Wembley Park station within 'Core' of Tall Building Zone. Not considered appropriate.
- Deletion of SSA BCSA17 as inconsistent with policy BE2.

East

- 35 comments resulting in 13 proposed modifications.
- GLA do not support co-location on SIL on BEGA1 & BEGA2. Not accepted as need to address housing target and encourage industrial intensification.
- Natural England seek mitigation of Staples Corner Growth Area upon Brent Reservoir SSSI.
- Aggregate Industries concerned over impact of Neasden Stations Growth Area upon their site. Greater consideration now included within BEGA1.

North

- 51 comments resulting in 15 proposed modifications.
- Developer concern over masterplanning requirement on sites BNSA1 & BNSA2. Retained as considered necessary for effective delivery.
- Allocated use of BNSA2 questioned as includes retail. Considered appropriate to encourage delivery as existing units trading well.

North West

- 12 comments resulting in 6 proposed modifications.
- GLA do not support MOL land swap at Northwick Park, however, if undertaken should be Plan-led.
- Owners of Ducker Pond site request its inclusion within BNWGA1 for development of leisure uses. This is not supported as the site represents some of Brent's only woodland.

South

- 33 Comments resulting in 6 proposed modifications.

Publication Stage (2019)

- Ikea and Tesco wish for their sites de-designated from SIL as existing use is not industrial. This is not supported as would compromise SIL function and ability to meet 'Provide Capacity' targets.
- GLA object to inclusion of breakers yard in BSSA7. Retained in allocation as needed to bring forward site effectively.
- Environment Agency (EA) concerned about identification of BSSA6 & BSSA7 as within functional floodplain. Retained as met sequential/ exception tests and needed to meet housing target.

South East

- 25 comments resulting in 9 proposed modifications.
- GLA and residents commented on lack of open space in South Kilburn Growth Area. Area subject to adopted masterplan, which has to meet strict affordable housing requirements and therefore cannot be amended to increase open space.
- Opposition to Intensification Corridors due to potential loss of character. Retained to meet long-term housing need sustainably.
- Concern over placement of Place boundaries not reflecting character. Boundary retained as considered appropriate.

South West

- 49 comments resulting in 21 proposed modifications.
- Plan does not provide sufficient guidance to ensure the wholesale improvement of Wembley town centre. The Council do not agree.
- Sudbury Town Residents Association (STRA) do not support the Plan, and have undertaken local survey receiving 319 residents who support Sudbury Neighbourhood Plan, over new Local Plan. Council believe new Plan is not inconsistent with Sudbury Neighbourhood Plan.
- Owners of BSWSA16 object to designation of land to rear as LSIS. Land designated to assist Council in meeting 'Provide Capacity' status.

Summary of Local Plan - by Themes

Design

- 21 comments resulting in 4 proposed modifications.
- General support for Tall Buildings policy (BD2).
- Greater flexibility on heights sought by developers, especially outside of Tall Building Zones.
- Tall building zones do not reflect policy wording and extant permission at Colindale and Alperton respectively. Zones amended accordingly.
- Residents concerned basement policy (BD3) does not provide sufficient protection to neighbouring properties. Not amended as interventions sought are considered to be outside Planning remit.

Housing

- 74 comments resulting in 26 proposed modifications.
- Developers do not agree with adoption of London Plan affordable housing threshold approach as considered unviable. Also to requirement for 100% London Living Rent (LLR) in Build to Rent (BtR) schemes. The latter is not seen to meet the need for genuinely affordable homes, however, LLR can be comparable to Social Rent levels in some parts of the borough. Further viability work has been commissioned to test deliverability.
- Objection to Housing Size Mix policy (BH6) as not supported by London Plan. London Plan policy removed on recommendation of the panel of inspectors.

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- Developers object to BtR policy (BH3) threshold approach, whereby the provision of BtR units is expected on developments of 500 units or more. This is seen to be inflexible, and outside the remit of the Local Plan. This policy is considered appropriate and will ensure faster delivery and help meet residents' needs, who largely rent.
- Innovative Infill do not support Small Sites policy (BH4) as it is restrictive over the previous London Plan policy, reducing its scope to not include presumption in favour of development 800m within a station or town centre. The policy has since been removed from the London Plan. Brent Local Plan policy will be amended to fill the subsequent void left.
- London Gypsies and Travellers feel the plan lacks allocated sites for pitches. Current definitions vary, creating significant variation in need. The Council feels that this uncertainty makes our currently proposed enabling policy the most appropriate course of action.

Social Infrastructure

- 8 comments resulting in 0 proposed modifications.
- GLA state the Council needs to undertake a Social Infrastructure Needs Assessment. The Council consider this is met through a range of assessments, which have been brought together within the IDP.
- Sport England state policy BSI1 does not effectively manage loss, loss of one use to another, or plan for future needs. The policy is seen as sufficient to meet this need in an area where high pressure on land exists.
- Department for Education do not support development requirements imposed on social infrastructure, including need to meet BREEAM 'Excellent', and provide flexible/ adaptable buildings. This is seen as necessary to ensure long-term sustainable use of facilities.

Economy and Town Centres

- 33 comments resulting in 5 proposed modifications.
- GLA do not consider current approach to industrial intensification sufficient in meeting 'Provide Capacity' targets, stating that a borough-wide, plan coordinated approach should be taken. Neither do they support the evidence upon which this method is based, including the Industrial Land Audit, and the West London Employment Land Review.
- GLA do not support co-location on SIL. Council see this as necessary to meet housing targets, and ensure industrial intensification simultaneously.
- IKEA object to identification of their site (part of Wembley SIL) as SIL, and that it has not been identified as an area appropriate for co-location as is currently occupied by retail. This area should be retained for solely industrial to help meet the Council's 'Provide Capacity' target, and ensure a varied supply of industrial uses throughout the borough in key locations.
- GLA also request a more Plan-led approach to delivery of office space, which London Plan states Brent should delivery 44,000 sqm by the end of the Plan period. The Plan provides supportive policies; however, lack of viability reduces ability to allocate additional capacity.
- Numerous comments stating policy BE3 may present a viability issue. Additional viability work has been commissioned to ensure its deliverability alongside other policies within the Plan.
- Residents concerned over the movement of the College of Northwest London (CNWL) from Willesden Green to Wembley Park. The Plan reflects the college's intention to consolidate its existing facilities on to one campus in Wembley Park.
- KFC do not support policy BE5 which seeks to limit take-away uses. This is essentially being taken forward from previously adopted policy.

Publication Stage (2019)

Heritage and Culture

- 15 comments resulting in 6 proposed modifications.
- GLA concerned over loss of pubs, and that policy BHC4 does not sufficiently address this. The current wording is seen as sufficient.
- Historic England have sought more positive wording in relation to archaeological value in the borough. Modifications are proposed to the Plan to better reflect this.
- The Canal and River Trust request the canal's heritage value is acknowledged. This has been accepted.

Green Infrastructure and Natural Environment

- 21 comments resulting in 7 proposed modifications.
- Environment Agency (EA) and Woodland Trust support policies, however, should include reference to key metrics/ guidance documents. Proposed modifications reflect this.
- Woodland Trust would like to see improved standards, including no resident living more than 500m from a woodland of 2ha, and a target of 20% tree canopy cover. Given the urban nature of the borough, this is not considered to be appropriate. Also suggested tree replacement ratios should be set rather than canopy re-provision, which is not accepted.
- Department for Education concerned about need to replace trees on school sites, and associated impacts on viability/ safety. This is not accepted.

Sustainable Infrastructure

- 15 comments resulting in 5 proposed modifications.
- EA and Natural England support policies.
- EA however state BSUI3 is unsound due to proposed development of 'developed functional floodplain'. The Council sees that redevelopment of these sites will result in improvements to their floodplain function. Further clarification has been provided on this through proposed modifications and the requirement to meet sequential/ exceptions tests.
- Developers Quintain and St. George do not support BSUI1. This is seen as necessary to ensure the long-term sustainable development/ function of the borough.

Transport

- 23 comments resulting in 13 proposed modifications.
- Highways England concerned over impacts of growth upon the Strategic Road Network (M1) and have requested a Strategic Transport Assessment. The Mayor's Strategic Transport Modelling Report effectively plans for growth within Brent, and predicts a reduction in trips in accordance with projected growth under London Plan transport policies. Council working with TfL and Highways England to address this matter.
- A resident has suggested additional railway land should be safeguarded for prospective projects. For some sites, this is accepted and proposed modifications made, for others not due to lack of funding/specific scheme for delivery.
- TfL and GLA concerned over parking ratios for industrial uses classes. This has been accepted with proposed modifications. The current split of standards between north and south of the Dudding Hill Freight Line remains appropriate.
- OPDC and Rail Aggregates suggested freight consolidation, and greater protection of rail freight facilities should be included within policy BT3. This has been accepted.

Appendices –

Regulation 18

Appendix 1 [Regulation 18 \(Issues & Options\) Consultation Statement](#)

Appendix 2 [Bodies and persons invited to make representations under regulation 18](#)

Appendix 3 [Regulation 18 \(Preferred Options\) Consultation Statement](#)

Appendix 4 [More detailed responses to the Preferred Options Consultation, officer comments and proposed changes](#)

Regulation 19

Appendix 5 [Regulation 19 \(Publication Stage\) Consultation Statement](#)

Appendix 6 [More detailed responses to the Publication Consultation, officer responses and proposed modifications](#)