

14 - Resident

Submitted to **Local Plan Reg 19**

Submitted on **2019-12-05 16:42:52**

Introduction

15 Do you have any comments to make on the Introduction chapter?

Please ensure that you reference specific paragraphs/ figures:

Paragraphs 2.4 to 2.6: these targets, especially the housing targets, have recently been revised down significantly.

It would be wrong for Brent's new policies to be based on outdated, short-term targets, and it would further exacerbate the effects of any short-term focus such as extreme housing density and a lack of local amenities and green spaces.

Brent should adjust its proposed plans to follow up-to-date guidance.

Brent's Characteristics

16 Do you have any comments to make on the Brent's Characteristics chapter?

Please ensure that you reference specific paragraphs/ figures:

3.13, 15 a) As stated previously, the London Plan targets referred to have recently been revised downward. Brent needs to revise its targets and policy accordingly.

3.16 onwards: the statistics shown on page state that 8.2% (!) of adults have no qualifications; and 57% of adults do not exercise; and 38% of children are obese.

Yet, none of the 'challenges' cited address these severe issues.

3.28) There is no evidence to suggest that 'Improvements are needed for the provision of football pitches and tennis courts.' These are very narrow sports and will not tackle the fact that 57% of Brent residents do not exercise.

Brent has previously established that there is not enough provision for swimming. The previous ('current') policy stipulated building a swimming pool in Kingsbury but this never happened. The demand for swimming and other broader sports has not changed.

Brent needs to consider sports facilities that attract a broad uptake if it wants to solve the prevailing issues it faces.

Development Vision and Good Growth in Brent

17 Development Vision: Achieving our Potential

Development vision matrix of choices - How strongly do you agree/disagree with the development vision:

Strongly Disagree

Please provide feedback on the vision here:

This vision appears to entirely ignore some of the biggest challenges the London and Brent faces: sustainability and climate change (see your own points under 3.29)

Brent must become a sustainable borough. It must proactively tackle climate change and its effects.

'Growth' and 'Sustainability' naturally do not go well together. There certainly appears to be no sustainability in the proposed vision.

18 Good Growth in Brent

good growth matrix of choices - How strongly do you agree/disagree with the vision for Good Growth in Brent?:

Strongly disagree

Is not Positively prepared, Is not Consistent with national/regional policy

For those which have been checked, please state your reasons::

a) Positively prepared - the document highlights some of the big issues facing the Borough and then ignores these in the Vision (e.g. sustainability)

d) Is not Consistent with national/regional policy

National Planning Policy Framework, February 2019, Sections 2, 4, 9, 10, 11, 12, 13, 14, 15 and 16. The vast majority of applicable National Policy appears to have been ignored by Brent's proposed Plan.

19 Policy DMP1 (Development Management General Policy):

DMP1 matrix of choices - How strongly do you agree/disagree with this policy?:

Strongly Disagree

Is not Positively prepared, Is not Effective, Is not Consistent with national/regional policy

For those which have been checked, please state your reasons:

Development typically implies adding strain on existing resources and amenities.

By only '(e) maintaining [...] sites of ecological importance' or striving for '(i) resulting in no loss of [...] community facilities', Policy DMP1 fails to create the necessary ecological spaces and community facilities that are needed to support that Development.

DMP1 therefore is not sustainable. It is not effective by any interpretation and it appears inconsistent with National Policy.

Places

20 Which Place would you like to comment on? (you will get the opportunity to select additional places to comment on throughout the survey)

Please select a place:

North

North Place

24 Please check the boxes of the soundness test which you believe Policy BP3 North does not pass:

Is not Positively prepared, Is not Justified, Is not Effective, Is not Consistent with national/regional policy

For those which have been checked, please state your reasons::

HOMES h) Fryent Way is largely part of Fryent Country Park. Allowing any development along Fryent Way would encroach on the setting of this nature reserve. It would also go against the general aims of the Plan and against the NPPF.

TOWN CENTRES i). Enhance the role and function of Kingsbury as an ethnic food shopping destination goes against the aim of creating mixed and inclusive communities. The existing ethnic food shops predominantly sell food with very high food miles which is entirely unsustainable. Trying to further enhance this would mean actively encouraging having everyday foods flown in from far away locations which is unsustainable and disastrous for the origin communities suffering from the effects of overfarming.

TOWN CENTRES l). Having home owners effectively add floors to their homes evidently does little to solve any housing shortages and no evidence has been provided that would prove otherwise.

25 Please check the boxes of the soundness test which you believe policy BNGA1 Burnt Oak/ Colindale Growth Area does not pass:

For those which have been checked, please state your reasons:

26 Do you consider the site allocations within the North Place sound?

North Place site allocation test of soundness - BNSA1:

Is not Positively prepared, Is not Justified, Is not Effective, Is not Consistent with national/regional policy

North Place site allocation test of soundness - BNSA2:

Is not Positively prepared, Is not Justified, Is not Effective, Is not Consistent with national/regional policy

North Place site allocation test of soundness - BNSA8:

Please state your reasons for those you have checked, being sure to reference the site allocation:: Not sustainable. No regard for impact on wider area.

Fails to consider impacts on nearby SINC sites.

Fails to consider impacts on nearby conservation areas.

Fails to consider impacts on transport.

27 Would you like to comment on another place?

No

Themes

47 Which theme would you like to comment on? (you will get the opportunity to select additional themes to comment on throughout the survey)

Please select a theme::

Delivery and Monitoring

97 Do you have any comments to make on the Delivery and Monitoring chapter?

Please ensure that you reference specific paragraphs/ figures::

Appendices

98 Do you have any comments to make on the Appendices chapter?

Please ensure that you reference specific paragraphs/ figures::

Integrated Impact Assessment

99 Do you have any comments to make on the Integrated Impact Assessment?

Please make sure you reference the section you are commenting on::

Survey Feedback

100 Please provide feedback on the format and content of this survey below:

Feedback on survey:

Fair Processing Statement

101 Would you like for your personal data to be used for reasons other than identifying your representation and for contact in relation to this?

No