

Appendix 3

BRENT LOCAL PLAN PUBLICATION STAGE CONSULTATION RESPONSES



February 2020

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



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Formatting explainer: Throughout the document, in the proposed changes column, the proposed Modifications are generally expressed in the form of ~~strike through~~ for deletions of text and underlined for additions of text.

1 CONSULTATION OVERVIEW

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
1 Consultation overview	Blank Consultation Overview	Andrea Diez	Crown pub in Willesden, Willesden police station both empty and would be better utilised for new flats.	The Crown Pub is included in the BSSA5: Willesden Bus Depot allocation, whilst the former police station is identified as BSESA23: Former Willesden Green Police Station. As such their potential for regeneration has been identified. The police station is currently subject to a planning application.	No Change.
1 Consultation overview	Blank Consultation Overview	Thersa	Plan does not address root causes such as environmental neglect which should be addressed on an on-going basis, not through regeneration. Issues include condition of streets, look of the borough, parks, anti-social behaviour, social isolation, and crime. Regeneration projects are expensive, poorly executed and often unfounded, and do not represent value for money. Regeneration should not be so extensive and frequent. Things should not be allowed to get so bad in the first place and issues should be addressed immediately so as not to become the norm.	The sentiment behind the comment is understood. The Council has worked hard to improve the quality of the management of the local environment. The comment however does not recognise the significant financial restrictions on the Council and other public bodies in relation to the impacts of austerity spending cuts, particularly for revenue budgets. In relation to regeneration projects, it is not considered that more recent projects represent poor value for money, they have reflected a need to deal with fundamental problems that cannot be treated with smaller measures. Schemes such as the regeneration of Stonebridge and South Kilburn have and will continue to clearly positively impact on people's lives by creating significant improvements in housing conditions and the general environment which have reduced actual and perceived impacts of crime and anti-social behaviours.	No Change.

2 INTRODUCTION

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
2 Introduction	Para 2-4	John Cox	(5) Figure 3 is completely unclear and also needs some colouring. Look what other boroughs do, since it is a standard Local Plan graphic. Paragraph 2.3 claims it shows the hierarchy. It doesn't. In paragraph 2.4, change "has" to "have". (Can't you grammar-check the whole document?) Paragraph 2.5 and elsewhere should quote the Consolidated Version of the Draft New London Plan of July 2019. Shouldn't you mention the London Plan Panel's recommendations, particularly on housing numbers? Are all references of London Plan policies in your Local Plan and Appendices compatible with the July 2019 version? Long lists of London Plan policy numbers within individual cells of tables of the Appendices should be in alphabetical order.	5. Noted. It is anticipated that once the document has been adopted, so too will the London Plan, in the adopted version of the Local Plan, the London Plan and its correct policies will be referenced. It is not necessary to keep updating the reference to the latest document when it is so soon to be adopted.	5. Improve clarity of Figure 3, and improve colour scheme. Paragraph 2.4 amend: " has have."
2 introduction	Para 2-18	Thersa	Paragraph 2.18 It is 'evidence-based', not evidence base documents which doesn't make sense.	In the context of what follows, this sentence makes sense.	No Change.
2 introduction	Para 2-22	Thersa	Paragraph 2.22 does not mention Fryent Country Park or other areas. All green spaces should be preserved. Why aren't there any Natura 2000 sites left?	Fryent Country Park does not have a recognised European level designation which is what this sentence is addressing. There are no plans to build on existing parks and open spaces which are protected by policies in the Local Plan and London Plan.	No Change.
2 introduction	Blank Introduction	Mary Duffy	Residents consider the proposed high rise developments inappropriate and do not agree that such development will bring benefits. Residents in Neasden have not expressed support for tall buildings in the Neasden area, it has only been developers.	The need to accommodate additional homes, employment and associated social infrastructure to meet growing population needs will require a more intensive use of land. The Council has sought to positively plan for parts of the borough to accommodate taller buildings in its Tall Buildings' Strategy. In Neasden's case this reflects the size of opportunity that exists and also its high level of public transport accessibility. This will enable a new character area to be established in this location which will reduce in scale towards its edges where it meets lower rise development. Concentrating tall buildings in defined locations will ensure that the majority of Brent remains low rise in character.	No Change.
2 introduction	Blank Introduction	Andrea Diez	Long vacant buildings in Willesden, Kilburn and Neasden should be redeveloped into residential.	Noted. The Council has sought to identify these wherever possible through its allocations policies.	No Change.

3 BRENT'S CHARACTERISTICS

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
3 Brent's Characteristics	Para 3-12	Innovative Infill	Manage potential for evolution of character of some suburban locations which are not designated heritage assets.' This is a welcome approach, but not wholly underpinned by policy later in the document.	The Council considers that the document seeks to manage the evolution of parts of the borough which are considered most appropriate for significant change, whilst giving greater protection to those that have recognised heritage assets, or are not well located in terms of the public transport accessibility.	No Change.
3 Brent's Characteristics	Para 3-16	Resident	None of the 'challenges' cited address the noted problems of obesity, poor education and sedentary lifestyles as stated in paragraph 3.16. 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. The existing policy states that a swimming pool was to be built in Kingsbury which never happened. The demand for this has not changed and should therefore remain within the Plan. Brent needs to consider sports facilities that attract a broad uptake if it wants to solve the prevailing issues it faces.	Criterion c) identifies the need to ensure provision of social infrastructure that will help address obesity, poor education and sedentary lifestyles. For the issues identified in paragraph 3.28 evidence is available in the Council's Indoor Sport and Leisure Facilities Needs Assessment and the Council's Strategic Approach to Playing Pitch Provision document which can be referenced. It is recognised that football and tennis is unlikely to address the majority of the exercise needs of the majority of the population who lead sedentary lifestyles, which is why the Plan seeks to ensure that policies that supports building exercise into everyday life through for example encouraging greater amounts of walking for personal transport needs are supported as much as possible. Policy for the North BP3 currently identifies the need for additional pool provision in the north of the borough.	Amend paragraph 3.28 to identify footnote 17 associated with the text "as with the provision of indoor facilities" Footnote 17 is "Brent Council Indoor Sports and Leisure Facilities Needs Assessment November 2018" Amend paragraph 3.28 to identify footnote 18 associated with the text "the provision of outdoor sports facilities" Footnote 18 is "A Strategic Approach to Playing Provision in Brent December 2016"
3 Brent's Characteristics	Para 3-17	Quintain	Object. Not effective in planning for primary school places. Paragraph states that there is no need for additional places in the short to medium term, however, policy BP1 n) states that a new school will be provided on the York House car park. These two statements are inconsistent. In November 2019 a schools place cabinet report stated that this will be required by September 2023. This should be reflected in the Plan.	This is a fair point and the Plan should be amended to reflect the need for the school on the York House site.	Amend paragraph 3.17 below: ".....medium term. <u>However, to support new residential development, current projections indicate a new primary school will be required in Wembley Park by 2023.</u> "
3 Brent's Characteristics	Para 3-19	Sports England	No reference is made to the Council's Indoor Sport and Leisure Facilities Needs Assessment identifying the need for new and replacement sports hall provision. There should also be reference to the borough's shortfall in outdoor sports provision as highlighted within the Council's Strategic Approach to Playing Pitch Provision document. This will help address desired outcomes set out in paragraph 3.19. Shortfalls identified within the Council's evidence base should also be referenced within paragraph 3.19. Under-provision, alongside swimming pool shortfalls may explain the levels of sports participation and physical activity across the borough.	Reference to the Council's Indoor Sport and Leisure Facilities Needs Assessment and Playing Pitches Assessment findings as identified by Sport England is considered appropriate.	Paragraph 3.19 amend: ".....In terms of indoor sports facilities, <u>the Council's Indoor Sports and Leisure Needs Assessment identified</u> provision is significantly below needs. Swimming pools are between ¼-½ of the provision per head of population in adjacent boroughs. <u>There is also the need for additional sports halls. The Council's Playing Pitch assessment identified that for some sports, additional pitches are required.</u> This under provision is partly reflected by the levels of sports participation and physical activity across the borough."

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3 Brent's Characteristics	Blank Brent's Characteristics	thersa	The Plan acknowledges problems without any account being made as to the Council's responsibility for them. High street decline has resulted in job losses and makes it impossible to acquire goods locally, forcing residents to venture further afield or shop online. This makes things difficult for the elderly and disabled. I can recall having a large offer or multiples in Harlesden which have since disappeared. Unviable shops have been closed due to lack of investment, only to be replaced with shops of lower quality which don't address the needs of the original populations. It seems like an engineered decline. Shops seem to have less regard for their appearance, with too much visual noise, and not enough investment to make them appealing prospects for customers and businesses alike. The poor environment is bad for people's mental health. Why are so many street trees allowed to be cut down given their many benefits?	The Plan provides an overview of changes and challenges to Brent's high streets, identifying the role that higher order centres close by have had and will continue to have on Brent's town centres. Notwithstanding changes that have occurred, Brent still has a significant number of town centres and shops that serve local needs, with the Council through its town centre managers and a variety of functions seeking to maintain or improve the centres. This has included taking enforcement action against properties owners to reduce clutter and improve the appearance of buildings. Whilst many trees have been cut down, this is because either they have reached or are near the end of their life or are causing damage to pavements or property in close proximity which is leading to claims against the Council. The Council is working to remove stumps and replace trees where it can and introduce new trees on streets where there are currently none. This positive work has been recognised in recent awards to the Council.	No Change.
3 Brent's Characteristics	Blank Brent's Characteristics	GLA	Brent's background context is established clearly and concisely and underpins the strategic direction of policies later on in the document. The Mayor welcomes this logical and methodical approach.	Noted.	No Change.

4 DEVELOPMENT VISION AND GOOD GROWTH IN BRENT

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	Vision	Andrea Diez	Willesden, Stonebridge, Kilburn and Neasden require regeneration as buildings remain vacant for too long.	This is recognised in the Plan and where opportunities to regenerate under-used or vacant land exist these have been identified. The complicated nature of these sites which are usually subject to multiple ownerships means that they may in some cases be slower to come forward than desired, however the Council has sought to be realistic in the timescales it has identified for delivery.	No Change.
4 Development Vision and Good Growth in Brent	Vision	Angela Barrett	I don't want more people, Brent is crowded enough. More people = lower standard of living for everyone, more traffic, more waste, more pollution, and the loss of the green spaces we have.	The population of Brent will increase even if additional homes are not built. This has been the case over the last twenty years where population growth has outstripped that which can be explained by additional dwellings alone. This is because larger households who cannot meet their housing needs are effectively occupying properties that are too small for them. Without building new (mostly affordable) homes there is little prospect of these people changing their living conditions for the better. Brent's population profile is such that it will generate a significant number of new residents who will require housing in the future.	No Change.
4 Development Vision and Good Growth in Brent	Vision	Theatres Trust	Support, especially as seeks to provide required cultural assets. These facilities help bring people together and provide opportunity to participate in the arts, contributing to the cultural well-being of residents. They also increase footfall helping to support local businesses. This is required by NPPF paragraph 20.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	Vision	Mary Duffy	Too much weight given to developers. Best improvements are undertaken by residents, including to their own properties, and by community groups and bodies such as the Canal and River Trust, and Natural England.	The Council has to work within the boundaries set by national and London Plan policies. The Council recognises that the best developments are those that grow and are shaped with full and meaningful engagement with the local community. As such it encourages developers to engage early with communities in its statement of community involvement. The better developers, with a long term interest in a site/ area are more likely to undertake this meaningful engagement as it is more likely to pay dividends in the longer term.	No Change.
4 Development Vision and Good Growth in Brent	Vision	Resident	Vision ignores sustainability and climate change which are essential concerns to be addressed. Growth and sustainability are mutually exclusive and the vision does not propose sustainability.	Growth and sustainability need not be mutually exclusive, but are highly reliant on how resources are used and the way wealth is distributed. There is identification under the headings of increasing efficiency and resilience that addresses matters related to climate change. Through its policies and London Plan policies development within the borough is subject to addressing the impacts of climate change to some of the highest standards in the UK.	No Change.
4 Development Vision and Good Growth in Brent	vision	GLA	The Mayor welcomes that his Good Growth Policies have formed the basis for the Local Plan's vision of the borough over the coming fifteen years and beyond. This approach is welcome and aligns well with the draft new London Plan.	Support welcomed.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Stonebridge Real Estate Development	Support principles of good growth and note development should optimise land. Note support for higher density development in Town Centres and areas with good PTAL.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Sports England	New and replacement sporting facilities and pitches are identified in the Council's evidence base work. No reference to shortfalls will not assist in creating a healthy borough. Include a new objective within the creating a healthy borough: "ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough"	It is considered that reference to the proposed objective is suitable as it is something that policies within the Plan actively seek to promote.	Add to Creating a Healthy Borough an additional criterion: " <u>e) ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough</u> ".
4 Development Vision and Good Growth in Brent	Good Growth in Brent	John Cox	(1) The headings of the sections within 4.37 should be numbered as in Figure 5, because it is impossible to quickly refer to a subsection otherwise. So, for instance, "GROWING A GOOD ECONOMY" would change to "4: GROWING A GOOD ECONOMY". Its third sub-section would then be referred to as "4.37 4c". Clumsy, yes, but useable.	1) The point on the numbering of the good growth objectives is accepted.	Good Growth Objectives amend: Number each one consistent with Figure 5

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4 Development Vision and Good Growth in Brent	Good Growth in Brent	John Cox	<p>(2) Using the invented numbering system above, 4.37 1a says “Reduce spatial inequalities” but you should take note of the Consolidated Changes in the Draft New London Plan.</p> <p>In SD10 2.10.2 and 2.10.3 the word “spatial” has been removed, as a result of discussion at the London Plan Examination in Public. It was argued by groups attending the EiP that spatial inequalities can easily be changed by moving wealthy people into poorer areas – but that doesn’t address inequalities and causes of deprivation.</p> <p>You should therefore take the word out.</p> <p>In order for the vision to be sound, a suggested overall change is to say:</p> <p>“4.37 1a) Reduce inequality, disadvantage and causes of deprivation in Brent, particularly around Wembley, Stonebridge, Harlesden, Neasden and South Kilburn.”</p> <p>The “council housing estates” wording should be removed because it encourages replacement of London’s most deprived communities by those who are wealthier. Easily available analysis of “mixed and balanced communities” by Government and LSE (Paul Cheshire) shows no economic benefit to poorer residents and can easily increase day-to-day costs if well-established local shops close down, to service instead the needs of wealthier incomers.</p> <p>When choosing your improved wording for 4.37 1a, you should keep in mind the consolidated changes to 2.10.2 of the Draft New London Plan which state:</p> <p>“In order for regeneration initiatives to contribute to Good Growth it is important that they tackle poverty, disadvantage, inequality and the causes of deprivation, address social, economic and environmental barriers and benefit existing residents and businesses in an area.”</p>	<p>2) Whilst understanding that spatial might have been removed from the London plan in Brent spatial inequalities might not only relate to people but access to services/ facilities/ social infrastructure etc. It is not the Council's intention to 'cleanse' estates or displace deprived people and replace them with those who are not so deprived. Mixed and balanced communities promote better social cohesion and have less adverse indicators than single tenure low income estates in terms of quality of life. London Plan policy on estate renewal in any case essentially puts into place a number of checks and balances that ensure that the existing community is protected in any estate regeneration, including a ballot before regeneration is able to proceed.</p>	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Andrea Diez	<p>Long vacant buildings in Willesden, Kilburn and Neasden should be redeveloped into residential.</p>	<p>This is recognised in the Plan and where opportunities to regenerate under-used or vacant land exist these have been identified. The complicated nature of these sites which are usually subject to multiple ownerships means that they may in some cases be slower to come forward than desired, however the Council has sought to be realistic in the timescales it has identified for delivery.</p>	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Innovative Infill	Plan deviates from DNLP small sites policy and is not sufficiently justified. Support Plans aspirations, however, this deviation may impede achievement of other policy objectives. In the context of a growing city the DNLP argues it is no longer justifiable or equitable that low density Metroland suburbs remain as they are. It recognises that the character of these areas should be allowed to evolve over time to provide new homes. The Plan as is ignores this shift by subtle but potentially effective means, continuing to inhibit delivery within these areas. Increased growth brings benefits to existing and future residents as increased densities help support more infrastructure. The plan compromises broader questions of fairness in where and how change is accommodated. BH1 states that the majority of delivery is to be focused in designated development areas which represents on a small fraction (~12-15%) of the total land area. This means that the residents within these areas must bear the full burden of development and increased densities, whilst those privileged enough to dwell at a density of 12 houses to the acre are insulated from all change. This section of society is largely dominated by private owner-occupiers whereas the former includes greater proportions of renters and residents of HMO's. The evidence base is deficient as neither the Inclusive Growth Strategy, nor the Equalities Impact Assessment identify or justify this embedded inequity.	The Panel recommended the removal of the small sites presumption in favour policy from the London Plan, recognising that its one size fits all approach was not appropriate for a place as diverse as London. The Council considers that its approach of encouraging the majority of development to occur in areas with good accessibility to public transport is the correct one. The alternative is to increase car dependence with its associated impacts on health, air quality and physical infrastructure requirements. Once the priority areas are delivered, then a focus can move towards the next areas of under-used land where public transport interventions and investments can take place, which is more likely to deliver more sustainable development. In relation to the existing stock at lower densities, many of these homes due to Brent's demographic profile are occupied by extended families.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough. This is set out in the responses to representations on BH4.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Angela Barrett	We shouldn't be encouraging more people to live here, it is already overcrowded.	Noted, Brent's population will increase whether new homes are built or not, as the existing population will have more births than deaths. Building homes will assist in reducing overcrowding of existing residents which is already some of the highest in the UK.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Mary Duffy	Housing is required but should not be provided in the form of high rise flats. Strong communities are needed which cannot be achieved through pandering to developers.	To meet housing needs within the timescales identified and meeting London Plan policy requirements on standards of accommodation tall building developments are necessary.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	thersa	Impossible task as too much destruction needs addressing. Brent has wasted millions in recent decades with no lasting benefit providing no confidence in the Plan and therefore cannot justify any more investment. Who will be held accountable if after completion the environment begins to regress again? There is nothing here about accountability.	The majority of development that occurs in the borough will be delivered by private developers. Registered landlords and the Council will play an important part and have in many cases learnt from mistakes of the past related to design or management of development which have undermined their long term sustainability.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Resident	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 policyNational 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.	The sustainability aspects are identified in the good growth policy headings, such as increasing efficiency and resilience. The Brent Local Plan does not seek to reproduce national policy or London Plan policy (as required by national policy). London Plan policy has some of the highest sustainability standards in the country related to carbon reduction, energy efficiency, urban greening, affordable housing provision, etc.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Stonebridge Real Estate Development	It should be made clearer that opportunities for growth can come from an objective of overall regeneration, particularly where there are a number of large scale sites that cumulatively will make a substantial positive impact. Such an area is within Stonebridge Park. The opportunity for increased densities and transformative change in these locations should be recognised. Note support for higher density development in Town Centres and areas with good PTAL. Proposed changes: insert new criterion under 'making the best use of land' emphasising the opportunities and support for regeneration within Growth Areas and Town Centres.	Criteria a) and b) of Making the Best Use of Land plus the Place policies and site allocations give sufficient emphasis to identifying the regeneration opportunities and the intensity of development that will be supported.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Wembley Towers Limited	Support principles of good growth and note development should optimise land. Note support for higher density development in Town Centres and areas with good PTAL.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	Wembley Towers Limited	It should be made clearer that opportunities for growth from an objective of overall regeneration, particularly where there are a number of large scale sites that cumulatively will make a substantial positive impact. Such an area is within Stonebridge Park. The opportunity for increased densities and transformative change in these locations should be recognised. Note support for higher density development in Town Centres and areas with good PTAL. It should be made clearer that opportunities for growth from an objective of overall regeneration, particularly where there are a number of large scale sites that cumulatively will make a substantial positive impact. Such an area is within Stonebridge Park. The opportunity for increased densities and transformative change in these locations should be recognised. Proposed changes: insert new criterion under 'making the best use of land' emphasising the opportunities and support for regeneration within Growth Areas and Town Centres.	Criteria a) and b) of Making the Best Use of Land plus the Place policies and site allocations give sufficient emphasis to identifying the regeneration opportunities and the intensity of development that will be supported.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	CCG	Welcome reference to health and wellbeing in the good growth policies, and throughout the document.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	Good Growth in Brent	TFL Commercial Development	Support principles of good growth, including desire to prioritise development in Growth Areas such as Neasden, Alperton and Wembley. Strongly support high density development in Town Centres and areas with high PTAL.	Support welcomed.	No change.
4 Development Vision and Good Growth in Brent	DMP1	Stonebridge Real Estate Development	Generally support. Should be modified to 'prioritise locations or areas that are well served by public transport.' This will ensure alignment with NPPF paragraph 123 that states where a land shortage exists, it is especially important to avoid homes being built at low densities, especially in accessible locations, and developments should optimise land. This should be reflected in Plans, including the use of minimum density standards for areas well served by public transport.	The prioritisation of higher density development on sites within areas with higher levels of public transport is a main objective of the plan which seeks to minimise development in areas that do not have good access. Nevertheless, providing that development relates to criteria b) and c) in terms of providing sufficient accessibility that does not cause adverse impact, development is likely to be acceptable. Criterion a) allows the Council to consider whether the appropriate intensity of the site is occurring given its location, i.e. proximity to public transport.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
4 Development Vision and Good Growth in Brent	DMP1	Andrea Diez	Long vacant buildings in Willesden, Kilburn and Neasden should be redeveloped into residential.	This is recognised in the Plan and where opportunities to regenerate under-used or vacant land exist these have been identified. The complicated nature of these sites which are usually subject to multiple ownerships means that they may in some cases be slower to come forward than desired, however the Council has sought to be realistic in the timescales it has identified for delivery.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Theatres Trust	Support part i) as ensures protection of community facilities, placing them as a central pillar of the Plan.	Support welcomed.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Resident	Criterion e) only goes so far as 'maintaining' sites of ecological importance and community facilities which fails to create the necessary infrastructure required to support development.	Criterion e) identifies enhancing ecological assets where possible and i) identifies 'where possible enhancing community facilities. Statutory provisions limit the amount of betterment that it is reasonable for the planning system to seek, which has to be fairly related to and proportionate to the impacts of the development proposed.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Environment Agency	We support this Policy, in particular sections g) and h) referring to reducing flood risk and contamination as well as seeking enhancements to blue infrastructure and waterways.	Noted.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	TfL Commercial Development	Generally support and appreciate acknowledgement that 'developments should provide the appropriate sustainable transport infrastructure' as noted within the Council's Consultation Statement. Part c) should ensure that physical and social infrastructure is located within developments in areas well served by public transport.	This policy is a general overarching one and the level of specification suggested in relation to transport infrastructure is not considered appropriate. Criterion b) deals with impacts on the movement network whilst c) identifies the appropriate physical and social infrastructure, these are considered sufficient levels of detail, when taking account of other policies in the Brent Local Plan and the London Plan that seek to reduce trips by non-sustainable means and provide alternatives that support this.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	TfL Commercial Development	'Necessary infrastructure' should be explicit in referring to both existing and planned infrastructure to ensure delivery is optimised on all suitable sites. These changes will ensure compliance with DNLP policy H1 2a.	Necessary is considered broad enough to cover both existing and future infrastructure needs to address the impacts of a development.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Wembley Towers Limited	Generally support. Should be modified to 'prioritise locations or areas that are well served by public transport.' This will ensure alignment with NPPF paragraph 123 that states where a land shortage exists, it is especially important to avoid homes being built at low densities, especially in accessible locations, and developments should optimise land. This should be reflected in Plans, including the use of minimum density standards for areas well served by public transport.	The prioritisation of higher density development on sites within areas with higher levels of public transport is a main objective of the plan which seeks to minimise development in areas that do not have good access. Nevertheless, providing that development relates criteria b) and c) in terms of providing sufficient accessibility that does not cause adverse impact, development is likely to be acceptable. Criterion a) allows the Council to consider whether the appropriate intensity of the site is occurring given its location, i.e. proximity to public transport.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	thersa	DMP1:What is meant by 'high amenity trees'? They are all important and where have they gone? Absence of trees creates harsh and depressing environments.	High amenity trees are essentially those which it would be appropriate to protect through a Tree Preservation Order. As the policy seeks to enhance or provide appropriate additions where possible, the aim is to provide more trees where	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
				existing ones cannot be retained.	
4 Development Vision and Good Growth in Brent	DMP1	thersa	Increasing/ improving green spaces should be a top priority as it is the most important issue facing the world. Brent needs to do more to encourage (enforce) people to reduce their carbon footprint as this is not something which education alone will achieve. Rather than meeting the demands of a growing population, try and tackle the population boom. Building more capacity will only increase the circular problem. Population numbers need to be reduced. Encourage people to have fewer children, ditch their cars, holidays, reduce waste, 24hr lifestyles, consumption of tech, and requirements on energy.	The compatibility of continued population growth and a western lifestyle with sustainable development is a much larger issue than planning can address on its own. The Council is seeking to improve the quality of life of those who are the most deprived.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	thersa	Support aims for health but imagine little progress will be made. Sleep is most important, and is something that our 24hr lifestyles conflict with. Brent noise abatement teams only work limited hours on weeknights making it difficult to get the help required. Nothing is done about noise on the street. This requires greater input from education, increasing consideration.	On noise, policies seek to reduce the creation of noise through development and also occupants' exposure to adjacent noise creators.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	thersa	Need to address disrespect shown to public places via anti-social behaviour/crime. Living in these conditions negatively impacts mental health.	On anti-social behaviour in public places the Council has a cleansing programme and takes action to prevent all manner of anti-social behaviour through on the spot fines or prosecution where it is appropriate.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Mary Duffy	Too much sway is given to developers, who are owned by Asset Managers and offshore funds	The private sector are the largest deliverers of development activity in the borough. The Council writes its policies to be consistent with national planning policy and statutory requirements related to what it is fair and reasonable for developments to be expected to deliver as part of the grant of planning permission.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	thersa	Based on historic efforts, Brent cannot create wide-scale, lasting improvements within the borough. New green space and planting trees, which is relatively low-cost, should be commended. New developments are a waste of money, as those which have already been built are ugly, with poor design, negatively impacting the street scene.	The Council has sought to improve the quality of development and has updated its design guidance in relation to new development in general as well as residential extensions. This recommends for instance limited use of materials that it has been recognised do not appear to weather well, such as some forms of timber cladding and renders.	No Change.
4 Development Vision and Good Growth in Brent	DMP1	Quintain	Point C is not positively prepared to meet needs, nor is it effective or consistent with national policy.	The Council's evidence base indicates that 25% 3 bed homes will meet an evidenced need (much higher), with the percentage deemed to be appropriate taking account of deliverability related to viability and density of developments within the borough.	No Change.
4 Development Vision and Good Growth in Brent	Blank Development Vision and Good Growth in Brent	GLA	A proviso or new policy is required stating that where sites have extant permission, and should new applicants come forward, they will need to consider the new London Plan policies.	The Plan makes suitable reference to the new London Plan policies where relevant, including on employment sites the need to support the borough's designation as a 'provide capacity' borough. The Introduction section will be modified before the Plan is adopted. This can make reference to the need to consider updates to national and London level policy	Within the Introduction section amend to include: " <u>There will be a need to consider updates to national and London level policy and guidance after the Plan is adopted. These might be substantial material considerations that alter the weight that</u>

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				and guidance after the Plan is adopted, indicating that these might be substantial material considerations that alter the weight that can be applied to policies in the Plan when determining planning applications.	<u>can be applied to policies in the Brent Local Plan when determining planning applications. Reference to these will be made in the respective reports associated with the determination of planning applications"</u>

5 PLACES

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5 Places	Maps	OPDC	Waste sites identified in the West London Waste Plan (WLWP) should be shown on the Place diagrams	Agreed, the policies map should include waste sites. The Place Plans provide a high-level overview and the inclusion of more information is likely to make them too busy for such a function. As noted in responses to other representations, the Place Plans will be amended to make reference to clearer boundaries being available on the policies map.	Polices Map amend: Include waste sites as defined in the West London Waste Plan
5 places	Blank Places	GLA	Welcome the approach of dividing the borough up into 7 places. It aligns with Good Growth Policy GG1, which seeks to build strong and inclusive communities through the setting of policies that respond to local circumstance. Through its place policies, Brent should set out its anticipated spatial distribution of growth. This should include indicative capacities in a summary table for residential, office and industrial uses based on the proposed site allocations. This would help to establish whether Brent is capable of meeting identified need over its plan period. If gaps are identified these can then be considered through alternative strategic approaches.	Noted. The Plan has identified sufficient land to meet London Plan housing targets for the period 2019-2029 as outlined in policy BH1. This housing will be directed toward areas as identified within policy BH2. As stated in figure 39, 60% of this capacity is due to come forward in the Growth Areas. The Growth Area policies, and the associated site allocations include their indicative capacities. It is seen that the vast majority of remaining capacity will come forward in the remaining sites which have been prioritised, including site allocations, intensification corridors, town centres and edge of centre sites. This provides a reasonable approximation of the Place capacity with regards to residential, and it would not be appropriate to set further prescriptions in this regard. Industrial floorspace will be intensified as set out within policy BE2 and in accordance with London Plan policy E7. The specific detailing regarding the quantum of industrial intensification for those areas designated appropriate for co-location within policy BE2 will come forward through a masterplan approach. The remaining sites will be intensified in accordance with London Plan policy E7. This is seen as a sufficient response given the potential for uncertainty around the industrial capacity and delivery on small sites. The Council's own evidence base indicates that office development is unlikely to be viable and as such the target identified by the GLA is not regarded as realistic for delivery.	No Change.
5 Places	Blank Places	John Cox	(9) Every Place has an identical and rather useless full page, merely saying "SITE ALLOCATION POLICIES". Instead, and without losing that wording, you need a new page design that mentions the name of the Place, and also shows the title of each Site Allocation in a simple black-text on white-background list.	9. Noted, amend to improve.	9 Improve clarity and presentation of the Site Allocation Policies page for each Place.

5.1 CENTRAL

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.1 Central	Figure 9	Quintain	Noted that Figure 9 (previously figure 8) has been updated but it is unclear due to low resolution. Figure 9 and Figure 30 show two different locations of Wembley Town Centre.	The boundaries of the town centres are shown on the policies map - adding the town centre boundary to Figure 9 and other place diagrams will be considered if this does not result in the place diagrams becoming too busy.	Amend each High Level Place of the Place Vision figure to include town centre boundaries if this does not reduce the effectiveness of the drawing.
5.1 Central	BP1	John Cox	"5.1 CENTRAL PLACE", should mention Wembley Stadium station has very low visibility for routine use, hampered by its location under "White Horse Bridge" and a desire by the borough to improve matters.	Policy BP1 - Central does state that proposals should plan positively to deliver the place vision, contributing and where appropriate delivering a number of objectives, including c) the enhancement of the public realm and stadium approach from Wembley Stadium and Wembley Park stations. This objective includes creating stronger links between Wembley Park and Wembley town centres. Objective u) also refers to consolidating the pedestrian / cycle Wembley Park / Wembley Stadium station route. Both of these objectives would help to raise awareness of the station.	No Change.
5.1 Central	BP1	Environment Agency	Support the policy.	Noted.	No Change.
5.1 Central	BP1	TFL Commercial Development	Town centre boundary should be extended westwards to include the existing Wembley Park Station car park as requested in the representation to the Preferred Options Local Plan. Development of this site under BCSA7 will positively contribute to the vitality and viability of the town centre. It is a restricting policy for the site's development potential of residential led mixed-use which will contribute to regeneration of town centre. This change is necessary if the draft Plan is to be considered positively prepared, justified and consistent with Draft London Plan Policies including H1 Increasing Housing Supply, NPPF Chapter 11 and NPPF paragraph 8.	<p>The council still maintains that based on recommendations within the retail and leisure needs study an extension of the town centre to include the Wembley Station Car Park is not considered appropriate.</p> <p>The council agrees that the site provides a prime opportunity for mixed-use, residential-led development, as per the site allocation policy. However the council disagrees that not extending the town centre boundary to include this site would be restricting for the site's development potential. As an edge of town centre site any proposal involving 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. The fact that the site is located within a growth area and the fact that BCSA7 outlines that the southern part of the site might be suitable for up to ten storeys towards the west indicates that being just outside of the town centre boundary is not restricting development on this site.</p> <p>Should the site incorporate main town centre uses as part of its redevelopment the council can consider this through potentially revising town centre boundaries in the future.</p>	No Change.
5.1 Central	BP1	Quintain	Objection maintained. Part N – Quintain supports the reference to providing a primary school but policy assumes that School will be delivered on York House site. There needs to be a caveat should Department of Education not deliver. Suggested change: "Providing a new primary school on the York House car park site by 2023, subject to child yield projections and school capacity requirements being monitored on an annual basis".	Part N: The current policy wording is considered acceptable in this high level policy. The site allocation policy for York House states that a primary school is required as part of the Wembley Park development once Wembley Park is sufficiently occupied, creating the need for additional school place capacity, and that if the site is not required for the school then alternative suitable provision will be required elsewhere within the Growth Area.	No Change.

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5.1 Central	BP1	Quintain	Objection maintained. Part e – policy does not meet the test of soundness as it is not consistent with NPPF. Intensification supported not only around Wembley Park station but also where PTAL levels are 4 or higher or are predicted to be improved. Text change suggested: “Subject to meeting other policy objectives in this plan intensification and higher residential densities will be supported around Wembley Park Station and surrounding areas where PTAL levels are high or there are proposals to improve them, where it can be demonstrated development would take advantage of the area’s good access to public transport.”	Part E: Clearly as shown through the identification of the Tall Buildings Zone and the indicative capacities on sites the Council has not focussed on high density being appropriate around Wembley Park Station. Amending the policy to remove "station" gives an indication of a wider area of intensification.	Criterion e) amend: "Intensification and higher residential densities will be supported around Wembley Park Station where it can be demonstrated development would take advantage of the area’s good access to public transport."
5.1 Central	BP1	Quintain	Objection maintained. Part L – object to increasing supply of modern affordable workplace unless viability is taken into account. Text suggested: “Where viable, increasing the supply of modern affordable workplace developments for the arts and creative industries.”	Part L: All policies take account of viability in the making of the Plan. Ultimately on mixed use developments if the policy requirements affect viability this is reflected in the affordable housing delivered on site. As with any application where the ability to meet the affordable housing policy cannot be met, the Council will need to balance up a number of competing policy requirements, prioritising those over others.	No Change.
5.1 Central	Para 5-1-25	Quintain	Objection maintained. Re-provision or expansion of current retail warehouse use is not deliverable based on the masterplan redevelopment of Stadium Retail Park. Although the word ‘ideally’ has been included, the text does reflect the current planning application (17/3059)	BCSA2 Site allocation takes account of planning application (17/3059) which Planning Committee has now been minded to approve. 5.1.25 recognises that redevelopment of Stadium Retail Park can enhance Wembley's 'Retail offer'. This is in line with the planning application that offers A1-A4 retail. Furthermore, the paragraph states that 'it and other sites in the town centre' provide the opportunity to reprovide and expand the retail floorspace to address the identified needs by the Retail and Leisure Study 2018. It provides for flexibility and takes account of changes in evidence base that have become available to the Council after the fundamental elements of the current application had been agreed in principle.	No Change.
5.1 Central	Para 5-1-26	Quintain	Metropolitan status supported.	Support welcomed.	No Change.
5.1 Central	Para 5-1-33	Quintain	The text should recognise Troubadour theatre and Boxpark as meanwhile leisure uses that will be replaced by permanent uses in due course.	Agreed, these are meanwhile uses and can be reflected in the text.	Paragraph 5.1.33 amend: "...The provision of Boxpark, Troubadour theatre (<u>meanwhile uses</u>) plus the development of Plot W12"
5.1 Central	BCGA1	Environment Agency	Support the policy.	Noted.	No Change.
5.1 Central	BCGA1	GLA	LB Brent should consider making the Wembley Opportunity Area a sub area in its own right. • Growth and development treated differently than other areas in Brent. • Wembley OA to deliver 14,000 new homes and 13,500 new jobs by 2041. • Define OA boundary on policy map. • Sites distinguished differently from site allocation. • Make clear if Wembley GA corresponds to Wembley OA.	The Council considers that for the purposes of this Local Plan the Wembley Growth Area policy is seeking to deliver the London Plan's Wembley Opportunity Area. It is agreed that this needs to be indicated on the policies map and for the relevant site allocation policies to flag up where the site allocation is located within the Wembley Opportunity Area.	Wembley Growth Area/Opportunity Area to be indicated on the policies map.Site allocation policies (BCSA1-19 and BSWA8-12 and BSWA17) planning considerations to be amended: "The site is located within the <u>Wembley Opportunity Area</u> and as such London Plan policies on Opportunity Areas are applicable."Paragraph 5.1.40 amend: "Wembley Growth Area <u>is the Wembley Opportunity Area</u> , as designated in the London Plan. Its designation as an <u>Opportunity Area</u> means that its growth is of strategic importance to the whole

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					of London. It covers an extensive element of the
5.1 Central	BCSA1	Historic England	Development will have adverse impact on Barn Hill conservation area. It should be referenced in Design Principles and direct towards relevant Historic England guidance.	Policy BP1 (Central) requires proposals to conserve and enhance heritage and cultural assets, including Barn Hill Conservation Area. As such, development on this site will be required to adhere to this policy. The Council's principal conservation officer will give input at detailed planning application stage regarding the appropriateness of any proposed development in terms of its impact in line with Policy BP1. Additionally, in broad terms, the Tall Buildings Strategy considered potential for adverse impacts on conservation areas in its conclusions on recommending appropriate areas, and the acceptable height of buildings reduces closer to the conservation area. Nevertheless, additional mention of the adjacent conservation area would draw this to the attention of the designers of any proposed development.	BCSA1 Design considerations amend: "...to take account of the setting of the opposite Grade 2 Listed former Town Hall, <u>Barn Hill conservation area</u> and not....."
5.1 Central	BCSA1	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Noted. Amend infrastructure section of the policy to make better reference to dialogue with Thames Water.	Infrastructure requirements amend: " Waste water facilities enhancement <u>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.</u> "
5.1 Central	BCSA2	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Noted. Amend infrastructure section of the policy to make better reference to dialogue with Thames Water.	Infrastructure requirements amend: " <u>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.</u> "

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5.1 Central	BCSA2	Quintain	<ul style="list-style-type: none"> • Objection maintained to the requirement to 'replace' existing retail on the site. The policy does not acknowledge the current planning application for the redevelopment of the site which removes the outdated 'retail warehouse' buildings in order to provide a permeable and welcoming pedestrian environment with open space and active frontages, including retail uses. Whilst retail will be provided within the redevelopment, this will be smaller scale and more reflective of modern day retail needs than the current uses. <p>Suggested change: "The existing retail, although is out of town in format and whilst contributing contributes towards retail capacity within a town centre, it does not provide for a welcoming pedestrian environment. As such whilst retail floorspace will be encouraged within redevelopment proposals this should be provided in more appropriate and modern formats given the sites important location within the Wembley Park opportunity area. given the limited opportunities to find new large scale sites to accommodation identified retail needs any development should seek to maximise re-provision of existing floorspace. The opportunity to accommodate convenience retail in particular needs to be considered."</p>	It is considered that the current policy wording is justified, given that the existing site is located within Wembley Park town centre, and given that national planning policy requires main town centre uses to be located within town centres in accordance with the sequential test. The Brent Retail & Leisure Needs Study also recommends that the Council should retain the core retail functions of its major, district and local centres.	No Change.
5.1 Central	BCSA2	Quintain	<ul style="list-style-type: none"> • Object to Fountain Studios (Use Class B1) being referred to as a 'cultural asset'. There is no justification or market demand for the replacement of the studios which were not protected when they were in active use up. Whilst Quintain have now delivered a theatre within the building this is a temporary meanwhile use which will close in 2025. Additional modern cultural assets are planned elsewhere within the Wembley Park masterplan. <p>Suggested change: "The Fountain Studios is a cultural facility, which in the context of Wembley's identification in the London Plan as a Cultural Area of strategic importance, Brent's London Borough of Culture 2020 status and the desire to support the evening economy would ideally be replaced with another cultural facility."</p>	Noted in relation to Fountain Studios. As the principle of the loss of these premises has been agreed through the planning decision on the current application, this will be removed.	BCSA2 Planning considerations amend: " ...The Fountain Studios is a cultural facility, which in the context of Wembley's identification in the London Plan as a Cultural Area of strategic importance, Brent's London Borough of Culture 2020 status and the desire to support the evening economy would ideally be replaced with another cultural facility..... "

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5.1 Central	BCSA3	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity, as part of the planning application process. Move this to the policy's infrastructure requirements for consistency.	<p>Planning considerations amend: “Waste water facilities enhancement 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.”Infrastructure requirements amend: “<u>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.</u>”</p>

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5.1 Central	BCSA4	Dominvs Group	<p>Object to the inclusion within the 'Planning Considerations' section that 'the council will seek no net loss of employment floorspace and if a plot ratio of 0.65 is greater, encourage the maximisation of its provision suitable for B1 (c), B8 and B2 use as a part of any redevelopment of this site'. Justification required why BCSA4 as a non-designated industrial site is expected to provide no-net loss of employment floor space. Just a blanket requirement of 'no net loss' is not acceptable. This is not evident in Preferred Options version, applied to SIL and LSIS sites only, Policy E7 D 2) states mixed use or residential development on Non-Designated Industrial Site should be supported. Proposed allocation of the site to include Hotel due to its location is GA, OA and CA and policy BP1 and BCGA1.</p>	<p>The Council has responded to the representations received from GLA Policy on this matter. Whilst the Council recognised the 'provide capacity' designation in the draft Local Plan previously, it had not fully understood its implications. As the London Plan was at a draft stage, the Council did not give it significant weight as it had objected to the Plan's contents on this matter. Following the Panel's report it is clear that the 'provide capacity' status is considered appropriate for Brent. The GLA in its representation on the Published Plan identified that the Council should provide an additional 43 hectares of industrial land. On the preferred options for this site it identified: "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 capacity and demonstrate that proposals would not compromise the remaining industrial uses surrounding the site in accordance with Draft New London Plan Policy E7." As such the allocation takes account of their representation. Clearly this site has been subject to a previous allocation of which re-provision of SIL type employment uses as set out in Policy E4 B was not a significant part. The Council understands the site owner's concerns, as it too had envisaged a range of uses as set out in the Wembley Area Action Plan when moving forward the allocation in this Plan. The site is an important component of Brent meeting its housing target in the short term as identified in the trajectory. As such the Council recognises that any proposed development ultimately is likely to reflect a balance between a number of competing aims associated with the type of uses anticipated in its Wembley Area Action Plan allocation and what would be sought in the emerging London Plan related to its existing employment use.</p>	<p>BCSA4 indicative capacity amend: "Up to 700 <u>500</u> dwellings.....".BCSA4 timeframe for delivery amend: "0-5 years 200 <u>450</u> 5-10 years 500 <u>50</u>"</p>

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5.1 Central	BCSA4	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan. A critical trunk sewer runs through this site which would need to be considered	Add to Planning considerations the fact that a critical trunk sewer runs through the site. Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity, as part of the planning application process. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ <u>A critical trunk sewer runs through this site which would need to be considered.....</u> ” Planning considerations amend: “ 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. ”Infrastructure requirements amend: “ <u>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.</u> ”

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5.1 Central	BCSA5	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan. A critical trunk sewer runs through this site which would need to be considered	Add to Planning considerations the fact that a critical trunk sewer runs through the site. Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity, as part of the planning application process. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: <u>"A critical trunk sewer runs through this site which would need to be considered....."</u> Planning considerations amend: <u>"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."</u> Infrastructure requirements amend: <u>"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."</u>
5.1 Central	BCSA5	GLA	The site is within Wembley OA and town centre boundary. Under office guidelines in Table A1.1 of London Plan, allocation should reflect office-led mixed-use development.	Noted, the site is allocated for main town centre uses, which includes office development. The site already benefits from planning permission for mixed use development consisting of residential and flexible retail uses (A1, A2, A3, D1, D2) and will be developed for this if not required for the relocation of the College of North West London.	BCSA5 Planning Considerations amend: <u>...potential CNWL/further/higher education campus. Its town centre location also makes it suitable for office-led mixed-use development."</u>
5.1 Central	BCSA6	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity, as part of the planning application process. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: <u>"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."</u> Infrastructure requirements amend: <u>"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</u>

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					<u>essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "
5.1 Central	BCSA6	GLA	Should there be a new planning application, allocation should adhere to London Plan Policy E4, E7 and E1. Proposal for new office space should be directed to town centres.	To provide clarity/ consistency with the London Plan, references in this policy on proposed uses will be amended from employment to industrial.	BCSA6 Indicative Capacity amend: "...plus <u>employment industrial</u> floorspace at ground floor." BCSA6 Planning Considerations amend: "...loss of existing <u>employment industrial</u> land was considered appropriate in the WAAP, Brent's London Plan 'provide capacity' status for <u>employment industrial</u> means that <u>employment industrial</u> floorspace at least on the ground floor of 0.65 plot ratio...."
5.1 Central	BCSA6	Quintain	Objection maintained. The adjacent site to the east (BCSA4) is a redevelopment for residential use and therefore no justification for eastern part of this site allocation to adopt the agent of change principle. This may only effect the north-eastern part of the site which is adjacent to industrial use. suggested change: Development in proximity to the north-eastern part must may need to adopt the 'agent of change'...	Accepted that the adjacent site allocation is principally residential and as such only the north east is likely to remain purely industrial. It is still considered that the policy should refer to the agent of change principle that must be followed in line with the London Plan.	Planning considerations amend: "Development in proximity to the <u>north-eastern part of the site (adjacent to Wembley Business Park)</u> must adopt the 'agent of change..."
5.1 Central	BCSA7	Barratt London and TFL	Design Principles: Generally, those for the south site are appropriate for its context, opportunities and constraints.	General support for design principles of the site allocation is noted.	No Change.
5.1 Central	BCSA7	Barratt London and TFL	Paragraph 2 does not yet fully reflect its tall buildings potential and suitability associated with its Wembley Park Station proximity, associated high PTAL, and surrounding tall buildings. Matthews Close at 10 storeys equivalent does not allow the South site to 'step up' in height towards the Tall Building Zone "Core". Brook Avenue's consistent building height directly conflicts with Policy BD2. Whilst supportive of the text acknowledging potential for tall buildings, removal of "up to" and "slightly directly adjacent" optimises site potential, reflecting the adjacent southern tall building cluster.	The council considers that the Tall Building Strategy and Tall Building Zones provide sufficient scope for upward development. The London Plan supports the identification of areas appropriate for tall buildings, such as clusters. The development of significantly tall buildings outside of these areas will undermine the Council's strategy in consolidating them, whilst retaining the general low-rise character elsewhere. Sites which are appropriate for greater development have been identified as site allocations, are within growth areas, or are within Tall Building Zones. Given the shape and surroundings of the southern part of the site, the council considers that a height of up to ten storeys at the west of the site and a potential stepping up slightly directly adjacent to the station allows for a sufficient stepping up towards the core of the tall building zone. There may be some flexibility adjacent to the station depending on impacts on views and the Barn Hill conservation area from any design.	No Change.

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5.1 Central	BCSA7	Barratt London and TFL	Allocated Use: Support “mixed-use residential-led development”. The requirement to replace the existing office floorspace is unnecessarily prescriptive. This space is ancillary to London Underground train crew accommodation. It is not a standardised B1a office use. Recommend the removal of “to include replacement of the existing office space”.	Accepted. The policy was seeking to be supportive of the replacement of the existing TfL supportive uses, rather than anticipating a provision of general office.	Policy BCSA7 allocated use amend: "Mixed-use residential-led development to include replacement of the existing office space <u>TfL ancillary accommodation</u> "
5.1 Central	BCSA7	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ 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. ” Infrastructure requirements amend: “ <u>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.</u> ”
5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Disagree with addition to allocated use having ‘to include replacement of the existing office space’. This was not included in the Preferred options stage and is unnecessarily prescriptive.	Accepted. The policy was seeking to be supportive of the replacement of the existing TfL supportive uses, rather than anticipating a provision of general office.	No Change.
5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Request that both parts of the site are given separate site allocations as they may come forward separately. Rename southern as: Wembley Park Station car park and northern: Wembley Park Sidings.	It is not considered necessary to split the two sites as separate allocations. The policy provides sufficient clarity on both and removes potential duplication of matters within separate allocation policies.	No Change.
5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Southern: indicative capacity change to circa 450 homes and timeframe of it changed to within 5 years.	Prior to the consideration of an application, on the basis of pre-application discussions the Council considers some rise in capacity appropriate, but not to the 450 as it does have some concerns over heights. As indicated in the Local Plan, indicative capacity is not intended to either be a cap where a development is all other respects is policy compliant. The Council will bring its delivery of south site forward to the first 5 years given that TfL and Barratt appear to be moving towards early submission of a planning application.	Policy BCSA7 Time Frame for Delivery Amend: 0-5 Years " 150 375 " 5-10 years " <u>250 100</u> "

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5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Opportunity for taller building especially on eastern part supported by massing strategy of increasing scale towards the station and Wembley masterplan (east) and the sympathetic stepping down of height towards the street (south). It will serve as a way-finder building as it is adjacent to transport hub, edge of town centre and surrounded by taller buildings in close proximity (premier Inn - 11 storey). The design principles fail to reflect the development aspirations of the borough, the GLA and TfL CD for the site. Therefore: remove 'slightly' and 'directly' from design principles.	Taking account of the Tall Buildings Strategy, given the shape and surroundings of the southern part of the site, the council considers that a height of up to ten storeys at the west of the site and a potential stepping up slightly directly adjacent to the station allows for a sufficient stepping up towards the core of the tall building zone. There may be some flexibility adjacent to the station depending on impacts on views and the Barn Hill conservation area from any design.	No Change.
5.1 Central	BCSA7	TFL Commercial Development	Allocation is supported. However: Ground floor activity may be residential (with front doors) therefore clarity required on 'Active frontage' along Brook Avenue to explicitly acknowledge the likelihood of use to be residential. For this reason, request to include in Wembley Park Town centre boundary.	The council does not consider it necessary to specify the type of active frontage on Brook Avenue at this time. Active frontage does not preclude residential where there is likelihood of interaction with the street.	No Change.
5.1 Central	BCSA7	TfL Commercial Development	<ul style="list-style-type: none"> • Wording of height to be more flexible to ensure optimization of site and reflect wider context. Consultation statement Policy is very restrictive. • Indicative capacity should be significantly increase from 100 dwellings which is equivalent to 142 dwellings per hectare. • Site requires significant infrastructure works. For development to be viable, a higher capacity is required. 	It is agreed that the development on the other side of the sidings is 8 storeys, which provides the backdrop to the site when viewed from the north. The Tall Buildings Strategy seeks a stepping down of tall buildings towards areas of lower rise character. Forty Avenue is seen as an intensification corridor where up to 5 storeys is likely to be appropriate. On reflection, there may be some potential for the development to mediate between the taller buildings south of the railway and Forty Avenue and go taller than 5 storeys. There are sensitive receptors in close proximity to the site such as adjacent nursing home and the school, so the design would need to take account of these when producing a suitable height/ massing. This would be considered at detailed application stage. As such the indicative capacity is considered appropriate in advance of a detailed design bearing in mind that the site is also currently SINC and will need effective mitigation to off-set biodiversity impacts on site.	Policy BCSA7 Design Principles amend: " Buildings may step up to four or five storeys heights should mediate between the taller buildings on <u>Matthews Close and the character of development along Forty Avenue and further to the north</u> , however the northern site is not suitable for tall buildings of a significant scale."
5.1 Central	BCSA8	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: " 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. " Infrastructure requirements amend: " <u>H192</u> "

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5.1 Central	BCSA8	Quintain	Officers comments noted to bring forward the North East Lands. Additional units could be deliverable within the site whilst respecting and enhancing the setting of the new park.	Noted.	No Change.
5.1 Central	BCSA9	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: " 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. " Infrastructure requirements amend: " <u>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.</u> "
5.1 Central	BCSA9	GLA	<ul style="list-style-type: none"> • Brent should apply principle of no-net loss of industrial floor space capacity through intensification or co-location in line with London Plan Policy E4 and E7. • Brent should increase industrial floor space capacity on these sites beyond re-provide. Residential use should provide at least 50% affordable. • Residential development in close proximity to industrial use and adjacent to Wembley stadium need to apply 'agent of change' principle (London Plan Policy D12) 	The sites have previously been removed from SIL and allocated in the WAAP principally for residential use. Whilst some are still in industrial use, they are anticipated to contribute significantly to Brent's housing trajectory. The GLA needs to be realistic about what can be achieved on these sites that have previously been allocated as part of planned wider community and also previously identified housing provision assumed in the SHLAA which informed Brent's housing target but did not sufficiently take account of the 'provide capacity' policy requirement. The current policy approach is considered appropriate balancing the need to recognise the long term allocation of the sites, with the need to address the provide capacity designation of the borough.	BCSA9 Allocated Use amend: " <u>Residential-led mixed-use development, including student accommodation/education and business industrial.</u> " BCSA9 Planning Considerations amend: .. "It still contains numerous occupied business-industrial premises....." and ... maximum re-provision of business industrial uses....." BCSA9 Design Principles amend: ... Where business industrial premises are being provided on-site, the design should support the amenity of both residential and business industrial uses....." BCSA9 Justification amend: ... potentially accommodate business industrial premises...."

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5.1 Central	BCSA10	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ Waste water facilities enhancement 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.” Infrastructure requirements amend: “ <u>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.</u> ”
5.1 Central	BCSA11	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Noted. Amend infrastructure section of the policy to make better reference to dialogue with Thames Water.	Infrastructure requirements amend: “ <u>...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.</u> ”
5.1 Central	BCSA11	Quintain	Whilst the figure has increased from 100 to 155 dwellings it still does not meet the site's potential. The comparison of the site's potential density to BCSA5 (Olympic Office Centre) is not appropriate for site BCSA11 (CNWL). BCSA11 has the highest PTAL rating of 6a whereas BCSA5 has a PTAL rating of 4/5. the site is a gateway that can maximise densities in accordance to the London Plan, Policy BP1(e) or Policy D6 of Reg18. Suggested amendment to 275 dwellings	The site capacity stated in the Local Plan is indicative only, based on the circumstances of the site and Brent's Tall Building Strategy. A well-designed scheme may be able to provide a higher density than indicated but must adhere to other relevant policies in the Local Plan and the design principles outlined in the policy (including stepping down towards the west of the site, design being sensitive to protected views of the stadium, and active frontages at ground level).	No Change.

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5.1 Central	BCSA12	Thames water	Scale of development requires upgrade to wastewater network. Thames Water need to be engaged at the earliest to agree a housing and infrastructure phasing plan.	Planning considerations takes into account Thames Water comments from previous consultation and has mentioned engagement with Thames Water at the earliest opportunity. Move this to the policy's infrastructure requirements for consistency.	Planning considerations amend: “ 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. ”Infrastructure requirements amend: “ <u>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.</u> ”
5.1 Central	BCSA19	TfL Commercial Development	Site allocation of Wembley Park Bridge Road: • Indicative capacity is too low and suggested change from 60 dwellings to 150-200 units.	The capacity identified would require a tall building outside what is the defined Tall Buildings Zone. At this stage whilst the Council would be comfortable with a mid-rise development within this location, in the absence of a more detailed proposal it is not comfortable with height of building that is likely to be assumed by TfL. The policy justification for BD2 indicates potential flexibility where there is good reason to accommodate taller buildings outside zones. This is the approach that is considered best on this site.	No Change.
5.1 Central	BCSA19	TfL Commercial Development	Site allocation of Wembley Park Bridge Road: • The site allocation currently states that the site is 0.3ha. The accurate area of this site is 0.34 hectares.	Amend site area to 0.34 ha.	BSCSA19 site area amend: "0.34"

5.2 EAST

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5.2 East	Para 5-2-14	Quintain	It is noted that the Regulation 19 version now refers to a tall building as 10 storeys or more instead of 12 storeys. No comments have been provided by officers to explain this change.	The preferred options reference in this paragraph was to buildings over 6 storeys. The revision provides greater clarity on the predominant likely scale over which tall buildings will go in the Growth Areas.	No Change.
5.2 East	Para 5-2-16	Quintain	The masterplanning process should include key stakeholders, landowners and developers to help shape the plan from conception to completion, through workshops and consultations. This will ensure the plan is effective and deliverable.	Agreed. The best masterplans are those that seek to engage with a wide variety of people and seek their positive input. This can be highlighted in the paragraph.	Amend Paragraph 5.2.16: "...A masterplanning exercise will be undertaken <u>involving key stakeholders, landowners and developers to help shape the masterplan from conception to completion.</u> This will to identify the appropriate mix of uses and form of development with a view to improving employment opportunities as well as homes.
5.2 East	BP2	TfL Commercial Development	Support Neasden Stations Growth Area and the provision for tall buildings within. Support addition of Neasden Town Centre to BP2 criterion c). Criterion d) limits building heights to no more than 2 storeys above prevailing heights which is unnecessarily restrictive, inhibiting potentially appropriate development considering requirements within DNLP policy D1B. This should be made more flexible, being considered on a case by case basis via a design-led approach.	Criterion d) takes account of the Policy BD2 Tall Buildings which identifies the principal locations for tall buildings, which the London Plan indicates should be Plan led. Criterion d) identifies heights should 'typically' go no higher than 2 storeys above the prevailing predominant heights. This, together with the exceptions in policy BD2 together with its justification should give sufficient flexibility for in justified scenarios for there to be exceptions.	No Change.
5.2 East	BP2	Amafhh Investment Limited	An opportunity has been lost to promote a wider range of uses as part of the transformation of Staples Corner (in addition to "new business premises fit for modern day occupiers in association with a new mixed-use community") and, more specifically, in recognition of the changing strategic importance of the area and the opportunities provided by the provision of the new railway station.	The Growth Area allocation takes account of the need to address the London Plan's provide capacity borough status for industrial intensification. The need to accommodate the London Plan industrial requirements will in itself generate large floorspace needs. The Council and the GLA are working together to consider the extent to which the mix of uses sought in the policy whilst being London Plan compliant can be delivered. The Growth Area policy is not anticipating any dwellings being delivered in the first 10 years of the Plan. As such there might be scope within a future review of the Local Plan to identify a wider range of opportunities (or indeed fewer opportunities resulting from the intensification of existing SIL designated land.	No Change.
5.2 East	BP2	GLA	Staples corner is Sil and should not be considered for residential unless industrial intensification can enable some SIL release without net loss of industrial capacity, in line with DNLP policy E7. This would need to be established prior to SIL release. As Brent is a Provide Capacity borough it should seek to intensify industrial uses within SIL. Criterion m) requires more clarity so that it is clear intensification applies to B1c, B2, and B8 only (where priority is given to B2 and B8). Part n) should be removed as SIL is not suitable for co-location as identified by DNLP policy E7, unless SIL is released as mentioned above.	The issue of the need to intensify industrial uses on site is understood and is what the Council will seek to achieve. Agreed the policy can be amended to B1c, B2 and B8. There is no specific requirement in the London Plan for priority to be given to B2 and B8. The Council seeks some flexibility on SIL on this site for co-location.	Amend BP2 to: "m) Retaining and encouraging intensification of employment B1c, B2 and B8 industrial uses at Kingsbury Locally Significant Industrial Site.

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5.2 East	BP2	Quintain	Support revised wording in conjunction with Tall Building Strategy. This now forms a positive and proactive framework to ensure the Neasden Growth Area can deliver identified targets. Precise heights will be derived from further design work and masterplanning.	Support welcomed.	No Change.
5.2 East	BP2	Mary Duffy	Thames Water have indicated that the water network capacity in the Coombe Road site may be unable to support demand from this development, with upgrades likely being required. These sewers already flood into the canal between Braemar Avenue and McDonalds on Coombe Road every time there is heavy rain; and despite calls to both Thames Water and the Canal and River Trust nothing has been done.	The site allocation makes reference to the need to address waste water through development proposals. Operational issues related to sewers are for Thames Water to address.	No Change.
5.2 East	BP2	Aggregate Industries UK Ltd	Aggregates Industrials UK depot at Wembley is long established and meets a vital need for the sustainable important of aggregate, asphalt, and ready mixed concrete into London and should therefore be safeguarded. The NPPF states that existing, planned and potential sites for the bulk transport, handling and processing of minerals, concrete and aggregates should be safeguarded. In addition, NPPF states that planning policies should ensure new development can be integrated with existing facilities, and that they should not have unreasonable restrictions placed on them as a result of development permitted after they were established. DNLP policy Si10 states that development plans should ensure sufficient capacity of aggregate rail depots is available and where practicable expand capacity adjacent to rail depots adjacent to major construction projects. Therefore additional text should be inserted into the policy as follows : (u) Ensure the adjacent existing rail aggregate depot is safeguarded and new development provides “agent of change” mitigation if required.	It is recognised that the aggregates operation provides an important function. The representor has also responded to policy BEGA1 with essentially the same representation. The Council considered that a modification to that policy to take account of the issues raised was appropriate. As such it is not considered necessary to amend policy BP2.	A modification to BEGA1 has been proposed, as such No Change. to BP2 is proposed.

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5.2 East	BEGA1	GLA	The sites to the west and North are SIL, and the ones to the south LSIS. Such designations should feature on site plans. The approach to industrial land intensification as outlined within DNLP policy E7 should be followed for both SIL and LSIS. Co-location is not considered acceptable on SIL. As Brent is a Provide Capacity it should intensify industrial on SIL.	The industrial designations are on the policies map. The Council has amended the policies map to change the SIL element to LSIS to reflect the potential that the site offers in relation to a significant intensification of use given its proximity to the existing Neasden station and the potential WLO where PTAL will be very high and that therefore justify higher densities/an efficient use of land. The part of the site that was formerly SIL has no functional link to the wider Wembley SIL being split from it by a railway line and has the same characteristics as the LSIS on the opposite side of Neasden Lane. The Council is still planning to intensify the industrial floorspace provided on site to be London Plan compliant.	Amend BEGA1 Allocated Use to: "Growth Area - Strategic Industrial Location and Locally Significant Industrial Sites subject...." Amend BEGA1 Description of Site to: "The site comprises Strategic Industrial Location and Locally Significant Industrial Sites....." Amend BEGA1 Planning Considerations to: "A significant part of the site is Strategic Industrial Land/ Locally Significant Industrial Site....." and "0.65 for the current SIL and LSIS sites useable employment floorspace....." Amend BEGA1 Planning Considerations to: "Apart from the railway corridors <u>which are Sites of Importance for Nature Conservation (SINC)</u> , there is very little of ecological value...."
5.2 East	BEGA1	John Cox	The rear of the buildings along the western side of Neasden town centre and those in Birse Crescent are potentially the worst views in Brent, and are seen by everyone travelling east on the North Circular. A coherent, long-term strategy for improving this area needs to be devised which should be driven by development & environmental improvements. This should be reflected in the East Place section. Although land assembly may be an issue, providing a plan for the area should help attract investment, helping increase the social benefits of planning.	The poor character of this area is recognised. These areas were subject to allocations in the 2011 Plan, nevertheless there had been no interest shown in their development, so they have been removed as allocations. One is now identified as part of an intensification corridor, whilst the other sits outside the town centre boundary. The Council is considering options for these sites as part of an overall review of the potential Neasden town centre. As identified land ownerships and viability are likely to be issues in bringing the sites forward, not assisted by proximity to the North Circular, with its environmental challenges. The current lack of allocations is unlikely to significantly affect any potential redevelopment if it proves viable given the supportive framework provided by the Plan to intensification of sites in, or on the edge of town centres and intensification corridors.	No change.
5.2 East	BEGA1	GLA	A large part of the site lies within the Wembley OA which should be clearly defined. Part is also a SINC which should be identified, and DNLP G6 applied.	It is agreed that the Council needs to indicate the Wembley Opportunity Area on the Brent Policies Map. This is considered to be contiguous with the Wembley Growth Area as identified in the Brent Local Plan. It is agreed that part of the site is within a SINC which needs to be recognised in the policy.	Amend text to identify Wembley Opportunity Area is contiguous with the Wembley Growth area boundary.

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5.2 East	BEGA1	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	This has been adequately addressed in the infrastructure requirements.	No Change.
5.2 East	BEGA1	TfL Commercial Development	Support inclusion of Neasden Station Car park within growth area. Unlike other sites within BEGA1, this site has no industrial land designations. Therefore the allocation should support this site coming forward for residential development. Brent being a 'Provide Capacity' borough should not preclude such development. Having a clear strategy for industrial intensification should allow such development through co-location with residential. DNLP policy E4 paragraph 6.4.5 states that no net loss does not apply to sites previously used for land for transport functions which are no longer required. The significantly increased housing target set by the mayor should ensure every opportunity for the optimisation of appropriate sites for residential, whilst also meeting 'provide capacity' targets should be taken. The existing industrial locations within this site are deemed more suitable for additional industrial capacity given their current uses and designations, allowing the car park to be allocated for residential. This site could provide approximately 70 new homes in line with DNLP policy H1 and NPPF chapter 11.	Support for the allocation is welcomed. As the site is not identified as SIL or LSIS in the existing Local Plan, or in the draft, the principle that no net loss of industrial capacity does not apply to sites previously used for land for transport functions which are no longer required does not apply as would be the case set out in 6.4.8 of the London Plan. Nevertheless, as Brent is a provide capacity it needs to be able to identify additional industrial capacity where the opportunity arises. The point of identifying BEGA1 and seeking masterplanning is that a wider review is taken of the area and it is planned to make the best use of its potential which means sites currently used for one purpose might be appropriate for a new set of purposes.	No Change.
5.2 East	BEGA1	Quintain	Object. The allocation covers a wide and diverse area with different land ownerships and aspirations. Whilst a masterplan may cover the whole area, the allocation should be split into several allocations to enable a more site specific focus, and provide greater clarity on timescales. The masterplan should also include the involvement of all stakeholders, from conception to completion through a series of workshops.	The Council has appointed a person who will start work on the masterplan soon. This should progress to such an extent that it should not unreasonably delay considerations of applications for sites that potentially could come forward early, such as the college site. Reference to engagement in association with the masterplanning process is considered appropriate.	Add to BEGA1 Planning Considerations: "...in the area. <u>The masterplanning exercise will be undertaken involving key stakeholders, landowners and developers to help shape its content from conception to completion.</u> "

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5.2 East	BEGA1	Aggregate Industries UK Ltd	Aggregates Industrials UK depot at Wembley is long established and meets a vital need for the sustainable important of aggregate, asphalt, and ready mixed concrete into London and should therefore be safeguarded. The NPPF states that existing, planned and potential sites for the bulk transport, handling and processing of minerals, concrete and aggregates should be safeguarded. In addition, NPPF states that planning policies should ensure new development can be integrated with existing facilities, and that they should not have unreasonable restrictions placed on them as a result of development permitted after they were established. DNL policy Si10 states that development plans should ensure sufficient capacity of aggregate rail depots is available and where practicable expand capacity adjacent to rail depots adjacent to major construction projects. Therefore the following text should be inserted into allocation BEGA1: 'the presence of an existing active rail aggregate depot to the west of the allocation needs to be considered to ensure future development proposals do not place unreasonable restrictions on this existing operation which is of strategic importance for the sustainable supply of aggregates into London.'	It is recognised that the aggregates operation provides an important function. The eastern part of the Growth Area's location adjacent to operational rail lines, plus the fact that it is expected that any redevelopment will have to re-provide industrial type floorspace on site, aligned with other policies in the development plan such as London Plan Policy D13 Agent of Change should ensure that design and layout of new development provides acceptable solutions for a satisfactory residential environment whilst providing adequate protection of existing noise generating uses. Nevertheless, identification of the implications of the aggregates facility on potential development within the growth area is considered appropriate.	Amend BEGA1 Planning considerations to include: " <u>The presence of an existing active rail aggregate depot to the west plus matters such as the proximity to operational railways and the need to re-provide industrial uses on site needs to be considered to ensure future development proposals do not place unreasonable restrictions on non-residential uses whilst creating a high quality residential environment.</u> "
5.2 East	BEGA1	John Cox	The proposed masterplan for the Neasden Stations Growth Area should cover the neighbouring Church End Growth Area also. It states in BP5 and BP2 respectively that you will: 'safeguard land for the West London Orbital route' and the latter: '...and associated infrastructure'; why the difference? How will this be safeguarded and is it only public land that is included? The Plan should include positive wording that gives the masterplan a sound steer, documenting reasonable possibilities and constraints for the area. The USP for the Growth Area is having both a grade-separated junction and a major road, and two rail stations at right angles of one another, giving easy rail access to much of north and west London. The historic desire to connect Great Central Way to Neasden Lane should not be taken forward. One potential option (which should be referenced in the Plan) is to consider some of the area as two vertical layers. The lower to provide logistics warehousing connected to the North Circular via Great Central Way to the north, which would have no access to the south but would provide (from connection with the M1) a storage site for last mile delivery. Above that and lowering to ground floor further away would be housing and a new local retail centre. The units would be predominantly car free with no road access to the north. Easy access to the stations is integral for the Growth Area. The railway lines could serve as either a barrier, or an opportunity for architects to devise solutions. It is difficult to ascertain whether or not both logistics and housing providers would be interested in such a concept, with its given risks, however, it should be tested nonetheless. This should not negatively impact the function of	The two areas are being considered separately but the links between them will be identified and any mutual dependencies made clear. For BP2 there is likely to be a requirement for station infrastructure/ access points to the station, etc. which could require more land take than within the ownership of the rail infrastructure bodies. The potential of the stations is identified and recognised through the designation of the Growth Area status. The site levels provide an opportunity to accommodate two separate functions, which the masterplanning can further develop/ test. Access to the north across rail lines presents possibilities, but also obstacles. The potential for the Dudding Hill Line to link to the Chiltern Line as identified through previous Crossrail feasibility work is understood. Nevertheless, there is no scheme/ project identified for delivery within the lifetime of the Plan and the reservation of a corridor will compromise significant parts of the Growth Area, without any clarity on its real environmental impacts and how development should address these. As such, it is not considered appropriate for this Plan to identify a potential corridor through the site. Masterplanning will assist with providing a deliverable improvement of the Church End centre. Whilst the centre is performing poorly, its enhancement could improve its fortunes. If not, the Local Plan provides the flexibility to allow loss of retail frontage to other uses that retain active frontage	No change.

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			<p>both Neasden and Church End town centres.</p> <p>The integration of the railway lines within the Growth Area requires thorough analysis of the corridors needs over the next 50 year period. Neasden is on the Jubilee line, with unused metropolitan line platforms. If the Growth Area and WLO are successful, it would be possible to change the through-running, if only during off-peak hours, rather like Piccadilly line trains which sometimes stop at Turnham Green District Line station. The only heavy rail line route out of London Marylebone splits in two south of Neasden's North Circular girder bridges. From there the western arm is the Chiltern Mainline which continues to Birmingham, and the north-western Chiltern Aylesbury Branch, which runs alongside the Metropolitan/ Jubilee lines stopping first at Harrow-on-the-Hill. The Dudding Hill Freight Line crosses the heavy rail and Underground tracks at right angles just south of Neasden Station on a four-track-abutment bridge, with only two tracks fitted with spans. Finally there is a descending single-track chord, from the Dudding Hill Line south to the Chiltern Main Line west. Current layout stops trains reaching the Aylesbury branch. The chord to the Chiltern Mainline is mainly used as a reception siding for mineral trains that reverse into the Great Central Way cement works siding on the inside chord. These sidings could be connected again to the Dudding Hill Line at their other end which would make it unused commercially, although network rail would likely want to maintain the link for stock and maintenance trains. The primary requirement within the masterplan should be to protect the possibility of a 1990s planned flyover from the Dudding Hill Chord to the Chiltern Aylesbury Branch. Such a flyover south of the North Circular Road avoids any flat junction across the Chiltern Main Line, which is already at capacity. You should research the history of that provision.</p> <p>It is not acceptable to totally rely on strategic planning by Network Rail, which is sometimes opportunistic in pursuing merely short-term gains. There seems no great strategy at the Department for Transport either.</p> <p>An example was the lack of support for a fit-for-purpose, high-capacity Dudding Hill Line connection at any Brent Cross station on the Midland Main Line, That situation was only reversed by accusing Network Rail of maladministration, non-compliance with the Nolan Principles of Public Life, and by threatening to take it to the high court.</p> <p>Church end is the least attractive retail road in the borough. Oppose requirement within BSSA3 for retention of active frontages at ground floor, as is not justified. This section of the road has too many shops. Let those on the south be bolstered by their loss. The car tyre site on the south is inappropriate with cabling running across the pavement, and should be supported to relocate.</p>	<p>and failing that should this not be viable, eventually residential.</p>	

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5.2 East	BEGA2	Amafhh Investment Limited	g) The policy should allow other uses as part of a mixed use development compatible with the industrial and employment nature of the Staples Corner SIL as part of mixed-use development, including residential, religious and community uses, hotel and conference centre.	g) Taking account expanding the list of acceptable uses is not considered appropriate at this time.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	b) Clarity is required for current non-SIL compliant uses and/or where they have fallen into disrepair/no longer usable. The GLA's 'Industrial Intensification and Co-Location Study: Design and Delivery Testing' Section 2.2 states "non-industrial floorspace (e.g. B1A, A and D uses classes) ..not in use in support of an industrial activity (e.g. standalone offices, retail, leisure etc., tenanted by a non-industrial business) is not included in the industrial floorspace calculation, but is to be included in the potential industrial floorspace calculation that could be accommodated on the site at a 65% plot ratio". The policy should be amended to make it clear that sites/properties not in (or last used for) industrial use and/or no longer usable should not provide like for like replacement industrial floorspace, but rather the 65% plot ratio.	b) As the London Plan and associated documents sets out what happens in these circumstances, there is no need for the Brent Local Plan to repeat this.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	d) The policy needs to include a timescale for the masterplan's completion/adoption, ideally by 2020.	d) Initial feasibility work on masterplanning is being undertaken with the GLA and Barnet. As the policy is challenging in terms of GLA policy outcomes and represents an early exploration of Intensification on a SIL site, work will take some time. This is accommodated in the delivery timescales, as the Plan does not identify any potential dwellings coming forward in the first 10 years of the Plan.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	f) The policy does not reflect London Plan transport node policies (e.g. Policy GG2, GG5, D1A, D1B, E1 and E10) which seek to intensify land use, additional homes and workspaces, promoting higher density development and range of uses, in locations well-connected to existing and future public transport. The range of uses and density of development should reflect the opportunity.	f) At this stage prior to significant progress on the masterplan, an expansion of the range of uses is not supported at this time in policy.	No Change.
5.2 East	BEGA2	GLA	Staples Corner is SIL and as such DNLP policies E4, 5, and 7 should apply, intensifying and enhancing its industrial, storage and distribution functions and capacity. Co-location of non industrial uses would only be considered acceptable through a process of consolidation and intensification of industrial uses, enabling the released of some SIL without an overall net loss, prioritising B2 and B8. Reprovision of industrial uses would need to be established before release of SIL could be considered.	This is noted. The Council is looking to work positively with the GLA and Barnet in preliminary masterplan work to understand how this can be delivered. The Council does however ask for greater flexibility from the GLA in terms of the consideration of the ambition for the place and opportunity that Staples Corner brings from not just intensification but also co-location.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	Support the principle of Staples Corner Growth Area as a whole but concerned about policy wording: a) The policy is not consistent with draft London Plan's Policy E7 objectives to "ensure...overall...no net loss of industrial floorspace ...(and operational yard space capacity) within ...SIL and LSIS." Policy BEGA2 seeks to prevent loss of "employment floorspace". London Plan Policy E4 Part A specifies 'industrial' uses. Policy BEGA2 creates confusion by using 'employment floorspace'. It should be	a) This is a fair point. Part A of the London Plan policy does set out a range of industrial uses. As such reference in the policy will be changed to industrial.	Amend BEGA2 to remove references to "employment" and replace them with "industrial".

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			amended to refer to the need for replacement 'industrial floorspace', instead of 'employment floorspace'		
5.2 East	BEGA2	Amafhh Investment Limited	c) It is inflexible on development in advance of the Staples Corner masterplan (although Paragraph 5.2.18 gives a mixed message). A development embargo before the masterplan's completion is inappropriate (conflicting with Paras 49 and 50 of the NPPF). It is potentially damaging redevelopment occurring in time for the new Brent Cross Thameslink station's 2022 completion. The policy should be amended to be more in line with paragraph 5.2.18.	c) The London Plan indicates the range of uses acceptable within SIL, where non-industrial uses are proposed it requires a masterplan. In advance of the masterplan being agreed, where a site owner wants to bring forward a SIL compliant use the Council would welcome early engagement with a view to seeking to support the delivery of the development taking account of any draft masterplan.	No Change.
5.2 East	BEGA2	Amafhh Investment Limited	e) Brent Cross Thameslink station will open in 2022 not 2024.	e) Agreed, the station is planned to open in 2022 currently.	Amend references to Brent Cross Thameslink to confirm the opening date of 2022.
5.2 East	BEGA2	Natural England	Brent Reservoir SSSI is referred to as Welsh Harp. Whilst acknowledging this local name, we recommend the official name (Brent Reservoir SSSI) is listed clearly. This will allow relevant information to be found when doing research for information on the SSSI. Recreational disturbance caused by opening up the site for more public access would be a planning consideration in particular when delivering the BEGA2: Staples Corner Growth Area which is adjacent to the SSSI. Suggest a supporting policy noting the need to protect the SSSI, including management of visitor recreational disturbance.	Agreed a reference to Brent Reservoir SSSI in the policy is appropriate. Given the SSSI's status it is important that its ecological importance is not undermined. Reference to this can be added in the policy.	Amend Policy BEGA2 Planning Considerations: "...Open Space, <u>Brent Reservoir</u> Site of Special Scientific Interest, Site of...." Amend Policy BEGA2 Planning Considerations: ".....breeding wetland birds. <u>Natural England</u> have also identified, given the ecological status of the area, the need to protect the SSSI particularly with regards to potential disturbance from visitor recreational activities. "
5.2 East	BEGA2	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	This has been adequately addressed in the infrastructure requirements.	No Change.

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5.2 East	BEGA2	TfL Spatial Planning	Reg 19 update/ required changes: "The Council together with TfL will consider the extent to which the area can support car-free development and mitigate impacts through suitable improvements to public transport, active travel and measures to not adversely impact on neighbours' amenity of any potential parking displacement. There is a need to work with TfL and Barnet Council to provide improved links from the site to the proposed new station and wider Brent Cross regeneration area."	This change is considered appropriate to address the potential to reduce car use but also ensure existing residents are not adversely impacted.	Update policy BEGA2 Planning considerations with: " <u>The Council together with TfL will consider the extent to which the area can support car-free development and mitigate impacts through suitable improvements to public transport, active travel and measures to not adversely impact on neighbours' amenity of any potential parking displacement. There is a need to work with TfL and Barnet Council to provide improved links from the site to the proposed new station and wider Brent Cross regeneration area.</u> "
5.2 East	BESA1	GLA	Predominantly industrial uses and lies within Wembley OA. Both designations should be treated in accordance with the DNLP. The site is bound by SINCS to the east, south and west, with a conservation area directly to the south. Allocation of B1-B8 needs to be clarified to make clear only B1(c), B2 and B8 uses would be acceptable, in accordance with policies E7 and E1 of the DNLP. B1(a) should be directed toward town centres and office clusters. The identified need for office space is very small at approximately 44,000m ² , as established by the ILDS 2017.	The site is not within the Wembley Opportunity Area, but is predominantly industrial. It is agreed that to be consistent with the London Plan it should clarify B1(c), B2 and B8 uses will be sought and the policy should be amended.	Amend policy BESA1 Allocated Use to: "...replacement of the existing B1(c), B2 and B8 floor space uses and on the McDonalds site A1-A5 and/or B1(c), B2 and B8 employment uses,...." Amend policy BESA1 Indicative capacity to " 3886 5647 sqm B1-B8 on the existing employment sites (0.65 plot ratio) and 400 sqm A1-A5 uses/B1(c), B2 and B8 on the McDonalds. Amend policy BESA1 Justification to: ".....ensure continued provision of <u>employment industrial space</u> , so will seek its retention of <u>employment these</u> uses on site."
5.2 East	BESA1	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: There should be no issues concerning wastewater capacity. The developer and LBB should still liaise with Thames Water at the earliest opportunity to advise on phasing.	This has been adequately addressed in the infrastructure requirements.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	BESA1	Mary Duffy	Aitch have been given planning permission for the redevelopment of the brick reclaimers yard for a 6 storey building. Consultation with existing residents was almost non-existent. Taller than 6 storeys should not be allowed. The entire site is in floodplain and an area that Thames Water identify with a flooding sewers problem.	Noted. The policy sets out a 5-6 storey height for the site. Small parts of the site are currently within the 1:100 year fluvial floodplain, but substantial parts are not. It is accepted that it is surrounded by fluvial floodplain and that in the future the site, if more extreme events of flooding occur, such as a +70% event, the area will be within Zone 3 floodplain. The site policy is clear applications should take a sequential approach to development on the site. This will seek to avoid floorspace within the current floodplain, but in the exceptional circumstances where this cannot be the case, suitable mitigation measures will be in place to protect people and property on site and not unacceptably increase flood risk elsewhere. Permission 18/2984 indicates that suitable mitigation measures can be put in place to ensure that development can be made acceptable. The need to address Thames Water requirements early in the development process has been identified in the policy.	Amend BESA1 to account for a proposed update to the SFRA Level 2 document.
5.2 East	BESA2	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: There should be no issues concerning wastewater capacity. The developer and LBB should still liaise with Thames Water at the earliest opportunity to advise on phasing.	This has been adequately addressed in the infrastructure requirements.	No Change.
5.2 East	BESA3	SMC Investcorp	Support allocation. The site was previously occupied by Gower House School which closed in 2016. There is no evidence to justify the D1 use needs re-providing in this location. The private school has not been used for 3 years as was no longer viable. There is no legal requirement for a private school to be re-provided. The sites context and characteristics limit the suitability of re-provision which was made evident when it went for sale in 2016. Implications of D1 retention will include a lengthy marketing process, delaying delivery of much needed homes. The site can deliver a greater number of homes (~60) than has been identified, aligning it more closely with the NPPF which seeks to optimise efficient delivery.	Support for the allocation is welcomed. Consistent with the London Plan policy S1 Developing London's Infrastructure Criterion G, "redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative forms of developments are considered...." In supporting development of sites for new dwellings, the Council has been clear in the Plan that this must not be wholly at the expense of other uses which are of less value and therefore likely to find it hard to compete for premises that become available either as a going concern or providing the potential for other non-residential uses. e.g. draft Policy BH2. On this site the Council recognises that its position along what on a wider level has been identified as an intensification corridor provides the opportunity for an intensification of the use of the site, principally for housing. Nevertheless, this should not be at the expense of the potential for social infrastructure premises to support community needs/demands. As such it considers that some replacement D1/ community use floorspace is justified.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.2 East	Blank East	Mary Duffy	Local Plan proposes significant and unwelcomed changes to local character within the East Place. Residents do not support tall buildings. There should be no reduction of conservation areas.	Significant change is not proposed for the majority of the East Place, it will be concentrated in two identified growth areas and along some intensification corridors which have good access to public transport. Tall buildings are required to meet the needs related to the projected growth in population of the borough which cannot be met wholly using low rise development. The review of Neasden conservation area will be subject to its own statutory process, which will have to take into account consultation responses.	No Change.
5.2 East	Blank East	Mary Duffy	The Welsh Harp should be preserved as a SSSI and wildlife refuge.	The Welsh Harp will be preserved as a SSSI and its status is reflected in the policy, its potential recreational value will need to be balanced against not undermining its SSSI status.	No Change.
5.2 East	Blank East	Mary Duffy	There is no mention of Neasden Recreation Ground, a park which has been neglected/ deliberately run down by the Council.	The Neasden Recreation Ground is included within the wider Welsh Harp open space designation as on the ground there is no specific delineation of its boundaries.	No Change.

5.3 NORTH

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	Figure 16	Rolfe Judd Planning	Reference to LSIS should be clearly defined and specifically identified within the supporting text, and within figure 16 where they should be included within the key. Figure 16 refers to 'Key Employment Sites' which do not have clear extents and nor are they clearly defined. Therefore clarification is sought as to the nature of a Key Employment Site, and their relationship with LSIS.	Noted. LSIS has been referenced where appropriate, including within site specific allocations. The spatial distribution of LSIS can be seen on the policies map. For simplicity figure 16 currently bunches together SIL and LSIS sites under 'Key Employment Sites'. This is seen as clear and should not require further clarification. See amendment proposed in relation to Place Plans identifying more detailed boundaries can be found on the policies map.	No Change.
5.3 North	Figure 16	Rolfe Judd Planning	Figure 16 is poor quality and needs to be higher resolution. The figure needs to include clear identification of surrounding streets and property boundaries. If not possible within the plan, a separate file should be made available.	The policies map on the Council's website provides detailed boundaries which will enable zooming into locations to occur, reference to this can be made adjacent to the Figure. It is accepted that some street names could assist in orientation and that where High Level Plans of the Place should include them where this does not undermine the simplicity/ clarity of the Figure.	All High Level Plans of the Place amend: Include some street names to assist with orientation. All High Level Plans of the Place amend: "High Level Plan of the Place. <u>More detailed boundaries can be seen on the Policies Map</u> "
5.3 North	BP3	Rolfe Judd Planning	Remove masterplanning requirement from criterion D.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation.	No Change.
5.3 North	BP3	Resident	Criterion h) Fryent Way is largely part of Fryent Country Park and any development would encroach on the park's setting, going against the NPPF and the aims of the plan.	Noted. H) The Council has significant housing targets to meet the needs of its population growth. The London Plan includes a small sites housing target. In order to prepare positively for this, the Plan has identified a number of 'Intensification Corridors'. This corridor is set a respectable distance away from the park itself. Applicants will be expected to take the context of the area into consideration, including the park and its approach.	No Change.
5.3 North	BP3	Resident	Criterion I) Adding floors to homes will not solve housing shortages and no evidence has been provided that would prove otherwise.	I) Intensifying current low density housing within the borough will help provide additional homes. The requirement to prepare positively for small sites development is a requirement within the London Plan.	No Change.
5.3 North	BP3	DTZ Investors	Support as identified as acceptable for tall buildings, and seeks continued residential development.	Support welcomed.	No Change.

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5.3 North	BP3	DTZ Investors	Object as criterion N, O, & P are not justified or effective. Each should be amended so as to state that their requirement is 'subject to objectively assessed needs.'	Noted. The Indoor Sports and Leisure Needs Assessment (2018) notes that this place has a number of strategic sports halls. In order to ensure the boroughs demand is met, their capacity will need to be improved. With regards to a new swimming pool, it states 'Identify opportunities to potentially meet the need for a new leisure facility that incorporates swimming pool provision.' This is further strengthened in paragraph 5.3.37 which states 'the Council will consider the need for a new leisure facility within this place, taking into consideration an up-to-date analysis of demand.' The wording of the policy, supported by this clause, is deemed sufficient in establishing when such a facility will be identified as necessary. Similarly with regards to secondary schooling, the Council will not plan to build unnecessary accommodation to over-provide spaces as this would not reflect a prudent use of resources, as such provision will be based on identified needs.	No Change.
5.3 North	BP3	Mercedes-Benz Retail Group	Overall aspiration of policy supported, however, lacks detail and quantum within the homes section which reduces its effectiveness. The inclusion of a place based housing target would help set the tone for the North Place in relation to the wider borough targets. Policy also requires masterplanning in the Capitol Way Valley which, although would be useful, would be better placed in the supporting text rather than the policy itself. This will restrict land coming forward ahead of the masterplanning and subsequent land assembly process. Paragraph 5.3.28 is more positively worded in this respect, including: "in advance of the adoption of a masterplan for this site, the council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan". The masterplanning process may be slow, requiring consultation and extensive resources and will therefore inhibit delivery in the short to medium term. In summary, the text referring to masterplanning should be removed from the policy, relying instead on the supporting text in paragraph 5.3.28.	The North Place Growth Area Policy (BNGA1) outlines the quantum of homes for the Burnt Oak and Colindale Growth Area. Policy BH2 prioritises Growth Areas for housing delivery and aims for at least 60% of homes to be located within Growth Areas. Draft London Plan policy E7 requires designated industrial sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This is seen to justify the inclusion of the non-LSIS land to be subject to a masterplan also. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.' The provision of a masterplan as a coherent vision for the area will help bring forward the site comprehensively, allowing for the joint delivery of essential infrastructures and social infrastructure.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BP3	Savilles on behalf of client	Support, however, reference to need for masterplan at Capitol Valley site in part d, and 5.3.28 is not justified in context of paragraph 35 of NPPF. It is not clear how or when this will come forward, and if not timely would be prejudicing potential sustainable development in conflict with paragraph 11 of NPPF. DNLP states that intensification and co-location should come forward as part of a Plan-led approach OR masterplanning process. Therefore BNGA1, BP2, BE2, and BNSA1 set out a clear enough vision for the area for development to accord with. With regards to the masterplanning approach, the GLA Practice Note (2018) suggests that these can either be developed ahead of planning applications or alongside. This should be a 2 stage process with the first identifying appropriate areas for intensification or co-location (the Local Plan essentially covers this), with stage 2 focussing on the more detailed outputs of specific areas. BNSA1 does have detailed specification to some extent, however, it is seen that stage 2 could be completed at pre-application process. The policy suggests that any applications would be premature until a masterplan is in place, and these grounds are not sufficient to reject an application. This is supported by NPPF paragraphs 49 & 50 as there would be clear policies in place that set out the vision for the area. See suggested wording with regards to the above in full comment.	Noted. Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how this site will come forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.' A masterplan process will help bring forward the site comprehensively, allowing for the joint delivery of essential infrastructures and social infrastructure. The drive for landowners to co-operate to bring forward the site comprehensively has not been demonstrated. Therefore, in order to ensure efficient development of land, the Council sees it as necessary to continue down the masterplanning route, and not alongside an application.	No Change.
5.3 North	BP3	TfL Commercial Development	Support tall building development within Intensification Corridors, Town Centres (including Kingsbury), with particular support with regard to residential development within Town Centres. Whilst we support the approach taken in the tall building study, we consider the limitation on heights within part B of policy BP3 of between 5 and 6 storeys to be overly restrictive. This inhibits the efficient use of land and will discourage development. This should be made flexible in line with NPPF and DNLP, allowing the determination of heights on a case by case basis. This should consider the visual, functional, environment and cumulative impacts, including the local context, infrastructure capacity, existing and planned connectivity and accessibility.	Noted. Tall buildings should be directed toward the Tall Building Zones. These provide sufficient scope for upward development. The London Plan supports the identification of areas appropriate for tall buildings, such as clusters. The development of significantly tall buildings outside of these areas will undermine the Council's strategy in consolidating them, whilst retaining the general low-rise character elsewhere. Sites which are appropriate for greater development have been identified as site allocations, are within growth areas, or are within Tall Building Zones. The proposed heights within town centres are seen as appropriate to balance the function of the centres, whilst providing for additional sustainable housing development. The policy allows for the potential for taller buildings in strategic locations in town centres, thus there is some further flexibility in these locations.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BP3	Rolfe Judd Planning	Colindale LSIS should be referred to as Capitol Way Valley.	Noted. To avoid confusion between the Capitol Way Valley site allocation, and the LSIS land within, it is seen as appropriate to differentiate. The proposed transformational change will encompass the vast majority of the site allocation, with the remainder being heavily influenced by such changes within a forthcoming comprehensive masterplan.	No Change.
5.3 North	BP3	Resident	Criterion i) The role of Kingsbury as an ethnic food destination should not be enhanced as the food has high food miles and would not be sustainable and would be disastrous for the origin communities suffering over farming.	i) Much of the food will be locally sourced, either substituting different ingredients for those used traditionally, or providing locally (UK) grown alternatives. In addition its often dried/ preserved nature means that it can be shipped on the seas rather than by air. Catering to foreign markets helps provide income and currency for origin countries and if done correctly through Fairtrade can improve quality of life in those locations.	No Change.
5.3 North	Para 5-3-26	Rolfe Judd Planning	It should be specified that tall buildings will be allowed in Capitol Way Valley.	The current wording of the paragraph, stating that tall buildings will be promoted within the Burnt Oak and Colindale Growth Area, is seen as appropriate. This includes the Capitol Way Valley site, but also further sites within the area. Reference to tall buildings on this site has been made within the site allocation (BNSA1) within the 'design principles' section. Further detailing regarding the specific height and location of tall buildings will be outlined in the proposed masterplan.	No Change.
5.3 North	Para 5-3-27	Rolfe Judd Planning	Reference to a masterplanning process should be removed from this paragraph.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of the 3 key sites within this place, and the LB Brent's designation as a 'Provide Capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how the sites will come forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. For those sites which do not contain within their boundaries designated industrial land, it is seen as appropriate given the multitude of land owners, and therefore the likely avoidance of a piecemeal approach to delivery. The draft London Plan requires sites to maximise delivery of homes as appropriate. A masterplan is seen as the only feasible means of ensuring such delivery is maximised, and that piecemeal delivery does not preclude the sites optimum occupation.	No Change.

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5.3 North	Para 5-3-28	Rolfe Judd Planning	Suggest deletion of this clause.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. The paragraph does build in some flexibility to the clause which is seen as sufficient, stating that 'the Council will resist small scale release, <u>unless it can be shown to not undermine the outcomes of any likely adopted masterplan.</u> '	No Change.
5.3 North	Para 5-3-40	Rolfe Judd Planning	LSIS sites should be clarified, and referenced within Figure 16.	Noted. The policy map (which upon adoption will be made interactive) includes all appropriate layers, including site allocations and employment land designations. This is seen as sufficient so as to allow for overlaying and cross comparison. In addition, if a designation such as LSIS is included within the boundary of a site it is specified within the site allocation. The maps such as figure 16 are included to show a broad overview of the key spatial designations within each place. Those designations included are seen as appropriate, with the inclusion of additional designations only serving to reduce its function. This currently bunches together SIL and LSIS sites under 'Key Employment Sites'. This is seen as clear and should not require further clarification.	No Change.
5.3 North	Para 5-3-47	Rolfe Judd Planning	Reference to a masterplanning process should be removed from this paragraph.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation.	No Change.
5.3 North	BNGA1	DTZ Investors	Support as: policy affords flexibility, and promotes mixed use regeneration along axis of Edgware road.	Noted.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.3 North	BNGA1	Savilles on behalf of client	Support mixed use regeneration, particularly through intensification and co-location within LSIS which is consistent with the DNLP. We suggest reference to co-location is strengthened to identify need to optimise residential. This would need align more closely with paragraphs 117 & 118 of NPPF, and DNLP policy E7 which seek to prioritise delivery of residential.	Noted. The allocation is already seen to provide sufficient weight toward the delivery of residential development. The LB Brent has been identified within the new London Plan as a 'Provide Capacity' borough. It is therefore prudent that we maximise the delivery of industrial floorspace on SIL and LSIS sites. Therefore we cannot accept that residential will be prioritised to the detriment of other uses, especially industrial and other employment uses. A future masterplan will address how the site can best accommodate a complementary quantum of both residential and employment floorspace, without compromising the ability to meet either target.	No Change.
5.3 North	BNGA1	Mercedes-Benz Retail Group	Supportive of the continued inclusion of the Mercedes site within the Growth Area boundary and the aspirations of Policy BP3: North. The inclusion of a housing and employment target for this growth area is also strongly supported. Promotion of effective land use and density optimisation would assist in meeting Brent's employment and housing needs. The emphasis on reduction in traffic dominance and promotion of active along Edgware Road is welcomed. The Mercedes site will assist with this.	Noted.	No Change.
5.3 North	BNSA1	Savilles on behalf of client	Support allocation, however, is heavily reliant on a masterplanning process. The allocation should not state that development will not be permitted until a masterplan has been adopted. This is not justified or positively prepared, and is inconsistent with DNLP policy E7 and would prevent sustainable development unnecessarily. The Council could not sustain an objection of prematurity if the Plan has not been adopted. As stated previously, this site, BNGA1, and BN3 meet the plan-led approach set out in E7. In summary a masterplan is supported but it should not preclude development, and should be produced with local stakeholders. In addition, the following points should be added: north south, east west connectivity improvements; landowners should work pro-actively with the council to bring forward timely development that is aligned with the place vision; applications prior to masterplan adoption must consider the sites relationship with the remaining allocation, and work with other landowners to ensure this; make effective use of land and optimise housing delivery; 76-77 Capitol Way is a crucial gateway site and able to accommodate significant co-located residential that will tie the LSIS with the residential to the west.	Draft London Plan policy E7 requires designated industrial sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum's of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, <u>unless it can be shown to not undermine the outcomes of any likely adopted masterplan.</u> ' A masterplan process will help bring forward the site comprehensively, allowing for the joint delivery of essential infrastructures and social infrastructure. All stakeholders will be engaged during the masterplanning process. Specific detailing with regards to the whereabouts of tall buildings and 'gateway sites' will be outlined within the forthcoming masterplan, and is not an appropriate detailing at this time. It should also be noted that	BNSA1 Design Principles amend: "...Access to the site to be considered carefully to ensure no conflict is created between different users <u>and the potential for north-south and east-west pedestrian and cycle connections in particular between Stag Lane and Edgware Road to be enhanced in number and quality...</u> "BNSA1 Indicative capacity amend: "A future masterplanning process <u>involving site owners/ occupiers and other stakeholders</u> will provide clarity"

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				Brent can identify a 5 year housing land supply and is not reliant on sites within this allocation that do not have planning permission for early delivery, i.e. within the next 10 years. As such a timescale has been built into delivery that allows masterplanning to be undertaken. The need to consider potential to improve east/west movement is considered to have merit. The Council would also expect to engage with stakeholders during the masterplanning process to ensure that the process is robust and likely to result in deliverable outcomes.	
5.3 North	BNSA1	Rolfe Judd Planning	Current text implies whole site is identified for industrial uses and is LSIS, this should be amended to refer to 'mixed-use' development.	This is accepted, parts of the site are not designated as LSIS and the Plan should be updated to reflect this.	Existing use amend: " <u>Transitioning mixed use and a Locally significant industrial site containing a range of uses.....</u> "
5.3 North	BNSA1	Rolfe Judd Planning	Correction of the 0-5 year range to a total of 414 dwellings (rather than 14) as provided for under permission 17/0837. Reinstatement of target figures (114) for the 5-10 year range.	The previous figures included the 414 units (as granted under permission 17/0837) spread across the two periods, with 300 (0-5) and 114 (5-10). Therefore, given the increased certainty of delivery in the short term, the two quantum's have been consolidated into the 0-5 year period. The 10+ year figure has been reduced from 786 to 686 as the former was seen as too optimistic given competing pressures on the site. However, a detail capacity analysis will be undertaken via the masterplan approach, resulting in a more accurate capacity figure.	BNSA1 Timescale for Delivery 0-5 years amend: " <u>414</u> "
5.3 North	BNSA1	Rolfe Judd Planning	The Planning Considerations should not include any reference to the requirement of undertaking a masterplanning process.	Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation.	No Change.

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5.3 North	BNSA1	Aberdeen Standard Investments	<p>Allocated use remains unchanged, and therefore we reiterate previous comments, supporting its allocation for mixed-use redevelopment including employment, residential and social uses. The site capacity and timeframe for delivery have been changed. Question the need to include specific timeframes for housing delivery, especially as the site capacity will be subject to a masterplanning process which itself is reiterated in part d) of policy BP3. This will serve as a potential barrier to delivery. We also question why the site capacity has been changed from 1200 to 500, particularly given the overall housing target increase from 23,711 to 27,482.</p> <p>The site is included within the amended Burnt Oak and Colindale Growth Area as part of the wider Opportunity Area, and can accommodate significant growth. In recognition of the 'Intend to Publish' London Plan housing targets for Brent (23,250) more emphasis should be placed on increasing intensification on this site, particularly residential. This would contribute to the London Plan's objective to 'meet and ideally exceed the final adopted housing target'. Moreover, increasing delivery would help facilitate the provision of family accommodation, in recognition of the need to provide 65% of additional homes as 3 beds, and to meet affordable housing targets at local and strategic levels. In light of this, and given the site is highly accessible and within an Opportunity Area, if timeframes cannot be omitted, figures should be increased so that they reflect those in the Preferred Options draft (300 0-5, 114 5-10, and 786 10+) culminating in 1200 total units.</p> <p>Previous comments stating residential development should be directed toward the west, with more intensive industrial uses (within B2 & B8) to the east remains valid. This will help protect residential amenity of existing residents. As does the contentions with height, scale and massing which should be maximised, where appropriate subject to design consideration such as stepping down to 2/3 storey units in the west.</p> <p>The requirement of the entirety of the site to go through a masterplanning process prior to delivery imposes an unnecessary barrier to redevelopment on a site whose delivery is crucial to meeting employment and housing targets. The process may take up to 18 months to adopt before any development can take place.</p>	<p>Noted. See proposed change. The allocated use includes mixed use development including employment uses and co-location with other uses. This is sufficiently flexible so as to include additional uses. The timeframe for delivery is indicative only, and through the Housing Trajectory, provides a basis for Council forecasting. It also increases the effectiveness of the plan at meeting the Mayor's housing targets. Taken into account the amended typo, the site capacity has been reduced from 1200 to 1100. This has been revised in the context that LB Brent has been identified within the new London Plan as a 'Provide Capacity' borough. It is therefore prudent that we maximise the delivery of industrial floorspace on SIL and LSIS sites. Therefore we cannot accept that residential will be prioritised to the detriment of other uses, especially industrial and other employment uses. A future masterplan will address how the site can best accommodate a complementary quantum of both residential and employment floorspace, without compromising the ability to meet either target. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This is seen to justify the inclusion of the non-LSIS land to be subject to a masterplan also. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum's of residential and employment floorspace to be delivered. Specific detailing with regards to the layout, location, and types of development will be outlined within the forthcoming masterplan, and is not an appropriate detailing at this time. The masterplan will help provide clarity as to the specific site capacity. A masterplan process will likely serve as a barrier in the immediate short term, however, the provision of a masterplan as a coherent vision for the area will help to ease the concerns of otherwise uninterested land owners.</p>	BNSA1 Timescale for Delivery 0-5 years amend: "414"
5.3 North	BNSA1	Thames water	<p>Wastewater network may be insufficient. Local upgrades to drainage may be required. Where a constraint exists, the developer should liaise with Thames Water to determine a strategy which should be submitted with the planning application.</p>	<p>Noted. The likely requirement of wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan is included within Infrastructure requirements. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.</p>	No Change.

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5.3 North	BNSA1	Rolfe Judd Planning	Site boundary: Updated to include clear identification of the LSIS and its boundaries. Updated to include clear identification of 'Key Employment Lands' boundaries. In the event that LSIS and 'Key Employment Lands' comprise the same area, it is suggested this be rationalised and a single consistent description be provided.	Noted. The policy map (which upon adoption will be made interactive) includes all appropriate layers, including site allocations and industrial land designations. This is seen as sufficient so as to allow for overlaying and cross comparison. In addition, if a designation such as LSIS is included within the boundary of a site it is specified within the site allocation. The maps such as figure 16 are included to show a broad overview of the key spatial designations within each place. Those designations included are seen as appropriate, with the inclusion of additional designations only serving to reduce its function. This currently bunches together SIL and LSIS sites under 'Key Employment Sites'. This is seen as clear and should not require further clarification.	No Change.
5.3 North	BNSA1	Rolfe Judd Planning	Indicative capacity should be removed as covered within timeframe for delivery.	Noted. Indicative capacity provides a total dwelling capacity as seen as feasible at this stage, whereas the timeframe provides a breakdown of delivery temporally. However, it should be noted that these figures are only indicative, with a more accurate figure being sought through a forthcoming masterplan approach.	No Change.
5.3 North	BNSA1	Rolfe Judd Planning	BNSA1 should be referred to as Capitol Way Valley and should not include reference to LSIS.	Agreed that the text can be amended to make it clearer, although it should still make reference to LSIS.	BNSA1 Description of the existing site amend: " <u>.....Located to the east of the LSIS within the site allocation is a car dealership and associated servicing workshops, parking/ storage land. A petrol station forms the north eastern western corner.</u> "
5.3 North	BNSA1	Rolfe Judd Planning	It should be made clear that reference to LSIS is not in relation to the Capitol Way Valley site.	Agreed that the text can be amended to make it clearer, although it should still make reference to LSIS.	BNSA1 Policy Justification amend: " <u>.....Furthermore, the intensification/ colocation of the LSIS and Capitol Way Valley with the <u>Burnt Oak and Colindale Growth Area</u> will contribute to meeting the 'provide capacity' status given to Brent within the London Plan. Currently, although the vacancy rates are low, the site is not intensively used and contains a number of two storey buildings that vary in condition. The LSIS-Capitol Way Valley also has good access to services and amenities which will support intensification/ co-location.</u> "

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5.3 North	BNSA1	Rolfe Judd Planning	<p>Masterplanning and development freeze – Capitol Way Valley. Supporting text refers to the Capitol Way Valley as being LSIS which reads as though the whole site allocation is LSIS which is not the case. Timeframe for delivery identifies 14 units within first 10 years which is an error as approved scheme has permission for 414 units. Requirement for masterplanning effectively freezes development on site which is unreasonable and unnecessarily prohibitive. This requirement, given longstanding area growth targets, and without clear timeline or guidelines creates significant uncertainty for land owners and developers, reducing the plans effectiveness and development viability. Whilst this approach is considered best practice, it typically occurs prior to redevelopment. Given the advanced stage of development within the area this requirement would result in market uncertainty and compromise delivery. Further, such an approach has already been compromised by the granting of permission of significant development in the area to date, including 08/2823 & 17/0837. These permissions were reached via consultation with the Council, and did not require a masterplan. Overall it is considered that masterplanning is unnecessary as there is sufficient policy in place, and sites with extant permission to enable efficient development. A masterplan would incur significant additional costs and extended timeframes resulting in uncertainty and undue delay. DNLP policy E7 suggests that the renewal of LSIS may be subject to a masterplanning process. In this regard, as having existed in planning policy for a significant period, BNSA1 satisfies the requirement to be considered part of a plan-led process and that it does not require being part of a masterplan process. The current wording within this chapter also suggests that both the LSIS and non-LSIS sections of land within this allocation will require masterplanning which is considered unreasonable and contradictory to the requirements of DNLP policy E7.</p>	<p>Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach if non-industrial uses are to come forward as part of the redevelopment of the LSIS. The Brent Local Plan itself provides the basic structure for how we see this site coming forward, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes in association in the case of Brent to an intensification of industrial land to provide additional capacity. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This is seen to justify the inclusion of the non-LSIS land to be subject to a masterplan also, as depending on the amount of residential that can be delivered, associated social infrastructure may also be required which needs to be planned for. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum's of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.' In the case of proposals for pure industrial development within LSIS that are consistent with the London Plan in meeting minimum on site re-provision, the Council will take a more flexible approach. Similarly on sites outside the LSIS flexibility is could also possible depending on circumstances.</p>	No Change.
5.3 North	BNSA1	Rolfe Judd Planning	<p>This site accommodates a retail car dealership and is fundamentally A1 use and should not be grouped as B use class and should be considered separate to LSIS to the west. Whilst the site currently includes a service component, given current market trends, increased service intervals for modern vehicles and a push toward electrified vehicles, this role will likely lessen over time and may be relocated. Therefore any future development should maintain and enhance this principle retail function. This should also apply for the adjoining Lexus site and Asda site. Given the scale of the Asda site and its associated increase in catchment, any future redevelopment should maintain a supermarket component. These sites should therefore not be referred to as industrial sites or Key Employment Sites and excluded from LSIS.</p>	<p>The car dealership is not included within the LSIS land designation, however, it does incorporate a substantial vehicle service element which falls within B2. As such the Council considers that this element should be regarded as a local employment site. As Brent is a 'Provide Capacity' borough, it will be expected that the Mercedes site provides at the least no net loss of industrial floorspace. It is accepted that a car retailing element may sought to be retained/re-provided as part of the redevelopment of this site which may well also incorporate residential development on the upper floors and on the remainder of the site not required for industrial use. This is not considered to be inconsistent with the allocation. The allocation is not seeking to prevent things happening, it is looking to ensure a coherent and comprehensive approach to</p>	<p>BNSA1 planning considerations amend: ".....impact assessment. <u>Similarly the retention of a retail car dealership function on the Mercedes site is also considered appropriate if required as part of an intensification of floorspace and provision of other allocated uses on that site.</u>"</p>

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				creating a community that has an appropriate mix of uses, social infrastructure and place-making that is also consistent with the London Plan designation of the borough needing to provide more industrial capacity.	
5.3 North	BNSA1	Rolfe Judd Planning	Exclusion from LSIS and Key Employment Site designation. The location, function and future uses of the site should be clarified to ensure previous land designations are carried forward correctly in the Plan. The site allocation boundary should not generically refer to LSIS within said boundary, particular considering a significant portion of the site is not LSIS, nor does it contain any industrial uses.	Noted, see changes proposed in relation to other representations made by the respondent on this site.	No Change.
5.3 North	BNSA1	Mercedes-Benz Retail Group	Incorporation of the Mercedes site within this allocation is welcomed. The dealership floorspace will be rationalised and re-provided along with dwellings on upper floors. This will protect employment space. The draft policy is not sufficiently positively prepared. Requiring masterplanning of the whole allocation prior to any planning application being prepared and submitted may unnecessarily delay deliverability. The site's current adopted allocation has not sought to restrict the individual parcels of development coming forward. Consequently, delivery of TRQ adjacent has occurred. Moving forward early delivery of the Mercedes site will not prejudice the development potential of the wider allocation. It is outside LSIS and subject to the existing adopted allocation. Masterplanning benefits are apparent, but might well be time consuming to complete. The following text should be deleted from the planning considerations subsection of the draft policy: "the whole site will be subject to a masterplan process to comprehensively identify how it can increase useable employment floorspace, whilst contributing to the council's vision for the Burnt Oak and Colindale area of creating 'a mixed, vital, accessible and pleasant district'. Until a masterplan for the site has been agreed/ adopted by the council, no redevelopments (apart from 17/0837) will be permitted within this area".	Noted. Draft London Plan policy E7 requires designated employment sites which have been allocated for redevelopment through co-location to be either Plan-led, or subject to a masterplan approach. Given the size and complexity of this site, and the LB Brent's designation as a 'provide capacity' borough, it is deemed as necessary for this site to come forward through a masterplan approach. The Brent Local Plan itself provides the basic structure for how this site will be developed, whereas a masterplan will provide more specific guidance which would not be appropriate to include within the Plan itself. This is also appropriate given the sites numerous land owners, and will therefore negate any probability of the sites piecemeal delivery. The draft London Plan requires sites to maximise delivery of homes. This assurance can only be secured through a masterplan approach, allowing for optimum site occupation. This is seen to justify the inclusion of the non-LSIS land to be subject to a masterplan also. This will help the site come forward coherently, provide a framework for all land owners to work within providing certainty, create a better sense of place, ensure essential infrastructures are provided, and enable the required quantum's of residential and employment floorspace to be delivered. Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.' The Mercedes site has been allocated for a decade with no definitive progression of its redevelopment by its owners. The provision of a masterplan as a coherent vision for the area will help to ease the concerns of otherwise uninterested land owners. This will help bring forward the site comprehensively, allowing for the joint delivery of essential infrastructures and social infrastructure. Sites with extant planning permission will be considered when drawing up the masterplan. The existing site allocation did not have this requirement as the extent of redevelopment of this area was smaller in scale. The wider area, plus the need to meet draft new London Plan policy E7, and the identification of Brent as a 'Provide Capacity' borough mean that the site's inclusion within the masterplan boundary is considered appropriate.	No Change.

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5.3 North	BNSA1	Aberdeen Standard Investments	Our client respectfully requests that the text of BNSA1 be amended as follows – (proposed additional text is bold and underlined and text to be removed is struck through): Until a masterplan for the site has been agreed/ adopted by the council, no redevelopments (apart from 17/0837) will be permitted within this area. Future proposals for redevelopment will need to ensure they do not prejudice the future delivery of a wider masterplan.” This wording removes the barrier of a masterplan, whilst preventing harmful piecemeal development. LBB retains control of site delivery via the planning application process.	Paragraph 5.3.28 builds in some flexibility which is seen as sufficient, stating that 'the Council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.'	No Change.
5.3 North	BNSA1- BNSA3	GLA	The reconfiguration of LSIS should follow the approach set out in Draft New London Plan Policy E7. This means that reconfiguration of industrial uses within LSIS should be intensified to increase industrial floorspace capacity (or at the very least there should be no net loss). However, considering that Brent is a 'provide capacity' borough reconfigurations of this type should be aiming to increase industrial floorspace capacity contributing to a net gain across the whole borough over the plan period. Where BNSA1 overlaps with the Brent Cross/Cricklewood OA this should be made clear in the site plan.	Agreed, the text will be amended to provide greater clarity on this.	Paragraph 5.3.46 amend: "...the Growth Area boundary has been extended. <u>This new boundary is considered to form an extension to the Burnt Oak and Colindale Opportunity Area boundary previously identified to be within Brent.....</u> " Policies Map amend: Show the area within the Burnt Oak and Colindale Growth Area as also being the Burnt Oak and Colindale Opportunity Area. Policy BNSA1 Allocation amend: ".....comprising areas of employment <u>industrial</u> intensification....." Policy BNSA1 Planning Considerations amend: "...Locally Significant Industrial Site. <u>The Council considers it appropriate for co-location which will be delivered consistent with London Plan policy E7. The whole....</u> " Policy BNSA1 Planning Considerations amend: "...how it can increase useable employment <u>industrial</u> floorspace....." Policy BNSA1 Planning Considerations amend: "...how it can increase useable employment <u>industrial</u> floorspace,...." Policy BNSA1 Design Principles amend: "...enhance, its <u>industrial/employment</u> function...."
5.3 North	BNSA2	DTZ Investors	The term 'employment space' should be defined as it is currently unclear what is meant by this.	Accept that employment space could be more clearly defined.	BNSA2 Allocated Use amend: " Mixed use development to include residential, retail and employment <u>replacement industrial and office space/affordable workspace.</u> " BNSA2 Description of Existing Site amend: "Forming the southern part of the site is a car dealership,

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					servicing centre/workshop and associated car parking."
5.3 North	BNSA2	DTZ Investors	Correction: PTAL ranges from 2-'4', with the southern part 2/'3', and the central part 3/'4'.	PTAL essentially ranges from 2-3 with a very small portion of the site located within 4, however, this can be reflected in the policy.	Amend: The PTAL rating of the site varies from 2- 3 4. The majority of the northern and southern part is within PTAL rating 2, with the central part achieving PTAL rating 3-4.
5.3 North	BNSA2	DTZ Investors	'Development at this site should avoid having any detrimental impact on the setting of this building', which is in reference to the listed Beis Yaakov Primary School and Nursery, should not be stated. The Beis Yaakov Primary School and Nursery is a non-designated heritage asset and therefore subject to NPPF test paragraph 197. This disproportionately overstates the heritage significance of the property.	The heritage asset, the point is accepted and the policy will be amended.	BNSA2 Planning considerations: " Development at this site should avoid having any detrimental impact on the setting of this building. "
5.3 North	BNSA2	DTZ Investors	Infrastructure requirements: Thames Water has indicated upgrades to the wastewater network are likely to be required 'subject to justification.' Infrastructure requirements need to relate to the impacts of development, not just existing development.	It states within the Infrastructure Requirements section that Thames Water will need to be engaged at the earliest opportunity. This will serve to provide justification for the potential requirement of wastewater infrastructure at the time of delivery associated with the increase in development intensity on the site.	No Change.
5.3 North	BNSA2	DTZ Investors	Support allocation for mixed use development including residential and retail uses.	Support welcomed.	No Change.
5.3 North	BNSA2	DTZ Investors	Capacity should be revised to 800 as current indicative capacity of 500 equates to 125 DPH. The current LP would prescribe 170-405 DPH in an area with this PTAL.	The current capacity figure is indicative only. A forthcoming masterplan will provide a more specific capacity figure going forward. Although within a Tall Building Zone the capacity identified takes account of the need to reprovide industrial/ office space (or its replacement with affordable workspace) and other non-residential floorspace. Brent has been identified as a 'Provide Capacity' borough. It is therefore important that existing sites with employment uses (particularly industrial) that residential development is not prioritised to the detriment of other uses.	No Change.

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5.3 North	BNSA2	DTZ Investors	Commercial and retail elements should not be retained. Site allocations propose land uses, not retention of elements. This is not in accordance with NPPF or LP, especially the retention of out of centre retail.	The Council is aware that the existing retail onsite appears to be trading effectively. In order to provide sufficient value, and therefore incentivise further intensification of the sites, notwithstanding its out of centre location the policy was written to allow for re-provision of some retail at this site, if this is not required from a financial viability perspective, the Council would not actively seek replacement on the scale that currently exists.	BNSA2 Planning considerations: <u>"The site contains some existing Local Employment Sites in the form of industrial floorspace related to the servicing of vehicles as part of the car dealership and the office provision of Southon House. Consistent with the borough's provide capacity status in the London Plan the industrial floorspace should be replaced in line with London Plan policy E7. The office space will be subject to Brent policy BE3. As it is out of centre, the site is not a priority location for retail in terms of the sequential test. Nevertheless, the Council is aware that the retail element appears to be trading well, so is likely (subject to other London Plan and Local Plan retail policies) be receptive to re-provision of some retail if it is necessary from a viability perspective to encourage the site's more intensive development that makes for a more efficient use of land."</u>
5.3 North	BNSA2	DTZ Investors	Impact on the A5, and A5150 intersection as a result of introducing residential development at this site', should not be included within the risks. It is unclear what the actual risk is, and how residential uses could impact the A5. This should be clarified.	The risk associated with the impact on the A5 is due to cost of any junction improvements and its impact on viability, plus also timing that can be reflected in the policy.	BNSA2 risks: <u>"access to be reconsidered. This may increase costs affecting viability or slow down delivery."</u>
5.3 North	BNSA2	Thames water	Wastewater network may be insufficient. Local upgrades to drainage may be required. Where a constraint exists, the developer should liaise with Thames Water to determine a strategy which should be submitted with the planning application.	Noted. Likely requirement of wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements. 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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5.3 North	BNSA3	Blue Coast Capital	Support acknowledgement that masterplan process may reveal greater capacity than previously anticipated. We expect the capacity to be substantially increased. This is particularly true that whilst the allocation states no more than 6 storeys, a development of up to 7 storeys has been approved within the same allocation suggesting the potential for greater densities to be achieved. Therefore the allocation should not refer to a particular capacity or appropriate heights as may lead to false expectations and failure of site optimisation.	Noted. The capacity is only indicative at this stage. Through the Housing Trajectory, this provides a basis for Council forecasting. It also increases the effectiveness of the plan at meeting the Mayor's housing targets. The allocation states that development heights should be around 6 storeys. This builds in sufficient flexibility so as to allow for a variation of appropriate heights. The site does not benefit from very good public transport connectivity and as such has not been identified as a Tall Buildings Zone where buildings of over 10 storeys would be appropriate. Reflecting its acceptability as a mid rise location, around 6 storeys is seen as reasonable.	No Change.
5.3 North	BNSA3	Thames water	Wastewater problems unlikely. Developer and Brent should liaise with Thames Water at earliest opportunity to advise on phasing.	Noted. Representations made at Preferred Options stage stated 'the scale of development is likely to require upgrades to the wastewater network.' Therefore the following text has been input under the infrastructure requirements for this site allocation: '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 being required to meet additional demands created through the development.' It is considered that the wording is best retained within the site allocation to ensure that such infrastructure is considered should it be required by development.	No Change.
5.3 North	BNSA4	Thames water	We are unable to assess this site as no figures have been provided.	Noted. The existing building on this site is Grade II Listed. This imposes significant constraints upon the site's development, and therefore understanding the quantum of residential is difficult. To provide comfort similar to other allocations, the need to liaise with Thames Water at an early stage can be identified in the infrastructure requirements.	BNSA4 Infrastructure Requirements amend: " <u>Thames Water will need to be engaged at the earliest opportunity to agree a infrastructure phasing plan to ensure essential water infrastructure is delivered prior to being required to meet additional demands created through the development.</u> "
5.3 North	BNSA4	Theatres Trust	Support design principles and promotion of community uses.	Support welcomed.	No Change.
5.3 North	BNSA8	TfL Commercial Development	Welcome addition of site allocations for Wembley Park Bridge Road and Queensbury Station Car Park. However, the indicative capacity for Queensbury Station Car Park is too low and should be increased to 50 which is more appropriate and feasible if this site is to be optimised in line with DNLP policy H1 and NPPF chapter 11.	Noted. The capacity is indicative only. If it can be demonstrated through application that the site can be better utilised through sustainable development then permission may be granted. It currently assumes that the existing car parking is replaced on the ground floor and that development is mid-rise, consistent with the scale of the surrounding area.	No Change.
5.3 North	Blank North	Resident	Not sustainable. No regard for impact on wider area. Fails to consider impacts on nearby SINC sites, conservation areas, and transport.	Noted. The Council needs to plan to accommodate as best it can identified housing needs for its increases population. In order to prepare positively for this target a number of sites have been allocated for development. The allocations include within them the necessary considerations which need taking at application stage prior to receiving permission. More detailed impact upon SINC sites will be evaluated at this stage, and in accordance with the policies set out within this and the London Plan. Specifically policy BG11 will ensure sufficient mitigation	No Change.

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				and enhancements are undertaken when assessing impact on SINC sites. Policy BHC1 ensures heritage is considered if a development is seen to have an impact on any heritage assets. Transport is dealt with via a number of policies, including BT1 and BT2 which seek to reduce reliance on personal vehicles, and increase the uptake of sustainable travel modes, including public transport, walking and cycling.	

5.4 NORTH WEST

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.4 North West	Figure 20	Northwick Park Partnership	Northwick Park Growth Area should be shown on Figure 20 to help with identification.	Although the Northwick Park Growth Area is shown, it is not labelled specifically. Labelling it will make it clearer on this Figure and would also be useful on other High Level Plans of the Place.	Amend each High Level Plan of the Place to specifically name its respective relevant Growth Areas.
5.4 North West	BP4	Brent Parks Forum	Parks should be retained and enhanced, especially in light of projected population growth, and their impacts on health. The Plan should be explicit in recognising the need to retain both Tenterden Sports Ground and the John Billam Playing Fields as sports facilities and open space, and that required funding will be secured. These sites are used by the Forest United Football Club. This is recognised in policy BP4, criterion H, however, there is no mention of the John Billam Playing Fields. John Billam is referenced in paragraph 5.3.7, but it does not state it will be protected as green space. The open space in the area is limited, with schools being deficient, and therefore all open space should be retained. This has been addressed in the Strategic Approach to Playing Pitch Provision in Brent 2016, in addition to the Open Space, Sports and Recreation Study 2019.	Both sites are shown on the policies map as open space and as such will benefit from the associated policy protection in the London and Brent plans. It is recognised that reference to John Billam Playing Fields could be made in policy BP4 H.	Policy BP4 h) amend "....Claremont High School, <u>John Billam Playing Fields</u> and Tenterden Sports Ground"
5.4 North West	BP4	David Pearson	Parks should be retained and enhanced, especially in light of projected population growth, and their impacts on health. The Plan should be explicit in recognising the need to retain both Tenterden Sports Ground and the John Billam Playing Fields as sports facilities and open space, and that required funding will be secured. These sites are used by the Forest United Football Club. This is recognised in policy BP4, criterion H, however, there is no mention of the John Billam Playing Fields. John Billam is referenced in paragraph 5.3.7, but it does not state it will be protected as green space. The open space in the area is limited, with schools being deficient, and therefore all open space should be retained. This has been addressed in the Strategic Approach to Playing Pitch Provision in Brent 2016, in addition to the Open Space, Sports and Recreation Study 2019.	Both sites are shown on the policies map as open space and as such will benefit from the associated policy protection in the London and Brent plans. It is recognised that reference to John Billam Playing Fields could be made in policy BP4 H.	Policy BP4 h) amend "....Claremont High School, <u>John Billam Playing Fields</u> and Tenterden Sports Ground"
5.4 North West	BP4	Angela Barrett	Too many people already. Park lands should not be developed.	Noted. National policy requires the Council to plan to meet its identified housing needs related to its growth in population. The London Plan has set Brent a significant housing target to meet its identified need and that of the wider London area. To prepare positively for this, the Council must allocate sufficient land for development to meet housing targets and other targets such as employment land, social infrastructure etc. No open space has been designated for development in this Plan. The exception to this is a proposed 'land swap' at Northwick Park. This will involve the existing pavilion site. The pavilion will be demolished and reprovided closer to the station on the same size plot of land as the existing pavilion. The existing pavilion plot will be landscaped with green open space, improving the openness of the park, the new pavilion and its utility.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.4 North west	BP4	Sports England	It is noted that policy BP4 seeks to protect and enhance playing pitches at Northwick Park, JFS School, Claremont High School and Tenterden Sports Ground. However, NPPF paragraph 97 and Sport England Playing Field Policy, require the protection of playing fields which goes beyond just the playing pitch. The references to playing pitches should, therefore, be amended to playing field so it aligns with the NPPF and Sport England Policy.	Noted. This should be incorporated into the policy.	BP4 h) amend: "Protecting and enhancing playing pitch field provision at....."
5.4 North West	BNWGA1	Thames water	Wastewater network may be insufficient. Local upgrades to drainage may be required. Where a constraint exists, the developer should liaise with Thames Water to determine a strategy which should be submitted with the planning application.	Noted. Likely requirement of wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No Change.
5.4 North West	BNWGA1	Owners of the Ducker Pond site, Northwick Park, Nilkanth Estates, part of the BAPS Shri Swaminarayan Mandir community	See PDF for further details. De-designate Ducker Pond site from MOL land to allow for reinstatement of community, sport/leisure and social infrastructure to reflect its previously developed status. This would complement development plans at Northwick Park, and the golfing facilities to the south. The proposed development (see pdf) would facilitate the enhancement of the Capital Ring, achieve biodiversity net gain supporting the SINC status, and increase sporting/leisure & community events within the area. When considered together, these factors amount to exceptional circumstances that justify the alteration of MOL boundary. This would therefore be compliant with NPPF, DNLP policies GG1, GG2, GG3, S1, S4, S5, G1, G6, and G3 in particular, especially considering the recent panels report on the NDLP.	The site is identified currently as part of the MOL. There is the opportunity within MOL policy to consider a wider range of recreational uses consistent with this designation. The site is covered by a TPO, provides habitat for bats which are a protected species and is one of the few woodland habitats within Brent. Its replacement in terms of compensatory ecological measures of mature/ semi-mature woodland will be difficult to achieve in the short to medium term. For the more significant interventions in order to be consistent with MOL objectives, there is likely to be a need for compensatory re-provision of MOL elsewhere within the vicinity, with the most obvious area being the Northwick Park growth area. Given the MOL and ecological status of the site, which would appear to be a significant impediment to significant buildings/ structures within the site, at this stage it is not considered appropriate to incorporate the site within the Northwick Park Growth Area. Nevertheless, if suitable alternative solutions can be shown to overcome significant policy concerns, then it might be appropriate to consider this site as part of that wider area.	No Change.
5.4 North west	BNWGA1	Sports England	Welcomes amendment in including requirement for the Ball Strike Assessment. However, it would be more effective and consistent with NPPF (para 182) if it continued to state: "Should the ball strike assessment identify the need for ball stop mitigation then this should be implemented prior to the development's impact on the use of playing field".	This is accepted as a reasonable request to ensure the playing fields' use is not compromised.	BNWGA1 Planning considerations amend: "...A ball strike assessment will be required and any necessary ball stop mitigation implemented prior to the development's impact to ensure that new development does not compromise the role of the MOL in terms of sports provision....."
5.4 North West	BNWGA1	GLA	MOL land swaps are not supported in the DNLP. However, LP policy G3C states that any alterations to MOL boundaries should be through a Plan-led approach. Therefore this should be clearly set out within the new Local Plan and be subject to extensive consultation. Exceptional circumstances will need to justify such alterations.	Noted. The MOL land swap has been identified within the new Local Plan, with the Council's intentions clearly laid out. Brent, as part of the Northwick Park development operation, and under the One Public Estate programme, realises the requirement to justify alterations through exceptional circumstances, and the need to undertake extensive consultation.	No Change.

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5.4 North West	BNWSA1	Thames water	Wastewater problems unlikely. Developer and Brent should liaise with Thames Water at earliest opportunity to advise on phasing.	Noted. Representations made at Preferred Options stage stated 'the scale of development is likely to require upgrades to the wastewater network.' Therefore the following text has been input under the infrastructure requirements for this site allocation: '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 being required to meet additional demands created through the development.' It is considered that the wording is best retained within the site allocation to ensure that such infrastructure is considered should it be required by development.	No Change.
5.4 North West	BNWSA1	Mick Ruse	The railway land is not in public ownership, having been purchased from British Rail in 2008. The land is owned by myself and my wife, and enquiries should be directed to us.	Noted. See proposed changes.	BNWSA1 Ownership amend: "Private and small part public ownership"
5.4 North West	Blank North West	Angela Barrett	Open space should not be developed.	Noted. No open space has been designated for development in this Plan. The exception to this is a proposed 'land swap' at Northwick Park. This will involve the existing pavilion site. The pavilion will be demolished and reprovided closer to the station on the same size plot of land as the existing pavilion. The existing pavilion plot will be landscaped with green open space, improving the openness of the park, the new pavilion and its utility.	No Change.

5.5 SOUTH

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South	Page 152	Wembley Towers Limited	Note reference (page 152) to Wembley Point, Bridge Park Leisure Centre and the Unisys Building at Stonebridge Park currently presenting an unattractive borough gateway. There are a number of sites within close proximity to Stonebridge Park station that have the scope (either individually or cumulatively) to make a dramatic transformational change to the townscape. This can be through high quality design, enhanced permeability and optimised housing delivery through providing taller buildings, particularly to offset the negative aspects of the North Circular and to respond to the strong urban frontage.	Noted. This is reflected in the allocations of those sites and their identification within a Tall Buildings Zone.	No Change.
5.5 South	Page 152	Stonebridge Real Estate Development	Note reference (page 152) to Wembley Point, Bridge Park Leisure Centre and the Unisys Building at Stonebridge Park currently presenting an unattractive borough gateway. There are a number of sites within close proximity to Stonebridge Park station that have the scope (either individually or cumulatively) to make a dramatic transformational change to the townscape. This can be through high quality design, enhanced permeability and optimised housing delivery through providing taller buildings, particularly to offset the negative aspects of the North Circular and to respond to the strong urban frontage.	Noted. Such proposals will be considered at application stage. This will consider the host of policies within this Plan, the London Plan, and the NPPF. The identification of the area as a Tall Buildings Zone takes into account the potential for transformational change in this location.	No Change.
5.5 South	BP5	OPDC	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. Enhance cycle routes from Harlesden to Old Oak.	Support and future co-operation welcomed.	No Change.
5.5 South	BP5	Wembley Towers Limited	Supportive. Note criterion b) requirement. BCP5 criterion c) is supported in relation to the potential for taller buildings at Wembley Point with no reference to specific heights. Wembley Point provides an existing marker; building height will be dependent on the design quality, technical considerations and local context developed at application stage, with appropriate scaling and location of buildings related to its hinterland. Supportive of approach set out in paragraph 5.5.14 recognising a cluster of taller buildings could be appropriate in this gateway location to the borough.	Noted. The Tall Buildings Strategy sets out the appropriate heights for this location in the range of up to 26 storeys, similar to Wembley Point equivalent.	No Change.
5.5 South	BSGA1	thersa	A mammoth undertaking for the council to think it can sustainably revolutionise Church End into a nice place. Attitudes and actions of some people will undermine regeneration and renewal. To make lasting improvements requires improvement to people's attitudes and their appreciation of the benefits of modern society. Agree that Church End is in desperate need of regeneration, but for the plans to be realistic, you have to educate people about how bad things have been. Think nature, think natural rather than murals or mosaics. Maybe introduce car-free areas/pedestrianised areas to improve air quality. Work with local shops to improve the Church End area, which need greater diversity and reduce the need to travel. They are mostly owned and frequented by newer ethnic groups without a sufficiently broad appeal. The decline has become deeply	Noted. The Plan is aspirational, but also deliverable. The area is desirable for investors given its proximity to the newly identified Neasden Stations Growth Area, and the proposed West London Orbital site. It will become more so once its profile is raised through major development. Funds provided through predicted forthcoming development will help enhance the area's urban environment, with Plans to open up Church End to broaden its appeal. Both natural and artistic solutions will be used, neither at the expense of the other.	No Change.

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			entrenched, with action required to address anti-social behaviour and provide pleasant facades to enhance the environs.		
5.5 South	BSSA1	Kelaty Properties LLP	Principle of Asiatic Carpets site being required to provide industrial floorspace. The site has been used for TV and film production purposes for a continuous period in excess of 10 years and thus is not in Business Use class uses. Policies E4 & E7 of the draft London Plan does not require non-‘industrial’ uses to be re-provided where the site has been allocated for residential or mixed-use. This site already benefits from an existing allocation for residential. Notwithstanding this, the Council state that Brent’s ‘provide capacity’ status in Table 6.2 of the draft London Plan means that the allocation should provide for a mixed-use development, including an increase in industrial floorspace. Draft London Plan Paragraph 6.4.6 states: “Boroughs in the ‘Provide Capacity’ category...should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water.” It is clear the London Plan does not expect all existing industrial sites to be retained and intensified, but to focus in areas accessible to the strategic road network and with potential for transport of goods by rail and/or water. Dalmeyer Road’s existing width and alignment is unsuitable for an intensification of HGV access and egress. A revised masterplan supplied with this representation provides separation between residential and the industrial uses on the Cygnus Business centre site.	Noted. Draft London Plan policy E7, part A states that Development Plans should encourage the intensification of industrial uses on all categories of industrial land. This includes Local Employment Sites. Given that Brent has been identified as a ‘Provide Capacity’ borough, and therefore has a substantial floorspace target, it will be necessary for all appropriate sites to be intensified. This site has an existing industrial use with filming being identified as an industrial process in the Use Classes Order, and is partly designated as LSIS. It therefore has the precedent of existing industrial/ employment uses. This has functioned effectively on the existing site and will therefore be capable of doing so going forward. Taking account of GLA representations on the Plan, the allocation of existing industrial land for other uses in Plans does not apply retrospectively, but is assumed to be considered as part of the Plan process subsequent to the adoption of the London Plan.	No Change.
5.5 South	BSSA1	Kelaty Properties LLP	Phasing and deliverability of Asiatic Carpets site. Combining Asiatic Carpets with the Cygnus Business Centre as a single allocation is inappropriate. Asiatic is in single ownership. It can be brought forward early within the plan period. Cygnus contains long-term tenancies of multiple occupiers. A flexible approach allowing delivery of Asiatic separately is supported. As a first phase, it ensures early housing delivery in the Church End Growth Area. Asiatic’s buildings are old, coming towards their end of life, reflecting the need for rationalisation of the business. Cygnus is modern and of adaptable size/ configuration for business requirements, thus not requiring early redevelopment.	The policy allows for the two sides of Dalmeyer Road to be considered together and ideally planned comprehensively together. Nevertheless, in terms of phasing it does identify the potential for Asiatic to come forward as a single entity in a first phase.	No Change.
5.5 South	BSSA1	Kelaty Properties LLP	Amount of dwellings identified: Welcome the allocation’s increased indicative capacity of 380 dwellings. This still fails to reflect the potential capacity. The site is within a Growth Area and will benefit from increases in PTAL related to the West London Orbital. Our masterplan provides and an indicative capacity of 450 homes; 80 bed care home; creative hub comprising flexible employment and SG uses, including film studios (11,200 sqm) and employment block with showroom on ground floor (4,500sqm; and 4 industrial blocks containing 11,100 sqm (on Cygnus Business Centre site). This doubles the total industrial floorspace. This takes account of 14 elements of LP policy D1B and is consistent with the draft Brent Local Plan and draft new London Plan. Paragraph 3.4.5 of the new London Plan states single aspect north facing flats should be	As set out in the Plan, the indicative capacity is just that and that it should neither be seen as a reason for justifying a scheme which is inconsistent with other policies, nor a limit on the potential capacity of a site where a well designed scheme that meets all policy objectives indicates that more development capacity can be achieved.	No Change.

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			“avoided”. The illustrative site layout contains no north facing single aspect flats and provides acceptable separation distances. It is a feasible and reliable basis for any Local Plan capacity. It is considered that New draft London Plan (consolidated changes version July 2019) Policy D1B presents a risk of refusal if a scheme delivers above the current draft Brent Local Plan indicative capacity. As such the capacity should be changed to 450 homes.		
5.5 South	BSSA2	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: There should be no issues concerning wastewater capacity. The developer and LBB should still liaise with Thames Water at the earliest opportunity to advise on phasing.	Noted. Likely requirement of water infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements.	No Change.
5.5 South	BSSA4	Legal & General	Proposed allocation welcomed in principle, but the following concerns: Indicative Residential Capacity. The indicative capacity of 200 dwellings equates to 64 dwellings per hectare based on the whole LSIS or 182 dwellings per hectare based on 35% of the site not being in industrial use. Such a low level risks non-efficient use of a brownfield site. A GLA Stage 1 Report for 18/3498 adjacent indicated 388 dwellings per hectare on that site was acceptable. A low indicative capacity creates risks at the planning application stage if a significantly higher number of dwellings is proposed. As such the indicative capacity should be increased to 300 dwellings. The allocation text should also state this is not be treated as a maximum.Supporting Community Facilities: No evidence of ‘need’ for community facilities has been provided taking into account other sites with capacity (which might be more appropriate) and any other facilities which are delivered in the future. The allocation needs to reflect this.	The capacity is only indicative at this stage. Application 18/3498, which was subject to extensive pre-app since 2016 and hence prior to the draft London Plan. Its deliverability is now less clear due to the need to better address industrial floorspace requirements and the relationships that it has with the adjacent lower residential adjacent properties. GLA policy have been clear about the need to address the borough's 'Provide Capacity' status as set out in the new London Plan. This sets a significant industrial floorspace target. In order to meet this target, and to comply with London Plan policy E7, designated industrial sites such as this will need to be intensified for industrial uses. This will put a limit on the amount of residential which can reasonably be achieved. Nevertheless, in the context of the existing application, 200 dwellings indicative does appear low, as such 300 is considered reasonable. The Plan already identifies that indicative dwelling numbers means just that and that the figure should neither prevent more dwellings if acceptable in all other policy respects, or justify a development that meets the target but is not policy compliant in other respects.Church End currently has a lack of community infrastructure. The appropriate locations for this will be outlined within the forthcoming masterplan. The site allocation includes this within its allocated uses so as to provide flexibility, and allow for its potential inclusion on this site, with the suitability of each area considered in relation to the need and making a proportionate contribution.	BSSA4 indicative capacity amend: " 200 <u>300</u> "BSSA4 timeframe for delivery amend: 5-10 years " <u>200</u> " 10+ years " 200 <u>100</u> ".
5.5 South	BSSA4	Legal & General	Supporting Community Facilities: No evidence of ‘need’ for community facilities has been provided taking into account other sites with capacity (which might be more	Church End currently has a lack of community infrastructure. The appropriate locations for this will be outlined within the forthcoming masterplan. The site allocation includes this	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			appropriate) and any other facilities which are delivered in the future. The allocation needs to reflect this.	within its allocated uses so as to provide flexibility, and allow for its potential inclusion on this site, with the suitability of each area considered in relation to the need and making a proportionate contribution.	
5.5 South	BSSA5	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste: There should be no issues concerning wastewater capacity. The developer and LBB should still liaise with Thames Water at the earliest opportunity to advise on phasing.	Noted. See proposed changes.	Include reference within Infrastructure Requirements need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan.
5.5 South	BSSA6	Wembley Towers Limited	Allocated non-residential uses should be identified as potential uses, subject to detailed feasibility and following consideration to need and demand (particularly in relation to the 'supporting community and cultural uses') at the time a development proposal is being formulated. To ensure the policy is effective Allocated Use should be revised to: "Residential, with potential for affordable workspace, supporting community and cultural uses and small-scale retail."	The suggested reference to allocated non-residential uses is considered appropriate. Until the extent of the development site that is available is known related to the flood assessment work, it is not clear of the potential to accommodate a range of uses associated with a mixed use community/ development.	No Change.
5.5 South	BSSA6	Wembley Towers Limited	The light industrial use is solely attached to Argenta House. The requirement for the re-provision of employment floorspace relates specifically to it and clarification is therefore required of this. The remainder does not have any land use restrictions. The allocated use refers to residential and affordable workspace uses. Affordable workspace provision (defined in Policy BE1 as minimum of 10% of total floorspace within major developments exceeding 3000 sqm) should only apply to Argenta House given it is a Local Employment Site. Given the potential for the site's regeneration, a mixture of appropriate uses should be included within the allocated use due to the need to activate the site and draw people through as a permeable route from Harrow Road to the station. Change text to "Part of the site contains a light industrial unit. Re-provision of affordable workspace within the part of the site occupied by Argenta House will be required to mitigate the loss of this unit".	In relation to the existing industrial use being related to Argenta House, this is true. Given the fact that both sites were effectively non-designated employment sites, the council considers it appropriate that on both sites, given the borough's provide capacity status that the allocation has the potential to accommodate employment floorspace in the form of affordable workspace as part of a mixed-use community. The mixture of uses suggested in the allocation is considered appropriate as part of the place-making linking between Harrow Road and the station if the flood work shows that development can be accommodated in the site.	BSSA6 Allocated Use amend: "Residential, <u>with potential for affordable workspace, supporting community and cultural uses and small scale retail</u> " BSSA6 Planning considerations amend: " <u>The site was until recently predominantly in employment use contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit.</u> The London Plan identifies Brent as a 'provide capacity' borough in terms of industrial employment floorspace, <u>and as such provision of some affordable workspace will be sought on site as part of the potential uses associated with a new mixed use community. an increase in employment floorspace will be sought.</u> "

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5.5 South	BSSA6	Wembley Towers Limited	The policy should be amended to indicate that provision of Build to Rent and Specialist Older People's Housing is encouraged on the site, subject to a detailed feasibility assessment, but not mandated. This clarification is necessary to ensure that the policy is sound and consistent with national policy. Amend to: "The site is of sufficient size to consider the incorporation of BH3 Build to Rent and BH8 Specialist Older People's Housing policy requirements, subject to a detailed feasibility assessment'.	Policy BH3 (Build to Rent) requires that schemes proposing over 500 dwellings have some element that comes forward as Build to rent unless the exceptions in the policy can be shown. Policy BH8 (Specialist Older Persons Housing) requires the provision of specialist older persons housing on sites delivering over 500 dwellings. Both policies with their supporting text set out sufficient flexibility to allow for site characteristics to be considered where such provision is not achievable.	No Change.
5.5 South	BSSA6	Wembley Towers Limited	The representation solely relates to Wembley Point, which has a prior approval for 439 dwellings permission for façade improvements and residential and office infill floorspace. The increase in indicative capacity is welcomed. It is recommended that the site allocation is clarified to confirm the indicative capacity of the site over the prior approval and 130 residential units for the Argenta House site. Detailed technical feasibility work is currently reviewing site constraints, including flood risk. The allocation considers that this area is suitable for tall buildings, subject to satisfactorily mitigating constraints, an opportunity exists to bring about enhanced place-making to significantly increase the capacity of the site.	The indicative capacity will be amended to incorporate the prior approval and the Argenta House application which planning committee was minded to approve in October 2019 subject to completion of a S106 obligation, with both totalling 569 dwellings. The further potential to accommodate development will be related to the extent of the site which can be shown through updated modelling agreed with the Environment Agency to be outside the functional floodplain. Until this has been done, the indicative capacity represents what is known that can be delivered.	BSSA6 Timeline for delivery amend: "0-5 years 440 569, 5-10 Years 100 "
5.5 South	BSSA6	Wembley Towers Limited	Effective delivery of public realm enhancements will be influenced by the separate ownerships of the Argenta House and Wembley Point sites. The Planning Considerations should be modified to: "It has a poor public realm which needs to be improved, subject to agreement being reached between the Council and landowners."	On the public realm aspects, it is agreed that improvements will be subject to agreements being reached between the Council and landowners.	BSSA6 Planning Considerations amend: "It has a poor public realm which needs to be improved, <u>subject to agreement being reached between the Council and landowners.</u> "
5.5 South	BSSA6	Wembley Towers Limited	The requirement for a car free development to be subject to a Controlled Parking Zone (CPZ) being achieved is unnecessarily inflexible as this is beyond the control of the developer. It should reasonably be supported without an existing CPZ subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment. Amend to: "With a PTAL of 4/3, the site is located within a 6-minute walk of Stonebridge Park Station, which is served by the overground and underground and within a 5-minute walk of 3 bus stops, each serviced by one bus. Car free development will be encouraged, subject to a Controlled Parking Zone being achieved or, alternatively, in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment'.	Policy BT2 states that car free development will be encouraged where an existing CPZ is in place, or can be achieved. This is seen as sufficiently flexible so as to allow car free development on sites where a CPZ is yet to be delivered.	BSSA6 Planning considerations amend: "...Car free development will be encouraged, subject to a Controlled Parking Zone being achieved <u>achievable</u> ..."
5.5 South	BSSA6	Stonebridge Real Estate Development	The representation solely relates to Wembley Point, which has a prior approval for 439 dwellings permission for façade improvements and residential and office infill floorspace. The increase in indicative capacity is welcomed. It is recommended that the site allocation is clarified to confirm the indicative capacity of the site over the prior approval and 130 residential units for the Argenta	The indicative capacity will be amended to incorporate the prior approval and the Argenta House application which planning committee was minded to approve in October 2019 subject to completion of a S106 obligation, with both totalling 569 dwellings. The further potential to accommodate development will be related to the extent of the site which	BSSA6 Timeline for delivery amend: "0-5 years 440 569, 5-10 Years 100 "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			House site. Detailed technical feasibility work is currently reviewing site constraints, including flood risk. The allocation considers that this area is suitable for tall buildings, subject to satisfactorily mitigating constraints, an opportunity exists to bring about enhanced place-making to significantly increase the capacity of the site.	can be shown through updated modelling agreed with the Environment Agency to be outside the functional floodplain. Until this has been done, the indicative capacity represents what is known that can be delivered.	
5.5 South	BSSA6	Stonebridge Real Estate Development	Allocated non-residential uses should be identified as potential uses, subject to detailed feasibility and following consideration to need and demand (particularly in relation to the ‘supporting community and cultural uses’) at the time a development proposal is being formulated. To ensure the policy is effective Allocated Use should be revised to: “Residential, with potential for affordable workspace, supporting community and cultural uses and small-scale retail.”	The suggested reference to allocated non-residential uses is considered appropriate. Until the extent of the development site that is available is known related to the flood assessment work, it is not clear of the potential to accommodate a range of uses associated with a mixed use community/ development.	No Change.
5.5 South	BSSA6	Stonebridge Real Estate Development	Effective delivery of public realm enhancements will be influenced by the separate ownerships of the Argenta House and Wembley Point sites. The Planning Considerations should be modified to: “It has a poor public realm which needs to be improved, subject to agreement being reached between the Council and landowners.”	On the public realm aspects, it is agreed that improvements will be subject to agreements being reached between the Council and landowners.	BSSA6 Planning Considerations amend: “It has a poor public realm which needs to be improved, <u>subject to agreement being reached between the Council and landowners.</u> ”
5.5 South	BSSA6	Stonebridge Real Estate Development	The light industrial use is solely attached to Argenta House. The requirement for the re-provision of employment floorspace relates specifically to it and clarification is therefore required of this. The remainder does not have any land use restrictions. The allocated use refers to residential and affordable workspace uses. Affordable workspace provision (defined in Policy BE1 as minimum of 10% of total floorspace within major developments exceeding 3000 sqm) should only apply to Argenta House given it is a Local Employment Site. Given the potential for the site’s regeneration, a mixture of appropriate uses should be included within the allocated use due to the need to activate the site and draw people through as a permeable route from Harrow Road to the station. Change text to “Part of the site contains a light industrial unit. Re-provision of affordable workspace within the part of the site occupied by Argenta House will be required to mitigate the loss of this unit”.	In relation to the existing industrial use being related to Argenta House, this is true. Given the fact that both sites were effectively non-designated employment sites, the council considers it appropriate that on both sites, given the borough’s provide capacity status that the allocation has the potential to accommodate employment floorspace in the form of affordable workspace as part of a mixed-use community. The mixture of uses suggested in the allocation is considered appropriate as part of the place-making linking between Harrow Road and the station if the flood work shows that development can be accommodated in the site.	BSSA6 Allocated Use amend: “Residential, <u>with potential for affordable workspace, supporting community and cultural uses and small scale retail</u> ” BSSA6 Planning considerations amend: “The site <u>was until recently predominantly in employment use contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit.</u> The London Plan identifies Brent as a ‘provide capacity’ borough in terms of industrial employment floorspace, <u>and as such provision of some affordable workspace will be sought on site as part of the potential uses associated with a new mixed use community. an increase in employment floorspace will be sought.</u> ”

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South	BSSA6	Stonebridge Real Estate Development	The requirement for a car free development to be subject to a Controlled Parking Zone (CPZ) being achieved is unnecessarily inflexible as this is beyond the control of the developer. It should reasonably be supported without an existing CPZ subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment. Amend to: "With a PTAL of 4/3, the site is located within a 6-minute walk of Stonebridge Park Station, which is served by the overground and underground and within a 5-minute walk of 3 bus stops, each serviced by one bus. Car free development will be encouraged, subject to a Controlled Parking Zone being achieved or, alternatively, in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment'.	Policy BT2 states that car free development will be encouraged where an existing CPZ is in place, or can be achieved. This is seen as sufficiently flexible so as to allow car free development on sites where a CPZ is yet to be delivered.	BSSA6 Planning considerations amend: "...Car free development will be encouraged, subject to a Controlled Parking Zone being achieved <u>achievable</u> ..."
5.5 South	BSSA6	Stonebridge Real Estate Development	The policy should be amended to indicate that provision of Build to Rent and Specialist Older People's Housing is encouraged on the site, subject to a detailed feasibility assessment, but not mandated. This clarification is necessary to ensure that the policy is sound and consistent with national policy. Amend to: "The site is of sufficient size to consider the incorporation of BH3 Build to Rent and BH8 Specialist Older People's Housing policy requirements, subject to a detailed feasibility assessment'.	Policy BH3 (Build to Rent) requires that schemes proposing over 500 dwellings have some element that comes forward as Build to rent unless the exceptions in the policy can be shown. Policy BH8 (Specialist Older Persons Housing) requires the provision of specialist older persons housing on sites delivering over 500 dwellings. Both policies with their supporting text set out sufficient flexibility to allow for site characteristics to be considered where such provision is not achievable.	No Change.
5.5 South	BSSA7	Sports England	Welcomes new leisure centre allocation and reference to the need being identified within Brent's Indoor Sports and Leisure Needs Assessment.	Support welcomed.	No Change.
5.5 South	BSSA7	Stonebridge Real Estate Development	The overall allocation of this site is strongly supported. The allocated uses should be identified as potential uses, subject to detailed feasibility and following consideration to need and demand (particularly in relation to the 'small scale commercial and community uses') at the time a development proposal is being formulated. Amend policy: 'Allocated Use: New leisure centre, hotel, office, residential, and with potential for small scale commercial and community uses.' The site's acceptability for visitor accommodation is recognised by the Site Allocation which includes hotel use and is therefore consistent with Policy BE9.	Noted. The allocated uses the Council sees as appropriate given the extensive discussions regarding the site, and public consultation to date. If a proposal deviates from the desired uses, its relative merit will be assessed upon application. Given the scheme is to be delivered jointly with the Council as partner, it is expected that these uses will be included within any proposal.	No Change.
5.5 South	BSSA7	Stonebridge Real Estate Development	The indicative capacity should take account of detailed analysis undertaken to date, which could provide for up to 1,000 new homes.	The capacity is indicative only. If it can be robustly demonstrated that higher densities can be achieved without compromising on other desired development outcomes, it may be considered appropriate.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South	BSSA7	Stonebridge Real Estate Development	The requirement for a car free development to be subject to a Controlled Parking Zone (CPZ) is unnecessarily inflexible. A CPZ can only be delivered by the Council. Car free or limited ('car-lite') parking development in a PTAL 4 area without a CPZ should reasonably be supported subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment. Amend policy to: "Car free development will be encouraged, subject to a Controlled Parking Zone being achieved or, alternatively, in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment."	Policy BT2 states that car free development will be encouraged where an existing CPZ is in place, or can be achieved. This is seen as sufficiently flexible so as to allow car free development on sites where a CPZ is yet to be delivered.	BSSA7 Planning considerations amend: "...Car free development will be encouraged, subject to a Controlled Parking Zone being achieved <u>achievable</u> ..."
5.5 South	BSSA7	Stonebridge Real Estate Development	For consistency, clarification is required in the allocation wording to state that the site falls within a Tall Building Zone (Policy BD2) and therefore is suitable for tall buildings. Amend Design Principles to: "In this context higher density development is appropriate and it is considered that this area is suitable for tall buildings, subject to being of high architectural quality, providing a high standard of amenity and respecting local character'.	Reference to the site being in a Tall Buildings Zone is appropriate.	BSSA7 Design Principles amend: "..... <u>The site has been identified as part of a Tall Buildings Zone.</u> In this context higher density development is appropriate and it is considered that this area is suitable for tall buildings, subject to being of high architectural quality, and providing a high standard of amenity <u>and respecting local character'</u>
5.5 South	BSSA7	Stonebridge Real Estate Development	The wording should be clarified to indicate that the provision of Build to Rent and Specialist Older People's Housing is encouraged on the site, subject to a detailed feasibility assessment, but not mandated. This clarification is necessary to ensure that the policy is sound and consistent with national policy. Amend planning considerations to: "Site is of sufficient size to consider the incorporation of BH3 Build to Rent and BH8 Specialist Older People's Housing policy requirements, subject to a detailed feasibility assessment'.	Policy BH3 (Build to Rent) requires that schemes proposing over 500 dwellings come forward as Build to rent. Policy BH8 (Specialist Older Persons Housing) requires the provision of specialist older persons housing on sites delivering over 500 dwellings. Both policies with their supporting text set out sufficient flexibility to allow for site characteristics to be considered where such provision is not achievable.	No Change.
5.5 South	BSSA7	GLA	The site currently has an operational breakers yard, an identified waste use. As such waste operations should be protected and if re-provided should be of equal size and operational capacity.	Noted. This site is not identified as being of strategic significance in the West London Waste Plan. The redevelopment of the site is seeking to maximise community benefit through the re-provision of a significantly larger leisure facility, plus a substantial amount of residential to meet Brent's housing needs. It has required the purchase of land-holdings by the council in order to create a comprehensive development. Taking this into account, it is not considered that it would be appropriate to re-provide the waste facility on site. Employment space to support small business development will be provided within the Bridge Park leisure facility.	No Change.
5.5 South	BSSA7	Thames water	Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. Likely requirement of wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements. London Plan policy requirements on surface water drainage apply to all major developments. Flood risk issues are highlighted under planning considerations.	No change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South	Blank South	Thersa	Noticed funding had been made available to the Jewish cemetery... could you do something to help St Mary's, Neasden Lane, the Mediaeval Church (from where Church End gets its name) that has been there for over 1000 years. Sure they would appreciate it. It should be Brent's crowning glory, but it seems to be overlooked and ignored. More should be done to celebrate its history, beauty etc.	Noted. The Heritage Lottery Fund has been awarded to Brent to open up the Willesden Jewish Cemetery to the public. The Council does not have any plans for St. Mary's Church or is aware of other groups seeking funding. Should a group identify a potential project the council will consider this and the potential for supporting a bid for Heritage Lottery funding.	No change

5.6 SOUTH EAST

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.5 South & 5.6 South East	Para 5-5-13- BP6- 5-6-12	Elana Gal-Edd	The rationale for Willesden Green High Road being identified as an intensification corridor was given as its large number of empty shops at one of the consultation events. There are actually few empty properties, but is a strong ethnic character catering for Middle Eastern, Polish, West Indian, Indian and Brazilian/Portuguese communities. It has historic landmarks such as Edward's Bakery. A local shopping area, it caters for daily needs and should stay. The former Case is Altered pub lost its unique historic name and pub sign, and the red brick building was allowed to be painted in black. Houses along Willesden High Road are attractive period terraces, much like those in the conservation area further east. It would be criminal to destroy these terraces and deprive the area of its character and heritage. As to the proposed height, firstly the High Road is too narrow to accommodate five storey building and secondly the terraces on the High Road back on to two storey terraces and would impinge upon them. Please reconsider the intensification plan and allow the area to develop organically.	Noted. The Brent Retail and Leisure Needs Assessment notes that Willesden has one of the highest vacancy rates of all Brent Town Centres. The majority of this is located to the west of the Town Centre. It was determined that in order to increase the vitality and viability of the Town Centre, that it should be rationalised, and consolidated into its more viable eastern centre. This is part of the rationale for the designation of the Intensification Corridors. These have also been identified due to road having an appropriately wide road width, good access to public transport and amenities etc.. The increased provision of homes will assist in meeting identified housing needs, and will support the local centre by increasing footfall. It does have a relatively strong ethnic food offer, however, the local centre of Harlesden has a more significant draw from this area in this regard. In corridors which have existing non-residential uses, as is the case here, the Council will look to retain the floorspace on this site if viable, or other appropriate non-residential uses as is aligned with the Plan. The majority of the area will remain untouched. In order to meet the significant housing targets set by the London Plan, and the presumption in favour of small site development, it was seen as necessary to direct housing toward appropriate locations. Many of these units have been inappropriately subdivided, and represent poor living conditions for inhabitants. Redevelopment will help bring the homes up to standard in this respect. The resulting development will have to be of high quality design, and sympathetic to local character, ensuring local heritage is not compromised. At 15m, the road width is seen as sufficient to accommodate buildings up to 5 storeys. The same is true for the distance from the residential amenity to the rear. To allow development to come forward organically would not prepare positively for the growth required by regional and national policy. This would result in piecemeal development, coming forward without coherence and would lend itself to development in inappropriate, unsustainable locations.	No Change.
5.6 South East	BP6	Ravensale Limited	Criterion q) does not do enough to protect neighbouring residential properties. It needs to recognise only employment uses not harming neighbouring residential properties will be acceptable. It should refer to land on the west side of Hassop Road being suitable for B1 uses (including offices), as well as suitable B2 and B8 uses.	It is considered that the policy sufficiently identifies the need to address potential adverse impacts on neighbouring residential. The developments will be subject to other policies that seek to protect neighbours amenities, as well as considering the 'agent of change' for any new uses that might impact on future industrial occupiers. The reference to industrial as proposed in a modification to BP6 q) is consistent with policy and supports a wider range of uses which are likely to be more compatible with neighbours.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.6 South East	BP6	Sports England	BP6 seeks to protect and enhance playing pitches, however, NPPF paragraph 97 and Sports England policy require the protection of the playing 'field' which goes beyond the pitch. Therefore the wording should be amended to 'playing field'.	This is fair and as such the text shall be amended.	BP6 amend: "m) Enhance and protect playing fields pitches at Gladstone Park and....."
5.6 South East	BP6	TfL Commercial Development	Support identification of the South Kilburn Growth area as a Tall Building Zone where consistent with the South Kilburn Masterplan. This area includes BSESA34, a site adjacent to a transport hub with a high PTAL and should therefore be optimised.	Support welcomed. It should however be noted that existing heritage assets in close proximity to the station will limit the height that is appropriate on that site if it is redeveloped.	No Change.
5.6 South East	Para 5-6-24- 5-6-25	Robin Sharp	Understates the value and long-term sustainability of the Queen's Park area. Whilst housing costs are very high, this reflects that the type of housing and its density clustered around the Park (not the Salusbury Road facilities by the way) constitute a very acceptable form of living. An iconic photograph of the Park with the bandstand should be featured in the Local Plan. The area is represented by a strong residents' association.2. There is no explanation of any plans for conservation areas except in relation to Mapesbury. Some clarification is needed.	Noted. See proposed changes.	Paragraph 5.6.11 amend: ".....The proposed extension to the <u>Mapesbury, Kensal Green, Queen's Park, Brondesbury, Kilburn, and Willesden Green</u> conservation areas, <u>plus potential new ones for Kensal Rise, Kilburn Lane and Malvern Road</u> boundary to include parts of Cricklewood Town Centre reflects the distinct and special character of these areas as outlined in the Brent Heritage Study....."
5.6 South East	Para 5-6-24- 5-6-25	Robin Sharp	1. Queen's Park Creative Quarter is in Lonsdale Road (NOT Avenue). Cannot see this mapped.	Noted. See proposed change. The Creative Quarters are featured on the policies map. The Place maps provide a broad overview of the spatial designations within each Place. Given their limited size, and the overlapping nature of spatial designations, it would not be appropriate to include other designations as it would reduce its clarity.	Paragraph 5.6.5 amend: " <u>Lonsdale Avenue Road</u> "
5.6 South East	Para 5-6-24- 5-6-25	Robin Sharp	3. 5.6.24 refers to a lack of orbital links but seems to ignore the North London Line (Richmond to Stratford). This should be heralded.	Noted. See proposed change.	Paragraph 5.6.8 amend: "The London Overground travels through this place <u>providing an orbital route linking Richmond/Clapham Junction and Stratford,.....</u> "
5.6 South East	Para 5-6-24- 5-6-25	Robin Sharp	4. 5.6.25 refers to reducing car dominance on the A5 but for air quality and climate change reasons. Car commuting needs reduction on all the routes mentioned and care taken to avoid displacement. 5. References to trees planting improving air quality are misplaced. Brent Breathes explains they don't, though they are good for carbon capture, wildlife and a desirable public realm.	Paragraph 5.6.25 notes that the heavy traffic on the A5 creates an unattractive environment for residents and businesses, as well as stating the benefits of improving the public domain for air quality purposes. The paragraph makes particular reference to the A5 due to its significance and particular traffic problems. The Council's strategy, as outlined in policies BT1 and BT2 is to reduce reliance on personal vehicles and increase the use of more sustainable transport modes. This will benefit all roads within Brent. Trees provide an important role in the filtration of particulate matter from the air. Although street trees alone are not sufficient so as to solve air quality problems, they will help. They will also improve the public realm, helping to increase active travel uptake and reduce car dependence, which itself will assist in the improvement of air quality.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.6 South East	Para 5-6-24- 5-6-25	Robin Sharp	6. Plan assumes too readily great success of South Kilburn redevelopment. Densities are too high and green space insufficient – not Brent’s fault but of HM Treasury withdrawing subsidy from new social housing.	The South Kilburn estate regeneration programme is in mid-phase delivery. The majority of residents voted in favour of its continued regeneration at the end of 2019 due to the successes of already developed plots. The scheme will help regenerate the area whilst delivering essential housing, including affordable housing. This will help us achieve the ambitious London Plan housing target, which requires the efficient use of land in the delivery of homes, resulting in the high density development of brownfield land. If these sites were not effectively utilised, capacity would have to be met elsewhere, such as on open space land which is not desirable, nor in line with London Plan policy. Green space in the area is being reprovided with increased utility, along with a number of pocket parks.	No Change.
5.6 South East	BSESA1	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. Likely requirement of Water and wastewater infrastructure upgrades, and need to liaise at earliest opportunity with Thames Water to agree upon a housing and infrastructure phasing plan included within Infrastructure requirements. London Plan policy requirements on surface water drainage apply to all major developments. The need to address flooding concerns is stated within the Planning Considerations section.	No Change.
5.6 South East	BSESA3	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste water: Network capacity may be unable to support anticipated demand from this development. Local upgrades may be required to ensure sufficient capacity ahead of development. Where there is a potential capacity constraint, developer liaison will be needed to determine whether a detailed drainage strategy identifying what infrastructure, where, when and how it will be delivered is required. If so, this will need to be submitted with the planning application.	Noted. This is set out in the infrastructure requirements.	No Change.
5.6 South East	BSESA5	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste water: Network capacity may be unable to support anticipated demand from this development. Local upgrades may be required to ensure sufficient capacity ahead of development. Where there is a potential capacity constraint, developer liaison will be needed to determine whether a detailed drainage strategy identifying what infrastructure, where, when and how it will be delivered is required. If so, this will need to be submitted with the planning application.	Noted. This is set out in the infrastructure requirements.	No Change.

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5.6 South East	BSESA7	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste water: Network capacity may be unable to support anticipated demand from this development. Local upgrades may be required to ensure sufficient capacity ahead of development. Where there is a potential capacity constraint, developer liaison will be needed to determine whether a detailed drainage strategy identifying what infrastructure, where, when and how it will be delivered is required. If so, this will need to be submitted with the planning application.	Noted. This is set out in the infrastructure requirements.	No Change.
5.6 South East	BSESA9	Sports England	To ensure compliance with NPPF the on-site MUGA should be retained, but preferably enhanced. This was iterated at Reg 18 stage, and the Consultation statement agreed this would be included, with reference to a community access agreement. This should be followed through as previously stated in the planning consideration section follows: " 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."	Noted. The text referred to has been included within SSA BSESA12 which is where the existing school facilities are to be re-provided. This is the appropriate location for this text.	No Change.
5.6 South East	BSESA10	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. This is already set out appropriately in the site's infrastructure requirements.	No Change.
5.6 South East	BSESA12	GLA	Site allocation boundary does not follow existing built form pattern. If intentional, this should be made clear. Brent's Open Space Assessment identifies Kilburn and adjacent Queens Park wards as being deficient in access to a nearby park in. This site is part of a series of land swaps. There is no evidence to support allocation BSESA9 stating that there will be no resulting overall loss of open space. The reconfiguration does not address the overall deficiency to access to nearby parks.	The South Kilburn Growth Area is subject to an existing masterplan, which is reflective of the site allocation boundaries. The existing development ignored the historic street pattern, which is something the new allocations seek to replace. The masterplan sought to maximise the utility of the land. The phasing of the masterplan will allow for such development to come forward sustainably. Existing residents will be decanted as necessary in appropriate temporary accommodation. The land swap will result in a more suitable park, or a better size, with better overlooking, amenity and facilities in a better location, which will be more heavily utilised. Due to competing pressures on the limited available land, including the need to accommodate 50% dwellings at social rents it was not possible to increase the quantum of	No Change.

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				park land in this area. The masterplan area will include other open space typologies, including pocket parks. This is seen to bring the area broadly in line with the London Plan. The Masterplan for the area is in its mid phases. This was voted on by our residents in late 2019 receiving considerable support. It will not be possible to re-orient the plans for the site so as to bring the park up to standards at this stage.	
5.6 South East	BSESA12	Thames water	Water: Information provided does not enable us to make a detailed assessment of potential impact. To do this we will need specific detail on the Council's aspirations for the site. This should include the location, type and scale of development on this site. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. The site requires investment in community uses, including a school, nursery and community space. This will determine and limit the extent of residential provided on site. This is not anticipated to be significant. The need to liaise with Thames Water at an early stage is included within the Infrastructure Requirements. . For consistency's sake, the wording can be amended to that found within other site allocations on this matter. London Plan policy requirements on surface water drainage apply to all major developments.	BSESA12 Infrastructure requirements amend: "...Thames Water will need to be engaged to establish impact on water supply network and watertreatment infrastructure 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... "
5.6 South East	BSESA14	Thames water	Water: the scale of development is likely to require upgrades to the water supply network, and as such the developer and LBB should liaise with Thames Water at the earliest opportunity to agree a phasing plan. Failure to do so will increase the need for planning conditions being sought to control phasing. This should include a housing phasing plan stating what phasing may be necessary to ensure development does not outpace capacity improvement works. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. This matter is sufficiently addressed in infrastructure requirements.	No Change.
5.6 South East	BSESA16	Thames water	Water: Information provided does not enable us to make a detailed assessment of potential impact. To do this we will need specific detail on the Council's aspirations for the site. This should include the location, type and scale of development on this site. Waste: The wastewater network capacity in this area may be unable to support demand, and requiring upgrades to drainage infrastructure. The developer should liaise with Thames Water to determine if a drainage strategy is necessary, stating where, when and how it will be delivered. This should be submitted with the application.	Noted. See proposed changes. The site requires investment in community uses. This will determine and limit the extent of residential provided on site. This is not anticipated to be significant. London Plan policy requirements on surface water drainage apply to all major developments.	BSESA16 Infrastructure Requirements amend: "...Thames Water has indicated the scale of development could require upgrades to water supply capacity and 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."

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5.6 South East	BSESA18	Ravensale Limited	<p>The draft policy under-estimates the site's potential to provide high density development; placing unnecessary restrictions that conflict with the NPPF and draft London Plan's requirement for intensification in highly sustainable locations. It also encourages a full range of industrial uses (e.g. B1c, B2 and B8) that will not improve the area's environmental quality, nor amenity impacts on adjoining residential properties (purported to be a key objective of Policy BSESA18 and Policy BP6). The site owner's initial investigations potential to accommodate over 100 dwelling (possibly up to 200). The timescale of which is likely to be sooner than specified in the policy, with 50% in the first 5 years and the remainder in the next 5. The policy erroneously refers to 'Policy B6(p)', when it should be referring to 'Policy BP6(q)'. Policy BSESA18's is far more onerous than that of Policy BP6 (the latter merely supports removal of vehicle workshops on Hassop Road, whereas the former specifically requires their removal). In addition, B1a (offices) should be encouraged given the site's close proximity to nearby residential properties and given the policy's desire to "improve amenity for neighbouring residential units". Design Principles: The policy should go further in promoting suitably designed taller building heights in this highly sustainable town centre location. Justification: The range of uses deemed acceptable on the site should be expanded to: "...including housing and/or other forms of residential accommodation would help support the vitality of the town centre and meet a local housing need."</p>	<p>The identified capacity is indicative only. It also reflects the town centre location of the site where a multiplicity of uses could be achieved as part of a mixed use scheme. If the upper floors were to be wholly residential then it is agreed that the indicative capacity could be larger. Pre-application discussions however have featured a mix of uses, with a scale out of context to that which the Council is comfortable with. Thus the indicative target is seen as appropriate. If it can be shown, through a design-led approach, that higher densities can be achieved in accordance with the policies with this Plan, the London Plan and the NPPF, then there is sufficient flexibility in the policy to allow this to occur. The Council will require greater justification to identify delivery within the first 5 years, consistent with that sought in NPPF and the NPPG. Else there is a risk to the Council if identified in a delivery target for the purposes of monitoring the Local Plan that the Council is over-ambitious, with consequent issues of not being able to identify a 5 year supply of available sites. Brent has been identified within the London Plan as a 'Provide Capacity' borough and has been set significant industrial floorspace targets accordingly. Policy E7 of the London Plan in this context does not support the release of industrial sites and policy BE3 sets out tests for Local Employment Sites. The allocation includes vehicle repair garages and other industrial premises on Hassops Road. In order to meet the targets industrial/ employment floorspace will at the very least need to be retained, and ideally intensified. In order to come forward sustainably this will have to be in accordance with DMP1 and other associated policies with regards to its impact on surrounding existing/ proposed uses. The requirements within BSESA18 require the re-provision/intensification of employment uses which are appropriate to co-locate alongside residential, so as to improve amenity upon existing, as does part q) of policy BP6. Given its surrounding context, including conservation area, the heights identified in the policy are regarded as appropriate. B1 office will be appropriate on the allocation, except if this is at the expense of industrial floorspace, as this would be inconsistent with Brent's provide capacity status.</p>	<p>Policy B6 amend" "q) The conversion of vehicle repair premises on Hassop Road to <u>employment industrial</u> uses which improve amenity for neighbouring residential units will be supported....." Policy BSESA18 planning considerations amend: "Policy B6 (p) promotes the conversion of premises on Hassop Road to <u>employment industrial</u> uses which improve amenity for neighbouring residential <u>units properties</u>."</p>

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5.6 South East	BSESA18	Thames water	Water supply: No concerns in relation to this development. Developer and Local Planning Authority should liaise with Thames Water at the earliest opportunity to advise on the development's phasing. Waste water: Network capacity may be unable to support anticipated demand from this development. Local upgrades may be required to ensure sufficient capacity ahead of development. Where there is a potential capacity constraint, developer liaison will be needed to determine whether a detailed drainage strategy identifying what infrastructure, where, when and how it will be delivered is required. If so, this will need to be submitted with the planning application.	Noted. See proposed changes. London Plan policy requirements on surface water drainage apply to all major developments.	BSESA16 Infrastructure Requirements amend: " <u>Thames Water has indicated the scale of development could require upgrades to water supply capacity and 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.</u> "
5.6 South East	BSESA19	Theatres Trust	Support site allocation. Design Principles needs amending to requiring Theatres Trust to be engaged. Consistency of approach with the position for site BNSA4, where the views of Historic England and the Cinema Theatre Association should be reflected.	Noted. The requirement for the Theatres Trust to be engaged at an early stage has been included within the Planning Considerations section. This is seen as appropriate and sufficient.	No Change.
5.6 South East	BSESA34	TfL Commercial Development	Support for allocated uses of station, commercial and residential. Reps given in reg 18 requested a higher indicative capacity than 12 which the Council responded saying in the absence of a capacity study supported by a heritage statement, 12 units is considered appropriate and will therefore not be changed. However, the capacity now states unknown. Therefore the Consultation Statement and Reg 19 document are inconsistent and indicative capacity for the site unclear. We request the word unknown is removed and the site allocated for higher density development to be determined in regards to its context, in line with DNLP policy D1B.	The capacity will amended to 20. This is on the basis of 3 storeys above with some development to the rear with all dwellings dual aspect. This would represent 210 dwellings per hectare, which is a reasonable assumption given the adjacent heritage assets. As indicated elsewhere, it should neither be seen as a ceiling, nor a minimum if good design/ policy requirements indicate more/less can be provided on site.	BSESA34 Indicative Homes amend: " <u>Unknown 20</u> "
5.6 South East	Blank South East	Andrea Diez	Empty properties should be demolished and redeveloped. This is especially required in Willesden Green, Queens Park, Brondesbury Park, South Kilburn and Kensal Green.	Noted. Vacant buildings are likely the result of its current designated use being unviable, or a result of its general aesthetic quality. These units are likely situated within peripheral town centre sites. Policy BE5 notes that the conversion into community, office or residential uses will be supported in this instance. The Plan has also allocated sites for development. A number of these have been on the grounds of low occupancy or vacancy.	No Change.
5.6 South East	Blank South East	Elana Gal-Edd	Chaplin Road, Villiers Road , Deacon Road northwest of Belton Road and the north-western section of Chapter Road have been placed in the south plan as part of Church End Ward. They belong to Willesden Green Ward and should therefore be in the South East plan.	Noted. The Places have not been determined by ward boundaries, although in part they may follow them. They have been determined by a variety of factors, principally town centre catchments and other aspects of general character. The Places assist in helping manage the development of the borough. The Borough will still be considered as a whole. This is supported by London Plan policy, aligning with Good Growth Policy GG1 which seeks to build strong and inclusive communities through the setting of policies that respond to local circumstance.	No Change.

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5.6 South East	Blank South East	David Walton	<p>South Kilburn Open Space is a large green space which provides the only significant piece of green space within South Kilburn, one of the most diverse and densely populated areas in the UK, coming in the top 10% deprived areas also. Retention of land will enable almost all residents within South Kilburn to be ~400m from a large (2ha) green space as is Council policy, bringing with it multi-faceted benefits for the community. Space should be designated as Local Green Space as can be achieved by Local support via the NPPF, a feat that has only been achieved by the residents of Sudbury in identifying Vale Farm. The space meets NPPF criteria in that it is: in close proximity to the community it serves; demonstrably special to the community on the grounds of beauty, historic significance, recreational value, tranquillity, richness of wildlife, pollution control, sustainable flood prevention due to woodland, fire assembly point, and makes up for otherwise deficient area; and is local in character (not an extensive tract of land). It is in light of recent open space development of the Granville Road Public Open Space, and the proposed development plans for the Cathedral Walk linear park, which i make these comments. The park should be protected from such inappropriate development. DNLP policy G4 also supports this.</p>	<p>Noted. The newly revised South Kilburn Supplementary Planning Document provides the framework for development within the South Kilburn Growth Area. In accordance with the document, the Local Plan, under paragraph 5.6.29 states that there will be no net loss of open space. Policy BSEGA1 goes further and states that South Kilburn Park will be extended and enhanced. The scheme will involve the relocation of the Kilburn Park School Foundation to the East into allocation BSESA12. The school (BSESA9) will be converted back into open space, resulting in no net loss. This will create a more regular shaped park, which can be better utilised, feel more secure, and have a higher profile in the public's consciousness. The site will then be reinstated as Open Space in line with the existing park and will therefore be protected from development under London Plan policy G4. In addition to this, under policy BSEGA1, additional public open space will be provided on proposed/ existing developments, with some coming forward to replace that which has been developed, such as the Granville Road open space. Until these processes have been completed, it is not considered appropriate to designate this space as Local Green Space in the Local Plan as it will introduce additional potentially restrictive policy tests to areas that have been identified as being subject to extensive change.</p>	No Change.

5.7 SOUTH WEST

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5.7 South West	Para 5-7-11	Sudbury Town Residents Association	<ul style="list-style-type: none"> Clarification that the night-time economy of Sudbury Town has been created by incorrect licensing of betting shops and 24-hour retail liquor licenses and 24-hour fast food outlets, creating an unpleasant and anti-social environment. These are contrary to the Sudbury Town Neighbourhood Plan. A commitment to remove the inappropriate licensing and encourage sustainable Ground Floor Space use in the High Street in line with Sudbury Town Neighbourhood Policies TCU1 and TCD1. 	<ul style="list-style-type: none"> The licensing of betting shops, 24 hour liquor licences and 24 hour fast food outlets is not a material planning consideration. Policy BE5 seeks to restrict the proliferation of betting shops, adult gaming centres, pawnbrokers, take-aways, and shisha cafes. Night-time economy refers to all economic activity taking place between 6pm and 6am. The night time economy will be supported across the borough in accordance with draft London Plan policy HC6. Sudbury will not however be prioritised for this, with delivery being pushed toward the town centres of Wembley, Kilburn, Cricklewood and Wembley Park. 	No Change.
5.7 South West	Para 5-7-11	John Cox	Paragraph 5.7.11 should be "Sudbury & Harrow Road station".	Amend name of station.	Paragraph 5.7.11 amend: '...Sudbury & Harrow <u>Road</u> rail station.....'.
5.7 South West	BP7	Woolbro Homes	Woolbro supports the part of policy BP7. Woolbro challenge part 'e – homes'. Here, in relation to the Alperton Growth Area, the policy states: "Where alternative uses are co-located on industrial sites this will be as part of a comprehensive regeneration scheme which ensures no net loss of industrial floorspace." For the reasons set out above to site specific allocation BSWA6, Woolbro consider reference to 'no net loss' should be amended on the basis that it does not appear to be justified in terms of meeting wider existing stated development goals in this Housing Growth Zone. Suggested change: " e) ... regeneration scheme which ensures no net loss re-provision of industrial within the ground floors of the new buildings."	<p>Support noted.</p> <p>The new draft London plan identifies Brent as a 'provide industrial capacity' borough. Boroughs in the 'provide capacity' category are where strategic demand for industrial, logistics and related uses is anticipated to be strongest, and are required to seek to deliver intensified floorspace capacity in either existing or new locations accessible. Given this, the Council maintains that there should be no net loss of industrial floorspace and considers that this is not incompatible with other housing priorities (specifically, housing provision due to being a Housing Zone).</p>	No Change.
5.7 South West	BP7	St. George	Proposed modification: CHARACTER, HERITAGE AND DESIGN (b) Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton. and Elsewhere in the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road tall buildings where around 15 metres (5-storeys) could be appropriate and. In Sudbury and Ealing Road town centres where buildings around 15-18 metres (5-6 storeys) could be appropriate. Reasoning: The policy drafting is ambiguous and could be read to suggest that only 5 storeys would be acceptable in the Alperton Growth Area. The Council has approved a range of tall buildings at Grand Union (up to 25 storeys). Supported by the Brent Tall Building Strategy 2019: "The majority of Brent is low rise, with taller buildings in key locations including Wembley, Alperton and South Kilburn." Alperton is part of the top five "largest cluster of existing and permitted tall buildings over 30m."	<p>Agreed, the heights noted in paragraph b) refer to potential heights within the intensification corridors mentioned, and not the Alperton and Wembley Growth Areas' Tall Buildings Zones.</p> <p>With regard to labelling the potential building heights in intensification corridors as tall buildings, the policy recognises the need for intensification and ensuring that tall buildings are focussed in specific areas in order to respect the low-rise character of Sudbury and Wembley. Wembley and Alperton both have designated tall building zones. As the Tall Building Strategy notes, what is considered to be a tall building is dependent on local context. As such, the council does not consider it justified or necessary to classify potential buildings within the intensification corridors as being tall or not.</p>	BP7 Criterion b) amend: "Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton <u>and in intensification corridors.</u> and In the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road <u>buildings</u> where around 15 metres (5-storeys) could be appropriate and in Sudbury and Ealing Road town centres where <u>buildings</u> around 15-18 metres (5-6 storeys) could be appropriate."

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5.7 South West	BP7	Sudbury Town Residents Association	<p>Policy BP7 • CHARACTER, HERITAGE AND DESIGN states:b) Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton and elsewhere in the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road where around 15 metres (5-storeys) could be appropriate and Sudbury and Ealing Road town centres where around 15-18 metres (5-6 storeys) could be appropriate. comment: This part of the Policy is confusing and contradictory. Sudbury Town Neighbourhood Plan page 46 clearly states that development should not be greater than 2-3 storeys high to retain the low-rise character of Sudbury Town. This includes the High Street. The Council has ignored STRA and our Neighbourhood Forum Petition signed by 517 persons, who objected to Intensification Corridors along the Harrow Road, Watford Road and Bridgewater Road in January 2019. The Council has continued to propose this for the Sudbury Town area against the vote of the those that live and work within the Neighbourhood Forum Area. • COMMUNITY AND CULTURAL FACILITIESn) Improvement and enhancement of the Vale Farm and its Sports CentreThis statement undermines the Sudbury Town Neighbourhood Plan Policy VF1:Improvements to Vale Farm should not result in the loss of green or open space. Change of use and development other than for uses which support recreation, sporting and amenity use will not be permitted at Vale Farm.comment: Therefore, there should be no development on Vale Farm other than for the purpose of improvement of sports facilities. Brent has the highest obesity in the UK and the Neighbourhood Plan wants to protect this land from development to encourage our children to lead healthy and active lives. • South West 5.7.15 states: Outside these regeneration areas building height will be more reflective of the local context. Town centres (around 18 metres 6 storeys) and intensification corridors (around 15 metres/ 5 storeys) will provide the opportunity for some additional height. Elsewhere development will be expected to come forward at levels not significantly higher than existing two and three storey developments. comment: Sudbury Town is not a Town Centre but a Local Centre, therefore this does not apply. The Council have ignored the Sudbury Town Neighbourhood Plan guideline on page 46:proposals for any new development be in the order of two to three storeys high.</p>	<p>The Council has had to prioritise areas for development to meet housing needs as required by the national policy and the London Plan. Sudbury has very good public transport accessibility, particularly around the town centre, whilst accessibility along the proposed intensification corridors is also good. Although most is two-three storey the area has taller buildings in parts and very limited designated heritage assets. Although it is subject to a neighbourhood plan, the Sudbury plan contains no policies on heights of buildings or character. In the context of the contents of the emerging London Plan, which identifies that there is an expectation that character in some areas should be subject to change to accommodate growth, there are limited impediments to it being identified as a priority area for intensification. Nevertheless, it is considered that the policies in the emerging Plan seek <u>to</u> limit impact on the character of the majority of Sudbury, whilst for some parts it is anticipated that the character will change. In the context of how the borough has to accommodate the population's growth, this is considered an appropriate response.</p>	No Change.
5.7 South West	BP7	Sudbury Town Residents Association	<p>Removal of any reference to development of Vale Farm to be compliant with the Sudbury Town Neighbourhood Plan Policy VF1. Brent has the highest obesity levels in the UK and we need to save our sports land and encourage people to lead healthy and active lives.</p>	<p>Vale Farm: The draft Local Plan recognises the opportunities for improvement and enhancement of Vale Farm Sports Centre (Policy BP7 (n)) for sports and leisure uses. The Council also supports STRA's ambition for improvements and recognises in the Local Plan that it will explore all options of how this can be achieved within the financial parameters available to it (5.7.25). The open space at Vale Farm is identified as a Local Green Space.</p>	No Change.

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				This designation is equivalent to Green Belt in national policy in terms of its level of protection (5.7.26).	
5.7 South West	BP7	TfL Commercial Development	TfL CD supports the provision of high-density development within both the Wembley and Alperton Growth Areas, especially in locations close to transport infrastructure and within town centres in Policy BP7. • TfL CD remains of the view that a limit of five to six storeys for town centre development under Policy BP7 Part (b) is unnecessarily restrictive. The suggested height would not support the optimal development of sites in this area. • Reasoning: o TFL considers the response to the consultation statement as a failure to acknowledge the site as a prime location for development as it does not consider its local infrastructure capacity, existing and planned connectivity and accessibility of the area. (Statement: "The suggested height is considered appropriate when taking account of the existing character and sub-urban nature of the area"). o The policy conflicts with Draft London Plan Policy D6, which 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. o BP7 South West, Homes, Part (e) includes reference to the suitability of areas well-served by public transport to support higher density development and an increase in housing provision to make the most efficient use of land resources. This would align with Draft London Plan Policy H1 and NPPF Chapter 11 making effective use of land. • Suggestion: It is suggested that the threshold be removed and the wording made more flexible to ensure appropriate height and density, determined on a case-by-case basis.	Policy BP7 (b) : Tall building study identifies around 5-6 storeys appropriate for Sudbury and Ealing Road Town centres. This takes into account the low-rise character of the area. Tall buildings will be focussed in Growth Areas as defined in Policy BD2. BD2 policy does however identify strategic locations in town centres being appropriate for taller buildings. Part (e) of the Policy specifically refers to co-location in on industrial and employment land in Alperton Growth Area, prioritising areas within the Growth Area that are well-served by public transport. London Plan Policy D6 Optimising Density has been moved and combined with D1A and D1B. Policy D1B encourages development that responds to a site's context, and for developments to enhance local context that positively respond to local distinctiveness with due regard to existing and emerging street proportions. The Council has identified many areas as appropriate for tall buildings. It is not considered that it has been overly restrictive and policy justifications in for example BD2 recognise exceptions may be made that allow for tall buildings not within identified tall buildings zones.	No Change.
5.7 South West	BSWGA1	Woolbro Homes	Support the policy.	Support welcomed.	No Change.
5.7 South West	BSWGA1	St. George	Proposed modification: Alperton Growth Area's transformation as an extensive area of mixed use residential led regeneration principally focussed along the Grand Union canal will continue between Alperton and Stonebridge Park stations including the former Northfields Industrial Estate. The area will be a location for taller buildings at its Ealing Road and Northfields ends, with principally mid-rise in between. Reasoning: Policy BP7 seeks to focus "tall buildings" (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton. Site Allocation BSWSA7- Northfields ("Grand Union") comprises a fundamental part of the Growth Area. Grand Union is subject to planning permission ref. 18/0321, as amended by application 19/2732, which permits a range of tall buildings up to 25 storeys. To be effective, Policy BSWGA1 should be revised to specifically refer to Northfields and make reference to tall, not taller buildings. Evidence Base: The Brent Tall Building Strategy 2019 acknowledges that "The majority of Brent is low rise, with taller buildings in key locations including Wembley, Alperton and South Kilburn." Alperton is part of the top five "largest cluster of existing and permitted tall buildings over 30m." Policy BP7 focus tall buildings in this Growth Area.	It is not considered necessary to emphasise the inclusion of any particular site allocation between Alperton and Stonebridge Park stations - there are a number of site allocations within this area and all contribute towards the transformation of the growth area. Accept that the reference to "tall" is appropriate.	BSWGA1 amend: "...The area will be a location for taller buildings at its Ealing Road and Northfields ends, with principally mid-rise in between....."

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5.7 South West	BSWSA1	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Planning considerations takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	<p>Planning considerations amend: “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.”</p> <p>Infrastructure requirements amend: <u>“ 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.”</u></p>
5.7 South West	BSWSA2	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Planning considerations takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	<p>Planning considerations amend: “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.”</p> <p>Infrastructure requirements amend: <u>“ 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</u></p>

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					<p><u>development creating identified additional capacity requirements."</u></p>
5.7 South West	BSWSA3	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Planning considerations takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	<p>Planning considerations amend: "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."</p> <p>Infrastructure requirements amend: <u>" 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."</u></p>

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5.7 South West	BSWSA4	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Planning considerations takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	<p>Planning considerations amend: “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.”Infrastructure requirements amend: <u>“ 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.”</u></p>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA5	Thames water	<ul style="list-style-type: none"> • A Thames Water Sewage Pumping Station is located within the proposed development boundary and this is contrary to best practice set out in Sewers for Adoption (7th edition). Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise. • Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy. 	<p>Noted amend planning considerations to take into account the need to address the existing pumping station. The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.</p>	<p>Planning considerations amend: <u>"A Thames Water Sewage Pumping Station is located within the proposed development boundary and this is contrary to best practice set out in Sewers for Adoption (7th edition). The development should make suitable arrangements to address this matter satisfactorily and dependent on solutions devised, future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise."</u></p> <p>Planning considerations amend: <u>"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."</u></p> <p>Infrastructure requirements amend: <u>" 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."</u></p>

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5.7 South West	BSWSA6	Thames water	No waste water network/infrastructure concerns regarding this development. However It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: “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.” Infrastructure requirements amend: <u>“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.”</u>
5.7 South West	BSWSA6	Woolbro Homes	Support for the site allocation is noted. 1. Density: The site capacity stated in Policy BSWSA6 is indicative only. It does however take into account the characteristics of the site. This site is one of the thinnest in terms of distance between the canal and Beresford Avenue. Taking into account the requirements for an appropriate setback from the canal and proximity to the suburban character of the two-storey residential dwellings likely to remain on Beresford Avenue, the site unlike others in the Alperton Growth Area, although considered suitable for tall buildings compared to the opposite side of the road is only appropriate for mid-rise height only. The requirement for there to be no net loss and re-provision of employment floorspace will also impact. A well-designed scheme may be able to provide a higher density than indicated but must adhere to the design principles and planning considerations outlined in the policy. 2. Height: See above response in relation to density.	Woolbro supports the principle of BSWSA6 (representing part of the site - 100 Beresford Avenue: 0.34ha). It has reservations regarding some of the details related to: <ul style="list-style-type: none"> • Density: Current indicative capacity of 135 units for 0.96 ha. The allocation could deliver higher density than stated of 150-200 noting the approach on approved nearby developments. Such as Afrex House (150 dwellings/ha), Abbey Wharf (178 dwellings/ha), Northfields (317 dwellings/ha), Alperton House (515 dwellings/ha). Officer reports consider this and the proposed density to be acceptable. The cabinet report for the Local Plan accepts that ‘... in terms of built form, the document in terms of scale and density has modest ambitions’. NNPF and London Plan Policy D1B supports to optimise site capacity. The Panel (Oct 19) supported assessment of individual sites. • Height: Woolbro objects to the restriction of buildings to ‘potentially around 6 storeys’ and assessment of height and density should be design-led and made on a site by site basis. SSA7 does not specify height for the allocation. The Alperton masterplan and Brent Design guide seeks developments to relate to existing neighbourhoods drawing on existing context. 	No Change.

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5.7 South West	BSWSA6	Woolbro Homes	<p>Employment floor space: the land in the allocation is a non-designated employment site and is not designated as a SIL or LSIS. Further, Alperton is allocated as a Housing Zone. Woolbro Homes consider that instead of requiring 'no net loss' of employment land in the allocation, reference should instead be made to re-provision of employment use at ground floor level, the quantum of that to be provided should follow assessment of the proposed development scheme as a whole. This amendment would respect Brent's status as a 'provide capacity' borough as well as assist in achieving the Borough's stated intention to create a mostly residential neighbourhood in this canal side location on land which has been consistently identified by both the GLA and LB Brent to be a sustainable location for the provision of new homes. • Suggested amendments –o Planning considerations: "...Given that the site is existing employment land and Brent's status as a provide capacity borough, no net loss and re-provision of employment floor space along the ground floors of the new buildings will be <u>sought required</u>. The quantum to be provided should be based on site-specific assessment of proposed development schemes as a whole..." o Design Principles: "Development coming forward should be denser than the surrounding suburban character and is suitable tall buildings of a mid-rise height (potentially around 6 storeys), subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing being delivered with the surrounding two storey residential properties that are likely to remain on Beresford Avenue."</p>	<p>3. The Alperton Masterplan (2011), although mentioning the existing industrial area being transformed into a new, mostly residential neighbourhood, has since been revoked by the council. It was adopted prior to the new London Plan, which names Brent as a 'provide capacity' borough. Given this, the Council maintains that as a starting point there should be no net loss of ground floor industrial floorspace consistent with the London Plan and that meeting this is not incompatible with other housing priorities (specifically, housing provision due to being a Housing Zone), particularly considering that the design principles of the site state that development coming forward should be denser than the surrounding suburban character and that the site is suitable for tall buildings of a mid-rise height. The re-provision of industrial space at ground floor level will also help ensure that the design principle of active frontages being provided along Beresford Avenue and the canalside can be met. As a local employment site, the maximum viable industrial floorspace should be provided. If the applicant cannot meet the site allocation requirement, then they should show that the maximum has been achieved.</p>	<p>BSWSA6 allocated use to reflect London Plan policy amend: "Mixed-use residential-led development incorporating <u>employment industrial</u> uses."BSWSA6 planning considerations amend: "Given that the site is existing <u>employment industrial land</u> and Brent's status as a provide capacity borough, no net loss and re-provision of <u>employment industrial floorspace</u>...."</p>

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5.7 South West	BSWSA7	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy. A critical trunk sewer runs through this site which would need to be considered	The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: “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.” Infrastructure requirements amend: <u>“ 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.”</u>
5.7 South West	BSWSA7	St. George	Proposed modification: EXISTING USE: Industrial Mixed Use	Existing use: Agreed amend updated status	BSWSA7 existing use amend: <u>“Mixed-use (Industrial with residential under construction)”</u>
5.7 South West	BSWSA7	St. George	Evidence Base: It is important that the approach of the Regulation 19 Local Plan allows enough flexibility to respond to the objectively assessed needs of Brent, and its population. The policies which affect the Grand Union site should be flexible enough to allow for changes over the plan period, which responding to the scale of development already granted planning permission and acknowledged within the Tall Building Strategy.	The Council agrees that the Local Plan must allow enough flexibility to respond to the needs of Brent and its population, and that policies should be flexible to allow for changes over the plan period. It is agreed that the height parameter plans associated with the outline planning permissions currently give an indication of the maximum range of acceptable heights.	No Change.
5.7 South West	BSWSA7	St. George	INDICATIVE CAPACITY: A minimum of 2900 3,030 new homes	Indicative Capacity: Indicate current consent of 3030.	BSWSA7 indicative capacity amend: <u>“2900 3,030 new homes”</u>
5.7 South West	BSWSA7	St. George	DESCRIPTION OF EXISTING SITE: The majority of the site (with the exception of a small area at the north-west) was part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan. The north-west part was formerly that is not SIL land is a non-designated Local Employment Site.	"Description of Existing Site" agree to amendment.	BSWSA7 description of existing site amend: <u>“The majority of the site (with the exception of a small area at the north-west) was part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan. The north-west part was formerly that is not SIL land is a non-designated Local Employment Site.”</u>

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5.7 South West	BSWSA7	St. George	<p>PLANNING HISTORY: Approved application 18/0321 as amended by application 19/2732 varied the hybrid planning application permission for the comprehensive mixed-use redevelopment of the former Northfields Industrial Estate.</p> <p>The scheme proposes demolition of all existing buildings on site and the delivery of a development including 2,900 homes, around 2,300sqm commercial floorspace, a minimum of 17,581sqm and around 19,000sqm employment floorspace and 1,610sqm community and assembly and leisure floorspace (use classes B1a, B1c and B8), around 2,900sqm community and assembly and leisure floorspace (uses classes D1 and D2), an energy centre, public and private open space, new routes and public access along the River Brent and Grand Union Canal, parking and cycle provision and new site access and ancillary infrastructure.</p>	The proposal to update the Planning History section by way of adding the most recent permission and removing the old description of development is noted, however, it is considered that retaining the description of development of the currently approved scheme helps set the context of the planning history of the site. However, the description is proposed to be updated in line with the most recent permission.	BSWSA7 planning history amend: " <u>Approved hybrid planning permission application 18/0321 is a hybrid application as amended by permission 19/2732</u> for the comprehensive mixed-use redevelopment of the <u>former Northfields Industrial Estate</u> . The scheme proposes demolition of all existing buildings on site and the delivery of a development including <u>2,900 3030</u> homes....."
5.7 South West	BSWSA7	St. George	<p>DESIGN PRINCIPLES: The scale and massing should be sympathetic to existing heights in the surrounding context with lower building heights closer to Beresford Avenue, whilst having regard to the height of buildings established by planning permission 18/0321 (as amended by application 19/2732) for the former Northfields Industrial Estate. Given the scale of the site, it will can create a new building height character. Tall buildings will be appropriate on this site, taking its cue from the scale of buildings approved under planning permission 18/0321 as amended by application 19/2732.</p>	Agree that the design principles should be updated as suggested to take account of the existing consents.	BSWSA7 design principles amend: "The scale and massing should be sympathetic to existing heights in the surrounding context with lower building heights closer to Beresford Avenue. <u>Tall buildings are appropriate on this site consistent with the heights parameters established by planning permission 18/0321 (as amended by application 19/2732).</u> "
5.7 South West	BSWSA7	St. George	<p>JUSTIFICATION: It will provide a minimum of 3,030 new homes 2,900 homes, employment floorspace, community, retail and leisure facilities and includes both a health centre and an energy centre.</p> <p>Reasoning: The site allocation should be updated to reflect the existing use of the site, and the development principles approved and being delivered at Grand Union by planning permission ref. 18/0321 (as amended) supported by existing adopted development plan policy and the Council's own evidence base.</p>	Agree that justification should refer to the currently approved number of homes, but not refer to this as a minimum for flexibility purposes.	BSWSA7 justification amend: "... 2900 <u>3030</u> homes...."
5.7 South West	BSWSA8	John Cox	<p>Wembley Triangle is where visitors to the Stadium/ Arena from Wembley Central station are most likely to cross. The Plan should support a requirement of facilitating the splitting-up of footfall onto both sides of the street to benefit all business equally.</p> <p>Site allocation BSWSA8 needs to specify that a consistently wide pavement is needed along this section of the High Road/ Wembley Hill Road through receding the building line at the eastern end of the site.</p>	Noted. There are likely to be significant changes to the highway network as part of Wembley Park's western corridor study at Wembley Triangle which would rationalise the highway, provide wider pavements and improve crossing.	No Change.

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5.7 South West	BSWSA8	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: “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.” Infrastructure requirements amend: <u>“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.”</u>
5.7 South West	BSWSA8	Quintain	We object to the removal of references to the Wembley Triangle highway improvements from the infrastructure section. The removal of the works from BSWSA8 will significantly weaken the Council’s ability to deliver these improvements and the requirement to safeguard land to deliver the works should be included where required.	Highways does not find it necessary to continue with land take at Wembley Triangle to deliver the junction improvement works.	No Change.

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5.7 South West	BSWSA9	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: “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.” Infrastructure requirements amend: <u>“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.”</u>
5.7 South West	BSWSA10	London Hotel Group	Policy supported. <ul style="list-style-type: none"> Capacity: It is considered that the 400 homes capacity for residential dwellings can be exceeded and that circa 1,300 dwellings can be delivered in line with the Council’s aspirations for meeting housing demand in Wembley Growth Area. 	Support for the aspirations of the allocation is noted. <u>Site Capacity</u> The site capacity stated in the Local Plan is indicative only, based on the circumstances of the site and Brent's Tall Building Strategy. The density matrix in the current London Plan has been removed from the new London Plan and does not take into account site circumstances, or the need to re-provide employment space. A well-designed scheme may be able to provide a higher density than indicated but must adhere to the design principles outlined in the site allocation and other relevant policies in the Local Plan. <u>Trees</u> With regards to trees, it is considered that the policy retains enough flexibility in outlining that trees on the site should be retained where possible, as the council's preference is for the trees on site to be retained. Any future applications resulting against the loss of trees would be assessed against policy BGI2.	No Change.
5.7 South West	BSWSA10	London Hotel Group	<ul style="list-style-type: none"> Building height: In line draft New London Plan policy for designed high-density development, we suggest greater than 5-6 storeys due to its location partially in Wembley Town Centre and with high public transport accessibility (PTAL of 4-6a, due to increase to 5-6a in 2031). The development potential of this area should not be restricted by a maximum height at this stage but considered at planning application stage, taking into account planning benefits and design quality. 	Scale / Building Heights Similarly for scale and building heights, the allocation of the site for mid-rise buildings up to 5-6 storeys is based on the circumstances of the site and the council's Tall Building Strategy. This site has a multiplicity of ownerships and will be very complicated to deliver. The Local Plan in BD2 policy justification does identify that sites which the Council has not yet identified for tall buildings may come forward where the site is of sufficient size to create its own character. The Council will need	No change.

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				to be confident that delivery of the scale identified by the respondent is possible to allow tall buildings clusters and stepping down, etc. to occur.	
5.7 South West	BSWSA10	London Hotel Group	<ul style="list-style-type: none"> Housing Strategy: LHG note the aspiration of Brent Council to provide minimum 35% affordable housing, and it is suggested that the amount of affordable housing should be the 'maximum reasonable' in the context of viability and other considerations. Site specific discussions with the Council to enable the delivery of the most appropriate mix for Elm Road. 	Housing Strategy The borough's approach is consistent with that in the London Plan. If the applicant does not follow the fast track route, then viability will be considered through the process identified in the London Plan/Housing SPG and the site will be subject to on-going reviews throughout its development.	No change.
5.7 South West	BSWSA10	London Hotel Group	<ul style="list-style-type: none"> Employment and Centres: LHG supports growth in Wembley Town Centre and opportunities for employment. However, a requirement for onsite affordable workspace should not compromise flexibility of an end user and ability for development to feasibly come forward. Guidance on how financial contribution in lieu of onsite provision is to be calculated should be provided. 	Employment and centres: Where the affordable workspace requirement is making a site unviable it is likely that the site will be subject to viability testing as ultimately it is assumed that a lower proportion of affordable housing will be offered. At this stage the Council will consider the implications of all its policy requirements and prioritise those which it feels are worth pursuing, considering the impacts of the scheme in the round. The Council will produce guidance on how financial contributions will be calculated in a future Planning Obligations SPD.	No change.
5.7 South West	BSWSA10	London Hotel Group	<ul style="list-style-type: none"> Parking: LHG acknowledges the policy direction towards encouraging sustainable modes of transport. It is considered that in accessible locations, car free development is a good starting point for development. 	Noted.	No change.
5.7 South West	BSWSA10	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	Noted. Add reference to waste water matters under infrastructure requirements.	Infrastructure requirements amend: " <u>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.</u> "
5.7 South West	BSWSA12	Sudbury Town Residents Association	STRA Neighbourhood Forum objects to the site allocation. The planning application for demolition of Keeler's Garage and development of a 5-7 residential block has been called-in by STRA Neighbourhood Forum currently awaiting the Secretary of State's decision. The allocation is contrary to the retention of Industrial space and the proposed Policy BP7 SOUTH WEST e)ensures no net loss of industrial floorspace .	Vale Farm: It is not clear what the concerns of STRA are. The Local Plan does not need to repeat the neighbourhood plan's contents verbatim. The draft Local Plan recognises the opportunities for improvement and enhancement of Vale Farm Sports Centre (Policy BP7 (n)). The Council also supports STRA's ambition for improvements and recognises in the Local Plan that it will explore all options of how this can be achieved within the financial parameters available to it (5.7.25). The open space at Vale Farm is identified as a Local Green Space. This designation is equivalent to Green Belt in national policy in terms of its level of protection (5.7.26). There is nothing in the Brent Local Plan that is inconsistent with the neighbourhood plan or which seeks to usurp its contents.	No Change.

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5.7 South West	BSWSA12	Sudbury Town Residents Association	Removal of the allocation of the Keelers' site.	The council is required to deliver 2325 homes per annum according to the new draft London Plan and this site allocation contributes towards the borough's housing need. Suitable levels of replacement car parking for disabled station users will be retained. Supporting the need to address climate change and air quality in Brent, the Council wants to discourage the use of cars and optimise the capacity the site offers.	No Change.
5.7 South West	BSWSA14	Sudbury Town Residents Association	Those that live and work within the Sudbury Town Neighbourhood Forum Area have overwhelmingly objected to the loss of this car park and residential development. This is also contrary to the Equalities Act and gives inadequate provision to Disabled persons. Development should protect and enhance the setting of the Grade II* listed Sudbury Station. Suitable levels of replacement car parking for disabled station users must be retained.	Suitable levels of replacement car parking for disabled station users will be retained. In seeking to address climate change, improve air quality and provide for meeting housing need as well as other environmental benefits such as introduction of additional greening, the Council wants to discourage the use of cars and optimise the capacity the site offers. This will be done in a manner that is not inconsistent with the need to protect or enhance the setting of the heritage asset.	No Change.
5.7 South West	BSWSA14	Sudbury Town Residents Association	Removal of the allocation of the Sudbury town station car park site.	The council is required to deliver 2325 homes per annum according to the new draft London Plan and this site allocation contributes towards the borough's housing need. Suitable levels of replacement car parking for disabled station users will be retained. Supporting the need to address climate change and air quality in Brent, the Council wants to discourage the use of cars and optimise the capacity the site offers.	No Change.
5.7 South West	BSWSA14	TfL Commercial Development	TfL CD continues to support the allocation of sites within Alperton under site allocation BSWSA1, and the inclusion of site allocation BSWSA13: Sudbury Town Station Car Park for residential use. Whilst the consultation statement notes that the currently drafted capacity of 30 residential units is indicative and therefore flexible, there is lack of background evidence base, which justifies this number and does not accurately reflect the site's capacity and efficient use of the site. • Reasoning: Given its high PTAL rating of 4-5 and the draft London Plan Policy for maximising development on underused brownfield sites in areas of high accessibility or close proximity to transport hubs. • Suggestion: Initial design work indicates capacity of approximately 55 units and this should be reflected in the site allocation.	Support for the site allocation is noted. The site capacity provided in the local plan is indicative only, taking into account the circumstances of the site (including the need to protect and enhance the setting of the Grade II* listed Sudbury Station, and retaining suitable levels of replacement car parking for disabled station users). It is noted that the estimate provided by TfL is above that in amendments made to planning application 19/1241, which in itself is a single tenure, wholly 1 bed development, inconsistent with the Council's policy approach of promoting a range of dwellings sizes in major developments. It is agreed that a well-designed scheme may be able to provide a higher density than indicated but must adhere to the design principles and planning considerations outlined in the policy.	No Change.
5.7 South West	BSWSA16	EHG Alperton	416 Ealing road: Client is in discussion with Council (19/0262/PRE) developing a mixed use scheme with 160 residential units with 400sqm commercial space. Received support from Council and GLA. It is requested the allocation is amended to give an indicative capacity of 150 homes to maximise the use.	Broad support of the land owner is noted. It is noted that the site has been subject to pre-application discussions for a scheme with a much greater housing total. Whilst the site capacity stated in the Local Plan is indicative only, based on the circumstances of the site and Brent's Tall Building Strategy it is agreed a well-designed scheme may be able to provide a higher density than indicated. As such the indicative capacity will be raised to 120 dwellings to take account of the potential need to reduce mass proposed in the pre-app.	SBSWSA16 indicative capacity amend: " 80 120"

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5.7 South West	BSWSA16	EHG Alperton	<p>• 45-47 Alperton Lane: Why is the site now part of the Alperton South LSIS. The 2015 Brent Employment Study identified this site (C16 Alperton Lane) in poor condition and that parking is inadequate for B2/B8 uses. o Principally disagree with following comment by the Brent Industrial Land Audit October 2019: ‘To the north the site is bounded by open space, a large format retail unit and two industrial units comprising factories, warehouses and premises. In terms of function, these industrial premises form a natural extension to the LSIS. This comprises a site of 4,900sq.m. To protect the industrial function of these premises the LSIS boundary is to be extended to encompass them.’o The site does not form a natural extension to the LSIS, Alperton Lane is in fact considered to form the natural boundary to the LSIS particularly given emerging plans for the Curry’s site. In site’s pre-application discussion (ref. 16/0537/PRE), the Council were supportive of a residential led development. Surrounding context of the site is different to that of the existing LSIS south of Alperton Lane. There is two storey terraced housing to the north of the site on Burns Road and an emerging high-density residential development at Curry’s 416 Ealing Road to the east. The immediate context is therefore predominantly residential in nature and so not considered to be suitable for intensified B class uses. o In the absence of clear or robust justification for including 45-47 Alperton Lane it is requested in the first instance this parcel of land be removed from the Alperton South LSIS. Should the Council reject the above position, in the second instance it is requested this parcel be separated into a separate LSIS from Alperton South where co-location of uses would be acceptable. It appears illogical as to why this parcel of land is protected for solely employment uses as opposed to suitable for co-location of uses; this site in our view could be a bridge between the residential and the industrial uses where a co-location of uses would be most appropriate.</p>	<p>In relation to the adjacent industrial site, the new London Plan identified Brent as a borough which is to provide industrial floorspace capacity. Following this, Brent undertook an Industrial Land Audit which provides recommendations to increase industrial floorspace through intensification, co-location and other mechanisms, and allowed the potential to extend current SIL / LSIS boundaries to support the aim of providing industrial floorspace capacity. Any pre-app discussions from 2016 involving the adjacent site would have been undertaken within a previous policy context, prior to Brent understanding the implications of its provide capacity borough status. As such if the council were supportive of a residential led development in the past, this would be outweighed by the current policy context. The council maintains that this adjacent industrial site (comprising factories, warehouses and premises) is a natural extension to the LSIS in terms of function and therefore should be included within the LSIS in order to protect their industrial function and support the identification of Brent as a provide capacity borough. Brent’s Industrial Land Audit identified that this LSIS was not appropriate for co-location. Because this parcel of land has been included in the Alperton South LSIS (due to being a natural extension to it) it is not considered to be appropriate for co-location. Additionally, the West London Employment Land Review has identified that LSIS sites such as this are likely to be viable to come forward solely with industrial uses and would not require any residential development to help subsidise this.</p>	No change.
5.7 South West	Blank South West	EHG Alperton	<p>Locally Significant Industrial Site (LSIS), ‘Alperton South’, boundary has been revised to include 45-47 Alperton Lane.</p>	<p>The site is considered appropriate to designate as LSIS given the borough’s provide capacity designation, its designation as such gives it a greater degree of protection for industrial uses and potential to intensify.</p>	No Change.
5.7 South West	Blank South West	John Cox	<p>The Plan is not positively prepared with regards to area immediately surrounding Wembley Central station. Spatial planning in this area in relation to maximising social benefit, in a location where attracting investment is possible, has not been addressed. Historically, the old West Coast Main Lines placement resulted in the poor capitalisation of land surrounding stations. The Metropolitan/ Jubilee lines came later, directing routes through existing settlements to support growth in those areas. The Great Central railway was built to provide links to Sheffield and Manchester, not to serve London’s suburbs. Therefore, the WCML stations have little sense of place, including: Queens park, Kensal Green, Willesden Junction, Harlesden, Stonebridge Park, Wembley Central, North Wembley, South Kenton, and Kenton. The line needs a Town Centre along it to provide a commercial, but</p>	<p>Wembley Central station is located within Wembley town centre, which is recognised as a Major Town Centre in Brent’s town centre hierarchy (as shown in par. 6.4.27). It is also allocated as a growth area, to encourage regeneration and high quality mixed use environments. The council does not agree that the Local Plan policies in relation to land around Wembley Central do not maximise social benefit or enable Wembley Central to perform a social function. The Elm Road site allocation, the site allocation closest to Wembley Central station and which sites partly within Wembley town centre boundary, requires future development to include accessible community facilities. Other policies in the local plan, such as BH5, will also ensure social benefit through the delivery of affordable housing. In addition to this, Wembley is also recognised as one of Brent’s nine priority town centres, and</p>	No Change.

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			<p>particularly a social function, such as is afforded by the Jubilee Line. The Centre should be Wembley Central. It should be attractive, with wide pavements, trees attracting significant dwell times. Currently seems like a place where people just pass through. Town centres are places for all people to congregate, not just shop. Wembley High Road is at capacity, with Bridgewater Road being built in 1929 for a bypass for it to the North Circular. Wembley Growth Area policy is unsound as not positively prepared enough. Promotion of development within Wembley High Road East as an important place should be made. The road should have a sense of place, not just movement as is permeated throughout the DNL. The centre also needs to support visitors to the Stadium/ Arena, which in turn should help support local businesses. In practice this should involve closing side roads onto the High Road, and making Ealing Road a T-junction, not a crossroad. As a result side roads may need reconnecting to meet needs. Money flowing from development should be directed toward these aims. The building line should recede, providing developers more height in return. It is unacceptable that there are single storey shops meters away from the station. These should be developed. The new stairway to the rear of the station is impressive, but it's a shame the building line wasn't taken back. The set back which has taken place is interrupted by columns for the support of upper floors. This exemplifies Council hesitation due to poor vision impacting design quality/ outcomes. The shops between the existing station plaza and the new south-western side development should be allocated for development. There should also be another large site allocation on the north west corner of the high road, including the majority of the adopted service road to the rear of the shops, and possibly including the houses on the south of Turton Road (which would otherwise be overshadowed by proposed development). Unfortunately this location already includes one new small attractive development, and therefore new development would need to fit around it. I am not suggesting the substantial buildings on the High Road between Ealing road and park lane are removed. This includes Lancelot Road which should be closed and given new connection via side roads to the north. The northern side shops above the railway tracks may require inclusion as this would provide opportunity to recede the building line. The biggest problem here would be land assembly.</p>	<p>the council is producing town centre action plans that deal with objectives relating to retail, improving the economy, making centres more attractive and accessible and allowing them to better meet the needs of the surrounding community and providing for additional housing opportunities. Once development is completed as part of the nearby Wembley Park development, Wembley and Wembley Park should form one contiguous town centre and due to this the new draft London Plan identifies the single emergent town centre as a potential Metropolitan Centre. Policies BE4 and BE5 seek to ensure that Brent's town centres (including Wembley) continue to function, serving their immediate communities while attracting a wider catchment in the case of Wembley. BE7 requires that proposals to shop fronts demonstrate high quality design and that forecourt trading does not cause obstructions, contributions towards attractive town centres and encouraging human activity. Provision of trees is also supported by the local plan. Closing side roads onto Wembley High Road would not require a local plan policy and could be taken forward as part of a highways scheme. Any proposals for development (including those which would affect the size of forecourts and pavements) would be assessed against relevant design policies and take into account accessibility, again linking into wider social benefits. Building lines of potential development (and increasing the height of buildings as a trade-off for this) would be considered against relevant policies. This is occasionally a consideration as part of the planning process. With regards to potential additional sites near Wembley Central station, the council has in the past undertaken a 'call for sites' exercise and as part of its Issues and Options consultation asked whether there were any specific sites that people were aware of that could be identified as Local Plan site allocations. In the absence of representations or evidence from landowners for the sites identified in the representation to suggest that they would be supportive of sites / land being available for development, the council considers that the general policies of the Plan which identify the scope for town centre sites to intensify for a wide range of uses and to accommodate taller buildings is a sufficient positively prepared approach to encouraging future development. On Elm Park Road it has been able to go further because of developer interest. Many of Brent's town centres feature single storey shops which could be suitable for re-development. The council provides an enabling role for development to come forward and would be supportive of mixed-use development in town centres and growth areas. Should any sites come forward, they would be assessed against Brent's Tall Building Policy and Tall Building Strategy (which outlines which parts of Wembley Central are designated as tall building zones) and would also need to have regard to Brent's design policies.</p>	

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	Blank South West	John Cox	The proposed new T-junction at Wembley Triangle must be publicly consulted on. The aim should be to de-emphasise the straightness of the High Road, giving the three roads at the junction equal priority visually (even if A404 traffic is prioritised). This will provide a more attractive street scene for pedestrians, including those yet to cross the road from Wembley Central. Wembley Stadium station should be sign-posted for cars, cyclists and pedestrians. You may also remodel the junction of Wembley Park Drive and Empire Way which should involve public consultation. This will require consideration of which road to prioritise, or giving a 'three-equal-legs' junction (even if some are favoured by lights). Segregated cycle lanes and pedestrian should be a top priority.	Consultations on changes to the highway would be carried if required by relevant legislation. Changes to Wembley Triangle or remodelling to the junction of Wembley Park Drive and Empire Way do not require a local plan policy and could be taken forward as part of a highways scheme as they will not need to go outside the current highway boundary. The council agrees that the needs of cyclists and pedestrians should be considered in any junction remodelling.	No Change.
5.7 South West	Blank South West	Sudbury Town Residents Association	Sudbury Town Residents Association and Neighbourhood Forum conducted a survey and asked those who live and work within the area, whether they support the Sudbury Town Neighbourhood Plan or the Draft Local Plan. More than 319 persons living or working expressed their opinion and 100% of those surveyed support the Sudbury Town Neighbourhood Plan, 0% support the Draft Local Plan. If required, STRA can submit a copy of this Survey. STRA Planning have reviewed the Draft Local Plan document for the South West Area of Brent and have many concerns that the Draft Local Plan is not positively prepared, not justified, not effective and inconsistent with National Policies. In addition, the Draft Local Plan is not consistent with the Sudbury Town Neighbourhood Plan, which is a planning policy for 10 years.	Whilst it is not disputed that STRA got this many people to sign a petition, the wording of what people were asked to sign if consistent with STRA's representation does not reflect the content of the majority of the draft Local Plan. It is noted that in drawing people's attention to the content of the Local Plan to sign the petition, additional representation on the Plan's contents from concerned residents was limited.	No Change.
5.7 South West	Blank South West	Sudbury Town Residents Association	<ul style="list-style-type: none"> Removal of Intensification Corridors from the Plan regarding Sudbury Town. 	The council is required to deliver 2325 homes per annum according to the new London Plan. Not only does BSWA12 contribute towards meeting the borough's housing need, it would provide maximised ground floor employment uses, contributing to the local economy. An application on this site has been recommended for approval subject to legal agreement.	No Change.
5.7 South West	Blank South West	Sudbury Town Residents Association	<ul style="list-style-type: none"> There is a shortage of Secondary Schools currently and the increase in residential units will only exacerbate the problem. The Council are responsible for school placements but have no Secondary Schools. 	The Infrastructure Delivery Plan shows Secondary School projects currently being planned for or considered within Brent and will be updated on a rolling basis. There is sufficient supply planned to meet identified needs.	No Change.
5.7 South West	Para 6-4-27	Sudbury Town Residents Association	<ul style="list-style-type: none"> Correction of the definition of Sudbury Town as a Town Centre to read a Local Centre. 	All designated Local, District and Major centres in Brent are considered to be town centres. It is therefore not incorrect to refer to Sudbury Town as a town centre, as Sudbury Town has a town centre boundary as designated on the policies map. Page 321 of the local plan shows the town centre hierarchy and correctly shows Sudbury Town as a local centre within the hierarchy.	No Change.

6.1 DESIGN

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD1	Quintain	Support the need to identify locations for tall buildings and that growth areas are acceptable for these. The Tall Building Strategy has been significantly revised, and considering the following is addressed, we consider it a sound evidence base. Map identifies both a core and pinnacle zone which have been annotated using the same polygon and is therefore not clear if these represent different designations. Pinnacles have not been shown in the Tall Building Strategy. The pinnacle designation should either be removed, dealt with whilst masterplanning, or that the Tall Building Strategy is updated to include these locations.	The policies map key does include pinnacle, which has not been populated. It shall be removed from the key. The Tall Buildings Strategy previously set out a more rigid approach to development stepping down from the pinnacle. Whilst the pinnacle building height is still identified in the strategy in some zones, this indicates the maximum height that is considered acceptable, but does not necessarily mean that this height can only be achieved within the current pinnacle site, or immediately adjacent to it. Opportunities might well exist for a variety of locations in the zone for such height.	Remove from the Planning Policies Map Key: "Pinnacle" associated with the Tall Buildings Zones.
6.1 Design	BD1- BD2	TfL Commercial Development	Agree development should respect local character and context with regards to scale and massing etc.. NDLP policy D6 states that densities should be optimised considering character, land uses, existing and planned accessibility and connectivity, and infrastructure capacity. As such there should be greater flexibility on development heights, using a design-led approach. The Council's Consultation Statement notes that developments outside of Tall Building Zones must respond positively to existing character, including heights, but proposes no increased flexibility to help implement this. Under a site by site design-led approach the policy would ensure this is accurately reflected to allow for optimal growth. In addition, the exception circumstances within which tall buildings would be permitted outside of the zones should include: 'positive additions to the skyline that would enhance the overall character of the area'. The requirement for the building to be of civic or cultural importance is overly specific and restrictive, and will not promote tall buildings where suitable.	The Council has taken a plan led approach to identifying where Tall Buildings are likely to be appropriate in the borough. This focuses on clusters, rather than one off tall buildings. The Plan identifies a large number of areas where tall buildings are appropriate. It is not considered to be overly restrictive with regards to the opportunities available. The policy justification indicates that flexibility might exist where it can be justified, however this is seem as being the exception rather than the norm.	No Change.
6.1 Design	BD2	Barratt London and TFL	The southern part of BCSA7 Wembley Park Station is contained within the Wembley Park Tall Building Zone, but not in the Core. This highly accessible location is suitable for high-density development and is a strategic source of housing under Policy H1. The allocation's eastern extent next to the station entrance is entirely appropriate for a tall building as it is also adjacent to the Core. This would maximise housing delivery. A landmark building would also aid the area's legibility, signposting Wembley Park Station. Adjacent tall buildings are along Brook Avenue. The area's character therefore allows for equivalent or taller height buildings. The boundary of the Tall Building's Zone 'core' should be extended including all of the south part of BCSA7: Wembley Park Station (North & South) allocation.	It is agreed that the southern part of BCSA7 is appropriate for tall buildings. As identified in the Tall Buildings Strategy, it is not considered that this site is appropriate for very tall buildings that might be acceptable if it were within the core. Notwithstanding its accessibility to public transport, the station is on the edge of the Tall Buildings Zone and as such it is considered that the scale of development, consistent with the rest of the strategy should reduce towards its edges for development to have a more sympathetic relationship with the adjacent lower rise character. To emphasise the importance of the station as a landmark destination a high quality design that creates a striking building could be used, rather than relying on increased height as the marker.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD2	Environment Agency	In our previous Regulation 18 Policy BD2 response we recommend an additional height restriction directly adjacent to watercourses due to detrimental impacts on ecological value through increased shading. Such development depending on height may require greater than the standard 8 metre buffer adjacent to a watercourse. If this is not possible, shading or encroachment impacts must be mitigated for, either on the site or elsewhere. No substantial amendment to this policy has occurred. A proposed amendment in the Brent Local Plan Preferred Options Consultation Responses, October 2019, states, "The design criteria in the Tall Buildings Strategy are now expanded and are also included in the Local Plan policy justification including the following sentence in the Wembley Park search area text in the Tall Building Strategy: ""Waterside development should be sufficiently set back and avoid overshadowing of the watercourse". This proposed change is not evident in the Local Plan Regulation 19 Consultation document or Brent Tall Building Strategy October 2019, and therefore expect further clarity on where these amendments are contained.	The reference in the Brent Local Plan Preferred Options Consultation Responses, October 2019, to the amendment of the Tall Building Strategy: "Waterside development should be sufficiently set back and avoid overshadowing of the watercourse" was unfortunately an error and not reflected in the Strategy which underwent extensive change post Preferred Options stage as a result of feedback received. For developments adjacent to waterways policy BG11 identifies that "development is required to improve access to the waterway, enhance its setting and provide an appropriate landscaped set-back which may include public open space". This together with the requirement in BD2 for tall buildings to "positively address their ...environmental impacts" gives sufficient scope to ensure that the quality of Blue Infrastructure is not unacceptably undermined and ideally improved. Those areas identified as appropriate for tall buildings south of a watercourse and therefore likely to have the most potential for over-shadowing are along the Wembley Brook between Wembley Park Drive and Fourth Way. In terms of the watercourse itself, along the whole of its length it is a concrete channel with vertical sides and no vegetation within it. It therefore has very limited bio-diversity. The potential for this realistically to be changed is very limited due to the structural integrity of the channel needing to be maintained on both sides and the limited potential to pull back development significantly along its whole length from the channel due to the size of plots. As such it is likely that in most cases the best solution that can be attained is improving the setting of the channel, providing gaps so that it can be more easily seen/appreciated and improving bio-diversity at ground level adjacent to it.	No Change.
6.1 Design	BD2	St. George	Object as: no sufficiently flexible, not effective. Proposed modification: In Tall Buildings Zones heights should be consistent with the general building heights shown on the policies map, stepping down towards the Zone's edge. Elsewhere tall buildings not identified in site allocations will only be permitted where they are: Reasoning: The proposals map does not show general building heights. Evidence base: The proposals map.	The policies map will be interactive and give an indication of the heights when the layer is clicked on sites that fall within its boundaries. The reference to site allocations is required as some allocations identify heights that are tall enough to be regarded as Tall Buildings, but not of a height to warrant identification of a Tall Buildings Zone (includes buildings 10 storeys or above).	No Change.
6.1 Design	BD2	Wembley Towers Limited	Generally support as BSSA6 and BSSA7 fall within a Tall Building Zone. Policy states that heights should be consistent with general heights, stepping down towards the zone's edge. Although these sites have exceptional constraints, including flood risk (being resolves), there is significant opportunity for enhanced place-making and density/ height uplifts. Therefore there is scope to secure maximum heights on this sites. Therefore the policy should be made more flexible so as to allow for this.	This is not considered appropriate. The allocated sites are not within an intensification corridor (in recognition that they are allocated and that taller heights than 5 storeys might be appropriate). Whilst some potential flexibility is considered appropriate in town centres where there might be more of a variety of building heights, and character, the intensification corridors tend to have a more uniform low rise character within them and adjacent. The policy justification indicates that flexibility might exist where it can be justified, however this is seem as being the exception rather than the norm.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD2	GLA	2. (BHC2) Support protected views and illustration on policies map. Recognition of DNLP HC4 noted also. The background view is key, and in order to follow HC4 correctly, this part needs to be illustrated clearly. Brent should consider providing evidence as to why these views are important and what makes them locally significant. This will help form the basis for decision making.	2. The background view is included on the policies map. It is appreciated that the current A0 map that shows all policies is busy and it can be difficult to make out a particular viewing corridor clearly. There was another map provided to assist with less designations on it that allowed better understanding of the extent of the views in the foreground which also extended beyond the stadium for a few hundred metres in some cases. Once the Plan has been adopted, the map will be made interactive, and it will be possible to filter out layers which impact on the map's clarity.	No Change.
6.1 Design	BD2	Mary Duffy	Brent gives too much weight to desires of developers, including Quintain and Aitch. They should not be allowed to build as tall as they like. Brent has remained predominantly low-rise for generations, and the London Plan seems intent increasing development height around the North Circular. Developments show short-sightedness and cater only to developer profits. The Tipi homes do not appear popular and Brent may have to buy these back to reassign to social housing at a later date.	The need to accommodate additional homes, employment and associated social infrastructure to meet growing population needs will require a more intensive use of land. The Council has sought to positively plan for parts of the borough to accommodate taller buildings in its Tall Buildings' Strategy. This will ensure that the majority of Brent remains low rise in character.	No Change.
6.1 Design	BD2	DTZ Investors	Object as the policy is unsound, being insufficiently flexible. It should be amended, removing: 'In Tall Buildings Zones heights should be consistent with the general building heights shown on the policies map, stepping down towards the Zone's edge.' The policies map should be amended as shown for the "core" (blue) tall building area to cover a larger extent, reflecting the existing tall building character within the immediate locality and A5 frontage. The map does not contain general building heights mentioned in the policy. In any event it would be inappropriate to do so. The Local Plan would date very quickly with their inclusion.	The policies map will be interactive and give an indication of the heights when the layer is clicked on sites that fall within its boundaries. It is considered an appropriate response for the Zone to reduce in scale towards its edges, particularly where a lower rise context will prevail. In relation to the Core for Zone C for the Colindale Tall Building Zone as identified in the Tall Buildings Strategy, it is recognised that the Zone as shown is slightly inconsistent with the wording and should extend further east to follow the main building line along the A5.	Amend the map in the Tall Buildings Strategy and Policies Map to show the Tall Buildings Zone Core in Zone C of the Colindale Tall Buildings Zone extending to the edge of the main building line along Edgware Road so that it is consistent with the text in paragraph 8.51 of the Tall Buildings Strategy.
6.1 Design	BD2	Environment Agency	Pleas policy requires tall buildings to positively address environmental impacts. However not able to see amendments addressing our previous points specific to tall buildings next to watercourses.	The reference in the Brent Local Plan Preferred Options Consultation Responses, October 2019, to the amendment of the Tall Building Strategy: ""Waterside development should be sufficiently set back and avoid overshadowing of the watercourse" was unfortunately an error and not reflected in the Strategy which underwent extensive change post Preferred Options stage as a result of feedback received. For developments adjacent to waterways policy BGI1 identifies that "development is required to improve access to the waterway, enhance its setting and provide an appropriate landscaped set-back which may include public open space". This together with the requirement in DB2 for tall buildings to "positively address their ...environmental impacts" gives sufficient scope to ensure that the quality of Blue Infrastructure is not unacceptably undermined and ideally improved.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD2	Stonebridge Real Estate Development	Generally support as BSSA6 and BSSA7 fall within a Tall Building Zone. Policy states that heights should be consistent with general heights, stepping down towards the zone's edge. Although these sites have exceptional constraints, including flood risk (being resolves), there is significant opportunity for enhanced place-making and density/ height uplifts. Therefore there is scope to secure maximum heights on this sites. Therefore the policy should be made more flexible so as to allow for this. Proposed Modifications: Update BD2 as underlined to ensure it is sound and consistent with other policies and allocations in the plan: 'In intensification corridors and town centres outside conservation areas developments of a general building height of 15 metres above ground level could be acceptable, with opportunities to go higher at strategic points in town centres and intensification corridors.'	This is not considered appropriate. The allocated sites are not within an intensification corridor (in recognition that they are allocated and that taller heights than 5 storeys might be appropriate). Whilst some potential flexibility is considered appropriate in town centres where there might be more of a variety of building heights, and character, the intensification corridors tend to have a more uniform low rise character within them and adjacent. The policy justification indicates that flexibility might exist where it can be justified, however this is seem as being the exception rather than the norm.	No Change.
6.1 Design	BD2	GLA	SPLIT INTO 2 1. (BD2) Welcome measures taken to define what constitutes a tall building, setting out 6m above prevailing heights, or 30m+. It is not clear when and where each of these is to be applied and therefore the policy requires amending to make this explicit. The policy also states that the policies map sets out the general building heights which it does not. Neither does it define what is meant by the zone, core and pinnacle which also requires clarification.	The policies map does not currently provide the appropriate building heights within the Tall Building Zones, these were set out in the supporting Tall Buildings Strategy. When the Local Plan is adopted it will be accompanied by an interactive policies map that will be produced (similar to the existing Brent Policies map) which will provide the building heights as identified in the Strategy. In terms of the pinnacle, it is proposed that this will be removed from the Policies Map key as it is now not going to be shown and reflected an approach in the Tall Buildings Strategy which is no longer being adhered to in such a definitive manner as was previously considered appropriate.	Planning Policies Map Key amend: remove "Pinnacle" associated with the Tall Buildings Zones. Planning Policies Map amend: Add appropriate building heights for the Tall Buildings Zones on the interactive map consistent with the Tall Buildings Strategy.
6.1 Design	BD3	J M Kirker	Plans for basement developments are inadequate as there is no requirement for assessment of the impact upon local conditions, including groundwater, flooding, subsidence etc. as has been considered by other Boroughs. Policy does not address residents concerns in this regard.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD3	Danielle Rapaport & David Hall	Process and consideration for granting of basement development not as thorough as other boroughs, causing significant concern in the neighbourhood. This is in light of the application for Exeter Road, which we previously opposed. This application did not include a technical investigation into the potential impacts for the area, particularly considering increase subsidence in the area.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.
6.1 Design	BD3	Julia Hanika	Initially welcomed the premise of a Brent Planning Basement SPD. However, it does not set rigorous enough requirements. Camden, Westminster, Kensington & Chelsea and Islington require a 'Basement Impact Assessment'. This is a standard set of safeguards for the planning team and the public at large. A glaring omission from the Brent SPD is a 'The Structural Method Statement (SMS) which requires qualification by consultants related to each field. These include a Basement Impact Assessment overview report (structural engineer), Full structural design drawings and calculations (structural engineer), Construction Method Statement (structural engineer), Ground Investigation and Assessment (hydrogeologist) and Ground Movement Assessment (structural engineer). Larger schemes may also require further reports. In the Brent SPD these are suggested, not required. As such, it relies on Building Control picking up problems and reliance on the integrity of the professional teams. Camden require applicants to pay for these reports which are subject to independent audit. Brent's plan should have parity of requirements including those in the National Planning Policy (NPPF) paragraph 153.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.
6.1 Design	BD3	Kate Duffy	Current Brent policy does not require provision of technical or engineering based data at the planning application stage. Other London boroughs now require full assessments of a consideration of a scheme's impact on drainage, flooding, groundwater conditions and structural stability etc. in the form of a basement impact assessment at the application stage. Brent's policy needs to reflect concerns about structural and other implications of basement development.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against should development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD3	Michael Rustin	Brent's policy is much less rigorous on technical issues than that of other neighbouring boroughs. Close proximity of basement development to other dwellings raises structural issues, especially potential subsidence. How do Brent's procedures take account of such risks to neighbours?	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.
6.1 Design	BD3	Thames water	The response of the Council to the representation on sewer flooding was not satisfactory in referring to mechanisms in building regulations dealing with sewer flooding. Building Regulations only require pumped devices in high-risk areas, with anti-flooding valves installed in areas at low risk. There is no absolute requirement for pumped devices. The risk of sewer flooding can change as additional flows are connected and climate change results in storms that are more intensive. Risks also increase if there are any operational issues with the network. Valves can be blocked and prevented from closing properly. When closed there is a risk in flooding from wastewater generated within a property. Consequently all basement developments should be fitted with a positive pumped device or similar. This will ensure that the property is adequately protected sewer flooding risk consistent with NPPF paragraph 149. Similar to Policy CL7 of the Royal Borough of Kensington and Chelsea Local Plan, a bullet point added to Policy BD3 should state:- Be protected from sewer flooding by a suitable pumped device.	As Thames Water identify there is no requirement through building regulations for pumped devices, yet there are potential on-going flood risks through not having pumped devices, and that such devices are necessary to ensure that the development does not cause increased unacceptable flood risk to occupants (which is not addressed in Policies BSUI3 and BSUI4). As such it is considered appropriate to add the suggested additional bullet to the policy.	Amend Policy BD3 by adding another criterion: " <u>g) Be protected from sewer flooding by a suitable pumped device.</u> "
6.1 Design	BD3	Paul Handley	Paragraph 6.1.3 recognises potential negative impacts of basement delivery but states that such concerns are controlled by regimes outside the planning system. This represents an abdication of responsibility by the planning department. The policy should be more in line with other London Boroughs, using a more stringent approach by requiring specific technical and engineering data at application stage. Approval should only be given once demonstrated the proposal will not harm neighbouring properties, or the structural, ground, or water conditions of the area. A full range of technical criteria should be required, including on: drainage, flooding, groundwater, and structural stability, establishing a comprehensive impact assessment.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.1 Design	BD3	Eric Cliff	Basement planning applications should be subject to a basement impact assessment at the application stage which would require an independent assessment of a basement scheme's impact on drainage, flooding, groundwater conditions and structural stability.	The concern about impacts on neighbours, particularly those sharing a party wall with a basement development is understood. The approaches mentioned by other councils were considered at the time the Council produced its Basement SPD. Notwithstanding other boroughs' approaches, where the scale of basement developments are in comparison to Brent very large, the Council does not consider that the structural elements in particular sought in the representation fall within the remit of planning. Inclusion of these requirements gives residents unrealistic expectations of what falls within the remit of planning (which has a statutory requirement to not duplicate matters addressed by other legislation) and the level of enforcement it has against development not be in accordance with the assessments, or despite the assessments being followed there is still structural failure affecting neighbours.	No Change.
6.1 Design	BD3	Mary Duffy	Do not support tall buildings as they reduce the quality of the environment.	Noted. The London Plan has set Brent a significant housing target. Brent has limited brownfield land available which can bring forward sustainable development. Therefore in order to meet this requirement it is essential that existing sites are optimised with higher densities. The approach taken has been to concentrate taller buildings in areas seen as appropriate for higher development so as to limit their impact across the borough. This is supported within the London Plan. Our approach is evidenced within the Tall Building Strategy. Tall buildings will be subject to stringent design policies, only being considered acceptable if they are of high quality design.	No Change.

6.2 HOUSING

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.2 Housing	Para 6-2-12- 6-2-13	Quintain	Concerns regards HMOs set out in paragraphs 6.2.12 and 6.2.13 are noted. Purpose built, well-managed and high quality build to rent developments such as Wembley Park HMOs play a vital part of the in the local housing Market. The local plan should make this distinction. This will reassure build to rent developers of the council's position on HMOs in such developments. Amendments: 6.2.12 "...Whilst they do Where such accommodation is purpose built, well managed and high quality it provides a valuable role in meeting housing need and will be supported. However where this is not the case their concentration can sometimes have adverse impacts on neighbours..." 6.2.13 "...Nevertheless, the council is likely to go through the process of removing permitted development rights for change of use to HMOs to come into effect in 2020."	Supporting the provision of a quality product is agreed to be a worthwhile outcome. Nevertheless, the Council still considers it appropriate to support balanced and mixed communities. The renting out of properties to sharers also distorts the market for non-sharers as it inflates residential rents for 2 or more bed dwellings above those which single households would be willing/ are able to spend.	6.2.12 "...Whilst they do <u>Where such accommodation is purpose built, well managed and high quality it provides a valuable role in meeting housing need and will be supported. However where this is not the case their concentration can sometimes have adverse impacts on neighbours. HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families.</u> ..."
6.2 Housing	Para 6-2-12- 6-2-13	Quintain	Reference to the proposed Article 4 Direction removing C4 permitted development rights is not considered necessary or relevant to the Local Plan and should therefore be deleted.	The progression of the Article 4 is factual and it has been 'made' on 21st October 2019. Approval will be sought to confirm an article 4 in due course.	No Change.
6.2 Housing	Para 6-2-27	John Cox	Vacant building credit. DNLP policy H9(A) is unlikely to bring forward additional development in London, and therefore is unlikely to be appropriate in this context. However, in some circumstances it may provide an incentive for development on sites containing vacant buildings which would not otherwise come forward. The panel has suggested its deletion as it would be contrary to national policy. Justification for this is the significant housing need (incl. affordable housing), and past delivery without the VBC, indicating land will come forward without this incentive. Whilst the need for affordable housing is acute and the potential impact of VBC significant, these circumstances are likely to apply to most large urban areas. There is also insufficient evidence of the impact of disapplication of VBC across London to justify the departure from NPPF. If boroughs wish to do so, they can based on local evidence as the London Plan may not. Therefore the Brent Local Plan should provide such evidence.	Noted. To date the Council has had no applications for Vacant Buildings Credit. It is considered that the likelihood of this being a significant issue that merits a policy at this stage is unlikely.	After paragraph 6.2.27 under London Plan heading amend: "Policy H9 Vacant Building Credit" .
6.2 Housing	BH1	Quintain	We await panel recommendations in relation to London Plan housing targets for Brent and how the Local Plan will reflect this.	Noted. The Brent Local Plan will be amended to now identify the London Plan target 23,250 dwellings as the minimum that will be delivered in the period 2019/20-2028/29.	None specific to this representation. Policy BH1 will however be amended to identify the London Plan target 23,250 dwellings as the minimum that will be delivered in the period 2019/20-2028/29.
6.2 Housing	BH1	Angela Barrett	Development should take place on existing substandard sites rather than parkland / greenfield. We did not choose to live in Brent to be surrounded by builds and high rises. Brent's open, suburban character is at risk and higher population will result in lower quality of life and pressure on pollution and transport.	Proposed development on greenfield land is very exceptional and is part of a wider consolidation of open space and its replacement, which will overall increase the quality/ function of that open space, e.g. in Northwick Park or South Kilburn. Tall buildings are required to meet the housing needs of the growing population of the borough, that the Council must	No Change.

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				plan for, the majority of the borough will however remain low rise and suburban in character.	
6.2 Housing	BH1	Resident	London Plan housing targets have been revised down. The new Plan should reflect this revision. Extreme housing densities impact local amenity and green spaces.	It is recognised that the strategic policy context represented through the London Plan has been going through change. The Brent Local Plan will be modified prior to adoption to reference the content of the final version of the London Plan.	None specific to this representation. Policy BH1 will however be amended to identify the London Plan target 23,250 dwellings as the minimum that will be delivered in the period 2019/20-2028/29.
6.2 Housing	BH1	Woolbro Homes	Support intention to maximise the opportunities to provide additional homes in the period 2041 and beyond. In particular, support focus on growth areas and site allocations (such as Alperton and BSWSA6). This will assist with achieving sustainable development, by focussing development in a sustainable location as well as maximising effective use of previously developed land (NPPF 2019, para. 8).	Support welcomed.	No Change.
6.2 Housing	BH1	GLA	Policy BH1 diverges from the draft new London Plan housing target of 29,150 to deliver 27,482 homes between 2019 and 2029. The Panel's Report recommended Brent's housing target is 23,250 dwellings up to 2029. While the outcome of this matter is yet to be determined, it is recognised that the suggested housing target of 2,748 homes a year up to 2029 is from its housing trajectory, which is included as an appendix.	Noted. The Council is proposing to amend Policy BH1 to take account of the Intend to Publish Version of the London Plan and seek to deliver a minimum of 23250 dwellings in the period 2019/20 - 2028/29.	Amend BH2 to "...to provide a minimum 27,482 23,250 homes in the period 2019/20-2028/29...."

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6.2 Housing	BH1	Innovative Infill	<p>Housing policy deviates from London Plan in a manner which is not justified, and which undermines the effectiveness of delivery of housing. Housing Delivery Targets on Small Sites Paragraph 6.2.17 argues the Brent policy context to date was ‘generally supportive of small site delivery,’ resulting in the delivery of 260 new homes per annum. Review of historic Brent planning applications reveals almost none were specifically consented on suburban / metroland infill sites. Indeed, very few applications were received compared to other Boroughs with a similar suburban context. This reflects the chilling effect of previously restrictive policies such as CP17. As such it is not represent reliable evidence as to the small site capacity in a future, more permissive policy context. Watering-down of London Plan policy H2A. Brent’s proposed deviation from London Plan targets for small sites deviates from regional planning policy without sufficient justification and hence represents a threat to the soundness of the plan. Site allocations process The approach to identifying and allocating housing sites ignores the conventional suburban typology. Small-sites targets would be more achievable if this had been investigated more closely, e.g. examining redevelopment of mews-lane garage sites within the inter-war suburbs. The allocations process should seek to identify at least one suitable area where such a mews lane development could be permitted, as a test-bed for future rounds of allocations, and as a means to improve the effectiveness of the plan. Self- and Custom-Build The council notes its statutory duty to support self- and custom-build, but has not followed this with an active commitment to encouraging such developments. The brownfield register by its nature does not capture many of the smaller, privately owned, domestic scale plots, generally in suburban infill settings, which are highly appropriate to small-scale self-build projects. Amending BH4 to reflect a positive and permissive approach to small sites across the residential suburbs will assist in improving the availability of plots suitable for the self- and custom-build market. Changes in residential density Parts of the borough face challenges of overcrowding and excessive intensification of occupation due to subdivision, ‘beds-in-shed,’ etc. Decreasing average household size in the context of a fixed stock of housing in some more affluent areas means that population density within some established residential suburbs is actually falling. This results in less effective use of existing community infrastructure and assets. CSO mapping of intra-census changes in residential density at local level should form part of the evidence base for this (and many other) policies, but does not appear to have been included in the published evidence base. Failure to take account of such statistical data represents a threat to the soundness of the plan. Amending Brent’s policy BH4 to reflect a positive and permissive approach to small sites across the residential suburbs may improve utilisation of existing public infrastructure and assets and contribute to the social sustainability of existing communities.</p>	<p>The revised London Plan sets a lower small sites housing delivery target. There is no longer a policy of the type of CP17 being taken forward in the Brent London Plan, consequently this provides greater opportunity for change. SPD1 provides flexibility subject to respecting local character. The Council is likely to produce an update to this to better deal with promoting small site development and intensification corridors. Guidance can go into greater detail on acceptable intensification solutions, better promoting opportunities to maximise capacity in those areas with greater access to public transport.</p>	<p>As the draft London Plan policy H2A has been removed from the Mayor’s Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough (see proposed change to BH4 below).</p>

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6.2 Housing	BH1	Robin Sharp	<p>The fact that Brent is not an island, but part of a dynamic international city, should be referenced in Brent's Characteristics.</p> <p>Land use planning is vital in ensuring the multiplicitous requirements of a city are balanced harmoniously.</p> <p>The Plan puts too much weight in the DNLP's projected housing figures, anticipating growth of 2 million to 2040. It is not environmentally or socially sustainable for Brent to absorb 60,000 more people and will negatively impact the health, and quality of life of the populace.</p> <p>Support objection to London Plan housing targets. If such targets are to be met sustainably, then the necessary infrastructure will be required, including schools, colleges, surgeries, and hospitals. These targets, in association with delayed infrastructure provision, will increase commuting for employment and education. Appropriate greenspace is also needed.</p> <p>Brent cannot sensibly accommodate an extra 60,000 people (equivalent size of a small town) and should not plan too.</p>	<p>Reference is made to wider London in paragraph 3.5 and through other parts of the Brent characteristics section.</p> <p>The Plan has to be consistent with national planning policy, which means planning to meet the estimated population's needs, which in Brent's case are projected to grow significantly, this would be the case even if a regional plan in the form the London Plan was not in place. The Council cannot ignore the fact that it has to plan to meet these needs. To do so would result in poorer outcomes in all respects.</p>	No Change.
6.2 Housing	BH1- BH2	TfL Commercial Development	<p>Policy should include transport hubs and sites with high public transport accessibility within appropriate sites for housing in BH1, as required by DNLP policy H1. These sites are well located, often with high capacity and should be optimised and supported within policy. BH2 should also identify these locations as areas which will support new housing. It is noted within paragraph 6.2.33, but not within the policy itself.</p>	<p>Areas with higher levels of public transport accessibility are in national and London Plan policy are identified as priority locations for more intensive development. As identified, the supporting text in 6.2.33 identifies these locations are priority areas for the provision of new homes. As such it is considered appropriate to amend the policy to incorporate this.</p>	Amend Policy BH2 to: "edge of town centre sites, <u>areas with higher levels of public transport accessibility levels</u> , and intensification..."
6.2 Housing	BH1- BH4	Innovative Infill	<p>Policy BH1 identifies the majority of housing delivery is focused in Development Areas (comprising site allocations, growth areas and intensification corridors). These are only a small fraction (12-15% by estimate) of the borough. The fewer residents of these areas are asked to bear the burden of dramatically increased density. Those privileged to live in the remaining low density areas are insulated from change. The latter substantially comprises private owner-occupiers, whereas the former include a greater proportion of renters and residents of HMOs. The evidence base is potentially deficient in that the Inclusive Growth Strategy and the Equalities Impact Assessment neither identify nor justify such embedded inequity, undermining the soundness of the plan.</p>	<p>The Plan seeks to place development in the most sustainable areas possible where there is or will be good public transport links, which will fundamentally limit the amount of movement by private car, plus the intensity of development and its location means that residents will have access to services, thus reducing the distance that they need to travel for everyday activities. Even if there were equalities impacts, which given that many of the larger lower density homes are occupied by extended families principally formed from BME groups who need larger homes to meet their needs, is debateable, the promotion of significant amounts of development in areas with poor access to public transport is not a sustainable option consistent with national and London Plan or Brent policy.</p>	No Change.
6.2 Housing	Para 6-2-36	Quintain	<p>Object as not justified. Requirement may prevent developments coming forward. Should be amended as follows: 'In very exceptional circumstances the council might accept wholly residential schemes without the development meeting tests related to need/ likely occupation. This might be for instance where an existing use is a 'bad neighbour' / 'non-conforming' use which is undermining the amenity of an area, or re-provision of such uses is shown to undermine viability of a scheme. In these types of cases the applicant would have to show that the problems could not be addressed</p>	<p>The proposed amendment is not considered appropriate. The policy and justification provides sufficient flexibility, whilst seeking to ensure existing non-residential uses are included in residential developments. Criterion b) of the policy would allow for the benefits of the development as a whole to be considered if re-provision was not occurring through evidenced viability issues. Giving too much flexibility will push up land values, and therefore is more likely to affect scheme viability where re-provision might otherwise be viable.</p>	No Change.

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			through its redesign or suitable conditions attached to a planning permission to overcome those adverse effects.'		
6.2 Housing	BH2	Sudbury Town Residents Association	Brent is pursuing a housing allocation (35,000) in excess of that required by the Mayor (29,500 or 24,000). Demolition of 2-3 storey homes and commercial properties and replacement with 5-7 storey buildings in Intensification Corridors is in conflict with the Sudbury Town Neighbourhood Plan ("STNP"). Any policy which supports development of Vale Farm as a regional centre for sports excellence is in conflict with STNP Policy VF1. The classification of A404 Harrow Road, Watford Road and Ealing Road as principal movement corridors, is misleading. The roads are often heavily congested, not wide and do not have the space for increased density. Bus and emergency services often have difficulty passing through.	The target set by the Mayor is a minimum, which the borough will seek to achieve. Although the London Plan housing target has reduced, the amount of housing that Brent has identified in its housing trajectory provides a buffer that gives greater confidence that the minimum London Plan target will be met. The intensification corridors are not in conflict with the Sudbury Neighbourhood Plan which contains no policies that address Sudbury's existing character. The Sudbury Neighbourhood Plan in Policy VF1 states "The Plan supports development that results in the strengthening of Vale Farm as a regional centre for sports excellence." which is what the Brent Local Plan acknowledges. 'A' main roads, the Harrow, Watford and Ealing Roads are principal movement corridors that have good levels of public transport. In these locations the Council would seek to reduce on-site parking and probably support car-free development. As such development could well reduce the amount of private cars using these roads by residents compared to the existing properties.	No Change.
6.2 Housing	BH2	DTZ Investors	Object as: Not sufficiently flexible, and is not positively prepared, justified or consistent with national policy. Should be amended as follows: 'Within town centres, edge of town centre sites and intensification corridors where existing non-residential floorspace forms part of a site proposed for residential development, the council will <u>require support</u> the re-provision of the same amount and use class of non-residential floorspace. Exceptions to this will be where it can be shown that: a) the site is allocated or has planning permission for an alternative use(s); b) a) there is no need for it or reasonable prospect of its use if provided; or c) b) in exceptional cases that its loss is outweighed by the benefits that its replacement with residential floorspace will bring.' The second part of the policy is not related to the policy heading. It could conflict with site allocations for previously developed sites. It is extremely inflexible and could stymie development contrary to the tests of soundness. It would also conflict with NPPF impact and sequential retail tests.	It is considered that a proposed amendment from "require" to "support" would weaken the policy and likely result in potential loss of uses that create mixed use environments/ can provide opportunities for community and lower value uses to be provided in new development, resulting in sterile mono-use (probably all residential) developments. In relation to the new proposed criterion a) this is considered to be an acceptable amendment that clarifies the status of existing consents and allocations compared to existing use. The removal of "in exceptional cases" is not considered appropriate. Again it waters down the policy to such an extent that it is likely to more often than not result in the loss of non-residential uses.	Amend policy BH2 to add a new criterion to the exceptions: " <u>a) the site is allocated or has planning permission for an alternative use(s);</u> "
6.2 Housing	BH2	St. George	Object as: not sufficiently flexible, not positively prepared, justified, effective, or consistent with national policy. Proposed modifications: "Within town centres edge of town centre sites and intensification corridors....Exceptions to this will be where it can be shown that:a) the site is allocated for an alternative use(s) or has planning permission for an alternative use(s);b) a) there is no need for it or reasonable prospect of its use if provided; orc) b) in exceptional cases	The edge of town centre sites are considered appropriate for inclusion as they are likely to be along busy streets and will add to the vitality of the street scene. Retention of space provides the opportunity to meet local non-residential needs unless the exceptions in the policy indicate that it is not necessary/ desirable to retain the space.In relation to the new proposed criterion a) this is considered to be an acceptable	Amend policy BH2 to add a new criterion to the exceptions: " <u>a) the site is allocated or has planning permission for an alternative use(s);</u> "

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			that its loss is outweighed "Reasoning: Policy second part does not appear to reflect the policy intent and its purpose is therefore questionable. It would conflict with site allocations for previously developed sites, where the allocation is for an alternative use, and where planning permission has been granted in whole or part for alternative uses. The policy sets out exceptions and should not include exceptions.	amendment that clarifies the status of existing consents and allocations compared to existing use. The removal of "in exceptional cases" is not considered appropriate. It would water down the policy to such an extent that it is likely to more often than not result in the loss of non-residential uses.	
6.2 Housing	BH2	Quintain	Object as not justified. Does not allow for the impact of viability on re-provision of non-residential floorspace and should therefore include an additional point stating: 'c) where this requirement would detrimentally impact upon the viability of the scheme.'	The proposed amendment is not considered appropriate. The policy and justification provides sufficient flexibility, whilst seeking to ensure existing non-residential uses are included in residential developments. Criterion b) of the policy would allow for the benefits of the development as a whole to be considered if re-provision was not occurring through evidenced viability issues. Giving too much flexibility will push up land values, and therefore more likely to affect scheme viability where re-provision might otherwise be viable.	No Change.
6.2 Housing	BH2- BH4	GLA	Welcome the general approach to growth. On small sites housing, the draft new London Plan panel's report recommendation is that the borough's target be reduced by approximately two thirds. The Mayor's final proposed approach will be set out in his Intend to Publish version of the new London Plan.	Noted. The Council welcomes the changes to the London Plan with regards to the reduction of the small sites housing target.	No Change.
6.2 Housing	BH3	DTZ Investors	Object. Onerous and places unreasonable pressure on developers who may not have a build to rent business model. This is not the role of the Local Plan. The plan provides no evidence that build to rent developments would increase delivery, as is dictated by the market just like build for sale. Policy should be amended as follows: 'To encourage increased housing delivery, within each Growth Areas (excluding South Kilburn), or development sites of 500 dwellings or more, the provision of Build to Rent properties will be expected will be supported where unless this would not:	Build to rent is a product that assists in meeting housing needs for rented accommodation, but also has the ability to rapidly increase housing delivery as it is not so dependent on sales which can be affected by the economic cycle or market saturation. The policy is essentially trying to increase the likelihood of sites becoming available to deliver build to rent which historically has been unable to compete on purchase of sites with traditional house builders. This has been sought by organisations such as the British Property Federation which has been highly supportive of build to rent in increasing housing delivery. The exceptions provided within the policy provide the flexibility to ensure that the delivery of market housing sites is not compromised where build to rent is not a viable proposition.	No Change.
6.2 housing	BH3	Wembley Towers Limited	Policy is restrictive and ultra vires. A Plan can support various housing models, but not dictate a type of model and preclude others. It is for the market to decide. Whilst Build to Rent support is welcomed, the demands of the demands are unsuitable. The policy is unsound and inconsistent with national policy in the context of Planning Policy Guidance (Paragraph: 001 Reference ID: 60-001-20180913). It should recognise circumstances and locations where these developments will be encouraged, e.g. as part of large sites and/or a town-centre regeneration area. The policy should acknowledge other forms of residential accommodation which can add to the housing stock and meet local demand, such as co-living accommodation. Amend BH3: 'To encourage increased housing delivery, within each Growth Areas (excluding South Kilburn) or development sites of 500 dwellings or	Build to rent is a product that assists in meeting housing needs for rented accommodation, but also has the ability to rapidly increase housing delivery as it is not so dependent on sales which can be affected by the economic cycle or market saturation. The policy is essentially trying to increase the likelihood of sites becoming available to deliver build to rent which historically has been unable to compete on purchase of sites with traditional house builders. The exceptions provided within the policy provide the flexibility to ensure that the delivery of market housing sites is not compromised where build to rent is not a viable proposition. Clearly there are many forms of housing development that will assist in delivery including co-living, however to date and in terms of investor	No Change.

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			more, the provision of Build to Rent properties will be expected encouraged unless this would:...'	interest, Build to Rent provides the ability to make a step change, with a high quality product hence the policy focus.	
6.2 Housing	BH3	St. George	Current policy is onerous, placing unreasonable pressure on developers (who may not have a Build to Rent business model) to deliver this alternative product. The policy wording potentially will result in delivery of a poor-quality product, in turn restricting housing delivery. The Local Plan should not dictate on Build to Rent but incentivise developers in its delivery.	Build to rent is a product that assists in meeting housing needs for rented accommodation, but also has the ability to rapidly increase housing delivery as it is not so dependent on sales which can be affected by the economic cycle or market saturation. The policy is essentially trying to increase the likelihood of sites becoming available to deliver build to rent which historically has been unable to compete on purchase of sites with traditional house builders. The exceptions provided within the policy provide the flexibility to ensure that the delivery of market housing sites is not compromised where build to rent is not a viable proposition.	No Change.
6.2 Housing	BH3	TfL Commercial Development	Support provision of Build to Rent schemes, but policy wording is too inflexible. Provides no support for schemes suitable for Build to Rent that may be smaller in size than the 500 units specified. It also fails to recognise that there may be requirements for other forms of housing on sites of over 500 units. As currently drafted, the policy wording does not reflect Paragraph 6.2.38. To be considered sound, amend policy from "expected" to "supported" to provide greater flexibility and align with paragraph 6.2.38. These changes are also required if the draft Local Plan is to be considered sound.	The policy justification identifies that build to rent is considered a valuable addition in terms of increasing the capacity of the development sector build new homes and that the Council is keen to encourage its provision. This can be added to the policy to provide clarity on this matter. The need to provide alternative forms of housing is recognised and the policies of the Plan as a whole will be taken into account when considering what planned developments are delivering. The use of "support" is not considered robust enough to open up opportunities for built to rent development.	Insert new sentence at beginning of Policy BH3 to " <u>The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent.</u> To encourage..."
6.2 housing	BH3	Stonebridge Real Estate Development	Policy is restrictive and ultra vires. A Plan can support various housing models, but not dictate a type of model and preclude others. It is for the market to decide. Whilst Build to Rent support is welcomed, the demands of the demands are unsuitable. The policy is unsound and inconsistent with national policy in the context of Planning Policy Guidance (Paragraph: 001 Reference ID: 60-001-20180913). It should recognise circumstances and locations where these developments will be encouraged, e.g. as part of large sites and/or a town-centre regeneration area. The policy should acknowledge other forms of residential accommodation which can add to the housing stock and meet local demand, such as co-living accommodation. Amend BH3: 'To encourage increased housing delivery, within each Growth Areas (excluding South Kilburn) or development sites of 500 dwellings or more, the provision of Build to Rent properties will be expected encouraged unless this would:...'	Build to rent is a product that assists in meeting housing needs for rented accommodation, but also has the ability to rapidly increase housing delivery as it is not so dependent on sales which can be affected by the economic cycle or market saturation. The policy is essentially trying to increase the likelihood of sites becoming available to deliver build to rent which historically has been unable to compete on purchase of sites with traditional house builders. The exceptions provided within the policy provide the flexibility to ensure that the delivery of market housing sites is not compromised where build to rent is not a viable proposition. Clearly there are many forms of housing development that will assist in delivery including co-living, however to date and in terms of investor interest, Build to Rent provides the ability to make a step change, with a high quality product hence the policy focus.	No Change.
6.2 Housing	BH3	Quintain	Object as should be expanded to provide guidance on how BtR developments will be considered in terms of residential amenity and design. This would encourage innovation and differentiation. Should therefore include the following text in support of policy: 'Build to Rent is a new and evolving sector within the residential market which the Council wish to encourage. The Council will work closely with Build to Rent providers to ensure schemes are delivered that provide high quality residential environments. In exceptional circumstances the Council may be willing to consider a differentiation to the normal residential standards where it can be justified by the developer and	The Council is not convinced with the premise that Build to Rent development should be subject to different standards compared to those that would apply to standard housing developments. Renting is now the de-facto tenure for a significant proportion of the population, with tenants likely to stay many years in one property where for instance they have a need to remain in an area (for example for their children's education), rather than be subject to short term change. In addition, schemes can be subject to a minimum 15 year covenant, meaning there is the potential for them to change to owner-occupied properties in the longer-run.	No Change.

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			balanced against other qualities of the development and meeting housing needs.'		
6.2 Housing	BH3	John Cox	Given the overwhelming need for social rent homes, and the increasing numbers of approved Build to Rent developments with no 'low cost' rent at all, schemes are failing to meet the most pressing housing need. The Local Plan's requirement for BtR developments to provide 100% of their 'affordable' housing as LLR should be changed. A significant proportion should be social rent. Why didn't the viability assessment test this? It needs to be tested going forward to enable Brent to meet its housing need and sustain a mixed community. Other boroughs have taken this step. the DNLP allows boroughs to require low cost rents such as social rent.	The sentiment of this representation is understood as social rent levels are identified in the West London SHMA as the predominant ones at which dwellings can be truly regarded as affordable to meet Brent's needs. The London Plan policy of offering the fast track approach creates limitations on what the Council can seek, as the policy has to be deliverable, which means tailoring tenures to ensure this is the case. The 100% London Living Rent does this. Low wage levels in Brent mean that although not at the level of social rent across the borough, London Living Rent levels in some areas do have a significant discount on normal rent levels. In some areas in Brent London Living Rent levels are below the equivalent London Affordable Rent levels. For example for a 1 bed flat in Wembley the London Living Rent 2019/20 is benchmarked at £661 per month, whilst the London Affordable Rent for the equivalent property is £672. Policy BH5 allows for social rent level rents to be offered where this is being proposed by the applicant where they are lower than London Living Rent, as it states "as a minimum". This wording is however clumsy and could perhaps be clarified with better wording. For sites subject to negotiation as they will not meet the fast track approach, the Council can discuss with applicant how rental levels can best meet needs. In some cases this may result in social rent levels being delivered, but to offset this either the number of affordable dwellings will drop, or more affordable will have to be at sub-market (max 80% of market rent).	Policy BH5 amend: "Build to Rent developments, a minimum of 100 per cent at London Living Rent equivalent rents or lower "
6.2 Housing	BH4	Innovative Infill	Brent Plan Policy BH4 seeks to restrict draft London Plan Policy H2A's presumption in favour of development to areas of PTAL 3-6, removing the 800m radius from stations and town centre boundaries. This subtle deviation significantly subverts its spirit. It reduces by over 50% the policy applicable area. Justification as set out in Paragraphs 6.2.50 and 6.2.51, is deficient. Brent's suburban characteristics are similar to those found throughout outer London. The GLA would have been aware of this in its policy development. The 800-metre radius from train stations and town centres is a compromise in place a previously more widely permissive policy, and achieves a perfectly reasonable balance between sustainable and unsustainable travel. Brent's policy is arbitrary; discounting what is in fact relatively easy short distance from rail stations. The council criticises H2A as a 'blunt tool' but replaces it with an equally blunt alternative. Brent's policy should be informed by specific local evidence as to why the 800m permissive radius should not apply to a specific station or centre. In summary, the justification for deviating from the London Plan: a) fails to distinguish between small sites of different types and contexts b) seeks to perpetuate past policies which insulate the residential suburbs in their generality from any change or intensification c) attempts to drastically curtail the areas where the newly permissive regime will apply d) rests on an arbitrary change to qualifying parameters which is	Policy H2A has been removed from the draft London Plan, taking account of the Panel recommendations, who considered it inappropriate for application across all London. The Council has a positive attitude towards small site development, particularly where it has good access to public transport. Its policies such as the identification of the intensification corridors indicate that it is supportive of changes in character to accommodate new homes in areas with access to transport and facilities. The tall buildings policy also allows for taller buildings within an existing suburban context up to 2 storeys in height taller than the prevailing character, which will assist in allowing more intensive use of sites occupied by existing dwellings.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.

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			not supported by evidenceAnd therefore falls short of the standard of soundness required of this Plan.		
6.2 Housing	BH4	Innovative Infill	Some parts of the borough face challenges of overcrowding and excessive intensification of occupation due to subdivision, 'beds-in-shed,' etc. Decreasing average household size means population density within many established residential suburbs is actually falling. This results in less effective use of community infrastructure and assets. Intra-census changes in residential density at local level should form part of the evidence base for this (and many other) policies. Failure to take account of such statistical data represents a threat to the plan's soundness. Amending BH4 to reflect a positive and permissive approach to small sites across the residential suburbs may improve utilisation of existing public infrastructure and assets and contribute to the social sustainability of existing communities.	Whilst population density across the UK may well be falling, in Brent this is not the case. Overall increases in population in the borough mean that populations in all wards are increasing and thus existing infrastructure is not at risk of being under-utilised to such an extent that it is regarded as a wasted resource. The West London Small Sites SHLAA showed that across most of the borough there was a significant degree of over-crowding when taking into account conventional measures (e.g. persons per room).	No Change.
6.2 Housing	BH4	Innovative Infill	The approach to identifying and allocating housing sites avoids the conventional suburban typology. The London Plan small-sites targets would be more achievable if this typology had been investigated more closely. Examples include redevelopment of mews-lane garage sites within the inter-war suburbs. This offers potential for significant capacity. Such housing was standard in Georgian, Victorian and Edwardian periods. Allocations should seek to identify at least one suitable area as a test-bed for future rounds of allocations, and as a means to improve the effectiveness of the plan.	The opportunities for this type of development in Brent appear to be limited. Gardens predominantly are not long, which limits desire of people to reduce them in size, to open up the sites demolition of properties would be required, plus the appropriate development solution, e.g. low rise is unlikely to generate significant value, compared for example frontage development identified in the intensification corridors.	No Change.
6.2 Housing	BH4	GLA	Noted that Brent is maintaining its challenge against the Mayor's approach to small housing sites. The London Plan Panel Report recommends the removal of Policy H2A of the draft London Plan. Brent suggests at paragraph 6.2.39 that it is able to deliver approximately 370 new homes a year through small site developments. The Panel report recommends that Brent's small housing site target for the period 2019 to 2029 is 433 dwellings a year. The Mayor will send out an updated letter or set out his approach on this matter through a Statement of Common Ground following the publication of his Intend to Publish version of the new London Plan.	The updated target reflecting the Panel's recommendations is understood, although compared to the analysis done for Brent this revised target is still challenging. This part of the draft Brent Local Plan will be updated to reflect changes in circumstance related to the emerging London Plan.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.
6.2 Housing	BH4	Innovative Infill	The council has not followed its statutory duty with an active commitment to encouraging self-build developments. The brownfield register does not capture many of the smaller, privately owned, domestic scale plots, generally in suburban infill settings, which are highly appropriate to small-scale self-build projects. Amending BH4 to reflect a positive and permissive approach to small sites across the residential suburbs will assist in improving the availability of plots suitable for the self- and custom-build market.	The Council has now published on its website a full list of sites not yet developed with planning permission for less than 5 dwellings which are not already identified in the brownfield register. This list will be updated annually. It shows over 300 sites which will assist those who are keen to pursue a self or custom build and provides many opportunities for what in Brent appears to be a relatively small need.	No Change.

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6.2 Housing	BH4	Innovative Infill	Hundreds of garage, corner and side garden plots exist across the Borough. Many have potential for one or two dwellings without detriment to garden land or residential amenity. The time and effort required to bring such sites forward is considerable, and undermined through zealous application of the entire gamut of planning policies devised with larger developments in mind. Positive reference to the principle of appropriately designed, small-scale infill development on sites across the Borough is required. This can improve housing mix and choice without detriment to the character of local residential areas. Specific design guidance to define acceptable patterns of development. It can acknowledge the sensitivity and character of the context where these developments are likely to come forward. This will provide greater clarity and assist in unlocking the potential of small plots. Policy BH4 should commit to producing supplementary planning guidance on this matter in the near future to improve the effectiveness of the plan.	There will be sites and despite the presence of Policy CP17 these sites have come forward. CP17 will no longer form part of the Plan on adoption of this Plan which might better improve prospects in addition to a revised BH4 required in the absence of London Plan Policy H2A which is no longer being taken forward.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.
6.2 Housing	BH4	Historic England	Draft new London Plan Policy H2 has been amended resolving Historic England's previous concerns. Please clarify that the draft Brent Plan commitment to policy H2 is the amended version.	The Council due to the removal of Policy H2A and amendment of policy H2 has decided to write an enabling, rather than a presumption in favour policy.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough. This will be set out in the schedule of modifications that will be submitted with the Plan for examination.
6.2 Housing	BH4	Angela Barrett	Too many people already.	The Council has to plan to accommodate predicted growth in population.	No Change.
6.2 Housing	BH4	Innovative Infill	By restricting the presumption of areas of PTAL 3-6 and removing the 800m radius from stations and town centre boundaries as set out in the London Plan, Brent's Local Plan Policy BH4 subverts the spirit of London Plan Policy H2A and reduces by over 50% the suburban area where this policy is applicable. The Council's justification for this deviation is deficient. The suburban context of the northern part of the borough is not exceptional across outer London Boroughs and 800m radius is a compromise in place of previously more widely permissive policy, achieving a balance between sustainable intensification and discouraging unsustainable travel patterns. Brent's higher bar fails to recognise the value of close proximity to one of the borough's rail stations or urban centres which is already embedded in London Plan policy. Any deviation should be a local exception and must be evidence-based. In summary, Brent's justification for deviation from the London Plan a) fails to distinguish between the different contexts of small sites; b) insulates suburbs from change by perpetuating past policies; c) curtails areas where the new permissive regime will apply; d) is based on arbitrary changes to qualifying parameters not supported by evidence. The plan is therefore not sound. Hundreds of potential small residential infill sites exist across the borough but the time / effort required to bring forward these sites	The Panel stated in considering policy H2A, "...Furthermore, there is insufficient evidence to treat all forms of residential development across all of London within PTALs 3-6 or within 800m of a station or town centre boundary as acceptable in principle." Whilst in inner London there might well be reasons why someone might not seek to own/ use a car if located up to 800 metres from a station, or Town Centre (although in reality most are likely to be at least within PTAL 3, such as in the southern half of Brent) use of public transport in these types of locations is very low with residents being heavily car dependent. To promote development in these locations is likely to lead to large increases in private car use to the detriment of environmental quality and personal health.	As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.

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			can be outweighed by policies devised with larger developments in mind. Positive reference should be made to the principle of appropriate, small-scale infill across the borough. Policy BH4 should commit the council to creating specific design guidance to in relation to this.		
6.2 Housing	BH5	St. George	Object as the policy is not sufficiently flexible, not effective or consistent with national policy. Ambiguity within the policy should be rectified by an explicit acknowledgement that Brent Council is adopting the Threshold approach to Planning Applications. The Threshold approach can be explained within the policy or within the justifying text. The supporting text acknowledges that the proposed affordable housing target and mix is extremely challenging to achieve, and should therefore greater flexibility should be applied within the policy. The policy should directly support the Built to Rent principles of Policy BH3 by making it clear that Built to Rent will be treated comparably to traditional market for sale products in relation to affordable housing. Proposed modification: In Brent the strategic affordable housing target that will apply is 50% of new homes in the period to 2041. Brent Council will adopt the Threshold approach to Planning Applications. The affordable housing tenure split required to comply with London Plan Policy H6 Threshold Approach to Applications is as follows (unless an alternative mix is robustly justified through viability evidence): Non-Built to Rent developments of 10 dwellings or more is: a) 70 per cent Social Rent/ London Affordable Rent and; b) 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent, affordable rent within Local Housing Allowance limits and London Shared ownership. These must be for households within the most up to date income caps identified in the London Housing Strategy or London Plan Annual Monitoring Report. Where viability evidence demonstrates major developments are unable to achieve the target affordable housing mix, a monetary planning obligation may be secured or an alternative tenure mix. For Build to Rent developments the affordable housing provision should be agreed on a case by case basis. Affordable Build to Rent homes will be counted as making a comparable contribution to Brent's affordable housing target.	As Policy H5 of the draft London Plan will become part of the development plan on its adoption, by default the Mayor's threshold approach will apply. Nevertheless, additional clarity can be provided in BH5. Consistent with national and London Plan policy, provision of affordable housing is sought on site, with contributions in lieu being exceptions. The policy justification indicates that the Council's preferred tenure mix will be sought where the viability assessment route is followed, rather than an alternative mix that seeks to push up the percentage affordable attained. For build to rent, to be consistent with the London Plan the Council has to set out a tenure mix to support the fast track approach. Where affordable build to rent homes are providing rental levels consistent with affordable housing rental levels they will be regarded as delivering affordable homes.	Amend BH5 to: "...in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing..."
6.2 Housing	BH5	GLA	The intention to follow the strategic draft London Plan target for the delivery of 50% affordable homes and the Threshold Approach as set out in Policy H6 is welcomed. Policy BH5 should make it explicitly clear that it will apply the Mayor's affordable thresholds below which viability assessments will no longer be required to support residential development proposals and with early and late stage reviews for schemes that do not achieve the threshold.	As Policy H5 of the draft London Plan will become part of the development plan on its adoption, by default the Mayor's threshold approach will apply. Nevertheless, additional clarity can be provided in BH5.	Amend BH5 to: "...in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing..."
6.2 Housing	BH5	DTZ Investors	Object. Policy does not confirm that the threshold approach as outlined in DNL policy H6 is being adopted. It should be confirmed with explicit text within the plan.	As Policy H5 of the draft London Plan will become part of the development plan on its adoption, by default the Mayor's threshold approach will apply. Nevertheless, additional clarity can be provided in BH5.	Amend BH5 to: "...in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing..."

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6.2 Housing	BH5	GLA	Housing proposed on industrial (where there is a resulting net loss of industrial floorspace) and publicly owned land will be expected to deliver at least 50% affordable housing in accordance with draft new London Plan Policies H5 and H6.	The Brent Local Plan does not need to repeat London Plan policy. The Brent Local Plan makes suitable reference to the policies in the London Plan.	No Change.
6.2 Housing	BH5	TfL Commercial Development	Policy requires 100% BtR development units are London Living Rent under the fast track approach. Reference to LLR should be specified as rent levels to avoid confusion with an LLR product. Support principle of LLR within BtR, however, concerned this will not provide a 'range of genuinely affordable rents' and would not provide a mixed and balanced community in accordance with DNLP policy GG4. DNLP policy H13 states 30% of DMR homes should be equivalent to LLR with the remaining at genuinely affordable rents. Rather than providing this mono tenure, a more balanced and flexible approach would be to revert to the DNLP policy standard. Given LLR levels are set by the GLA annually, with no way to predict this in advance, the suggested approach will provide Brent with greater autonomy over those rents secured. The current policy would also create a viability issue for most schemes, requiring a viability tested route. BtR developments have a different financial model, presenting additional challenges when compared with traditional sale homes. This will therefore slow and prevent delivery. This is particularly evident given the requirements of policy BH3 which state that all developments over 500 units should be BtR. It should therefore be amended to reflect DNLP policy H13.	It is acknowledged that the reference to London Living Rent-# should be rental levels and not the product itself and as such needs to be amended. In relation to a mono-tenure, it is considered that the dwellings will be accessible to those on a range of incomes not necessarily those on the maximum incomes allowed for occupation. The inclusion of the 100% London Living Rent equivalents was as a direct result of the viability assessment work that the Council commissioned to support the policies in the draft Local Plan.	Policy BH5 amend: "Build to Rent developments, a minimum of 100 per cent at London Living Rent <u>equivalent rents or lower</u> "
6.2 Housing	BH5	Quintain	Strongly object as is unreasonable, not effective or justified having regard to viability evidence. The fast track route, particularly for BtR developments is unrealistic and will reduce delivery, being at odds with policy BH3. BtR developers will not be able to compete for sites if they are to provide 35% at London Living Rents for the fast track route. REFER TO APPENDIX 1 FOR DETAILED REP.	The inclusion of the 100% London Living Rent equivalents was as a direct result of the viability assessment work that the Council commissioned to support the policies in the draft Local Plan.	No Change.
6.2 housing	BH5	Wembley Towers Limited	The policy should be explicit in the 35% threshold approach not requiring a viability appraisal. The policy does not set out the approach for BtR. DNLP states that boroughs can publish guidance on the proportion of DMR to be provided at different rental levels through the fast track route. This should have regard toward the level of discount required and the viability of its delivery at the threshold level, reflecting NPPF which defines affordable housing for rent as 'at least 20% below local market rent (incl. service charges where applicable)'. This is suitable for BtR operators providing accommodation for key/essential workers in London.	The policy will be amended to make reference to London Plan policy H5, but does not need to repeat it. It sets out the approach for Build to Rent, identifying the threshold percentage as a minimum of 100% at London Living Rent. It is acknowledged however that this could be clarified to rents at those of equivalent to London Living Rent.	Policy BH5 amend: "Build to Rent developments, a minimum of 100 per cent at London Living Rent <u>equivalent rents or lower</u> "

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6.2 housing	BH5	Stonebridge Real Estate Development	The policy should be explicit in the 35% threshold approach not requiring a viability appraisal. The policy does not set out the approach for BtR. DNLP states that boroughs can publish guidance on the proportion of DMR to be provided at different rental levels through the fast track route. This should have regard toward the level of discount required and the viability of its delivery at the threshold level, reflecting NPPF which defines affordable housing for rent as 'at least 20% below local market rent (incl. service charges where applicable)'. This is suitable for BtR operators providing accommodation for key/essential workers in London.	The policy will be amended to make reference to London Plan policy H5, but does not need to repeat it. It sets out the approach for Build to Rent, identifying the threshold percentage as a minimum of 100% at London Living Rent. It is acknowledged however that this could be clarified to rents at those of equivalent to London Living Rent.	Policy BH5 amend: "Build to Rent developments, a minimum of 100 per cent at London Living Rent <u>equivalent rents or lower</u> "
6.2 housing	BH6	Stonebridge Real Estate Development	Draft London Plan Policy H10 confirms boroughs should not be prescriptive in setting market dwelling size requirements. The policy should be modified so a specific target for new homes as family sized dwellings should refer only to a target for low lost rent housing. This will ensure soundness. It is justified through compliance with draft London Plan Policy H12.	Taking account of the Panel's report Policy H10 has been amended to exclude reference to boroughs not setting area wide dwelling mix requirements. On the basis of needs and viability evidence the policy is considered justified.	No Change.
6.2 Housing	BH6	Quintain	Object as is unreasonable, not effective or justified with no evidence as to impact on viability. When taken with other policies (particularly affordable housing requirements and re-provision of commercial floorspace), the impact is significant and should be redrafted to provide flexibility in recognition of viability and local market conditions, as addressed in NPPF paragraph 122. It should therefore include the following clause: 'b) Its inclusion would fundamentally undermine the development's viability or the delivery of other Local Plan policies.'	The viability assessment takes into account the impact of the policies as a whole including the size mix. Creating more flexibility related to viability will in all likelihood reduce the delivery of family housing as anticipated by in the policy as developers will factor in provision of more non-family dwellings and increase land prices. The 25% is a significant reduction on meeting the identified needs of the borough's residents.	No Change.
6.2 Housing	BH6	Innovative Infill	Welcome objective to provide significant family housing, although may be challenging.	Agree that it will prove to be challenging due to the values attained through providing 1-2 bed homes for which there is also a substantial need.	No Change.
6.2 Housing	BH6	Stonebridge Real Estate Development	We note that the Council Seeks to promote new family housing with at least 25% of new homes being 3+. This conflicts with DNLP policy H12 which states such prescriptions are inappropriate for market and intermediate homes, however for low cost rents boroughs should provide guidance to ensure affordable housing needs are met. This quantum is therefore not aligned to an identified social need. It should also be recognised that families can accommodate 2D4P units and that these should be added to the definition of 'new family housing'.	On requiring 25% 3+ bedroom dwellings, the draft London Plan has been altered taking account of the recommendations of the Examination panel who considered it appropriate for boroughs to identify specific housing needs where these could be justified on the basis of local evidence. As such Brent's policy is considered appropriate.	No Change.
6.2 Housing	BH6	Wembley Towers Limited	We note that the Council Seeks to promote new family housing with at least 25% of new homes being 3+. This conflicts with DNLP policy H12 which states such prescriptions are inappropriate for market and intermediate homes, however for low cost rents boroughs should provide guidance to ensure affordable housing needs are met. This quantum is therefore not aligned to an identified social need. It should also be recognised that families can accommodate 2D4P units and that these should be added to the definition of 'new family housing'.	On requiring 25% 3+ bedroom dwellings, the draft London Plan has been altered taking account of the recommendations of the Examination panel who considered it appropriate for boroughs to identify specific housing needs where these could be justified on the basis of local evidence. As such Brent's policy is considered appropriate.	No Change.

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6.2 Housing	BH6	OPDC	OPDC supports the family housing target and takes the same approach in its draft Local Plan.	Support welcomed.	No Change.
6.2 Housing	BH6	John Cox	<p>Insufficient pressure on developers to supply family-sized homes. Amend Policy BH6 to say: “For every odd number of four dwellings included within a developments, at least one must be 3 bedrooms or more. For every even number of four dwellings included within a development, at least one must be 4 bedrooms or more.”</p> <p>That means passing the 8, 16, 24, ... dwellings levels each adds an additional guaranteed home of 4 bedrooms or more. Exceptions should not apply to larger developments, as this discourages wider mixed communities.</p> <p>On individual sites, consider relaxing tenure targets if it allows even more family housing in return. That is because of the obvious additional cost to developers of physically larger homes, but also the huge social stress within Brent of families desperately needing more space.</p> <p>Figure 33 is unsound. Remove London Affordable Rent as it is different to social rent in cost and thus the impact it has on low-income households.</p>	<p>Whilst this would in theory allow homes to meet a wider range of needs, in reality it would likely mean greater resistance/lower delivery of family dwellings overall as the viability element associated with 4 bedroom homes (particularly in flatted developments which will be the predominant form of development moving forward) will be reduced. The reality is that currently in many schemes the 3-4 bed element is substantively delivered in the affordable component of the development. Whilst there are some small differences between social rent and London affordable rent levels, the SHMAA was done on the basis of up to what people could afford, as such the category reflects affordable products which in price terms are below those of the equivalent of London Living Rents.</p>	No Change.
6.2 Housing	BH6	Innovative Infill	<p>Policy BH6 requires at least 25% of new homes to be family sized units, reflecting Brent's need. This will be difficult to achieve given high densities proposed in the majority of site allocations, growth areas and intensification corridors. Small infill sites offer an effective way of increasing the supply of family sized units. Failing to promote opportunities to deliver family sized units is a threat to the plan's soundness.</p> <p>Amending policy BH4 to a permissive approach to small sites will help to achieve the objective of BH6. An even wider geographic area than enlisted under H2A would improve delivery.</p>	<p>Noted, however market realities dictate that in the majority of cases developers will seek to maximise the provision of 1 and 2 bed properties as the value attained per sqm. compared to build cost is higher. This is also likely to be the case on small scale infill, where a smaller number of dwellings will mean the threshold for family homes is less likely to be achieved. As such a more permissive approach to locating homes in unsustainable locations is unlikely to achieve the provision of significant numbers of family sized dwellings and where it does is almost certain to increase car use as these households are much more likely to be dependent on using this as a means of movement.</p>	No Change.
6.2 Housing	BH6- BH4	Innovative Infill	<p>Paragraph 6.2.10 notes family size units (3 bed+) represent 53% of new homes needs. Policy BH6 will be notably difficult to achieve given market realities and the high densities proposed in respect of the majority of site allocations, growth areas and intensification corridors. Small infill sites, suitable for the construction of individual 3-4 bedroom homes, offer an effective means of increasing the supply of this type of unit. Amending BH4 to reflect a positive and permissive approach to small sites across a wider area of the residential suburbs will assist in achieving the objective of BH6.</p>	<p>Small sites do offer the potential for 3-4 bedroom dwellings. Nevertheless, market factors still dictate in these locations that 1 and 2 bed are generally the preferred homes developers seek to provide. Policy BH4 will be amended and identify that whilst sites outside priority locations identified will be acceptable, greater emphasis will be on character which may limit the density/ site coverage which might better promote opportunities for 3-4 bed homes compared to other sites.</p>	<p>As the draft London Plan policy H2A has been removed from the Mayor's Intend to Publish version, it is proposed that BH4 is updated to provide the policy for promoting small site development in the borough.</p>

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6.2 Housing	BH7	Unite Students	<p>Maintain argument made previously that criterion D) to demonstrate a specific Brent need, is contrary to the approach of the London Plan and the NPPF. It could prohibit purpose built student accommodation (PBSA) coming forward. It should therefore be removed.</p> <p>The removal of the 20% quota of students as a proportion of growth area population is supported. Policy criterion E) on over-concentration is onerous and should be removed. This is because there is no evidence or justification provided that a concentration of PBSA creates harm to residential communities.</p> <p>The approach to co-living accommodation is largely in line with emerging London Plan Policy H18. However, the requirement of criterion D) should be removed. It is contrary to the approach of the London Plan and the NPPF. It could prevent this type of development coming forward in the Borough. It is therefore recommended that this policy requirement is removed.</p> <p>Criterion E) should be removed as it is a restriction that could prevent co-living developments coming forward. As recognised in the London Plan, co-living developments can alleviate pressure on the use of family homes being used as HMOs.</p>	<p>Criterion d) makes specific reference to a London need for students, rather than a Brent need, recognising the role that outer London boroughs have been identified as playing in meeting the accommodation needs of students who study in central London, but for who there are limited opportunities available in those areas to provide purpose built student accommodation.</p> <p>For criterion e) the Council still regards this as necessary in order to ensure that there are balanced and mixed communities that have the ability to sustain a range of local infrastructure and not place an unacceptable burden on some forms, e.g. health. It is accepted that most purpose built modern student accommodation blocks are well managed and have limited impacts in terms of adverse impact related to anti-social behaviour. The Council recognises the value of co-living schemes and similar to student accommodation it appears many of the larger schemes are well managed. Nevertheless, in terms of creating balanced and mixed communities, over-concentration of properties which essentially have short-term/ more transient residents does not create sustainable places.</p>	No Change.
6.2 Housing	BH7	Unite Students	<p>Criterion E) should be removed as it is a restriction that could prevent co-living developments coming forward. As recognised in the London Plan, co-living developments can alleviate pressure on the use of family homes being used as HMOs.</p>	<p>For criterion e) the Council still regards this as necessary in order to ensure that there are balanced and mixed communities that have the ability to sustain a range of local infrastructure and not place an unacceptable burden on some forms, e.g. health. It is accepted that most purpose built modern student accommodation blocks are well managed and have limited impacts in terms of adverse impact related to anti-social behaviour. The Council recognises the value of co-living schemes and similar to student accommodation it appears many of the larger schemes are well managed. Nevertheless, in terms of creating balanced and mixed communities, over-concentration of properties which essentially have short-term/ more transient residents does not create sustainable places.</p>	No Change.
6.2 Housing	BH7	Quintain	<p>Object to part e where the definition of an overconcentration is defined as 4 of 11 adjacent properties. The policy already allows the Council to approve management standards to limit impact on neighbours, in addition to existing licensing powers. The application of arbitrary, borough wide ratio is not justified. This has particular implications for BtR schemes where apartments are often let as 'sharer apartments' which may be captured by this policy. This provides an important element of the housing market, relieving pressure on conversion of traditional family homes into HMO's, providing 'affordable' accommodation to those who are not eligible for subsidised affordable housing. It is also well managed, exhibiting none of the typical issues associated with HMO's. Further conversation may be required.</p>	<p>The licensing can assist with standards of the properties to reduce the potential for anti-social behaviour that might adversely impact on neighbours. Nevertheless, it does not address the issue of HMOs potentially increasing rents and as such making it less likely that single household can afford self-contained accommodation. The Council does want to encourage Build to Rent, nevertheless it does want to ensure that there are balanced and mixed communities and that new homes offer opportunities for Brent family households to be able to afford new dwellings. At its most extreme where the existing build to rent has no controls it could result in extensive areas essentially becoming co-living developments. In these types of developments where the potential for anti-social behaviour is likely to be lower, the Council could offer</p>	No Change.

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				some flexibility, but it is unlikely to regard 100% of the development as acceptable as HMO accommodation.	
6.2 Housing	BH8	GLA	Support benchmark figure, and should be acknowledged as a benchmark figure, and not a target. This figure should be supplemented by local housing need informative to help provide a more specific annual target for the area, including information on the type and tenure of homes required. The current policy requires developers to work together which is not in accordance with DNLP policy H13, and is not evidence based. Boroughs are expected to work with providers to identify sites which may be suitable. The policy should be amended accordingly.	<p>The Council's SHMA indicates the older persons' housing needs, related to type of accommodation. This is slightly below the amount of need identified by the London Plan, but also reflects an assumed lower level of annual delivery of homes overall to meet needs.</p> <p>The Council as a provider and also as an enabler works principally with registered providers to deliver sites (particularly affordable/ specialist housing) to specifically meet older people's needs. The delivery of these types of schemes is complicated and subject to a number of factors that change consistently over time, such the availability of housing and social care funding and models of delivery. This uncertainty limits the extent to which sites specifically allocated for older people's housing across the Plan period will not fall foul of the requirement to show that they are deliverable that would likely arise from objections from individual sites owners (as the Council does not own sites on which larger scale schemes can be delivered). As such it is considered that a more pragmatic approach related to the circumstances of individual larger sites is more appropriate. On these sites the scale of the affordable housing requirement, together with the flexibility allowed through larger developments means that it is more likely the an older persons scheme not likely to be provided by the market can be considered, or where it is feasible for the market to deliver it will not limit overall site viability.</p>	Paragraph 6.2.16 amend : "..benchmark target figure ..." Policy BH8 amend: "..benchmark housing provision target figure ..."
6.2 housing	BH8	Wembley Towers Limited	It is noted that to meet the DNLP target for specialised older persons housing, provision should come forward in defined circumstances. Current policy states it should be provided as 10% of units within Growth areas (excluding South Kilburn), or on sites with a capacity of 500+ dwellings. Policy BSSA7 should be modified to indicate that the provision of specialist older peoples housing is encouraged, subject to feasibility, but not mandated.	It is considered that a policy that encourages provision will be insufficiently robust enough to ensure delivery of the older people's housing, whilst the requirement for its inclusion will provide greater likelihood of this occurring.	No Change.

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6.2 Housing	BH8	John Cox	Developers should be required to consider placing this type of housing alongside community facilities like child nurseries and infant schools, given the strong international evidence of improved social well-being to both generations (and possibly those generations in between) from such arrangements.	The benefits of encouraging the types of interactions identified have been recognised by some operators of older people's housing schemes. The desirability of the consideration of the location of placing this type of housing alongside community facilities can be identified within the policy justification, along with reference good practice publications that show how such developments can be better integrated into the community.	Amend by adding paragraph 6.2.78a. <u>"The inclusion of older people's housing will play a part in creating mixed and balanced communities. The Housing Learning and Improvement Network (Housing LIN) provides a good source of information on high quality and innovative housing solutions for an aging population. Guidance has been produced by HAPPI (Housing our Aging Population Panel for Innovation) that gives examples of how to design homes so that they better meet users' needs. It also shows how they can be positively integrated into places to encourage the benefits that interaction creates between occupiers of the dwellings and the wider community."</u>
6.2 Housing	BH8	Quintain	Object 10% requirement. When taken with other policies (particularly affordable housing requirements and re-provision of commercial floorspace), the impact is significant. It should be recognised that, due to viability, South Kilburn cannot deliver specialist older persons housing, and should therefore consider impacts of this nature on other schemes. The Local Plan Viability Assessment has not included the impact of this policy as it does not consider sites over 500 units, the threshold for which this policy should be considered. A clause should therefore be inserted stating 'unless it can be demonstrated that such provision would not be viable'.	There is flexibility on the specialist affordable housing which can be either a market product or an affordable housing product. South Kilburn is exempt from the policy due to the cost of re-providing socially rented properties and supporting existing leaseholders which will result in around 50% of the dwellings being affordable that require the highest levels of subsidy. This type of policy requirement is not applicable to non-Council estate regeneration. The viability assessment will be updated to take account of the 500 dwellings or more development scenario.	No Change.
6.2 housing	BH8	Stonebridge Real Estate Development	It is noted that to meet the DNLP target for specialised older persons housing, provision should come forward in defined circumstances. Current policy states it should be provided as 10% of units within Growth areas (excluding South Kilburn), or on sites with a capacity of 500+ dwellings. Policy BSSA7 should be modified to indicate that the provision of specialist older peoples housing is encouraged, subject to feasibility, but not mandated.	It is considered that a policy that encourages provision will be insufficiently robust enough to ensure delivery of the older people's housing, whilst the requirement for its inclusion will provide greater likelihood of this occurring.	No Change.
6.2 Housing	BH9	John Cox	Cannot ignore the evidence of gypsy and traveller needs. The plan should meet these needs. Policy BH9 should set a target to meet identified need of up to 90 additional pitches. Provision of accommodation for Gypsies and Travellers in Growth Areas should be mandatory. Provision should be as early as possible. This will allow early and stable links with the wider incoming communities, and to provide early school-settlement, job and training opportunities.	It is agreed that needs cannot be ignored, however there needs to be clarity on what the defined need is which should be evident once the Secretary of State has clarified his position on the Mayor's intention to adopt plan. The practical delivery/ management of the sites also needs to be considered to gauge the potential ability to address the need identified if this is towards the levels identified in the Mayor's preferred methodology. The Plan provides the potential for inclusion within Growth Areas as well as a development management policy to deal with new schemes.	No Change currently, but consider once there is a final decision on the acceptability of the Mayor's methodology by the Secretary of State.

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6.2 Housing	BH9	London Gypsies & Travellers	<p>The West London Gypsy and Traveller Accommodation Needs Assessment has found: 'A need for 83 pitches for households not meeting the planning definition. This consists of 23 concealed or doubled-up households or adults, 16 teenage children in need of their own pitch in the next 5 years, 2 moves from bricks and mortar, 4 from in-migration, and 41 from new household formation using a rate of 2.25% (derived from household demographics).'</p> <p>This evidences a strong need for Lynton Close and therefore the text should be amended as follows: 'The existing Lynton Close travellers' site will be retained unless evidence shows it is no longer needed.'</p> <p>The policy should set a target to meet the identified need of 90 pitches. the GTANA states that the need for households which do not meet the planning definition should be addressed by other means, such as via the SHMA or HEDNA and through other policies within the Plan, as is set out in the NPPF. Regardless of the definition used, there is a clear need which cannot be ignored. We welcome the approach that pitches should be provided as part of Growth Areas and that provision should be sought as early as possible with stakeholders, however, sites should be identified for provision.</p> <p>The criteria for assessing new proposals should be amended, removing from part b) the words 'without detriment to adjacent occupiers amenity'. This implies that Gypsy and Traveller employment affects other residents.</p> <p>Temporary accommodation needs for those who live in unsuitable locations or are travelling through the borough should be taken into account. The supported approach is set out in 'The potential for a negotiated stopping approach in London' report.</p> <p>We note that transit need is not identified in the GTANA, but does recommend those who commissioned the study to explore negotiated stopping as an alternative solution for short-term accommodation. The report recommends that meanwhile use locations for temporary stopping are identified in Local Plans, helping take a planned and managed approach to roadside camps, rather than resorting to evictions.</p>	<p>It is recognised that current evidence indicates that Lynton Close is required. Circumstances could however change if and when additional sites are provided and as such the inclusion of this part of the policy is considered appropriate.</p> <p>There is clearly a large difference in the results of need when considering the national and proposed London Plan definition. Once this has been clarified through the Secretary of State's consideration of the Mayor's Intention of Publish London Plan the Council can better plan to meet needs.</p> <p>The specific sites issue relates to the defined amount of need. The reference to 'without detriment to adjacent occupiers' amenity' is considered appropriate as there is a strong likelihood that as Growth Areas are predominantly residential led regeneration that these employment activities will be close to residential properties.</p>	No Change.
6.2 Housing	BH9	GLA	<p>Support recognition of new definition. Using this, Brent has a need for 90 additional pitches, equating to approximately 3ha of land. Requirement for new pitches should be included within suitable site allocations, taking a collaborative approach with neighbouring boroughs. Funding is available through the Homes for Londoners Affordable Homes Programme for new pitches. In addition, the requirement for consideration of sites over 1 hectare for to accommodate pitches is welcomed.</p>	<p>There is clearly a large difference in the results of need when considering the national and proposed London Plan definition. Once this has been clarified through the Secretary of State's consideration of the Mayor's Intention of Publish London Plan the Council can better plan to meet needs. The Council will consider the potential for funding from the Affordable Homes Programme at the very least for improvements/ additional capacity at the Lynton Road site.</p>	No Change currently, but consider once there is a final decision on the acceptability of the Mayor's methodology by the Secretary of State.
6.2 Housing	BH9	Quintain	<p>Object. When taken with other policies (particularly affordable housing requirements, re-provision of commercial floorspace, and older persons accommodation), the impact is significant. It should be recognised that, due to viability, South Kilburn cannot deliver specialist older persons housing, and should therefore consider impacts of this nature on other schemes. This requirement has not</p>	<p>Viability on this matter will be complicated and include a range of factors which will need to be factored in, such as size and how this is incorporated into a development, e.g. open site, or part of a building. The size of sites will need to be considered in association with the Gypsy and Traveller community, related to need to accommodate varying sizes of</p>	No Change.

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			been included within the Local Plan Viability Assessment. The size of sites required should be defined. What is meant by 'innovative ways of accommodating needs' should be explained. We also object as there is uncertainty regarding the definition of Gypsies and Travellers and therefore the overall need.	recognised communities, successful management and the opportunities that exist. The Council cannot be specific about the innovative ways, but in a high density environment it is likely that the site would have to be incorporated into a vertically stacked mixed use environment, e.g. the pitches could be accommodated in the ground floor of a development with other uses above. It is agreed that there needs to be certainty on the amount of need identified which will occur once the methodology is resolved.	
6.2 Housing	BH9	John Cox	The West London Gypsy and Traveller Accommodation Needs Assessment found a need for 86 additional pitches for households not meeting the planning definition. There is evidence of need arising from the Lynton Close site, so the second half of Policy BH9's first sentence is not justified and should be removed. The Needs Assessment also says that the need for households not meeting the planning definition will also need to be addressed through other means. The evidence should not be ignored and you should plan to meet these needs by setting a target for up to additional 90 pitches. It should be mandatory for accommodation for Gypsies and Travellers to be provided in Growth Areas and provision should be made as early as possible.	It is recognised that current evidence indicates that Lynton Close is required. Circumstances could however change if and when additional sites are provided and as such the inclusion of this part of the policy is considered appropriate. There is clearly a large difference in the results of need when considering the national and proposed London Plan definition. Once this has been clarified through the Secretary of State's consideration of the Mayor's Intention of Publish London Plan the Council can better plan to meet needs. The specific sites issue relates to the defined amount of need. The reference to 'without detriment to adjacent occupiers' amenity' is considered appropriate as there is a strong likelihood that as Growth Areas are predominantly residential led regeneration that these employment activities will be close to residential properties.	No Change currently, but consider once there is a final decision on the acceptability of the Mayor's methodology by the Secretary of State.
6.2 Housing	BH10	John Cox	Take account of the Consolidated Changes to the Draft New London Plan on estate regeneration, supported by the Panel. There should be a policy of no loss of social rented housing. Collect data long-term on what housing loss happens in the borough, and of what tenure, to inform future policy. Also encourage other council departments to monitor and document changes in levels of poverty and deprivation in redeveloped areas. Paragraph 6.2.89 should be rewritten so that it is understandable. Also, "conformity with" should be changed to "justification for" since that is the role of supporting evidence. Paragraph 6.2.88 remove underscore.	The London Plan Policy H8 is clear on how boroughs should deal with the redevelopment of existing social rent properties, which the Council supports. The Council has made it clear that addressing the affordable housing requirements of the population is one of its highest priorities. Where there are choices and funding available to delivery social rent properties, this will be a priority.	No Change.
6.2 Housing	BH13	Mercedes-Benz Retail Group	Within sustainable located, high-density developments, 20sqm of private amenity space per flat is inappropriate and undeliverable. It introduces significant daylight/sunlight considerations, plus design and engineering ramifications. The space amount should be a minimum level that can be widely accommodated by developments for each dwelling. Where seeking to create additional floorspace, it may be more realistic and deliverable to include a target for communal residential amenity space.	The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. In higher density developments, the amount and quality of amenity space becomes more, rather than less important. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other	No Change.

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				benefits attained in the scheme. As such it is not considered that the policy is unreasonable.	
6.2 Housing	BH13	DTZ Investors	Object. Significant quantum required is in excess of being realistically achievable on high density developments within Growth Areas. Should increase flexibility of policy so as to not undermine potential development.	The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other benefits attained in the scheme. As such it is not considered that the policy is unreasonable as currently worded.	No Change.
6.2 Housing	BH13	Quintain	Object as not justified or positively prepared. Standards should differ with the size of residential unit. Examples should be referred to where other amenity provision, such as proximity to open space and internal amenity (such as that provided within BtR) can contribute toward provision. Text should therefore be amended as follows: 'In some locations, such as town centres, in high density developments or developments with a high proportion of smaller units the council understands that meeting the overall minimum might be challenging or unnecessary. In these instances, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account other factors such as, mix of units, other areas of open space nearby and internal amenity spaces.'	The Council does not consider that it will be unnecessary for the developments to meet the standards, although as the policy justification identifies circumstances might make the achievement of the standard on site not possible. It is considered that additional wording to support justification of the provision of lower levels is appropriate.	Amend paragraph 6.2.100 to: "....meet residents' needs. <u>Where not meeting the standards, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account factors such as, accessibility of dwellings to their own amenity space and its quality, the amount and quality of communal space, proximity to other areas of open space nearby and internal amenity spaces.</u> The calculation...."
6.2 Housing	BH13	St. George	Object as: Not sufficiently flexible, not consistent with national policy. Proposed modification: "....(including ground floor flats) unless its inclusion would fundamentally undermine the development's delivery of other Local Plan policies." This significant quantum of amenity space is well in excess of what can realistically be achieved on high-density Growth Area developments. Its deliverability is questionable, therefore flexibility is required.	The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other benefits attained in the scheme. As such it is not considered that the policy is unreasonable as currently worded.	No Change.

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6.2 housing	BH13	Stonebridge Real Estate Development	<p>The policy is particularly onerous and prescriptive. Developments in built-up parts of London need to optimise valuable internal amenity space, whilst developments may also provide, or be best suited to the provision of, communal amenity space or the utilisation of public amenity space in the area.</p> <p>Paragraph 6.2.100 gives an indication of where flexibility will be applied if it is evident the policy cannot be achieved. The policy should be amended to reflect this paragraph:</p> <p>‘Where sufficient private amenity space cannot be achieved individually for each dwelling to meet the full requirement of the thresholds above, the remainder should be supplied in the form of communal amenity space. In some locations, such as town centres, in high density developments the council understands that meeting the overall minimum might be challenging. Whilst amenity space will assist in achieving the urban greening factor targets, other requirements such as renewable energy sources may compete for areas that might otherwise accommodate amenity areas, such as roofspace. The provision of amenity space will be considered flexibly where it can be shown that all reasonable options for provision have been considered and where it can be demonstrated that high quality communal space can be delivered to meet residents’ needs’.</p>	<p>The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other benefits attained in the scheme. As such it is not considered that the policy is unreasonable as currently worded.</p>	No Change.
6.2 housing	BH13	Wembley Towers Limited	<p>The policy is particularly onerous and prescriptive. Developments in built-up parts of London need to optimise valuable internal amenity space, whilst developments may also provide, or be best suited to the provision of, communal amenity space or the utilisation of public amenity space in the area. Paragraph 6.2.100 gives an indication of where flexibility will be applied if it is evident the policy cannot be achieved. The policy should be amended to reflect this paragraph:</p> <p>‘Where sufficient private amenity space cannot be achieved individually for each dwelling to meet the full requirement of the thresholds above, the remainder should be supplied in the form of communal amenity space. In some locations, such as town centres, in high density developments the council understands that meeting the overall minimum might be challenging. Whilst amenity space will assist in achieving the urban greening factor targets, other requirements such as renewable energy sources may compete for areas that might otherwise accommodate amenity areas, such as roofspace. The provision of amenity space will be considered flexibly where it can be shown that all reasonable options for provision have been considered and where it can be demonstrated that high quality communal space can be delivered to meet residents’ needs’.</p>	<p>The amenity space standards have been set based on Brent's experience of delivery to date, which has included many higher density developments. This requirement has also been factored into the viability assessments in past plans and the current plan. It should also be recognised that elements such as the London Plan Urban Greening Factor, plus policies to see ecological betterment, sustainable management of water, etc. all require space that can be incorporated into the amenity space provided. Where the applicant has shown that they have made best endeavours to meet the target but fall short, the Council has in the past shown some flexibility taking account of the quality of the space provided, plus also the other benefits attained in the scheme. As such it is not considered that the policy is unreasonable as currently worded.</p>	No Change.
6.2 Housing	Blank Housing	Sudbury Town Residents Association	<ul style="list-style-type: none"> • Brent’s design policies do not have regard to the STNP. Brent Policies BH2 and BH4 are contradictory. Brent Policy BH7 could lead to HMOs, without providing for families and Policy BH13 is not justified. 	<p>▲-The council does not agree that BH2 and BH4 are contradictory. The Growth Areas and Site Allocations have been identified as being sustainable areas for growth and provision of residential development. Meanwhile, town centre boundaries and intensification corridors (main movement / public transport corridors) have also been identified as more sustainable areas where the potential for meeting housing needs exists, as outlined in BH2. BH2 is therefore a positive policy which identifies areas suitable for potentially greater</p>	No Change.

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				residential development in sustainable locations. In line with this, Policy BH4 also seeks to ensure that planning permission for small sites is given when sites are located in more sustainable locations, ensuring that high levels of car dependency is not generated and thereby improving air quality. •BH7 does allow for the provision of HMOs where a need has been identified. In conjunction with this the council is proposing to introduce a borough-wide Article 4 direction to remove C3 to HMO permitted development rights. • The council does not agree that BH13 is not justified. Policy D6 (Housing quality and standards) of the new draft London Plan allows for local planning authorities to set higher local standards of private outside space. Brent proposes to maintain its existing outdoor residential amenity space standards, which are of a higher space standard than the new draft London Plan, but allow for an element of flexibility if space standards cannot be met.	
6.2 Housing	Blank Housing	Department for Education	Housing policies and supporting text should include the following: requirement for offsite contributions from all sites which do not provide a school onsite, where such capacity does not yet exist; free land transfer to the Council and construction costs to be met by the development where onsite provision is required, subject to viability; clear reference to required funding mechanisms (S106/ CIL), with cross reference to appropriate evidence base for justification.	The Council obtains contributions for education from s106 agreements. In addition, the council can also allocate strategic CIL towards education infrastructure. . Where masterplanning of Growth Areas shows the need for additional school sites, these will need to be accommodated within those areas, or alternatives will need to be put forward by the site owners to accommodate the school needs. Currently the Council is not able to specifically identify the additional educational requirements related to individual Growth Areas in addition to planned school expansion already set out to support the Schools Place Planning Strategy to 2023. When this is clarified it will be set out in the revised Infrastructure Delivery Plan, whilst masterplanning will identify site specifics that arise as identified in association with the Council's schools planning team. Currently it is not considered that any one growth area (apart from Wembley Church End, and Burnt Oak Colindale which already have a school site identified) will require an additional school to be provided. In addition all land in Brent is brownfield and thus has an existing (usually high) use value. A number of schools are also now provided as conversions of existing buildings and include a capital cost. As such it is unlikely that the site can reasonably be required to be provided from one developer (or even a consortium across a wider area) for free without adversely impacting on viability, particularly for affordable housing. The Plan's site allocation policies and paragraph 7.1.13 outlines what education infrastructure is required, particularly in the earlier stages of the plan period. As such this is not considered an appropriate request.	No Change.
6.2 Housing	Blank Housing	Thersa	Housing: Recognise constraints with regards to planning for projected population growth, however, the more homes built, the more that will need building. What is being done to discourage reproduction? Encourage people to have no more than 2 children through education.	Housing: Brent has a role in meeting the substantial housing needs generated from its own population and also from wider London and to be consistent with national planning policy has to do whatever it can to meet these needs. 2nd generation	No Change.

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			<p>This will have a significant impact upon the environment and peoples finances. Progress is slow so Brent should help build momentum. It would also address long term housing needs. Please reconsider they type of flats to get built as they are ugly and quick to become run down. Tall buildings reduce visibility of the sky, make us cramped and boxed-in, reducing quality of life, mental health and physical exercise. Also, ensure new/ existing homes have solar and are energy efficient.</p>	<p>families often have much lower fertility rates for a variety of reasons. Brent's design supplementary planning document has recently been updated which identifies the need to consider how well materials weather/ durability over the longer period. Tall buildings are a necessity to deliver at the densities and the number of dwellings required. They are being concentrated in certain areas of Brent to reduce their impact.</p>	

6.3 SOCIAL INFRASTRUCTURE

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6.3 Social Infrastructure	BS11	GLA	Support policy. Brent has not however conducted a social infrastructure needs assessment which is required by the DNLP policy S1. Essential needs such as for schools and healthcare should be established and their delivery secured in site allocations in accordance with DNLP policies S2 & S3.	Noted. The Council has undertaken numerous assessments which consider social infrastructure, where necessary with the support of relevant bodies, e.g. CCG, the Council schools planning, etc. This information has been collated within the Infrastructure Delivery Plan. Those areas within the borough which are subject to significant change, including Neasden Stations, Northwick Park, Staples Corner and numerous significant site allocations all require masterplanning. Draft London Plan policy S1, criterion B notes that in areas of significant development and regeneration, social infrastructure needs should be addressed via area based planning, including through a masterplan approach. This approach will ensure that areas which will be subject to significant population increase will include the necessary social infrastructure. This method will be supported within the Infrastructure Delivery Plan which is seen as a live document, and will be updated as and when new infrastructure requirements are identified. Where known the site allocations specifically state whether a new school (primary & sec) and school expansion programme are required. This also goes for health facilities. Also the delivery chapter mentions these requirements based on the evidence set out in the IDP	No Change.
6.3 Social Infrastructure	BS11	Department for Education	Policy requires new social infrastructure is located in 'flexible and adaptable buildings' and co-located with other uses. Whilst this may be appropriate in some instances, there will be educational facilities for which this won't be appropriate. This could be due to SEN requirements or safeguarding issues for instance. Therefore the words 'where possible and appropriate' should be added to points g) and h).	The needs of occupiers will be taken into account and this will clearly influence the extent to which buildings can meet criteria g) and h). For a school meeting SEN it makes sense for it to as much as possible be flexible to be re-purposed for general educational needs with as little structural change as possible. Criterion h) uses the wording 'ideally' therefore adding sufficient flexibility.	No Change.

6.3 Social Infrastructure	BSI1	Sports England	Sport England welcomes the policy reference to community use agreement and to considering re-using or redeveloping sites for sports and leisure facilities where the existing use is deemed no longer required by the community. Sport England are concerned with the stance of Policy BSI1 and recommends that the current approach to social infrastructure is reconsidered, where individual policies are pursued. Sports facilities and playing fields should only be lost if there is identified surplus of provision (which is not the situation in Brent) in robust and up-to-date strategies or the facility is being replaced with at least equivalent quality, quantity and accessibility. As stated in the NPPF, para 97 and Sports England Planning policies. This is referred to within the document in para 6.6.15 under Green Infrastructure. Policy BSI1 does not take into consideration growth and future users nor considers the requirement for 'spare capacity' which is necessary to counter unforeseen circumstances, such as playing field being unavailable for a season. One overarching policy of social infrastructure does not take into consideration of each provision and does not guard against the loss of one form of social infrastructure to another. To ensure effective planning for sport and recreation, Sport England recommends a specific policy for indoor/built sport provision and another for outdoor/playing field provision that takes into consideration the findings and recommendations of the Playing Pitch Strategy and Indoor Sports and Leisure Needs Assessment and is in accordance Sport England's Planning Policy and the NPPF.	Noted. The policy as currently worded states that facilities will be retained unless they are demonstrably no longer required and that no other use is required on site, it would not result in a shortfall of that use, a better facility is provided. Given that facilities are already in shortfall within the borough, it would be difficult for a developer to argue the case against this policy. It is therefore seen as sufficient in its current form. Policy BSI1 does not address totally new social infrastructure for population growth. This is addressed within individual site allocations as necessary. The policy guards against the loss of one form of social infrastructure to another by requiring applicants to demonstrate that the existing facility is not required in its current use and that its loss would not result in a shortfall in provision. This helps distribute required social infrastructure effectively within the borough, especially considering limited space for such infrastructure, and its competition with other uses. Requirement for sports infrastructure is laid out within individual policies where necessary, including Place policies, Growth Area policies, and Site Allocations. This is seen as sufficient given the requirement to update the Plan every 5 years. Requirements for social infrastructure are laid out within the Infrastructure Delivery Plan, which serves as an evidence base document for the Local Plan.	No Change.
6.3 Social Infrastructure	Blank Social Infrastructure	Thersa	Education: Closely CNWL in Willesden will be a mistake. Reducing access to local education will reduce residents employability. Reducing to one site will result in job loss and means there will be no post-16 education provision around Willesden. 7.1.14 states teaching facilities will be improved, but what about the huge investment into the Telford Building at CNWL Willesden 8 years ago? Or redevelopment at Willesden 2 years ago? More public money wasted. How can this be justified if only to last a short time? Do not wish to see this site redeveloped into flats. How long before the Wembley site closes? There was once 3 CNWL sites. There was huge investment around 10 years ago on the Kilburn site which only lasted a few years before closure.	Education: The decision to consolidate on one campus is that of the CNWL not the Council, nevertheless the Council is supportive if this allows the college to provide high quality education to meet the local population's needs. The majority of public institutions have been subject to significant reductions in budget since 2008 so needs to continually assess how it uses its assets and increase their efficiency, hence the need for consolidation despite previous significant investment in capital.	No Change.
6.3 Social Infrastructure	Blank Social Infrastructure	Department for Education	DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. Please see the Developer Loans for Schools prospectus for more information. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.	The provision of and access to this funding is welcome, but in the short to medium term is unlikely to be required by the Council.	No Change.
6.3 Social Infrastructure	Blank Social Infrastructure	Department for Education	The Plan should be effective. In this context, it should be ensured that contributions for education by developers be sufficient to meet needs. This requirement has not been explicitly stated by policy within the Plan. the closest reference is by 4.44 which states that development will be expected to provide associated infrastructure. It may be appropriate to include a policy making clear that sites will be expected to contribute proportionately in line with PPG and DfE Contributions Guidance.	Noted. The current wording is seen as sufficient so as to require the appropriate funding for infrastructure from developments. All financial contributions captured from developments comes as Community Infrastructure Levy (CIL) payments. These are strictly for infrastructure to support development and is a standard requirement, being paid without negotiation. Funding will be allocated to projects as prioritised within the Infrastructure Delivery Plan.	No Change.

6.3 Social Infrastructure	Blank Social Infrastructure	Department for Education	Authorities have experienced difficulties in funding schools via S106 due to constraints on pooling, however, this has since been revised with scope for unlimited pooling. The advantage of securing S106 over CIL is that it is clear and transparent to all what the funds will be allocated toward, helping increase certainty that contributions will be used to fund provision of required school places. DfE supports this approach in line with CIL Reg 122.	Noted. The Council uses CIL to collect funding directly related to the impacts of development on infrastructure, this includes for educational purposes. As such it is not envisaged that S106 will be used in this manner, although it may be used to secure sites.	No Change.
6.3 Social Infrastructure	Blank Social Infrastructure	Department for Education	Support general approach to securing schools, however, we request clarification that developer contributions may be secured retrospectively when it is necessary to forward fund infrastructure in advance of anticipated growth. This would help ensure the Plan is positively prepared and deliverable.	Noted. The Council uses CIL to collect funding directly related to the impacts of development on infrastructure, this includes for educational purposes. As such it is not envisaged that S106 will be used in this manner.	No Change.

6.4 ECONOMY AND TOWN CENTRES

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE1	GLA	<p>Support. There is a difference between suitable business space (policy E2) and affordable workspace (policy E3). Suitable business space can include lower cost business space and should be provided as part of schemes which exceed 2,500m² or a lower locally evidenced threshold in accordance with draft new London Plan Policy E2.</p> <p>Affordable Workspace, refers to workspace for a specific social, cultural or economic purpose which should only be sought within specific locations or and secured through S106 agreements.</p> <p>An approach should be adopted which sets out what type of workspaces and suitable business spaces are required and where based on up to date evidence.</p> <p>To avoid confusion with policy E3, a different term to 'affordable workspace' should be used as the two meanings currently conflict.</p>	<p>Noted. It is seen that the function of this policy meets the definition of Affordable Workspace as set out within draft London Plan policy E3. Supporting paragraph 6.4.12 notes that the workspace should be provided for start-up companies or in the form of 'move-on' space for SME's, prioritising B1(c) to meet needs. This meets a specific social, cultural, or economic development purpose as identified within London Plan policy. These needs were identified in the Brent Employment Land Demand Study. Due to our 'Provide Capacity' status, we have prioritised the delivery of floorspace within the B use classes, with the exception of B1(a). This is identified in policies BE1, BE2, & BE3. BE1 & BE3 specify B1(c) as priority. Policy BE2 identifies in which locations this should take place. The development of designated employment sites through co-location requires a masterplan approach. The GLA will be partner in this process. This will allow the Council to identify an appropriate distribution of uses within each allocation. Other sites will come forward for intensification as governed by the market, and in broad alignment with the West London Employment Land Review.</p>	No Change.
6.4 Economy and Town Centres	BE1	Alun Evans	<p>Current policy wording is irrespective of proposed use class which could have detrimental impacts upon viability of major developments, especially in growth areas and sites where business space has not been proposed as part of the development. It is queried whether the policy is intended to relate to major developments of over 3,000sqm B use class floorspace, rather than any major development over 3,000 in total. This is not consistent with NPPF as 10% of 'total' floorspace within major developments will prejudice the delivery of housing and other key land uses.</p>	<p>To date the affordability testing for the Local Plan confirmed that it applied 10% of affordable workspace to schemes where 3000 sqm. of industrial/office uses were being proposed. The policy was however written to apply to all developments irrespective of the principal use being industrial or not and this was not identified by the organisation undertaking the viability assessment. To support the current policy wording additional viability assessment work will be required. This will clarify if the current policy wording can be justified. Once clarified, the policy can either be retained, or amended for example to refer to industrial/office developments of over 3000 sqm. as identified in the viability assessment.</p>	No Change currently subject to viability testing.
6.4 Economy and Town Centres	BE1	Quintain	<p>Object as not effective. The policy requires the education quarter at Wembley to be protected and enhanced however from the officer's response it is clear that the education quarter has not been identified and will be decided by the final location of the new CNWL campus. The policy should therefore state that the Council will work with the CNWL and land owners at Wembley to deliver an educational quarter during the Plan period.</p>	<p>It had been assumed that clarity would have been provided on a definitive site for the College of North-West London at Wembley by now which would allow the identification of a 'quarter'. As such the policy will be widened in scope to support provision where it is necessary and protection of the subsequent site.</p>	Policy BE1 amend: " <u>....Further and higher educational provision quarters</u> at Northwick Park and Wembley will be protected and enhanced.
6.4 Economy and Town Centres	BE1	Thersa	<p>Plans to scale down the College of North West London should be opposed. The Willesden site has a long history which has systematically been downgraded through reduction in courses. Any further consolidation will reduce the offer to local employers and skills of the local population, affecting economic outputs and the ability of the local population to find work.</p>	<p>The CNWL provides courses which have to be attractive in content and in the environment in which they are taught to students. It is in a competitive market and like all further education establishments is required to reduce costs/maximise the efficiency of its estate, which the consolidation onto one site will do.</p>	No Change.

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6.4 Economy and Town Centres	BE1 - BE9	TfL Commercial Development	2. Wembley SIL has changed under policy BE2 and no longer states 'intensification as above, with the exception of site allocations', but is now solely for employment uses. This is not appropriate and should be reversed so that site allocations are exempt from solely employment use intensification.	2. The Council amended the policy on the basis of representations received from the GLA taking account of the emerging London Plan and the borough's status as a provide capacity borough. The GLA's interpretation of London Plan policy E7 for allocated sites appears to be that it does not apply retrospectively but only to those sites allocated as part of subsequent Local Plans, taking account of how a council can evidence it can release the site in accordance with E4 and E7.	No Change.
6.4 Economy and Town Centres	BE1- BE2	GLA	The Mayor maintains that the draft Local Plan is not in conformity with the London Plan. It does not respond positively to being a 'provide capacity' borough as set out in Table 6.2 of the draft new London Plan. It also intends to diverge from draft new London Plan Policy E7 through promoting co-location of non-industrial uses within Strategic Industrial Land (SIL) at Staples Corner and Northfields (East of Grand Union Canal). The West London Employment Land Review methodology is also a matter of non-conformity and contention as it challenges a fundamental element of the new London Plan evidence base.	Policy BE2 seeks to intensify both SIL and LSIS land for industrial uses. The Council's Local Plan Viability Assessment has identified that some SIL/LSIS sites will not be viable to intensify for solely industrial uses, and will need to be co-located with residential to increase viability and improve likelihood of intensification. These sites will require a masterplan approach, as is stated within the London Plan. The GLA will have input on this. Brent has limited brownfield land which is appropriate/ available for development. Many of those sites which are available are located within SIL/LSIS. The approach taken here is seen as appropriate given the significant industrial and housing targets set by the London Plan. The approach will provide both industrial intensification and residential development to come forward simultaneously, increasing the Plan's effectiveness in ensuring delivery. The Northfields development was granted planning permission prior to the adoption of the new London Plan which has taken a different, and significantly stronger stance on the loss of industrial land. In order to ensure the Plan aligns with current extant permissions, the Northfields SIL has been included as a separate category which will see that delivery of industrial/ employment land comes forward as outlined within application 18/0321 (as amended) as a minimum. The remainder of the SIL will be intensified consistent with the London Plan. Notwithstanding the GLA's position, the Council has consistently put forward the case the intensification on its own is unlikely to deliver the scale of floorspace/ equivalent land provision identified in the London Plan's evidence base. The Panel had evidently had significant concerns about the London Plan's ability to deliver to meet industrial land needs. The Mayor was recommended to consider a number of actions, including identifying more boroughs as 'provide capacity' and identifying future greenbelt review. Neither of these the Mayor has accepted. As such whilst the Council will work to intensify as much as possible, it is doing it within the reasonable parameters available to it to ensure delivery. For some SIL sites, particularly those where there a substantial transport infrastructure possibilities, the Council asks the GLA to take a more considered view to the potential of these sites in the round to meet a variety of London's needs	Policy BE3 amend: " <u>The Council will require the retention of and where possible the intensification of Local Employment Sites in industrial use.</u> The council will allow the release of Local Employment Sites to non-employment uses where:a) continued wholly employment use is unviable; orb) development increases the amount of <u>workspace as well as retaining the existing employment use or providing that additional workspace as affordable workspace in the B use class, with makerspace in use class B1(c) prioritised to meet demand. Where criterion a) is being used to justify the release, the maximum viable replacement of the existing employment floorspace will be sought.</u> Paragraph 6.4.21 amend: "...closely related sui generis uses. <u>They can be sites wholly in employment use, or part of the floorspace or yardspace of a mixed use building or site.</u> They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy in recognition of the borough's provide capacity status seeks to support the retention and intensification of Local Employment Sites in industrial use for continued industrial use, consistent with policy E7 of the

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				than those focussed purely on employment industrial. On Local Employment Sites, it is accepted that more could be done within the policy to promote the potential for intensification as a starting point, with mixed use promoted where this, or purely employment uses are not viable.	<u>London Plan</u> . The policy...."Paragraph 6.4.22 amend"with short term flexible leases appropriate for SMEs. <u>Where the Council accepts that a site is unviable for its retention for wholly employment purposes, it will seek the re-provision of maximum amount of employment space (with industrial were industrial was the existing use) that is viable in any development proposal.</u> "
6.4 Economy and Town Centres	BE1- BE3	GLA	The Brent Employment Land Demand Study 2015 states a need for between 33,600m2 and 52,350m2 of B1a until 2029, whereas the London Office Policy Review 2017 projects a demand of 44,000m2 until 2041. In the absence of more up to date evidence, this relatively low projection means that Brent should set out an overarching policy to support the provision/ protection of B1a in town centres and other sustainable locations. It is not clear how sites have been identified for office development, and there is no policy to control how much and where it will be delivered. The DNLP identifies Brent, Kilburn, and Wembley Park town centres as having some potential for office development which needs to be reflected in the Local Plan. If Brent wishes to provide significantly more office space than established need, then a strategy should be in place to create the right economic conditions. Brent lost 180,000m2 of office space between 2013 and 2016, primarily due to PD rights. An Article 4 Direction has been submitted to limit losses to PD rights which the Mayor supports. Reprovision should be managed by policy. Table 2.1 of the DNLP sets out that the Wembley Opportunity Area should deliver 13,500 new jobs until 2041. The Local Plan should set out how it intends to meet this capacity through policy which releases office development from SIL and LSIS and focuses it within Wembley and other town centres.	Brent's Local Plan Viability Assessment indicates that pure office development is unviable, notwithstanding the needs identified. Market intelligence indicates that office is unlikely to be built in all but on a small scale to the south of the borough where rents are higher and recent trends point to exactly the opposite, the space is more valuable for other uses, particularly residential which has been taken up through permitted development to residential. Whilst some space has been completed by Quintain as part of its place-making for Wembley Park and to relocate an existing land owner to release a site for development, the remaining speculative element has remained largely unlet despite being marketed for at least 2 years. Brent has lost much office by prior approval. It has sought to restrict this loss by introducing Article 4 directions across the borough. Proposed loss of office will now be considered against Brent's local employment sites policy BE3. It is interesting to note that the Mayor expects Wembley to accommodate additional office, as well as all the other requirements of the London Plan in this area, such as a significant uplift in residential, hotels, night time economy uses and student accommodation, whilst seeking to ensure protection of SIL. The SHLAA undertaken by the GLA did not make any discounts for on residential capacity assumed on sites related to these additional needs. The GLA needs to consider the impacts of individual London Plan policy elements in the round, prioritising those of most importance and accepting that some of the less deliverable are more aspiration than minimum requirements. Whilst current plan policies would allow for new office in town centres, market appetite in the short to medium term appears weak. If it were to come forward on a significant basis, it would likely displace/ disrupt assumed residential capacity accounted for in this Local Plan.	No Change.

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6.4 Economy and Town Centres	BE2	TFL Commercial Development	Broad support for approach to intensification of industrial land, including co-location with residential. However, the approach could be clearer in its aims to intensify industrial land within SIL and LSIS to enable the release of sustainable sites for residential. Although dealt with in the Employment chapter, further clarity would be beneficial within this chapter, including the following wording within paragraph 4.37 a): “The London Plan is clear that industrial land should be managed through the Local Plan process. As a ‘provide capacity’ borough, Brent will establish a clear and structured approach to deliver industrial intensification and land release, where appropriate”.	Recognition of Brent as a 'provide capacity' borough in the London Plan is considered appropriate in relation to the Growing a Good Economy section as this does differentiate it from many other London Boroughs.	Amend Growing the Economy objective a) to: “As a 'provide capacity' borough in the London Plan, make better use of Brent's employment industrial land through a structured approach to deliver industrial its intensification and land release, where appropriate and also where possible support additional housing/ community facilities through co-location”.
6.4 Economy and Town Centres	BE2	Ikea	There is no recognition that IKEA is an established retail (A1) and office location in the Plan. This is unlikely to change during the plan period. It has potential for intensification and a mix of uses alongside IKEA’s operations. The Council’s SIL site assessments recognises this. Furthermore, GLA have recognised its importance to be considered alongside the adjoining Tesco site as part of a comprehensive masterplan, achieving industrial land intensification elsewhere within the Wembley SIL, and allowing these non-industrial sites to be redeveloped for non-industrial uses. Accordingly, the site should benefit from a bespoke allocation that recognises these elements, whilst also being permissive of its potential mixed-use development intensification in the future. Uses could include, but not be limited to, housing and other commercial uses within the B Use Class. Section 4 of the Draft Plan outlines strategic objectives that the site can deliver. Draft Policy BE2 allows for co-location of residential uses in certain SILs, albeit this does not extend to include the Site at present. Brent Employment Site Analysis, November 2018, deemed the SIL as a whole as not appropriate for residential use currently due to its PTAL rating (much of which is lower/worse than the Site itself), and the presence of uses that could affect residential use through noise, odour and air quality. There is a clear recognition within the Council’s evidence, however, that the Site and adjoining Tesco areas have the potential for development intensification in the future. The ‘West London Employment Land Study’ (July 2019), also recognises the Wembley SIL as a potential area for co-location (Table 79). For the following reasons the Site is appropriate for, and could be allocated for a range of possible residential and commercial uses, alongside the existing IKEA: <ul style="list-style-type: none"> It is already an established retail (A1) and office destination; It is immediately adjacent to existing residential communities, to its south and west; It is located in an accessible and sustainable location, with strong public transport links; A mix of uses could promote a more effective use of the Site, meeting the need for homes and other commercial uses (NPPF Para. 117); It is a brownfield location, thus encouraged for redevelopment; Intensification of the Site would contribute towards the Plan’s strategic objectives, specifically creating strong and inclusive communities, making the best use of land, whilst potentially delivering the homes to meet Brent’s needs; NPPF (Para. 122-123) requires efficient use of land including, where appropriate, building at higher densities; NPPF requires optimising sites 	Noted. Brent has been identified as a 'Provide Capacity' Borough in the new London Plan. This sets a significant industrial floorspace target. In order to meet this target, and to comply with London Plan policy E7, designated industrial sites such as this will need to be intensified for industrial uses. The site has long been designated as SIL due to its history of industrial uses, and proximity to the strategic road network. The site makes up part of Wembley SIL which is designated under policy BE2 for intensification of industrial uses only. It will not be possible for the Council to meet its London Plan industrial floorspace targets if areas of existing designated industrial land are reduced so as to allow for the development of other uses. SIL in particular is strategic in serving the wider London area, and requires significant areas in order to function effectively. They also include uses which would not be appropriate to co-locate alongside residential, and would represent bad neighbours. The West London Employment Land Review includes Wembley in table 79 as an area for potential co-location. The document states that this is in relation to the western most portion of SIL, given its proximity to the Wembley Area masterplan, and associated amenities and PTAL. The Eastern portion is not supported, due to low PTAL, proximity to 'bad neighbours', lack of amenity potential, proximity to the strategic road network, and impact of other uses on existing SIL function. This document also foresees a requirement of 13ha of industrial land required, whereas the new London Plan stipulates that Brent is to provide a further 43ha through intensification. This therefore does not support the release of SIL for other uses.	No Change.

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			<p>to accommodate and sustain an appropriate amount, and mix, of development; and· NPPF requires promotion of social interaction, which can be achieved by a mix of uses in a single location.London Plan Policy E7 allows for consolidation of parts of SIL to facilitate the release of some land for a mix of uses including residential. As a minimum, this approach must ensure “no overall net loss” in industrial floorspace capacity. The Site is not currently in industrial use, and there would clearly be no net loss in industrial floorspace capacity arising from an intensification of development.</p>		
6.4 Economy and Town Centres	BE2	GLA	<p>1 WLELR: The approach to industrial land within the plan conflicts with the London plan as the supporting evidence (West London Employment Land Review - WLELR) uses different methodology compared with that used to guide London Plan policy (Industrial Land Demand Study 2017). This identified Brent as a ‘retain capacity’ borough instead of ‘provide capacity’. The study is flawed as it uses labour demand modelling to forecast land demand for warehousing. This is not appropriate in London, or nationally (PPG para 031 Reference ID: 2a-031-20190722). Warehousing demand is more closely correlated with growth in the economy and population rather than employment numbers. Therefore land demand for these uses has been significantly under estimated. This is also true for transport. The WLELR also lacks demand assessment for waste and utilities which also occupy industrial sites. It is also limited to a part of Park Royal. Heathrow property market. A broader assessment will have yielded better results. It identifies very low vacancy rates and some of the highest industrial rents in London, yet despite this, identifies little capacity although there is only one years identified supply.The Mayor strongly encourages, and considers it essential, for a new review to be undertaken which aligns with the methodology used by the London Plan and the PPG. The panel supports this methodology and suggested that it</p>	<p>The Council accepts its status as a 'provide capacity' borough. In terms of the methodology of the West London Employment Land Review, it will not pursue the approach of merely seeking to provide the lower hectares that this study showed would be required. The study provides a useful alternative in terms of sense-checking the London Plan work. The Council through its work on the Local Plan has sought to maximise the potential of its industrial areas through the approach to co-location on its LSIS sites, in recognition that for many areas in Brent, pure industrial development has been unviable and the Council's current viability studies indicate that on many sites this will remain the same. As such the Council has sought to incentivise sites through co-location. Current pre-application work/planning applications received recently indicate that this is working in areas where there is strong demand for residential too, such as Alperton where sites are delivering significant uplifts in residential, but also as a minimum achieving replacement existing floorspace or 0.65 plot ratio for industrial. Where intensification could work without other 'enabling'</p>	No Change.

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			has likely underestimated demand and that the LP should take a firmer stance on the protection and provision of industrial land.	development, the Council has retained the 'intensification' designation for LSIS. It will essentially be for the industrial market to react to these opportunities. Evidence supporting the Brent Local Plan on viability, indicates delivery could be constrained by lack of financial viability and developer appetite for untested products, such as multi-storey developments. Time will tell if constrained demand and increased investor confidence following delivery elsewhere will increase supply in these areas. The Council will use the GLA's findings in relation to land for potential waste and utilities infrastructure needs.	
6.4 Economy and Town Centres	BE2	GLA	<p>2Industrial Land Audit. Mayor supports in principle, however it does not follow the guidance set out in the Mayor's practice note on industrial intensification through plan-led and masterplan approaches. The audit should include information on: a site by site basis, existing plot ratios, occupancy and vacancy rates and land ownership among others. This will guide how intensification can take place and how sites with low vacancy rates may be improved. While a masterplan approach is suitable for individual sites, a provide capacity borough could only feasibly do this within a wider borough-wide strategic framework to ensure the borough wide targets are met. This should involve the identification of site floorspace capacity, and timescales for delivery. Monitoring will be key to ensure targets are met. Within policy BE2 both Staples Corner and Northfields SIL sites are identified as suitable for co-location which is not in conformity with LP policy E7. SIL may be released for non-industrial uses only where the remaining SIL has been intensified to offset losses, resulting in a minimum of no net loss. However, in Brent's case, addition capacity (most likely B8) would need to be delivered before SIL can be released for co-location. Given 43ha is required, SIL and LSIS should be intensified first, followed by non-designated industrial sites and other land including redundant retail parks. Northfields has resulted in the release of 9.16ha of industrial land designated SIL, and it is not clear how much of this will be reprovided on site. Permission for this was given after publication of the draft new London Plan in December 2017, and as such the London ILDS 2017 does not take into account this loss. Depending on the extent of reprovion Brent may need to secure further industrial capacity to make up for this loss and meet LP targets. Demand for warehousing and logistics space is driven by changes in consumer behaviour through new business formats brought forward by advances in technology which needs to be considered. The Mayor supports the recent Article 4 Direction to remove Permitted Development rights for conversion of light industrial to residential.</p>	<p>2. The Council will do more work on this study to help inform suggested ways in which existing SIL and LSIS sites can be intensified. Having said that it is not clear how undertaking such detailed specific analysis of individual sites will assist to any significant degree in increasing the prospects of delivery. To understand this, there will need to be extensive consultation with landowners/ occupiers to gain an understanding of appetite to intensify. This will take some time and will be very resource intensive to be done to a level that provides useful outputs. It can be taken forward in the context of the SIL and LSIS site policies that in the meantime will protect industrial land from other uses and allow intensification to occur where there is a willing landowner/ developer. Where there is potential for delivery the Council can work together with landowners/ occupiers to take forward masterplanning to provide a positive framework for investment. The Brent Industrial Land Audit identifies the theoretical capacity to provide the equivalent of 49 hectares on designated SIL and LSIS (excluding parts of Park Royal in OPDC). The London Plan provides a clear and positive policy framework to intensify; the principal issue is not whether there is a theoretical capacity to intensify, but whether the market is likely to deliver. Brent's local evidence and also evidence/ discussion at the London Plan Examination in Public round tables indicated concerns with GLA's assumptions for delivery of the 0.65 plot ratio for storage and distribution and also the appetite from historically conservative industrial space investors to deliver new products. The West London study indicates that investment in new stock as a proportion of existing over the last 30 years has been very small (about 14%). This historic trend of a low-level of renewal and now low vacancy rates indicate that realistically prospects of intensification of existing sites to meet assumed GLA targets are low, unless provision of space becomes so lucrative that it results in a sea change of delivery. Taking account of concerns with likelihood to meet needs, the panel made recommendations for the Mayor to consider identifying more 'provide capacity' boroughs and identifying the potential need to</p>	No Change.

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				<p>review the green belt in the next London Plan. Both of these options the Mayor rejected. As such whilst the Council accepts its status in the London Plan and will endeavour to encourage intensification, the GLA should also be realistic of the extent to which the policy framework whilst being supportive of intensification, can actually ensure the delivery of the quantum of additional space it has identified are necessary. In relation to co-location in SIL, the point is taken. The Council has concerns about how this will affect likely delivery of additional industrial floorspace, as many industrial premises are small and thus the model of intensification to release land on a site will in practice require many different site owners to work together, making delivery much more complicated. In relation to Staples Corner it asks the GLA to look at this area in the round and the opportunity it has in relation to a number of potential positive outcomes by incorporating co-location in parts, particularly on the periphery of the area, rather than a pure focus on intensification to allow release to other uses. Delivery of additional industrial floorspace will be much more likely where supported by cross-subsidisation through vertical co-location which will allow smaller sites to be delivered. On Northfields, approximately 6 hectares has been lost, when taking account of the re-provision of industrial space on site in a multi-storey development. This in theory will need adding to the GLA's 43 hectares target. The Council is liaising with the OPDC to identify the extent to which the portion of Park Royal that lies within the borough can contribute to achieving the GLA target. Due to the significant changes likely in the emerging OPDC Local Plan related to the retention of Car Giant as SIL, specific details of potential will be some months away as new masterplanning work is required to identify how London Plan housing targets can be achieved.</p>	
6.4 Economy and Town Centres	BE2	GLA	<p>The Mayor expects existing uses within site allocations to provide the baseline data which underpins a borough-wide plan-led approach for intensification due to Brent's provide capacity borough status. Industrial Land Audit findings should directly feed into site allocations, stating which sites, which uses, and how much will be provided.</p>	<p>Noted. Intensification of industrial land will be managed primarily through policy BE2, using the draft London Plan approach of increasing the plot ratio to 0.65 or existing, whichever is greater. Opportunities to increase floorspace above this will take into account the likely potential for delivery, taking into account viability and wider aspirations related to place-making. Designated industrial sites which have been identified for co-location, as listed in policy BE2, will be subject to a masterplan approach. The masterplan will use the guidance outlined within Brent's Industrial Land Audit. This approach essentially allows the Council to manage the intensification of industrial land using the borough-wide assessment of the Industrial Land Audit, deferring any prescriptions to the masterplan stage.</p>	No Change.

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6.4 Economy and Town Centres	BE2	Amafhh Investment Limited	a) The policy incorrectly uses the term ‘employment floorspace’ instead of ‘industrial’ which the London Plan specifies in Part A of Policy E4. ‘Employment floorspace’ (within draft Policy BEGA2) creates confusion in the policy framework. References to ‘employment’ should be changed to ‘industrial’.	Noted. A) It is accepted that although employment in the policy is clear in identifying industrial uses, the difference in terminology with the London Plan might cause some confusion. On reflection it is considered that this should be changed to industrial.	Policy BE2 amend: "Within SIL and LSIS development will be supported where it intensifies employment industrial uses and accords with the principles as follows....."Policy BE2 amend: "..These sites will be protected for solely <u>industrial uses as defined in London Plan policy E4 Land for industry, logistics and services to support London’s economic function Criterion A</u> ". employment uses within use class B1c, B2, B8 and closely related sui generis uses. Development will be supported which increases the amount of <u>employment industrial</u> floorspace in these use classes, including start-up space, move on space. Any loss or reduction in floorspace will beresisted...."Amend Policy BE2 ".....A net increase in <u>employment industrial</u> floorspace; a mix of B1(b), B1(c), B2 and B8 employment floorspace will be...."Amend Policy BE2 "..and affordability of <u>employment industrial</u> floorspace consistent with planning permission18/0321....."Paragraph 6.4.18 amend: "... The West London Employment Land Review (WLELR) identified demand for an additional 0.6ha of industrial floorspace, primarily to meet projected demand for logistics. In addition to this, a number of sites within designated industrial sites are protected for waste purposes as identified in the West London Waste Plan and the policies map. The London Plan sets a higher waste target for Brent than previously which may mean additional sites for waste purposes will be required. Consistent with its 'provide capacity' status Brent the Council is committed to exceeding this

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					<p><u>figure deliver an increase in industrial floorspace to support growth in business and employment.</u> Paragraph 6.4.18 amend: "...intensification of Park Royal which is being led by the OPDC. <u>The extent to which intensification and co-location will lead to an increase in industrial floorspace at this time is not known. Initial preliminary masterplan options work on Staples Corner in association with the GLA has shown addressing landownership and viability issues to incentivise and deliver additional floorspace is a complicated process.</u> Nevertheless, the Council will undertake best endeavours to provide additional capacity, with a backstop position of not dropping below the 0.65 plot ratio within each defined industrial location." Paragraph 6.4.19 amend: "The <u>West London Employment Land Review (WNELR)</u> identifies that whilst....." Paragraph 6.4.20 amend "In calculating what constitutes the minimum floorspace requirement required in any site's redevelopment, the existing <u>employment industrial or warehousing floorspace</u> or a plot ratio of 0.65 will be applied, whichever is the higher....."</p>
6.4 Economy and Town Centres	BE2	Amafhh Investment Limited	b) The policy incorrectly refers to the requirement for "a net increase in employment floorspace". This goes beyond draft London Plan the requirements and should be replaced with "no loss of industrial floorspace".	b) Draft London Plan policy E7, part E notes that development plans should ensure that industrial land on SIL and LSIS are intensified to deliver an increase in industrial floorspace (or at least no net loss). The LB Brent has been identified within the new London Plan as a 'Provide Capacity' borough and has been set a significant target for industrial floorspace. Given this, it is seen as appropriate to intensify industrial land to incur a net increase in industrial floorspace.	No Change.

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6.4 Economy and Town Centres	BE2	Amafhh Investment Limited	c) An opportunity to identify other suitable uses in the Staples Corner SIL (as part of its mixed-use transformation) is missing. It should be expanded to include religious and community uses, hotel and conference centre.	c) The current allocated use includes 'co-location'. This is seen as flexible enough so as to allow for a multitude of uses. Policy BP2, criteria K & L state the need to provide sufficient social infrastructure in this area, and to retain the religious venues. The finer detailing of appropriate uses within the Staples Corner Growth Area site will be determined through a masterplan approach when it is clear how much land will become available for other uses and the extent to which supporting infrastructure is required to support these uses.	No Change.
6.4 Economy and Town Centres	BE2	OPDC	Reference to the West London Waste Plan (WLWP) required.	Agreed. This should be added to policy BE2 policy justification.	See change proposed in relation to response to Amafhh Investment Limited, added for clarity's sake.
6.4 Economy and Town Centres	BE2	St. George	Object. The Northfields development site area should be de-designated from SIL. 18/0321 was determined under DMP14 which, in addition to the Brent Employment Land Demand Study 2015, provided the framework for releasing SIL at this site. Despite this the site is still allocated as SIL. The requirement for a specified quantum of floorspace is outlined within site allocation BSWA7 which reflects 18/0321. London Plan policy E5 and E7 confirms the scope for consolidation of SIL which should be done through a plan-led approach. The policies which affect the site should reflect the scale of development granted, and be flexible so as to allow for change. NPPG on supporting more effective use of land also notes the requirement to consider planning applications in land use allocations. In addition, annotate the proposal map SILs to reflect the BE2 schedule for clarity.	The Council sought to retain the designation to ensure that industrial floorspace was provided as part of the redevelopment, should the existing planning permission 18/0321 be subject to extensive change. However, on reflection the policy is clear, but can also re-affirm that the minimum amount, typology and affordability of employment floorspace provided as part of 18/0321 should be re-provided. On this basis, to reduce confusion about the status of the site, which essentially has planning permission for a residential led development which is a significant part of the Council's housing trajectory the SIL status of the site on the policies map will be removed and wording in BSWA7 and BE2 suitably amended. Once the Plan has been adopted, an interactive policies map will be produced, similar to that which exists for the current Local Plan. This will be annotated, including links to relevant policies such as BE2.	BSWSA7 amend: "...Consistent with planning permission 18/0321 due to the site's historic SIL designation a minimum of 17,581 sq.m. of employment floorspace <u>of the typology and affordability associated with that planning permission</u> must be re-provided as part of the development. <u>Due to Brent's classification as a 'provide capacity' borough, should the opportunity arise, for example through co-location north of the river Brent or through intensification to the south, greater provision of industrial floorspace will be supported...</u> " BE2 amend: "Northfields (<u>east and west of Grand Union Canal</u>)" BE2 amend: "Northfields (east of Grand Union Canal) SIL Co-location within site boundary of extant planning permission subject to as a minimum providing the amount, typology, and affordability of employment floorspace consistent with planning permission 18/0321. Intensification on the remainder of the SIL." Policies Map amend: Remove Northfields 18/0321 site north of

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					the Brent River from SIL designation.
6.4 Economy and Town Centres	BE2	St. George	Object. De-designate SIL at the Trading Post Site, Heather Park Drive. The Northfields site has effectively removed the SIL allocation from the 18/0321 site area. This provides the opportunity to regenerate the wider area through co-location within the remaining SIL. This site in particular can retain industrial capacity whilst also providing additional residential above without impact on the SIL function. London Plan Policy E5 and E7 confirms that there may be scope for selected parts of SILs to be consolidated. This should be done through a carefully co-ordinated plan-led approach.	Noted. It is accepted that the Northfields scheme essentially will remove all of that site along Beresford Avenue from industrial use. Notwithstanding this, the GLA has identified that it is important to retain/ intensify the remaining SIL to meet the borough's 'provide capacity' status. Although located adjacent to residential the site is in a prime location as of proximity to the north circular road and as such its retention is considered justifiable.	No Change.
6.4 Economy and Town Centres	BE2	Savilles on behalf of client	Support approach, however, when co-location is referenced, residential should be specifically mentioned. Masterplan approach is not justified as sites such as Capitol Way Valley allocates intensification and co-location. Therefore, change wording as follows: Policy wording: 'On these sites intensification through co-location with residential or other identified uses will be supported, subject to a plan-led allocation approach where applications are consistent with this plan or through a comprehensive masterplan approach produced with or agreed by the Council demonstrating the following will be achieved...' para 6.4.1 amendments: '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 plan-led approach consistent with the allocations within this plan or through a masterplan-led approach. In both approaches it will need to be demonstrated that 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 Staples Corner. Where applications are made to be consistent with the allocations in this plan, the developer will need to demonstrate that an approach has been taken that considers the relationship with surrounding sites and the wider area, and does not prejudice the overall vision being delivered. masterplans are developer-led, 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.'	Noted. It is acknowledged that the most common form of relocation will involve the inclusion of residential, however, to allow for other appropriate uses it has not been prescribed. This will help encourage the inclusion of other uses. The wording within policy BNSA1 aligns with policy BE2, with both requiring that employment land is intensified with successful co-location. To gain support for the wider range of uses of these sites, the Council will require the GLA's support, who will require masterplanning to be undertaken to be convinced that there will be no overall loss of industrial and that more than this the Council is seeking to intensify the industrial capacity of these areas.	No Change.

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6.4 Economy and Town Centres	BE2	Blue Coast Capital	Support approach towards delivery of affordable housing in LSIS sites, however, policy should be clearer about the quantum's of employment floorspace which will be sought.	The London Plan is clear in setting out the minimum amount of industrial floorspace required, which is the Council's approach as a minimum. Further work is required to work with OPDC and the GLA to understand how much of the 43 hectares equivalent additional requirement identified by the GLA should be delivered in Brent. The Council considers that the minimum requirements of the GLA should deliver the necessary uplift required on the basis of its evidence, but needs this to be approved by the GLA.	No Change.
6.4 Economy and Town Centres	BE2	Braeside Properties Limited	Inclusion of 43-47 Alperton Lane within LSIS and subsequent development restrictions is not justified. The site could help promote economic and residential development within the borough. This would reduce the flexibility of the site to respond to market demands, and would not align with proposed mixed-use plans to the east.	In relation to this site the new London Plan identified Brent as a borough which is to provide industrial floorspace capacity. Following this, Brent undertook an Industrial Land Audit which provides recommendations to increase industrial floorspace through intensification, co-location and other mechanisms, and allowed the potential to extend current SIL / LSIS boundaries to support the aim of providing industrial floorspace capacity. The council maintains that this industrial site (comprising factories, warehouses and premises) is a natural extension to the LSIS in terms of function and therefore should be included within the LSIS in order to protect their industrial function and support the identification of Brent as a provide capacity borough. Brent's Industrial Land Audit identified that this LSIS was not appropriate for co-location. Because this parcel of land has been included in the Alperton South LSIS (due to being a natural extension to it) it is not considered to be appropriate for co-location. Additionally, the West London Employment Land Review has identified that LSIS sites such as this are likely to be viable to come forward solely with industrial uses and would not require any residential development to help subsidise this.	No Change.
6.4 Economy and Town Centres	BE2	Thersa	I am a disabled person with work experience in supporting disabled people. No mention of high unemployment levels experienced by the disabled. The plan should address this by improving local business access to employees and customers. It should be a requirement for businesses to have transparent plans to improve such access. This is in association with the purple pound, and the disabled employment and pay gaps. This should be considered proportionately with the number of disabled people within the borough and their struggle to find appropriate work. Significant consultation with key stakeholders will be required. Does Brent have a disability forum? It appears Brent closed down (or allowed to close down) the Brent Association of Disabled People.	Noted. The Local Plan only has the capacity to prescribe how future development should come forward. Therefore this is outside the remit of the document. However, a number of policies make clear the requirements for inclusive design. These requirements are further strengthened by the guidance laid out within the Brent shop front SPD. Policy BT1 requires developers to meet the Healthy Streets Principles and provide access for all. Policy DMP1 also requires developments to be satisfactory in terms of means of access for all. This is further elaborated within draft new London Plan policy D3 with regards to inclusive access. Brent does have a disability forum which is chaired by a Councillor.	No Change.

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6.4 Economy and Town Centres	BE2	Ikea	Remove SIL from Ikea land as current use is retail and offices, not industrial. The land will not be developed for industrial uses, is a peripheral location, and already generates significant employment. The council has not justified the designation of SIL. The GLA have accepted the sites non-industrial use.	Noted. The site has not been newly designated as SIL, and existed as SIL prior to the adoption of this new Plan. SIL is given strategic protection in the draft new London Plan, and is to be sustained and enhanced under policy E5. Brent is identified as a 'Provide Capacity' borough in the new London Plan and has been set a significant target on the provision of new industrial floorspace. To meet this target the Council will require all appropriate land to be intensified with industrial uses. This includes all existing SIL. The site is not peripheral, being within close proximity to the North Circular Road.	No Change.
6.4 Economy and Town Centres	BE3	Alun Evans	The supporting text of policy BE3, paragraph 6.4.23 sets very prescriptive criteria for Local Employment Sites for part b) of BE3. It is considered that this paragraph should be amended to exclude development within growth areas as it could impact upon viability of proposals which are residential or commercial focused. This does not reflect the NPPF in terms of meeting delivery objectives including housing.	Noted. The amended London Plan places significant requirements on Brent compared to the FALP version, not least the need to provide additional capacity for industrial, but also the identification of Wembley as a priority location for office. As such the Council is seeking to balance up competing needs such as these requirements with the desire to increase housing delivery.	No Change.
6.4 Economy and Town Centres	BE3	Dominvs Group	Object: The policy is not justified being inconsistent with draft London Plan Policy E7 D 2). This states that allocated mixed-use or residential development proposals on Non-Designated Industrial Sites should be supported. The policy has not been positively prepared and is ineffective as supporting paragraph 6.4.23 requirements are disproportionately onerous relative to the policy content. Such requirements include an increase in the amount of employment floorspace on the site in the B use class. The policy should be amended to: add an 'or' to the end of part b) and add a part c) which reads 'where it has been allocated for residential or mixed-use.' (or similar). Parts a) and b) should be removed from paragraph 6.4.23 to make requirements consistent with and proportionate to policy wording.	Taking account of GLA policy responses to the Local Plan on sites with existing site specific allocations for non-industrial development on industrial sites it would appear that London Plan policy E7 in relation to Non-designated Industrial Sites is not retrospective in its application to existing Local Plan allocations, but expects such allocated sites to be justified post the London Plan's adoption as part of the respective borough local plan adoption process.	No Change.
6.4 Economy and Town Centres	BE4- BE5- BHC4	Sudbury Town Residents Association	Paragraph 5.7.9 identifies Sudbury as a Town Centre. Sudbury is too small to be identified as a 'Town Centre', meeting local needs only, and should therefore not include any Intensification Corridors. Paragraph 5.7.11 states the centre has a high vacancy rate, but one of the highest proportions of night-time economy uses which is contradictory. The Sudbury Town Neighbourhood Plan does not support betting shops, 24-hour fast food outlets or liquor shops as they lead to unpleasant environments. This constitutes the existing 'night-time economy'. To base new development upon this detrimental feature of the centre is unacceptable.	Noted. Sudbury is listed as a Local Centre under the town centre hierarchy in paragraph 6.4.27 as is the case in the new London Plan. Paragraph 5.7.11 notes that Sudbury Town Centre essentially meets Local Needs. Intensification Corridors have been identified due to their proximity to amenities, in areas which have high public transport accessibility and are located on wide roads, having capacity to accommodate taller buildings. Although the vacancy rate is relatively high, the proportion of the offer which does exist, tilts largely toward the night-time economy. Policy BE5 seeks to restrict the proliferation of betting shops, adult gaming centres, pawnbrokers, take-aways, and shisha cafes. Night-time economy refers to all economic activity taking place between 6pm and 6am. The night time economy will be supported across the borough in accordance with draft	No Change.

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				London Plan policy HC6. Sudbury will not however be prioritised for this, with delivery being pushed toward the town centres of Wembley, Kilburn, Cricklewood and Wembley Park. It is not possible to restrict the sale of alcohol in off licences through the planning system.	
6.4 Economy and Town Centres	BE5	Thersa	Policy could go further considering residents poor physical, mental and financial health and the recent proliferation of these uses. Maybe we should ask why other businesses don't want to open within the borough. Areas of the borough are run down. This does not attract a mix of shops and has led to significant closures within areas such as Church End and Harlesden. There has been a managed decline which will be impossible to fully repair.	Noted. The policy seeks to restrict further proliferation of uses detrimental to residents health, whilst ensuring there is sufficient space for key uses to enable Town Centres to function as required. High street decline is a result of numerous inter-related issues, and is noticeable across the nation. This is primarily a result of the change in shopping patterns and the growth of online shopping. Central government has identified a new High Street Fund, which the Council will look to secure funding from to support town centres. This will assist in the maintenance/ enhancements of poorer environments within the boroughs Town Centres, helping to improve vitality/ viability, and ultimately resident health.	No Change.
6.4 Economy and Town Centres	BE5	Kentucky Fried Chicken (Great Britain) Limited	<p>Not positively prepared. Criteria A, B, C, and E headed 'takeaways' are not based on any objectively assessed development requirement, and there is no evidence on optimum mix, separations, school zones, or frontages generally. A and B will create areas for which no new A5 would be permitted, and because PD rights only allow changes of use from (and not to) A5, over time these areas would have no A5 uses. No assessment has been made of the number of households affected or projected nutritional intake in those areas, so it is impossible to strike a balance with the potential benefits of job creation, facilities, viability, accessibility or footfall.</p> <p>Not justified. Only deals with A5 uses (hot food takeaways), and does not address hot or cold drinks takeaways and cold food takeaways within classes A1 or A3. Whilst food of high energy density/ poor nutritional value is available at hot food takeaways, there is evidence that other food/drinks facilities are similar or worse in that respect (Robinson, 2018), and therefore focusing on A5 cannot be justified. The June 2014 survey of takeaway use among students explicitly set out to support the policy, relied on self reporting and assumed students that did not eat school dinners or sandwiches used takeaways. Criterion b now also includes primary schools, increasing the affected area significantly. Appeal decisions (e.g. APP/P4415/A/11/2159082 and APP/W4515/W/16/3154960) are clear that pupils are carers responsibility.</p> <p>Not effective. Criterion b requires evidence of a causal link between proximity of A5 to schools and incidence of obesity, however, this evidence is limited and conflicting. As this has not been established, it will be impossible to monitor policy effectiveness and is unclear whether areas impacted would be reduced, expanded or withdrawn in response to obesity level changes.</p> <p>Not consistent with NPPF. NPPF seeks to enable healthier lifestyles by creating, not restricting choice, and increasing access to recreation and</p>	Noted. Draft new London Plan policy E9 states that development proposals containing A5 uses will not be permitted where they are within 400m of a primary or secondary school. The policy also states that boroughs should consider the appropriateness of locally defined thresholds to reduce over concentrations of A5 uses. This has been supported by the panel report. The panel report acknowledges the difficulties in identifying direct causation with regards to childhood obesity, however identifies that national guidance and common sense justify this approach. The panel found that the existing 7000 A5 premises in London should be sufficient in providing for need and supporting the industry. To retain the retail function of the town centre, an upper limit of 6% of a town centre frontage has been set to restrict the over concentration of A5 uses. The approach taken does not include other drinks/ food takeaways as this is not as strongly supported by evidence, and neither is it supported within the draft new London Plan. The Council is essentially retaining its current policy which has been previously accepted at examination based on local evidence showing the link between children's eating behaviours and the proximity of takeaways. As such the policy is considered to still be justified.	No Change.

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			<p>health services. Such services should be within walking distance to public transport and other facilities. This policy would reduce choice and restrict access by preventing a main town use being placed within a town centre. There has been no assessment of how the policy would impact specific town centres. PPG states to limit proliferation, policies should have regard to proximity, incidence of obesity/poor health, and over concentrations. Brent has no such evidence.</p>		
6.4 Economy and Town Centres	Para 6-4-51	Thersa	<p>Local Plan should identify specific actions which will be taken to improve high streets. This should specifically reference disabled, step-free access to shops.</p>	<p>Noted. The Local Plan only has the capacity to prescribe how future development should come forward. Therefore this is outside the remit of the document. The priority town centres will have action plans taken forward by the town centre managers that cover a wide range of aspects that the Council as a whole can address. A number of policies make clear the requirements for inclusive design. These requirements are further strengthened by the guidance laid out within the Brent shop front SPD. Policy BT1 requires developers to meet the Healthy Streets Principles and provide access for all. Policy DMP1 also requires developments to be satisfactory in terms of means of access for all. This is further elaborated within draft new London Plan policy D3 with regards to inclusive access. Brent does have a disability forum which is chaired by a Councillor.</p>	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.4 Economy and Town Centres	BE9	Dominvs Group	Wembley Strategic Cultural Area's omission as a suitable location for hotels and other visitor accommodation (relative to the previously published version of the policy) is unjustified and inconsistent with adopted and emerging London Plan policy. It is also inconsistent with the 'Central Place' vision and Policy BCGA1, which both specify hotels as contributing to Wembley Growth Area's mix of uses. The reference to hotels and other visitor accommodation being appropriate in sites allocated in the draft Local Plan is supported. Wembley Strategic Cultural Area should be reinstated as an appropriate location for hotels and other visitor accommodation.	The Strategic Cultural Area policy was associated with the Wembley Area Action Plan and had limited effect in steering/ delivering an enhanced cultural offer and has essentially been usurped by permissions granted, predominantly for residential development, apart from along the main town centre spine of Olympic Way. The current allocation for Euro-car parts identifies the potential for a hotel consistent with its previous allocation in the Action Plan which can support the functioning of the stadium, SSE and London's central tourist attractions consistent with London Plan policy. The Council has continued to support this use in pre-application discussions. Elsewhere BE9 seeks to guide the development of Hotels towards areas with demand, and that are sustainably located in close proximity to key transport nodes. Where exceptions are considered as appropriate, hotel use has been identified within the allocated use of site allocations. The policy identifies Wembley Town Centre as a location appropriate for hotel use, and therefore aligns with the vision and policies BCGA1 and BP1 as it overlaps with the growth area. Site allocations within the growth area have also been identified as appropriate for hotel provision, therefore facilitating the delivery of BCGA1, BP1 and the Central Place Vision. It was seen as necessary to make this distinction to bring the policy in line with the Wembley Area masterplan, and extant outline permissions.	No Change.
6.4 Economy and Town Centres	BE9	Amafhh Investment Limited	Policy BE9 supports hotel development in the town centres of Wembley and Kilburn. Hotels and conference centres help support a vibrant business environment. The policy should be amended to support visitor accommodation and attractions in designated growth areas, such as at Staples Corner.	Noted. Hotels are identified as main town centre use in national policy to which the sequential approach applies. Staples Corner is not a main town centre nor in close proximity to one. The policy seeks to guide the development of Hotels towards areas with demand, and that are sustainably located in close proximity to key transport nodes. This is supported by London Plan policy E10. Wembley and Kilburn Town Centres are Major centres, with good links directly into central London. Further provision in Wembley will help support its status as a destination for sports and entertainment. Provision in Kilburn is currently lacking, and is promoted to support the function of London as an international tourist destination. Staples Corner does not have strong public transport links into central London, and neither is it a tourist destination in itself. Visitor Accommodation will be directed toward town centres, not Growth Areas, as is required by draft London Plan policy. In addition its identification as SIL means that a hotel is not an acceptable use as it does not fall within the industrial use classification.	No Change.

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6.4 Economy and Town Centres	Blank Economy and Town Centres	Sudbury Town Residents Association	<ul style="list-style-type: none"> Economy and Town Centre Policy should not apply because Sudbury Town is a Local Centre not a Town Centre. 	<ul style="list-style-type: none"> Sudbury Town is designated as a "local centre" in the town centre hierarchy (par 6.4.27), but all local centres, district centres and major centres are designated as "town centres". As such Sudbury Town is considered to be a town centre. As such the town centre and employment policies will apply. 	No Change.

6.5 HERITAGE AND CULTURE

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.5 Heritage and Culture	BHC1	Mary Duffy	A low-rise neighbourhood is a heritage asset in itself, and the quiet residential nature of Brent is being replaced with high rise monstrosities.	The Council has to plan to meet the needs associated with the predicted growth in population. It has sought to concentrate tall building development in locations with greater accessibility to public transport and outside conservation areas. As such the majority of the character of the borough will remain essentially low rise suburban in character over the lifetime of the Plan.	No Change.
6.5 Heritage and Culture	Para 6-5-18	Historic England	Remove: "Its archaeological discoveries are scarce; sites have been built over and there are limited places where archaeologists could investigate." This significantly downplays the archaeological potential without proper assessment. Substantial areas with limited development to date mean potential for previously undiscovered archaeological remains.	This is considered factual, however it potentially can be seen to downplay archaeological potential without proper assessment. As such it is proposed to slightly amend the wording.	Paragraph 5.5.18 amend to: "...Its archaeological discoveries <u>to date</u> are scarce; ..."
6.5 Heritage and Culture	Para 6-5-19	Philip Grant (Wembley History Society)	Correct reference should be to BHC1, not BD1.	BHC1 should be the correct policy to reference.	Paragraph 6.5.19 amend: "...Policy BD1 <u>BHC1</u> therefore.."
6.5 Heritage and Culture	Para 6-5-26	Historic England	Recommend the following is added to the end of this paragraph: "...evaluation, in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works. Applicants should consult with Historic England's Greater London Archaeological Advisory Service should take place in order to determine the scope of the archaeological requirements."	This proposed addition is considered to provide further clarity and a useful source of additional advice when considering archaeological significance.	End of paragraph 6.5.26 amend: "...evaluation, <u>in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works. Applicants should consult with Historic England's Greater London Archaeological Advisory Service should take place in order to determine the scope of the archaeological requirements.</u> "
6.5 Heritage and Culture	BHC2	Quintain	Protecting the views of the National Stadium is supported but Wembley's status as a growth area must also be recognised. The following should be added to the policy: "Development must not be to the significant detriment of the following views as shown on the Policies Map of the National Stadium Wembley."	It is recognised that the area around the stadium is a growth area identified for a substantial amount of development. Nevertheless, the stadium is an iconic feature of national significance. The heights allowed in existing planning consents show that the opportunity for tall and high density buildings exist, without in most cases necessarily having a detrimental impact on protected views. The need for development to not cause significant harm is considered to weaken the policy below that set out in London Plan policy HC4 London View Management Framework, which boroughs are encouraged to use when identifying Local Views as set out in London Plan Policy HC3 criterion g).	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
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. Insert text: "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 where the London Borough of Brent is Local Planning Authority."	It is agreed that some of the views identified originate outside the area where the Council is local planning authority. Although the Council cannot determine applications outside its area, it has made other relevant planning authorities aware of the views through the Statement of Common Ground/ Duty to Co-operate so that they recognise them as a material consideration in the determination of planning applications.	Amend by inserting at the beginning of paragraph 6.5.29. <u>"17 views have been identified. Two views originate outside the area where the Council is Local Planning Authority. The Council has made OPDC and LB Ealing aware of each view's origins and it will be for them to determine the weight to give to the importance of the views when considering proposed development in their respective areas. London Plan..."</u>
6.5 Heritage and Culture	BHC2	Mary Duffy	Quintain's developments have destroyed stadium views with Brent Council pandering to their every demand. Boxpark is turning into a white elephant as is the entire build to rent endeavour. Continued FA ownership of this would not have allowed this horrible building project.	The proposed policy has stronger wording on considering the impacts of developments on views.	No Change.
6.5 Heritage and Culture	BHC3	Mary Duffy	Disagree with the Tricycle Theatre being rebranded as The Kiln. Pubs are being lost to developers with little to no thought to their cultural significance. The Queensbury pub is an example of the vandalism unleashed by the Brent Planning Committee.	The Council has no control over what the Theatre chooses for its name. A pub protection policy since 2016 has prevented the loss of pubs, or ensured their re-provision in development. The Council's planning committee refused the redevelopment of the Queensbury on four occasions. The second of these decisions was overturned on appeal. The future of the pub was subject to extensive discussion (around 2 days of the 4 days of the public inquiry). The Inspector considered that the benefits associated with the new pub outweighed the potential harm caused by the loss of the existing. As part of that redevelopment a larger purpose built public house will be re-provided, with defined community access provisions to provide space for voluntary groups at a peppercorn rent.	No Change.
6.5 Heritage and Culture	BHC4	Mary Duffy	Business rates cripple all but the most profitable of bars and restaurants, meaning not much good Brent night time venues	Business rates are set by national government.	No Change.
6.5 Heritage and Culture	BHC5	GLA	Between 2001 - 2017 Brent lost 42% of its public houses. Policy BE4 should seek to protect existing public houses that are of heritage, economic, social or cultural value and should support proposals for new public houses where this would be in accordance with draft London Plan policy HC7. BE4 and BE5 should be amended accordingly, rather than resisting development of new A4 uses including public houses. Reference to the CAMRA Public House Viability Test is welcome.	Policy BHC5 seeks to protect existing pubs. Policy BE4 seeks to protect primary retail frontages, other areas of town centres have sufficient flexibility in their policy to accommodate public houses, which is further reiterated in Policy BHC4 Brent's Night Time Economy in relation to four specific town centres.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.5 Heritage and Culture	BHC5	Mary Duffy	Pubs are being lost to developers with little to no thought to their cultural significance. The Queensbury pub is an example of the vandalism unleashed by the Brent Planning Committee.	A pub protection policy since 2016 has prevented the loss of pubs, or ensured their re-provision in development. The Council's planning committee refused the redevelopment of the Queensbury on four occasions. The second of these decisions was overturned on appeal. The future of the pub was subject to extensive discussion (around 2 days of the 4 days of the public inquiry). The Inspector considered that the benefits associated with the new pub outweighed the potential harm caused by the loss of the existing. As part of that redevelopment a larger purpose built public house will be re-provided, with defined community access provisions to provide space for voluntary groups at a peppercorn rent.	No Change.
6.5 Heritage and Culture	Blank Heritage and Culture	Canal & River Trust	<p>The Grand Union Canal and Welsh Harp reservoir has historical significance that should be better recognised in the Plan. It played a role in the industrial heritage of its adjacent areas. Protection and enhancement of canal infrastructure is important in its own right, as historic transport infrastructure, for example the Twyford aqueduct. Equally, so is the protection and enhancement of the spaces around it, which impact on the setting of the historic canal.</p> <p>Appropriate recognition of the historic significance of the Canal within the Local Plan will support all the aims of paragraph 185 of the NPPF more effectively and be consistent with London Plan policy aims. Further discussions are sought with LB Brent about the designation of a canal conservation area, as is the case in neighbouring boroughs e.g. LB Ealing's Canalside Conservation Area. Designation would help develop and define a sense of place. It would enable more robust protection of its character, including its precise alignment, the route and constant grade of the towpath.</p>	The Council agrees that the canal has some historical significance. As such it will amend the Plan to make reference to this. The majority of the elements that the Trust mentions are under its control, e.g. alignment, route and grade of tow path as in the borough they are on its land.	<p>Paragraph amend: "<u>6.6.30a The River Brent, which gives the borough its name, formed a natural division between Willesden and Wembley. The name 'Brent' is Old English, from Celtic words meaning 'sacred waters'. The River Brent is formed of a number of tributaries which join and flow to the borough of Ealing. Despite much of it being culverted, it is significant to Brent's history and culture. Just as important are the Grand Union Canal and Brent Feeder Canal which are completely artificial watercourses and important as historic transport infrastructure. By 1820 there was not enough water to supply the canal, so under an Act of Parliament in 1819, the Regent's Canal Company decided to dam the River Brent and create a reservoir, an artificial lake, in order to guarantee a sufficient water supply. These water landscapes are recognised as non-designated heritage assets for their historic significance to protect and enhance cultural and heritage value to Brent. Equally, so is the protection, promotion and enhancement of their curtilage, which impact on the setting of these heritage assets.</u>"</p> <p>Paragraph 6.6.31 amend "<u>Canal Cottage, Twyford Abbey Road</u></p>

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					<u>(now in OPDC area) and Reservoir Cottage, in Birchen Grove, are locally listed but much of the twentieth-century development and canal heritage is not protected, and in particular, deserves better recognition. For example, the canal is supported by two aqueducts, one as it passes over the River Brent, the Twyford Aqueduct and the other over the North Circular Road (A406). Other historic features of the canal include a WWII concrete pillbox, bridges and concrete drainage mechanisms. The appropriate....."</u>
6.5 Heritage and Culture	Blank Heritage and Culture	Mary Duffy	The West London Orbital should not go through conservation areas.	The West London Orbital route follows existing rail infrastructure. Works to assist its delivery will predominantly be within the existing rail corridor.	No Change.
6.5 Heritage and Culture	Blank Heritage and Culture	Thersa	Culture: Support need for more arts and culture. It is a shame Bridge Park needs to be redeveloped as has had short shelf-life, wasting public money. Buildings should last at least 50 years, something which should be written into contract.	Culture: Bridge Park was delivered through the conversion of an existing building. Its redevelopment allows for a much better facility to be built that meets a wider range of recreational needs. It will be built to BREEAM excellent status as a minimum and as such should be durable for a significant period.	No Change.
6.5 Heritage and Culture	Blank Heritage and Culture	John Cox	(3) There is one "Section 6.2" on pages 281 and another "Section 6.2" on page 329. One Section 6.2 is enough, thank-you.	3. 6.2 Heritage and Culture should be 6.5	3. Heritage and Culture Chapter cover page amend: " 6.2 6.5"

6.6 GREEN INFRASTRUCTURE

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.6 Green Infrastructure	Para 6-6-10	Environment Agency	Recommend amendment to accurately reflect the watercourses in LBB: "6.6.10 Brent's existing blue infrastructure or Blue Ribbon Network, includes the River Lower Brent, Welsh Harp, Grand Union Canal - Uxbridge to Hanwell Locks, Slough Arm, Paddington Arm, Wealdstone Brook, Brent Feeder Canal and Dollis Brook and Upper Brent."	Noted. See proposed changes.	Paragraph 6.6.10 amend: "Brent's existing blue infrastructure or Blue Ribbon Network, includes the <u>River Lower Brent</u> , <u>Welsh Harp</u> , Grand Union Canal <u>Paddington Arm</u> , Wealdstone Brook, Brent Feeder Canal and Dollis Brook <u>and Upper Brent</u> ."
6.6 Green Infrastructure	BGI1	Environment Agency	<ul style="list-style-type: none"> • Pleased to see section d). We recommend that as part of this policy or supporting statements, the DEFRA Biodiversity Metric on net gain is referenced. The DEFRA Biodiversity Metric 2.0 provides a way of consistently measuring and accounting for biodiversity losses and gains resulting from development or land management change. 	The DEFRA Biodiversity Metric 2.0 is noted. It is considered that point d) is sufficient to ensure a net gain of biodiversity is achieved through development and ensures that the policy is future-proof with regard to any potential changes or improvements to tools used to measure and account for biodiversity losses and gains. Nevertheless the inclusion of reference to the Defra Biodiversity Metric 2.0. in OTHER GUIDANCE is considered appropriate.	Make reference to the Defra Biodiversity Metric 2.0. as set out in the response to Natural England.
6.6 Green Infrastructure	BGI1	Environment Agency	<ul style="list-style-type: none"> • Section g) Welcome the inclusion, however we recommend the statement is strengthened to ensure development does not impede achieving the future goals of the environmental improvement objectives of the Water Framework Directive and Thames River Basin Management Plan. 	It is considered that the existing wording is sufficient in requiring development to seek to enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive and Thames River Basin Management Plan. This is considered to be in line with the draft new London Plan, which states that Development Plans should promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan.	No Change.
6.6 Green Infrastructure	BGI1	Environment Agency	<ul style="list-style-type: none"> • In Reg 18 response we highlighted our desire for the plan to specifically address the risk of INNS. In the Brent Local Plan Preferred Options Consultation Responses, October 2019 stated this matter is addressed in relation to policy BGI1 Green and Blue Infrastructure. We however do not believe the policy does directly address this issue and we recommend it is amended to include additional wording to combat the potential harmful impact of INNS on people, places and the environment. We recommend Policy BGI1 is amended to include how developments will manage and if possible eradicate invasive non-native species for the safe enjoyment of green and blue spaces. 	It is considered that the management and eradication of non-native or invasive species could be considered at detailed application stage of any schemes coming forward, and could be managed as part of a CEMP on a site by site basis, rather how such risk would be managed being outlined in policy.	No Change.
6.6 Green Infrastructure	BGI1	Woodland Trust	<ul style="list-style-type: none"> • We support that residential developments should have access to the natural environment, including to woodland. The Woodland Trust has developed a Woodland Access Standard to complement Natural England's Accessible Natural Green Space Standard. We recommend that: <ul style="list-style-type: none"> o No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. o At least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes. 	Recommended guidance noted. The recommendations regarding residents not having to live more than 500m from one area of accessible woodland of no less than 2ha in size and there being at least one area of accessible woodland of no less than 20ha within 4km of people's homes is noted, however, the borough's urban nature and limited land availability coupled with being designed as a 'provide industrial capacity' borough and need to provide housing means that meeting these recommendations would be a challenge and realistically undeliverable given the demands on land.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.6 Green Infrastructure	BGI1	Woodland Trust	o We further recommend adding that a target tree canopy cover of at least 20 per cent will be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.	The draft new London Plan outlines the Mayor's target of increasing tree canopy cover in London by 10% by 2050. Given the constraints that Brent faces in terms of land availability, a target of 20% is not considered to be realistic, however the Mayor's Greener City Fund continues to plant trees in the borough and the council will continue to support tree planting through Neighbourhood CIL and S106.	No Change.
6.6 Green Infrastructure	BGI1	Mary Duffy	The policy neglects to mention Neasden Recreation Ground. Brent has not cut the grass in two years and the residents clear the litter from the park. Brent should in-house its parks service as Veolia has neglected its maintenance. It seems to be a deliberate policy of managed neglect. Whereas nearby Gladstone Park gets classed as an "ornamental park". It has been featured on News at Ten and "You and Yours" on Radio 4 with myself guiding Tom Clarke around what is a SSSI that has not been visited by Natural England in over 6 years. Brent had allowed it to become a homeless camp until residents cleaned it up. The chair of Natural England later resigned when the collective negligence of Natural England and Brent Council had been exposed.	The policy does not mention the existence of Neasden Recreation Ground as it seeks to ensure that future development protects and enhances existing green and blue infrastructure, and sets out expected open space provisions (or associated contributions) and criteria to be met from new developments. Neasden Recreation Ground is shown on the proposed policy maps and is designated as both Metropolitan Open Land and Open Space. The management arrangements of Neasden Recreation Ground, or other existing recreation grounds which are managed by the Council, are not a material planning consideration matter for the Local Plan.	No Change.
6.6 Green Infrastructure	BGI1	Department for Education	Policy requires major developments to provide public open space. This implies it only relates to residential development by reference to a ratio against the residential population. It should be made clear that this is only in reference to residential developments, stating 'major residential developments...'	The policy in terms of standards does only apply to residential development, as such the proposed change is considered appropriate.	BGI1 amend: ".....Major residential developments outside Growth Areas will be expected to provide 0.81 sqm of public open space per resident in the following manner:...."
6.6 Green Infrastructure	BGI1	Environment Agency	Agree with the policy, find it sound and pleased to see sections addressing enhancement of blue infrastructure, landscaped setback, biodiversity net gain, water quality and seeking enhancements under the Water Framework Directive and Thames River Basin management Plan.	Noted that the policy is considered to be sound.	No Change.
6.6 Green Infrastructure	BGI1	Environment Agency	• Set-back: Welcome the inclusion of Paragraph 6.6.30. For clarity, we recommend that the 8 metre set back requirement is referenced in the main policy text to ensure it is clear for users.	As noted in paragraph 6.6.30, the 8m set back is a EA requirement, which is subject to byelaw and agreement separately with the EA. The council does not consider the need for this to be replicated within this policy. Sites which are at risk of flooding will be required to submit a Flood Risk Assessment and will therefore be assessed on a case by case basis in accordance with national policy, the new draft London Plan, and local plan policy BSUI3.	No Change.
6.6 Green Infrastructure	BGI1	Natural England	We welcome policy inclusion for achieving net gain in biodiversity for all developments. When delivering this policy we recommend use of <ul style="list-style-type: none"> • Natural England's recently released Defra Biodiversity Metric 2.0. Detailed guidance and a tool to apply the metric is available. • The incorporation of the 10 best practice principles developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain. We welcome policy inclusion for retaining existing blue and green infrastructure and adding/enhancing where possible. <ul style="list-style-type: none"> • A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Evidence of a strategic approach can be underpinned by Green 	Support Reference to the Defra Biodiversity Metric 2.0. will be made, as well as 10 best practice principles developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain in Other Guidance.	After the Evidence Base section amend: "OTHER GUIDANCE Biodiversity Metric 2.0. DEFRA/ Natural England Biodiversity net gain. Good Practice Principles for Development. A Practical Guide CIRIA/CIEEM/IEMA"

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			Infrastructure Strategy. Please refer to Chapter 8 of the draft London Plan for further policy guidance when delivering the Local Plan.		
6.6 Green Infrastructure	BGI1	Woodland Trust	<ul style="list-style-type: none"> We welcome the retention and enhancement of existing trees, woodland, and hedgerow cover on development sites, and an appropriate number of suitable replacement trees will be required to be planted. We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. 	Rather than proposing set ratios for replacement, it is considered that that requirement b) of policy BGI will ensure that new trees / replacement trees will achieve equivalent canopy cover (or a financial contribution for off-site tree planting of equivalent canopy cover). The council considers that this allows for more flexibility than applying replacement ratios. The draft new London Plan policy G7 also requires replacement trees to provide adequate replacement based on the existing value of trees removed as determined by an appropriate valuation system such as i-tree. The council acknowledges that it does not have full knowledge of the existing tree stock and that developing a database such as i-tree Eco will enable setting future targets and focusing on tree-deficient areas. In addition the urban greening factor has a favourable score against trees which should promote their inclusion in developments.	No Change.
6.6 Green Infrastructure	BGI1	Woodland Trust	<ul style="list-style-type: none"> Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019). 	The council agrees that integrating trees into developments early provides benefits and paragraph 6.6.40 of the local plan states that trees should be designed into a development scheme from the outset to support this.	No Change.
6.6 Green Infrastructure	Para 6-6-34	Environment Agency	This paragraph states: "The Water Framework Directive is a European Union Directive which commits all member states to achieving a 'good' status' for all water bodies by 2027." Suggested amendment: all member states are required to achieve 'Good' status or 'Good Ecological' status by 2021, or if an extension is granted, then 2027.	Noted. See proposed change.	Paragraph 6.6.34 amend: "The Water Framework Directive is a European Union Directive which commits all member states <u>are required</u> to achieve achieving a 'good' status' or 'good ecological' status by 2021, or if an extension is granted, then for all water bodies by 2027."
6.6 Green Infrastructure	Para 6-6-36	Environment Agency	Pleased to see reference to deculverting and naturalising watercourses. However, strongly recommended the wording is amended to: these measures are desirable for all development adjacent to watercourses and should be considered wherever possible, not just as a mitigation measure. This is important in achieving the requirements of Policy BGI1 in meeting the objectives of the Water Framework Directive and Thames River Basin Management Plan.	Noted. See proposed change	Paragraph 6.6.35 amend: "In Brent <u>all</u> waterside developments and other developments....." Paragraph 6.6.36 numbering amend: " 6.6.36 a) " and remainder of bullets subsequent.
6.6 Green Infrastructure	Para 6-6-36	Environment Agency	Formatting error: The first line of paragraph should be point a), and not a new numbered paragraph.	Noted. See proposed change	Paragraph 6.6.36 numbering amend: " 6.6.36 a) " and remainder of bullets subsequent.
6.6 Green Infrastructure	BGI2	Mary Duffy	Lack of common sense where contractors see trees as an expense.	Policies in relation to Council's wider the management (cutting down, pruning etc.) of existing trees are not a material planning consideration matter for the Local Plan. Information on Brent's tree management strategy can be found here: https://www.brent.gov.uk/services-for-residents/environment/trees-hedges-and-grass-maintenance/	No Change.

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6.6 Green Infrastructure	BGI2	Department for Education	Policy requires the re-provision of canopy cover or off site contributions. This does not differentiate between the different quality of trees, and could therefore lead to onerous burdens for the delivery of educational facilities where such requirements may be difficult to deliver given the size, nature and scale of educational facilities footprints and open space requirements which typically do not allow for extensive tree planting. This may also create safeguarding and management issues for school operators. This policy should therefore be flexible when applied to infrastructure, community and recreation uses.	Brent considers trees and woodlands to be vital components of the borough's landscape and green infrastructure with associated benefits. As noted in the representation, quality of trees can vary, but the London Plan encourages the "Right Tree for a Changing Climate" approach. The council supports this, and this policy will allow for poor-quality trees to be replaced or re-provided elsewhere with newly planted trees which will thrive in a changing climate. It is considered that the policy already allows for sufficient flexibility where retention or re-provision is not possible on site for an off-site financial contribution towards off-site tree planting to be made.	No Change.
6.6 Green Infrastructure	BGI2	Woodland Trust	Recommendation to add a new point to include explicit protection for ancient woodland and veteran trees: <ul style="list-style-type: none"> • 'f) Development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.' • Where development sites are adjacent to ancient woodland, a precautionary principle of minimum 50-metre buffer should be maintained including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance. Justification: <ul style="list-style-type: none"> • Ancient woods are reservoirs of biodiversity that are highly fragmented and irreplaceable. They are our richest terrestrial wildlife habitats, with complex, unique and vulnerable ecological communities developed over centuries. • The National Planning Policy Framework (NPPF) (paragraph 175c) states: "When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". • There is no appropriate mitigation for the loss of irreplaceable habitats. Direct impacts that would lead to damage or loss of ancient woodland habitat or veteran trees must either be avoided or compensated for if the need is truly exceptional. 	There is no ancient woodland in the borough, but the borough does contain a number of veteran trees. The council considers that trees and woodlands are vital components of the borough's landscape and green infrastructure. However, as noted, paragraph 175(c) of the NPPF already states that development resulting in the loss or deterioration of ancient woodland and ancient or veteran trees should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. The council considers that national policy affords enough protection of such trees and that this does not need to be repeated in the local plan.	No Change.

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6.6 Green Infrastructure	BGI2	Mary Duffy	Not planting enough trees and cutting down healthy mature trees receiving widespread protest from residents. Lack of common sense where contractors see trees as an expense	<p>The Council recognises the importance of trees and woodlands within the borough, and local plan policies seek to ensure that existing trees are protected, retained or replaced on proposed development sites, and if not possible, for a financial contribution to be made for off-site provision. The Mayor's Greener City Fund continues to plant trees in the borough and the council will continue to support Community Tree Planting Grants through NCIL (Neighbourhood Community Infrastructure Levy) and S106 contributions and the supporting text of BGI2 notes that wherever possible, opportunities to increase the borough's tree population will be taken.</p> <p>Policies in relation to Council's wider the management (cutting down, pruning etc.) of existing trees are not a material planning consideration matter for the Local Plan. Information on Brent's tree management strategy can be found here: https://www.brent.gov.uk/services-for-residents/environment/trees-hedges-and-grass-maintenance/</p>	No Change.
6.6 Green Infrastructure	Blank Green Infrastructure	Thersa	Green infrastructure: The environment, and education about it should be our top priority, and should be at the heart of every Council undertaking. Suggestions include community gardens and allotments. All public spaces should have posters encouraging people to become greener and advocating less consumption. All public spaces should use green energy and avoid waste, including the removal of flat screen displays at the Council run facilities.	Green infrastructure: Agreed the Plan supports community gardens and allotments and in association with policies in the London Plan will deliver more and higher quality green infrastructure in new development.	No Change.

6.7 SUSTAINABLE INFRASTRUCTURE

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	BSI1	Andrea Diez	Regeneration will be great in Willesden Green, Queens Park, Brondesbury Park, South Kilburn, Stonebridge Park and Kensal Green.	Support welcomed.	No Change.
6.7 Sustainable Infrastructure	BSI1	Theatres Trust	We are pleased to see the change of wording from 'viable' to 'no longer required'	Support welcomed.	No Change.
6.7 Sustainable Infrastructure	BSUI1	Department for Education	Concerned over requirement for BREEAM excellent as we wish to maximise value for money, making efficient use of public funds and question whether it is justified to expect schools to achieve excellent as opposed to very good. The delivery of schools should not be burdened by challenging obligations, particularly with regards to expansions as existing buildings may be difficult to retrofit to meet standards. Therefore the policy should be made flexible in respect to schools and community buildings, especially with regards to expansion.	<p>It is considered that the need for non-residential institutions - including schools and community buildings - to achieve a BREEAM standard of "Excellent" is justified and that it is not appropriate to reduce the standard. London Plan policy SI2 requires that major development should be net zero-carbon towards the aim of London becoming a zero-carbon city, and this will be extended to include major non-residential developments on final publication of the London Plan. At a local level it is anticipated that climate change will have a significant impact on Brent without the implementation of mitigation and adaptation measures, and obligations such as the requirement for buildings, including schools, to achieve BREEAM standard of "Excellent" is necessary to ensure that net zero-carbon can be achieved. In addition it should be used in a positive way to highlight to children the issue of sustainable development and resource management.</p> <p>Furthermore, this is considered to be a short-term outlook rather than concerning the whole life-cycle of the property including on-going running costs, or potential future improvements which may be required to bring the property up to even higher environmental standards (if introduced in future). The council also considers that particularly if it is considered at the outset of a project, such projects can be achieved without adding substantial additional cost. If costs are prohibitive then the Council may agree a lower standard if specific priority measures can be achieved taking account of the site's characteristics.</p>	No Change.
6.7 Sustainable Infrastructure	BSUI1	Environment Agency	Pleased to see the policy.	Support welcomed.	No Change.
6.7 Sustainable Infrastructure	BSUI1	Natural England	Pleased to see the policy. If creating a Green Infrastructure Strategy for the borough, consider climate change. Natural England will be publishing a 2nd edition of its Climate Change Adaptation Manual which will include a Landscape Scale Climate Change Assessment Tool. This tool can be used to identify natural assets (e.g. different habitats and species) in the borough and identify adaptation responses that can be incorporated into a plan to create a resilient landscape across the borough.	Support welcomed.	No Change.

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6.7 Sustainable Infrastructure	BSUI1	St. George	<p>Policy is not sufficiently flexible, not justified, effective, or consistent with national policy.</p> <p>Proposed modification: Within Growth Areas, all major developments shall connect to or contribute towards a decentralised energy system unless it can be demonstrated that such provision is not feasible, or the proposed heating system is 100% renewable.</p> <p>Reasoning: The policy wording is ambiguous and implies all major development, including those outside the Growth Areas, will be required to connect and contribute to a decentralised energy system.</p> <p>Evidence base: It is important that the approach of the Regulation 19 Local Plan allows enough flexibility to respond to the objectively assessed needs of Brent, and its population</p>	<p>It is correct that the policy does suggest that all major developments - including those outside of growth areas - should connect to or contribute towards a decentralised energy system. However, the policy also allows flexibility in acknowledging that such connections or contributions may not be feasible in some circumstances, or if the proposed heating system is not 100% renewable. It is therefore considered that the policy wording is not ambiguous, and allows for flexibility in circumstances where a decentralised energy system may not be practical.</p> <p>The policy is considered to be justified in order to reach zero-carbon and to help create a resilient and efficient Brent, and is considered to be effective in ensuring that opportunities to increase efficiency are taken advantage of while recognising that there may be no suitable opportunities in certain circumstances. Finally, the policy is consistent with national policy in that it plans effectively for climate change.</p> <p>The Council considers that the strategy set out in the Local Plan for growth, new homes, employment, facilities and infrastructure does so in a way that meets the area's objectively assessed needs while allowing for flexibility in certain circumstances.</p>	No Change.
6.7 Sustainable Infrastructure	BSUI1	Quintain	<p>Maintain objection to Policy BSUI1 as these matters are covered in more detail in either the site specific allocations for the Growth Areas or the London Plan and therefore do not need to be repeated.</p> <p>The policy should therefore be deleted.</p>	<p>It is not considered that matters contained within BSUI1 are covered entirely within the site specific allocations, as the Local Plan should provide guidance for windfall sites which may come forward outside of the site specific allocations. Additionally, while London Plan policy SI 2 outlines the requirement for major development to be zero carbon and suggests how this can be achieved via the energy hierarchy, and while SI 3 states that development plans should identify suitable sites for energy infrastructure, SI 3 also requires development plans to identify need for such energy infrastructure requirements. In response to this, BSUI1 identifies a need for all major developments to connect to or contribute towards a decentralised energy system and to submit a Sustainability Statement. It is therefore considered that local plan policy BSUI1 is necessary, as it outlines Brent's approach to energy infrastructure requirements at a local level which would not be able to be achieved by falling back entirely on London Plan policy.</p>	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.7 Sustainable Infrastructure	BSUI1- BSUI2	Robin Sharp	<p>The Local Plan needs more emphasis on ‘action’ to meet the Climate Emergency and the Air Quality challenges in London. Actions to reduce road journeys by individual private cars where daily commuting is involved and public transport alternatives are available.</p> <p>Reference to recent reports on air quality in Brent:</p> <p>1) Study 1: The first is ‘Getting Ready for the Extended ULEZ 2021: Imperial College/Clean Air for Brent 2019. Section 3.4’. (for detail refer to original comment) This shows in Figure 16 in section 3.4 that Transport for London predict that the ULEZ 2021 will reduce air pollution in Brent by NO2 by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular. The credibility of these predictions is reinforced by the monitoring results from the first 6 months of the Central London ULEZ, which has been very successful.</p> <p>2) Study 2: The second report is Brent Breathes: the Report of the Air Quality Scrutiny Inquiry 2019 available on the Brent website.</p> <p>3) Brent is vulnerable to through commuting traffic – see A Study of Air Quality in Brent: Imperial College/Clean Air for Brent 2018, section 3.8. Shows in peak hour, 55% of traffic on A404 in Harlesden and 64% traffic in Chamberlayne Road had its origin and destination outside Brent.</p> <p>4) The ULEZ 2021 extension is predicted to reduce commuting through Brent by non-compliant diesel and petrol cars significantly. However, the population growth of 60,000 will negate this beneficial effect.</p> <p>Recommended change in 3.32: Add reflection of study (1) to replace ‘Its use as the boundary of the extended Ultra-Low Emissions Zone to be introduced in 2021 is unclear in terms potential changes on these adverse impacts.’</p>	<p>There is significant reference to the issue of Air Quality in the Local Plan, with a specific policy on air quality standards associated with major developments within the borough (Policy SUI2 Air Quality), whilst smaller developments will be subject to London Plan Policy SI 1 Improving Air Quality. The Council's overall plan is to reduce reliance on the private car and this is reflected in policies around locations of development, promotion of car free developments and parking standards, whilst promoting Healthy Streets design principles and also supporting projects such as the West London Orbital. Policies within the London Plan related to sustainability within developments with a move away from gas and other carbon powered combined heat and power systems to those in which local emissions will no longer be generated. Whilst the issue is clearly important, it is considered that in terms of planning impacts, the Local Plan together with the London Plan provides an effective mechanism to assist in improving air quality within Brent and its adjoining neighbours.</p>	<p>Paragraph 3.32 amend: “...Its <u>will be used</u> as the boundary of the extended Ultra-Low Emissions Zone to be introduced in 2021_ is unclear in terms potential changes on these adverse impacts. <u>Transport for London predict that the ULEZ 2021 will reduce air pollution in Brent by NO2 by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular.</u></p>

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6.7 Sustainable Infrastructure	BSUI2	Clean Air London	<p>CAL asks you please to take account of the following strong evidence and excellent work done by others:</p> <ol style="list-style-type: none"> 1. Brent Breathes: Report of the Resources and Public Realm Scrutiny Committee: Air Quality Scrutiny Inquiry (December 2019). 2. The Knightsbridge Neighbourhood Forum (which I chair): https://www.knightsbridgeforum.org https://www.knightsbridgeforum.org/media//documents/knp_made_version_december_2018_131218_website.pdf https://www.knightsbridgeforum.org/planning/best-practice-guidance/ (e.g. see the construction guidance) 3. Please identify all significant sources of fossil fuels (eg CHP plants) and produce a plan to abate their emissions and eliminate those units. We need action on wood burning and warnings of air pollution episodes. 4. Clean Air in London's submissions to the London Plan EiP (two attached). 5. Key messages from UN Environment's sixth Global Environment Outlook (where I was the air pollution stakeholder on the Steering Group) (attached). 6. The City of London's Air Quality Strategy 2019 – 2024 which includes 65 practical measures. https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/City-of-London-Air-Quality-Strategy-2019-2024.pdf 7. Push for zero air emissions https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/#key-findings <p>Please also keep and build upon the Air Quality Positive approach whether or not the London Plan includes it.</p>	<p>Noted. The Plan seeks to ensure that walking and cycling are prioritised as modes of transport and reduce the need to travel. Planning policy can only apply where developments need planning permission and the policy is reasonably related to the development that is being proposed. Whilst energy sources for developments will soon move away from carbon reliant sources within large developments, planning will for example not be able to stop occupants of dwellings installing wood-burning stoves if planning permission is not required, and the acceptability of the emissions is considered acceptable under other legislation. This is a matter that will have to be addressed through national legislation related to air quality in urban areas/ clean air zones. The Council is working on an air quality strategy which will pull together all its actions into a consolidated approach to improving air quality in the borough.</p>	No Change.
6.7 Sustainable Infrastructure	BSUI3	Mary Duffy	<p>Flooding is prevalent at the bottom of Blackbird Hill, especially in basements on Braemar Avenue alongside the canal and coombe road as these areas are within the River Brent floodplain. No developments should be built in a floodplain.</p>	<p>The Council is not promoting new development on greenfield floodplain. Where it is allocating previously developed sites within the floodplain, these will be subject to a sequential test and there will be an opportunity to reduce the impact of flooding on and off-site through appropriate design and attenuation measures compared to the impacts of their existing development.</p>	No Change.

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6.7 Sustainable Infrastructure	BSUI3	Environment Agency	<p>We support the policy and agree with points a) - e), however we have concerns sufficient to find Policy BSUI3 Managing Flood Risk unsound for the following reasons:</p> <p>Reason 1</p> <p>Policy BSUI3 states: "Proposals requiring a Flood Risk Assessment..."</p> <p>It is unclear what these proposal are and when a Flood Risk Assessment (FRA) will be required. It is presumed this is in line with the National Planning Policy Framework (paragraph 163, footnote 50), however this should be clarified within the policy, to ensure compliance with national policy.</p> <p>Recommended changes:</p> <ul style="list-style-type: none"> • It should be clarified within the policy what developments will require an FRA to ensure compliance with national policy. 	Reason 1: Paragraph 6.7.37, under "Information in support of planning applications", outlines where a FRA is required.	<p>After paragraph 6.7.35 amend: "<u>6.7.35a In exceptional circumstances and consistent with national policy outputs there may be occasions where development in the functional floodplain is required. For the most part this is likely to be only for water compatible uses. Nevertheless, due to development that has occurred in Brent in what would otherwise have been functional floodplain, there may be exceptional circumstances where it is appropriate for small incursions into the functional floodplain to be considered acceptable in principle if it has other significant benefits in relation to watercourse environment or risk of flooding. Examples could be returning a larger area to functional floodplain, or reducing the likelihood of impediments to river flow that might currently exist, such as stilts holding up buildings over a watercourse. Where any intervention that is defined as development in the functional floodplain occurs, the council will also seek the opportunity to improve through that development the environmental quality of the watercourse.</u>"</p> <p>Reason 3: Policy BSUI3 amend: "<u>....surface water flooding. Proposed development must pass the sequential and exceptions test as required by national policy. The design and layout.....</u>"</p> <p>Paragraph 6.7.5 amend: "<u>....as well as devastating environmental impacts. Brent is susceptible to flooding from different sources. Fortunately, over the last twenty years, Brent has not experienced major flooding from its brooks and rivers, with the most recent events....</u>"</p>

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6.7 Sustainable Infrastructure	BSUI3	Environment Agency	<p>Reason 2</p> <p>The policy also states: “Opportunities will be sought from the redevelopment of sites in functional floodplain (flood zone 3b) to restore the natural function and storage capacity of the floodplain.”</p> <p>It is unclear from the local plan and associated documents what is considered as developed functional floodplain and would therefore be considered suitable for ‘redevelopment’. It is unclear what types of developments may be suitable for such sites, if undeveloped functional floodplain will not be considered, when the policy will be applied, what criteria must be met and whether this may contradict national policy, in terms of compatibility and the sequential approach. Without clarity on these points, we consider this policy is not effective, unclear on its deliverability and confusing for developers and site owners. Please note that only water compatible uses and essential infrastructure are compatible with flood zone 3b.</p> <p>Changes: • The deficiencies highlighted above should be addressed and included within Policy BSUI3 to provide additional clarification on the redevelopment of sites within the functional floodplain.</p>	<p>Reason 2: Brent is a heavily developed borough and much of what would have previously been functional floodplain is already developed, so technically removed from functional floodplain. In addition existing functional floodplain can include structures, etc which might be water-compatible uses. Consistent with national policy it is anticipated that the type of redevelopment which would be suitable for such sites would be essential infrastructure, re-development of already water compatible uses and dealing with structural elements of existing drainage channels, e.g. culverts. Improvements could be made to those already compatible uses in order to restore the natural function and storage capacity of the floodplain. In addition for some development that might currently displace what would otherwise be functional floodplain, there might be opportunities with some minor incursions into existing functional floodplain to increase functional floodplain overall, or reduce the risk of flooding through for example reducing the likelihood of blockages to efficient flow in times of flood. A good recent example of this is the Argenta House redevelopment which proposed some development in the existing functional floodplain, but was able to rationalise other structures and return some of the site to functional floodplain, plus create biodiversity improvements by changing what was a heavily engineered/ unsympathetic channel. The council is not seeking to promote development of non-compatible uses in flood zone 3b to undermine, merely identifying that in heavily built up locations on what might have previously been functional floodplain, incursions might be desirable in existing functional floodplain that have a net overall benefit, either to reduce floodrisk or enhance the environmental quality of the floodplain/watercourse or both. Any applications for development meeting the requirements of paragraph 6.7.37 would be assessed in accordance with national policy, the sequential and exceptions test and local plan policy BSUI3. Together these policies would ensure that predominantly only water-compatible development takes place within the functional floodplain, but it also recognises that other interventions might be appropriate. An explanation in the policy justification can reduce confusion.</p>	<p>After paragraph 6.7.35 amend: "<u>6.7.35a</u> <u>In exceptional circumstances and consistent with national policy outputs there may be occasions where development in the functional floodplain is required. For the most part this is likely to be only for water compatible uses. Nevertheless, due to development that has occurred in Brent in what would otherwise have been functional floodplain, there may be exceptional circumstances where it is appropriate for small incursions into the functional floodplain to be considered acceptable in principle if it has other significant benefits in relation to watercourse environment or risk of flooding. Examples could be returning a larger area to functional floodplain, or reducing the likelihood of impediments to river flow that might currently exist, such as stilts holding up buildings over a watercourse. Where any intervention that is defined as development in the functional floodplain occurs, the council will also seek the opportunity to improve through that development the environmental quality of the watercourse.</u>"</p>

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6.7 Sustainable Infrastructure	BSUI3	Environment Agency	Reason 3 Paragraph 157 of the NPPF states the requirement for a sequential risk-based approach to the location of development, and application of the sequential test to steer development towards areas at the lowest risk of flooding. For Policy BSUI3 to be compliant, it must reference the requirement for development sites to pass the sequential and exception tests as set out in PPG and that development should not be allocated or permitted if there are reasonably available sites at a lower risk of flooding. Changes: • Policy BSUI3 should be amended to reference the requirement for development sites to pass the sequential and exception tests and that development should not be allocated or permitted if there are reasonably available sites at a lower risk of flooding.	Reason 3: Noted. See proposed change to policy. From this it follows that development will not be permitted if there are reasonably available sites in areas of lower flood risk.	Reason 3: Policy BSUI3 amend: "....surface water flooding. <u>Proposed development must pass the sequential and exceptions test as required by national policy.</u> The design and layout....."
6.7 Sustainable Infrastructure	BSUI3	Environment Agency	Accuracy Point: Paragraph 6.7.5 & 6.7.7: This paragraph states, that there has been no major flooding in the borough in the last 20 years, however paragraph then 6.7.7 states there have been multiple instances of sewer flooding over the last 5 years. These statements appear to be contradictory, and we recommend that 6.7.5 is revised to make it clear that the borough is susceptible to flooding from different sources, but has not experienced any major flooding from rivers in the last 20 years.	See proposed change.	Paragraph 6.7.5 amend: "....as well as devastating environmental impacts. <u>Brent is susceptible to flooding from different sources.</u> Fortunately, over the last twenty years, Brent has not experienced major flooding from its brooks and rivers, with the most recent events...."
6.7 Sustainable Infrastructure	BSUI4	Environment Agency	We support this policy around management of surface water and water resources. We support the inclusion of water consumption targets, the target of greenfield runoff rates for surface water, which is consistent with the relevant London Plan policies, and the requirement for a drainage strategy for all development that may impact on the current drainage regime. This is further backed up by paragraphs 6.7.40, 6.7.41 and 6.7.42.	Support welcomed.	No Change.

6.8 TRANSPORT

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6.8 Transport	BCSA7	John Cox	Wembley Park Station: Crossrail protected the Dudding Hill Line and projected flyover across the Chiltern Main Line to the Chiltern Aylesbury Branch at the Neasden Stations Growth Area site in the 1990's. The Chiltern Aylesbury Branch will soon be reopening the Oxford-Cambridge extension, and eventually Silicon Fen. The Plan should continue to protect this function for outline within the Neasden Stations Masterplan. Funding for the masterplan has been increased by a bid to the London Strategic Investment Pot, making £960,000 available for the WLO boroughs. The plans of the 90s provide an alternative route to Old Oak Common and Crossrail from Buckinghamshire. This must be considered as an alternative route, considering connection with the Northwick Park chord at Willesden Junction Low-Level Station. Both routes wouldn't be required but capacity should be provided in the Neasden masterplan. This alternative would be faster but perhaps more expensive. It should be mentioned in the Plan. Any such project would likely add new platforms on the Chiltern Aylesbury Branch at Wembley Park Station, benefitting the area. It would also provide a choice for Aylesbury passengers among others, between Marylebone and a new, easy interchange with Crossrail to central London via the Dudding Hill Line at the Old Oak Common Lane Station. For this possibility I object to BCSA7. London Underground own the land and should not be able to develop until the required strip of land on its eastern edge is protected. This will then align with the protection of operational railway land outlined within the DNLP.	<p>The protection of land to enable a projected flyover across the Chiltern Mainline to the Chiltern Aylesbury Branch at the Neasden Stations Growth Area site is not considered appropriate given that there is no credible plan for its delivery. It has the potential to cause significant uncertainty and sterilise land that could otherwise be used productively.</p> <p>The potential for new platforms at Wembley Park Station appears to exist within the boundaries of the existing operational rail land. Nevertheless, the issue of not compromising future delivery through consideration of this potential has been raised with TfL in relation to pre-application discussions on the southern site. As such incorporation of this issue within policy BCSA7 is considered appropriate.</p>	Policy BCSA7 planning considerations amend: " <u>The development should not compromise the ability to add potential platforms at Wembley Park station on the Chiltern Line Aylesbury Branch.</u> "
6.8 Transport	BCSA7	John Cox	In addition, the PLACE in chapter 5.5 is missing.	Add reference to "Place" on the South chapter heading	Chapter heading amend: "5.5 SOUTH PLACE"
6.8 Transport	BCSA7	John Cox	Oppose. Sidings owned by TFL who should not be allowed to develop this operational railway land as it is protected for possible future passenger use in the DNLP. I personally supported the Mayor's position on this at DNLP EiP. Protection of this land is not dependant on allocating specific uses. The site would however be a suitable site for maintenance and stabling depot for a future North London Tram system. The land is publicly owned and should remain this way, not being sold off for short term gain.	Whilst the sentiment of the representation is understood, there is no formal proposal for a North London Tram system. It is not identified as even a longer term proposal within the London Plan. Consistent with national policy it is not considered appropriate for the Council to seek the retention of this site for transport purposes when the site has been promoted by its owner for development, where there is no reasonable prospect of it being identified for an alternative transport use over the lifetime of the Plan.	No Change.
6.8 Transport	BD3	Mary Duffy	The WLO should not be used to justify tall building development.	The WLO will improve public transport accessibility, this supports but is not solely the reason that areas are identified for tall buildings. The areas considered appropriate for tall buildings in any case for the most part either have, or will have better levels of public transport which make them an appropriate place for higher density development, this will be the case even if the WLO is not delivered.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	Para 6-8-6- figure 37-	OPDC	The text should reflect the status of the West London Orbital line project.	Agreed reference should be made to the future work on station locations and connectivity.	Paragraph 6.8.6 amend: "...A pedestrian route over the A5 is needed to connect Brent Cross West station to Staples Corner. <u>The precise location of the WLO stations will be firmed up as the project progresses. When there is more certainty on their location more detailed work can be done on improving their connectivity to surrounding areas. TO the south.....</u> "
6.8 Transport	BT1	TfL Spatial Planning	Reference to London Plan standards is necessary to ensure that quantitative as well as qualitative standards are met. Policy BT1c) required change: "cycle parking in line with or exceeding London Plan standards and TfL and Westrans design standards."	Changes suggested are considered appropriate.	BT2 amend "c)....in line with or exceeding <u>London Plan standards</u> and TfL and WestTrans design standards..."
6.8 Transport	BT1	TfL Spatial Planning	The text in paragraph 6.8.16 needs to be corrected to refer to cycle parking standards in London Plan policy T5 (not T6)'	Changes suggested are considered appropriate.	Paragraph 6.8.16 amend: "...cycle parking are set out in London Plan policy T6 T5."
6.8 Transport	Figure 38	OPDC	More extensive cycle routes are shown in OPDC's Local Plan.	Figure 38 is from the Brent Cycle Strategy. The figure should remain consistent with extant Brent evidence to allow for cross-reference, but can clearly show the OPDC boundary.	Figure 38 amend: Colourwash the OPDC area and include on the key.
6.8 Transport	Figure 38	John Cox	The only map showing railway lines is, ironically, where they don't matter, in Figure 38: "Existing and Proposed Cycling Routes" on page 371. That map is poor quality, maybe a reused JPG file. Replace it with a sharpened, loss-free image.	Noted. See proposed changes.	Include high resolution version of figure 38.
6.8 Transport	BT1-BT4	TfL Commercial Development	Strongly support the principles advocated in Policy BT1 and prioritising sustainable / active travel over private motor vehicles. TfL CD supports the aim of achieving a modal shift with 80% of trips across London being made by public transport by 2041, as advocated in the Mayor's Transport Strategy, and welcomes Brent's alignment with draft London Plan policy regarding residential parking provision. Also support the criteria for determining the suitability of development with regard to the impact of proposed parking outlined in BT2.	Support welcomed.	No Change.
6.8 Transport	BT2	GLA	Support the parking ratio for B1(a) uses but the ratios for B1(c), B2 and B8 are too generous. B1 uses should follow Table 10.4 of the draft London Plan and B2 and B8 should be determined on their own merits.	Agreed that the table can be amended so London Plan standards apply to all B1.	8.4.1 Amend: "Parking standards for B1a uses <u>in outer London</u> as set out in the London Plan policy T6.2 apply <u>to all B1 uses in Brent. For office development south of the Dudding Hill Line Inner London standards will apply.</u> "

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	BT2	St. George	Object as: not sufficiently flexible, not consistent with national policy. Proposed modifications: “...Controlled Parking Zone (CPZ) is in place. or can be achieved. ” Reasoning: Ambiguous policy, which should be clear on the locations or criteria where CPZ can be achieved.	Noted. The absence of a Controlled Parking Zone should not preclude car free development in suitable areas. Policies surrounding car free development are fairly new, and are pivotal instruments for the Mayor in meeting his targets. The adoption of CPZ's is therefore yet to be comprehensive and currently is implemented only with the support of neighbourhoods that it will cover. In some cases, this is likely to require parking stress to be achieved which means that residents are more likely to eventually support a zone. The Council will focus on whether the tools are available to support a CPZ being achieved, e.g. sufficient funds in place to administer its delivery, than necessarily focussing on when it can be achieved. As such the policy is considered appropriate as it is encouraging, rather than requiring car free development.	No Change.
6.8 Transport	BT2	Wembley Towers Limited	Car free development is only encouraged where an existing Controlled Parking Zone (CPZ) is in place or can be achieved. This is unnecessarily inflexible. The opportunity to deliver a CPZ is with the Council and not the developer. The opportunity to promote car free or limited ('car-lite') parking development in a PTAL 4 area without an existing CPZ should reasonably be supported subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment. To ensure soundness and compliance with national policy to optimise the density of development in city and town centres and other locations that are well served by public transport, after BT2's first paragraph inset: “In appropriate locations benefiting from high levels of public transport access generally with PTAL 4 or above in areas outside an existing Controlled Parking Zone (CPZ), opportunities for car free development should be encouraged in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment”.	Noted. The impact of car free developments needs to be considered on the surrounding road and parking infrastructure. Without a CPZ in place, car free development has the potential to place additional pressure on these infrastructures in nearby locations. This could be a significant concern where parking stress exists. Car free development needs to be truly car free, and not just parking free. To ensure this is possible, realistically an appropriate CPZ needs to be in place, or achievable to discourage car ownership/ use. It is likely that a CPZ will be achievable in most locations and the Council will support developments where a developer makes reasonable endeavours to ensure its delivery, e.g. through a contribution towards a CPZ.	No Change.
6.8 Transport	BT2	Stonebridge Real Estate Development	Car free development is only encouraged where an existing Controlled Parking Zone (CPZ) is in place or can be achieved. This is unnecessarily inflexible. The opportunity to deliver a CPZ is with the Council and not the developer. The opportunity to promote car free or limited ('car-lite') parking development in a PTAL 4 area without an existing CPZ should reasonably be supported subject to local conditions and the relevant consideration of a Travel Plan and Transport Assessment. To ensure soundness and compliance with national policy to optimise the density of development in city and town centres and other locations that are well served by public transport, after BT2's first paragraph inset: “In appropriate locations benefiting from high levels of public transport access generally with PTAL 4 or above in areas outside an existing Controlled Parking Zone (CPZ), opportunities for car free development should be encouraged in the context of local conditions and subject to relevant justification through the submission of a Travel Plan and Transport Assessment”.	Noted. The impact of car free developments needs to be considered on the surrounding road and parking infrastructure. Without a CPZ in place, car free development has the potential to place additional pressure on these infrastructures in nearby locations. This could be a significant concern where parking stress exists. Car free development needs to be truly car free, and not just parking free. To ensure this is possible, realistically an appropriate CPZ needs to be in place, or achievable to discourage car ownership/ use. It is likely that a CPZ will be achievable in most locations and the Council will support developments where a developer makes reasonable endeavours to ensure its delivery, e.g. through a contribution towards a CPZ.	No Change.

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6.8 Transport	BT2- Appendix 4	TFL Spatial Planning	Welcome that B1a (office) is in line with the London Plan. However, the employee to floorspace ratio for B1b (research and development) and B1c (light industrial) are over 4X higher than B1a (office), meaning industrial uses in B1c, B2 and B8 use classes would be permitted a higher parking ratio per sqm of floorspace despite having lower numbers of employees per sqm. The parking policy should refer to the standards in Table 10.4 of the draft London Plan for all B1 uses.	Agreed that the table can be amended so London Plan standards apply to all B1.	8.4.1 Amend: "Parking standards for B1a uses in <u>outer London</u> as set out in the London Plan policy T6.2 apply to <u>all B1 uses in Brent</u> . For <u>office development south of the Dudding Hill Line Inner London standards will apply</u> "
6.8 Transport	BT2- Appendix 4	TFL Spatial Planning	Supportive of broad approach to parking and car free development where in line with London Plan parking policies. Some concerns about the other employment uses approach, which allows higher parking provision. As with the draft London Plan every opportunity to reduce the proportion of these trips made by car – both through a development's location and design and through parking restraint – should be taken.	Noted. Brent's employment areas have variable access to public transport. To reflect this, the parking standards for employment uses are lesser in areas of high PTAL. To retain general viability and function, it is seen as appropriate to allow for a certain amount of parking. Paragraph 8.4.2 notes that the Council will support developments proposing standards below what has been outlined in table 1. This is in line with London Plan policy T6, H as it states a maximum standard as opposed to a minimum requirement.	No change
6.8 Transport	BT3	OPDC	Support should be given to freight consolidation	This is fair to reduce unnecessary vehicle movements and as such the text shall be amended.	Policy BT3 amend: "Development that would generate significant movement of goods or materials, both during construction and in operation, should minimise the movement of goods and materials by road. <u>Freight consolidation through maximising the use of the capacity of vehicles entering and exiting a site and the use of more sustainable alternatives, i.e. by rail and canal, is encouraged.</u> "

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6.8 Transport	BT3	Aggregate Industries UK Ltd	<p>Aggregates Industrials UK depot at Wembley is long established and meets a vital need for the sustainable import of aggregate, asphalt, and ready mixed concrete into London and should therefore be safeguarded. The NPPF states that existing, planned and potential sites for the bulk transport, handling and processing of minerals, concrete and aggregates should be safeguarded. In addition, NPPF states that planning policies should ensure new development can be integrated with existing facilities, and that they should not have unreasonable restrictions placed on them as a result of development permitted after they were established. DNL policy Si10 states that development plans should ensure sufficient capacity of aggregate rail depots is available and where practicable expand capacity adjacent to rail depots adjacent to major construction projects.</p> <p>3. New policy BT3a to specifically safeguard bulk transport, handling and processing facilities as required by the NPPF and London Plan, as follows:</p> <p>Existing bulk mineral transport, handling and processing facilities and facilities for the manufacture of concrete and concrete products will be safeguarded and development proposals which would conflict with the effective operation of these facilities will not be permitted unless:</p> <ul style="list-style-type: none"> • The development proposals can provide appropriate mitigation to ensure that they will not place unreasonable restrictions on the effective operation of these facilities; or • The existing facility can be satisfactorily relocated within the development proposals in terms of operational requirements and environmental criteria; or • The facility is replaced in an appropriate alternative location. 	<p>It is accepted that the Plan could provide more of a positive framework to ensure the retention of existing rail freight sites. As such it is proposed that policy BT3 is amended to incorporate appropriate reference to existing facilities.</p>	<p>Policy BT3 amend: "<u>Existing sidings and sites adjacent to them or the canal with the potential for rail freight use will be protected where these are adaptable to serve anticipated needs. Development proposals which would conflict with the effective operation of these facilities will not be permitted unless:</u></p> <p><u>a) appropriate mitigation is provided to ensure it will not place unreasonable restrictions on the effective operation of these facilities; or</u></p> <p><u>The existing facility can be satisfactorily relocated within the development proposals in terms of operational requirements and environmental criteria; or</u></p> <p><u>The facility is replaced in an appropriate alternative location.</u>"</p>
6.8 Transport	Blank Transport	John Cox	<p>The inner-most OSTC in Brent is the North London Line. Moving out the next OSTC is the Dudding Hill Line or potential West London Orbital (WLO). It also connects end-on with what might be called 'OSTCs' in Hounslow and Ealing, and a few metres on the eastern side of the A5 Edgware Road in Barnet. There should be a third OSTC. It is A4006 Kenton Road, along the border with Harrow, continuing as the A4006 Kingsbury Road eastwards to the A5 Edgware Road. This could link Harrow and Colindale town centres and destinations between (including all public transport links). This would be consistent with achieving sustainable development and modal shift away from the private car. No other obvious route for an OSTC across outer north-west London exists. Potential passenger densities are probably high enough for fixed-infrastructure intervention. There should be a detailed study involving adjoining boroughs, similar to the process for the WLO and that for the 'Sutton Link' in south-west London. Its inclusion in the Brent Local Plan in short narrative form would be sound. Fixed infrastructure could be on-road and segregated tram tracks. It is potentially wide enough for segregated cycle lanes along its whole length. Whilst delivery of the project may be some time off,</p>	<p>Noted. The potential of OTC 3 route is understood, notwithstanding that currently it has not been formally considered/ has no status as a transportation project. Significant elements of this route are identified as intensification corridors and much of the highway along the route is generous in width. At this stage, it is considered that the existing highway boundary is sufficiently wide to be able to accommodate future use for non-private vehicles. The Council working with the West London Alliance is considering future strategic infrastructure needs and the Council can raise consideration of this project as part of that process.</p>	<p>No Change.</p>

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			identification in the Local Plan will raise its profile and ensure the potential corridor is not compromised by short term planning.		
6.8 Transport	Blank Transport	Highways England	Highways England are mindful of the planning decisions effects on Strategic Road Network operations and associated junctions. The Agency and SRN cannot be expected to cater for unconstrained traffic growth generated by new developments. Policies and proposals incorporating measures to reduce traffic generation at source and encourage more sustainable travel behaviour are supported. Highways England are pleased to see reference to them within the Local Plan and clarity that they will be consulted on any development that may have an impact on the M1. A Strategic Transport Assessment in accordance with Circular 02/2013 should provide an indication of the residual impacts of the high level of development proposed over the Plan period on the SRN prior to submission. It should cover an appropriate area; possibly beyond the borough boundary. It should also set out various intermediate dates to identify any tipping points when action will be required, plus what measures may be required to mitigate these impacts. Until this has been submitted, Highways England are not in a position to offer any detailed comments.	Noted. As acknowledged by Highways England, the Local Plan seeks to increase the modal share of more sustainable transport modes, encouraging development in areas with good public transport, whilst also reducing car dependency. This is also supported by policies within the new London Plan. Sustainable modes will be supported through policy BT1, whilst BT2 sets stringent parking standards, and seeks to prioritise the delivery of car free development in appropriate areas. The Plan identifies significant areas of the borough for redevelopment. These areas will come forward with significantly less parking than is currently present. This is particularly true for example in Staples Corner which is identified as an area for intensification/co-location. Intensification of floorspace is likely to reduce the use of private vehicles at peak times in the area significantly as space allocated to private parking will reduce to meet floorspace needs. In terms of the need for a Strategic Transport Assessment the Council has sought further dialogue with Highways England, on its necessity and scope, for example its inclusion of development in Barnet, which has significantly more development planned in areas with poorer public transport accessibility than Brent and therefore likely to be more vehicle dependent. It is awaiting Highways England's response. Large sites which will significantly inflate local populations are generally likely to be subject to a masterplan approach. This will allow the Council to reduce the impact on the road network as much as possible through a holistic approach to those areas. The Mayor's Strategic Transport Modelling Report models the impact of projected population increase on the road network. It concluded that overall private vehicle use would reduce from 9.72 million trips per day in 2015 to 6.6 million trips per day in 2041, which gives the potential for significant reductions in impacts on the strategic road network and as such should free up capacity so that additional capacity investment is not required.	No Change.

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6.8 Transport	Blank Transport	John Cox	<p>(3) Willesden Junction station: This is now within the planning boundary of the OPDC. However, there should be passive provision within other parts of Brent for certain related matters. Network Rail (NR) is considering a major redevelopment at Willesden Junction (with at least four 30-storey commercial or housing blocks, for instance). This would allow wholesale rebuilding of the station. Harlesden Neighbourhood Forum, and I have met them at a senior level and expect receipt of further analysis of Willesden Junction concurrently when it is presented to the OPDC board. NR has agreed to consider providing passive provision for four Low-Level through-platforms at Willesden Junction, four High-Level through-platforms with a ticket office directly on the A404 Harlesden High Street, and additional West Coast Main Line and Milton Keynes-Croydon train platforms. Extra platforms provide positively-prepared soundness, if there develops a booming OPDC development area over the next two or three decades. One possibility for greater capacity and connectivity in such a golden future is to extend some or all Barking-Gospel trains to terminate at Willesden Junction High-Level. Another possibility is to extend some East London Line trains from Highbury & Islington though to Willesden Junction Low Level via Primrose Hill and Queens Park. The third possibility, crucially requiring a Local Plan change, is to passively provide for a new chord at Northwick Park, to allow Chiltern Aylesbury Branch trains via Harrow-on-the-Hill to run through Wembley Central and terminate at Willesden Junction Low Level. This needs mention the “5.4: NORTH WEST” Place narrative if you wish that section to be sound and positively prepared, providing Buckinghamshire passengers with a direct route to Old Oak Common and also an imperfect interchange with Crossrail, including to Heathrow airport. This would drop down from the east of Northwick Park station (there are currently no platforms on the Chiltern tracks) and join the Watford Junction-London Euston DC Line, possibly at a grade-separated junction. This area is currently metropolitan open land, but a small triangle of it would be needed. The link would also improve interchange between these two rail lines for Brent and Harrow residents generally.</p>	<p>Noted. The area identified for the connection is within Northwick Park subject to metropolitan open land designation. As such it would be protected from development. As this potential transport link is speculative and is unlikely to be delivered in the timeframe of the Local Plan it is not considered appropriate to identify the potential route/ safeguarding at this stage, which in any case is unlikely to be compromised due to the MOL designation.</p>	No Change.
6.8 Transport	Blank Transport	John Cox	<p>Some years, Sudbury & Harrow Road is Greater London’s least used railway station with four morning and evening peak trains into and out of London Marylebone. The station environment is poor.</p> <p>Local Plan narrative should mention the proposed diversion of many Chiltern commuter trains at South Ruislip, via rebuilt Greenford and North Acton stations. Trains would run to a two-track terminus at Old Oak Common station, squeezed between the HS2 and the Crossrail/Great Western Main Line platforms. That would reduce pressure on the Chiltern Main Line and more trains could stop.</p>	<p>Although changes to the Chiltern Line services are interesting, this is unlikely to significantly affect the area as it already has high PTAL and therefore in the context of future development potential will not amend the approach to this Place.</p>	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
6.8 Transport	Blank Transport	John Cox	<p>Reference to "Cross Rail" in 6.8.6 should be changed to "Crossrail, Great Western Main Line". Brent wishes to see two new stations on the Dudding Hill Line (Harlesden and Neasden). Par 3.33 only mentions Neasden, but Figure 6 shows both. Both stations should be given equality of esteem. Previously, Brent has asserted that the Dudding Hill Line stations should have passive provision for 8-car passenger trains. Brent must add the 8-car wording in part of the narrative. Strategic planning policy remains with the boroughs' Local Plans and Brent should not try and kick the aspirations for the Dudding Hill Line stations to the WLEPB. Capability for longer-distance, inter-regional trains at a later stage is a sound and positively prepared aspiration for the Borough. With known railway lines planned or being built, the Dudding Hill Line might one day support for example a Guildford - Harlesden - Neasden - Cambridge service which would benefit the connectivity of Brent's Growth Areas, helping the modal shift from cars. For transparency it should be explained what the council has stated at formative stages about the possible nature and number of Brent's Dudding Hill Lane stations and their platforms. LB Barnet has completed a study on the integration of 8-car platforms at the proposed Brent Cross West Thameslink station and it seems inevitable that 8-car platforms will be expected at the proposed Old Oak Common Lane station. The Brent Local Plan does not mention passive provision at Brent's Dudding Hill Line stations for 8-car platforms, therefore the Plan is not sound because it would be more positively prepared if it did.</p>	<p>The reference to Crossrail will be amended to refer to Elizabeth Line. Neasden station will also be added. Mention of the need for passive provision of 8 car is also considered appropriate.</p>	<p>Paragraph 6.8.6 amend: ".....Old Oak Common (Cross-rail <u>Elizabeth Line, Great Western Mainline</u> and High Speed 2 stations)....." Paragraph 3.33 amend: "...with an <u>additional stations at Harlesden and Neasden (2026).</u>" Policy BEGA1 infrastructure requirements amend: ".....space for proposed public transport improvements including the West London Orbital line and station <u>with potential for platforms for up to 8 car-trains.....</u>"</p>

7 DELIVERY AND MONITORING

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
7 Delivery and Monitoring	Figure 35	Innovative Infill	BH4 does not have measurable targets indicating a lack of desire to drive delivery of housing on small sites.	Agreed. As there is a small sites target in the new London Plan, delivery against this should be monitored.	Figure 39 amend by adding: "Performance Measure <u>Number of homes built on small sites</u> . Target <u>433 dwellings</u> . Specific policy to be monitored <u>BH4</u> "
7 Delivery and Monitoring	Para 7-1-5	CCG	NPPF paragraph 34 requires Plans to set out the level of developer contributions for affordable housing AND other infrastructure. Paragraph 20 also requires strategic policies ensure the sufficient provision of health infrastructure. Whilst the IDP lists what is required, the plan should be amended to provide a clear link and the role of developer contributions, ensuring they are sustainable for the NHS. We are concerned health infrastructure is not consistently referenced throughout the Plan, as has transport and green infrastructure. It should be included within the infrastructure requirements section of site allocations that they should contribute to health infrastructure to mitigate the impact of growth. This approach should be consistent throughout the paragraphs, policies and site allocations, for example, BP6 does not currently reference health facilities.	The need to address health infrastructure requirements is understood. Providing sufficient health infrastructure is reliant to a large extent in identifying needs arising from development and identifying solutions to meet that need. In absence of this any policy is likely to be generic. It is recognised that greater emphasis could be placed in the Place policies on consistency on health infrastructure and this will be a proposed modification.	Policy BP2 East Amend: " k) Securing sufficient physical and social infrastructure on and off site to support the Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Staples Corner and Neasden Stations' Growth Areas, in particular and ensuring the improvement of the Welsh Harp and its setting. Policy BP3 North amend: "m) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Secure sufficient physical and social infrastructure on and off site to support an increase in population at Burnt Oak and Colindale</u> " Policy BP4 amend: " <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at As part of the development within the Northwick Park Growth Area where the following improvements to community and cultural facilities should be achieved:</u> " Policy BP5 under Community and Cultural Facilities amend before m) by adding another bullet: " <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities</u> " Policy BP5 amend: "k) <u>Meeting social</u>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
					<p><u>infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities notably Securing infrastructure in South Kilburn to include a new community space, 3 form of entry primary school and nursery and other community uses.</u></p>
<p>7 Delivery and Monitoring</p>	<p>Para 7-1-5</p>	<p>CCG</p>	<p>Clause b) on page 21 recognises the challenge for health, however, this is not reflected in the Monitoring and Delivery (para. 7.1.5) does not reflect the borough capacity issues. This should be amended as follows: '...The council also works closely with Brent CCG on their estate strategy and in seeking sufficient capacity for General Practitioner surgeries where required on new development sites. Recent examples include the Wembley Park development, the Peel development in South Kilburn and the Waterside development in Alperton. Subject to early identification of the need for premises from the CCG, and agreement on acceptable premises rents it is not envisaged that there will be significant difficulties in addressing longer term needs arising from developments related to additional premises. It is envisaged that increased capacity for existing primary and community care will be required at some existing facilities to increase out of hospital care and meet the needs of a growing and changing population. The impacts of development on health infrastructure should be mitigated through the use of S106 agreements, where appropriate and offered at an affordable rent, and through CIL contributions.'</p>	<p>On paragraph 7.1.5 the suggested amended text is considered appropriate. The CCG has made it clear to the Council that on-going rent for new facilities at the levels currently negotiated create budgetary issues due to lack of current available funding.</p>	<p>Policy BP2 East Amend: "k) <u>Securing sufficient physical and social infrastructure on and off site to support the Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Staples Corner and Neasden Stations' Growth Areas, in particular and ensuring the improvement of the Welsh Harp and its setting.</u> Policy BP3 North amend: "m) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Secure sufficient physical and social infrastructure on and off site to support an increase in population at Burnt Oak and Colindale</u>" Policy BP4 amend: " <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at As part of the development within the Northwick Park Growth Area where the following improvements to community and cultural facilities should be achieved:</u>" Policy BP5 under Community and Cultural Facilities amend before m) by adding another bullet: "<u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities</u>" Policy</p>

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
					BP6 amend: "I) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities notably Securing infrastructure in South Kilburn to include a new community space, 3 form of entry primary school and nursery and other community uses.</u>
7 Delivery and Monitoring	Paras 7-1-6 - 7-1-18	John Cox	All wording in the section needs review to incorporate 'plain English' to try and make it easier to read fluently. 7.1.6 Change "subsidisation" to "subsidy" 7.1.6 Explain "I4B" 7.1.8 Should be "on-going funding" 7.1.18 Change to "is the Brent River Park" 7.1.18 Remove either "trying" or "seeking".	Paragraph 7.1.6-7.1.18 All changes agreed.	Paragraph 7.1.6 amend: "...thorough cross subsidisation <u>subsidy</u> on development Paragraph 7.1.6 amend: "...arm's length delivery vehicle (<u>company name: i4B</u>) in assisting .." Paragraph 7.1.8 amend to "...on-going funding..." Paragraph 7.1.18 amend to: "...open space are <u>is</u> the Brent River Park" Paragraph 7.1.18 amend to: "...different ways of trying seeking to support...."
7 Delivery and Monitoring	Para 7-1-15	OPDC	Health provision is a cross boundary issue and the need for ongoing joint working between OPDC and Brent should be recognised in the text.	Agreed. There are a number of social infrastructure items that serve cross boundary communities. The need to work across these boundaries should be identified in the Plan.	Paragraph 7.1.15 amend at end: " <u>There is the potential for expansion of healthcare provision in the Brent area to support growth in adjacent communities and vice versa. The Council and the Brent CCG will work with adjoining boroughs (and OPDC) and relevant CCGs to ensure suitable and timely provision of necessary facilities.</u>
7 Delivery and Monitoring	Para 7-1-19	John Cox	Paragraph 7.1.9 Not delivering the West London Orbital would "fundamentally undermine" all Growth Areas across north-west London, so why not say so? The Growth Areas design would need to ensure protected public land for future rail infrastructure/ stations to not undermine delivery. Staples Corner Growth Area might actually be the least affected, because its promised station is still likely to happen, and in the short-term as well. This will at least provide good radial links to central London. LB Barnet is unwilling to say if platforms for Brent's Dudding Hill Line trains will be passively provided unconditionally at Brent Cross West station.	The WLO position as set out in the paragraph is considered fair. At Neasden and Harlesden the WLO will assist delivery of growth but is unlikely to be fatal to the prospects of those areas. It is agreed that for Staples Corner, Thameslink will improve matters, nevertheless, its PTAL will still remain comparatively low and thus potentially not as attractive to investors.	No Change.
7 Delivery and Monitoring	Figure 39	John Cox	Performance Measure: "No loss of viable public houses" To: "No loss of public houses" as this emphasises the default position of the council.	Public house measure: The measure of no loss of a viable pub is considered fairer, as this takes account of whether it is realistic for the pub to remain.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
7 Delivery and Monitoring	Figure 39	John Cox	Include a Performance Measure on: "Poverty and Deprivation" through long-term monitoring of specific sections of existing communities suffering poverty and deprivation. Currently there is not enough data on changes since your last Local Plan and it might affect this Plan.	Poverty and Deprivation Measure: Accepted. Add proportion of Brent Local Super Output Areas in the bottom 20% of most deprived areas nationally as identified in the Indices of Multiple Deprivation. Add proportion of the top 20% least deprived areas nationally as identified in the Indices of Multiple Deprivation.	Figure 39 amend by adding new first and second measures: Performance Measure " <u>Proportion of Brent Local Super Output Areas in the bottom 20% of most deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>15% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> " Performance Measure " <u>Proportion of the top 20% least deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>2% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> "
7 Delivery and Monitoring	Blank Delivery and Monitoring	John Cox	Change name to "Delivery Risks and Monitoring" which is more accurate of content.	Delivery and Monitoring is considered an appropriate title as it incorporates more than risks.	No Change.
7 Delivery and Monitoring	Blank Delivery and Monitoring	Andrea Diez	Delivery social infrastructure and housing around Willesden Green, Stonebridge Park station, Kensal Green, Neasden, Kilburn, and Queens Park.	Agreed, some of these are specifically identified as growth areas which have identified infrastructure needs (such as South Kilburn), whilst others will not be subject to such high levels of housing growth.	No Change.
7 Delivery and Monitoring	Blank Delivery and Monitoring	Mary Duffy	Plan should be assessed by central government, with efforts made to curtail investor influence.	The Plan will be submitted for examination to an independent planning inspector.	No Change.

8 APPENDICES

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
8 Appendices	Appendix 4	TFL Spatial Planning	Proposed standard of 1 space per 200 sq. m. applied to areas north of the Dudding Hill rail line appears a rather crude boundary. It includes Wembley Opportunity Area where good public transport connectivity and co-ordinated transport investment would justify a more restrictive approach. The potential West London Orbital rail route would increase connectivity. The differential parking standard could lead to an anomaly. Areas immediately to the north of reopened stations would have a very different parking standard to those south, regardless of PTAL or proximity to stations.	<p>The Dudding Hill railway line is not considered to be a crude boundary. It marks a very clear dividing line between the southern “Inner London” part of the Borough, where PTAL values are generally high and CPZ’s are extensive, and the northern “Outer London” area of the Borough where PTAL values are generally lower and CPZ’s less comprehensive. The exception is the Wembley Opportunity Area, which the London Plan has more restrictive standards for offices in Outer London Opportunity Areas, so Wembley would be covered by these.</p> <p>It is acknowledged that the potential opening of the West London Orbital Railway to passenger services could create an anomaly whereby very different standards are applied to sites on either side of stations along the line. However, there is currently no certainty that the West London Orbital line will reopen to passenger traffic and even if it does receive the necessary funding, it is likely to be a number of years before it does open. It is likely that the Plan will be subject to review in this time when the standards can be reviewed. If the West London Orbital line does come into operation so that PTAL values along the route rise, extensions to CPZ’s would also be likely, so a redrawing of the boundary between “Inner” and “Outer” Brent standards, perhaps along the line of the North Circular Road, may be appropriate at that time.</p> <p>Given Tfl’s comments, it would be useful to clarify that in applying London Plan B1a office standards, Inner London standards apply to areas of Brent south of the Dudding Hill Railway line (i.e. offices in those locations shall be ‘car-free’).</p>	8.4.1 Amend: "Parking standards for B1a uses <u>in outer London</u> as set out in the London Plan policy T6.2 apply <u>to all B1 uses</u> in Brent. <u>For office development south of the Dudding Hill Line Inner London standards will apply.</u> "
8 Appendices	Blank Appendix	John Cox	<p>(4) The Appendices: Every Appendix should have a narrative paragraph that describes what it is achieving (some do). That description should also refer to what sections in the Local Plan they are appendices of. (Appendix 2 already does in its title.) The alternate light-green, dark-green, light-green colour banding in all appendices ought to start with a dark-green, not a light one (as is does in Figure 39). That banding is confusing in Appendix 1 and Appendix 3. To solve that, add a narrow white strip after lines 3, 6 and 9 in the former and after line 3 of the latter. Then start the banding scheme afresh (which means with dark-green) for the lines that follow the white strips. All words on the first line of each appendix table (plus, where appropriate from the above comments, for lines 4, 7 and 10) should be changed to bold text (as it is in Figure 39).</p>	4. Noted.	4. Improve structure/ consistency of structure within appendices, include a clear title and explanatory opening paragraph for each section. Improve structure of tables by ensuring consistent formatting, including bold headings, and break up tables in appendix 1 & 3 using breaker lines to improve clarity.

GLOSSARY

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Glossary	Blank Glossary	GLA	Locally Significant Industrial Sites (LSIS) - is primarily suitable for industrial uses. Non-industrial uses should only be introduced as part of a plan-led or masterplan approach in accordance with London Plan Policy E7 and the Mayor's Practice note on industrial intensification through plan-led and masterplan approaches. See London Plan Policy E1.	Noted. The definition in the glossary can be amended to refer to industrial rather than employment.	Glossary Locally Significant Industrial Sites amend: " Employment Industrial sites identified in the Core Strategy Local Plan as being of significance to Brent's economy."
Glossary	Blank Glossary	John Cox	(8) Add a definition of "Intensification Corridor" to the Glossary. Mention necessary conditions like PTAL levels.	8. Agreed - add definition of intensification corridor to Glossary.	8 Glossary amend: " Intensification Corridor: Principal movement corridors such as main roads, with good access to public transport where it is considered that higher density development/ buildings around 5 storeys are likely to be appropriate."

OVERALL

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Overall	Blank Overall	John Cox	Every map in the Local Plan should show the borough's railways. It will not make the maps too crowded by including a thin black line for every railway corridor and small black blobs for stations. It also emphasises the close strategic link between land use and fixed transport infrastructure. For future strategic planning, showing both the interconnection of Brent's districts by railways and their severance are both important.	Noted. See proposed changes.	Include railway lines/ stations on all appropriate maps within the Plan.
Overall	Blank Overall	Scott Bartle	Note majority responses made to the last consultation were from other public authorities (i.e. the environmental agency etc.). Suggest you give general public response more thought. Instead of just 'noting' things, adapt and make changes based upon what the public have said. There was also no online comments page section on the website - again making it more difficult for public responses.	The Council responded to all comments received during public consultation, giving each equal weight. Full responses were given to the majority of comments from residents, those which were noted were general comments supporting elements of the Plan. The majority of detailed responses did come from organisations rather than residents and such bodies usually identify specific elements where the Plan needs to be amended.	No Change.
Overall	Blank Overall	Environment Agency	A robust flood risk evidence base, including a sequential test document, have not been provided to justify allocation of certain sites. The lack of sequential test was raised previously, which Brent said it would address. This must be applied whilst the Plan is in preparation and not prior to publication or submission as stated in the NPPF. It is yet to be effectively demonstrated that this has been carried out, either through the Local Plan or the level 2 SFRA.	The Council has undertaken a Strategic Flood Risk Assessment Level 1 and Level 2 for individual sites as well as considering flooding as an item in the Sustainability Appraisal of each Proposed Site Allocation. The SFRA Level 2 identified that as Brent's housing target as set out in the London Plan could not be delivered in Flood Zones 1 and 2 and as such sites within Zones 3 was subject to the exceptions test. The Plan has been clear about which allocations are within flood zone 3 and has identified where further work will be required from the applicant in terms of a detailed site flood risk assessment and a sequential approach to the location of development on site to reduce flood risk. A summary table setting out each site's consideration against the sequential test is being produced to provide further clarity on this matter.	No Change.
Overall	Blank Overall	Northwick Park Partnership	Support policies and aims, especially promotion of sustainable development. Plan identifies 8 Growth Areas where development should be prioritised for efficient and intense development to ensure land optimisation. Northwick park will make a significant contribution towards Brent's housing target and therefore welcomes its allocation as a Growth Area. We look forward to working with the council toward such aims.	Support welcomed.	No Change.
Overall	Blank Overall	John Cox	Reg19: Suggested formatting and general corrections(1) The PDF file, the "Local Plan (whole document)" should be reformatted as single A4 landscape pages, not mostly double-page spreads. Although there are 400 real pages, there are only 218 PDF pages. It is impossible to go to a particular real page number (because you do not know where to go) or to print a single page. The PDF's 'Contents' list (called 'Bookmarks' by Adobe Reader) misses labelling some of the sections and has items with 'Part' numbers in their names that do not correspond to the document section numbers. Also, all of the Contents item names start with the long word string: "8365 Local Plan A4 landscape – Part" which in practice means they all look	1. Agree to consider ways in which the document when finalised can be made easier to read on a hand held device, such as single page.	1. Address ability to navigate document effectively – may require conversion from double page spread. Ensure contents works effectively and corresponds to correct pages.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
			identical on screen. Some of the Contents item names also have unnecessary version numbers.		
Overall	Blank Overall	John Cox	(2) The menu page for the “Individual sections for smaller download” ought to have the section numbers included in the titles of the various images. For instance, the wording on the menu page for: “Central Place” should change to: “5.1 Central Place” but that one specific example should change further, to “5.1 Central Place (and Places map)”. Annoyingly, there is no direct ‘one level back’ from the menu page to the “Shaping Brent’s Future Together” page, because for some reason you have dropped two structure headings within the purple banner at the top. Presumably the headings list will wrap around successfully in any browser if it is more than one line long, so don’t drop them. All those 21 section PDF files should be reformatted as single A4 landscape pages, not mostly double-page spreads. They should also have their PDF page numbers coinciding with their real page numbers (which the PDF file format easily allows). For instance, the “5.3 North Place” should not have PDF page numbers of ‘1 to 15’, but ‘103 to 130’ instead.	2. The existing Shaping Brent's Future Together webpage is for the draft document. Once the document is adopted, the page will be reconfigured, with greater emphasis placed on coherence and navigation. These comments will be taken into consideration at that stage.	2. Update the website on adoption to make it easier to access parts of the Local Plan
Overall	Blank Overall	John Cox	(6) All subheadings throughout the Local Plan must be in blue text. Some are not (for instance, two on page 336).	6. Noted. The sub headings on page 366 are the correct format.	No Change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Overall	Blank Overall	John Cox	<p>(7) Much of the Local Plan consists of a blue tinted box containing a numbered "POLICY", followed by a series of subheadings beginning with "JUSTIFICATION". The golden rule should be that: No subheading or text of any Policy should proceed the Policy on the page. Compliant examples of that rule are single-column Policy boxes on page 303, and the double-column Policy box on page 336. An example of a failure for a single-column Policy box is on page 305. That must be corrected by swapping over the Policy BH12 box and the subheading "APPLICATION INFORMATION" below it, which belongs to the previous Policy BH11. (Actually, since "LONDON PLAN" subheadings are mean to be last in a subsection, paragraph 6.2.93 ought to be moved before the "LONDON PLAN" one in the first column.) Failed examples for double-column Policy boxes are on pages 315 and 340. They should be rearranged as in your example on page 356 (or you may decide that is being too pedantic). The clarity of that example of page 356 is helped by only having bold text across the two columns above the Policy box, and normal text below it. That would not be the case correcting the layout error on page 324. After moving the text around, a two-column horizontal rule above the Policy box would ensure the eye moved horizontally to reach the end of paragraph 6.4.45, rather than continuing down the centre column. Finally, just when you think some of this is being too pedantic, where exactly does the associated text for Policy BSWGA1 on page 244 start? I assume it starts at paragraph 5.7.30, but it needs a blue "JUSTIFICATION" subheading. (To correct everything, move the Policy box to the start of page 245. Move all the text until the end of paragraph 5.7.29 backwards a page. Start 5.7.30 below its new subheading at the bottom of the first column on page 245, and flow the rest of the text, including over to page 246, where the moved primroses photograph can fill the first column.) And where does the associated text for policy BNGA1 on page 116 start? Oh, two pages earlier, it seems. (To at least partly correct this, crop the bottom of the photograph on pages 112 and 113, to move paragraph 5.3.39 on to the previous page. That deliberately results in a little white space at the bottom of the middle column of page 114. Then start the third column with a new horizontal rule. At least that will warn the reader something odd is going on. Then all is revealed on page 116.)</p>	7. Noted. Agree to amend where necessary.	<p>7. Ensure supporting text/ images to policies do not precede the policy itself throughout the document, and that the structure follows: policy, supporting text, associated LP policies, evidence base, forthcoming documents. 8 Glossary amend: "Intensification Corridor: Principal movement corridors such as main roads, with good access to public transport where it is considered that higher density development/ buildings around 5 storeys are likely to be appropriate."</p>

POLICIES MAP

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Policies Map	Blank Policies Map	Dominvs Group	Policies map is not clear as boundaries overlap, and polygons used are too similar. It is not clear whether the 'egg' shaped blue dashed line centred around Wembley is intended to depict a Tall Building Zone – if so, this appears incorrect and should reflect the Tall Building Zones shown for this area within the Brent Tall Buildings Strategy (October 2019), which are supported.	Noted. It is acknowledged that the policies map is very busy when all layers were added. The map was split into 3 separate maps containing layers that did not conflict wherever possible. The website contained the following text: "We recognise the policies map shows a lot of information. A number of designations may share common boundaries. As policy layers have been placed on top of each other this might reduce the clarity of some boundaries. To assist we have provided the below maps. Each has a reduced number of designations. The layers have been distributed across three maps as was appropriate to improve clarity. If you require clarification on any boundaries please do not hesitate to contact us." The Tall Buildings Zone on the Policies Map was consistent with the Tall Buildings Strategy.	No Change.

IIA

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
IIA	Blank IIA	Andrea Diez	More redevelopment should be in areas such as Willesden Green, Queens Park, Neasden, Kilburn, Kensal Green and Harlesden.	<p>Policy BEGA1 (Neasden Stations Growth Area) supports the regeneration of Neasden, with the Growth Area being allocated for Strategic Industrial Location and Locally Significant Industrial Sites subject to co-location and intensification, new passenger railway line infrastructure and residential development.</p> <p>The other proposed Growth Areas are either already existing (Wembley, Alperton, Burnt Oak / Colindale, Church End and South Kilburn) or are newly proposed (Northwick Park, Staples Corner, and Neasden, as discussed above). The newly proposed Growth Areas have been allocated due to being employment and residential areas that are not reaching their full potential compared to other parts of the borough, pointing to new large scale regeneration opportunities. Although Willesden Green, Queens Park, Kilburn, Kensal Green and Harlesden have not been allocated as Growth Areas, the policies in the Local Plan will still ensure that proposals for development within these areas which will result in strong and inclusive communities, make the best use of land, create a healthy borough and deliver the homes to meet Brent's need, will be supported.</p>	No Change.
IIA	Blank IIA	Thersa	The IIA is too long and an abridged version should have been included.	A non-technical summary of the IIA is available on the Shape Brent webpage. Unfortunately, it is not possible to reduce the non-technical summary version further without compromising the content of the IIA.	No Change proposed. However, an updated version of the IIA non-technical summary to be published along with updated version of IIA.
IIA	Blank IIA	Environment Agency	Previous comments in response to the Preferred Options Consultation have not been addressed in relation to the methodology for determining impacts on sites located in Flood Zone 2. The table in par 3.6 does not adequately assess/ categorise certain sites at risk of flooding, particularly <50% within FZ2 and <50% within 'moderate' groundwater flood risk area. The current methodology categorises such sites as having the same risk of flooding as sites located wholly in FZ1, which is incorrect. In line with national policy and the sequential test, a site wholly in FZ1 should be prioritised for allocation of a site partially in FZ2. Following this methodology the evidence for the Brent Local Plan is not justified.	The council disagrees that the evidence for the Local Plan is not justified. The suitability of sites in relation to flood risk has been considered throughout the Local Plan process, including the allocating of sites, and the SFRA Level 2 notes that Brent is not able to accommodate all of its housing target within Flood Zone 1 alone. Comments in relation to the methodology and the categorisation of sites within Flood Zone 1 / Flood Zone 2 and groundwater flood risk in order to support / evidence the carrying out of the sequential test are noted and a change to the IIA methodology in relation to flood risk is proposed.	Amend the methodology in the IIA so that: <ul style="list-style-type: none"> I) In relation to EN12a, sites within Flood Zone 1 are categorised as "Minor Positive" and sites which fall partly within Flood Zone 2 (but less than 50%) be ranked as "Neutral"; II) In relation to EN12b, sites with low groundwater flood risk are categorised as "Minor Positive" and sites with less than or equal to 50% within 'moderate' groundwater flood risk area to be ranked as "Neutral"

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
IIA	Blank IIA	Mary Duffy	The upper height for Staples Corner has been increased to 15 storeys. This is unacceptable and will destroy the area. Supports the findings of DEFRA and Historic England. - DEFRA Biodiversity Calculator should be included as a potential indicator for EN5. - Mapping exercise should be undertaken every 3-5 years for newly created habitats to track effort- River morphology surveys for River Brent catchment- No mention of flooding on communities and rivers- Policies should seek to achieve the equivalent of 'good' ecological status post Brexit- Characterisation Study will be of high value in understanding the impact of / helping shape developments- Some site allocations have not identified heritage considerations (BCSA1, BNWSA1, BSSA17, BSESA21)- Brent Reservoir SSI should be included as a criterion under EN5 - Health Impact Assessment should be separate- Concern over MOL land swap proposal- Too complicated- Green space should be increased- Infrastructure improvements should happen prior to / alongside with residential development- Changes made include: reference to DEFRA Biodiversity Calculator, mapping exercise for new habitats, reference to river morphology, surveys on River Brent catchment, amend the second EN% target to 'development schemes within the borough achieve a net gain for biodiversity'	The existing site is a gateway to Brent and wider London, and gives a poor initial impression, and overall the masterplan will aim to improve the area rather. The publication stage version of the Tall Building Strategy notes that an appropriate heights of buildings within the Staples Corner Growth Area could range from 6-20 storeys. A masterplan will be carried out for the Growth Area and will be required to take into account of the character of the surrounding areas. Given the size of the Growth Area, heights of the proposed buildings may vary across the site (the Tall Building Strategy notes that the area to the east is most suitable for the core of taller buildings, with the buildings in the area in the main being mid-rise 6 - 8 storey buildings). Policy BEGA2 notes that the proximity and two storey suburban character of adjacent areas to ensure that buildings are stepped down towards the edge of the Growth Area, and also refers to the need for appropriate assessments to be undertaken to ensure local heritage assets and their settings are preserved or enhanced, in addition to views from the Welsh Harp needing consideration in terms of design to improve its setting. Development of the area will aim to provide a higher quality public realm, pedestrian and cyclist environment and to open up views to / enhance views from Welsh Harp. Support for DEFRA's, Historic England, Natural England and residents' previous comments / findings is noted. The council's responses to the comments received at the previous stage of consultation from these can be found at https://www.brent.gov.uk/media/16414596/all-comments-summary-v3.pdf	No Change.
IIA	Page 388	Historic England	3rd bullet point under Evidence Gaps should be changed to "APA review will take place in 2020", and recommend a direct link to the APA webpage.	Noted.	Update the Evidence Gaps to refer to the 2020 APA review, with a link to the APA webpage.

TALL BUILDING STRATEGY

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Tall Building Strategy	Blank Tall Building Strategy	St. George	<p>Object as not sufficiently flexible, not effective. Policy BP7 seeks to focus tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton. Site Allocation BSWSA7 - Northfields (“Grand Union”) comprises a fundamental part of the Growth Area. Grand Union is subject to planning permission ref. 18/0321 (as amended by application 19/2732). This permits a range of tall buildings up to 25 storeys, supported by existing adopted development plan policy and the Council’s own evidence base. To be effective, the Local Plan Proposals Map should include BSWSA7- Northfields within the Tall Building Zone. It is important that the Local Plan allows enough flexibility to respond to the objectively assessed needs of Brent, and its population. The policies that affect BSWSA7 should be flexible enough to allow for changes over the plan period. This means responding to the scale of development already granted planning permission and acknowledged within the Tall Building Strategy.</p> <p>Amend: Extend the Alperton Growth Area Tall Building Zone and Core to include Site Allocation BSWSA7- Northfields</p>	The Northfields development does contain buildings that in the context of the Tall Buildings policy would be regarded as tall, with the parameter heights on large parts of the permitted development 19/0465 over the equivalent of 10 storeys above ground level and therefore consistent with other areas identified as Tall Buildings Zones. As such it is considered justified that the Tall Buildings Zone and an Core for the Taller Buildings away from sensitive edges on the Policies Map should be extended to include the Northfields development site.	Amend the policies map to include the Northfields development site within the Tall Buildings Zone. Update the associated Tall Buildings Strategy to reflect this change.
Tall Building Strategy	Blank Tall Building Strategy	Sudbury Town Residents Association	<ul style="list-style-type: none"> Brent’s Tall Building Strategy is not community-led; it is development and profit-led and disregards the Sudbury Town Neighbourhood Plan. A statement that the Tall Building Strategy will not apply in Sudbury Town. 	Brent's Tall Building Strategy is evidence-led, based on looking at where high PTAL ratings are located, locations of conservation areas, and where existing tall buildings are located (amongst other factors as outlined in the strategy). The Tall Building Strategy will help inform development decisions across the whole borough, and notes that Sudbury Town is not suitable to be allocated as a Tall Building Zone in which tall buildings (those of 10 storeys or more) are considered appropriate.	No Change.
Tall Building Strategy	Blank Tall Building Strategy	Quintain	Support identification of locations for tall buildings and that Growth Areas are included within these locations. The Tall Building Strategy has been revised and is now considered sound.	Support welcomed.	No Change.

INFRASTRUCTURE DELIVERY PLAN

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Infrastructure Delivery Plan	Blank Infrastructure Delivery Plan	Metropolitan Police Service	Support reference to 'policing and other criminal justice or community safety facilities' within supporting text of policy BS11. We would like to meet to discuss how MET infrastructure requirements can be accounted for by S106 and CIL. Reference to Dedicated Ward Offices should be made in the IDP stating that the MET will liaise with developers on schemes referable to the Mayor.	Noted. See proposed changes.	Update Police section of IDP to reference need for Dedicated Ward Offices. Such facilities should be provided in certain circumstances and developers should liaise with the MET on schemes referable to the Mayor. A map was attached to identify key locations for delivery.
Infrastructure Delivery Plan	Blank Infrastructure Delivery Plan	Highways England	The Plan may be challenged as no Infrastructure Delivery Plan has been produced. Supporting schemes need to be identified, costed and have an outlined method of funding.	Noted. An Infrastructure Delivery Plan has been produced. It was made available on the Local Plan Evidence Base webpage during the consultation. The document will be updated on a rolling basis as and when new requirements present themselves throughout the Council's service providers and associated bodies.	Identify any highway schemes related to the M1 that become evident as the evidence base for the London Plan further addresses transportation impacts with inputs from Highways England.

HISTORIC ENVIRONMENT PLACEMAKING STRATEGY

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
Historic Environment Placemaking Strategy	Good Growth in Brent	Philip Grant (Wembley History Society)	the photograph beside paragraph 9.11 should read: '3 and 5 Buck Lane, Buck Lane Conservation Area.'	Note. See proposed change.	Historic Environment Placemaking Strategy photograph adjacent to 9.11 amend: "'3 and 4 5 Buck Lane....'"
Historic Environment Placemaking Strategy	Pages 24- 25 & 41	Philip Grant (Wembley History Society)	Local History Societies should be added to the references to local communities and residents' associations in the discussion box at the bottom of page 24, in objective 3, and the strategic objectives section.	Noted. See proposed change.	Local History Societies' added to the section on consultation for locally listed buildings.
Historic Environment Placemaking Strategy	Page 36	Philip Grant (Wembley History Society)	The heading at the top of the page incorrectly refers to Lidl, and should instead read: 'Iron age and Roman pottery found in 2013 on the site of the former "Blackbirds" public house, Blackbird Hill, Wembley'. The text at the bottom of the page should begin: 'Fragments of Iron Age and Roman pottery were found in 2013 ...'	Noted. See proposed change.	Historic Environment Placemaking Strategy Page 36 amend: "Iron age pottery found in 2013 on the site of the former "Blackbirds" public house, underneath the Lidl supermarket Blackbird Hill, Wembley"
Historic Environment Placemaking Strategy	Blank Historic Environment Placemaking Strategy	Philip Grant (Wembley History Society)	Noted that Archaeological Priority Areas will be reviewed in 2020. Note map of St. Andrew's Old Church Archaeological Priority Area. This area should be extended by around 30m to the north east to Blackbird Hill in light of the 2013 excavation which revealed what appeared to be a Roman boundary ditch. This should include properties on both sides of Old Church Lane, and along the south east side of Tudor Gardens. Not sure if this can be included within the strategy, however, this should be put forward for consideration in the 2020 review.	Noted. The points made about St Andrew's Old Church Archaeological Priority Area will be shared with the Council's heritage officer and the area identified for consideration in the review of the Archaeological Priority Areas.	No Change.