

London Borough of Brent

Examination of the Brent Local Plan

Matters, Issues and Questions for the Examination

Response of the Council: Matter 2 – Vision, strategy and objectives

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Main Issues: Does the Plan identify a Vision and Strategy for the Borough and is the preferred approach appropriately justified?

Are the strategic objectives justified and in accordance with national policy and the London Plan?

[Policy DMP1 and Section 4 of the Plan]

Questions

- 2.1 *With reference to section 4 of the Plan - Development Vision and good growth in Brent, which are the strategic policies? Does the 'Development Vision' provided on page 28 of the Plan, and its supporting text on pages 28 and 29, provide an appropriate framework for the policies set out in Sections 4, 5 and 6 of the Plan? Are the strategic objectives of the Plan clearly set out, adequately explained and are they consistent with national planning policy and the London Plan? If so, please explain precisely how?*
- 2.1.1 Appendix 6 refers to what are Strategic and Non-Strategic Policies within the Local Plan. Strategic policies are included throughout the Local Plan in Sections 5 and 6. There are no strategic policies identified for Section 4.
- 2.1.2 The draft London Plan is extensive in its content, setting out much strategic policy content for Brent. Section 2 para 2.15 of the Plan identifies that the draft Brent Local Plan has sought to complement it. The Plan has sought to be a concise useable document. The draft London Plan's six Good Growth Objectives (which were originally policies) as identified in paragraph 4.37 of the draft Local Plan set out the very wide-ranging fundamentals which development in London should deliver. These high-level objectives and clauses set out the strategic approach to development in London. All criteria in the objectives are applicable to Brent and as such form the strategic priorities for the development and use of its land. In association with policies in the draft London Plan, they therefore shape what Brent's draft Local Plan policies will deliver. The Council has identified some highlighted locally specific aspects of these good growth objectives can be addressed by the Brent Local Plan.
- 2.1.3 Preceding this, Section 3 sets out existing Brent Characteristics in relation to a number of matters consistent with the policy chapters of the draft London Plan. It also identifies some of the challenges ahead. This is considered a sufficiently detailed high-level summary that appropriately sets the scene for the sections that follow including the vision, strategic priorities for development and the more detailed spatial strategy and policies for Brent's development.
- 2.1.4 In moving to Section 4, whilst many of London's characteristics are shared, each borough including Brent has its own differentiating characteristics. Given the draft London Plan's good growth objectives extensive coverage, the

Council did not identify any matters that it considered should be added. To provide more local distinction of good growth outcomes and strategic priorities for the development and use of land in Brent, the highlights, where possible were related to places of specific characteristics. These, together with the need to specifically address draft London Plan policy requirements, such as policies on borough housing targets are followed through into Sections 5 and 6 of the Local Plan. As such, it is considered that the document follows a logical order. Issues, trends and challenges are identified, the overarching good growth principle objectives that will shape development of the borough and some specific highlights for Brent are identified and then expanded in relation to the places in section 5 and the specific topics in section 6. Each of the places or matters covered in these sections sets the scene and makes appropriate reference where necessary to national and draft London Plan policy content, or specifically references the appropriate draft London Plan policies.

- 2.2 *Is the Plan's 'Key Diagram', set out in Figure 6 on page 29, sufficiently clear and effective in illustrating the Council's strategic development vision for the Borough?*
- 2.2.1 The Council considers that the key diagram identifies the key areas of change and focus for development, which is consistent with NPPF paragraph 23's requirements, i.e. Growth Areas, together with locators such as town centres and the North Circular Road and River Brent tributaries. It identifies a significant infrastructure project that can improve public transport accessibility across the borough (West London Orbital), as well as highlighting that open space plays a significant contribution to the characteristic of the borough.
- 2.2.2 With such diagrams there is always the trade-off between inclusion of detail and impact on simplicity of the message. The diagram has received little comment. In response to representations set out in Core_04 a potential minor modification MiM123 that it would include railway lines/stations on all appropriate maps. The Council would however be open to other suggestions on how to improve the Key Diagram's clarity and effectiveness.
- 2.3 *Section 4 and the 'Development Vision', in effect, broadly repeats the London Plan's six core 'Good Growth' objectives. Is this approach consistent with the Framework which advises that local plans should not repeat existing policies?*
- 2.3.1 The headings of the Good Growth Objectives are identified, although slightly adapted to reference to the London Borough of Brent rather than London. The aim was to show a consistency of approach with the emerging London Plan and set out some more locally relevant strategic priority objectives. The Council attempted to make the Plan as open and understandable as possible to the public by making these links clear, and how they would be interpreted in Brent. In paragraph 4.37 it identifies that what follows are highlights of how these higher level objectives will be addressed in places in Brent.
- 2.3.2 The highlights tried to make the London Plan Good Growth objectives more obviously relevant to Brent, not repeat the criteria of the London Plan. Wherever possible they are made spatially specific by identifying locations

where they will be applied. Alternatively, they try to relate to Brent specific characteristics, such as its diversity or status as London Borough of Culture 2020. As such, they are not considered to be an unnecessary repetition.

- 2.4 *Notwithstanding the above, the 'Development Vision' does not align with the specific detail of the London Plan 'Good Growth' objectives. For example, under the heading 'making the best use of land' in the London Plan, eight specific measures are identified. The submitted Plan outlines three measures. Therefore, is it accurate to purport that the Plan reflects these Good Growth policies? How have the specific measures in the Plan been selected?*
- 2.4.1 As set out in response to question 2.3, the aim was to give highlights of how these good growth objectives would be delivered in Brent. It sought to try to focus on this local distinctiveness so that direct repetition of the London Plan objectives' criteria did not occur. Where criteria are not specifically addressed in this section, it was essentially due to limited ability in providing succinctly any significant local distinction. As the Good Growth objectives have shaped the policy content of the draft London Plan and the draft Local Plan has sought to be in general conformity with it, it is considered a fair statement that the plan reflects their content.
- 2.5 *Does the Plan adequately address the issue of neighbourhood planning? In particular, does the Plan, in terms of the identified 'Intensification Corridors' and the development of 'Vale Farm' as a regional centre for sports excellence, conflict with the policies and aims of the Sudbury Town Neighbourhood Plan?*
- 2.5.1 The Council considers that the Plan adequately addresses the issue of neighbourhood planning. To date four neighbourhood forums have been established, three are still active and two Neighbourhood Plans have been made in Brent. These are Sudbury Town and Harlesden. This is identified in paragraph 2.2 of the draft Local Plan. The Plan identifies strategic policies for the purposes of neighbourhood planning as set out in Appendix 6. Harlesden Neighbourhood Plan is identified in Policy BP5 criterion g) and paragraph 5.5.17 and the role it places on providing policies for housing and mixed-use developments. It identifies the Plan's site-specific allocations in Figure 24.
- 2.5.2 Sudbury Town Neighbourhood Plan is identified in paragraph 5.7.2 along with a summary of the main issues it focuses on: high streets, designation of Local Green Spaces and Vale Farm as a regional recreational facility. In relation to Vale Farm paragraph 7.7.25 identifies that the Council's leisure centre there is coming to the end of its useful life. It identifies that the Council supports the ambition of improving Vale Farm and will explore all options of how this can be achieved within the financial parameters available to it.
- 2.5.3 In relation to intensification corridors in the Sudbury Town Neighbourhood Plan area, it is considered that the areas designated in the draft Brent Local Plan are appropriate and do not conflict with any of its policies or identified aspirations. The policies, objectives and aspirations focus on the town centre, public realm, green spaces, movement, and development and change, enhancing the local area and reflecting the needs of the community. In relation to the neighbourhood plan's section on development opportunities the

policy focus is on town centres as set out in TCD1. The paragraph prior to this policy on page 46 does however note that: "density and design policies are established by the Core Strategy and London Plan, though we suggest that proposals for any new development be in the order of two to three storeys high." This community's general position on height is not an adopted policy.

- 2.5.4 Draft London Plan has set a minimum housing target that will be challenging for the Council to achieve. This includes a significant increase in the amount of development anticipated from windfall small sites (that is sites of less than 0.25 hectares). The Mayor sees outer London as providing the bulk of new housing and suburban intensification through small sites as delivering a significant part of that capacity. Draft London Plan Policy H2 Small Sites criterion B states: "boroughs should recognise in their development plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites." The Council has sought to support this requirement through identifying opportunities for priority locations for intensification of development on small sites to occur, including town centres and intensification corridors. In these locations, greater density to make a more efficient use of land will be supported through greater heights being considered appropriate in principle.
- 2.5.5 Much of Brent and outer London is suburban in character, predominantly being two or three storeys. Sudbury is similar in terms of its scale of height of buildings, with some the exception of recent buildings, such as adjacent to Sudbury and Harrow Road station, which rises to eight storeys.
- 2.5.6 The intensification corridors have been identified along main movement corridors on the basis of their public transport accessibility, their limited proximity to or inclusion of designated and non-designated heritage assets and width, which from an urban design/character/environmental perspective should be able to accommodate buildings of a bigger scale. Focussing more significant change in a smaller number of areas also has the potential to greater retain existing character across the remainder of the borough, including other parts of Sudbury.
- 2.5.7 Sudbury in close proximity to Sudbury and Harrow Road station has a Public Transport Accessibility Level (PTAL) of 5. In the Brent context, this is one of the better performing areas. The intensification corridors in Sudbury to the south have this PTAL level, whilst in the north they are in the 3 to 4 range.
- 2.5.8 Notwithstanding the identified preference for the scale of development on page 46 of the neighbourhood plan, the strategic housing need context is very different to when that plan was going through its process of adoption (greater than twice the number per annum). Although it is clearly an area which a great many residents appreciate, the Council considers that overall Sudbury's character is not so special that it should be regarded as less of a priority for intensification compared to areas with similar characteristics across the borough.

- 2.5.9 Government has signalled its intention to increase housing delivery across the country. New permitted development rights effective from the 1st August in most areas of England, in principle allow two storey upwards extensions to 3+ storey blocks of flats. These will apply in areas not subject to designations such as conservation areas. This will potentially increase heights and change the character of parts of Sudbury even if not identified as intensification corridors in the Local Plan. A block on the corner of Brewery Close could extend to seven storeys and Gaumont Court to five storeys, and adjacent to Sudbury and Harrow Road station potentially to 10 storeys if this is below 30 metres overall.
- 2.5.10 Taking account of the above, the approach to the intensification of parts of Sudbury Town neighbourhood area is regarded as justified.
- 2.5.11 In relation to Vale Farm, the draft Local Plan acknowledges its status as Local Green Space. The Neighbourhood Plan's policy identifies its potential as a regional centre for sports excellence. The draft Local Plan introduces no policies that supersede or undermine the policies of the Neighbourhood Plan in this respect. The draft Brent Local Plan is positive in acknowledging that the Council will do what it can within the resource available to it to support the neighbourhood plan's policies on Vale Farm.
- 2.5.12 The Neighbourhood Plan's designation of Vale Farm including the buildings within its curtilage effectively gives the same protection in the national planning policy framework as Green Belt. The draft Brent Local Plan does not need to fully repeat policies of the Neighbourhood Plan. The tests for allowing development of Local Green Space, particularly of existing undeveloped land are very high. As the draft Local Plan is not proposing any amendment to policy that will affect this status, there is no conflict with the Neighbourhood Plan. Nevertheless, to address the Residents' Association's concerns, the Council proposes a modification as set out in Appendix A. This is that the Neighbourhood Plan identifies the desire to see Vale Farm develop as a regional sports facility subject to no loss of green or open space.

Appendix A Proposed Minor Modifications to the Plan

Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
5.7 South West	5.7.25	"The Sudbury Neighbourhood Plan supports development that results in the strengthening of Vale Farm as a regional centre for sports excellence <u>and that improvements should not result in the loss of green space or open space.</u> "	To reflect policy VF1 Vale Farm of the Sudbury Town Neighbourhood Plan 2015 wording.