

London Borough of Brent

Examination of the Brent Local Plan

Matters, Issues and Questions for the Examination

Response of the Council: Matter 9 – Places (including Site Allocations)

Matter 9 – Places (including Site Allocations)

Main Issue: Are the policies and site allocations outlined within the places section of the Plan justified, effective and consistent with national policy?

[Section 5 of the Plan]

General Questions

9.1 *In relation to all of the proposed site allocations contained within 'Section 5 – Places' of the Plan:*

- *Are the criteria in the allocations policy necessary, relevant and deliverable?*

Yes. The purpose of the allocation and its large size necessitates further guidance to ensure that the optimum and most sustainable form of development is achieved on site. The criteria are considered necessary as they set out spatial designations and site specific requirements in line with the NPPF, Guidance, draft London Plan and Local Plan. It also sets out site's local context and constraints.

The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations. It allows infrastructure and assessments to be considered at an early stage. NPPF (Para 28) suggests that LPAs should use non-strategic policies to set out details in site allocation policies for developments to make sufficient provision of infrastructure, other assessed needs and design principles to be considered at an early stage.

- *Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?*
- *Is the description of the site necessary to be included within the policy wording?*
- *Is the allocation justified by the evidence base?*
- *Is the extent of each site correctly identified?*
- *Are the detailed requirements for each site clear and justified?*
- *Is the allocated site deliverable?*
- *Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?*
- *Have all the site constraints, development mix and viability considerations been taken into account?*

In order to provide a comprehensive response for each of the site allocations, it is requested that the Council respond to each of these bullet points above individually for each site allocation within the 'places' identified. All responses should be supported by reference to the evidence base as appropriate.

The Council has addressed this through a separate set of schedules that applies the above request to each site allocation split by each of the Places.

- 9.2 *What is the purpose of the percentage of employment land, conservation areas, open space as shown within each of the places? Does this reflect the existing or proposed position?*
- 9.2.1 The purpose was to communicate factual data sets into simple statistical visual information. This is easily graspable, rather than a long sentence. The place map is a spatial representation of those designations whereas the percentages are measured representation of them within the boundary of the place.
- 9.2.2 The data extracted from GIS mapping of the borough provides the existing position of employment land, conservation area and open space of the place.
- 9.3 *Is the approach to the PTAL rating consistent across the sites? All of these appear to relate to 2031 – what is the relevance of this date? In some instances, the text reflects the current PTAL rating and in other cases not – what is the reasoning for this?*
- 9.3.1 Although the wording for the PTAL ratings within the Site Allocation text differs throughout the allocations, they each use the Transport for London (TfL) estimated PTAL rating for 2031, each clearly stating this rating. This is a projected PTAL rating. It takes into consideration the public transport improvements which are likely to take place over the period. These are schemes that have a relatively high level of commitment either, as national infrastructure projects, or identified delivery in the Mayor’s Transport Strategy. It does not include schemes which may well come forward, but as yet have no commitment. The 2031 date is the furthest date forward that TfL project PTAL for currently. The Council is therefore identifying as best it can future longer-term public transport accessibility.
- 9.3.2 In many cases, the PTAL does not change to 2031. This may be because no transport improvements have been committed to in these areas. Alternatively, known improvements will not be sufficient so as to increase the PTAL rating. In some cases, agreed transport improvements such as those associated with Northfields are likely to also increase PTAL, but this would not yet have not been factored into the PTAL ratings. Areas which are within close proximity to the proposed West London Orbital line are likely to benefit through a potential PTAL increase by 1. As this scheme is not a commitment, this has yet to be factored into the 2031 TfL PTAL projection. For clarity, the Council will make minor modifications to the Plan to ensure consistency and also state that the PTAL rating is a 2031 estimate as set out in Appendix A.
- 9.4 *How have the indicative capacity figures for each of the site allocations been arrived at? In what way has the tall buildings study influenced the indicative capacity figures identified? Should these capacity figures be expressed as a minimum and are the site allocations sufficiently flexible in this regard?*
- 9.4.1 The starting point for the indicative housing capacity figures has been the 2017 London Plan SHLAA. This was based on the current London Plan density matrix ‘plus’. The ‘plus’ recognised that the matrix has essentially, on the majority of sites that have come forward (part of the reason it has not been

taken forward in the draft London Plan), under-estimated delivery levels. As such, the Council and GLA used densities based on the existing characteristics of the built form, or what would be deemed likely to be acceptable taking account of its accessibility to public transport and facilities given likely changes in policy aimed at increasing efficient use of land. The GLA provided a visual indication of what density looked like in terms of typologies. These were given greater weight in terms of the characteristics of development that is likely to be acceptable, rather than a particular adherence to the current Central, Urban and Suburban/PTAL 0-1, PTAL 2-3 and PTAL 4-6 matrix density range for the location. Section 2 of the London Plan SHLAA¹ sets out more detail on the methodology.

- 9.4.2 This has been supplemented by additional information. Where the site had been subject to an outline application, pre-application discussions or where a site in close proximity to the site had a scheme proposed that was consistent with the emerging policy, then this was used to inform the capacity. In addition, account has been taken of additional information submitted by developers in association with responses to the draft Plan. For some areas, more detailed masterplanning has also been undertaken, e.g. South Kilburn which gives a high degree of certainty of a minimum capacity taking account of known potential on-site constraints as well as policy requirements. In these locations, this masterplanning work would have been used.
- 9.4.3 The Tall Buildings Strategy has assisted in supporting the capacity identified. It has clarified the extent to which site assumptions on comparable developments of equivalent heights can be used. The majority of Tall Buildings Zones have had recent applications or pre-application discussions, or contain tall buildings. These have provided benchmarks to allow potential capacity estimation. Very detailed assessments on views has not been undertaken. Experience indicates on most sites that there is the flexibility to appropriately address potential impacts. This can be by locating taller buildings away from very sensitive areas, or reducing heights/massing.
- 9.4.4 In relation to the site capacities, the Council does not regard them as being appropriate as a minimum for policy requirements. Although it has a degree of confidence in the estimates, this will vary from site to site. Experience is that even very detailed masterplanning or planning application research sometimes does not identify potential constraints. For instance, utilities infrastructure information is often not accurate in identifying presence or alignment. Subterranean structures related to previous uses also can affect capacities. In this regard, paragraph 4.51 provides sufficient clarity and flexibility.
- 9.4.5 Designers can be particularly innovative and each will come to a site and produce different outcomes. Different developers also have different models/market sectors. The Council does not want the indicative capacity to be a constraint to a development that in all other respects meets policy requirements but can clearly go beyond the target. It does not want a

¹ London Plan Strategic Housing Land Availability Assessment GLA November 2017

minimum to be used to stifle market responses that for instance may meet a need, e.g. provide more than a minimum amount of industrial floorspace on a site potentially at the expense of residential space, or a focus on family housing. Neither does it want a minimum requirement to be used to help justify a scheme that is not policy compliant in other respects.

- 9.5 *In a number of instances, the 'planning considerations' section is extensive (for example BEGA2: Staples Corner Growth Area) and not precise. In accordance with the advice contained within the PPG, is the Council satisfied that this text provides clarity for developers, local communities and other interested parties about the nature and scale of development?*
- 9.5.1 The Plan seeks to provide a suitable balance between precision and flexibility to allow for appropriate development solutions to come forward. For Staples Corner, the Council is providing a broad framework for further detailed work to occur through a masterplanning approach. This will not be a closed process, but is likely on this site to involve a significant amount of engagement with the local community, occupiers of the premises and landowners. This will have to be done over a prolonged period to result in good outcomes as the area is subject to many small scale landownerships and business premises. The Plan recognises the complications of the site through the current timelines set out for delivery of any resultant dwellings.
- 9.5.2 The regeneration of the area, particularly through the desire to not result in a net loss of industrial floorspace (and also ideally increase it), but also create a successful new residential community will be complicated, requiring potentially as yet delivery models untested on the scale that will be required to result in significant change in this area. This includes intensification of industrial uses through multi-storey developments and larger scale vertical mixed use developments with industrial uses on the lower floors and residential/other uses above. Whilst London as a result of the industrial policies in the emerging London Plan is starting to see the emergence of this more mixed use industrial environment, e.g. Elephant and Castle, its viability particularly in outer London is as yet untested. This limits the extent to which the Council can identify the scale of development that ultimately will be delivered in the area at this stage and consequentially the necessary infrastructure required as a minimum and the extent to which wider potential positive interventions, such as improvements to Welsh Harp and a wider environment consistent with the healthy streets approach can be delivered.
- 9.5.3 Given the significant resource that is likely to be required to proceed with the masterplan and the existing status of the area as SIL, the Council wishes to provide some certainty that a positive development plan policy framework is in place before committing to this work.
- 9.6 *In a number of instances, the design principles are very specific. For example, BCSA7 Wembley Park Station (North and South) stipulates building heights across various parts of the site – how have these figures been arrived at? In other allocations, (for example BCSA8: Wembley Retail Park) the design principles merely cross reference a previous planning application. Is the*

approach to design principles consistent across the sites and justified by the evidence base?

- 9.6.1 NPPF (para 127 c.) suggests that planning policies should ensure that developments are sympathetic to local character including surrounding built environment, whilst not preventing change such as increased densities. The design principles of the SSA policy is suitable in order to meet other requirements of the Plan and also establish optimum use of land in light of its constraints.
- 9.6.2 The figures within the design principles for BSSA7 have been arrived pertaining to draft London Plan Policy D9 Tall Buildings and Tall Building Strategy. BSSA7 Wembley Park Station (North and South) is a large site with varying contextual spatial character and spatial designations due to its layout and location. This required specific design principles across various parts of the site to reflect tall building impacts in line with Policy D9 and Brent's Tall Building Strategy. Policy D9 suggests that the height needs to address positively the 'long range views' (part C, 1a, i), as such the protected view corridor from Barn Hill Open Space. 3.9.9 of the emerging London Plan also suggests tall buildings to not negatively impact protected views.
- 9.6.3 In regards to the 'mid-range view' (part C, 1a, ii), the form and proportion relevant to the townscape is suggested. In relevance to this, the BSSA7 requires the northern part to take reference from its surrounding and mediate between the taller height at Mathews Close and its lower density townscape to the north (Modification MM32 takes note of this). The southern site to take reference of the taller height of Mathews Close and Brook Avenue and stepping up closer to the station in reference to outer edge of town centre boundary and the station. In regards to the 'immediate views' (part C, 1a, iii), the site is required to setback and maintain active frontage.
- 9.6.4 In regards to spatial designation, all of the site falls within Wembley Opportunity Area/Growth Area where London Plan Policy SD1 suggests higher densities. Whilst only the south part of the site falls within the Tall Building Zone whereas the Plan Policy BD2 and Tall Building Strategy (9.2, p.55) requires heights to be consistent with the prevailing heights, and stepping down at the Zone's edges.
- 9.6.5 BCSA8: Wembley Retail Park is a large site, however the entirety of the site sits within the Wembley Opportunity Area/Growth Area and Tall Building Zone Core. The contextual spatial character and spatial designation does not vary within the site, thus not requiring specifications. It is surrounded by SSA, coming forward at high densities in consideration of the design exercise and the approved outline planning permission (ref: 15/5550).
- 9.6.6 However, for consistency, a modification is suggested as set out in Appendix A to BCSA8 to add: 'Building height and massing should respond to surrounding development coming forward as part of the Wembley Park redevelopment. The massing set out as such to protect the views of the stadium. The ground

floor should provide an active frontage on Rutherford Way/Fulton Road and Engineers Way.'

- 9.6.7 Across the plan, SSA design principles are based on the Tall Building Strategy, prevailing heights and spatial designations in line with the London Plan.

Specific Place Questions

Place 5.1 Central

- 9.7 *Figure 10 refers to 'other' site allocations - what are the status of these sites? Is the approach to 'other' site allocations consistent throughout the Plan? In relation to sites BCSA13-19, there is no narrative, is this correct?*
- 9.7.1 These are additional smaller sites within the Central place, which the Council consider do not require detailed site allocation policies set out for the remainder of the place. The sites are identified on the policies map. Some of the sites are subject to wider Wembley masterplan outline planning permissions, or lapsed permissions. For the Wembley masterplan sites, the Council considers that they were identified for non-residential uses to support Wembley Park's role as a town centre, or social infrastructure to support the residential community and overall mixed use place-making. It regards the allocations as necessary to provide certainty that the sites are appropriate for development (for example if put to a meanwhile use in the interim, such as former Malcolm House) and a policy framework against which any future applications for their use in particular can be considered.
- 9.7.2 The approach to 'other' site allocations is consistent throughout the plan, in that it seeks to focus on the smaller scale allocations within that Place. In the context of all the allocations in the Plan, it is recognised that some of the Central sites are comparatively large. In other places they might well have been considered appropriate for more detailed site allocation policies.
- 9.7.3 There is no detailed narrative of these sites as compared to the sites BCSA1-BCSA12. However, the Council considers that the table outlines sufficient information regarding these allocations. Nevertheless, in the context of the Place, the approach of the Plan is considered appropriate.
- 9.8 *Figure 11 lists major sites with planning permission- what is the purpose of this list? If it is to illustrate existing commitments is it necessary to provide the full list or just a total figure?*
- 9.8.1 The purpose of the list is to provide clarity on the extent of likely development in the Central Place in one document. Overall, the place chapter attempts to as best as it can, provide a clear site-by-site understanding of this in each location, identifying type of permitted use, albeit with a particular focus on housing as this is predominantly the type of major development that comes forward in Brent and the indicative homes coming forward across Central Place.

- 9.8.2 The information could be provided as a total figure. Nevertheless, the Council does not consider this as desirable as it reduces the transparency of where development is likely to occur.
- 9.9 *Policy BCGA1 advises that there is scope for 15000 dwellings, is this across the Plan period as a whole?*
- 9.9.1 Yes. This is across the Plan period. Appropriate modifications can identify the number of dwellings and the period it covers in relation to the Place, Growth Area and Site Allocations policies on the basis of the updated Housing Trajectory August 2020 referenced in relation to MIQ: Matter 5.14.
- 9.10 *Is policy BCGA1 and the terminology used sufficiently clear and consistent with the London Plan (Wembley Growth Area vs Wembley Opportunity Area)?*
- 9.10.1 BCGA1 sets out its strategic approach consistent with the adopted London Plan Policy 2.13, Annex One and Policy SD1 Opportunity Areas (OA) of the intend to publish London Plan.
- 9.10.2 Compliant to the adopted London Plan Policy 2.13 and Annex One, the Council published the WAAP. The WAAP recognises these strategic policies and designations that are particularly pertinent to Wembley. In order to keep continuity within the Council documents; Core Strategy and WAAP, the term 'Growth Area' was used in the Local Plan for Wembley and this was carried forward in Policy BCGA1 Wembley Growth Area of the Plan.
- 9.10.3 Both terminologies mean to recognise areas that will see the most significant change. However to provide more clarity, the proposed modification by GLA was taken into consideration from consultation response and is accepted. This is stated in the Schedule of proposed modifications (Core_04) (Ref number: MiM17) and has made it clear in the supporting text para 5.1.40 and relevant SSA.
- 9.11 *Is site allocation BCSA7: Wembley Park Station sufficiently justified in relation to the town centre boundary, the land uses envisaged and Wembley Park Station?*
- 9.11.1 The allocation is sufficiently justified based on the following:
- Town centre boundary: The site does not fall within the town centre boundary based on Recommendation B14 of the Brent Retail, Leisure & Town Centres- Document C – Strategy & Recommendations Report (EB_E_06). This states that the existing Wembley town centre is considered robust and should remain unchanged. However, given the fact that the site is located with Wembley OA/GA and adjacent to a town centre boundary, the site allocation recognises the site's full potential by allocating a mixed used development. TfL Commercial confirmed on 20th August 2020 that it no longer wished to pursue its Regulation 20 representation in relation to the town centre boundary being amended to capture the proposed allocation.

Envisaged land use: The envisaged land use is mixed-use residential led development. The replacement for office space was required to be replaced for the support of the existing TfL uses and not a general office use. This has been rectified and the proposed modification (MM28) recognises this to amend the policy.

Wembley park station: The site is an underutilised/disused railway sidings which can provide around 550 new homes (as identified in the revised trajectory). The policy consideration requires sufficient replacement of on-site parking associated with the station. However the site allocation does not consider the potential of new platforms at Wembley Park Station as the pre-discussions with the site owner (TfL) did not incorporate this future potential. However, this matter has been raised with TfL and the proposed modification (MM30) to planning considerations of the policy recognises this and has amended the policy accordingly.

9.12 *Is the wording in relation to buildings heights overly prescriptive and is it supported by the evidence base?*

9.12.1 Given the location of the site and the complexities of the surrounding area, it was felt necessary to include a more descriptive and carefully worded policy consideration. This involves considering existing surrounding heights, impacts on neighbouring properties, protected views from Barn Hill Open Space and Barn Hill Conservation Area. However, the design principles allows flexibility as it states 'all subject to impact on protected views of the stadium'.

9.12.2 The policy is supported by Brent's evidence base: Tall Building Strategy (EB_D_01). However, realising that Forty Lane is identified as an intensification corridor, it allows mediation of heights between Forty Lane and the southern site. The proposed modification (ref number: MM32) took into consideration the regulation 19 representation from TfL Commercial and is amended to exclude the cap of four to five storeys.

9.13 *Is site allocation BCSA10: York House sufficiently flexible in relation to the primary school provision?*

9.13.1 The site allocation is part of the wider masterplan redevelopment around Wembley Park and stadium. To support the new residential development in this area, a primary school is required as part of the development.

9.13.2 In November 2019, the Cabinet approved the 'Brent School Place Planning Strategy 2019-23' which is reviewed annually. It put forward planned action for additional school capacity required from 2023 onward. Wembley falls under 'Primary planning Area 3' and DfE has proposed to build a new Ark Somerville Primary school on the York House site. The report also specifies that DfE has indicated that the school will come on-stream when demand indicates that it is required. Table 12: Projections and capacity further confirms that there will be a deficit in primary school starting 2023.

- 9.13.3 The Local Plan consultation took place Oct-Dec 2019, the cabinet approved the revised strategy in Nov, 2019 and henceforth the delivery of this school is reflected in the site allocation. The assumption is that a school will be required at some point to meet the needs of Wembley Park's increased population. In terms of flexibility, it is recognised that Quintain own and continue to acquire land in and around Wembley Park and that this site is not the first to be identified for a primary school, although it is the only one to be subject to a full permission. There is no reason to assume that a school will not be required. Nevertheless, given Quintain's access to potential alternative sites, if for whatever the reason the site is not required for a school, the policy identifies that suitable alternative site provision will be required elsewhere. The allocation does not set out what alternative uses are appropriate should the school not come forward. The site is within the town centre boundary and so a variety of main town centre uses and residential would be acceptable, as well as other potential community uses.
- 9.14 *Is site allocation BCSA2: Stadium Retail Park and Fountain Studios sufficiently flexible in relation to the level of retail provision to be provided on the site?*
- 9.14.1 As the site is part of the Wembley Town Centre, the redevelopment of Stadium Retail Park will collectively enhance Wembley's retail offer as compared to the existing. Recommendation CSWB4 in the Retail and Leisure Study 2018 (EB_E_06) for Wembley takes into consideration the redevelopment of the Stadium Retail Park site and the loss of existing food store, recommending re-provision of at least one food store between 1,000 and 2,000 sq.m (net). As stated before, the area is considered in its entirety and as per recommendation the 6,100sqm convenience goods floorspace should be directed towards Wembley and Wembley Park areas.
- 9.14.2 This comprehensive approach in the evidence base provides for flexibility in relation to the level of retail provision on the site. The policy also acknowledges that the existing retail is an 'out of town in format'. Whilst the policy seeks to 'maximise re-provision of existing floorspace', in consideration of the approved outline planning permission (A1-A4 retail on ground floor) and evidence base, the policy wording offers sufficient flexibility.
- 9.15 *Site allocation BCSA4: Fifth Way/Euro Car Parts – Is the approach in relation to no net loss of employment floorspace justified and should the policy introduce greater flexibility?*
- 9.15.1 Euro Car parts site is currently an industrial use. It is a non-designated site due to the previous WAAP policy (Site: W27) which identified it as appropriate for mixed-use development along with other mix of employment opportunities and community needs.
- 9.15.2 The Local Plan supports this approach and the site's capability to form a buffer between the existing industrial uses (SIL) and new residential development. Furthermore, the site's spatial designation within the Mayor's Housing Zone and London Plan Opportunity Area/ Wembley Growth Area supports this redevelopment.

- 9.15.3 However, based on GLA's LILDS study, changing London Plan policies (Policy E4/E5/E7) related to industrial land and Brent's designation as a 'provide capacity borough' at that time established that Brent needs to maintain and expand this provision.
- 9.15.4 The recent SoS directions on the intend to publish London Plan does not change the current reflection of 'need' based on evidence. The GLA's assessment and London Plan policies requires boroughs to address the need to provide sufficient industrial, logistics and related capacity through its policies. In Brent's case, the GLA identified that the Council should provide an additional 43 hectares of industrial land. The West London Employment Land Evidence (EB_E_011) supports the industrial floorspace provision, however at a different scale (see Matter 6 for more detail). Both require additional provision overall over the Plan period, which the Local Plan policies seek to deliver.
- 9.15.5 Establishing the need to at least maintain the existing industrial capacity, moving forward, it is important to understand the policy requirement in relation to a 'Non-designated industrial site'. The London Plan sets out that non-designated industrial site allocation does not mean it will no longer be serving an industrial purpose. Emerging London Plan para 6.5.2 recognises the need to support and retain efficient logistics operations in SIL however, complemented by smaller scale provisions in LSIS and Non-designated Industrial Sites.
- 9.15.6 Draft London Plan Policy E7 Part C (no.2 and no.3) states that mixed use or residential development proposals on Non-Designated Industrial Sites should only be supported where 'it has been allocated in an adopted development plan document for residential or mixed-use development'; or 'Industrial, storage or distribution floorspace is provided as part of mixed-use intensification'. Para 6.7.5 of the draft London Plan further demonstrates the important of this. Henceforth, the retention of the same quantum of industrial floorspace of a type which meets current market demand can be required in Plan policy.
- 9.15.7 Additionally, Local Plan Policy BE3 requires an uplift in industrial floorspace where non-designated industrial sites come forward for redevelopment. Non-designated industrial sites account for approximately 22 ha of Brent's industrial land supply in terms of site area.
- 9.15.8 Given the approach is justified, Policy BCSA4 has extended this need centred on London Plan policy and evidence base whilst balancing the other priorities of the London Plan. As such the Council in its response (Core_03, p.21) to the representation made by the site developer recognises that the proposal will reflect a balance between a number of competing aims set by the London Plan and the council. As such, policy does not need to show greater flexibility than it already does as the site falls within the Tall Building Zone core which enables the development to sustain the uses directed by the site allocation policy.

Place 5.2 East

- 9.16 *Where does it set out the overall number of dwellings this sub area will deliver during the Plan period?*
- 9.16.1 To provide greater clarity in the Plan, the Council will propose modifications across all the Place policies. These will include the anticipated dwelling numbers in the Place over the Plan period. Where there are Growth Areas, the dwelling numbers anticipated from these in the period to 2041 will also be added and the site allocations updated to reflect the figures in the revised housing trajectory August 2020.
- 9.17 *Is the policy sufficiently flexible in terms of building heights envisaged? (page 85)?*
- 9.17.1 Yes, it is not considered to provide a constraint given the characteristics of the area (generally suburban 2-3 storey development, limited number of stations and town centres) and its ability to accommodate tall buildings. The policy is consistent with the findings of the Tall Buildings Strategy, policies BEGA1 and BEGA2 (both identifying potential for buildings taller than 30 metres) and Policy BD2 in relation to intensification corridors (5 storeys) and elsewhere no more than 2 storeys than the prevailing character, with exceptions where justified.
- 9.17.2 For the town centre heights of 6 storeys have been identified. This is inconsistent with BD2 in relation to town centres (generally 5 storeys, plus potentially higher at strategic locations). Whilst consistent with BD2 taller buildings may be acceptable in parts of the town centre, overall as shown by recent development on the corner of Birse Crescent and Neasden Lane, 5 storeys provides for a comfortable relationship within the context it sits. As such, there is no real reason for BP2 East to identify Neasden town centre as typically being 6 storeys. This can be amended through a proposed modification to 5 storeys to make it consistent with elsewhere in the borough.
- 9.18 *Site allocation BEGA2: Staples Corner Growth Area – Is this policy sufficiently clear in terms of acceptable land uses which may be appropriate on the site?*
- 9.18.1 The policy makes reference to residential (indicative capacity 2,200 new homes), a mixed use community and suitable social and physical infrastructure to support the Growth Area's change. Prior to a masterplan and understanding the potential of the area to accommodate a residential community and its likely size, plus potential supporting facilities as identified by the business community to improve Staples Corner operation/ attractiveness as a business location, no clarity other than would apply through the NPPF/London Plan and other development plan policies on the range of acceptable land uses can realistically be identified. It must be noted that draft London Plan policies currently restrict the appropriate range of uses within SIL to essentially industrial related ones. As such, it is likely that the need for specific uses will have to be justified in association with the masterplan preferred strategy.

- 9.19 *Figure 14 – ‘other’ site allocations and figure 15 – major sites with planning permission – what is the purpose of providing these within the Places section of the Plan?*
- 9.19.1 These are additional smaller site allocations which did not warrant detailed site specific allocation policies as have been outlined for the larger allocations. They have been included to provide more certainty to assist in delivery and provide clarity to all on the development to the Place within the Plan.
- 9.19.2 The major sites with planning permission have been included for completeness. The list gives a more accurate reflection of likely development, in particular housing coming forward within the place.

Place 5.3 North

- 9.20 *Policy BNGA1 advises the Burnt Oak/Colindale Growth Area will deliver over 2000 homes to 2041. Should this be reflected in policy BP3?*
- 9.20.1 To provide greater clarity in the Plan, the Council will propose modifications across all the Place policies. These will include the anticipated dwelling numbers in the Place over the Plan period. Where there are Growth Areas, the dwelling numbers anticipated from these in the period to 2041 will also be added.
- 9.21 *Figure 17 and 18 – ‘other’ site allocations and major sites with planning permission for housing– what is the purpose of providing these within the Places section of the Plan?*
- 9.21.1 These are additional smaller site allocations which did not warrant detailed site specific allocation policies as have been outlined for the larger allocations. They have been included to provide more certainty to assist in delivery and provide clarity to all on the development to the Place within the Plan.
- 9.21.2 The major sites with planning permission have been included for completeness. The list gives a more accurate reflection of likely development, in particular housing coming forward within the place.

Place 5.4 North West

- 9.22 *Policy BP4 North West general policy advises the Northwick Park Growth Area will deliver approximately 2600 homes. Over what period will this take place?*
- 9.22.1 The timescale is to 2041. To provide greater clarity in the Plan, the Council will propose modifications across all the Place policies. These will include the anticipated dwelling numbers in the Place over the Plan period. Where there are Growth Areas, the dwelling numbers anticipated from these in the period to 2041 will also be added.
- 9.23 *Figure 21 – major sites with planning permission – what is the purpose of providing these within the Places section of the Plan?*

- 9.23.1 The major sites with planning permission have been included for completeness. The list gives a more accurate reflection of likely development, in particular housing coming forward within the place.

Place 5.5 South

- 9.24 *Policy BSGA1 advises the Church End Growth Area will deliver 1040 new dwellings to 2041. Should this be reflected in policy BP5 South?*
- 9.24.1 To provide greater clarity in the Plan, the Council will propose modifications across all the Place policies. These will include the anticipated dwelling numbers in the Place over the Plan period. Where there are Growth Areas, the dwelling numbers anticipated from these in the period to 2041 will also be added.
- 9.25 *Does the opportunities section on page 152 provide sufficient support towards improving the townscape in the Stonebridge Park gateway?*
- 9.25.1 The opportunities section can only essentially provide a headline for potential changes to the place. Nevertheless, on reflection compared to other opportunities it is agreed a little more information could be provided which points towards the content of the Bridge Park and Unisys (BSSA7) site allocation in particular. As such a proposed modification is considered justified to add more detail. "Improve Stonebridge Park gateway through redevelopment of the Argenta House/Wembley Point and Unisys/Bridge Park sites. Unisys/Bridge Park presents the potential for a comprehensive redevelopment to replace the existing eyesore redundant tall buildings next to the North Circular and provide a scale of enabling development to support provision of a modern leisure centre with swimming pool."
- 9.26 *Site allocation BSSA1 – does the description accurately reflect the existing uses which take place on the site? Is the policy wording sufficiently flexible in terms of potential phased redevelopment of the site?*
- 9.26.1 Since the drafting of the plan, further work has been done to analyse the site as part of the planned Church End Growth Area intensification of the Locally Significant Industrial Sites. The western warehouse is now used as a film studio and production offices. The southern office is still occupied by the Probation Service. The remainder of the site including Cygnus Trade Centre is occupied by a variety of wholesalers, for whom the term 'warehouse' would be correct, also vehicle sale and repair, professional and other services, and utilities. The description can be adjusted; although not incorrect, there is further detail that can be added if required.
- 9.26.2 The phasing is a result of the analysis done on the site and the Council's understanding of ownerships and likelihood of development coming forward based on responses to the consultation on the draft local plan. The allocation identifies the potential for Asiatic Carpets to come forward first, subject to it demonstrating it doesn't prejudice delivery of a comprehensive masterplan, but does not prescribe it.

- 9.27 *Site allocation BSSA4 - where precisely is the evidence concerning a lack of community infrastructure in this location?*
- 9.27.1 The proposal within the site allocation is for a 'health, community and enterprise hub'. The evidence base that supports this is in the Health section of the Inclusive Growth Strategy (evidence base EB_S-02, page 23). The site allocation is just a little south-west of the 'Dudden Hill' label. There is a paucity of healthcare facilities in this area with just one health centre and two doctors' surgeries within a 1 km radius. The intensification planned in the Church End Growth area is going to bring a significant number of new homes into the area. Hence the health hub, which is not necessarily only a traditional 'doctors surgery', but in the context of the deprivation issues in Brent, may be a newer preventative, holistic and educational type facility, which would likely encompass health-related activities such as pre-natal and ante-natal classes, preventative mental health-related activities, childcare classes and exercise and diet advice services.
- 9.27.2 The evidence for the inclusion of an 'enterprise hub' is within the Industrial Land Audit, pages 44-47. Please see especially page 47. Please also see the Brent Workspace Study (evidence base EB_E_09) pages 38 to 49. Please see particularly, page 48, which refers to the lack of Incubator, Accelerator and Co-working space in Brent. The redevelopment of the site would involve the re-supply of a quantum of commercial space, and the enterprise centre element would be part of this. Again this may well include services of particular help to the newly self-employed, such as business-start skills support.
- 9.28 *Site allocation BSSA6 - does the description accurately reflect the existing uses on the site?*
- 9.28.1 There has been development on the site since the drafting of the plan. Wembley Point is commenced, and expected to be completed in 2021. Application for development at Argenta Way is awaiting legal agreement. This is expected to be started (building) in 2022 and completed in 2023. It is considered that as these developments and residential uses have not yet commenced, that the description remains correct.
- 9.29 *Figure 24 - 'other' site allocations is an extensive list (BSSA8-BSSA19). What is the purpose of this list?*
- 9.29.1 These are additional smaller site allocations which did not warrant detailed site specific allocation policies as have been outlined for the larger allocations. They have been included to provide more certainty to assist in delivery and provide clarity to all on the development to the Place within the Plan.
- 9.29.2 The major sites with planning permission have been included for completeness. The list gives a more accurate reflection of likely development, in particular housing coming forward within the place.

Place 5.6 South East

9.30 *Policy BP6 South East advises that the South Kilburn Growth Area will deliver approximately 3400 homes with a target of 50% affordable housing by the end of the plan period. Precisely which site allocations will deliver this quantum of housing?*

9.30.1 The 3,400 homes delivery relates to the gross dwellings number for the whole of the South Kilburn Growth Area programme, with its start in 2008 until its completion throughout this Local Plan. It is accepted that the target identified should actually focus on the development likely to occur within the Plan period. Taking account of the Housing Trajectory August 2020, a gross figure of around 2100 dwellings will be completed, whilst the net when taking into account demolition on the South Kilburn Estate will be 828, with windfalls generating an estimated 37 dwellings. The delivery of this net figure is broken down by site below.

Site Allocation/ Permission	Allocation name	Net housing figure
BSESA1	Austen	-36
BSESA2	Blake	50
BSESA3	Carlton House	68
BSESA4	Carlton Infant School	62
BSESA5	Craik Court	42
BSESA6	Crone & Zangwill	50
BSESA7	Dickens	-63
BSESA8	Hereford & Exeter	61
BSESA10	Neville & Winterleys	63
BSESA11	Old Granville Open Space	20
BSESA12	Wordsworth	-40
BSESA13	John Ratcliffe House	-23
BSESA14	William Dunbar House/ William Saville House	50
12/0788	Queens Park/Cullen	106
14/1896	Gloucester and Durham	26
16/1191	Stuart Road & Chippenham	40
16/4176	Peel Phase 1	-18
16/4176	Peel Phase 2	270
18/4716	133-137 Kilburn Lane	12
BSESA34	Kilburn Park Underground	20
20/0881	3 Cambridge Avenue	13
19/2378	Granville Centre	18
	Windfalls	37
Total		828

- 9.30.2 To take account of these figures a proposed modification is set out in Appendix A of this document.
- 9.31 *Site allocation BSESA18 – is the capacity indicated justified by the evidence base?*
- 9.31.1 The site was identified in the 2017 London SHLAA as urban PTAL 5 with a density of 405 dph. The Council considers the urban typology 260 dph more appropriate reflecting the conservation area opposite in LB Barnet. A height of 5 storeys on the Cricklewood Broadway frontage consistent with general acceptable heights in town centres (BD2 and 2-3 storey on Hassop Road is considered acceptable. Broadway frontage - 0.4 (area) x 260dph = 107 dwellings. Divide by 5 = 21 dwellings per storey x 3 storeys above the retail/ancillary = 63 dwellings. On the rear Hassop Road 145 dph * 0.16 = 23. Divide by 3 storeys, multiply by 2 storeys to take account of ground floor industrial = 15 - round up to 80 overall. The figure is indicative, but grounded in reasonable assumptions and therefore is justified by the evidence.
- 9.32 *Figure 27 – ‘other’ site allocations and figure 28 – major sites with planning permission for housing provide an extensive list of sites. What is the purpose of this list? What is the purpose of providing these figures within the Places section of the Plan?*
- 9.32.1 These are additional smaller site allocations which did not warrant detailed site specific allocation policies as have been outlined for the larger allocations. They have been included to provide more certainty to assist in delivery and provide clarity to all on the development to the Place within the Plan.
- 9.32.2 The major sites with planning permission have been included for completeness. The list gives a more accurate reflection of likely development, in particular housing coming forward within the place.

Place 5.7 South West

- 9.33 *There is no housing delivery figure provided within policy BP7 South West. However, policy BSWG1 advises the Alperton Growth Area will deliver over 6000 additional homes. Over what period is this? What is the overall contribution which the South West Place will make and how do the remaining site allocations within this section fit with the overall housing numbers?*
- 9.33.1 To provide greater clarity in the Plan, the Council will propose modifications across all the Place policies. These will include the anticipated dwelling numbers in the Place over the Plan period. Where there are Growth Areas, the dwelling numbers anticipated from these in the period to 2041 will also be added.
- 9.33.2 According to the revised housing trajectory: Total of Alperton growth area is 6837. The remaining site allocations in South West Place (not in Alperton Growth Area) are 2380. The windfall is 1427. In total, the South West Place will deliver an estimated 10,644.

9.34 *Is the policy wording at policy BP7 in relation to character, heritage and design and community and cultural facilities justified by the evidence base?*

9.34.1 The character, heritage and design is set out based on an accumulation of evidence base documents listed below. However a proposed modification (MM178) was taken into consideration from consultation responses and is amended to better reflect the character of South West Place in line with Tall Building Strategy and Plan policies.

- Character and Heritage evidence: Brent Historic Environment Place Making Strategy (EB_HC_01), Heritage & Culture - Brent Historic Environment Place Making Strategy Appendix (EB_HC_02), Heritage & Culture – Inclusive Growth Strategy Culture(EB_HC_02)
- Design evidence: Based on draft London Plan Policy H2 Small sites and H2A Small housing development, Brent’s Tall Building Strategy (EB_D_01) and Brent Design Guide SPD1 (SPD_01).

9.34.2 Community and cultural facilities need is based on the evidence base below. Improvements to Vale Farm and its Sports Centre is derived from the Open Space, Sports and Recreation Study 2019 (EB_GI_02).

- Community and cultural evidence: Brent’s Core Strategy, Alperton Masterplan SPD 2011-2019, Brent Workspace Study (EB_E_09), IDP (EB_I_01), Evidence base for social infrastructure (EB_S_01 – EB_S_05), IDP (EB_I_01) and IGS – Infrastructure (EB_I_02).

9.35 *Site allocation BSWA7: Northfields - does the policy text accurately reflect the existing uses and planning history of the site?*

9.35.1 It is agreed that the policy text did not reflect the accurate existing use and just the wider use of the site (Northfields Industrial Estate). Northfield’s redevelopment site covers a wider area than that which also includes units 2-18 Beresford Avenue & Capital House. The existing use is: Mixed Use (Industrial with residential under construction). To clarify this the Council has made a proposed modification (MM216).

9.35.2 The policy accurately reflects the planning history of the site. The description of the planning application was amended in July 2019 through a minor material amendment permission (19/2732). The planning ‘history’ of the site remains and is grounded in the granted hybrid planning application (18/0321) reflected in Policy BSWA7. At the time of drafting the SSA, Northfields hybrid planning application was granted permission, therefore the need to refer to any other application was not relevant.

Appendix A

Proposed Main Modifications

Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
Places	All site allocations PTAL Rating	Consistent approach for all to identify current PTAL and PTAL estimated in 2031	To provide the same type of information for all detailed site allocations.
5.1 Central	BCSA8 Design Principles	<u>'.....Building height and massing should respond to surrounding development coming forward as part of the Wembley Park redevelopment. The massing set out as such to protect the views of the stadium. The ground floor should provide an active frontage on Rutherford Way/Fulton Road and Engineers Way.'</u>	To provide more clarity on design principles it is expected that the development will need to achieve.
5.2 East	BP2 Criterion c)	<u>"...Within Neasden town centre this will be 6 5 storeys will also be appropriate.</u>	To reflect heights as set out in BD2.
5.6 South East	BP6 Criterion d	<u>South Kilburn Growth Area will deliver approximately 3,400 2,100 new high quality homes, or around 800 net additional homes once demolitions are taken into account, over the Plan period with a target of 50% affordable including social rented for existing secure tenants of South Kilburn.</u>	To better reflect gross and net development within the South Kilburn growth area over the lifetime of the Local Plan.

Proposed Minor Modifications

Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
5.5 South	Opportunities	<p>“Improve Stonebridge Park gateway through redevelopment <u>of the Argenta House/Wembley Point and Unisys/Bridge Park sites.</u> <u>Unisys/Bridge Park presents the potential for a comprehensive redevelopment to replace the existing eyesore redundant tall buildings next to the North Circular and provide a scale of enabling development to support provision of a modern leisure centre with swimming pool.</u>”</p>	<p>Add more detail to support site allocations.</p>

Matter 9 – Places (including Site Allocations)

Main Issue: Are the policies and site allocations outlined within the places section of the Plan justified, effective and consistent with national policy?

[Section 5 of the Plan]

General Questions

9.1 In relation to all of the proposed site allocations contained within 'Section 5 – Places' of the Plan: Examination of the Brent Local Plan

CENTRAL PLACE	
Site allocation: BCSA1 ASDA/THE TORCH/KWIKFIT	
Are the criteria in the allocations policy necessary, relevant and deliverable?	
<ul style="list-style-type: none">• Part of the site (Torch/Kwik fit) is carried forward from the WAAP 2015¹ (Wembley Area Action Plan) (site W23), the criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,<ul style="list-style-type: none">○ Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10○ The development to be sympathetic to the protected views, Barn Hill conservation area and adjacent Grade II former Town Hall required by the Tall Building Strategy and London Plan Policy HC3 Strategic and Local Views and supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).○ Maximise re-provision of industrial floorspace to assist in meeting Brent's industrial land needs and contamination remediation in line with London Plan policy E7.○ Other requirements relate to infrastructure such as junction improvements to assist in Brent's Long Term Transport Strategy (EB_T_03).○ Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.○ Urban greening measures through retaining mature trees as identified in London Plan Policy G5 and Open Space Study (EB_GI_02).○ The replacement community facility in a town centre location in order to address the social infrastructure need in line with emerging London Plan Policy SD6/SD7/S1 and Brent's Core Strategy for Wembley Growth Areas.• The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley², Wembley GA, Wembley Park Town Centre location, Brent's IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA (Brent Strategic Housing Market Assessment)	

¹ Brent Council, Wembley Area Action Plan (WAAP), 2015 <www.brent.gov.uk-wembley-area-action-plan.pdf>

² GLA, Housing Zones, 2017 <www.london.gov.uk/housing-zones>

2018. In addition, the council will work closely with developers to overcome any constraints.
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
<ul style="list-style-type: none"> • The 2017 SHLAA³ identifies the Asda site as a 'potential development' status and The Torch/Kwik Fit as an 'Allocation'. It recognises these sites as a 'large site capacity' with a potential to develop at 'Central' density. • The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. However, the Plan identifies a lower capacity of both the sites together as 485 factoring in the London Plan Policy E7 to re-provide industrial floorspace, retention of the existing retail unit, which is trading well, the need to re provide the public house and acceptable heights. • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020
Is the description of the site necessary to be included within the policy wording?
The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.
Is the allocation justified by the evidence base?
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2013 SHLAA, 2017 SHLAA and associated call for sites. • London Plan designated Opportunity Area (OA) • Mayor's Housing Zone (Wembley) • West London Employment Land Review 2018 (EB_E_011) • Brent Core Strategy⁴ (Wembley Growth Area (GA)) • Wembley Masterplan SPD 2009⁵ (Regeneration Area) • Wembley Area Action Plan • IIA - Site Allocation Assessments (Core_Gen _02) • Tested positive through the Sustainability Appraisal (Core_Gen _02)
Is the extent of each site correctly identified?
Yes, the extent of each site is correctly identified. The boundary has been informed by existing allocation in the WAAP and land ownership.
Are the detailed requirements for each site clear and justified?

³ GLA, Strategic Housing Land Availability Assessment(SHLAA), 2017
<www.london.gov.uk/strategic-housing-land-availability-assessment>

⁴ Brent Council, Core Strategy, 2010 <www.brent.gov.uk/core-strategy.pdf>

⁵ Brent Council, Wembley Masterplan Supplementary Planning Document, 2009
<www.brent.gov.uk/WembleyMasterplan.pdf>

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.

Is the allocated site deliverable?

This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Wembley Town Centre boundary and PTAL 5. It is an underutilised site which can comprehensively deliver mixed use residential development. The site is considered to be built out until the end of the Plan period, and therefore does not contribute to the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. The site is not within the Tall Building Zone but it falls within the town centre boundary allowing a lower scale of taller buildings. As such, part 4.26 and part 8.2 and Tall Building Strategy identifies sites within town centres with acceptable building heights of 15m (5 storeys) with opportunities to go higher at strategic points in town centres. Although the site is within the Wembley OA/GA, London Plan Policy D8 requires boroughs to define tall buildings based on local context. As such, the SSA considers the prevailing height of 7-9 storeys of the surrounding area and for the indicative height to not adversely impact the protected views, Grade 2 Listed former Town Hall and Barn Hill Conservation Area.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA2 STADIUM RETAIL PARK AND FOUNTAIN STUDIOS

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and recognised as a development site in the SSA DPD (Brent Local Development Framework- Site Specific Allocations DPD 2011)⁶. Part of the site (The Stadium Retail Park) has been carried forward from the WAAP (Site W13). The criteria are

⁶ Brent Council, Local Development Framework- Site Specific Allocations DPD, 2011
<www.brent.gov.uk/LDFSitespecificAllocationsDPD.pdf>

relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,

- Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
- The provision of commercial mix, educational use, leisure and student accommodation in order to address the exiting offer and the town centre location. In line with emerging London Plan Policy SD6/SD7/S1/S3/H15 and Brent's Core Strategy for Wembley Growth Areas.
- Meanwhile use has been delivered during its vacancy in line with London Plan Policy HC5, Retail & Leisure Needs Study (EB_E_06) and the Plan Policy BE4. Active frontage and permeability is required consistent with London Plan Policy D3/GG1.
- The development to be sympathetic to the protected views required by the Tall Building Strategy and London Plan Policy HC3 Strategic and Local Views.
- Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley, Wembley GA, Town Centre location, Brent's IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. With further regards to deliverability, there is an approved outline planning permission (17/3059) currently under construction and on site.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site is identified separately in the 2017 SHLAA. Fountain television studios as 'potential development' status and Stadium Retail Park as an 'allocation'. It recognises these site as a 'large site capacity' with a potential to develop at 'Central' density.
- The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. Keeping in mind the criteria, the outline planning application (ref: 17/3059) determines the indicative capacity of 966.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- 2013 SHLAA, 2017 SHLAA and associated call for sites
- London Plan designated Opportunity Area
- Mayor's Housing Zone (Wembley)
- Brent Core Strategy (Wembley Growth Area)
- Tall Building Zone (Core)
- Wembley Masterplan SPD 2009 (Regeneration Area)
- Wembley Area Action Plan
- Brent Local Development Framework- Site Specific Allocations DPD 2011
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership, existing allocation in the WAAP and the consented scheme (ref:17/3059).

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone (Core), Town Centre boundary and PTAL 5-6a. It is an underutilised site which can comprehensively deliver mixed use residential development. The site is considered to be built out within the Plan period, however it does not contribute to the 5 year housing land supply.

In addition, the site benefits from a consented scheme currently under construction on site.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.

The site is within the core of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views. In addition the strategy recommends reducing building heights near to the zone's boundary outside the core. As such, the SSA considers the prevailing lower-context height on Wembley Park Drive.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contribute towards housing targets, regenerating priority areas, potential uplift of landscape and respond to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA3 BROOK AVENUE

Are the criteria in the allocations policy necessary, relevant and deliverable?

- Eastern fringe of the site was part of the regeneration area in the Wembley Masterplan SPD 2009 and recognised as a development site in the SSA DPD. Part of the site (21-31 Brook Avenue) has been carried forward from the WAAP (Site W21). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
 - Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
 - Retaining the wildlife corridor and adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - Contribute positively towards waterside development and associated infrastructure due to the SINC Grade II Wealdstone brook located at the south of the site in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1.
 - The replacement hotel/ other main town centre uses at part of the site that falls within the town centre boundary in order to address the London Plan Policy SD6/SD7/E10 and Brent's Core Strategy for Wembley Growth Areas.
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley, Wembley GA, part within and part outer edge town centre location, Brent's IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- Part of the site is identified in the 2017 SHLAA as an 'allocation' recognising the site as a 'large site capacity' with a potential to develop at 'Central' density.

<ul style="list-style-type: none"> • The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. However, the Plan extends the SSA boundary including all of Brook Avenue, identifying a higher capacity for all of the site as 450 factoring in comprehensive development along with its strategic location and prevailing heights. • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2013 SHLAA, 2017 SHLAA and associated call for sites • London Plan designated Opportunity Area • Mayor's Housing Zone (Wembley) • Brent Core Strategy (Wembley Growth Area) • Tall Building Zone • Wembley Masterplan SPD 2009 (Regeneration Area) • Wembley Area Action Plan • Brent Local Development Framework- Site Specific Allocations DPD 2011 • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>Yes, the extent of each site is correctly identified. The boundary has been informed by existing allocation in the WAAP and land ownership.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.</p>
<p>Is the allocated site deliverable?</p>
<p>Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, part in the Housing Zone, part in the Tall Building Zone, part in the town centre boundary and PTAL 4-6a. It is an underutilised site which can comprehensively deliver mixed use residential development. The site is considered to be built out within the Plan period, however it does not contribute to the 5 year housing land supply.</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley</p>

OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.

Part of the falls within the edge of the Tall Building Zone, as such part 4.25 of the strategy For Tall Buildings Zones identifies the need to step down towards the Zone's edge to ensure an appropriate relationship with surrounding low rise context. As such, the SSA considers that the building height will be informed by the prevailing height of the surrounding area keeping in mind the intensification corridor on Forty Avenue which is expected by the strategy (part 4.26) at a general height of 15m (5 storeys).

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area and potential uplift of landscape. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of uses of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA4 Fifth Way/Euro Car Parts

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and part of the site was recognised as a development site in the SSA DPD. The whole of the site is carried forward from the WAAP (W27-Euro Car Parts). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
 - The development to be sympathetic to the protected views required by the Tall Building Strategy and London Plan Policy HC3
 - Maximise re-provision of industrial floorspace to assist in meeting Brent's industrial land needs and contamination remediation in line with London Plan policy E7.
 - Contribute positively towards waterside development and associated infrastructure due to the SINC Grade II Wealdstone brook in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1.
 - Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
- Taking into account pre-application discussions since 2018 and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for

<p>Wembley, Wembley GA, Tall Building Zone (core), Brent's IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. With further regards to deliverability, there is a full planning application (20/2033) for 1.29ha out of the 1.30 ha of the site to be determined.</p>
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> • The site is identified in the 2017 SHLAA as an 'allocation' status. It recognises this site as a 'large site capacity' with a potential to develop at 'Central' density. • The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. The Plan identifies a capacity of 500 factoring in the London Plan Policy E7 to re-provide industrial floorspace, the stakeholder meetings during pre-app and full application and acceptable heights. • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2013 SHLAA, 2017 SHLAA and associated call for sites. • London Plan designated Opportunity Area • Mayor's Housing Zone (Wembley) • West London Employment Land Review 2018 • Brent Core Strategy (Wembley Growth Area) • Wembley Masterplan SPD 2009 (Regeneration Area) • Wembley Area Action Plan • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>Yes, the extent of each site is correctly identified. The boundary shown on the site allocation figure follows the WAAP site boundary, land ownership and pre-app/full planning application scheme.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.</p>

Is the allocated site deliverable?

This site is considered deliverable as it is in a suitable designated location with high density development coming forward through Wembley masterplan development in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone (core) and relatively good PTAL 3-4. It is an underutilised site which can comprehensively deliver mixed use residential development. 1.29 ha of the site is considered to be built out within 5 years and will contribute to the 5 year housing land supply.

The site benefits from a proposal of full planning application which makes the site deliverable.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.

The site is within the core of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views. In addition the strategy recommends reducing building heights near to the zone's boundary outside the core. As such, the SSA considers the prevailing lower-context height on the eastern fringe of the site.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA5 Olympic Office Centre

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and recognised as a development site in the SSA DPD. The site (W 17 – Olympic Way Office site) has been carried forward from the WAAP. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10

- The provision of retail/Office led mixed use/education to incorporate main town centre uses and address the exiting offer and the town centre location. In line with emerging London Plan Policy SD6/SD7/S1/S3, Brent's Core Strategy for Wembley Growth Areas and Retail & Leisure Needs Study (EB_E_06).
- The development to be sympathetic to the protected views required by the Tall Building Strategy and London Plan Policy HC3 Strategic and Local Views.
- Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
- Minimal parking spaces to assist in Brent's Long Term Transport Strategy (EB_T_03) and Brent's Interim Climate & Ecological Emergency Action Plan (Core_Gen_014).
- Active frontage as required by London Plan Policy D3/GG1.
- The criteria are relevant taking into account the application (ref: 17/5097) with full planning permission and stakeholder representation through Reg 18/Reg 19 consultations. The criteria is also relevant if the permission relapses.
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley, Wembley GA, Town Centre location, Tall Building Zone (Core), Brent's IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. With further regards to deliverability, there is a full planning permission on this site.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site is identified in the 2017 SHLAA as an 'approval' status. It recognises the site as a 'large site capacity' with a potential to develop at 'Central' density.
- The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. Keeping in mind the approved application and surrounding high density developments, the capacity is identified at 253.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- However, the indicative capacity of the policy also clearly states that the site may be considered for relocation of the College Of North West London- so no residential dwellings have been assumed for the housing delivery trajectory on this site.

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

- The following evidence base documents have informed the site allocation:
- 2013 SHLAA, 2017 SHLAA and associated call for sites

<ul style="list-style-type: none"> • London Plan designated Opportunity Area • Mayor’s Housing Zone (Wembley) • Brent Core Strategy (Wembley Growth Area) • Tall Building Zone (Core) • Wembley Masterplan SPD 2009 (Regeneration Area) • Wembley Area Action Plan • Brent Local Development Framework- Site Specific Allocations DPD 2011 • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal • Full planning permission
<p>Is the extent of each site correctly identified?</p>
<p>Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership, existing allocation in the WAAP and the consented scheme.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.</p>
<p>Is the allocated site deliverable?</p>
<p>Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone (Core), Town Centre boundary and PTAL 5-6. It is an underutilised site which can comprehensively deliver mixed use residential development. The site is not considered to be built out within the Plan period, therefore it does not contribute to the 5 year housing land supply.</p> <p>In addition, the site benefits from a consented scheme making the allocation deliverable.</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.</p> <p>The site is within the core of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views.</p>
<p>Have all the site constraints, development mix and viability considerations been taken into account?</p>
<p>The council’s evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA’s allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.</p>

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA6 Watkin Road

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and recognised as a development site in the SSA DPD. The site (Watkin Road –W26) has been carried forward from the WAAP. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
 - Maximise re-provision of industrial floorspace to assist in meeting Brent's industrial land needs and contamination remediation in line with London Plan policy E7.
 - The development to be sympathetic to the protected views required by the Tall Building Strategy and London Plan Policy HC3 Strategic and Local Views.
 - Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
 - Urban greening measures through retaining and planting new trees as identified in London Plan Policy G5 and Open Space Study (EB_GI_02).
 - Active frontage as required by London Plan Policy D3/GG1.
 - Contribute positively towards waterside development and associated infrastructure due to the SINC Grade II Wealdstone brook located north of the site in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1.
 - In line with London Plan Policy E7/D13, incorporation of 'Agent of change principle' in developments with close proximity to the Wembley Business Centre.
 - Other requirements relate to infrastructure such as road improvements to assist in Brent's Long Term Transport Strategy (EB_T_03).
- The criteria are relevant taking into account the stakeholder representation through Reg 18/Reg 19 consultations and the various approved planning applications on site.
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley, Wembley GA, Brent's IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. With further regards to deliverability, there are approved planning permission on part of the site and pre-application discussion on the remaining sites.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site is identified in the 2017 SHLAA as an 'allocation'. It recognises this site as a 'large site capacity' with a potential to develop at 'Central' density.
- The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. However, the Plan identifies a higher capacity of 838 factoring in the London Plan Policy E7 to re-provide industrial floorspace, based on density of existing permissions and their detailed design assessment.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery is clear through the addition of all years and the breakdown of Watkin Road site according to planning status in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- 2013 SHLAA, 2017 SHLAA
 - London Plan designated Opportunity Area
 - Brent Local Development Framework- Site Specific Allocations 2011
 - Mayor's Housing Zone (Wembley)
 - Brent Core Strategy (Wembley Growth Area)
 - Wembley Masterplan SPD 2009 (Regeneration Area)
 - Wembley Area Action Plan
 - IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

Yes, the extent of each site is correctly identified. The boundary shown on the site allocation figure follows WAAP site boundary, the landownership and approved schemes.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.

Is the allocated site deliverable?

Yes. The site is deliverable as most parts of the site have come forward separately and already benefit from 2 approved planning permission and pre-apps:

- 1,2,3 & 9 Watkin Road: Full planning application to be determined (ref:20/0587)
- Parkwood House: Full planning permission with works on site (ref:17/2782), 113 units.
- 10 & 11 Watkin Road: Full planning permission with works on site (ref: 18/3381, 19/2750), 229 units.
- 7 & 8 Watkin Road: Pre-app

This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone (core) and PTAL 4. It is an underutilised site which can comprehensively deliver mixed use residential development. The whole site allocation is considered to be built out until the end of the Plan period, however, parts with full planning permission and works started on site will contribute to the 5 year housing land supply (as laid out in the trajectory).

The above shows that the allocation is deliverable and the remainder of the site is also suitable for delivery within the plan period.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.

Part of the site is within the core and rest at the edge of the Tall Building Zone. As such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views. In addition the strategy recommends reducing building heights near to the zone's boundary outside the core. As such, the SSA considers the prevailing lower-context height on the eastern fringe of the site particularly the residential amenity of the occupiers of North End Road.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA7 Wembley Park Station (North & South)

Are the criteria in the allocations policy necessary, relevant and deliverable?

- Part of site was part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and recognised as a development site in the SSA DPD. Part of the site has been carried forward from the WAAP (Site W22- Wembley Park Station Car Park). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
 - The provision of mixed use development in line with edge of town centre boundary, Brent’s Core Strategy for Wembley Growth Areas and Brent’s Local Plan Viability Assessment 2019.
 - The development to be sympathetic to the protected views required by the Tall Building Strategy and London Plan Policy HC3 Strategic and Local Views.
 - Retaining the wildlife corridor and adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.
 - Active frontage as required by London Plan Policy D3/GG1.
 - Other requirements relate to infrastructure such as junction improvements to assist in Brent’s Long Term Transport Strategy (EB_T_03).
- The criteria are relevant taking into account the stakeholder representation through Reg 18/ Reg 19 consultations. The pre-app discussions and the undetermined full planning application (ref:20/0967).
- The criteria are deliverable due to the site’s location. Part of the site falls within draft London Plan Wembley OA designation, Mayor’s Housing Zone, Wembley GA, part of the site closer to the station is at edge of Tall Building Zone, adjacent to town centre boundary. Furthermore, the criteria has been determined by the IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- Part of the site is identified in the 2017 SHLAA as ‘potential development’. It recognises these sites as a ‘large site capacity’ with a potential to develop at ‘Central’ density.
- The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. The capacity has been further developed based on consultation response from stakeholders, pre-app meetings and design exercise.
- The site is given a capacity estimate and the term ‘indicative’ sufficiently suggests this.

<ul style="list-style-type: none"> Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> 2013 SHLAA, 2017 SHLAA and associated call for sites London Plan designated Opportunity Area Mayor's Housing Zone (Wembley) Brent Core Strategy (Wembley Growth Area) Tall Building Zone Wembley Masterplan SPD 2009 (Regeneration Area) Wembley Area Action Plan Brent Local Development Framework- Site Specific Allocations DPD 2011 IIA - Site Allocation Assessments Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership, existing allocation in the WAAP and stakeholder consultation.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.</p>
<p>Is the allocated site deliverable?</p>
<p>Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has a relatively good PTAL 4. It is an underutilised site/partly vacant which can comprehensively deliver mixed use residential development. The whole of the site is considered to be built out within the Plan period, however the southern part is expected to be built at the end of the 5 year and therefore only 33% of it will contribute to the 5 year housing land supply.</p> <p>In addition, the site is deliverable as it benefits from pre-applications and the south part of the site has a full planning application to be determined (ref:20/0967).</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>Each site has a varied contextual spatial character due to its location. Part of the falls near the station falls within the edge of the Tall Building Zone, as such part 4.25 of the strategy For Tall Buildings Zones identifies the need to step down towards the Zone's edge to ensure an appropriate relationship with</p>

surrounding low rise context. As such, the SSA considers that the building height will be informed by the prevailing height of the surrounding area keeping in mind the intensification corridor on Forty Avenue which is expected by the strategy (part 4.26) at a general height of 15m (5 storeys).

Although the site is within the Wembley OA/GA, London Plan Policy D8 requires boroughs to define tall buildings based on local context. As such, the height should not adversely impact the protected views and the lower density residential context.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA8 Wembley Retail Park

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and recognised as a development site in the SSA DPD. The site (Site W 18 - Wembley Retail Park) has been carried forward from the WAAP. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
 - The provision of mixed use development in line with edge of town centre boundary, Brent's Core Strategy for Wembley Growth Areas and Brent's Local Plan Viability Assessment 2019.
 - Maximise re-provision of industrial floorspace to assist in meeting Brent's industrial land needs and contamination remediation in line with London Plan policy E7.
 - Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
 - The development to be in line with the Tall Building Strategy
- The criteria are relevant taking into account the stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the draft London Plan Wembley OA designation, Wembley GA, Tall Building Zone, adjacent to town centre boundary, IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site is identified in the 2017 SHLAA as an 'allocation' status and updated to 'approval'. It recognises these site as a 'large site capacity' with a potential to develop at 'Central' density.
- The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. In addition, keeping in mind the criteria, the capacity estimate was confirmed through pre-app meetings and the hybrid planning application.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020.

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- 2013 SHLAA, 2017 SHLAA and associated call for sites
- London Plan designated Opportunity Area
- Mayor's Housing Zone (Wembley)
- Brent Core Strategy (Wembley Growth Area)
- Tall Building Zone (Core)
- Brent Local Development Framework- Site Specific Allocations 2011
- Wembley Masterplan SPD 2009 (Regeneration Area)
- Wembley Area Action Plan
- Brent Local Development Framework- Site Specific Allocations DPD 2011
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

Yes, the extent of each site is correctly identified. The boundary has been informed by the land ownership, WAAP and the approved scheme.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone (Core), Town Centre boundary and PTAL varying between 3-6a due to its size. It is an

underutilised site which can comprehensively deliver mixed use residential development. The entire site is considered to be built out within the Plan period, however part of the site will contribute 800 units to the 5 year housing land supply.

In addition, the site forms the North Eastern Lands section of the Wembley masterplan with an approved hybrid planning permission (ref:15/5550).

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.

The site is within the core of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views. The plan identifies that will be home to the tallest building in the proposed development due to its core location.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA9 First Way

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and recognised as an allocation ((W5. Wembley Eastern Lands). The site (Site W 28 First Way) has been carried forward from the WAAP. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
 - The provision of commercial, educational use and student accommodation in order to address the exiting offer and the town centre location. In line with emerging London Plan Policy SD6/SD7/S1/S3/H15 and Brent's Core Strategy for Wembley Growth Areas.

- The development to be sympathetic to the protected views required by the Tall Building Strategy and London Plan Policy HC3 Strategic and Local Views.
- Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
- Maximise re-provision of industrial floorspace to assist in meeting Brent’s industrial land needs and contamination remediation in line with London Plan policy E7.
- Other requirements relate to infrastructure such as junction improvements to assist in Brent’s Long Term Transport Strategy (EB_T_03) and London Plan Policies T1/T2.
- Providing amenity space and adopting urban greening measures as identified in London Plan Policy D3/D6/D8/G4/G5, Plan Policy BGI1/BGI2/BH13 and Open Space Study (EB_GI_02).
- The criteria are relevant taking into account the stakeholder representation through Reg 18/Reg 19 consultations and pre-app discussions.
- The criteria are deliverable as this is supported through the draft London Plan Wembley OA designation, Wembley GA, Tall Building Zone, IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The 2017 SHLAA identifies the site as an ‘allocation’ status. It recognises these sites as a ‘large site capacity’ with a potential to develop at ‘Central’ density.
- The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes, the density matrix and consultation response from stakeholders. However, the plan identifies the final capacity as 1262 factoring in the London Plan Policy E7 to re-provide industrial floorspace, acceptable heights and site’s favourable location for student accommodation.
- The site is given a capacity estimate and the term ‘indicative’ sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown.

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

- The following evidence base documents have informed the site allocation:
- 2013 SHLAA, 2017 SHLAA and associated call for sites.
 - London Plan designated Opportunity Area
 - Mayor’s Housing Zone (Wembley)

<ul style="list-style-type: none"> • Brent Core Strategy (Wembley Growth Area) • Brent Local Development Framework- Site Specific Allocations 2011 • Mayor's Housing Zone • Wembley Masterplan SPD 2009 (Regeneration Area) • Wembley Area Action Plan • IIA - Site Allocation Assessments
Is the extent of each site correctly identified?
Yes, the extent of each site is correctly identified. The boundary follows the land ownership boundary, the SSA 2011, WAAP and pre-app schemes.
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.
Is the allocated site deliverable?
<p>This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, and PTAL 5. It is an underutilised site which can comprehensively deliver mixed use residential development. The entire site is considered to be built out until the end of the Plan period, however some part will to the 5 year housing land supply.</p> <p>The site is deliverable as it has come forward separately and parts of the site benefit from pre or full planning application:</p> <ul style="list-style-type: none"> • Glynn's skip hire: Pre-app • Access storage: full planning application (ref:18/4767) to be determined and half of it will be delivered 5 years. • Units 1-5 Inc, Cannon Trading Estate: Full planning permission (17/3797) on site. It is deliverable in 5 years.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
<p>Each site has a varied contextual spatial character due to its location. The site is within the core of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings. However, London Plan Policy D8 requires boroughs to define tall buildings based on local context. As such, the height should regard the lower density residential context.</p> <p>In line with this, as per part 4.25 of the strategy, the site is at the edge of Tall Buildings Zone where step down towards the Zone's edge is required to ensure an appropriate relationship with surrounding low rise context.</p>
Have all the site constraints, development mix and viability considerations been taken into account?
The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constrains alongside other relevant information. It has been concluded that the SSA's allocations

contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent’s Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA10 York House

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the regeneration area in the Wembley Masterplan SPD 2009 and it carried forward from the WAAP (Site W 9 York House).
- The criteria are relevant and consistent to the Brent School Place Strategy. Completion of Wembley Masterplan development sites will increase demand for places in primary school.
- The criteria are relevant taking into account the stakeholder representation through Reg 18/Reg 19 consultations, pre-app discussions. Planning permission (ref: 18/0204) granted permission for a primary school.
- The criteria are deliverable as this is supported through the draft London Plan Wembley OA designation, Town Centre location , Wembley GA, Tall Building Zone, IDP, Brent’s School Place Strategy, Local Plan Viability Assessment 2019.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

NA as the site will deliver a school.

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- Brent Core Strategy (Wembley Growth Area)
- Wembley Masterplan SPD 2009
- Brent’s School Place Strategy 2019
- IDP
- Wembley Area Action Plan
- London Plan designated Opportunity Area
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership boundary, WAAP and the approved hybrid planning application.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area which will increase its demand. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone (Core), Town Centre boundary, PTAL 6a. It is a vacant land used for car parking.

The site is deliverable as it benefits from planning permission (ref:18/0204) and falls within the approved hybrid planning permission (ref:15/5550).

The York House office building has a prior approval (ref: 18/2197).

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. The site's approved building height of 4 storeys responds to its requirement as a school facility.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards a need that will arise from surrounding developments. It will deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BCSA11 College of North West London Wembley

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and recognised as a development site in the SSA DPD. The site (Site W 14- Arena House and Crescent House) has been carried forward from the WAAP. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
 - The provision of mixed use development in order to address the exiting offer and its location adjacent to the town centre boundary. In line with emerging London Plan Policy SD6/SD7, Retail & Leisure Needs Study (EB_E_06) and the Plan Policy BE4 and Brent's Core Strategy for Wembley Growth Areas.
 - Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6

<ul style="list-style-type: none"> ○ The development to be sympathetic to the protected views required by the Tall Building Strategy and London Plan Policy HC3 Strategic and Local Views. ○ Adopting urban greening measures as identified in London Plan Policy D3/D6/D8/G4/G5, Plan Policy BGI1/BGI2/BH13 and Open Space Study (EB_GI_02). ○ Contribute positively towards waterside development and associated infrastructure due to the SINC Grade II Wealdstone brook in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1. • The criteria are relevant taking into account the stakeholder representation through Reg 18/Reg 19 consultations. • The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor’s Housing Zone designation for Wembley, Wembley GA, adjacent town centre location, Brent’s IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> • Whilst the 2017 SHLAA identifies this site as a ‘low probability site’, it recognised the site’s potential to develop at an Opportunity Area ‘Central’ density of 450 dph due to its PTAL of 6. This was due to the fact that the North West College was fully operating on the site. During stakeholder consultation during Reg 18/Reg 19 consultation, the land owner/developer have shown interest to relocate the college. • Taking account of the site’s area outside the Zone 3 fluvial floodplain, this provides a capacity estimate of 155. • The site is given a capacity estimate and the term ‘indicative’ sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2013 SHLAA, 2017 SHLAA and associated call for sites • London Plan designated Opportunity Area • Mayor’s Housing Zone (Wembley) • Brent Core Strategy (Wembley Growth Area) • Tall Building Zone (Core) • Wembley Masterplan SPD 2009 (Regeneration Area) • Wembley Area Action Plan

<ul style="list-style-type: none"> • Brent Local Development Framework- Site Specific Allocations DPD 2011 • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership and WAAP.
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.
Is the allocated site deliverable?
Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone (Core), adjacent to town centre boundary and PTAL 6. It is an underutilised site which can deliver mixed use residential development. The site is considered to be built out within the Plan period, however it will not contribute to the 5 year housing land supply.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
<p>Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.</p> <p>The site is within the core of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views. In addition the strategy recommends reducing building heights near to the zone's boundary outside the core. As such, the SSA identifies the height should step down towards the western side.</p>
Have all the site constraints, development mix and viability considerations been taken into account?
<p>The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.</p> <p>In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.</p>

Site allocation: BCSA12 Land to South of South Way

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site formed part of the site: WEM 32 First way in the Wembley Masterplan SPD 2009. Similarly it formed part of the W5 Wembley Eastern Lands in SSA DPD. The WAAP also recognises this site (Site W 28 First Way). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensures that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
 - Retaining the wildlife corridor and adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - Maximise re-provision of industrial floorspace to assist in meeting Brent’s industrial land needs and contamination remediation in line with London Plan policy E7.
 - In line with London Plan Policy E7/D13, incorporation of ‘Agent of change principle’ in developments with close proximity to the Wembley Business Centre.
 - Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.
 - Other requirements relate to infrastructure such as road improvements to assist in Brent’s Long Term Transport Strategy (EB_T_03).
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor’s Housing Zone designation for Wembley, Wembley GA, Tall Building Zone (Core), Brent’s IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The 2017 SHLAA identifies the Asda site as an ‘allocation’. It recognises these sites as a ‘large site capacity’ with a potential to develop at ‘Central’ density.
- The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. However, the Plan identifies a capacity as 500 factoring in the London Plan Policy E7 to re-provide industrial floorspace, surrounding densities and acceptable heights.
- The site is given a capacity estimate and the term ‘indicative’ sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020.

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is

necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- 2013 SHLAA, 2017 SHLAA and associated call for sites.
- London Plan designated Opportunity Area
- Mayor’s Housing Zone (Wembley)
- Brent Core Strategy (Wembley Growth Area)
- Brent Local Development Framework- Site Specific Allocations DPD 2011
- Wembley Masterplan SPD 2009 (Regeneration Area)
- Wembley Area Action Plan
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

Yes, the extent of each site is correctly identified. The boundary shown on the site allocation figure follows the land ownership boundary.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.

Is the allocated site deliverable?

This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone (Core). It is an underutilised site which can comprehensively deliver mixed use residential development. The site is considered to be built out until the end of the Plan period, and therefore does not contribute to the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.

The site is within the core of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views. In addition the strategy recommends reducing building heights near to the zone’s boundary outside the core. As such, the SSA identifies the close proximity to the stadium and recommending height to step down towards the eastern part.

Have all the site constraints, development mix and viability considerations been taken into account?

The council’s evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA’s allocations contributes towards housing targets, regenerating priority area, potential uplift

of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent’s Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Other site allocations

Site allocation: BCSA13 Former Malcolm House site

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is carried forward from the WAAP (Site W11 Malcolm House) and was part of the masterplan and regeneration area in the Wembley Masterplan SPD 2009. The criteria are relevant based on,
 - Supporting wider regeneration and ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
 - The provision of main town centre use in order to address the town centre location. In line with emerging London Plan Policy E9/SD6/SD7 and Brent’s Core Strategy for Wembley Growth Areas.
 - Maximise re-provision of B1 business use to assist in meeting Brent’s industrial land needs and London Plan policy E7.
 - Infrastructure upgrading such as junction improvements to assist in Brent’s Long Term Transport Strategy (EB_T_03).
 - Active frontage is required consistent with London Plan Policy D3/GG1.
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor’s Housing Zone designation for Wembley, Wembley GA, Edge of Tall Building Zone, Town Centre location, Brent’s IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- Indicative capacity is 100. WAAP (site W11) recognised the capacity to be 62. The capacity takes into account the site’s location, surrounding development and the need to re-provide B1 use and town centre use.
- The site is given a capacity estimate and the term ‘indicative’ sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020

Is the description of the site necessary to be included within the policy wording?

NA

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- London Plan designated Opportunity Area

<ul style="list-style-type: none"> • Mayor’s Housing Zone (Wembley) • Brent Core Strategy (Wembley Growth Area) • Tall Building Zone • Wembley Masterplan SPD 2009 (Regeneration Area) • Wembley Area Action Plan • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal • Local Plan review and stakeholder consultation (Reg 18/Reg 19)
Is the extent of each site correctly identified?
The boundary has been informed by land ownership, existing allocation in the WAAP and the consented scheme (ref:08/2633).
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council’s support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.
Is the allocated site deliverable?
Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone, Town Centre boundary and PTAL 5. It is an underutilised site which can comprehensively deliver mixed use development. The site is considered to be built out within the Plan period, however it does not contribute to the 5 year housing land supply.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The site is within the Tall Building Zone, and any proposal coming forward will be in line with the Tall Building Strategy.
Have all the site constraints, development mix and viability considerations been taken into account?
<p>The council’s evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA’s allocations contributes towards the town centre viability, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.</p> <p>In Addition, Brent’s Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.</p>

Site allocation: BCSA14 St Joseph’s Social Club, Empire Way
Are the criteria in the allocations policy necessary, relevant and deliverable?
<ul style="list-style-type: none"> • The site was part of the regeneration area in the Wembley Masterplan SPD 2009. The criteria are relevant based on,

<ul style="list-style-type: none"> ○ Supports housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD1/SD10 ○ The re-provision of D1 community use in order to address the exiting offer and the town centre location. In line with emerging London Plan Policy SD6/SD7/S1, Brent's Core Strategy for Wembley Growth Areas and Brent's IDP (EB_I_01) • The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley, Wembley GA, Town Centre location, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> • Indicative capacity is 60. The capacity takes into account the site's location, size, surrounding development and the need to re-provide D1 use. • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>NA</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • London Plan designated Opportunity Area • Mayor's Housing Zone (Wembley) • Brent Core Strategy (Wembley Growth Area) • Wembley Masterplan SPD 2009 (Regeneration Area) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal • Local Plan review and stakeholder consultation (Reg 18/Reg 19)
<p>Is the extent of each site correctly identified?</p>
<p>The boundary has been informed by the pre app discussions and land ownership.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Given the size of the site, the requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and comments.</p>
<p>Is the allocated site deliverable?</p>
<p>Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has PTAL 4-5 and it is within the priority regeneration area capable to redevelop and deliver homes.</p>

The site is considered to be built out within the Plan period, however it does not contribute to the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Any proposal coming forward will be in line with the Tall Building Strategy.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards the housing targets, town centre viability, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocations:

BCSA15 Site W10 Wembley Masterplan

BCSA16 Site NW04 Wembley Masterplan

BCSA18 Site W12 Wembley Park Boulevard, Wembley

Are the criteria in the allocations policy necessary, relevant and deliverable?

(to avoid repetition the sites have been put together as they are part of one masterplan)

- These sites were part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and recognised as development site in the SSA DPD (Brent Local Development Framework- Site Specific Allocations DPD 2011). The criteria have been reached through intensive master planning in line with needs assessment and policy requirement.
 - Supports housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD1/SD10
 - The provision of town centre uses and D1 use addresses the exiting offer, town centre location and the growing population. This is consistent with NPPF (Para 85/92) and with the emerging London Plan Policy SD6/SD7/S1/S3/H15 and Brent's Core Strategy for Wembley Growth Areas.
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley, Wembley GA, Town Centre location, Brent's IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. With further regards to deliverability, there is an approved outline consent (ref: 15/5550) and (ref:18/0968).

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative

only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
NA
Is the description of the site necessary to be included within the policy wording?
NA
Is the allocation justified by the evidence base?
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • London Plan designated Opportunity Area • Mayor's Housing Zone (Wembley) • Brent Core Strategy (Wembley Growth Area) • Tall Building Strategy • Wembley Town Centre • Wembley Masterplan SPD 2009 (Regeneration Area) • Wembley Area Action Plan • Brent Local Development Framework- Site Specific Allocations DPD 2011 • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal • Local Plan review and stakeholder consultation (Reg 18/Reg 19) • IDP (EB_I_01)
Is the extent of each site correctly identified?
The boundaries have been informed by the outline planning permission (ref:15/5550) and land ownership.
Are the detailed requirements for each site clear and justified?
Given the size of the site, master planning and the outline planning permission, the requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and comments.
Is the allocated site deliverable?
Yes. This sites are considered deliverable as they are in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone, Town Centre boundary and PTAL 4-6. The delivery of these sites will support the high density development in the Wembley Masterplan area. The sites have come forward from the WAAP and benefit from outline planning permission.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The sites fall within the Tall Building Zone. As such, the proposals have come forward in line with the Tall Building Strategy.
Have all the site constraints, development mix and viability considerations been taken into account?
The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constrains alongside other relevant information. It has been concluded that the SSA's allocations contributes towards the town centre viability, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent’s Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BCSA19 Wembley Park Station, Police Station and Adjacent Land Bridge Road

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is part of the masterplan area and regeneration area in the Wembley Masterplan SPD 2009 and recognised as development site in the SSA DPD (Brent Local Development Framework- Site Specific Allocations DPD 2011). The criteria are relevant based on,
 - Supporting wider regeneration and ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy SD1/SD10
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor’s Housing Zone designation for Wembley, Wembley GA, adjacent to Town Centre boundary, Brent’s IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- Indicative capacity is 60. The capacity takes into account the site’s location, size, surrounding development and the need to re-provide the police station.
- The site is given a capacity estimate and the term ‘indicative’ sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020

Is the description of the site necessary to be included within the policy wording?

NA

Is the allocation justified by the evidence base?

- The following evidence base documents have informed the site allocation:
- London Plan designated Opportunity Area
 - Mayor’s Housing Zone (Wembley)
 - Brent Core Strategy (Wembley Growth Area)
 - Brent Local Development Framework- Site Specific Allocations DPD 2011
 - Wembley Masterplan SPD 2009 (Regeneration Area)
 - Wembley Area Action Plan
 - IIA - Site Allocation Assessments
 - Tested positive through the Sustainability Appraisal
 - Local Plan review and stakeholder consultation (Reg 18/Reg 19)

Is the extent of each site correctly identified?

The boundary has been informed by land ownership.

Are the detailed requirements for each site clear and justified?

Given the small size of the site, the requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and comments.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has excellent PTAL 5/6a and within the priority regeneration area. It is an underutilised site which can comprehensively deliver mixed use residential development. The site is considered to be built out within the Plan period, however it does not contribute to the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Any proposal coming forward will be in line with the Tall Building Strategy.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards the housing target, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Matter 9 – Places (including Site Allocations)

Main Issue: Are the policies and site allocations outlined within the places section of the Plan justified, effective and consistent with national policy?

[Section 5 of the Plan]

General Questions

9.1 In relation to all of the proposed site allocations contained within 'Section 5 – Places' of the Plan: Examination of the Brent Local Plan

East Place	
Site allocation: BEGA1 - NEASDEN STATIONS GROWTH AREA	
Are the criteria in the allocations policy necessary, relevant and deliverable?	This allocation is subject to a masterplan approach. This is seen as necessary to fully utilise the site through comprehensive redevelopment, and help bring forward the maximum achievable dwellings and employment/ industrial floorspace as appropriate. The detail of this will be provided in a forthcoming masterplan, however, the allocation details the primary planning considerations, design principles and infrastructure requirements which the masterplan will need to consider. These are considered necessary, relevant and deliverable.
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?	<p>The capacity of this site is to be drawn out in a forthcoming masterplan. This will use the same methods used to identify the capacities of other site allocations within the Plan.</p> <p>The indicative capacity identified for this site allocation, within the timeframe for delivery, is 2000 units. This is considered to be a conservative estimate to help identify growth within this area prior to the delivery of a more detailed masterplan.</p> <p>The site includes a number of sites identified within the London Plan SHLAA. These included the Locally Significant Industrial Land (LSIS) to the north, and the College of Northwest London Campus to the east. The SHLAA identified a capacity of approximately 1,069 units across these sites. The indicative capacity of the remainder of the Growth Area is broadly similar to that identified by the SHLAA for these few sites. This also factors in the need to re-provide/ intensify industrial floorspace in accordance with London Plan policy E7. It also considers the need to provide the proposed West London orbital Line within its confines. Discussions with the range of landowners in association with the masterplanning work currently being undertaken indicate that the SHLAA estimates for the sites under-represent potential capacity, and as such the Council is confident the 2000 indicative target can be met over the Plan period.</p>
Is the description of the site necessary to be included within the policy wording?	It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?	

The allocation is justified on the basis of the evidence base. Some of the site was identified in the London Plan SHLAA. These have been combined due to their proximity, and expanded into the wider area as was considered appropriate due to the opportunity provided by the high PTAL associated with existing transport infrastructure and the potential new WLO station within the site unlocking density for new homes. This will provide regeneration and potential for transformative change through its allocation as a Growth Area. This will be achieved through wholesale redevelopment as guided by a forthcoming masterplan. The site scored positively against the IIA site assessment criteria.

Is the extent of each site correctly identified?

Yes

Are the detailed requirements for each site clear and justified?

The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient.

Is the allocated site deliverable?

Yes. A portion of the site has received planning permission for 121 dwellings. In addition, as part of the masterplanning process the Council has engaged with owners/developers of the College for North London, TfL Commercial and the sites between the railways accessed off Neasden Lane. All these indicated a desire to bring forward the sites for redevelopment. This shows there is good prospects for development to be delivered. The site is also expected to benefit from the proposed West London Orbital (WLO) line, which is to have a station within this Growth Area. This will increase the value of the land, allowing for higher density development, unlocking more homes. This site is to come forward via a masterplan approach. This will also provide a constructive framework for developers, increasing certainty and therefore confidence and delivery. This is consistent with SHLAA timescales for delivery for LSIS sites and London Plan policy. As such, this site is seen to be deliverable within the Plan period, although as stated within the Plan, the remaining capacity is seen as likely to come forward in the latter half of the plan period.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site allocation acknowledges the sites potential for tall buildings, and their need to step down towards adjacent 2 storey development. This is to be determined in greater detail by a forthcoming masterplan. The policy for the site reflects the conclusions of the Tall Building Strategy.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council considers that the site's constraints have been taken into account. The assessment identifies the need to re-provide industrial floorspace, that the site has a waste use that needs to be re-provided, that space will be required for the West London Orbital. The sites is identified as being in a AQMA, that the adjacent land is SINC, that the site is subject to surface water flooding that needs to be addressed, that existing roads are heavily trafficked, non-designated heritage assets are in close proximity to the eastern edge, that existing residential properties as also adjacent which the development needs

to consider in terms of heights, that the site is likely to be contaminated in part. Noise from surrounding uses such as industrial, railways and roads will need to be addressed. That the multiplicity of ownerships will mean that the landowners will have to work together to deliver necessary social infrastructure. These types of issues are not unusual in Brent, and development has successfully shown that they can be overcome. The masterplan allows for a more detailed consideration and appropriate solutions to be worked up with the landowners/site developers in advance of applications. This will provide more detail as it relates to the site constraints and development mix, and their implications on viability. The site constraint factors have also been taken into account when determining the site capacity, although this is only indicative.

Site allocation: BEGA2 - STAPLES CORNER GROWTH AREA

Are the criteria in the allocations policy necessary, relevant and deliverable?

This allocation is subject to a masterplan approach. This is seen as necessary to fully utilise the site through comprehensive redevelopment, and help bring forward the maximum achievable dwellings and employment/ industrial floorspace as appropriate. The detail of this will be provided in a forthcoming masterplan, however, the allocation details the primary planning considerations, design principles and infrastructure requirements which the masterplan will need to consider. These are considered necessary, relevant and deliverable.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The capacity of this site is to be drawn out in a forthcoming masterplan. This will use the same methods used to identify the capacities of other site allocations within the Plan.
The indicative capacity identified for this site allocation, within the timeframe for delivery, is 2200 units. This is considered to be an appropriate estimate over the site area of approximately 43 hectares to help identify growth within this area prior to the delivery of a more detailed masterplan. This factors in the need to provide a mix of uses and reprovide/ increase the quantum of industrial floorspace on site in line with London Plan Policy E7.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

The allocation is justified on the basis of the evidence base. The areas will benefit from improved public transport accessibility, consistent with the proposed opening of the Thameslink Brent Cross West station in 2022. This station is also the proposed location for the potential West London Orbital station, thus further increasing PTAL. To the east of the A5, the majority of land within this area within LB Barnet is identified as the Brent Cross Opportunity Area. There, low density poor quality industrial premises are identified for a range of intensification with residential led redevelopment. It is considered that the land in Brent essentially has the same characteristics that warrant a similar approach. Although vacancy levels are low, the area has not

benefited from significant new investment in industrial buildings for much time. Viability evidence indicates that London Plan policies to meet (increase) industrial capacity needs are unlikely to be met through industrial intensification alone. The areas closest to the Brent Cross West provide the best potential for redevelopment for vertically integrated mixed-use purposes, that will provide new homes and better quality industrial premises. Preliminary masterplan work done by GLA regeneration indicates that a pure draft London Plan policy approach of industrial led intensification to free up land for residential co-location is unviable. This points to the need for a different solution to meet floorspace requirements of the sector. The site scored positively against the IIA site assessment criteria.

Is the extent of each site correctly identified?

Yes

Are the detailed requirements for each site clear and justified?

The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient.

Is the allocated site deliverable?

Yes. A portion of the site has recently received developer interest through pre-application. This shows there is interest in the site. The site is also expected to benefit from the proposed West London Orbital (WLO) line, which is to have a station within this Growth Area. This will increase the value of the land, allowing for higher density development, unlocking more homes. I will also benefit from the adjacent Brent Cross opportunity Area development, which will include a Thameslink station adjacent to this Growth Area. Due to the sites scale, and its designation as Strategic Industrial Land (SIL), it has received interest from the GLA. They have conducted a masterplan study in an attempt to exemplify how they would like to see large scale industrial sites come forward for co-location under London Plan policy. This site is also to come forward via a masterplan approach. This will also provide a constructive framework for developers, increasing certainty and therefore confidence and delivery. As such, this site is seen to be deliverable within the Plan period, although as stated within the Plan, the remaining capacity is seen as likely to come forward in the latter half of the plan period.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site allocation acknowledges the sites potential for tall buildings, and their need to step down towards adjacent 2 storey development. This is to be determined in greater detail by a forthcoming masterplan. This allocation reflects the conclusions of the Tall Building Strategy.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council considers that the site's constraints have been taken into account. The assessment identifies the need to re-provide industrial floorspace. The site is identified as being in a AQMA, that the adjacent land to the north is a SSSI, that the site is subject to surface water flooding that needs to be addressed, that existing roads are heavily trafficked, designated heritage assets are within the site and in close proximity to the western edge, that

existing residential properties as also adjacent which the development needs to consider in terms of heights, that the site is likely to be contaminated in part. Traffic movement is a significant barrier to pedestrian movement that needs to be better addressed. To create an acceptable residential environment noise issues will need to be addressed. That the multiplicity of ownerships will mean that the landowners will have to work together to deliver necessary social infrastructure. These types of issues are not unusual in Brent, and development has successfully shown that they can be overcome. The allocation takes account of viability evidence and seeks to positively address the need for industrial space, which evidence indicates is unlikely to be viable without enabling development, whilst meeting new housing need. The masterplan allows for a more detailed consideration and appropriate solutions to be worked up with the landowners/site developers in advance of applications. The anticipated delivery timescale allows for this to be done properly. This masterplanning will provide more detail as it relates to the site constraints and development mix, and their implications on viability. The site constraint factors have also been taken into account when determining the site capacity, although this is only indicative.

Site allocation: BESA1 - COOMBE ROAD

Are the criteria in the allocations policy necessary, relevant and deliverable?

The site currently contributes buildings of poor design which lack integration with the surrounding character. The allocation therefore outlines the broad design considerations which should be considered as part of any planning application as is necessary. It also stipulates certain standard considerations, including that of flooding and ground contamination/ remediation. The site is currently used for industrial and commercial purposes, although part now has consent for mixed use residential/industrial development. Applicants will therefore need to demonstrate how development will intensify industrial floorspace in line with London Plan policy E7. This is necessary to assist the Council and the wider London area to meet industrial floorspace targets. Other requirements relate to infrastructure, and the need to assist in the improvement of local public transport systems, and liaise with Thames Water at an early stage to ensure capacities are sufficient to allow the proposed development. These requirements are in accordance with other policies within the Plan, and are considered necessary and relevant to the desired development outcome on this site.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

Indicative capacity is 196. This factors in the need to reprovide/ intensify employment and industrial land respectively, in line with London Plan policy E7. This is in addition to the heights identified as appropriate within the Design Principles section.

This site was identified in the London Plan SHLAA. This identified a capacity of 159 units. This takes into account the need to reprovide/ intensify industrial uses in line with London Plan policy E7. The site as identified includes approximately 25% more land than the SHLAA sites. This together with the density of the recent consent 18/2984 210 dph applied to the wider site of 1.3

hectares indicates the indicative capacity is appropriate taking account of site constraints (fluvial flooding). This was seen as appropriate to allow for more comprehensive redevelopment of adjacent low density uses.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
The allocation is justified on the basis of the evidence base. This site is an amalgamation of sites identified in the London Plan SHLAA. These have been combined due to their proximity, with some adjacent industrial land of similar type being included also to maximise land utilisation and ensure more comprehensive regeneration. A portion of the site has also received planning permission, a site owner for another site has approached the Council about its potential redevelopment, showing that there is appetite for development in this area, and that commercial/industrial ground floors consistent with industrial re-provision policy requirements can be delivered on lower floors with residential above. The site scored positively against the IIA site assessment criteria.
Is the extent of each site correctly identified?
Yes
Are the detailed requirements for each site clear and justified?
The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient.
Is the allocated site deliverable?
Yes. A portion of the site already has planning permission for 42 dwellings. This application is also delivering industrial floorspace alongside these dwellings. Residential and industrial floorspace delivery simultaneously can therefore be considered deliverable. The site is also located in an area of relatively high PTAL (3) on part of the primary road network. It is not considered that this site will all be built out until the end of the Plan period, although the current consent will contribute towards the 5 year supply.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The design principles proposed building heights up to 5 storeys may be appropriate, assuming there is a sympathetic step down to the existing residential. This is seen as appropriate given the sites location on a wide road to the south, River Brent to the west, Canal Feeder to the east, and 4 storey residential blocks to the north.
Have all the site constraints, development mix and viability considerations been taken into account?
The Site Allocation stipulates the necessary planning considerations, including flooding, land contamination, infrastructure provision, tree retention, design considerations, indicative housing capacity and the need to re-provide/intensify the site for industrial land uses. The implications of these considerations have been considered together holistically. The Brent Viability Assessment has investigated the viability of a multitude of different site

typologies, include those where industrial floorspace needs to be provided in accordance with London Plan policy E7. In each case the assessment has proven the majority of sites to be viable and therefore deliverable.

Site allocation: BESA2 - CRICKLEWOOD BUS DEPOT EDGWARE ROAD

Are the criteria in the allocations policy necessary, relevant and deliverable?

The site occupies a plot segregated from its surroundings by railway lines, whilst its frontage is along a heavily trafficked road. The site has varied topography to the north and south, and requires the delivery of non-residential floorspace and associated active frontage along the Edgware Road. The allocation therefore outlines the broad design considerations which should be considered as part of any planning application as is necessary. It also stipulates certain standard considerations, including that of flooding and ground contamination/ remediation. The site is currently occupied by a bus depot operated by Metroline providing bus services for TfL. This depot will need to be retained on site in accordance with TfL requirement, unless it can be delivered in an alternative nearby site or is no longer required. If no longer required, applicants will need to demonstrate how development will intensify industrial floorspace in line with London Plan policy E7. This is necessary to assist the Council and the wider London area to meet industrial floorspace targets whilst utilising a limited appropriate stock of land. Other requirements relate to infrastructure, and the need to assist in the improvement the adjacent public realm, and liaise with Thames Water at an early stage to ensure capacities are sufficient to allow the proposed development. To allow for residential, an additional access road may need to be provided. These requirements are in accordance with other policies within the Plan, and are considered necessary and relevant to the desired development outcome on this site.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

Indicative capacity is 202. The site due to its location on Edgware Road, which can accept greater height, can be developed at a greater density than the density matrix 145 dph urban PTAL 3 location indicates possible, but is considered this is realistic as it factors in the need to reprovide the existing bus depot/industrial space and set development back from the railways. The site was identified in the London Plan SHLAA, albeit as a low probability site.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

The site is considered justified by the evidence base. As proposals at Alperton bus depot show, Metroline will be willing to redevelop their sites subject to alternative provision of bus depot facilities being provided. The site also scored positively against the IIA site assessment criteria.

Is the extent of each site correctly identified?

Yes

Are the detailed requirements for each site clear and justified?

The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient.

Is the allocated site deliverable?

Yes. A similar application at a bus depot in Alperton is going through the planning process. This sees the relocation of the existing facility in a nearby location, leaving the existing site for industrial/ residential co-location. This demonstrates the ability for such sites to come forward, and the flexibility of TfL in ensuring capacity is met elsewhere in the interim. The site also has relatively good PTAL (3) being positioned along a key access road into central London. It is located within close proximity to essential infrastructures, including schools, healthcare, amenities and green space. It is also currently used to a low intensity when taking account of its location and could facilitate the delivery of residential also. The area adjacent, including in Barnet which is identified as an opportunity area, is subject to considerable developer interest. It is not considered that this site will be built out until towards the end of the Plan period.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The design principles proposed building heights up to 5 storeys may be appropriate, assuming there is a sympathetic step down to the existing residential. This is seen as appropriate given the site's location on a wide road to the east, and railways/ buffers to the north, south and west.

Have all the site constraints, development mix and viability considerations been taken into account?

The Site Allocation stipulates the necessary planning considerations, including flooding, land contamination, infrastructure provision, tree retention, design considerations, indicative housing capacity and the need to reprovide the existing bus depot on site. The implications of these considerations have been considered together holistically. The Brent Viability Assessment has investigated the viability of a multitude of different site typologies, including those where industrial floorspace needs to be provided in accordance with London Plan policy E7 which this site essentially requires. In each case the assessment has proven the majority of sites to be viable and therefore deliverable.

Site allocation: BESA3 - 5 Blackbird Hill

Are the criteria in the allocations policy necessary, relevant and deliverable?

This site is within the 'Other Site Allocations' table. It therefore does not contain the detailed requirements which the full site allocation policies include. The primary requirement is for a D1 community use to be reprovided on site. The site has been identified as it is currently vacant with the previous school building demolished. This can only be made possible through co-location with residential.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The sites indicative capacity was identified as 30 units. This takes into consideration its urban location in a PTAL 3 generating a density of 145 dph. Whilst the Blackbird Road frontage would promote the potential for a higher density (central) development, the need to reprovide the community use on the ground floor meant this capacity was considered justified. Nevertheless, the site is currently subject to a planning application for 57 dwellings which will be reflected in the trajectory/allocation
Is the description of the site necessary to be included within the policy wording?
The site has no description within the policy wording.
Is the allocation justified by the evidence base?
This site is justified by the evidence base. The site was sold once the existing school closed down and offered as a development opportunity. The existing owner has demolished the school and is looking to development the site, having submitted a planning application 20/2096 with proposals for a mix of uses including community and residential. This demonstrates the appetite for the delivery of this site, and the ability of the site to meet policy requirements.
Is the extent of each site correctly identified?
Yes
Are the detailed requirements for each site clear and justified?
This site allocation does not have any detailed requirements, other than that it should come forward for residential development and provide for a community use. This is proportionate given the size of the site, and is considered to be clear.
Is the allocated site deliverable?
Yes. This site has received developer interest and is currently going through the planning process for redevelopment including community uses on the ground floor, and residential above. It has been purchased by the developer, and cleared ready for development. It is therefore considered to be available now, in a suitable location, with a realistic prospect of coming forward within the next 5 years. As such, it is included within the 5 year housing land supply.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
This SSA is not within a Tall Building Zone, and does not specify appropriate heights. This is therefore in line with the Tall Building Strategy.
Have all the site constraints, development mix and viability considerations been taken into account?
This is within the 'Other Site Allocations' table, and therefore includes fewer details and requirements. The delivery of the site will be subject to the policies within the Plan. These considerations will be worked through in detail at application stage. The Brent Viability Assessment has investigated the viability of a multitude of different site typologies, include those where community uses need to be retained. In each case the assessment has proven the majority of sites to be viable and therefore deliverable.

Matter 9 – Places (including Site Allocations)

Main Issue: Are the policies and site allocations outlined within the places section of the Plan justified, effective and consistent with national policy?

[Section 5 of the Plan]

General Questions

9.1 In relation to all of the proposed site allocations contained within 'Section 5 – Places' of the Plan: Examination of the Brent Local Plan

North Place	
Site allocation: BNSA1 - CAPITOL WAY VALLEY	
Are the criteria in the allocations policy necessary, relevant and deliverable?	This allocation is subject to a masterplan approach. This is seen as necessary to fully utilise the site through comprehensive redevelopment, and help bring forward the maximum achievable dwellings and employment/ industrial floorspace as appropriate. The detail of this will be provided in a forthcoming masterplan, however, the allocation details the primary planning considerations, design principles and infrastructure requirements which the masterplan will need to consider. These are considered necessary, relevant and deliverable.
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?	The capacity of this site is to be drawn out in a forthcoming masterplan. This will use the same methods used to identify the capacities of other site allocations within the Plan. The indicative capacity identified for this site allocation, within the timeframe for delivery, is 1100 units (in accordance with proposed mod ref MM93). This is considered to be a reasonable estimate to help identify growth within this area prior to the delivery of a more detailed masterplan. The site has a minded to approved permission for 501 dwellings, the SHLAA identified delivery of 340 dwellings on the remainder of the LSIS in the Plan period, whilst the Mercedes car dealership site and Asda have the potential to accommodate well above the remaining 160 dwellings. For example the Mercedes garage has the same site area as TRQ adjacent which delivered 460 homes. Taken as a whole, the capacity also provides the opportunity across the allocation for any necessary community infrastructure to be incorporated.
Is the description of the site necessary to be included within the policy wording?	It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?	The allocation is justified on the basis of the evidence base. Development on the adjacent TRQ site and a minded to approve application for 501 dwellings indicate strong developer interest in the area and that commercial/industrial ground floors consistent with industrial reprovision policy requirements can be delivered on lower floors with residential above. The LSIS sites were identified in the London Plan SHLAA as potential development. The Mercedes garage has been subject to an existing allocation and the site owners have indicated a

willingness to develop the site (as identified in their Regulation 20 representation). The site scored positively against the IIA site assessment criteria. The allocation is therefore seen to be justified by the evidence base.

Is the extent of each site correctly identified?

Yes

Are the detailed requirements for each site clear and justified?

The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient for masterplanning purposes. Matters include the need to co-locate/re-provide/intensify the existing industrial uses, that in association with the mix of uses and proximity to Edgware Road that noise needs to be addressed, that the site is acceptable for tall buildings that need to step down towards the edges, that public realm/movements need to be considered to ensure no conflict between users, including improvements to Edgware Road, that existing (Grove Park) open space SINC needs to be respected and new open space need to be provided, that junction improvements may be required, that the site is subject to some surface water flooding and that air quality needs to be addressed.

Is the allocated site deliverable?

Yes. A portion of this site has a minded to approve full planning application for 501 units. This together with delivery on adjacent sites, representations received in relation to the site allocation and pre-application developer interest gives a strong indication that the allocation is deliverable over the Plan period. This site is to come forward via a masterplan approach. This is consistent with SHLAA timescales for delivery for LSIS sites and London Plan policy. The masterplan will provide a constructive framework for developers, increasing certainty and therefore confidence and delivery.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

SSA states heights need to step down toward 2 storey character surrounding the site, and that heights will be outlined within a forthcoming masterplan. This is consistent with the Tall Building Strategy which requires buildings to step down toward existing character outside of the site. This is reflected by the identification of the zone's core and wider area.

Have all the site constraints, development mix and viability considerations been taken into account?

This site is subject to a masterplan. This will provide more detail as it relates to the site constraints and development mix, and their implications on viability. The policy identifies the main constraints, including: the need to co-locate/re-provide/intensify the existing industrial uses, that in association with the mix of uses and proximity to Edgware Road that noise needs to be addressed, that the site is acceptable for tall buildings that need to step down towards the edges, that public realm/movements need to be considered to ensure no conflict between users, including improvements to Edgware Road, that existing (Grove Park) open space SINC needs to be respected and new open space need to be provided, that junction improvements may be required, that the site is subject to some surface water flooding and that air quality

needs to be addressed. These factors have also been taken into account when determining the site capacity, although this is only indicative.

Site allocation: BNSA2 - COLINDALE RETAIL PARK, MULTI-STOREY CAR PARK AND SOUTHON HOUSE

Are the criteria in the allocations policy necessary, relevant and deliverable?

This allocation is subject to a masterplan approach. This is seen as necessary to fully utilise the site through comprehensive redevelopment, and help bring forward the maximum achievable dwellings and employment/ industrial floorspace as appropriate. The detail of this will be provided in a forthcoming masterplan, however, the allocation details the primary planning considerations, design principles and infrastructure requirements which the masterplan will need to consider. These are considered necessary, relevant and deliverable.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The capacity of this site is to be drawn out in a forthcoming masterplan. The indicative capacity identified for this site allocation is 500 units. This reflects the density assumptions for the site consistent with its SHLAA assessment PTAL 2-3 and a central typology due to its proximity to existing tall buildings and an opportunity area of 210 dph, and the potential to re-provide all the commercial uses, plus be consistent with industrial land re-provision.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

The north portion of the site was subject to an existing Local Plan (SSA B/C2) allocation, but as yet not subject to redevelopment. Large out of town retail is becoming less attractive to occupiers and more viable for other uses. The southern part is consistent with the characteristics of other large single storey occupiers along the Edgware Road in both Brent and LB Barnet with extensive vehicle parking. These are being brought forward for development with higher density mixed use schemes. The site also scored positively against the IIA site assessment criteria. The allocation is therefore seen to be justified by the evidence base.

Is the extent of each site correctly identified?

Yes

Are the detailed requirements for each site clear and justified?

The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient. These include the acceptability of the site for tall buildings, subject to stepping down to the edges, crating active frontage along Edgware Road, retaining existing trees where possible, location within an AQMA, potential for

contamination, need for some car parking on site, a transport assessment to address impact on the network and in relation to potential flooding from ground water and sewers, whilst the topography needs to be considered in how to successfully develop the site, particularly in relation to height of buildings and connecting through to existing developments.

Is the allocated site deliverable?

Yes. This site has recently received development interest from multiple parties looking at sites individually and as a whole. This indicates that the capacity on site is realistic when taking account of being policy compliant in terms of replacement non-residential floorspace. The site also received representations from owners during the Local Plan consultation. This site is to come forward via a masterplan approach. This will provide a constructive framework for developers, increasing certainty and therefore confidence and delivery. As such, this site is seen to be deliverable within the Plan period, although as stated within the Plan, this is not anticipated to contribute toward the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

SSA states heights need to step down toward 2 storey character surrounding the site, and that heights will be outlined within a forthcoming masterplan. This is consistent with the Tall Building Strategy which requires buildings to step down toward existing character outside of the site. This is reflected by the identification of the zone's core and the wider zone.

Have all the site constraints, development mix and viability considerations been taken into account?

This site is subject to a masterplan. This will provide more detail as it relates to the site constraints and development mix, and their implications on viability. These factors have also been taken into account when determining the site capacity, although this is only indicative.

Site allocation: BNSA3 - QUEENSBURY LSIS AND MORRISONS

Are the criteria in the allocations policy necessary, relevant and deliverable?

This allocation is subject to a masterplan approach. This is seen as necessary to fully utilise the site through comprehensive redevelopment, and help bring forward the maximum achievable dwellings and employment/ industrial floorspace as appropriate. The detail of this will be provided in a forthcoming masterplan, however, the allocation details the primary planning considerations, design principles and infrastructure requirements which the masterplan will need to consider. These are considered necessary, relevant and deliverable.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The capacity of this site is to be drawn out in a forthcoming masterplan. This will use the same methods used to identify the capacities of other site allocations within the Plan.

The indicative capacity identified for this site allocation is 383 units. This is considered to be an appropriate estimate to help identify growth within this area prior to the delivery of a more detailed masterplan. The north and south

portions of the site, which are Locally Significant Industrial Land (LSIS), were identified in the London Plan SHLAA. This together with all the Morrisons site identified a capacity of 562 dwellings based on a density of 145 dph in a PTAL 3 urban location. The capacity figure has been amended to take a cautious approach to the need to reprovide the supermarket which is trading well, and reprovide/ intensify the industrial land in accordance with London Plan policy E7. This is considered appropriate at this stage, with a forthcoming masterplan to provide a more detailed figure.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

The north and south portions of the site, which are Locally Significant Industrial Land (LSIS), were identified in the London Plan SHLAA. These have been added onto existing SSA 16 which included the Morrisons superstore. The site has already received significant interest and was recently subject to planning permission for 194 dwellings on part of the Morrisons car park which has now commenced. The proximity to Queensbury station (all of the allocation within 400 metres) is generating interest in the area. This has also recently delivered 149 dwellings to the south of Morrisons, in a high quality scheme incorporating some employment uses. The allocation is therefore seen to be justified by the evidence base.

Is the extent of each site correctly identified?

Yes

Are the detailed requirements for each site clear and justified?

The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient. The allocation is clear about the need to masterplan with a view to providing additional residential development whilst taking account of the need to re-provide/increase industrial, the retention of/re-provision of supermarket retail, but not additional, the need of the development to take account of the proximity of SINCs, flooding risks, contamination, air quality, noise from the industrial and railways, the bus layover function, heights of buildings and potential impact on the movement network, particularly Honeypot Lane.

Is the allocated site deliverable?

Yes. A portion of this site has full planning permission for 194 units which has started. This gives a strong indicator of developer interest in the area and the strong likelihood over the Plan period that the remainder of the site is also deliverable. This site is to come forward via a masterplan approach. This will also provide a constructive framework for developers, increasing certainty and therefore confidence and delivery. As such, this site is seen to be deliverable within the Plan period, although as stated within the Plan, the remainder of this site is not anticipated to contribute toward the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

This site is not within a Tall Building Zone. The allocation states that up to 6 storeys may be appropriate, but development should step down to the surrounding context. The height in the area is varied with more recent development of 5 storeys adjacent on Honeypot Lane. Appropriate heights will be drawn out in a forthcoming masterplan.

Have all the site constraints, development mix and viability considerations been taken into account?

This site is subject to a masterplan. This will provide more detail as it relates to the site constraints and development mix, and their implications on viability. The allocation takes account of the need to re-provide/increase industrial, the retention of/re-provision of supermarket retail, but not additional, the need of the development to take account of the proximity of SINCs, flooding risks, contamination, air quality, noise from the industrial and railways, the bus layover function, heights of buildings and potential impact on the movement network, particularly Honeypot Lane. These factors have also been taken into account when determining the site capacity, although this is only indicative.

Site allocation: BNSA4 - Former Mecca Bingo Site

Are the criteria in the allocations policy necessary, relevant and deliverable?

The existing building on this site is Grade II listed. The allocation therefore highlights the need to retain and enhance the heritage of this structure, but acknowledges the potential need to develop above and to the side in order to improve scheme viability. This is seen as necessary and relevant in order to enhance deliverability whilst retaining heritage value. With a high PTAL, and in a town centre location, it is also specified to come forward car-free and with an active ground floor frontage. This is seen as necessary to ensure a sustainable, well-integrated scheme is delivered which will enhance town centre vitality. These requirements are in accordance with other policies within the Plan which have been tested within the Brent Viability Assessment and proven to be viable in most cases.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The capacity for this site has not been identified. The site is a listed heritage asset and will require innovative design to retain the buildings character whilst ensuring scheme viability. It was therefore not considered appropriate, or possible to provide an indicative capacity which may be unrealistic using standard assumptions of densities.

The capacity of the site is listed as 0 in the site allocation. Therefore the site does not officially contribute toward the housing delivery over the Plan period. Having said that it is currently subject to a planning application for a communal living scheme that will deliver the equivalent of 50 dwellings.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

The site forms part of existing Local Plan site allocation B/C4. The site has been reduced to omit now redeveloped portions of the existing SSA. The Bingo Hall is Grade II listed, and is on Historic England's Buildings at Risk Register as it is currently vacant without capacity for maintenance. If the existing listed building is to be saved and restored, it will need significant investment. The site also scored positively against the IIA site assessment criteria. The site is therefore seen to be justified by the evidence base.

Is the extent of each site correctly identified?

Yes

Are the detailed requirements for each site clear and justified?

The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient. The allocation focuses on the building's special characteristics that need careful consideration/incorporation in any scheme, the desire to if possible create an active frontage, the potential for a car free development and the retention of existing trees.

Is the allocated site deliverable?

Yes. An application has been made for a mixed use scheme to bring forward 127 shared living dwellings. Therefore interest for the site exists, and it is considered deliverable.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

This SSA is not within a Tall Building Zone, and does not specify appropriate heights. It is within a town centre, so there might be some justification for going above the equivalent of 5 storeys.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council recognises this sites significant constraints, and its implications on viability. The allocation is therefore flexible in its requirements, stating that 'it is accepted that to make a scheme viable, new build on top and to the side may be the only option. Some subdivision of the auditorium may also be necessary. Proposals for the building should be carefully considered with its significance in mind within an options and viability appraisal for the site.' This is considered sufficient and justified in order to help see the site come forward for delivery.

Site allocation: BNSA5 - Former Kingsbury Library and Community Centre

Are the criteria in the allocations policy necessary, relevant and deliverable?

This site is within the 'Other Site Allocations' table. It therefore does not contain the detailed requirements which the full site allocation policies include. The two requirements included are for the retention of the existing pupil referral unit, and the community led use. The site has been identified due to the need to renew these services. This can only be made possible through co-location with residential.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative

only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
Indicative capacity is 27. This has been carried forward from the existing Plan (8. Former Kingsbury Library and Community Centre). It is broadly consistent with the SHLAA which identified 30 dwellings, (urban PTAL 3 density 145 dph) taking account of the net potential of the site. The capacity takes into account the need to retain the existing community uses.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
This allocation has been carried forward from the existing Plan (8. Former Kingsbury Library and Community Centre). The Council's property team have indicated that it is likely to come forward over the lifetime of the Plan. The site also scored positively against the IIA site assessment criteria. The site is therefore seen to be justified by the evidence base.
Is the extent of each site correctly identified?
Yes
Are the detailed requirements for each site clear and justified?
The site currently includes community uses. To support the enhancement of these uses, the site will need to see residential come forward also. Commentary on the site is very concise, and is considered to be clear and justified.
Is the allocated site deliverable?
Yes. The site is owned by the Council. This gives the Council more control in terms of delivering the Council's aspirations for the site. This is sufficient to consider the site deliverable in planning terms.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
This SSA is not within a Tall Building Zone, and does not specify appropriate heights.
Have all the site constraints, development mix and viability considerations been taken into account?
This is within the 'Other Site Allocations' table, and therefore includes fewer details and requirements. The delivery of the site will be subject to the policies within the Plan. These considerations will be worked through in detail at application stage. The Brent Viability Assessment has investigated the viability of a multitude of different site typologies, include those where community uses need to be retained. In each case the assessment has proven the majority of sites to be viable and therefore deliverable.

Site allocation: BNSA6 - Ex-Volkswagen Garage
Are the criteria in the allocations policy necessary, relevant and deliverable?
This site is within the 'Other Site Allocations' table. It therefore does not contain the detailed requirements which the full site allocation policies include. This particular site does not include any further guidance on how the site is expected to come forward. The delivery of the site will be guided by the suite

of policies within the Local Plan, and London Plan as appropriate. Allocation of the site helps show the Councils support for its delivery for residential development, and at what approximate density. This will encourage development on site, increasing its deliverability.
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
Indicative capacity is 28. The site was identified in the London Plan SHLAA for 45 units. (Urban PTAL 2 = 145 dph). This did not take account of the fact that as a Local Employment Site given Brent's industrial floorspace needs it will have to re-provide this floorspace. As such the indicative capacity in the allocation is considered appropriate.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
This site was identified in the London Plan SHLAA. The site also scored positively against the IIA site assessment criteria. The site is therefore seen to be justified by the evidence base.
Is the extent of each site correctly identified?
Yes
Are the detailed requirements for each site clear and justified?
This site allocation does not have any detailed requirements, other than that it should come forward for residential development to contribute to Brent's housing target. As an existing local employment site it will have to re-provide existing employment floorspace on site or 0.65 whichever is the greater. It could be appropriate to make this clearer in the policy, given its requirement on other sites.
Is the allocated site deliverable?
Yes. The site is currently poorly utilised, primarily consisting of surface car parking/display of cars for sale. Its location along Edgware Road allows for potential for greater intensity of development including residential, although its low PTAL means it is not suitable for very high density development. For these reasons the site is considered deliverable however, as the site has not been subject to recent discussions with the site owners on potential development schemes, it will not be included within the Council's 5 year land supply.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
This SSA is not within a Tall Building Zone, and does not specify appropriate heights.
Have all the site constraints, development mix and viability considerations been taken into account?
This is within the 'Other Site Allocations' table, and therefore includes fewer details and requirements. The delivery of the site will be subject to the policies within the Plan. These considerations will be worked through in detail at application stage. The Brent Viability Assessment has investigated the viability

of a multitude of different site typologies. In each case the assessment has proven the majority of sites to be viable and therefore deliverable.

Site allocation: BNSA7 - Kingsbury Trade Centre

Are the criteria in the allocations policy necessary, relevant and deliverable?

This site is within the 'Other Site Allocations' table. It therefore does not contain the detailed requirements which the full site allocation policies include. It is stipulated that the existing employment floorspace should be retained. This is important to deliver sustainable development which includes a mix of employment opportunities for local residents. The site is located within an area of Archaeological Importance which is flagged up within the comments, and requires consideration and the undertaking of appropriate assessments. This is considered necessary.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

No indicative capacity figure has been identified for this site. The site is within an area of Archaeological Importance. Therefore it is not possible at this stage to identify a capacity figure as it may be highly compromised by the presence of archaeological findings.

For the reasons outlined above, this site was not considered appropriate to include within the Housing Trajectory. The London Plan SHLAA identified the capacity as 39, however, this included a slightly larger area including an adjacent restaurant than is being taken forward in the allocation.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

A larger site was identified in the London Plan SHLAA, which is why initially this site was identified as a potential allocation in the draft Plan. An adjacent restaurant was removed from the site as it is trading well. Taking account of the limited detail that can be provided in the policy related to the site's capacity, the fact that the site is under 0.25 hectares and the lack of the site being promoted, on reflection it is considered appropriate to recommend that this site is no longer identified as an allocation in the Plan. Any applications on site can be dealt with taking account of the policies within the Plan, such as the small sites policy and the need to reprovide employment floorspace.

Is the extent of each site correctly identified?

Yes

Are the detailed requirements for each site clear and justified?

The allocation stipulates that the employment floorspace will need to be replaced. Commentary on the site is very concise, and is considered to be clear and justified.

Is the allocated site deliverable?

Yes. The site is currently poorly utilised, primarily consisting of level parking with some single storey structures. This represents a low existing use value. The site is well located on the primary road network with a relatively high PTAL in an existing residential area. For these reasons the site is considered

deliverable, however, due to the site being in an area of Archaeological important, this site does not contribute toward the boroughs Housing Trajectory.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

This SSA is not within a Tall Building Zone, and does not specify appropriate heights.

Have all the site constraints, development mix and viability considerations been taken into account?

This is within the 'Other Site Allocations' table, and therefore includes fewer details and requirements. The delivery of the site will be subject to the policies within the Plan. These considerations will be worked through in detail at application stage. The Brent Viability Assessment has investigated the viability of a multitude of different site typologies. In each case the assessment has proven the majority of sites to be viable and therefore deliverable.

Site allocation: BNSA8 - Queensbury Underground Station Car Park

Are the criteria in the allocations policy necessary, relevant and deliverable?

This site is within the 'Other Site Allocations' table. It therefore does not contain the detailed requirements which the full site allocation policies include. The site will need to provide active frontage along the ground floor of Turner Road, as is best design practice to reduce anti-social behaviour by increasing passive surveillance. As the site is the car park of LUL station, some of the parking spaces need to be retained to those with a disability. This was guided by discussions with TfL and is therefore considered necessary and relevant.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

Indicative capacity 36. This is based on SHLAA Urban PTAL 4 - 225 dph (assumed 0.2 site area = 45 dwellings over 5 floors, then subtract the ground floor for parking) = 36 dwellings.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

This site was included within the London Plan SHLAA and identified by the landowners (TfL commercial) as being deliverable. The site also scored positively against the IIA site assessment criteria. The site is therefore seen to be justified by the evidence base.

Is the extent of each site correctly identified?

Yes

Are the detailed requirements for each site clear and justified?

Development should have an active frontage to increase the feeling of safety as is best design practice. Some parking will need to be replaced on site to serve the station. These are both considered justified. This is written clearly and concisely.

Is the allocated site deliverable?

The site was recommended by the owners, TfL commercial, who have expressed an interest in the site being developed. The site is therefore considered deliverable within the Plan period.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

This SSA is not within a Tall Building Zone, and does not specify appropriate heights.

Have all the site constraints, development mix and viability considerations been taken into account?

This is within the 'Other Site Allocations' table, and therefore includes fewer details and requirements. The delivery of the site will be subject to the policies within the Plan. When taking account of the site's location, ability to deal with surface water issues, re-provision of some car parking and potential density of development, the site is considered viable. TfL commercial have made no representation that as allocated policy requirements will make the site not viable.

Matter 9 – Places (including Site Allocations)

Main Issue: Are the policies and site allocations outlined within the places section of the Plan justified, effective and consistent with national policy?

[Section 5 of the Plan]

General Questions

9.1 In relation to all of the proposed site allocations contained within 'Section 5 – Places' of the Plan: Examination of the Brent Local Plan

North West Place	
Site allocation: BNWGA1 - Northwick Park Growth Area	
Are the criteria in the allocations policy necessary, relevant and deliverable?	This allocation is subject to a masterplan approach. This is seen as necessary to fully utilise the site through comprehensive redevelopment, and help bring forward the maximum achievable dwellings and employment/ industrial floorspace as appropriate. The detail of this will be provided in a forthcoming masterplan, however, the allocation details the primary planning considerations, design principles and infrastructure requirements which the masterplan will need to consider. These are considered necessary, relevant and deliverable.
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?	The indicative capacity for this site has been identified as 2600 net increase. This has been guided by the pre-applications for outline permission which have been made on the site. This has considered the amount of the site being brought forward for development, heights, relationship with the MOL and on site infrastructure and greenspace provision. The allocation states that a more detailed figure will come forward in a forthcoming masterplan. Therefore this approach is considered appropriate.
Is the description of the site necessary to be included within the policy wording?	It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?	The site is identified in the London Plan SHLAA. The site is being brought forward to help meet Brent's housing target, but also to assist stakeholders to fund the enhancement of existing on-site infrastructure. This includes the Hospital, and the University facilities. The site also scored positively against the IIA site assessment criteria. The site is therefore seen to be justified by the evidence base.
Is the extent of each site correctly identified?	Yes
Are the detailed requirements for each site clear and justified?	The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified

further in the Justification field. These are seen to be relevant and sufficient. They incorporate the need to not compromise the adjacent MOL, re-provision of existing affordable dwellings, being acceptable for tall buildings, but needing to step down and also consider impacts on views from Harrow and on aviation. Existing greenspace needs to be re-provided, need to ensure existing ball sports are not compromised on adjacent sites, that existing ecological assets are not harmed, that the site is in an AQMA, junction improvements required on Watford Road, improvements to public transport infrastructure required, e.g. step free access to station and to address surface water flooding matters.

Is the allocated site deliverable?

Yes. The site is available now, in a suitable location, and has a realistic prospect of delivery within the Plan period. The site is coming forward under the One Public Estate scheme, with the Council as partner (part land owner). A hybrid application has recently been made for the majority of the site. This includes an outline permission for the wider site, full planning permission for the mixed use first phase, and a full application for the necessary road which is to be funded by the Housing Infrastructure Fund. This is yet to be determined. This shows that the site has interest, and that all parties involved are working together under an established scheme to maximise the utility of the site. The site is therefore considered to be deliverable.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is included within Northwick Park Tall Building Zone. The SSA states that there is potential for some tall buildings, and that they should respond to the heights of the existing buildings on site, and step down toward the adjacent Metropolitan Open Land (MOL). Consideration of locally protected views, and the operational requirements of RAF Northolt will also be needed. This will be determined by a forthcoming masterplan. This is seen to reflect the recommendations of the Tall Building Strategy.

Have all the site constraints, development mix and viability considerations been taken into account?

This site is subject to a masterplan. This will provide more detail as it relates to the site constraints and development mix, and their implications on viability. These factors have also been taken into account when determining the site capacity, although this is only indicative.

Site allocation: BNWSA1 - KENTON ROAD SAINSBURY'S AND ADJOINING LAND

Are the criteria in the allocations policy necessary, relevant and deliverable?

This site allocation includes a range of relevant planning and design considerations, which are considered necessary and relevant. Specifically, the allocation states the need to retain a supermarket on site as it currently acts as a significant anchor for Kenton town centre. The entrance should however ideally be repositioned to better integrate it with the town centre, and improve its frontage. Other requirements regard the existing road layout, the need to address potential noise and vibration from the railways and improvements to nearby greenspace as would support the sustainable development of the site.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative

only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
The site was identified in the SHLAA with its capacity reflecting its town centre location and PTAL 4-5 generating 260 dph or around 450 dwellings. Whilst this could potentially happen, as the site is trading well, it is considered more likely that part of the car park which is obviously under-used will be released for development, which is reflected in the policy's capacity.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
This site is being carried forward from the existing Local Plan (13 Sainsbury's Superstore). The site also scored positively against the IIA site assessment criteria. The site is therefore seen to be justified by the evidence base.
Is the extent of each site correctly identified?
Yes
Are the detailed requirements for each site clear and justified?
The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient.
Is the allocated site deliverable?
Yes. The site is well located within Kenton town centre, and in a high PTAL location (4/5). The site includes significant parking, beyond that which is required which makes poor utilisation of the land. The supermarket is nevertheless trading well, so is unlikely to become fully available for development in the short term, pointing to a much more likely release of some of the car park, which has no significant constraints that would act as an impediment to delivery. Recent planning permissions within the borough indicate that at the least development of excess car parking is attractive to supermarkets, e.g. Morrisons Queensbury.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
This site is not within a Tall Building Zone, but within a town centre. The allocation states that up to 5 storeys may be appropriate, but development should step down to the surrounding context.
Have all the site constraints, development mix and viability considerations been taken into account?
The allocation includes consideration of all relevant site constrains. These include the need to consider the prevailing height of the area, flooding potential, and proximity to the railway/ wildlife corridor. It also considers the development mix, requiring a supermarket to be reprovided on site and the need for associated parking. These have been factored into the capacity figures/ development timeframe and their implications of viability considered.

Matter 9 – Places (including Site Allocations)

Main Issue: Are the policies and site allocations outlined within the places section of the Plan justified, effective and consistent with national policy?

[Section 5 of the Plan]

General Questions

9.1 In relation to all of the proposed site allocations contained within 'Section 5 – Places' of the Plan: Examination of the Brent Local Plan

South Place

Site allocation: BSSA1 - Asiatic Carpets

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The Asiatic Carpets side of the site to the west (430 High Road, NW10 2DA, 202086233) is allocated in the 2017 SHLAA.
- A series of exercises has been undertaken to establish the possibilities with this site, including most recently a comprehensive analysis and scoping / Level 1 masterplanning exercise, for the Church End Growth Area industrial sites. However the area requires improvement in respect of design. The site allocation describes, within the remit of the site allocation description, what would be expected. This will be supported by the wider SPD for the Church End Growth Area. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The provision of social infrastructure in a town centre location in order to address the exiting offer. In line with emerging London Plan Policy S1/ SD6/SD7 and Brent's Core Strategy for Church End Growth Area.
 - Re-provision of industrial floorspace to assist in meeting Brent's industrial land needs targets set out by West London ELS in line with London Plan policy E4/E7.
 - Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - An air quality positive approach in line with emerging London Plan Policy SI1
 - The development to be sympathetic to the protection of significant archaeological assets in line with London Plan Policy HC1 and Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).

- Considering the location of the site within Church end Growth Area, high density developments coming forward in the surrounding, adjacent to Church end Town Centre, PTAL 3, and close to residential properties, the criteria are considered deliverable.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- Part of the site has come forward from the 2013 SHLAA sites. The boundary was widened in the 2017 SHLAA to include the LSIS area. The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance: 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes.
- The site is recognised in the 2017 SHLAA as an 'allocation' with a potential to develop at 'Urban' density. The Plan indicated a higher indicative capacity of 380 which was updated to capacity of 414 (MM126). With time, the market has responded to this site differently making it suitable for higher delivery density. Compliance to changing national/regional plan policies with viability of industrial re-provision and affordable housing has also affected the capacity.
- The figure is identified as indicative and is included in the housing trajectory. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

- Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets.
- The London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year. This site was identified in the London Plan 2013/2017 SHLAA and associated call for sites. The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria.
- The site is therefore seen to be justified by the evidence base. This development will contribute in the region of 160 units to this target, plus flexible use commercial space in the new E class, and a new community centre and play space. This particular development will contribute 414 units over the plan period. The masterplanning exercise also calculated that at a 'low' level of intervention, the combined Asiatic and Cygnus sites (the allocation does include both) could realistically increase total industrial floorspace and 'flexible B1' floorspace combined, to 27000m². Current m²=19500.
- Further to this, Brent Core Strategy (Church End Growth Area) has also informed the site allocation.

Is the extent of each site correctly identified?
The site is correctly identified and informed by land ownership on the site allocation page.
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.
Is the allocated site deliverable?
<p>Kelaty Properties LLP responded to the Regulation 18 stage consultation that the site could be deliverable within the 0-5-year timeframe. To date (Note: correct in October 2019 when the Regulation 19 stage Local Plan went to cabinet for approval) no pre-application advice has been sought for the site. Given the complexities in taking forward mixed-use industrial and residential development and the uncertainties around the relocation or otherwise of the Asiatic Carpets business and probation service, the Local Plan has taken a cautious approach and assumed delivery in the period 10+ years. The Local Plan wording recognises the Asiatic Carpets site could come forward as a first phase, subject to it being demonstrated it would not prejudice the delivery of a comprehensive masterplan for the site allocation or the operation of Cygnus Business Park.</p> <p>This site is considered deliverable as it is within Growth Area with development coming forward in surrounding area. It also has a good PTAL 3/4. The site is considered to be built out within the Plan period.</p>
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
<p>The site is not within the Tall Buildings zone. The Tall Building Strategy concluded (Part 8.58) that Church End is not considered to have the characteristics that would warrant its identification as a Tall Buildings Zone. It does not have very high PTAL, existing tall buildings (10 storey+) or large contiguous areas proposed for redevelopment that would allow new character areas/ tall buildings clusters to be created.</p> <p>The Strategy identified the prevailing height to be 4-6 storeys (approx. 12-18 m), allowing new developments to be suitable for mid-rise. It recognises that possibly a slightly taller height can be guided through masterplanning exercise.</p> <p>Consistent with this, the SSA considers its position with relation to neighbouring buildings and constraints and for heights to be determined as part of the Church End Masterplan.</p>
Have all the site constraints, development mix and viability considerations been taken into account?
The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially. Constraints

are laid out in the allocation and were taken into account in the assessment of the planning application.

Site allocation: BSSA2 - B&M Home Store & Cobbold Industrial Estate

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is allocated in the 2017 SHLAA (carried over from 2013). Considering the position of the site within Church End Growth Area, and close to residential properties, the criteria are considered reasonable and necessary. A series of exercises has been undertaken to establish the possibilities with this site, including most recently a comprehensive analysis and scoping / Level 1 masterplanning exercise, for the Church End Growth Area industrial sites. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The provision of social infrastructure in a town centre location in order to address the exiting offer. In line with emerging London Plan Policy S1/ SD6/SD7, Brent's Core Strategy for Church End Growth Area and Brent's IDP.
 - Re-provision of industrial floorspace to assist in meeting Brent's industrial land needs targets set out by West London ELS in line with London Plan policy E4/E7.
 - Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - The development to be sympathetic to the protection of significant archaeological assets in line with London Plan Policy HC1 and Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
- The site is deliverable as it is in a Growth Area. It has a relatively low PTAL of 2/3 which is expected to increase on implementation of the West London Orbital. It has development coming forward in the surrounding and is close to facilities in Church End. The delivery of the criteria will be supported by the wider masterplan SPD for the Church End Growth Area.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

<ul style="list-style-type: none"> • Part of the site has come forward from the 2013 SHLAA sites. The boundary was widened in the 2017 SHLAA to include the LSIS area. The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. • The site is recognised in the 2017 SHLAA as a 'potential development' with a potential to develop at 'Urban' density. The Plan indicates a capacity of 160dph. • The figure is identified as indicative and is included in the housing trajectory.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
<ul style="list-style-type: none"> • Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. • The London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year. This site was identified in the London Plan SHLAA. The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. • The site is therefore seen to be justified by the evidence base. This particular development will contribute in the region of 160 units to this target, plus flexible use commercial space in the new E class, and a new community and health hub. • Further to this, Brent Core Strategy (Church End Growth Area) has also informed the site allocation.
Is the extent of each site correctly identified?
The site is correctly identified through 2017 SHLAA and informed by land ownership on the site allocation page.
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.
Is the allocated site deliverable?
The Brent Industrial Land Supply Audit (2019) found that the Church End industrial areas are currently unviable for stacked industrial development, mixed use industrial and residential. However, this was based on residential values at that time. It did not take into account planned regeneration including investment through the delivery of Church End Growth Area and the potential WLO, which have potential to lift values in the medium to long-term. Consideration has been given in the masterplan to deliverability and a phased

approach. In addition the recent increases in requirement for R&D space as a result of the pandemic will have a positive effect on land prices.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within the Tall Buildings zone. The Tall Building Strategy concluded (Part 8.58) that Church End is not considered to have the characteristics that would warrant its identification as a Tall Buildings Zone. It does not have very high PTAL, existing tall buildings (10 storey+) or large contiguous areas proposed for redevelopment that would allow new character areas/ tall buildings clusters to be created.

The Strategy identified the prevailing height to be 4-6 storeys (approx. 12-18 m), allowing new developments to be suitable for mid-rise. It recognises that possibly a slightly taller height can be guided through masterplanning exercise.

Consistent with this, the SSA considers its position with relation to the existing residential development to the east and for heights to be determined as part of the Church End Masterplan.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially. Constraints are laid out in the allocation and there will be more detail in the SPD which will be produced following the masterplanning exercise.

Site allocation: BSSA3 - Church End Local Centre

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The retail and leisure needs study found that Church end has the highest town centre vacancy rate in Brent. The north eastern side of the high street has some extremely dilapidated units. Car park to the rear is visually divorced from the active frontage, with unattractive backlands of the terrace casting a down-at-heel appearance over it. The area around the town centre has severe socio-economic challenges, with concentrations of multiple deprivation that are within the 10% most deprived areas nationally.
- The design principles and planning considerations are relevant as they reflect the incremental proposals set out in the Church End and Willesden Green Study to improve the town centre and market, in terms of place-making, community cohesion, permeability, security, place-making and sustainability.
- The criteria are necessary as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The provision of commercial and social infrastructure in a town centre location in order to address the exiting offer. In line with

<p>emerging London Plan Policy S1/ SD6/SD7 and Brent’s Core Strategy for Church End Growth Area.</p> <ul style="list-style-type: none"> ○ Suitable workspace including lower cost and affordable workspace in line with emerging London Plan Policy E1/E2/E3/E8 and SD6. ○ Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02). ○ Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5. ○ An air quality positive approach in line with emerging London Plan Policy SI1 ○ Transport infrastructure consideration to assist in Brent’s Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent’s Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04). ○ The development to be sympathetic to its Archaeological Priority Area, the protection of significant archaeological assets and adjacent Grade II listed building and locally listed building. In line with London Plan Policy HC1 and Brent’s Historic Environment Place-Making Strategy 2019 (EB_HC_01). <ul style="list-style-type: none"> ● The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> ○ The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. ○ The site is recognised in the 2017 SHLAA as an 'allocation' with a potential to develop at 'Urban' density. The Plan recognises an indicative capacity of 195. ○ The figure is identified as indicative and is included in the housing trajectory.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<ul style="list-style-type: none"> ● Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified need for 66,000 additional homes per year. Part of this site is identified in the London Plan SHLAA and associated call for sites. The site was then put through the process of the IIA site

<p>sustainability appraisal process. This assessed the site against a range of criteria.</p> <ul style="list-style-type: none"> • The site is therefore seen to be justified by the evidence base. This particular development will contribute in the region of 195 units to this target, plus a new flexible E class community, health and enterprise hub. • Further to this, Brent Core Strategy (Church End Growth Area) has also informed the site allocation.
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified and informed by SHLAA and land ownership on the site allocation page.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.</p>
<p>Is the allocated site deliverable?</p>
<p>This site is considered deliverable as it is within Growth Area with development coming forward in surrounding area. It also has a relatively low PTAL 2/3 which is expected to improve with implementation of the West Orbital. The site is deliverable as half of the site benefits from full planning permission and works have started on site:</p> <ul style="list-style-type: none"> • New market square: full planning permission (ref:13/1098) on site, delivering 34 units, and contributing to the 5 year land supply • Catalyst land 235 & Land in Church Road Car Park rear of 205-235 Church Road: Ref: full planning permission (ref:13/2213) on site, delivering 65 units, and contributing to the 5 year land supply • Remainder of the site is anticipated to deliver
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>The site is not within the Tall Buildings zone. The Tall Building Strategy concluded (Part 8.58) that Church End is not considered to have the characteristics that would warrant its identification as a Tall Buildings Zone. It does not have very high PTAL, existing tall buildings (10 storey+) or large contiguous areas proposed for redevelopment that would allow new character areas/ tall buildings clusters to be created.</p> <p>The Strategy identified the prevailing height to be 4-6 storeys (approx. 12-18 m), allowing new developments to be suitable for mid-rise. It recognises that possibly a slightly taller height can be guided through masterplanning exercise. This is further supported by the site's town centre location allowing a lower scale of taller buildings. As such, part 4.26 and part 8.2 of Tall Building Strategy identifies sites within town centres with acceptable building heights of 15m (5 storeys) with opportunities to go higher at strategic points in town centres.</p> <p>Consistent with this, the SSA considers acceptable height to be 3-6 storeys, allowing 6 storeys at corner sites with creating potential views to the church.</p>

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially. Constraints are laid out in the allocation.

Site allocation: BSSA4 - Chapmans and Sapcote Industrial Estate

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site has been taken forward from the 2013 SHLAA. Considering the position of the site within Church end Growth Area, with PTAL 3, and close to residential properties, the criteria are considered reasonable and necessary. A series of exercises has been undertaken to establish the possibilities with this site, including most recently a comprehensive analysis and scoping / Level 1 masterplanning exercise, for the Church End Growth Area industrial sites.
- The site is in an area of PTAL 3, and close to facilities in Dudden Hill Lane. The site allocation describes within the fairly brief remit of the Local Plan, what would be expected. This will be supported by the wider SPD for the Church End Growth Area.
- The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The provision of social infrastructure in a town centre location in order to address the exiting offer. In line with emerging London Plan Policy S1 and Brent's Core Strategy for Church End Growth Area.
 - Re-provision of industrial floorspace to assist in meeting Brent's industrial land needs targets set out by West London ELS in line with London Plan policy E4/E7.
 - Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - High standard amenity space in line with London Plan Policy D3/D6/D8/H16/E7.
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).

<ul style="list-style-type: none"> ○ Active frontage is required consistent with London Plan Policy D3/GG1.
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> • The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. • The 2017 SHLAA recognises these sites as a 'potential development' site with a potential to develop at 'Urban' density. However, the Plan identified a capacity of 200, which is now modified to higher capacity as 300 factoring in the consultation response and London Plan Policy E7 to re-provide industrial floorspace, the need to provide community facilities and acceptable heights. • The figure is identified as indicative and is included in the housing trajectory. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<ul style="list-style-type: none"> • Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified need for 66,000 additional homes per year. This site is identified in the London Plan SHLAA and associated call for sites. • The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. This particular development will contribute in the region of 160 units to this target, plus replacement of flexible E class space • Further to this, Brent Core Strategy (Church End Growth Area) has also informed the site allocation.
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified and informed by land ownership on the site allocation page.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.</p>
<p>Is the allocated site deliverable?</p>

The site benefits from a full planning application to be determined (ref:18/3498) for 245 units and Class E space. The design was revised partly due to Daylight and Sunlight considerations to surrounding occupiers, also concerns with the practicality of some of the industrial space. The remainder of the site is expected to come forward separately with an anticipated delivery of around 70 dph.

This site is also considered deliverable as it is within Growth Area with development coming forward in surrounding area. It also has a good PTAL 4/5.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

- The site is not within the Tall Buildings zone. The Tall Building Strategy concluded (Part 8.58) that Church End is not considered to have the characteristics that would warrant its identification as a Tall Buildings Zone. It does not have very high PTAL, existing tall buildings (10 storey+) or large contiguous areas proposed for redevelopment that would allow new character areas/ tall buildings clusters to be created.
- The Strategy identified the prevailing height to be 4-6 storeys (approx. 12-18 m), allowing new developments to be suitable for mid-rise. It recognises that possibly a slightly taller height can be guided through masterplanning exercise.
- Consistent with this, the SSA considers the relation to neighbouring buildings and constraints and for heights to be determined as part of the Church End Masterplan.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially. Constraints are laid out in the allocation.

Site allocation: BSSA5 - Willesden Bus Depot

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site has been taken forward from the 2013 SHLAA. Considering the position of the site within Church end Growth Area, and close to residential properties, the criteria are considered reasonable and necessary. A series of exercises has been undertaken to establish the possibilities with this site, including most recently a comprehensive analysis and scoping / Level 1 masterplanning exercise, for the Church End Growth Area potential allocations.
- The site is in an area of PTAL 5, and close to facilities in Dudden Hill Lane. The site allocation describes within the fairly brief remit of the Local Plan, what would be expected. This will be supported by the wider SPD for the Church End Growth Area.
- The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,

- Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
- The provision of employment use/social infrastructure in an out of town centre location in order to address the exiting offer. In line with emerging London Plan Policy S1 and Brent’s Core Strategy for Church End Growth Area.
- An air quality positive approach in line with emerging London Plan Policy SI1
- The development to be sympathetic to the protection of significant heritage assets, non-designated heritage assets, Locally Listed buildings. In line with London Plan Policy HC1 and Brent’s Historic Environment Place-Making Strategy 2019 (EB_HC_01).
- Transport infrastructure consideration to assist in Brent’s Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent’s Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- Contamination remediation in line with London Plan policy E7.
- Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
- Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance: 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes.

The site is recognised in the 2017 SHLAA as a 'potential development' with a potential to develop at 'Urban' density. It is anticipated to deliver 60 units. A much lower capacity than the SHLAA due to the requirement to re-provide other uses such as re-provision of bus depot.

The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

- Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year. This

<p>site is identified in the London 2013/2017 SHLAA and associated call for sites.</p> <ul style="list-style-type: none"> • The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. This particular development will contribute in the region of 60 units to this target, plus replacement of the bus garage. • Further to this, Brent Core Strategy (Church End Growth Area) has also informed the site allocation.
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified and informed by land ownership on the site allocation page.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable</p>
<p>Is the allocated site deliverable?</p>
<p>The site is considered deliverable as it is within Growth Area with development coming forward in surrounding area. It also has a high PTAL 5/6. The policy shows flexibility on the basis of the bus depot to be retained or relocated.</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<ul style="list-style-type: none"> • The site is not within the Tall Buildings zone. The Tall Building Strategy concluded (Part 8.58) that Church End is not considered to have the characteristics that would warrant its identification as a Tall Buildings Zone. It does not have very high PTAL, existing tall buildings (10 storey+) or large contiguous areas proposed for redevelopment that would allow new character areas/ tall buildings clusters to be created. • The Strategy identified the prevailing height to be 4-6 storeys (approx. 12-18 m), allowing new developments to be suitable for mid-rise. It recognises that possibly a slightly taller height can be guided through masterplanning exercise. • Consistent with this, the SSA considers the predominant character of the area which is 2-4 storeys in height. There is a scope of more height towards the high road and Pound Lane. The development has to take into account the presence of heritage assets.
<p>Have all the site constraints, development mix and viability considerations been taken into account?</p>
<p>The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially. Constraints are laid out in the allocation.</p>

Site allocation: BSSA6 - Argenta House and Wembley Point

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site has been taken forward from the 2013/2017 SHLAA sites. Considering the site's PTAL 4 and surround development, the criteria are considered deliverable.
- The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
 - The provision of retail/social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy S1.
 - Suitable workspace including lower cost and affordable workspace in line with emerging London Plan Policy E1/E2/E3/E8 and SD6.
 - An air quality neutral approach in line with emerging London Plan Policy SI1
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - Retain the wildlife corridor and Grade I SINC through adopting urban greening measures and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Brent's Open Space, Sports and Recreation Study (EB_GI_02)
 - A well-designed, safe, accessible, inclusive, attractive, well-connected/maintained public realm improvement in line with London Plan Policy D3/D8/D9.
 - Contamination remediation in line with London Plan policy E7.
 - Re-provision of affordable workspace to assist in meeting Brent's employment/industrial land needs targets set out by West London ELS in line with London Plan policy E4/E7.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes.
- The plan indicates a slightly higher number with a proposed modification (MM141) of 569. This takes into account the Local Plan consultation rep and the recent most planning applications related to the site.
 - Wembley Point: Prior approval (ref:18/3125), 439 units
 - Argenta House site: Approved full planning application(ref:18/4847), 130 units
- The figure is identified as indicative and is included in the housing trajectory. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

- Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. This site was identified in the London Plan 2013/2017 SHLAA and associated call for sites.
- The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. This particular development will contribute in the region of 569 units to this target, plus the possibility of affordable workspace.

Is the extent of each site correctly identified?

The site is correctly identified and informed by SHLAA and land ownership on the site allocation page.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

See applications 18/4847, and 18/3125, on trajectory. The indicative capacity for the Wembley Point site recognises that most of the site is within Flood zone 3b. At the time the Regulation 19 Local Plan was being finalised the applicant promoting the Wembley Point site had commissioned modelling work to review the flood zones, but this had not been completed and/or approved by the Environment Agency.

The site allocation recognises in the justification for the policy 'The indicative capacity takes into account that the majority of the site is within functional floodplain and therefore not suitable for development. Should flood risk modelling approved by the Environment Agency result in changes to the extent of the functional floodplain, a higher level of development may be achievable. In such a scenario the design principles and policy considerations outlined would still apply.' (page 147) Delivery is expected 2023.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site falls within Tall Building Zone Core. Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). Appropriate general heights are stated in detail under each 'Areas of search' for tall buildings. In this case, Stonebridge is recognised in

the tall building cluster (part.7.4) with an appropriate height of 4-26 storeys (12-78m).

Wembley Point has been recognised as the pinnacle by the Tall Building Strategy (part 8.35) with buildings of 10 storeys or more will be within the core. Keeping this in mind, the SSA policy adapts tall building heights considering that the development integrates well with the surrounding context, being of a high quality design and respecting local character.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially. Constraints are laid out in the allocation.

Other site allocations

Site allocation: BSSA7 - Bridge Park & Unisys

Are the criteria in the allocations policy necessary, relevant and deliverable?

- This is a prominent site situated at a gateway into Brent, brought forward from the 2013 SHLAA/2017 SHLAA. The site benefits from good public transport access with a PTAL rating of 4. In its current state the site is of a poor environmental quality, with dated buildings.
- Redevelopment would improve the environmental quality of the area, help reduce flood risk and create an attractive gateway to the borough and Stonebridge.
- The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
 - The provision of commercial/social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy E9/S1.
 - Leisure centre to meet the need as set out in the Brent Indoor Sports and Leisure Needs Assessment (EB_S_04) and Brent's Open Space, Sports and Recreation Study (EB_GI_02).
 - Hotel to meet visitor accommodation need in line with London Plan Policy E10.
 - An air quality neutral approach in line with emerging London Plan Policy SI1
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - A well-designed, safe, accessible, inclusive, attractive, well-connected/maintained public realm improvement in line with London Plan Policy D3/D8/D9.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's

Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The site is recognised in the 2017 SHLAA as an 'allocation' with a potential to develop at 'Urban' density. The Plan indicates a capacity of 505 being expected to be delivered over the plan period. The figure is identified as indicative and is included in the housing trajectory.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
<ul style="list-style-type: none"> ○ Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified need for 66,000 additional homes per year. ○ This site was identified in the London Plan SHLAA and associated call for sites. ○ The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. This particular development will contribute in the region of 525 units to this target, plus employment floorspace, sustainability and environmental improvements, surface water flood mitigation, and community / cultural enhancement. ○ This is based on a SHLAA assessment of 'urban' and density of 145 dwellings per hectare.
Is the extent of each site correctly identified?
The site is correctly identified and informed by land ownership on the site allocation page.
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.
Is the allocated site deliverable?
The site benefits from pre-apps. In addition, it is at a location where adjacent development is happening and has a high PTAL: 4.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site falls within Tall Building Zone Core. Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character.

Appropriate general heights are stated in detail under each 'Areas of search' for tall buildings. In this case, Stonebridge is recognised in the tall building cluster (part.7.4) with an appropriate height of 4-26 storeys (12-78m). In addition the strategy recommends reducing building heights near to the zone's boundary. As such, the SSA considers the prevailing lower-context height and scale of the south eastern border where it adjoins 2 storey residential housing on First Drive. SSA policy adapts tall building heights considering the development will need to successfully mediate between the taller elements

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially. Constraints are laid out in the allocation.

Site allocation: BSSA8 - McGovern's Yard (NW10 2EE)

Are the criteria in the allocations policy necessary, relevant and deliverable?

PTAL 5, near a local centre and with under-utilised space, the site is suitable for densification. Replacement flexible class E space is required in line with draft local plan policy BE3.

The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,

- Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
- An air quality neutral approach in line with emerging London Plan Policy SI1
- Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
- Contamination remediation in line with London Plan policy E7.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA,

<p>density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.</p> <ul style="list-style-type: none"> ○ The site is identified as 'urban' with a suitable density of 145 dwellings per hectare.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. This site was identified in the London Plan SHLAA (ref: 17050237). The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. This particular development may contribute around 50 units to this target, plus employment floorspace.</p>
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified on the interactive map and on the allocation map, and informed by land ownership.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.</p>
<p>Is the allocated site deliverable?</p>
<p>Interest at pre-application stage has been received and advice given however was for a large part of the allocation, not all of it. Potential completion 2023. Amendments were requested.</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>The site is not in in a Tall Buildings Zone. Much of the area has a low-rise character. In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character.</p>
<p>Have all the site constraints, development mix and viability considerations been taken into account?</p>
<p>The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially. Constraints are laid out in the allocation.</p>

Site allocation: BSSA9 - Barry's Garage (NW10 2JD)

Are the criteria in the allocations policy necessary, relevant and deliverable?

PTL 5 site close to other larger sites and within town centre buffer zone. Site currently under-utilised. Criteria take into account current use and nearby heritage assets.

The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,

- Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
- The provision of community space, in line with emerging London Plan Policy S1.
- Suitable workspace including lower cost and affordable workspace in line with emerging London Plan Policy E1/E2/E3/E8 and SD6.
- An air quality neutral approach in line with emerging London Plan Policy SI1
- Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
- Retain the nearby church and club as stated
- A well-designed, safe, accessible, inclusive, attractive, well-connected/maintained public realm improvement in line with London Plan Policy D3/D8/D9.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory. The site is classified as 'urban' in the SHLAA with an expected density of 200 dwellings per hectare.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. This site was identified in the London Plan SHLAA (ref: 17050260). The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. This particular development may contribute around 40 units to this target, plus employment floorspace.

Is the extent of each site correctly identified?

The site is correctly identified on the interactive map and on the allocation map, and informed by land ownership.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

The value of the land and site allocation will hopefully instigate interest and delivery.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not in a Tall Buildings Zone. In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. The area is characterised by lower rise development and is not near to an area of tall development in order to step up.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially.

Site allocation: BSSA10 - Dudden Hill Community Centre (NW10 2ET)

Are the criteria in the allocations policy necessary, relevant and deliverable?

The site is on the opposite side of the road to the Church End Growth area and two larger SHLAA site allocations. PTAL is 5. The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as:

- Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
- Compensatory games court and playground provision in line with Draft London Plan S4: Play and informal recreation and S5: Sport and recreation facilities, and Brent's Open Space, Sports and Recreation Study (EB_GI_02).
- An air quality neutral approach in line with emerging London Plan Policy SI1
- Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
- A well-designed, safe, accessible, inclusive, attractive, well-connected/maintained public realm improvement in line with London Plan Policy D3/D8/D9.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) have identified the need for 66,000 additional homes per year.

The site was put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. This particular development will contribute in the region of 25 units to this target, plus renewed playground and games court provision.

Is the extent of each site correctly identified?

The site is correctly identified on the interactive map and informed by ownership.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

The site is in Council ownership, and a planning application has been granted, re. 19/1095. Delivery is expected 2022/23. 25 of the 26 units will be homes for social rent.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within tall buildings area. Height approved is 4-5 storeys and is conversant with other similar development nearby, e.g. at 38-44 Dudden Hill Lane- stepping up to the Tall Building zone which is around 280m to the north-west.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local

Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is based on assessed local housing needs and was configured during the procurement and pre-application process by the project team within the Council. Constraints are documented within the site allocation and evidence base SPD_015.

Site allocation: BSSA11 - Euro Car Rental (Vanguard Rental, 101 Brentfield Road, NW10 8LD)

Are the criteria in the allocations policy necessary, relevant and deliverable?

The comments mention a nearby locally significant building, the height character of the surrounding residential buildings, and the wildlife improvement potential of the canal.

The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as:

- Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
- An air quality neutral approach in line with emerging London Plan Policy SI1
- Respect in the design to the character of the nearby Neasden Temple
- A well-designed, safe, accessible, inclusive, attractive, well-connected/maintained public realm improvement in line with London Plan Policy D3/D8/D9.
- Enhancement of biodiversity in line with Draft London Plan G6: Biodiversity and access to nature and SI17: Protecting and enhancing London's waterways

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance: 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The site is identified as 'urban' in the SHLAA and capable of providing 80 dwellings per hectare. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) have identified need for 66,000 additional homes per year. This site was identified in the London Plan SHLAA (ref: 17050099). The site was then put through the process of the IIA site

sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. This development would contribute 25 new units.
The figure is identified as indicative and is included in the housing trajectory.

Is the extent of each site correctly identified?

The site is correctly identified on the interactive map and informed by ownership.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable. Requirements are given in broad terms (number of units 25, height of buildings and incorporation of nature features)

Is the allocated site deliverable?

Neasden Temple own land around the BAPS Swaminarayan Mandir Temple, and have expressed an interest in bringing this forward. The Local Plan recognises the opportunity to improve connections to the temple and for surrounding buildings to better complement its setting. The Council would be supportive of proposals to provide community benefit and improve its setting and connectivity. The Temple is at an early stage in exploring options, and as such it is considered premature to include a detailed site allocation in the Local Plan at the present time. In addition, when feasibility work on the West London Orbital provides greater clarity on the location of stations this will have implications for any future proposals. It is therefore considered if proposals are advanced they could inform the next iteration of the Local Plan.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within tall buildings area. While Brent has a large housing target, the NPPF and London Plan are clear that this growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. The area is predominantly low-rise; in addition taller buildings would be insensitive to the importance of the design of the temple and local views of it.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is laid out in policy BH6, but the degree of specificity is low (we only specify 25% 3-bed units) as this is a matter for the developers to decide initially.

The Temple is at an early stage in exploring options, and as such it is considered premature to include a detailed site allocation in the Local Plan at the present time. In addition, when feasibility work on the West London Orbital provides greater clarity on the location of stations this will have implications

for any future proposals. It is therefore considered if proposals are advanced they could inform the next iteration of the Local Plan.

Site allocation: BSSA12 - 296-300 High road, Willesden, NW10 2EN

Are the criteria in the allocations policy necessary, relevant and deliverable?

PTAL 5 site near a local centre and within town centre buffer area, and the Church end Growth Area. Allocated as a mixed-use space to incorporate commercial, community use and public space to incorporate public art. Considering the prominent corner position, the allocation is considered reasonable, and the desirables are considered deliverable.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) have identified need for 66,000 additional homes per year. This particular development would contribute 8 new units, commercial space and improved public realm. The site is bordered on 3 aspects by SHLAA 2017 allocations.

Is the extent of each site correctly identified?

The site is correctly identified on the interactive map.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

An application for 8 units was granted in 2015 and is expected to be completed 2020/21 year. The allocation is considered deliverable in light of this.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within a tall buildings area, so this is not relevant.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is in policy BH6.

Site allocation: BSSA13 - Learie Constantine Centre

Are the criteria in the allocations policy necessary, relevant and deliverable?

One-storey building in PTAL 5, council-owned, in poor condition. The development will replace the existing community centre with a more modern and soundproofed facility, with more space, plus 26 units, 25 of which are to be for social rent. The extant permission would indicate the Council will to develop the site; the inclusion community centre would indicate the deliverability of this requirement. Amount of housing exceeded that of the allocation, as site was expanded beyond the allocation.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) have identified need for 66,000 additional homes per year. This particular development would contribute 8 new units, commercial space and improved public realm.

Is the extent of each site correctly identified?

The site is correctly identified on the interactive map. 19/1095 also takes in the car park to the rear and two properties alongside.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

An application for 8 units was granted in 2015 and is expected to be completed 202/23 year. The allocation is considered deliverable in light of this. Council-owned site.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within tall buildings area. While Brent has a large housing target, the NPPF and London Plan are clear that this growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. The area is predominantly low-rise; tall buildings (10 floors plus) would be out of character here.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is in policy BH6, but when developing for social housing, may also influenced by specific local housing needs.

Site allocation: BSSA14 - Morland Gardens

Are the criteria in the allocations policy necessary, relevant and deliverable?

The criteria only mentions the housing allocation. Council-owned building, currently in use as a college. Development would re-provide the FE college, affordable workspace, plus residential units. The site is located within an area with a good PTAL rating of 4, within 10 minutes' walk of Harlesden Overground station to the south. It is a sustainable location, where intensification of sites for residential use should be supported.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site, less detail is included. Although a major site it is a 'smallscale major'; the referral to committee is due to the number of objections on the case.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) have identified need for 66,000 additional homes per year. This site was identified in the London Plan SHLAA, characterised as 'urban' with an expected density of 213 units per hectare. The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is

therefore seen to be justified by the evidence base. This development will contribute 65 new units, affordable workspace and expanded educational facilities.

Is the extent of each site correctly identified?

The site is correctly identified on the interactive map and informed by ownership.

Are the detailed requirements for each site clear and justified?

The requirements are given in broad terms as it is a smaller site.

Is the allocated site deliverable?

Full planning application was approved by Planning Committee on 12/8/20. The allocation is considered deliverable in light of this. Council-owned site.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within a tall buildings area. The site is not within tall buildings area. While Brent has a large housing target, the NPPF and London Plan are clear that this growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. The area is predominantly low to mid-rise.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is in policy BH6 and informed in the case of social housing by specific local needs.

Site allocation: BSSA15 - Harlesden Station Junction

Are the criteria in the allocations policy necessary, relevant and deliverable?

Harlesden Station Junction is identified as a 'gateway to Harlesden' in the neighbourhood plan which was adopted in May 2019- as a place where the public realm should be improved.

The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as:

- Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
- An air quality neutral approach in line with emerging London Plan Policy SI1
- A well-designed, safe, accessible, inclusive, attractive, well-connected/maintained public realm improvement in line with London Plan Policy D3/D8/D9.
- Improved connectivity to Harlesden Town Centre.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. The

figure includes the desirability of public real improvements. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) have identified need for 66,000 additional homes per year. This particular development would contribute around 3 new units, commercial space and improved public realm.

Is the extent of each site correctly identified?

The site is located correctly, on the interactive map. However the red line needs tidying up using trace function as currently it encompasses part of the land in no. 7 Winchelsea Rd.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

The site is adjacent to larger SHLAA identified sites, in an area of PTAL 5. It is currently bounded by advertising hoardings and providing little return considering the value of the land, which is also in town centre buffer land. It is considered that approach from a developer is likely.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not in the Tall Building Zone. While Brent has a large housing target, the NPPF and London Plan are clear that this growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is in policy BH6. Presence of the adjacent railway lines is a constraint and one main reason for the low allocation, other than the need for public realm improvements.

Site allocation: BSSA16 - Mordaunt Road

Are the criteria in the allocations policy necessary, relevant and deliverable?

Small local parade, adjacent to and south of an allocation identified on the 2013 but not carried forward to 2017 SHLAA. This allocation was not taken forward. The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as:

- Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
- Mixed use residential with potential for custom or self-build
- An air quality neutral approach in line with emerging London Plan Policy SI1
- A well-designed, safe, accessible, inclusive, attractive, well-connected/maintained public realm improvement in line with London Plan Policy D3/D8/D9.
- Enhance the setting of Harlesden Station and improve connectivity to Harlesden Town Centre.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. The figure includes the desirability of public real improvements. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) have identified need for 66,000 additional homes per year. This particular development would contribute around 8 new units, and public realm improvements.

Is the extent of each site correctly identified?

The site is correctly located on the interactive map. However it requires refinement, as the allocation red line currently includes the first house of the purely residential terrace.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?
The site is adjacent to larger SHLAA identified sites, in an area of PTAL 5. The premises are in poor condition with many extensions and subdivisions. The site could deliver better quality buildings with higher density and improved commercial units.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The site is not in the Tall Building Zone, so this is not relevant. While Brent has a large housing target, the NPPF and London Plan are clear that this growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character
Have all the site constraints, development mix and viability considerations been taken into account?
The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is in policy BH6.

Site allocation: BSSA17 – Harlesden Railway Generation Station
Are the criteria in the allocations policy necessary, relevant and deliverable?
The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Harlesden is identified in the Brent Workspace Study as a priority town centre and economic hub (p.9, EB_E_09), with demand expected to increase as a result of the Old Oak common development. Enhance the setting of Harlesden Station and improve connectivity to Harlesden Town Centre
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
Not relevant as this allocation is not for housing.
Is the description of the site necessary to be included within the policy wording?
The description is to identify the site and together with the address is considered sufficient.
Is the allocation justified by the evidence base?
The Council is committed to providing the affordable workspace which has found to be deficient in provision in the Borough (evidence base ref. EB_E_011). This affordable workspace will help to enable and attract the Incubator, Accelerator and Creative businesses that will add vitality, employment and diversification of skills, to the Borough.
Is the extent of each site correctly identified?
The site is correctly identified on the GIS layer and will be on the interactive map. It is informed by the LGPR and ownership records.
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the

table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

The site is already in operation as art studios and it is considered that the location and type of building is suitable for a workspace development.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not in a tall buildings zone.

Have all the site constraints, development mix and viability considerations been taken into account?

As this is a workspace, this is covered above. Viability has been ascertained via research into workspace requirements in the borough, see evidence base EB_E_09.

Site allocation: BSSA18 - Harlesden Telephone Exchange NW10 4UJ

Are the criteria in the allocations policy necessary, relevant and deliverable?

Low rise, 2 storey building, adjacent to Grade 2 listed church. Requirements reflect this constraint and surrounding residential development which is 2 to 3 storeys.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. The figure includes the desirability of public real improvements. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) have identified need for 66,000 additional homes per year. This site was identified in the London Plan SHLAA (ref: 17050346). The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. This particular development would contribute around 52 new units, commercial space, and improvements to the visual quality of the locality and the relationship with the listed building.

Is the extent of each site correctly identified?

The site is correctly identified on the interactive map. The postcode in the draft plan is incorrect- it needs amending to NW10 4UJ.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

BT has an ongoing programme to consolidate into 30 major locations and cut costs. It is likely that a site such as this would be profitable for development and suitable for sale. <https://www.theguardian.com/business/2019/jun/05/bt-to-close-offices-in-more-than-270-uk-locations>

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not in the Tall Building Zone, so this is not relevant. While Brent has a large housing target, the NPPF and London Plan are clear that this growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. Unit mix is in policy BH6.

Site allocation: BSSA19 – Chancel House

Are the criteria in the allocations policy necessary, relevant and deliverable?

The criteria are necessary and relevant as it reflects the requirement for a school, the specificity to be laid down later once the exact needs of the DoFE are known.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

Not relevant as this is not a housing allocation.

Is the description of the site necessary to be included within the policy wording?

The description and address clearly identifies the site.

Is the allocation justified by the evidence base?

There is a demonstrable need for a new secondary school in the borough as evidenced in the emerging Infrastructure Delivery Plan (evidence base EB_I_01). Whilst current site allocation CE5 allocates Chancel House for mixed-use development including housing and employment, this is from the 2011 Site Allocation DPD. Hence the SHLAA allocation. As explained in the Infrastructure Delivery Plan, (EB_I_01), an additional 10 forms of entry are

required by 2023/24 to meet forecast demand and provide a 5% operating margin.

Is the extent of each site correctly identified?

Yes, the site is accurately identified and will be on the interactive map.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

6 forms of entry will be provided by the North Brent School at Chancel House (2022) Neasden which will be a new 6 FE facility delivered by the Department for Education (DfE). In addition, a secondary school(s) expansion programme is in development to provide up to 4 FE if required.

The site is currently under application, and expected to be granted. Applicant is the Secretary of State for Education.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not in the Tall Building Zone, so this is not relevant. The height of the proposed building reflects the surrounding mid-rise character.

Have all the site constraints, development mix and viability considerations been taken into account?

These are taken into consideration in the pre-application advice and officer report.

Matter 9 – Places (including Site Allocations)

Main Issue: Are the policies and site allocations outlined within the places section of the Plan justified, effective and consistent with national policy?

[Section 5 of the Plan]

General Questions

9.1 In relation to all of the proposed site allocations contained within 'Section 5 – Places' of the Plan: Examination of the Brent Local Plan

South East Place
Site allocation: BSESA1 - Austen
Are the criteria in the allocations policy necessary, relevant and deliverable?
<ul style="list-style-type: none"> • The majority of the site is in public ownership and part of the South Kilburn Growth Area (GA), identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017 (ref: SPD_012-015). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as, <ul style="list-style-type: none"> ○ Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10 ○ The provision of commercial and social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy E9/S1 and Brent's Core Strategy for South Kilburn Growth Area. ○ Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04). ○ An air quality positive approach in line with emerging London Plan Policy SI1 ○ Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6. • The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations. • The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Tall Building Zone, Brent's IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
<ul style="list-style-type: none"> • The indicative capacity of 99 dwellings in the Plan has been attained through a masterplanning exercise that took account of the site's characteristics and the need to re-provide new homes and social infrastructure within the South Kilburn estate. Dwelling mix will be based on assessed local housing needs and will be configured during the

<p>procurement and pre-application process by the project team within the Council.</p> <ul style="list-style-type: none"> • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocations will be subject to modifications to ensure that they are consistent with the number and delivery timing identified within the updated trajectory.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2017 SHLAA and associated call for sites. • Brent Core Strategy (South Kilburn Growth Area) • Tall Building Zone (Tall Building Strategy) • South Kilburn SPD 2017 (SPD_012- SPD_15) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified and informed by land ownership on the site allocation page.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>The allocation policy includes clear justification. Please also see the South Kilburn SPD (SPD_012-015).</p>
<p>Is the allocated site deliverable?</p>
<p>The site is in public ownership apart from the Church and Community Centre that would be incorporated into the new development, either through redevelopment or with adjoining sympathetically designed development. This site is considered deliverable as it is within Growth Area with high density development coming forward in surrounding area. It also has a good PTAL 5. The site is considered to be built out within the Plan period and therefore does not contribute to the initial 5 year housing land supply.</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<ul style="list-style-type: none"> • The site falls within Tall Building Zone. Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). However, appropriate general heights are stated in detail under each 'Areas of search' for tall buildings (6. South Kilburn). • In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn

Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context.

- Consistent with that, due to the lower heights in the adjacent north and south, the SSA policy suggests that the building height should be of a lower contextual height of 4-6 storeys and should respect the prevailing height of the surrounding area.

Have all the site constraints, development mix and viability considerations been taken into account?

As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015. It will deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSESA2 – Blake

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017.
- The criteria are necessary as the current block is of a poor construction that is not viable or desirable to refurbish, together with poor quality, disjointed open space of poor layout and unclear function. A new perimeter block is envisioned, along modern urban design principles and with better connectivity between the main streets.
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations. It also allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - An air quality positive approach in line with emerging London Plan Policy SI1
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - The development to be sympathetic to locally listed buildings to the west of the site, required by the Tall Building Strategy and supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.
- The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Tall Building Zone, Brent's IDP,

Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
<ul style="list-style-type: none"> • The indicative capacity of 121 dwellings in the Plan has been attained through a master planning exercise that took account of the site's characteristics and the need to re-provide new homes within the South Kilburn estate. Dwelling mix will be based on assessed local housing needs and will be configured during the procurement and pre-application process by the project team within the Council. • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocations will be subject to modifications to ensure that they are consistent with the number and delivery timing identified within the updated trajectory.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
<p>Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2017 SHLAA and associated call for sites. • Brent Core Strategy (South Kilburn Growth Area) • Tall Building Zone (Tall Building Strategy) • South Kilburn SPD 2017 (SPD_012- SPD_15) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
The site is correctly identified and informed by land ownership on the site allocation page.
Are the detailed requirements for each site clear and justified?
The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017 (SPD_015).
Is the allocated site deliverable?
This site is considered deliverable as it is within Growth Area with high density development coming forward in surrounding area. It also has a good PTAL 5.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
<ul style="list-style-type: none"> • The site falls within Tall Building Zone. Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). However, appropriate general heights are stated

in detail under each 'Areas of search' for tall buildings (6. South Kilburn).

- In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context.
- Consistent with that, the SSA policy suggests that the building height should be of a lower contextual height of 4-8 storeys and should respect the prevailing height of the surrounding area.

Have all the site constraints, development mix and viability considerations been taken into account?

As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015. It will deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSESA3 - Carlton House

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The Site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The provision of social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy S1 and Brent's Core Strategy for South Kilburn Growth Area.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - An air quality positive approach in line with emerging London Plan Policy SI1
 - Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Tall Building Zone, Brent's IDP,

Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
<ul style="list-style-type: none"> The indicative capacity in the Plan was originally attained through a masterplanning exercise that took account of the site's characteristics and the need to re-provide new homes and social infrastructure within the South Kilburn estate. Subsequent to this the site has been subject to a planning permission 18/4920 which will change its capacity to 84 dwellings. This has been reflected in the Housing Trajectory August 2020. The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. The site allocations will be subject to modifications to ensure that they are consistent with the number and delivery timing identified within the updated trajectory.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
<p>Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> 2017 SHLAA and associated call for sites. Brent Core Strategy (South Kilburn Growth Area) Tall Building Zone (Tall Building Strategy) South Kilburn SPD 2017 (SPD_012- SPD_15) IIA - Site Allocation Assessments Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
The site is correctly identified on the site allocation page. Note that the part referred to fronts Albert Road; 'Carlton House' is currently a development consisting of several broadly identical buildings on 4 different streets. The specific 'L' shaped allocation which does not cover all these is intentional.
Are the detailed requirements for each site clear and justified?
The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017 (SPD_015).
Is the allocated site deliverable?
<ul style="list-style-type: none"> The site is in public ownership. This site is considered deliverable as it is within Growth Area with high density development coming forward in surrounding area. It also has a good PTAL 5. In addition, the site benefits from an approved full planning permission 18/4920. Note this permission also covers Neville & Winterleys (BSESA10)
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

- The site falls within Tall Building Zone Core, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core. However, the strategy recommends reducing building heights near to the zone's boundary. Supporting this, the Strategy sets out recommendations based on individual Growth Areas. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context.
- Consistent with that, the SSA policy suggests that the building height should be of a lower contextual height of 4-6 storeys and should respect the prevailing height of the surrounding area. The massing and heights were revised following analysis of Daylight and Sunlight reports, in collaboration with the developers (Brent Housing).

Have all the site constraints, development mix and viability considerations been taken into account?

As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015. It will also deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSESA4 - Carlton Infant School

Are the criteria in the allocations policy necessary, relevant and deliverable?

Site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,

- Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy GG4/D1/H1/SD10
- An air quality positive approach in line with emerging London Plan Policy SI1
- Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.

- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The indicative capacity in the Plan has been attained through a masterplanning exercise that took account of the site's characteristics and

<p>the need to re-provide new homes and social infrastructure within the South Kilburn estate. Dwelling mix will be based on assessed local housing needs and will be configured during the procurement and pre-application process by the project team within the Council.</p> <ul style="list-style-type: none"> • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocations will be subject to modifications to ensure that they are consistent with the number and delivery timing identified within the updated trajectory.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2017 SHLAA • Brent Core Strategy (South Kilburn Growth Area) • South Kilburn SPD 2017 (SPD_012- SPD_15) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified and informed by land ownership on the site allocation page.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (parts 1 to 4 in the evidence base, refs SPD_012 to SPD_015)</p>
<p>Is the allocated site deliverable?</p>
<ul style="list-style-type: none"> • The school will be re-located on the new site at Wordsworth and Masefield, as per the masterplan. New development would follow modern urban design principles and design quality, with improvements to the environment and legibility of the area. • This site is considered deliverable as it is within Growth Area with development coming forward in surrounding area. It also has a PTAL of 5 which is set to be improved due to the regeneration and masterplan approach to this area.
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>The site is not within the Tall Building Zone although it sites within the site is within the South Kilburn GA allowing the SSA a lower scale of development from 4-6 storeys. The allocation has been compiled considering its position with relation to neighbouring buildings, including Saltram Crescent properties' rear gardens.</p>

Have all the site constraints, development mix and viability considerations been taken into account?

As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015. It will also deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSESA5 - Craik (Court)

Are the criteria in the allocations policy necessary, relevant and deliverable?

- Site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The provision of commercial in order to address the exiting offer. In line with emerging London Plan Policy E9 and Brent's Core Strategy for South Kilburn Growth Area.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - An air quality positive approach in line with emerging London Plan Policy SI1
 - Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.
 - Active frontage as required by London Plan Policy D3/GG1.
 - Adopting urban greening measures through trees planting and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Tall Building Zone, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The indicative capacity in the Plan of 120 dwellings has been attained through a masterplanning exercise that took account of the site's

<p>characteristics and the need to re-provide new homes and social infrastructure within the South Kilburn estate. Dwelling mix will be based on assessed local housing needs and will be configured during the procurement and pre-application process by the project team within the Council.</p> <ul style="list-style-type: none"> • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocations will be subject to modifications to ensure that they are consistent with the number and delivery timing identified within the updated trajectory.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2017 SHLAA • Brent Core Strategy (South Kilburn Growth Area) • Tall Building Zone (Tall Building Strategy) • South Kilburn SPD 2017 (SPD_012- SPD_15) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified and informed by land ownership on the site allocation page.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (parts 1 and 4 in the evidence base, refs SPD_012 and SPD_015)</p>
<p>Is the allocated site deliverable?</p>
<ul style="list-style-type: none"> • The current blocks are of low density, with poorly defined entrances. New development would follow modern urban design principles and design quality. The new building would be part of the gateway to South Kilburn and would be likely to include some commercial frontage giving a mix of uses and activity at various times of day. • This site is considered deliverable as it is within Growth Area with development coming forward in surrounding area. It also has a good PTAL 5. • The site is in public ownership and development is expected to commence between 2023-2026; within the early part of the plan period.
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<ul style="list-style-type: none"> • The site falls within Tall Building Zone core, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres)

inside the core. However, appropriate general heights are stated in detail under each 'Areas of search' for tall buildings (6. South Kilburn).

- In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context.
- Consistent with that, due to the lower heights in the adjacent Peel and Canterbury road frontage, the SSA policy suggests maximum 14 storeys with the building height stepping down to respect the relation to neighbouring buildings and facilitate daylight/sunlight to the buildings.

Have all the site constraints, development mix and viability considerations been taken into account?

As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015. It will also deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSESA6 - Crone & Zangwill

Are the criteria in the allocations policy necessary, relevant and deliverable?

- Site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017.
- The criteria in the allocation are relevant to the regeneration of South Kilburn as in the adopted masterplan and SPD. Deliverability is established in the project delivery model already being used. Furthermore, the criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The provision of commercial in order to address the exiting offer. In line with emerging London Plan Policy E9 and Brent's Core Strategy for South Kilburn Growth Area.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - An air quality positive approach in line with emerging London Plan Policy SI1
 - Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.

<ul style="list-style-type: none"> ○ Adopting urban greening measures through trees planting and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02). • The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Tall Building Zone, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> • The indicative capacity in the Plan was originally attained through a masterplanning exercise that took account of the site's characteristics and the need to re-provide new homes and social infrastructure within the South Kilburn estate. • This development will contribute 145 homes. • The figure is identified as indicative and is included in the housing trajectory. The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocation will be subject to modifications to ensure consistency with the number and delivery timing identified within the updated trajectory.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2017 SHLAA and associated call for sites. • Brent Core Strategy (South Kilburn Growth Area) • Tall Building Zone (Tall Building Strategy) • South Kilburn SPD 2017 (SPD_012- SPD_15) • IIA - Site Allocation Assessments <p>Tested positive through the Sustainability Appraisal</p>
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified on the interactive map and site allocation page.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (parts 1 and 4 in the evidence base, refs SPD_012 and SPD_015)</p>
<p>Is the allocated site deliverable?</p>
<p>This site is considered deliverable as it is within Growth Area with high density development coming forward in surrounding area. It also has a good PTAL 4-5. The site is in public ownership and development is expected to commence within the first ten years of the plan period.</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>

- The site is within the Tall Buildings zone core. Although the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core. However, appropriate general heights are stated in detail under each 'Areas of search' for tall buildings (6. South Kilburn).
- In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context.
- Consistent with that and the South Kilburn SPD, the SSA policy sets out that the building height of 4-10 storeys in relation to neighbouring site allocations with regard to daylight and sunlight to other residences and the nearby Woodhouse Urban Park.

Have all the site constraints, development mix and viability considerations been taken into account?

As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015. It will also deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSESA7 - Dickens (NW6 5YP)

Are the criteria in the allocations policy necessary, relevant and deliverable?

- Site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017.
- The criteria in the allocation are relevant to the regeneration of South Kilburn as in the adopted masterplan and SPD. Deliverability is established in the project delivery model already being used. Furthermore, the criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy GG4/D1/H1/SD10
 - The development to be sympathetic to locally listed buildings to the west of the site, required by the Tall Building Strategy and supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).

<ul style="list-style-type: none"> ○ An air quality positive approach in line with emerging London Plan Policy SI1 ○ Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6. ● The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Tall Building Zone, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> ● The indicative capacity in the Plan was attained through a masterplanning exercise that took account of the site's characteristics and the need to re-provide new homes and social infrastructure within the South Kilburn estate. Dwelling mix will be based on assessed local housing needs and will be configured during the procurement and pre-application process by the project team within the Council. Subsequent to this the SK team have indicated the site will deliver 72 dwellings. ● The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. ● Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocation will be subject to modifications to ensure it is consistent with the number and delivery timing identified within the updated trajectory.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> ● 2017 SHLAA ● Brent Core Strategy (South Kilburn Growth Area) ● South Kilburn SPD 2017 (SPD_012- SPD_15) ● IIA - Site Allocation Assessments ● Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified and informed by land ownership on the site allocation page.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (parts 1 and 4 in the evidence base, refs SPD_012 and SPD_015)</p>
<p>Is the allocated site deliverable?</p>
<p>This site is considered deliverable as it is within Growth Area with development coming forward in surrounding area. It also has a suitable PTAL 3. The site is</p>

in public ownership and has been identified by the SK Team to deliver by 2029/30.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

- The site falls within Tall Building Zone. Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). However, appropriate general heights are stated in detail under each 'Areas of search' for tall buildings (6. South Kilburn).
- In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context.
- Consistent with that, due to the lower heights in the adjacent north and south, the SSA policy suggests that the building height should be of a lower contextual height of 4-7 storeys with relation to the nearby terrace of listed houses and also the new school which would be north of the new block.

Have all the site constraints, development mix and viability considerations been taken into account?

As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015. It will also deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSESA8 - Hereford and Exeter

Are the criteria in the allocations policy necessary, relevant and deliverable?

- Site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017.
- The criteria in the allocation are relevant to the regeneration of South Kilburn as in the adopted masterplan and SPD. Furthermore, the criteria allow broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The development to be sympathetic to locally listed buildings to 71 Cambridge Road is located adjacent the site to the north east, required by the Tall Building Strategy and supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).

<ul style="list-style-type: none"> ○ Providing open space and adopting urban greening measures and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02). ○ Transport infrastructure consideration to assist in Brent’s Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent’s Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04). ○ An air quality positive approach in line with emerging London Plan Policy SI1 ○ Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6. ● Deliverability is established in the project delivery model already being used. The criteria are also deliverable as this site is supported through the site’s location within the South Kilburn GA, Tall Building Zone, Brent’s IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> ● The indicative capacity in the Plan was originally attained through a masterplanning exercise that took account of the site’s characteristics and the need to re-provide new homes and social infrastructure within the South Kilburn estate. Dwelling mix will be based on assessed local housing needs and will be configured during the procurement and pre-application process by the project team within the Council. The site has been subject to pre-application discussions and consequently the capacity amended to 228 dwellings (net 61). ● The figure is identified as indicative and is included in the housing trajectory. The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocation will be subject to modifications to ensure it is consistent with the number and delivery timing identified within the updated trajectory.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Yes, the site’s characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> ● 2017 SHLAA ● Brent Core Strategy (South Kilburn Growth Area) ● South Kilburn SPD 2017 (SPD_012- SPD_15) ● IIA - Site Allocation Assessments ● Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified and informed by land ownership on the site allocation page.</p>

Are the detailed requirements for each site clear and justified?

The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (parts 1 and 3 in the evidence base, refs SPD_012 and SPD_014)

Is the allocated site deliverable?

This site is considered deliverable as it is within Growth Area with high density development coming forward in surrounding area. It also has a high PTAL 6. The site is in public ownership and development is expected to commence between 2021-22; within the early part of the plan period.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

- The site falls within Tall Building Zone. Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). However, appropriate general heights are stated in detail under each 'Areas of search' for tall buildings (6. South Kilburn).
- In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context.
- Consistent with that, due to the lower heights in the adjacent north and south, the SSA policy suggests that the building height should mediate between 4-12 storeys and should respect the nearby Conservation Area and the prevailing height of the surrounding area.

Have all the site constraints, development mix and viability considerations been taken into account?

Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:

- 2017 SHLAA
- Brent Core Strategy (South Kilburn Growth Area)
- South Kilburn SPD 2017 (SPD_012- SPD_15)
- IIA - Site Allocation Assessments

Tested positive through the Sustainability Appraisal

Site allocation: BSESA9 – Kilburn Park Junior School

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site falls within the South Kilburn Growth Area (GA), identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017. The criteria are relevant as it allows consideration of need at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy D1/SD10

<ul style="list-style-type: none"> ○ Providing open space and adopting urban greening measures and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 ○ Brent's Open Space, Sports and Recreation Study (EB_GI_02) identified South Kilburn as an area with open space deficiency. This provision responds to the new developments coming forward in this area and fills the gap with high quality public realm, a wider and safe open space. • The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
NA
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
Yes, the site's characteristics and the use proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation: <ul style="list-style-type: none"> • Brent Core Strategy (South Kilburn Growth Area) • South Kilburn SPD 2017 (SPD_012- SPD_15) • Brent's Open Space, Sports and Recreation Study (EB_GI_02) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
The site is correctly identified and informed by land ownership on the site allocation page.
Are the detailed requirements for each site clear and justified?
The allocation policy includes clear justification. Please also see the South Kilburn SPD (SPD_015).
Is the allocated site deliverable?
Yes as part of the school's relocation elsewhere within the South Kilburn Estate
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
NA
Have all the site constraints, development mix and viability considerations been taken into account?
NA

Site allocation: BSESA10 - Neville & Winterleys

Are the criteria in the allocations policy necessary, relevant and deliverable?

- Site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and

subsequently updated, after extensive consultation and community engagement, in 2017. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,

- Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy GG4/D1/H1/SD10
- Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- An air quality positive approach in line with emerging London Plan Policy SI1
- Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.
- Active frontage as required by London Plan Policy D3/GG1.
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Tall Building Zone (core), Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The indicative capacity in the Plan was originally attained through a masterplanning exercise that took account of the site's characteristics and the need to re-provide new homes within the South Kilburn estate. Dwelling mix is based on assessed local housing needs. Capacity will now be amended based on a planning application for the site. This is for 135 gross or 63 dwellings net.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The site capacity reflects a full planning permission (ref: 18/4920). The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocations will be subject to modification to ensure it is consistent with the number and delivery timing identified within the updated trajectory.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:

- 2017 SHLAA

<ul style="list-style-type: none"> • Brent Core Strategy (South Kilburn Growth Area) • Tall Building Zone (Tall Building Strategy) • South Kilburn SPD 2017 (SPD_012- SPD_15) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
The site is correctly identified and informed by land ownership and full planning application.
Are the detailed requirements for each site clear and justified?
The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (part 4 in the evidence base)
Is the allocated site deliverable?
The site is in public ownership and development has commenced; it is currently being delivered. Planning permission ref 18/4920
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
<ul style="list-style-type: none"> • The site falls within Tall Building Zone core, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core. However, appropriate general heights are stated in detail under each 'Areas of search' for tall buildings (6. South Kilburn). • In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context. • Consistent with that, the SSA policy suggest that development should take influence from the Albert Road and Bond developments and integrate into the new layout. Recommending around 2-9 storeys with the building height stepping down to respect the relation to neighbouring buildings and facilitate daylight/sunlight to the buildings.
Have all the site constraints, development mix and viability considerations been taken into account?
As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015.

Site allocation: BSESA11 - Old Granville Open Space

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The allocation is justified within the policy 'justification' paragraph and is expanded upon within the South Kilburn SPD. The current open space is of poor quality in terms of leisure amenity.
- The relevance is that the adjoining developments at 111-149, and 21-53 Granville Road, frame the site on 2 sides and provide accommodation of 3-5 storeys height. The play space can be reprovided via the redevelopment of Hereford and Exeter House, in a

higher quality format and with greater accessibility. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,

- Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy GG4/D1/H1/SD10
- Adopting urban greening measures and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Brent's Open Space, Sports and Recreation Study (EB_GI_02)
- The development to be sympathetic to locally listed buildings to South Kilburn Conservation Area located on the northern boundary. This is required by the Tall Building Strategy and supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
- Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- An air quality positive approach in line with emerging London Plan Policy SI1
- Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6 /SI5.
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Tall Building Zone, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The original site capacity of 10 was attained through a masterplanning exercise that took account of the site's characteristics and the need to re-provide new homes within the South Kilburn estate. Dwelling mix will be based on assessed local housing needs and will be configured during the procurement and pre-application process by the project team within the Council. This has been revised in association with Hereford and Exeter pre-application to 20 dwellings.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocations will be subject to modifications to ensure that they are consistent with the number and delivery timing identified within the updated trajectory.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:

- 2017 SHLAA
- Brent Core Strategy (South Kilburn Growth Area)
- Tall Building Zone (Tall Building Strategy)
- South Kilburn SPD 2017 (SPD_012- SPD_15)
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

The site is correctly identified and informed by land ownership on the site allocation page.

Are the detailed requirements for each site clear and justified?

The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (part 4 in the evidence base)

Is the allocated site deliverable?

This site is considered deliverable as it is within Growth Area with development coming forward in surrounding area. It also has a good PTAL 5. The site itself is in public ownership, however the re-aligning of Granville Road would involve the re-purchase of the part of the road previously bought by and subsumed into the private school opposite. Council officers would work together with land owners as we have done in the past, to assemble the land required for development.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

- The site falls within Tall Building Zone. Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). However, appropriate general heights are stated in detail under each 'Areas of search' for tall buildings (6. South Kilburn).
- In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context.
- Consistent with that, with regards to the amenity of those to the rear in Princess Road and due to the lower heights in the surrounding and the conservation area, the SSA policy suggests that the building height should be of a lower contextual height of 4 storey and below with margin to add 1 more storey consistent to the prevailing height of the area.

Have all the site constraints, development mix and viability considerations been taken into account?

As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard

procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015.

Site allocation: BSESA12 - Wordsworth, Masefield and part of S Kilburn open space

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The South Kilburn growth project includes a significant net increase in the number of dwellings. This densification requires social infrastructure including a higher school capacity to allow for the increased children as a result of the densification. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - Adopting urban greening measures such as retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2
 - Re-providing existing MUGA linked to the Kilburn Park Junior School in line with Brent’s Open Space, Sports and Recreation Study (EB_GI_02)
 - The provision of social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy S1 and Brent’s Core Strategy for South Kilburn Growth Area.
 - Transport infrastructure consideration to assist in Brent’s Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent’s Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - An air quality positive approach in line with emerging London Plan Policy SI1
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site’s location within the South Kilburn GA, Tall Building Zone, Brent’s IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- Not relevant as the site would be a new school. It is acknowledged that 40 housing units are lost via this allocation (identified in the proposed modifications (MM162), and this will be re-provided elsewhere in the scheme. During re-development, all existing tenants are temporarily housed in suitable housing prior to being rehoused in new council units within the Growth Area.

<ul style="list-style-type: none"> • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
The provision of a new school within the South Kilburn Growth Area is justified within the South Kilburn SPD; there is more detailed justification in 'Development Principles' - part 3.- SPD_015 in the evidence base.
Is the extent of each site correctly identified?
The site is correctly identified and informed by land ownership on the site allocation page.
Are the detailed requirements for each site clear and justified?
The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (part 4 in the evidence base, SPD_015)
Is the allocated site deliverable?
<ul style="list-style-type: none"> • The new school (infants and juniors) will provide a modern fit-for-purpose learning environment, re-provide the facilities of the existing schools, and integrate the new building into the street network. The current 1960s concrete blocks relate poorly to the surrounding street network and are of poor architectural quality. • The site itself is in public ownership, and Council officers would work together with the Department for Education (it is anticipated) on the more detailed design for the new school.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The site is within the Tall Buildings zone. However the height advice (3 storey with modest increases for a small amount of staff housing) is mindful of the purpose as an infants and junior school and the requirement for natural light and a positive learning environment. The allocation has been compiled considering its position and the guidance on density within the London Plan and London SHLAA.
Have all the site constraints, development mix and viability considerations been taken into account?
Yes, the school design had input from the head teachers of the school during the masterplan process and takes account of the characteristics of the existing open space which will be incorporated into the design as best as possible. Discussions have been on-going with the DfE about potential funding of the school, whilst the potential inclusion on site opens up potential for cross-subsidisation in part.

Site allocation: BSESA13 - John Ratcliffe House

Are the criteria in the allocations policy necessary, relevant and deliverable?

The redevelopment is part of the South Kilburn Regeneration project. The site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A

Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,

- Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy GG4/D1/H1/SD10
- Adopting urban greening measures and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Brent’s Open Space, Sports and Recreation Study (EB_GI_02)
- Transport infrastructure consideration to assist in Brent’s Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent’s Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- An air quality positive approach in line with emerging London Plan Policy SI1
- Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/SI5/SI12.
- Active frontage as required by London Plan Policy D3/GG1.
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site’s location within the South Kilburn GA, Tall Building Zone, Brent’s IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site capacity has been attained through a masterplanning exercise that took account of the site's characteristics and the need to re-provide new homes and parking within the South Kilburn estate. Dwelling mix will be based on assessed local housing needs and will be configured during the procurement and pre-application process by the project team within the Council.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The housing trajectory has been updated to provide current known capacity on sites (August 2020). The site allocations will be subject to modifications to ensure that they are consistent with the number and delivery timing identified within the updated trajectory.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:

- Brent Core Strategy (South Kilburn Growth Area)
- Tall Building Zone (Tall Building Strategy)
- South Kilburn SPD 2017 (SPD_012- SPD_15)
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

The site is correctly identified and informed by land ownership on the site allocation page.

Are the detailed requirements for each site clear and justified?

The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (part 4 in the evidence base, SPD_015)

Is the allocated site deliverable?

- This particular site will be redeveloped to less height, 5-7 storeys, and will entail a smaller number of homes, however the reconfiguration of the site would remove the 'dead space' from around it, that encourages ASB, by moving this to a more usable central courtyard, and would also provide a more suitable housing mix as part of the wider masterplan intent.
- The site is in public ownership. As part of the redevelopment there is a 'decant strategy' that involves either re-housing in nearby new units in the South Kilburn growth area, or for long leaseholders, compensatory payments. This has resulted in successful delivery of the regeneration so far, with the whole project around halfway through.
- This site is also considered deliverable as it is within Growth Area with development coming forward in surrounding area. It also has a good PTAL 4.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is on the edge of the Tall Building Zone, as such the Tall Building Strategy recommends reducing building heights near to the zone's boundary. This transition supports a general height of 5-7 storeys. As such, consistent with the South Kilburn SPD, the SSA considers the prevailing lower-context height and responding positively to the new developments along Malvern and Kilburn Park Road.

Have all the site constraints, development mix and viability considerations been taken into account?

The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015.

Site allocation: BSESA14 - William Dunbar House /William Saville House

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The redevelopment is part of the South Kilburn Regeneration project. The site is in public ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for

Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017. This particular site will be redeveloped to provide similar height dwellings with a perimeter block that will potentially provide mixed use development along the ground floor towards Carlton Vale.

- The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy GG4/H2/SD10
 - The provision of mixed use/town centre use in order to address the town centre location. In line with emerging London Plan Policy SD6/SD7 and Growth Area.
 - The development to be sympathetic to the Local Heritage Asset supported by Tall Building Strategy and Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Active frontage is required consistent with London Plan Policy D3/GG1.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - An air quality positive approach in line with emerging London Plan Policy SI1
 - Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - Contamination remediation in line with London Plan policy E7.
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Town Centre boundary, Tall Building Zone, Brent's IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The indicative capacity in the draft Plan was attained through a masterplanning exercise that took account of the site's characteristics and the need to re-provide new homes and commercial use within the South Kilburn estate. Subsequent to this the SK are doing more detailed design and have currently identified 197 dwellings, this is reflected in the new trajectory.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The housing trajectory has been updated to

provide current known capacity on sites (August 2020). The site allocation will be subject to modification to ensure it is consistent with the number and delivery timing identified within the updated trajectory.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation: <ul style="list-style-type: none"> • 2017 SHLAA and associated call for sites. • Brent Core Strategy (South Kilburn Growth Area) • Tall Building Zone (Tall Building Strategy) • South Kilburn SPD 2017 (SPD_012- SPD_15) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
The site is correctly identified and informed by land ownership on the site allocation page.
Are the detailed requirements for each site clear and justified?
The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (part 4 in the evidence base, SPD_015)
Is the allocated site deliverable?
<ul style="list-style-type: none"> • The site is in public ownership. As part of the redevelopment there is a 'decant strategy' that involves either re-housing in nearby new units in the South Kilburn growth area, or for long leaseholders, compensatory payments. This has resulted in successful delivery of the regeneration so far, with the whole project around halfway through. • This site is also considered deliverable as it is within Growth Area and town centre boundary with high density development coming forward in surrounding area. It also has a good PTAL 5.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The site is within the core and edge of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core. In addition the strategy recommends reducing building heights near to the zone's boundary outside the core. This transition is supported by the site's town centre location where the strategy (part 4.26) supports a general height of 15m (5 storeys). As such, the SSA considers the tallest height based on its position as a 'gateway site' for the South Kilburn development and recommends 5-9 towards as a general height.
Have all the site constraints, development mix and viability considerations been taken into account?
As part of the regeneration scheme the development will be a jointly funded development between Brent Council and a developer following standard procurement process. It will incorporate full replacement of all social rent units, viability enabled by the inclusion of intermediate / full market value

housing. The site has been viability tested as part of the South Kilburn masterplan exercise. Constraints are documented within the site allocation and evidence base SPD_015.

Site allocation: BSESA15 - UK Albanian Muslim Community and Cultural Centre

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The redevelopment is part of the South Kilburn Regeneration project. The site is in private ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017. The current building is considered poor quality and is at a low density given the PTAL rate and potential heights of adjacent developments. The building presents blank facades to the adjoining public realm. The opportunity exists to develop at a much higher density, particularly if incorporating the adjacent West Kilburn Baptist Church car park whilst maintaining and improving the existing community use.
- The allocation is considered necessary and deliverable, and relevant to the Masterplan and SPD as detailed. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The provision of commercial and social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy E9/S1 and Brent's Core Strategy for South Kilburn Growth Area.
 - The development to be sympathetic to the adjacent Conservation Area consistent with Tall Building Strategy and Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Active frontage is required consistent with London Plan Policy D3/GG1.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - An air quality positive approach in line with emerging London Plan Policy SI1
 - Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - Contamination remediation in line with London Plan policy E7.
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within the South Kilburn GA, Tall Building Zone, Brent's IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

No capacity has been identified as it is for the community group to decide what it wishes to do with the site. Redevelopment would provide for a re-provision of the existing facility plus residential which would cross-subsidise its build, possibly including linkage with the adjacent west Kilburn Baptist Church.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

The provision of a new community use building within the South Kilburn Growth Area is justified within the South Kilburn SPD and the consultative activity undertaken; there is more detailed justification in 'Development Principles' - part 3.- SPD_015 in the evidence base. Further to this, the following evidence base documents have informed the site allocation:

- Brent Core Strategy (South Kilburn Growth Area)
- Tall Building Zone (Tall Building Strategy)
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

The site is correctly identified and informed by land ownership on the site allocation page.

Are the detailed requirements for each site clear and justified?

The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (part 4 in the evidence base, SPD_015) An indicative development capacity has not been identified.

Is the allocated site deliverable?

The site is in private ownership and the community and cultural centre would be incorporated into the new development, which could also incorporate higher storeys of residential development. This site is considered deliverable as it is within Growth Area with high density development coming forward in surrounding area. It also has a good PTAL 5.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is within the core of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views. In addition the strategy recommends reducing building heights near to the zone's boundary. As such, the SSA considers the opportunity exists to create a corner landmark building rising to 6 storeys and possibly higher if incorporating the Baptist Church car park. This is expected to be based on design exercise taking into consideration the future development and sympathetic relationship/overlooking/overshadowing of other buildings.

Have all the site constraints, development mix and viability considerations been taken into account?

Yes, based on viability of adjacent site development, the values generated at South Kilburn potentially allow for the community building to be redeveloped and expanded with residential above to cross-subsidise this if the community group owning the building consider this is an appropriate course of action.

Site allocation: BSESA16 - OK Club (Oxford Kilburn Youth Trust)

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The redevelopment is part of the South Kilburn Regeneration project. The site is in private ownership and part of the South Kilburn Growth Area, identified originally as a regeneration area in 2001 (New Deal for Communities Vision). A Masterplan and SPD were produced in 2005 and subsequently updated, after extensive consultation and community engagement, in 2017. The site has a memorial garden which is much liked by the local community, and the allocation is considered necessary and deliverable, and relevant to the Masterplan and SPD as detailed.
- The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD10
 - The provision of social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy S1 and Brent’s Core Strategy for South Kilburn Growth Area.
 - The development to be sympathetic to the adjacent Conservation Area consistent with Tall Building Strategy and Brent’s Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Active frontage is required consistent with London Plan Policy D3/GG1.
 - Transport infrastructure consideration to assist in Brent’s Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent’s Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - An air quality positive approach in line with emerging London Plan Policy SI1
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - Contamination remediation in line with London Plan policy E7.
 - Adopting urban greening measures and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Brent’s Open Space, Sports and Recreation Study (EB_GI_02)
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site’s location within the South Kilburn GA, Tall Building Zone, Brent’s IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative

only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
No capacity has been identified as it is for the community group to decide what it wishes to do with the site. Redevelopment would provide for a re-provision of the existing facility plus residential which would cross-subsidise its build.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
The provision of a new community use building within the South Kilburn Growth Area is justified within the South Kilburn SPD and the consultative activity undertaken; there is more detailed justification in 'Development Principles' - part 3.- SPD_015 in the evidence base. Provision of 2 new youth centres within South Kilburn was also included in the original site allocation CP9 in the Core Strategy 2010. Further to this, the following evidence base documents have informed the site allocation: <ul style="list-style-type: none"> • Brent Core Strategy (South Kilburn Growth Area) • Tall Building Zone (Tall Building Strategy) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
The site is correctly identified and informed by land ownership on the site allocation page.
Are the detailed requirements for each site clear and justified?
The allocation policy includes clear justification. Please also see the South Kilburn Regeneration Project SPD, 2017. (part 4 in the evidence base, SPD_015) An indicative development capacity has not been identified.
Is the allocated site deliverable?
This site is considered deliverable as it is within Growth Area with high density development coming forward in surrounding area. It also has a good PTAL 4. The site is in Council ownership and is deliverable within the plan period.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The site is within the core of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core, subject to not unacceptably impacting on protected views. However, appropriate general heights are stated in detail under each 'Areas of search' for tall buildings (6. South Kilburn). In line with NPPF and London Plan, part 7.1 of the Strategy recognises that growth needs to be channelled in appropriate locations and in a manner that is sympathetic to Brent's local character. Part 7.6/8.29/8.30 suggests that, consistent with the South Kilburn Masterplan, new buildings will be of a lower scale (2-17 storeys) to better respond to the local context. Consistent with that, due to the lower heights in the surrounding, the SSA policy suggests that the building height should be of a lower contextual height

of 6 storeys that would respond to the buildings opposite on Neville Road as proposed for the Peel development.

Have all the site constraints, development mix and viability considerations been taken into account?

Yes, based on viability of adjacent site development, the values generated at South Kilburn potentially allow for the community building to be redeveloped and expanded with residential above to cross-subsidise this if the community group owning the building consider this is an appropriate course of action.

Site allocation: BSESA17 - Cricklewood Broadway Retail Park (Longley Way)

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is of low density considering its size and PTAL rating. It is identified as a large site within the SHLAA. The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - The current development includes no soft landscaping and the area is covered with hard landscaping / building; this will be exacerbating the flooding problem. Redevelopment of the site is an opportunity to mitigate surface water issues in the immediate locality. Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1.
 - The provision of commercial floorspace in order to address the exiting offer. In line with emerging London Plan Policy E9.
 - Retaining the wildlife corridor and Grade I SINC by adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - An air quality positive approach in line with emerging London Plan Policy SI1
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan GG6/ Policy SI5.
 - Contamination remediation in line with London Plan policy E7.
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site was identified in the London SHLAA 2017 and associated call for sites in the central typology with a PTAL 3/4 density of 210. Site area = 2.3, so total = 483, assuming 5 storeys, minus a ground floor has been estimated at 380 dwellings indicative capacity.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.

<ul style="list-style-type: none"> Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020.
Is the description of the site necessary to be included within the policy wording?
It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.
Is the allocation justified by the evidence base?
The site represents an incongruous addition along this street frontage, consistent with much of the change that has occurred north of the site along Edgware Road. Along much of its length such low intensity developments are being redeveloped in a more intensive way for mixed use purposes. This site provides the opportunity to do the same and it is evident that the site owners wish to bring it forward for redevelopment in this manner. This will assist the Council in meeting its housing needs and improve the environment in this area.
Is the extent of each site correctly identified?
The site is correctly identified and informed by land ownership on the site allocation page.
Are the detailed requirements for each site clear and justified?
The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient.
Is the allocated site deliverable?
The allocation is deliverable over the plan term. The site benefits from pre-apps and full planning application (Ref:20/0115) to be determined. It is for the south part of the site (Matalan store) which if built will deliver 238 units.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The site is not within the tall building zone. Guidance on height and design is compliant with existing policy and guidance and responds to the surrounding main road but also residential streets.
Have all the site constraints, development mix and viability considerations been taken into account?
The Council considers that the site constraints such as the SINC to the north, railway line, surface water flooding, contamination and trees have been identified, with the policy allocation reflecting the potential for on-site re-provision of commercial uses within the overall indicative capacity of the site. There is strong developer interest in the site which has manifested itself in a planning application being submitted since the Local Plan was initially drafted.

Site allocation: BSESA18 - 245-289 Cricklewood Broadway

Are the criteria in the allocations policy necessary, relevant and deliverable?

- As a secondary primary shopping frontage site in an area of PTAL 5, with good facilities, the buildings on the site, which are generally of poor quality and little architectural value, are ideally placed to deliver intensified workspace with residential co-located. The criteria are necessary and relevant as it allows broad design considerations,

infrastructure and assessments to be considered at an early stage. Such as,

- Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
- The replacement of commercial floorspace in a town centre location in order to address the exiting offer. In line with emerging London Plan Policy SD6/SD7.
- Contamination remediation in line with London Plan policy E7.
- Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
- Re-provision of industrial floorspace to assist in meeting Brent's industrial land needs targets set out by West London ELS in line with London Plan policy E4/E7.
- Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within the town centre, Brent's IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site was identified in the 2017 London SHLAA as urban PTAL 5 with a density of 405 dph. The Council considers the urban typology 260 dph more appropriate reflecting the conservation area opposite. A height of 5 storeys on the Cricklewood Broadway frontage is likely to be acceptable, with 2-3 storey on Hassop Road. Broadway frontage - $0.4 \times 260 = 107$. Divide by 5 = 21 dwellings per storey x 3 storeys above the retail/ancillary = 63 dwellings. On the rear Hassop Road $145 \text{ dph} \times 0.16 = 23$. Divide by 3 storeys, multiply by 2 storeys to take account of ground floor industrial = 15 - round up to 80 overall.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

Yes, the site presents a low intensity of building within a town centre with extensive car park. The value of the site, and high PTAL together with the small store format are likely to promote higher intensity of the use of the site, whilst elsewhere in this area single storey employment uses are increasingly subsumed into vertically mixed buildings with residential on upper floors. Further to this, the following evidence base documents have informed the site allocation:

- 2017 SHLAA
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

The site is correctly identified on the site allocation page

Are the detailed requirements for each site clear and justified?

The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient.

Is the allocated site deliverable?

Significant recent interest has been received, progressing the site as a 5-storey development building on the existing structure at the front and redeveloping at the rear consistent with the allocation. The site is in a single ownership. Discussions with the site owner/developer indicates the site is deliverable.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site fall within the town centre boundary allowing a lower scale of taller buildings. As such, part 4.26 and part 8.2 of Tall Building Strategy identifies sites within town centres with acceptable building heights of 15m (5 storeys) with opportunities to go higher at strategic points in town centres. London Plan Policy D8 requires boroughs to define tall buildings based on local context. As such, the SSA considers the prevailing height of 3 storeys of the surrounding area and for the indicative height to not adversely impact the surrounding street and the nearby Conservation Area over the road in borough of Barnet.

Have all the site constraints, development mix and viability considerations been taken into account?

No site specific viability assessment has been undertaken. However, taking account of similar development opportunities along this street in Brent, Barnet and Camden, the site's position close to Cricklewood station, the features of the site and degree of interest indicate that it will be viable for development. Desired development mix is laid out in Policy BH6. Site constraints are noted in the allocation policy.

Site allocation: BSESA19 – Gaumont State Cinema

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is brought forward from the 2013/2017 SHLAA and associated call for sites. The Gaumont State cinema is a Grade II* listed Art Deco building with only part of the building being used as a Church. The criteria are relevant as it allows broad design considerations,

<p>infrastructure and assessments to be considered at an early stage. Such as,</p> <ul style="list-style-type: none"> ○ The re-use/alterations to be sympathetic to the Grade II* listed building, adjacent Brondesbury Mews which has a terrace of Locally Listed Buildings and the potential extension of the Kilburn Conservation Area as supported by London Plan Policy HC1 and Brent’s Historic Environment Place-Making Strategy 2019 (EB_HC_01). ○ Supporting continued evolution of London’s diverse cultural facilities in line with London Plan Policy HC5. <ul style="list-style-type: none"> ● The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<p>NA</p>
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Yes, the site's characteristics and the development proposed were thoroughly considered through the masterplan exercise. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> ● 2013 SHLAA, 2017 SHLAA and associated call for sites. ● Retail and Leisure Needs Study (EB_E_01-07) ● Brent’s Infrastructure Delivery Plan ● IIA - Site Allocation Assessments ● Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>The site is correctly identified and informed by land ownership on the site allocation page.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>The allocation policy includes clear justification.</p>
<p>Is the allocated site deliverable?</p>
<p>The site is deliverable as this is supported through the site’s location within within Kilburn Major Town Centre and high PTAL 4-6, Brent’s IDP, Local Plan Viability Assessment 2019.</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>NA</p>
<p>Have all the site constraints, development mix and viability considerations been taken into account?</p>
<p>No site specific viability assessment has been undertaken. However, taking account of similar development opportunities along this street in Brent, Barnet and Camden, the site's position close to Cricklewood station, the features of the site and degree of interest indicate that it will be viable for re-use/re-development. Desired development mix is laid out in Policy BH6.</p>

Site allocation: BSESA20 - Kilburn Square & Markets

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The existing market and premises are dated and do not make sufficient use of the land. The necessity of a housing allocation on the site is the requirement for a higher level of density to be delivered in higher PTAL locations such as this town centre location. The constraints of the site, as detailed in 'planning considerations', are recognised. It is considered possible, relevant and necessary to deliver a welcoming, modern and flexible market square with residential accommodation at higher levels and commercial, active frontage at ground level.
- The criteria are necessary and relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports wider regeneration and ensure that development proposals integrate into the surrounding areas in line with emerging London Plan GG4 and Policy H1/D1/SD10
 - The provision retail in a town centre location in order to address the existing offer. In line with emerging London Plan Policy SD6/SD7.
 - The development to be sympathetic to the adjacent locally listed building and adjacent Conservation Area consistent with Tall Building Strategy and Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Active frontage is required consistent with London Plan Policy D3/GG1.
 - Manage impacts and protect SINC site by adopting urban greening measures and other biodiversity measures as identified in London Plan Policy G6/G5, Plan Policy BGI2 and Brent's Open Space, Sports and Recreation Study (EB_GI_02)
 - Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5.
 - In line with London Plan Policy D13, incorporation of noise mitigation in design developments.
 - Active frontage is required consistent with London Plan Policy D3/GG1.
- The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
- The site is deliverable as this is supported through the site's location within within Kilburn Major Town Centre and high PTAL 6, Brent's IDP, Local Plan Viability Assessment 2019.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

<ul style="list-style-type: none"> • The site was identified in the 2017 London SHLAA as urban PTAL 5 with a central density of 355 dph. The Council considers the urban typology 260 dph more appropriate reflecting the character opposite. A height of 5 storeys on the Kilburn High Road and Brondesbury Road frontages is likely to be acceptable. 260×0.84 site area, divide by 5 = 44 dwellings per storey x 3 storeys above the retail and medical centre = 131 dwellings - loss of dwellings on Kilburn High Road frontage (16) = 115 dwellings. • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Yes, the site presents a frontage of limited architectural quality that is an incongruous addition along this street, with an extensive top floor car park, which in an area with such high PTAL is now inappropriate. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2013 SHLAA, 2017 SHLAA and associated call for sites. • Retail and Leisure Needs Study (EB_E_01-07) • Tall Building Strategy (town centre location) • Brent's Infrastructure Delivery Plan • IIA - Site Allocation Assessments <p>Tested positive through the Sustainability Appraisal</p>
<p>Is the extent of each site correctly identified?</p>
<p>The site is identified within the Development Plans map, within Core_06, within the evidence base. The allocation still requires to be illustrated as a map within the draft Brent Local Plan.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient.</p>
<p>Is the allocated site deliverable?</p>
<p>The site is a mixture of public and private ownership. A series of planning applications to refurbish only the shopfronts and increase the upstairs retail space have been received over the years, the last of which is very recent. The Council is seeking a more significant change on the frontage to add new dwellings. In addition the rear part of the site which is public land has been subject to appraisal for development of social rent and other affordable dwellings, similar to the schemes delivered further along Brondesbury/Algernon Road on this estate and improvements to the existing block and communal space. This indicates that at the very least the indicative capacity will be delivered on this site.</p>

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site fall within the town centre boundary allowing a lower scale of taller buildings. As such, part 4.26 and part 8.2 of Tall Building Strategy identifies sites within town centres with acceptable building heights of 15m (5 storeys) with opportunities to go higher at strategic points in town centres. London Plan Policy D8 requires boroughs to define tall buildings based on local context. As such, the SSA considers the prevailing height of the surrounding area and for the indicative height to not adversely impact the surrounding street and consider character, setting and the form and scale of neighbouring buildings.

Have all the site constraints, development mix and viability considerations been taken into account?

No site specific viability assessment has been undertaken. However, taking account of similar development opportunities along this street in Brent, Barnet and Camden, the site's position close to Kilburn station, the features of the site and degree of interest indicate that it will be viable for development. Desired development mix is laid out in Policy BH6. Site constraints are noted in the allocation policy.

Site allocation: BSESA21 - Willesden Green Sainsbury's and Garages (NW10 2TD)

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The criteria are deliverable as it is a town centre site identified in the 2017 SHLAA with high PTAL.
- The criteria are necessary as the site is currently underutilised with large amounts of land dedicated to car parking. It is a large site in a residential area which could provide significant uplift in housing. The site is well serviced with a variety of stores along the High Road to the north and within close walking distance to transport facilities, making it a sustainable location for residential development. The site has low landscape value and would benefit from the introduction of greenery. This could also help mitigate surface water flood risk.
- The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Deliver suitable housing by meeting borough and London wide targets consistent with London Plan GG4 and Policy H1/D1
 - The provision retail in a town centre location in order to address the exiting offer. In line with emerging London Plan Policy SD6/SD7.
 - Maximise provision of industrial floorspace to assist in meeting Brent's industrial land needs targets set out by West London ELS in line with London Plan policy E4/E7.
 - The development to be sympathetic to the adjacent Willesden Town Centre Conservation Area consistent with Tall Building Strategy and Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan

<p>Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).</p> <ul style="list-style-type: none"> ○ Contamination remediation in line with London Plan policy E7 ○ Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6/ SI5. ○ Transport infrastructure consideration to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04). <ul style="list-style-type: none"> ● The criteria are relevant taking into account community engagement and stakeholder representation through Reg 18/Reg 19 consultations.
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> ● The site was identified in the 2017 London SHLAA as central standard density of 210 dph. The Council considers that as with other larger supermarket sites that a closure of the store and completed redevelopment is less likely than development on parts of the car park and commercial unit site. Redevelopment of 1/2 the car park and industrial unit area generates $0.29 \times 210 = 61$ dwellings. Ground floor of 5 storey building used for non-residential (car park/commercial) = $61 \times 0.8 = 49$ - round up to 50 dwellings. ● The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. ● Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>Yes, the site presents a low intensity of building within a town centre with extensive car park. The value of the site, and high PTAL together with the small store format are likely to promote higher intensity of the use of the site, whilst elsewhere in this area single storey employment uses are increasingly subsumed into vertically mixed buildings with residential on upper floors. Further to this, the following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> ● 2013/2017 SHLAA and associated call for sites. ● Tall Building Strategy(town centre location) ● South Kilburn SPD 2017 (SPD_012- SPD_15) ● IIA - Site Allocation Assessments ● Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>The site is identified within the Development Plans map, within Core_06, within the evidence base. The allocation still requires to be illustrated as a map within the draft Brent Local Plan.</p>
<p>Are the detailed requirements for each site clear and justified?</p>

The Site Allocation includes Planning Considerations, Design Principles and infrastructure requirements as they relate to the site. Each of these have been identified through a thorough assessment of the site, and in consultation with the relevant stakeholders. These have been written clearly, and justified further in the Justification field. These are seen to be relevant and sufficient.

Is the allocated site deliverable?

The site is within private ownership. This site is considered deliverable as it is within town centre with a good PTAL 4. It is considered however that the site would be deliverable within the plan period considering its location.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site fall within the town centre boundary allowing a lower scale of taller buildings. As such, part 4.26 and part 8.2 of Tall Building Strategy identifies sites within town centres with acceptable building heights of 15m (5 storeys) with opportunities to go higher at strategic points in town centres. London Plan Policy D8 requires boroughs to define tall buildings based on local context. As such, the SSA considers proximity of surrounding low density housing, being sure not to overshadow.

Have all the site constraints, development mix and viability considerations been taken into account?

No site specific viability assessment has been undertaken. However, taking account of similar development opportunities, the features of the site indicate that it will be viable for development. Desired development mix is laid out in Policy BH6. Site constraints are noted in the allocation policy.

Other site allocations

Site allocation: BSESA22 - Queen's Parade

Are the criteria in the allocations policy necessary, relevant and deliverable?

Town centre, primary frontage site identified in the 2017 SHLAA, high PTAL. The site is currently underutilised at 1-storey, and with heights around up to 7, and high PTAL, the allocation seems reasonable. The site is well serviced with a variety of stores along the High Road to the north and within close walking distance to transport facilities, making it a sustainable location for residential development.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. The figure is identified as indicative and is included in the housing trajectory. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23,250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified need for 66,000 additional homes per year. The development will contribute around 100 new dwellings. This site was identified in the London Plan SHLAA (ref: 17050095). The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base.

Is the extent of each site correctly identified?

The site is correctly identified within the Development Plans map, within Core_06, within the evidence base and will be live on the interactive map. As one of the smaller sites, less information is included within the Local Plan.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

The site is within private ownership. It is considered however that the site would be deliverable within the plan period considering its location and land value. Interest in the form of an application was received however did not proceed due to failure to complete the S106 agreement.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within the tall building zone. Guidance on height and design is compliant with existing policy and guidance and responds to the surrounding street context.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. However viability is not fixed at the time of the compilation of the plan. It will depend upon the benchmark land value, gross development value and development costs. It is not the role of the authority to establish viability in detail for every site, as developers are instigating the development process and deriving the profit from the proposal. However the position, features of the site and degree of interest indicate that it would be viable. Desired development mix is laid out in Policy BH6. Site constraints are noted in the allocation policy and are considered in more detail when pre-application advice is compiled.

Site allocation: BSESA23 - Former Willesden Green Police Station, NW10 2PP

Are the criteria in the allocations policy necessary, relevant and deliverable?

The overall site is in poor state of repair to the rear and the 1960s residential development on site of limited architectural merit. The main police building itself retains much of its character externally and makes a positive contribution the character and appearance of the area and the heritage asset of the Willesden Green Conservation area. An application is pending committee and legal agreement currently.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

The London-wide Strategic Housing Market Assessment (SHMA) has identified a need across London for 66,000 additional homes per year. Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23,250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The development will contribute around 100 new dwellings.

Is the extent of each site correctly identified?

The site is correctly identified within the Development Plans map, within Core_06, within the evidence base and will be live on the interactive map. As one of the smaller sites, less information is included within the Local Plan.

Are the detailed requirements for each site clear and justified?

The site allocation gives requirements and justification for the conservation of the building. These are written clearly.

Is the allocated site deliverable?

An application for 28 units is in the final stages of decision; site is considered deliverable in light of this interest.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within the tall building zone. Guidance on height and design is compliant with existing policy and guidance and responds to the surrounding street context; also within conservation area and nearby listed heritage assets.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. However viability is not fixed at the time of the compilation of the plan. It will depend upon the benchmark land value, gross development value and development costs. It is not the role of the authority to establish viability in detail for every site, as developers are instigating the development process and deriving the profit

from the proposal. Desired development mix is laid out in Policy BH6. Site constraints are noted in the allocation policy; these have been borne in mind in assessment of the case. Pre-application advice was received which enabled the applicants to submit a suitable application.

Site allocation: BSESA25 - Park Ave. Garages, NW2 5TG

Are the criteria in the allocations policy necessary, relevant and deliverable?

Summary: Case 17/5291 allowed at appeal after a recommendation to grant by Brent officers was turned over to refusal at Planning Committee. PTAL 2 but close to PTALS 3 and 4. Within town centre 400m buffer. Part of extension proposed to Willesden Green conservation area, and nearby listed building. Criteria were not given specifically as this was not previously a site allocation.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

Capacity was not originally identified; 50 was specified; original app was for 70 but there has since been a granted application to remove the specificity of unit numbers and mix from the application, most likely in advance of a S73 amendment application.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23,250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year. The development will contribute between 1 and 2 new dwellings.

Is the extent of each site correctly identified?

The site is correctly marked on the interactive map, evidence base Core_06 (b)

Are the detailed requirements for each site clear and justified?

Detailed requirements are not given as the allocation reflects a granted permission.

Is the allocated site deliverable?

The effort and expense put in by the developer in pursuing and winning the appeal would indicate that they consider the proposal deliverable.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within the tall buildings zone.

Have all the site constraints, development mix and viability considerations been taken into account?

Taken into account in the Council's original recommendation of grant and the Planning Inspectorate's appeal decision.

Site allocation: BSESA26 - Park Avenue North Substation, NW2 4PY

Are the criteria in the allocations policy necessary, relevant and deliverable?

Site is adjacent to BSESA25. Therefore it has some similar characteristics. There is no previous planning application however and it is not within a conservation area. The recommended type of development is considering the surrounding typology which is mostly 2 storey houses.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

Capacity has been identified taking into account the nearby allowed appeal, and surrounding typology. The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23,250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year. The development will contribute between 50 and 70 new dwellings. This site was identified in the London Plan SHLAA (ref: 17050208). The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base.

Is the extent of each site correctly identified?

The site is correctly marked on the interactive map, evidence base Core-06 (b). Note Land parcel is 202059458, address on LGPR is 'L T Transformer Station, Park Avenue North, London'.

Are the detailed requirements for each site clear and justified?

Requirements are given in broad terms (number of units 2, residential, potential for self-build)

Is the allocated site deliverable?

Potential for self-or custom build is considered reasonable; the land required for the substation is a small proportion of the site. Access would be from Elvis Road side (north of the railway)

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Not in the tall buildings zone, so this doesn't apply.

Have all the site constraints, development mix and viability considerations been taken into account?

The allocation is considered reasonable taking into account the position near a town centre, reasonable PTAL (3) and position nearby of other residential dwellings that appear to have been constructed in the last 30 years. Trees mentioned.

Site allocation: BSESA27 - Car Wash Strode Road, NW10 2NN

Are the criteria in the allocations policy necessary, relevant and deliverable?

Town centre buffer zone, PTAL 5, surrounding residences, not conservation area.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

Capacity has been identified taking into account the surrounding typology and GLA guidance on density.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23,250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year. The development would be likely to contribute 10 new dwellings. The allocation is part of a larger 2017 SHLAA allocation, ref: 17050322. The site put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base.

Is the extent of each site correctly identified?

The site is correctly marked on the interactive map, evidence base Core-06 (b). Land parcel 202042594.

Are the detailed requirements for each site clear and justified?

Requirements are given in broad terms (number of units 4, residential, potential for self-build)

Is the allocated site deliverable?

The site is in a good area for residential development that would be attractive to a developer.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Not in the tall buildings zone, so this doesn't apply.

Have all the site constraints, development mix and viability considerations been taken into account?

The allocation is considered reasonable taking into account the position near town centre, good PTAL (5) and position nearby of other residential dwellings. The corner position and nature of adjacent property to rear would mean a number of 4 flats would be likely to be achievable.

Site allocation: BSESA28 - 80 Strode Road, NW10 2NH

Are the criteria in the allocations policy necessary, relevant and deliverable?

Town centre buffer zone, PTAL 5, surrounding residences, not conservation area. Currently in use as 2 warehouses, although 1 appears to be housing film production business or associated services.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

Capacity has been identified taking into account the surrounding typology and GLA guidance on density. The industrial use would need to be included as part of any proposal, as this is a Local Industrial Site.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23,250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year. The development would be likely to contribute 4 new dwellings.

Is the extent of each site correctly identified?

The site is identified within the Development Plans map, within Core_06, within the evidence base. The address (according to LGPR) should be adjusted to 'warehouse next to 80 Strode Road and premises rear of 82 and 84 Strode Road'. LGPR refs 202042610, 202201018, and 202042592

Are the detailed requirements for each site clear and justified?

Requirements are given in broad terms (number of units 4, residential, potential for self-build)

Is the allocated site deliverable?

It is considered that due to the positive features of the site, i.e. position, access, size, it would be deliverable within the plan period.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Not in the tall buildings zone, so this does not apply.

Have all the site constraints, development mix and viability considerations been taken into account?

The allocation is considered reasonable taking into account the position near town centre, good PTAL (5) and position nearby of other residential dwellings. The corner position and nature of adjacent property to rear would mean a number of 10 flats would be likely to be achievable.

Site allocation: BSESA29 - Willesden Telephone Exchange, 50 Harlesden Road, NW10 2BX

Are the criteria in the allocations policy necessary, relevant and deliverable?

Within town centre buffer zone. PTAL 3. Surrounding context of 3 -4 storeys would allow the indicated area of development. Not conservation area.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.
Is the description of the site necessary to be included within the policy wording?
As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.
Is the allocation justified by the evidence base?
Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23,250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. The London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year. The development would be likely to contribute 20 new dwellings and replacement industrial space. This site was identified in the London Plan SHLAA (ref: 17050344). The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base.
Is the extent of each site correctly identified?
The site is identified within the Development Plans map, within Core_06, within the evidence base.
Are the detailed requirements for each site clear and justified?
Requirements are given in broad terms (number of units 10, residential, requirement for industrial space)
Is the allocated site deliverable?
BT has an ongoing programme to consolidate into 30 major locations and cut costs. It is likely that a site such as this would be profitable for development and suitable for sale. https://www.theguardian.com/business/2019/jun/05/bt-to-close-offices-in-more-than-270-uk-locations
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
Not in the tall buildings zone, so this does not apply.
Have all the site constraints, development mix and viability considerations been taken into account?
The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. However viability is not fixed at the time of the compilation of the plan. It will depend upon the benchmark land value, gross development value and development costs. It is not the role of the authority to establish viability in detail for every site, as developers are instigating the development process and deriving the profit from the proposal. However the position, features of the site and degree of interest indicate that it would be viable. Desired development mix is laid out in Policy BH6. Site constraints are noted in the allocation policy and are considered in more detail when pre-application advice is compiled. The allocation is considered reasonable taking into account the position near town centre, reasonable PTAL (3) and heights of other surrounding buildings.

**Site allocation: BSESA30 - 61-65 Shoot Up Hill, London, NW2
3PS**

Are the criteria in the allocations policy necessary, relevant and deliverable?

This site, on a main road and in a predominantly residential area, is on the gateway into Kilburn and in an area of PTAL 5. The surrounding typology suggests a more urban environment, with 5 to 6 storeys being the prevalent height, and graceful mid-century and Edwardian mansion blocks being significant architectural style features. The site is underdeveloped in its current format, and would lend itself to denser development.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year across London. The development would contribute around 20 new dwellings.

Is the extent of each site correctly identified?

Yes, the site is marked on the interactive map as a potential site allocation.

Are the detailed requirements for each site clear and justified?

Requirements are given in broad terms (number of units 10, residential, requirement for Doctors' surgery)

Is the allocated site deliverable?

The site is in private ownership however Brent officers would work in partnership with developers on land assembly.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within the tall buildings zone and is adjacent to the Brondesbury conservation area.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. However viability is not fixed at the time of the compilation of the plan. It will depend upon the benchmark land value, gross development value and development costs. It is not the role of the authority to establish viability in detail for every site, as developers are instigating the development process and deriving the profit

from the proposal. However the position, features of the site and degree of interest indicate that it would be viable. Desired development mix is laid out in Policy BH6. Site constraints are noted in the allocation policy and are considered in more detail when pre-application advice is compiled. The allocation is considered reasonable taking into account the position near town centre, good PTAL (5) and position nearby of other residential dwellings, and nearby conservation area.

Site allocation: BSESA31 - Turpin's Yard, Oakland Road, London, NW2 6LL

Are the criteria in the allocations policy necessary, relevant and deliverable?

The site is of low density and is in a predominantly residential area of PTAL 4 and in the town centre buffer zone. Currently large areas are given over to parking and considering it is in a critical drainage area, redevelopment of the site to incorporate surface water flood mitigation and some soft landscaping would be welcomed. Past applications indicate a piecemeal approach to development on the site, not indicating any future intention to preserve the workspace elements. A more holistic approach to the site incorporating affordable workspace would build on the character of the area as a creative quarter and help the site reach its full potential.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year across London. This site was identified in the London Plan SHLAA (ref: 17050279). The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. The development would contribute around 8 new dwellings plus affordable workspace.

Is the extent of each site correctly identified?

Yes, the site is marked on the interactive map as a potential site allocation.

Are the detailed requirements for each site clear and justified?

Requirements are given in broad terms (number of units 8, requirement for affordable workspace)

Is the allocated site deliverable?

The owners of the site have made several applications for residential development. Historically, there was a grant of planning permission for 20 units (in 2003). Subsequent to that there are three prior approval cases, including an allowed appeal for 2 flats and a granted prior approval for one house. The Authority would welcome more comprehensive development of the site, however due to surrounding residential gardens this is constrained to 2 storeys.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within the tall buildings zone. Considering the heights that would be acceptable for neighbour amenity, the conservation area on the other side of Chichele Road is unlikely to be a constraining factor.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. However viability is not fixed at the time of the compilation of the plan. It will depend upon the benchmark land value, gross development value and development costs. It is not the role of the authority to establish viability in detail for every site, as developers are instigating the development process and deriving the profit from the proposal. However the position, features of the site and degree of interest indicate that it would be viable. Desired development mix is laid out in Policy BH6. The allocation is considered reasonable taking into account the position near town centre, good PTAL (4) and position nearby of other residential dwellings.

Site allocation: BSESA32 - 45-55 Cricklewood Broadway, London, NW2 3JX

Are the criteria in the allocations policy necessary, relevant and deliverable?

The terrace of six premises, at a storey in height less than the surrounding development, create a gap in the building line, and also are not of similar architectural interest or quality to the buildings adjacent to it. With PTAL 5, in a town centre location, the terrace is capable of higher density whilst still retaining the commercial ground floor premises, and also, restoring the historic shopfront character which is characteristic of this elegant, tree-lined portion of the Cricklewood Broadway. The terrace would be part of the proposed extension to the Mapesbury conservation area and any proposal would need to reflect that designation (if it is adopted).

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year across London. This site was identified in the London Plan SHLAA (ref: 17050274). The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. The development would contribute around 10 new dwellings plus ground floor space in the new flexible class E.

Is the extent of each site correctly identified?

Yes, the site is marked on the interactive map as a potential site allocation.

Are the detailed requirements for each site clear and justified?

Requirements are given in broad terms (number of units 10, commercial at ground floor)

Is the allocated site deliverable?

The dentist surgery at no. 55 was recently extended above to add two floors; in addition the mansard roof to no. 53 was a later addition to that building with permission granted in 2009. Therefore, evidently there is some appetite for development upwards in this terrace. Site assembly may be required.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within the tall buildings zone. Considering the heights that would be acceptable for neighbour amenity, the conservation area neighbouring to the rear, surrounding building styles, and possible inclusion in the conservation area, are all matters influencing the allocation.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. However viability is not fixed at the time of the compilation of the plan. It will depend upon the benchmark land value, gross development value and development costs. It is not the role of the authority to establish viability in detail for every site, as developers are instigating the development process and deriving the profit from the proposal. However the position, height of the terrace, and surrounding heights, indicate that it would be a feasible development. Desired development mix is laid out in Policy BH6. The allocation is considered reasonable taking into account the position near town centre, good PTAL (5) and position nearby of other residential dwellings. Noted, that the site is within a small area of architectural interest, marked on the heritage map, as well as in the proposed extension to the Mapesbury CA.

Site allocation: BSESA33 - 123-129 Cricklewood Broadway, London, NW2 3JG

Are the criteria in the allocations policy necessary, relevant and deliverable?

Similar to BSESA32, The terrace of four premises, at a storey in height less than the surrounding development, create a gap in the building line, and also are not of similar architectural interest or quality to the buildings adjacent to it. With PTAL 5, in a town centre location, the terrace is capable of higher density whilst still retaining the commercial ground floor premises, and also, restoring the historic shopfronts and elegant later Victorian detailing which is characteristic of this portion of the Cricklewood Broadway. The terrace would be part of the proposed extension to the Mapesbury conservation area and any proposal would need to reflect that designation (if it is adopted).

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per year across London. This site was identified in the London Plan SHLAA (ref: 17050273). The site was then put through the process of the IIA site sustainability appraisal process. This assessed the site against a range of criteria. The site is therefore seen to be justified by the evidence base. The development would contribute around 12 new dwellings plus ground floor space in the new flexible class E.

Is the extent of each site correctly identified?

Yes, the site is marked on the interactive map as a potential site allocation.

Are the detailed requirements for each site clear and justified?

Requirements are given in broad terms (number of units 12, commercial at ground floor)

Is the allocated site deliverable?

Similar types of extension have taken place elsewhere nearby; see above.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within the tall buildings zone. Considering the heights that would be acceptable for neighbour amenity, the conservation area neighbouring to the rear, surrounding building styles, and possible inclusion in the conservation area, are all matters influencing the allocation.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local

Plan Viability study'; ref. Core_Gen_01 in the evidence base. However viability is not fixed at the time of the compilation of the plan. It will depend upon the benchmark land value, gross development value and development costs. It is not the role of the authority to establish viability in detail for every site, as developers are instigating the development process and deriving the profit from the proposal. However the position, height of the terrace, and surrounding heights, indicate that it would be a feasible development. Desired development mix is laid out in Policy BH6. The allocation is considered reasonable taking into account the position near town centre, good PTAL (5) and position nearby of other residential dwellings.

Site allocation: BSESA34 - Kilburn Park Underground Station

Are the criteria in the allocations policy necessary, relevant and deliverable?

Whilst this site is in South Kilburn Growth Area and has a PTAL of 6a, the station is a Grade II listed building, located within a conservation area and surrounded by other listed buildings. The predominant local character is 3 to 4 storeys. It is considered 12 units is an appropriate indicative capacity which balances the need to optimise housing delivery in sustainable locations with the need to conserve and enhance the historic environment.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. Density was calculated using the 2017 London SHLAA, density matrix and guidance notes. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

It is appropriate to keep all information associated with the site together for clarity. The description of the site does not stipulate any policy requirements.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year.

Is the extent of each site correctly identified?

Yes, the site is marked on the interactive map as a potential site allocation.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

Whilst no specific application has been received for this site, TfL have confirmed to 'My London' website that it has begun work on building 1,400 homes, with 22 applications submitted across London TfL plan to submit applications for another 4500 homes. The appetite is likely to be here for further sites especially bearing in mind TfL's financial situation.
<https://www.mylondon.news/news/local-news/find-out-exactly-whats-being-18423024>

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is in the Tall Building 'zone' however not 'core' or 'pinnacle'. The station is Grade II listed and within a conservation area. It is considered that 12 units / 3-4 storeys is an appropriate indicative capacity.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. However viability is not fixed at the time of the compilation of the plan. It will depend upon the benchmark land value, gross development value and development costs. It is not the role of the authority to establish viability in detail for every site, as developers are instigating the development process and deriving the profit from the proposal. However the position, features of the site and ownership indicate that it would be deliverable. Desired development mix is laid out in Policy BH6. As the site is in a prime central / outer urban location adjacent to a station and numerous local facilities, it is considered that developers are likely to take an interest.

Site allocation: BSESA35 - 303-309 Cricklewood Bdy, NW2 6PG.

Are the criteria in the allocations policy necessary, relevant and deliverable?

Bordered by sites included in the 2017 SHLAA, this site is on the edge of the town centre and into the buffer area. The a surrounding characteristic is 4-5 storeys. There are no nearby heritage assets and the PTAL is 5. With larger sites nearby and on a corner plot, this is an ideal position for a landmark building. Industrial use at the ground floor fits the current use and demand as well as the changing character of the A5 as it heads north towards Staples Corner.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

The approach is consistent with the methods as set out within MHCLG Planning Practice Guidance : 'Housing and economic land availability assessments'. The figure is identified as indicative and is included in the housing trajectory.

Is the description of the site necessary to be included within the policy wording?

As a smaller site and reflection of a granted permission rather than a future intended allocation requiring a level of direction, less detail is included.

Is the allocation justified by the evidence base?

Brent is classed as having 'High' residential growth potential under the Draft London Plan (DLP) and has a target of 23, 250 new homes, over the ten year period to 2028/2029. This is one of the highest borough targets. London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. This site could contribute around 12 of these, plus replacement industrial space, perhaps at a higher value use than the B8 currently present.

Is the extent of each site correctly identified?

Yes, the site is marked on the interactive map as a potential site allocation. 2 x sites are included - LGPRs are 202110066 and 202142311

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

No applications have yet been received, but it is considered that the allocation may generate interest.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within the tall buildings zone. Considering the heights that would be acceptable for neighbour amenity, and the other allocated sites nearby, plus, the requirement for replacement of the Industrial space, the allocation is considered appropriate.

Have all the site constraints, development mix and viability considerations been taken into account?

The Council conducted a standardised viability test on a range of 31 typologies and this is fully documented in the document 'London Borough of Brent: Local Plan Viability study'; ref. Core_Gen_01 in the evidence base. However viability is not fixed at the time of the compilation of the plan. It will depend upon the benchmark land value, gross development value and development costs. It is not the role of the authority to establish viability in detail for every site, as developers are instigating the development process and deriving the profit from the proposal. However the position and features of the site and indicate that it would be deliverable. Desired development mix is laid out in Policy BH6.

Matter 9 – Places (including Site Allocations)

Main Issue: Are the policies and site allocations outlined within the places section of the Plan justified, effective and consistent with national policy?

[Section 5 of the Plan]

General Questions

9.1 In relation to all of the proposed site allocations contained within 'Section 5 – Places' of the Plan: Examination of the Brent Local Plan

SOUTH WEST PLACE	
Site allocation: BSWSA1: ALPERTON INDUSTRIAL SITES	
Are the criteria in the allocations policy necessary, relevant and deliverable?	
	<ul style="list-style-type: none">• Brent Local Development Framework- Site Specific Allocations DPD 2011 recognised Alperton House (A1), Minavil House & Unit 7, and Rosemont Road (A2) as SSA. This was taken forward in the in the Alperton Masterplan SPD¹ as (SSA A1, SSA A2) and other parts of the allocation were recognised for development. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,<ul style="list-style-type: none">○ Supporting housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy D1/H1/SD10○ Maximise re-provision of industrial floorspace to assist in meeting Brent's industrial land needs and contamination remediation in line with London Plan policy E4/E6/E7.○ The provision of commercial and social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy E9/S1 and Brent's Core Strategy for Alperton Growth Area.○ The development to be sympathetic to the adjacent Locally Listed Alperton Station supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).○ In line with London Plan Policy E7/D13, incorporation of noise mitigation in design developments.○ Retaining the wildlife corridor and adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).○ Contribute positively towards waterside development and associated infrastructure due to the Grand Union located at the south of the site in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1.○ To reduce greenhouse gas emissions in accordance with London Plan Policy SI2/SI3/SI4○ Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.

¹ Brent Council, Alperton Masterplan SPD, 2011-2019 (This document was revoked by the Council's Cabinet on 14 October 2019) <BrentCouncil/alperton-masterplan-spd-final.pdf>

- Active frontage as required by London Plan Policy D3/GG1.
- Other requirements relate to infrastructure such as road improvements to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- The criteria are deliverable as this is supported through the Alperton Growth Area, Mayor's Housing Zone designation for Alperton, Tall Building Zone (Core), Brent's IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. It recognises these sites as a 'large site capacity' with a potential to develop at 'Central' density.
- The following sites within the allocation are identified separately in the SHLAA with indicative capacity of 1340.
 - Alperton House and Public House as an 'Allocation' status –210
 - Minavil House as an 'Allocation' status –210
 - Alperton LSIS as a 'potential development' status – 210
 - Alperton bus depot as a 'potential development' – 355
 - Alperton Housing zone/ 2A Bridgewater Road as a 'potential development' – 355
- Initial capacity estimate was based on SHLAA (density/ha) and permission on adjacent sites. With time, the market has responded to this site differently making it suitable for higher delivery density. Compliance to changing national/regional plan policies with viability of industrial re-provision and affordable housing has also affected the capacity.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The site has come forward in several phases through multiple applications. As such, the trajectory reflects the revised capacity in accordance with the new proposed modification below of 1850. The trajectory reflects the various phases of the allocation:
 - Alperton House (ref:18/4199 & 20/0737) , full planning permission - 474
 - Minavil House (ref:16/2629), full planning permission – 251
 - All units at Dowlings Parade, HNS Autos and Delta Hand Car Wash (ref:19/3819), to be determined
 - 2A, Part of Former Westend Saab and Boyriven Textile (ref:19/4541), full planning permission – 124

<ul style="list-style-type: none"> - Alperton bus depot (ref:20/0055/PRE), to be determined (The trajectory has determined an estimate of 324 units based on tall building core density and adjacent permissions) - The remainder of the site : 677 <ul style="list-style-type: none"> • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • All sites indicative capacities and timing of delivery will be updated in accordance with the housing trajectory once assumptions for all sites have been considered and agreed by the Inspectors as part of the examination process.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2013 SHLAA, 2017 SHLAA and associated call for sites. • Mayor's Housing Zone (Alperton) • West London Employment Land Review 2018 • Brent Core Strategy (Alperton Growth Area) • Tall Building Strategy (Tall Building Zone) • Alperton Masterplan SPD 2011-2019 • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal • Brent Local Development Framework- Site Specific Allocations DPD 2011
<p>Is the extent of each site correctly identified?</p>
<p>Yes, the extent of each site is correctly identified. The boundary has been informed by existing allocations and land ownership.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.</p>
<p>Is the allocated site deliverable?</p>
<p>This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has varying PTAL 4-6a across the sites. It is an underutilised/poor quality environment site which can comprehensively deliver mixed use residential development through co-location. Most of the site (listed below) is considered to be built out and contribute to the 5 year housing land supply.</p> <ul style="list-style-type: none"> - Alperton House: 100% - Minavil House:100% - 2A, Part of Former Westend Saab and Boyriven Textile : 100% - Alperton bus depot 100%
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Alperton GA/Housing Zone and Tall Building Zone where London Plan Policy D1/D9 supports such sites to meet borough-wide growth requirements, including overall housing targets. Part 7.4 of the Tall Building Strategy recognises Alperton as 'Tall Building Cluster'.

The site is within the core and edge of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core. In addition the strategy recommends reducing building heights near to the zone's boundary outside the core. This transition is supported by the adjacent intensification corridor on Bridgewater Road where the strategy (part 4.26) supports a general height of 15m (5 storeys). As such, the SSA considers the prevailing lower-context height and recommends stepping down towards the peripheries of the site.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable

Site allocation: BSWSA2: SAINSBURY'S ALPERTON

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is brought forward from the Alperton Masterplan and SSA DPD which recognised this site as an allocation (SSA A3). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supporting housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy D1/H1/SD10
 - The re-provision of large convenience (food shopping) floorspace, which is trading well in order to address the exiting offer. In line with emerging London Plan Policy E9, Retail and Leisure Needs Study (EB_E_06) and Brent's Core Strategy for Alperton Growth Area.
 - The development to be sympathetic to the adjacent site of Archaeological Importance in line with the Tall Building Strategy and supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.

- Urban greening measures as identified in London Plan Policy G5 and Open Space Study (EB_GI_02).
- Contribute positively towards waterside development and associated infrastructure due to the Grand Union located at the north of the site in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1.
- Active frontage as required by London Plan Policy D3/GG1.
- Increasing energy efficiency through the use of smart technologies and utilising low carbon energy sources in line with GG6/SI2/SI3.
- Due to the site's history as a historic industrial site, contamination remediation in line with London Plan policy E7.
- In line with London Plan Policy E7/D13, incorporation of noise mitigation in design developments.
- Transport assessment to assist in Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the Alperton Growth Area, Mayor's designation as a Housing Zone, Brent's IDP, Tall building Zone, IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site is identified in the 2017 SHLAA database as a 'potential development' status with indicative capacity as 260. The capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. It recognises these sites as a 'large site capacity' with a potential to develop at 'Central' density.
- The site is in an area where there are already high density development in the pipeline and some under construction, so it is likely higher density could be achieved. The density was changed in 2017 SHLAA and the Plan compared to the 2013 SHLAA to be consistent with surrounding sites.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020.

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- 2013 SHLAA, 2017 SHLAA
- Mayor's Housing Zone (Alperton)
- Brent Core Strategy (Alperton Growth Area)
- Brent Local Development Framework- Site Specific Allocations DPD 2011
- Tall Building Zone (Tall Building Strategy)
- Alperton Masterplan SPD 2011-2019
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.

Is the allocated site deliverable?

This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has PTAL 4. It is an underutilised site which can comprehensively deliver mixed use residential development. The site is considered to be built out until the end of the Plan period, and therefore does not contribute to the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Alperton GA/Housing Zone and Tall Building Zone where London Plan Policy D1/D9 supports such sites to meet borough-wide growth requirements, including overall housing targets. Part 7.4 of the Tall Building Strategy recognises Alperton as 'Tall Building Cluster'.

The site is within the core and edge of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core. In addition the strategy recommends reducing building heights near to the zone's boundary outside the core. The site is surrounded by LSIS in the south, upcoming Tall buildings in the north and east and terraced houses on the west (Eden Close). As such, the SSA recommends that the height takes its cue from the surrounding heights.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable

Site allocation: BSWSA3 ATLIP ROAD

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is brought forward from the Alperton Masterplan and SSA DPD which recognised this site as an allocation (SSA A4). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supporting housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy D1/H1/SD10
 - The provision of commercial, employment/workspace and social infrastructure (such as the Church) in order to address the exiting offer. In line with emerging London Plan Policy E9/S1/ SD6/SD7 and Brent's Core Strategy for Alperton Growth Area.
 - The development to be sympathetic to the adjacent Locally Listed Alperton Station supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Road and access improvements to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - Active frontage as required by London Plan Policy D3/GG1.
 - Retaining the wildlife corridor and adopting urban greening measures and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - In line with London Plan Policy E7/D13, incorporation of noise mitigation in design developments.
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.
- The criteria are relevant as it takes into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the Alperton Growth Area, Mayor's Housing Zone designation for Alperton, Tall Building Zone, Brent's IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site was part of the 2013 SHLAA and brought forward from the Site Specific Allocations DPD. The Reg 19 draft Plan identifies an indicative capacity of 335 consistent with the net site area at an opportunity area density for PTAL 4 of 355 dph. The site has a planning permission (ref:15:2061), which whilst still extant is likely to be superseded as the

<p>site's owners are looking to deliver a denser scheme over the site allocation, which the Council considers is likely to be appropriate. Taking account of developer discussions associated with draft schemes, it is considered that an indicative capacity of 450 dwellings is now appropriate, which is reflected in the housing trajectory and a modification to the site allocation.</p> <ul style="list-style-type: none"> • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2013 SHLAA • Mayor's Housing Zone (Alperton) • West London Employment Land Review 2018 • Brent Local Development Framework- Site Specific Allocations DPD 2011 • Brent Core Strategy (Alperton Growth Area) • Tall Building Zone (Tall Building Strategy) • Alperton Masterplan SPD 2011-2019 • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>Yes, the extent of each site is correctly identified. The boundary has been informed by 2013 SHLAA.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.</p>
<p>Is the allocated site deliverable?</p>
<p>Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It is located within the Wembley OA/GA, Housing Zone, Tall Building Zone, Town Centre boundary and PTAL 5. It is an underutilised site which can comprehensively deliver mixed use development.</p> <p>The site benefits from pre-application and full planning application. Currently, part of the allocation benefits from a full planning permission (ref:15/2061). The trajectory reflects that 25% of the site is considered to be built out and will contribute to the 5 year housing land supply and the remaining within the Plan period.</p>

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Alperton GA/Housing Zone and Tall Building Zone where London Plan Policy D1/D9 supports such sites to meet borough-wide growth requirements, including overall housing targets. Part 7.4 of the Tall Building Strategy recognises Alperton as 'Tall Building Cluster'.

The site is within the core and edge of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core. In addition the strategy recommends reducing building heights near to the zone's boundary outside the core. As such, the SSA recommends that the height steps down towards the east due to the lower residential houses on Sunleigh Road.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards the town centre viability, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BSWSA4: SUNLEIGH ROAD

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is brought forward from the Alperton Masterplan and SSA DPD 2011 which recognised the site as an allocation (SSA A5). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supporting housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy D1/H1/SD10
 - Maximise re-provision of industrial floorspace to assist in meeting Brent's industrial land needs and contamination remediation in line with London Plan policy E4/E6/E7.
 - Contribute positively towards waterside development and associated infrastructure due to the Grand Union located at the south of the site in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1.
 - Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI1/BGI2 and Open Space Study (EB_GI_02).

<ul style="list-style-type: none"> ○ Road and access improvements to assist in Brent’s Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent’s Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04). ○ Active frontage as required by London Plan Policy D3/GG1. ○ Adopting urban greening measures and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02). ○ In line with London Plan Policy E7/D13, incorporation of noise mitigation in design developments. ○ Ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6. ○ Increasing energy efficiency through the use of smart technologies and utilising low carbon energy sources in line with GG6/SI2/SI3. ● The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations. ● The criteria are deliverable as this is supported through the Alperton Growth Area, Mayor’s designation as a Housing Zone, Tall building Zone, IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> ● The 2017 SHLAA recognises the site as an ‘allocation’ and a ‘large site capacity’ with a potential to develop at ‘Central density’. The SHLAA suggests the capacity estimate to be 210. The Plan recognises a higher capacity of 395 factoring in the planning permissions in the surrounding, the changing market response, and compliance to changing national / regional plan policies with viability of industrial re-provision and affordable housing. ● The indicative capacity has been derived through the methodology outlined in the 2017 SHLAA’s guidance notes and the density matrix. As the site is in an area where there are already high density development in the pipeline, higher density matrix is adopted. ● The site is given a capacity estimate and the term ‘indicative’ sufficiently suggests this. ● Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p>

<ul style="list-style-type: none"> • 2013 SHLAA, 2017 SHLAA and associated call for sites. • Mayor’s Housing Zone (Alperton) • West London Employment Land Review 2018 • Brent Local Development Framework- Site Specific Allocations DPD 2011 • Brent Core Strategy (Alperton Growth Area) • Tall Building Zone (Tall Building Strategy) • Alperton Masterplan SPD 2011-2019 • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>Yes, the extent of each site is correctly identified. The boundary has been informed by 2013/2017 SHLAA, SSA DPD.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.</p>
<p>Is the allocated site deliverable?</p>
<p>Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has a relatively low PTAL 2-3 which is aimed to be improved with regeneration in the area and waterside developments. It is an underutilised site/poor environment site which can comprehensively deliver mixed use residential development with re-provision of industrial use. The total site is considered to be built out within the Plan period, however parts of the sites will contribute to the 5 year housing land supply.</p> <ul style="list-style-type: none"> • Prior approval (ref: 18/0418), completed on site (26 units) • Full planning permission (ref:18/0320) for 9 dwelling houses
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>The site has a varied contextual spatial character due to its location. Although the site falls within Tall Building Zone, the north part of the site is surrounded by terraced houses and south side is bounded by the canal. The approved permissions on parts of the site take into consideration the stepping down of height in line with the Tall Building Strategy. The policy suggests that the building height should be of a mid-rise nature and should respect the prevailing height of the surrounding area.</p>
<p>Have all the site constraints, development mix and viability considerations been taken into account?</p>
<p>The council’s evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA’s allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.</p> <p>In Addition, Brent’s Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.</p>

Site allocation: BSWSA5: ABBEY INDUSTRIAL ESTATE

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is brought forward from the Alperton Masterplan and SSA DPD 2011 which recognised the site as an allocation (SSA A6). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supporting housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy D1/H1/SD10
 - Maximise re-provision of industrial floorspace to assist in meeting Brent’s industrial land needs in line with London Plan policy E4/E6/E7.
 - The provision of commercial and social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy E9/S1 and Brent’s Core Strategy for Alperton Growth Area.
 - Contribute positively towards waterside development and associated infrastructure due to the Grand Union located at the south of the site in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1.
 - Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI1/BGI2 and Open Space Study (EB_GI_02).
 - Road and access improvements to assist in Brent’s Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent’s Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
 - Active frontage as required by London Plan Policy D3/GG1.
 - In line with London Plan Policy E7/D13, incorporation of noise mitigation in design developments.
 - Flood mitigation and ensuring water efficiency and sufficient capacities in line with London Plan Policy GG6.
 - Increasing energy efficiency through the use of smart technologies and utilising low carbon energy sources in line with GG6/SI2/SI3.
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the Alperton Growth Area, Mayor’s designation as a Housing Zone, Tall building Zone, IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The 2017 SHLAA recognises the site as an ‘allocation’ and a ‘large site capacity’ with a potential to develop at ‘Central density’. The SHLAA

<p>suggests the capacity estimate to be 210. The site has been brought forward from the Alperton Masterplan SPD (SSA –A6 Woodside Avenue), The Site Specific Allocations DPD (A6 Woodside Avenue) recognising its capacity as 220. The Plan recognises a (revised ref: MM202) higher capacity of 490 factoring in the market response to this site making it suitable for higher delivery density. Compliance to changing national/ regional plan policies with viability of industrial re-provision and affordable housing has also affected the capacity.</p> <ul style="list-style-type: none"> • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2013 SHLAA, 2017 SHLAA and associated call for sites. • Mayor's Housing Zone (Alperton) • West London Employment Land Review 2018 • Brent Local Development Framework- Site Specific Allocations DPD 2011 • Brent Core Strategy (Alperton Growth Area) • Tall Building Zone (Tall Building Strategy) • Alperton Masterplan SPD 2011-2019 • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>Yes, the extent of each site is correctly identified. The boundary has been informed by SHLAA and SSA DPD.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.</p>
<p>Is the allocated site deliverable?</p>
<p>Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has a relatively low PTAL 2-3 which is aimed to be improved with regeneration in the area and waterside developments. It is an underutilised site/poor environment site which can comprehensively deliver mixed use residential development with re-provision of industrial use. The total site is considered to be built out within the Plan period, however very small part of the site has full planning</p>

application (ref:20/1096) to be determined for 14 dwelling houses that will contribute to the 5 year housing land supply.

The larger part of the site benefits from developer interest through past full planning application (ref:18/4919) and pre-app discussion.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Alperton GA/Housing Zone and Tall Building Zone where London Plan Policy D1/D9 supports such sites to meet borough-wide growth requirements, including overall housing targets.

Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). The appropriate general heights for Alperton set out is 5-26 storeys (15-78m). As identified in Part 9.2 of the Strategy, building heights should step down at the Zone's edges to provide a sympathetic transition that respects the existing character of the remaining adjacent areas. As such, the SSA has suggested that development height is suitable for mid-rise height due to its surrounding suburban character in the north with buildings of greater massing acceptable away from the edges.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable

Site allocation: BSWSA6: BERESFORD AVENUE

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site is brought forward from the Alperton Masterplan and SSA DPD 2011 which recognised the site as an allocation (SSA A7 - Mount Pleasant / Beresford Avenue). The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supporting housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy D1/H1/SD10
 - Maximise re-provision of industrial floorspace to assist in meeting Brent's industrial land needs in line with London Plan policy E4/E6/E7.

- The provision of commercial and social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy E9/S1 and Brent’s Core Strategy for Alperton Growth Area.
- Contribute positively towards waterside development and associated infrastructure due to the Grand Union located at the south of the site in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1.
- Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI1/BGI2 and Open Space Study (EB_GI_02).
- Road and access improvements to assist in Brent’s Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent’s Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- Active frontage as required by London Plan Policy D3/GG1.
- Ensure water efficiency and sufficient capacities in line with London Plan Policy GG6.
- Increasing energy efficiency through the use of smart technologies and utilising low carbon energy sources in line with GG6/SI2/SI3.
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the Alperton Growth Area, Mayor’s designation as a Housing Zone, Tall building Zone, IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The 2017 SHLAA recognises the site as an ‘allocation’ and a ‘large site capacity’ with a potential to develop at ‘Central density. The SHLAA refers to the site as Alperton Site Allocation (Part) and suggests the capacity estimate to be 210. The SSA DPD recognised its capacity as 100. The Plan recognises its indicative capacity as 147 factoring in the market response to this site making it suitable for higher delivery density. Compliance to changing national/ regional plan policies with viability of industrial re-provision and affordable housing.
- The indicative capacity has been derived through the methodology outlined in the 2017 SHLAA’s guidance notes and the density matrix.
- The site is given a capacity estimate and the term ‘indicative’ sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown.

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- 2013 SHLAA, 2017 SHLAA and associated call for sites.
- Mayor’s Housing Zone (Alperton)
- West London Employment Land Review 2018
- Brent Local Development Framework- Site Specific Allocations DPD 2011
- Brent Core Strategy (Alperton Growth Area)
- Tall Building Zone (Tall Building Strategy)
- Alperton Masterplan SPD 2011-2019
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership and SSA DPD.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council’s support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has a relatively low PTAL 2 which is aimed to be improved with regeneration in the area and waterside developments. It is an underutilised site/poor environment site which can comprehensively deliver mixed use residential development with re-provision of industrial use. The total site is considered to be built out within the Plan period, However some parts of the site will contribute towards the 5 year housing land supply (see below).

The site benefits from 3 different full planning applications currently under consideration and 1 approved.

- 100 Beresford Avenue: full planning application to be determined (ref:20/1424) proposing 104 units.
- Afrex House: full planning permission (ref:18/0752) delivering 31 units on site.
- Liberty centre: full planning permission (ref: 17/5261) delivered 10 units with further 2 dwellings completed (ref:18/0985).

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Alperton GA/Housing Zone and Tall Building Zone where London Plan Policy D1/D9

supports such sites to meet borough-wide growth requirements, including overall housing targets.

Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). However, Part 9.2 also suggests that building heights should step down at the Zone's edges to provide a sympathetic transition that respects the existing character of the remaining adjacent areas. As such, the SSA has suggested that development height is suitable for tall building with mid-rise height of 6 storeys due to its surrounding suburban character on Beresford Avenue in the north.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable

Site allocation: BSWA7: NORTHFIELDS

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The Alperton Masterplan recognised the site under additional study area. The criteria approved in the hybrid planning permission (18/0321) are informed by the London and Local Plan Policies. The criteria are relevant and support:
 - Housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy D1/H1/SD10
 - Provision of B1a/B1c,/B8 and employment floorspace to maximise re-provision of industrial floorspace to assist in meeting Brent's industrial needs in line with London Plan policy E4/E6/E7.
 - The provision of commercial/employment and social infrastructure in order to address the exiting offer. In line with emerging London Plan Policy E9/S1 and Brent's Core Strategy for Alperton Growth Area.
 - Contribute positively towards waterside development and associated infrastructure due to the Grand Union located at the south of the site in line with London Plan Policy SI 16/SI 17 and Plan Policy BGI1.
 - Adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI1/BGI2 and Open Space Study (EB_GI_02).
 - Road and access improvements to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's

<p>Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).</p> <ul style="list-style-type: none"> ○ Active frontage as required by London Plan Policy D3/GG1. ○ Provision of energy centre to increase energy efficiency through the use of smart technologies and utilising low carbon energy sources in line with GG6/SI2/SI3. <ul style="list-style-type: none"> • The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations. • The criteria are deliverable as this is supported through the Alperton Growth Area, Mayor's Housing Zone designation for Alperton, Tall Building Zone (Core), Brent's IDP, Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> • Brought forward from the 2013 SHLAA and associated call for sites (Northfields Industrial Estate/Beresford Avenue). SHLAA recognises the site as an 'allocation' and a 'large site capacity' with a potential to develop at 'Central' density. • The SHLAA and the Plan recognised its indicative capacity as 2900. However this capacity was revised to 3,030 subsequent to detailed planning and amended planning permission (ref:19/2732). It has come forward as a comprehensive redevelopment. • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2013 SHLAA, 2017 SHLAA and associated call for sites. • Mayor's Housing Zone (Alperton) • Brent Core Strategy (Alperton Growth Area) • Tall Building Zone (Tall Building Strategy) • Alperton Masterplan SPD 2011-2019 • IIA - Site Allocation Assessments • Outline and full planning permissions. • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>

Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership and consultation with stakeholders.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has a low PTAL 2-3 across the site which is aimed to be improved with regeneration in the area and waterside development. It is an underutilised/poor quality environment site which can comprehensively deliver mixed use residential development. It has come forward as a comprehensive redevelopment and now being delivered on site in phases:

- Part of the site with Full planning permission (ref:18/0321) has started on site delivering 524 units. 50% to be built out and contribute towards the 5 year housing land supply.
- Part of the site with Full planning permission (ref:18/0321) has started on site delivering 400 units .All of it will be built out and contribute towards the 5 year housing land supply.
- Remaining part of the site with outline planning permission (ref: 18/0321)/(ref:19/2732) for 2106 units will be delivered within the plan period.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Alperton GA/Housing Zone and Tall Building Zone (core) where London Plan Policy D1/D9 supports such sites to meet borough-wide growth requirements, including overall housing targets. Part 7.4 of the Tall Building Strategy recognises Alperton as 'Tall Building Cluster'.

Most of the site is within the core and edge of the Tall Building Zone, as such the Tall Building Strategy (part 8.6) supports buildings of over 15 storeys (45+ metres) inside the core. In addition the strategy recommends reducing building heights near to the zone's boundary outside the core. As such, the hybrid planning application has considered this.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable

Site allocation: BSWSA8: WEMBLEY HIGH ROAD

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the regeneration area in the Wembley Masterplan SPD 2009 and recognised as a site allocation in the SSA DPD (W9. Wembley High Road). The Plan has carried forward this site from the WAAP which recognised the site as: W 4 High Road/Chiltern Line Cutting South. The criteria are relevant as it allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,
 - Supports housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD1/SD10
 - The provision of mixed use (retail/commercial/employment) in order to address the exiting offer and the town centre location. In line with emerging London Plan Policy E9/SD6/SD7, Retail & Leisure Needs Study (EB_E_06) and Brent's Core Strategy for Wembley Growth Area.
 - Maximise re-provision of industrial floorspace to assist in meeting Brent's industrial land needs and contamination remediation in line with London Plan policy E4/E6/E7.
 - The development to be sympathetic to the adjacent site of Archaeological Importance in line with the Tall Building Strategy and supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
 - Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
 - Retaining the wildlife corridor and adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - Active frontage as required by London Plan Policy D3/GG1.
 - Transport infrastructure improvements to assist in Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley, Wembley GA, Tall Building Zone, Town Centre location, Brent's IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative

only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The 2017 SHLAA capacity estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix. It recognises this site as an 'allocation' with a potential to develop at 'Central' density.
- The indicative capacity figure is derived through the methodology outlined in SHLAA guidance notes and the Opportunity Area density estimates in the density matrix.
- The SSA DPD 2011 set out a capacity of 600 for this site. WAAP 2015 suggests a capacity of 890 units. 2017 SHLAA identifies an appropriate capacity of 450 dph based on PTAL 5 in an opportunity area, albeit applied to a smaller area, delivering 650 dwellings. Taking account of consents to date and the need to re-provide commercial uses, the SHLAA estimate has been applied to the wider site identified in the Plan.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. Where a site allocation has multiple applications or phases then the trajectory also shows this breakdown

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- 2013 SHLAA, 2017 SHLAA and associated call for sites
- London Plan designated Opportunity Area
- Mayor's Housing Zone (Wembley)
- Brent Core Strategy (Wembley Growth Area)
- Tall Building Zone
- Wembley Masterplan SPD 2009 (Regeneration Area)
- Wembley Area Action Plan 2015
- Brent Local Development Framework- Site Specific Allocations DPD 2011
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership reflected on the policies map.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has an excellent PTAL 5-6a. It is an underutilised site which can comprehensively deliver mixed use residential development. The site is considered to be built out within the Plan period, however some parts of the site contribute to the 5 year housing land supply (as listed below).

- Ujima House (ref: 19/3092) outline planning application to be determined, 54 units. All of it will be built out and contribute towards the 5 year housing land supply.
- Land, garages, alleyway rear of 416-444 High Road (ref: 18/3111), full planning permission, 256 units. All of it will be built out and contribute towards the 5 year housing land supply.
- Significant part of the remainder of the site has been subject to pre-app, indicating the indicative capacity can be delivered.

The site has not come forward comprehensively. However, parts of the site benefit from pre-apps and full planning applications making it considered to be deliverable.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.

Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). However, Part 9.2 also suggests that building heights should step down at the Zone's edges to provide a sympathetic transition that respects the existing character of the remaining adjacent areas. This is reflected in the SSA.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contribute towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BSWSA9: FORMER COPLAND SCHOOL

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site was part of the regeneration area in the Wembley Masterplan SPD 2009. The site was allocated in the WAAP (Site W5 Copland School and Brent House). Part of that site has been carried forward in the Plan and the Brent House has been delivered. The criteria are relevant as it

allows broad design considerations, infrastructure and assessments to be considered at an early stage. Such as,

- Supports housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD1/SD10
- The provision of mixed use and social infrastructure in order to address the exiting offer and the town centre location. In line with emerging London Plan Policy E9/S1/SD6/SD7, Brent's IDP (EB_I_01), Retail & Leisure Needs Study (EB_E_06) and Brent's Core Strategy for Wembley Growth Area.
- The development to be sympathetic to the adjacent site of Archaeological Importance in line with the Tall Building Strategy and supported by Brent's Historic Environment Place-Making Strategy 2019 (EB_HC_01).
- Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
- Retaining the wildlife corridor and adopting urban greening measures through retaining the tree stock and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
- Active frontage as required by London Plan Policy D3/GG1.
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley, Wembley GA, Town Centre location, Brent's IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- 2013 SHLAA estimate takes into account the methodology outlined in the SHLAA guidance notes and the density matrix.
- The site was allocated in the WAAP (Site W5 Copland School and Brent House) with a capacity of 370 units. The Plan indicates an estimate of 250 taking into account that Brent House is complete on site.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020.

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

<ul style="list-style-type: none"> • 2013 SHLAA and associated call for sites • London Plan designated Opportunity Area • Mayor’s Housing Zone (Wembley) • Brent Core Strategy (Wembley Growth Area) • Tall Building Zone • Wembley Masterplan SPD 2009 (Regeneration Area) • Wembley Area Action Plan • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>Yes, the extent of each site is correctly identified. The boundary has been informed by land ownership and WAAP site boundary.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. The detailed requirements for each site are clearly worded and set out in table form under relevant title such as allocated use, timeframe for delivery (0-5, 5-10, 10+ years), planning considerations, design principles, infrastructure requirements</p>
<p>Is the allocated site deliverable?</p>
<p>Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area with PTAL 6a. It is a cleared/vacant site which can deliver mixed use residential development along with community use due to its town centre location. The site is considered to be built out and contribute to the 5 year housing land supply.</p> <p>The allocation benefits from full planning application (ref:15/3167, 19/2891) to be determined by the council, proposing a capacity of 250 units.</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.</p> <p>Part 9.1 of the Strategy identifies Tall Buildings Zone to be appropriate for buildings of 10+ storeys (approx. 30+metres). However, Part 9.2 also suggests that building heights should step down at the Zone’s edges to provide a sympathetic transition that respects the existing character of the remaining adjacent areas. As such, the prevailing surrounding height of 7-10 storeys is considered with a step down towards the south.</p>
<p>Have all the site constraints, development mix and viability considerations been taken into account?</p>
<p>The council’s evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA’s allocations contributes towards housing targets, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.</p>

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Site allocation: BSWS10: ELM ROAD

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The criteria are relevant taking into account stakeholder representation and through Reg 18/19 consultations. In regards to delivering town centre uses on High Road side of the site and viable mixed use residential towards Elm Road. It allows infrastructure and assessments to be considered at an early stage, such as,
 - Supporting housing delivery and wider regeneration, ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy H1/SD1/SD10
 - The provision of mixed use and social infrastructure in order to address the exiting offer and the town centre location. In line with emerging London Plan Policy E9/S1/SD6/SD7, Brent's IDP (EB_I_01), Retail & Leisure Needs Study (EB_E_06) and Brent's Core Strategy for Wembley Growth Area.
 - Re-provision of industrial floorspace to assist in meeting Brent's industrial land needs and contamination remediation in line with London Plan policy E4/E6/E7
 - Re-provision of hotel in line with London Plan Policy E10
 - Retaining the wildlife corridor and adopting urban greening measures through retaining mature trees and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02)
 - Ensuring flood mitigation and water efficiency and sufficient capacities in line with London Plan Policy GG6.
 - Retaining the wildlife corridor and adopting urban greening measures through retaining the tree stock and other biodiversity measures as identified in London Plan Policy G4/G5, Plan Policy BGI2 and Open Space Study (EB_GI_02).
 - In line with London Plan Policy D13, incorporation of noise mitigation in design developments.
 - Transport infrastructure to assist in Brent's Cycling Strategy (EB_T_01), Brent Walking Strategy (EB_T_02), Brent's Long Term Transport Strategy (EB_T_03) and Local draft Implementation Plan (EB_T_04).
- The criteria are deliverable as this is supported through the London Plan Wembley OA designation, Mayor's Housing Zone designation for Wembley, Wembley GA, Town Centre location, Brent's IDP, the Local Plan Viability Assessment 2019 and the objectively assessed needs set out in SHMA 2018. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative

only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- About 40% of the site (town centre frontage backwards) was identified in the SHLAA at 450 dph based on PTAL 6 in an Opportunity Area. This would generate an indicative 1,125 dwellings based on the net site area. Whilst the Council has been engaged with a significant landowner, they do not have control of the majority of land in this area, therefore the indicative capacity has been reduced and can be reviewed in a future Local Plan once greater certainty on delivery of the wider area is provided. Factoring in compliance to national/regional/local plan policies with viability of industrial re-provision, hotel provision and affordable housing the indicative capacity is set at 400 dwellings.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020.

Is the description of the site necessary to be included within the policy wording?

The description of the site provides the narrative of area based spatial analysis that was taken as part of the evidence base informing the site allocation. It is necessary for anybody reading the plan to understand the overarching context.

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- London Plan designated Opportunity Area
- Mayor's Housing Zone (Wembley)
- Brent Core Strategy (Wembley Growth Area)
- Tall Building Strategy (Tall Building Zone)
- Wembley Masterplan SPD 2009 (Regeneration Area)
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal
- Local Plan review and stakeholder consultation (Reg 18/Reg 19)

Is the extent of each site correctly identified?

Yes, the extent of each site is correctly identified. The boundary has been informed by stakeholder consultation and their design assessment.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has PTAL 4-6a. Some parts of the site are underutilised and underdevelopment which through comprehensive development deliver major benefits to the housing targets and the local environment. The site is considered to be built

out within the Plan period, however it does not contribute to the 5 year housing land supply.

Part of the site on 1-7, 9, 11 and 11A Elm Road benefits from a planning permission (ref:18/4063) for 5 storey 226 bed aparthotel.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Each site has a varied contextual spatial character due to its location. Taller element of height is supported by its strategic location within the Wembley OA/GA where London Plan Policy SD1 supports this as a major area likely to accommodate high density tall buildings.

However, in reference to the Tall Building Strategy, the site falls at the edge of Wembley Central (B & C) where appropriate heights are considered to be 6-18 storeys (18-54m). For sites outside of Tall Building Zone, Part 9.3 of the Strategy identifies an appropriate additional midrise development. Part of the site is located in the town centre boundary. As such the SSA reflects the Strategy that identifies general building heights of 5 storeys (approx. 15m).

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocations contributes towards the town centre viability, regenerating priority area, potential uplift of landscape and responds to market signals over the plan period. It will deliver wider sustainability benefits as assessed in the IIA.

In Addition, Brent's Local Plan Viability Assessment 2019 has considered the viability of a range of development types consistent with those identified in the allocation as viable and therefore the site is considered deliverable.

Other site allocations

Site allocation: BSWSA 11 Wembley Cutting North, Mostyn Road

Are the criteria in the allocations policy necessary, relevant and deliverable?

- The site formed part of the larger site in SSA DPD 2011 (W10. Wembley Chiltern Embankments). Subject to master planning the capacity was estimated at 390 units. The WAAP divided this site into two sites; W4: High Road/Chiltern Line Cutting South and W3: Chiltern Line Cutting North. The Plan recognises 0.2 ha of the 'Wembley cutting north' on the edge to Mostyn Road. The criteria are relevant based on,
 - Supporting wider regeneration and ensuring that development proposals integrate into the surrounding areas in line with emerging London Plan Policy GG4/H2/SD1/SD10
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the London Plan Mayor's Housing Zone designation for Wembley. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- This site is within the 'Other Site Allocations' table, it does not contain detailed requirements which the full site allocation policies include. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery.
- The site formed part of the larger site in SSA DPD 2011 (W10. Wembley Chiltern Embankments). Subject to master planning the capacity was estimated at 390 units. The WAAP divided this site into two sites; W 4: High Road/Chiltern Line Cutting South and W 3: Chiltern Line Cutting north and identified its development capacity to be 15 units.
- The site is recognised in the 2017 SHLAA as Wembley Cutting, as an 'allocation'. Although the whole site is recognised at 'central' density development, it was noted that the allocation comprises railway sidings and SINC. As such, 'modest development on edge only' was recommended. The Plan recognises 0.1 ha of the 'Wembley cutting north' on the edge to Mostyn Road that is deliverable for 15 units based on the urban typology of 145 dph, which it is considered to be the most appropriate in this location.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020

Is the description of the site necessary to be included within the policy wording?

NA

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation:

- 2013 SHLAA and 2017 SHLAA
- Mayor's Housing Zone (Wembley)
- Brent Core Strategy (Wembley Growth Area)
- Wembley Area Action Plan
- Brent Local Development Framework- Site Specific Allocations DPD 2011
- Local Plan review and stakeholder consultation (Reg 18/Reg 19)
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

The boundary has been informed by desktop study on potential deliverable site.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable designated location with high density development coming forward in surrounding area. It has a good PTAL 3-5. The site is considered to be built out within the Plan period, however it does not contribute to the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

The site is not within any designated location. As such, any proposal coming forward will respond to the surrounding suburban character of Mostyn Avenue.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocation contributes towards small sites target and potential uplift of area. It will deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSWA 12 Keelers Service Centre

Are the criteria in the allocations policy necessary, relevant and deliverable?

- This site is within the 'Other Site Allocations' table, it does not contain detailed requirements which the full site allocation policies include. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery.
- The necessary criteria ensures residential with commercial floorspace on the ground floor achieving optimum and most sustainable form of development on this site in line with National/Regional/Local policies.
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within Sudbury Town Centre and supported by London Plan Policy GG4/H2SD1/SD10. In addition, the council will work closely with developers to overcome any constraints.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- Indicative capacity is 22 in line with the approved planning application (18/3069). The capacity takes into account the site's location, surrounding development and the need to re-provide B Use Class.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020.

Is the description of the site necessary to be included within the policy wording?

NA

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation making the site justified for its allocation:

<ul style="list-style-type: none"> • Site's planning history: (ref:16/0449/PRE) (ref:18/369) • Local Plan review and stakeholder consultation (Reg 18/Reg 19) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
The boundary has been informed by land ownership and planning application.
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.
Is the allocated site deliverable?
The site is considered deliverable as it is in a suitable town centre location. The site has also passed the IIA and sustainability appraisal. In addition, the site benefits from pre-app and full planning application.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The site falls within Sudbury Town Centre. As such, town centre heights will be acceptable in line with the Tall Building Strategy.
Have all the site constraints, development mix and viability considerations been taken into account?
The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocation contributes towards small sites target and potential uplift of area. It will deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSWSA 13 Wembley Police & Fire Stations Harrow Road and Wembley Community Hospital/ Chaplin Road Health Centre

Are the criteria in the allocations policy necessary, relevant and deliverable?

- This site is within the 'Other Site Allocations' table, it does not contain detailed requirements which the full site allocation policies include. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery.
- The necessary criteria ensures re-provision of police, fire station, health facilities/other community uses in line with NPPF (Para 92) and draft London Plan Policy S1/ S2 which encourages better use and co-location of different services and facilitate the release of surplus buildings and land for other uses. Residential development is recommended on remaining surplus land to achieve optimum use of land and most sustainable form of development on this site.
- Part of the site (the Hospital) is a 2013 SHLAA site. The site's boundary was expanded to include the Wembley Police & Fire stations and is recognised in the 2017 SHLAA as a 'low probability site' PTAL 4 urban site at 225dph. Despite the SHLAA assessment it was allocated on the basis of knowledge of One Public Estate ambitions, although the extent

<p>to which all parts of the site will be available was unclear. More recently, a minimum of a hectare has been identified as likely to be available in the short term. The Council has considered this and is seeking a more comprehensive approach to a wider part of the site to maximise its potential.</p> <ul style="list-style-type: none"> • The criteria are deliverable as this is supported through the site's location within the intensification corridor with PTAL 5.
<p>Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?</p>
<ul style="list-style-type: none"> • Indicative capacity is identified as unknown and will be determined by design exercise/ comprehensive development approach.
<p>Is the description of the site necessary to be included within the policy wording?</p>
<p>NA</p>
<p>Is the allocation justified by the evidence base?</p>
<p>The following evidence base documents have informed the site allocation:</p> <ul style="list-style-type: none"> • 2017 SHLAA • Local Plan review and stakeholder consultation (Reg 18/Reg 19) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
<p>Is the extent of each site correctly identified?</p>
<p>The boundary has been informed by land ownership.</p>
<p>Are the detailed requirements for each site clear and justified?</p>
<p>Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.</p>
<p>Is the allocated site deliverable?</p>
<p>The site's benefits from pre-application which shows the allocation is deliverable. Part of the site on Harrow road is in the intensification corridor. The site has also passed the IIA and sustainability appraisal.</p>
<p>Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?</p>
<p>The site is within the Intensification corridor and therefore relevant heights suggested by Tall Building Strategy will apply.</p>
<p>Have all the site constraints, development mix and viability considerations been taken into account?</p>
<p>The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocation contributes towards housing target and potential uplift of area. It will deliver wider sustainability benefits as assessed in the IIA.</p>

Site allocation: BSWA 14 Sudbury Town Station car park

Are the criteria in the allocations policy necessary, relevant and deliverable?

- This site is within the 'Other Site Allocations' table, it does not contain detailed requirements which the full site allocation policies include. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery.
- The criteria are deliverable as this is supported through the site's excellent PTAL and London Plan Policy H2.
- The criteria are necessary as it will ensure the development protects and enhance the setting of the Grade II listed Sudbury Station in line with NPPF (para 193/194) and London Plan policies HC1.
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The site has been subject to a full planning application (ref:19/1241), for 61 dwellings refused by Planning Committee. It is part of TfLs/Mayor's affordable housing delivery sites package. The Council refused it on the basis of the affordable dwellings not meeting Brent's needs (all discount market), rather than the principle of development. It is not clear if there will be an appeal, or the affordable/size mix will be amended.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site is recognised in the 2017 SHLAA as 'potential development' status with indicative capacity of 30 units. This reflected the site area developed to 'suburban' PTAL 4 density of 115 dph.
- The full planning application (ref:19/1241) proposed a higher capacity 61 units. This points to a potential larger capacity being achievable on site. However, it should be noted that the application was 100% one-bed affordable dwellings, and this mix was not considered policy compliant by planning committee.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020

Is the description of the site necessary to be included within the policy wording?

NA

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation making the site justified for its allocation:

- 2017 SHLAA
- Local Plan review and stakeholder consultation (Reg 18/Reg 19)
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

The boundary has been informed by land ownership.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable location with high PTAL. The site is considered to be built out within the Plan period, however it does not contribute to the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Any proposal coming forward will protect and enhance the Grade II heritage asset.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocation contributes towards small sites target and potential uplift of area. It will deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSWSA 15 Employment Land on Heather Park Drive

Are the criteria in the allocations policy necessary, relevant and deliverable?

- This site is within the 'Other Site Allocations' table, it does not contain detailed requirements which the full site allocation policies include. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery.
- The necessary criteria ensures re-provision mixed use residential development that will achieve optimum use of land and most sustainable form of development on this site. Maximum replacement of employment floorspace is required in line with draft London Plan Policy E4/ E8 which supports development of business growth and local employment land reviews.
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The site falls within the Alperton Growth Area. Due to the high density development at the adjacent Northfields site, it increases potential at this site allocation.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site is recognised from the UK Map – Land use data in the 2017 SHLAA as 'potential development' status with potential to develop at 'suburban' density. The Plan recognises an indicative capacity of 28 units.

<ul style="list-style-type: none"> • However indicative capacity has been corrected to 36 in line with the approved planning application (18/0284). The capacity takes into account the site's location, surrounding development and the need to re-provide employment use to replace the existing business and office space. • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020
Is the description of the site necessary to be included within the policy wording?
NA
Is the allocation justified by the evidence base?
<p>The following evidence base documents have informed the site allocation making the site justified for its allocation:</p> <ul style="list-style-type: none"> • 2017 SHLAA • Brent Core Strategy (Alperton Growth Area) • Local Plan review and stakeholder consultation (Reg 18/Reg 19) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
The boundary has been informed by land ownership and the approved planning permission.
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.
Is the allocated site deliverable?
<ul style="list-style-type: none"> • The site's benefits from a full planning application which shows the allocation is deliverable. • It is also part of the Alperton Growth Area where major development is coming forward. • The site has also passed the IIA and sustainability appraisal. • The site is considered to be built out and contribute to the 5 year housing land supply.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
Alperton (Part 8.26) of the Strategy suggests that due to the lower PTAL ratings and existing low rise residential development character, mid-rise is considered the most appropriate i.e. 6-8 storey buildings.
Have all the site constraints, development mix and viability considerations been taken into account?
The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocation

contributes towards housing target and potential uplift of area. It will deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSWSA16 Carphone Warehouse 416 Ealing Road

Are the criteria in the allocations policy necessary, relevant and deliverable?

- This site is within the 'Other Site Allocations' table, it does not contain detailed requirements which the full site allocation policies include. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery.
- The necessary criteria ensures mixed use residential development with re-provision of some retail and community space to serve the local area.
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.
- The criteria are deliverable as this is supported through the site's location within the intensification corridor and given the high PTAL 5.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- The site is recognised from the UK Map – Land use data in the 2017 SHLAA as 'potential development' status with potential to develop at 'central' density. The Plan recognised an indicative capacity of 80 units.
- However indicative capacity has been corrected to 120, assessed through engagement with the stakeholders and design exercise. The revised capacity takes into account the surrounding development and the need to re-provide retail to replace the existing retail warehouse.
- The site is given a capacity estimate and the term 'indicative' sufficiently suggests this.
- Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020

Is the description of the site necessary to be included within the policy wording?

NA

Is the allocation justified by the evidence base?

The following evidence base documents have informed the site allocation making the site justified for its allocation:

- 2017 SHLAA
- Local Plan review and stakeholder consultation (Reg 18/Reg 19)
- IIA - Site Allocation Assessments
- Tested positive through the Sustainability Appraisal

Is the extent of each site correctly identified?

The boundary has been informed by land ownership.

Are the detailed requirements for each site clear and justified?

Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements

and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.

Is the allocated site deliverable?

Yes. This site is considered deliverable as it is in a suitable location with good PTAL 5.

The site's benefits from a full planning application (ref:20/1683) to be determined which shows the allocation is deliverable. The site is considered to be built out and contribute to the 5 year housing land supply.

Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?

Alperton (Part 8.26) of the Strategy suggests that due to the existing low rise residential development character, mid-rise is considered the most appropriate i.e. 6-8 storey buildings. The planning application has been drawn in line with Local Plan Policies and Tall Building Strategy.

Have all the site constraints, development mix and viability considerations been taken into account?

The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocation contributes towards small sites target and potential uplift of area. It will deliver wider sustainability benefits as assessed in the IIA.

Site allocation: BSWSA 17 Former Wembley Youth Centre/ Dennis Jackson Centre

Are the criteria in the allocations policy necessary, relevant and deliverable?

- This site is within the 'Other Site Allocations' table, it does not contain detailed requirements which the full site allocation policies include. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery.
- The necessary criteria ensures residential development with re-provision of community space to serve the local area and replace existing offer. The site is an underdeveloped/ underutilised site. This redevelopment will achieve optimum use of land and most sustainable form of development on this site.
- The criteria are relevant taking into account stakeholder representation through Reg 18/Reg 19 consultations.

Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?

- Part of the site is carried forward from the 2013 SHLAA sites. The 2017 SHLAA recognises it as 'potential development' status with potential to develop at 'central' density. The Plan recognises an indicative capacity of 150 units.
- However indicative capacity has been corrected to 170. The revised capacity takes into account engagement with the stakeholders, design exercise and the need to re-provide community space to replace the former youth centre.

<ul style="list-style-type: none"> • The site is given a capacity estimate and the term 'indicative' sufficiently suggests this. • Unit delivery of capacity is clear through the addition of all years in the Housing Trajectory 2020. The local plan shows the indicative capacity whereas the trajectory has recorded 169 based on live application.
Is the description of the site necessary to be included within the policy wording?
NA
Is the allocation justified by the evidence base?
<p>The following evidence base documents have informed the site allocation making the site justified for its allocation:</p> <ul style="list-style-type: none"> • 2013/2017 SHLAA • Local Plan review and stakeholder consultation (Reg 18/Reg 19) • IIA - Site Allocation Assessments • Tested positive through the Sustainability Appraisal
Is the extent of each site correctly identified?
The boundary has been informed by 2017 SHLAA and stakeholder consultation.
Are the detailed requirements for each site clear and justified?
Yes, the requirements have been identified keeping in line with the regulatory process and consultation with stakeholders. Given the size of the site, the table does not contain detailed requirements. However, the purpose of the allocation shows the potential of the site and the council's support for its delivery. The requirements set out in table provide the necessary requirements and are clearly worded under relevant titles such as allocated use, indicative homes and other essential comments that will make the proposal deliverable.
Is the allocated site deliverable?
The site's benefits from a full planning application (ref:18/4273) to be determined which shows the allocation is deliverable. The site is considered to be built out within the Plan period, however it does not contribute to the 5 year housing land supply.
Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
The site not within any spatial designation. As such, proposal will be in line with prevailing surrounding heights.
Have all the site constraints, development mix and viability considerations been taken into account?
The council's evidence, the Local Plan review and National/Regional/Local policies have informed the allocation, considering site constraints alongside other relevant information. It has been concluded that the SSA's allocation contributes towards small sites target and potential uplift of area. It will deliver wider sustainability benefits as assessed in the IIA.