



# SHAPING BRENT'S FUTURE TOGETHER

Local Plan Issues and Options

Regulation 18 Consultation | February 2018





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# FOREWORD

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Over the last two decades, the London Borough of Brent has changed tremendously. Significant areas have been regenerated and it is a place that is successful in attracting new residents, jobs, investment and visitors. Brent's population increased by 18% between 2001 and 2011 and similar growth is predicted in the future.

The draft London Plan issued by the Mayor in December 2017 expects Brent to play its part in supporting London's continuing growth to 2041 and beyond. This provides some significant opportunities in terms of inward investment, but also undoubtedly challenges for the Brent in the years ahead. The Local Plan is the document that will set out a long term vision for the borough that seeks to improve the borough's places that could be better, whilst retaining those bits that are special.

The Local Plan will set out London Borough of Brent's policies towards housing, town centres, open space, employment, community facilities, the built and natural environment (for example, listed buildings, historic parks and conservation areas) and transport – all of which contribute to making Brent a vibrant place to live and work.

We're working hard to improve living standards, make Brent safer, cleaner and greener, support residents to be healthier and happier, and provide more opportunities to learn and work in the borough. This plan aims to help make this happen, by giving clear guidance; such as what can be built, where, how, for what use, where restrictions apply and why.

We're committed to providing a high quality, responsive Planning Service, and realise how important it is to involve the community in helping us create a better Brent. That's why this powerful plan is the result of on-going community involvement.

**Following public engagement in 2017, this Issues and Options consultation is the first document to be consulted on as part of the new Local Plan. We encourage you to take this opportunity to participate in the process of shaping the future growth of the borough and the policies within the Plan. Further opportunities for public engagement will follow before the Local Plan is finally adopted by 2020.**

## **Councillor Shama Tatler**

Cabinet Member for Regeneration, Growth, Employment and Skills

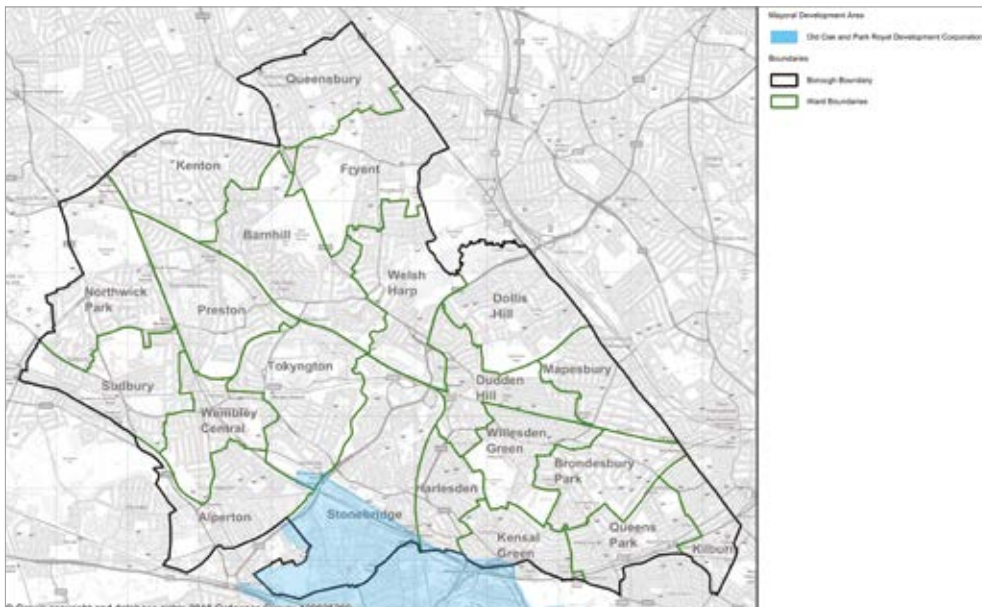
# 1. INTRODUCTION



# Background

1.1 The London Borough of Brent (Brent Council) has started work on a new Local Plan review. The National Planning Policy Framework (NPPF) identifies that Local Plans should be drawn up over an appropriate time scale, preferably a 15 year time horizon and take account of longer term requirements.<sup>1</sup> The Local Plan review is proposing to deal with a period consistent with the end date of the London Plan which is to 2041. This will provide a locally specific spatial policy framework for planning and development for the areas of the borough where the council is the local planning authority as shown in Figure 1.

**Figure 1:** The Borough Boundary and areas in which Brent and the Old Oak and Park Royal Development Corporation is the Local Planning Authority



1.2 Parts of the borough fall within the local planning authority area of the Old Oak and Park Royal Development Corporation (OPDC). (See Figure 1) OPDC's **Local Plan** deals with parts of the borough such as Willesden Junction station area and Park Royal. It is at a more advanced stage than the council's Local Plan and will be submitted for examination in 2018.

1.3 **This consultation provides an opportunity to help shape the future of the area. The Local Plan review will:**

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

## Why are we reviewing the Local Plan?

1.4 **Brent's existing Local Plan comprises a number of documents that have been produced by the council:**

- **Core Strategy adopted 2010**
- **Site Specific Allocations Document adopted 2011**
- **Wembley Area Action Plan adopted 2015 and**
- **Development Management Policies Plan adopted in 2016.**

1.5 The Plan also includes the **West London Waste Plan** adopted in July 2015 and the **Sudbury Town Neighbourhood Plan** adopted in September 2015. The council is not currently proposing to review the Waste Plan as it is relatively up to date and being strategic is best served through being prepared jointly with other London boroughs. Neighbourhood plans are not for the council to review; this is the responsibility of neighbourhood forums.

1 NPPF Paragraph 157

The existing Local Plan documents were consistent with national planning policy and guidance at the time of adoption. Since then, national planning policy and practice guidance have radically altered.

- 1.6 More importantly, the Core Strategy which set out the vision, strategic objectives and high level policies for Brent was consistent with the 2008 London Plan. Since then London's population has continued to grow tremendously, the borough also has changed. The **London Plan** adopted in 2011, and consolidated with alterations in 2016, significantly increased the borough's housing target from 1065 to 1525 dwellings per annum. The latest **Draft London Plan December 2017** again proposes substantial additions; a target which is equivalent to 2915 dwellings per annum from



2019/20 until 2028/29. Whilst being ambitious about housing growth, the council will challenge this target as it does not consider it realistic for a variety of reasons. Nevertheless, because of the pressure to accommodate additional homes in London, the council does anticipate an increase above the existing 1525 dwellings target.

- 1.7 The borough, through the successful delivery of its growth areas in particular, has been able to accommodate in the short term the London Plan's more recent increases in dwelling numbers. It cannot continue to do so for the longer term, particularly if its target does increase, without a radical review of its Local Plan. It is anticipated that the population will grow by 61,560 to 390,025 in the period to 2041<sup>2</sup>. To accommodate this will require not only new homes, but approximately 30,300 new full time equivalent jobs to meet residents' needs, plus the associated improvements to social and physical infrastructure.
- 1.8 The Local Plan review will consider other development needs and, where necessary, review and update current planning policies. The council is aiming to adopt the new Local Plan by 2020. This consultation is the first statutory stage (Regulation 18) of the Local Plan review.

## Which existing policies will be superseded by this Local Plan review?

- 1.9 The extent to which the existing policies will be replaced by the Local Plan review is part of this consultation process. Whilst a full Local Plan review provides a holistic approach, it will be very resource intensive and potentially inefficient. Local Plans can be reviewed in whole or in part to respond flexibly to changing circumstances<sup>3</sup>. There might well be some parts of the Plan or policies, such as those adopted more recently that are considered essentially fit for purpose and should either remain in whole, or part.
- 1.10 The weight that can be attached to the existing Local Plan compared to policies that emerge as part of the review will be dependent on a number of factors, including: the existing and proposed policy's consistency with national and London Plan policy; the level of support or objection to proposed policies and the stage that it is at within the adoption process.

<sup>2</sup> Local authority population projections - Trend projections, long-term migration scenario GLA 2015 Round Demographic Projections

<sup>3</sup> NPPF Paragraph 153

## What is the purpose of this consultation?

- 1.11 We have already undertaken some engagement with local communities, residents' groups, Council services, partner organisations, developers, housing associations, landowners, younger, older and disabled people and community forums during 2017 (see consultation feedback). This has highlighted some of the challenges and opportunities that the borough faces, sought feedback on these and potential options to address them. This consultation seeks to continue this engagement but on a wider scale.
- 1.12 We are seeking comments and information that will help us to develop a draft strategy and policies to be included in the Local Plan review. Although we have done much engagement, we will still need to continue to collect evidence to support new draft policies. This consultation will also assist in identifying what other evidence we will need. At this stage, the council does not have definitive views on the overall scope of the Local Plan review, i.e. which sites and locations should be allocated for new development or how existing policies should be updated.

## National Planning Policies

- 1.13 Brent is a unique, welcoming place that contains and celebrates the fact that it has one of the most ethnically diverse populations in the world. 63.7% are from Black and Minority Ethnic Groups; the second highest proportion in England. It has an internationally renowned iconic National Stadium at Wembley. It also has many areas that are no more than locally known, that provide high quality neighbourhoods for its 328,4654 population. Brent also exhibits many of the challenges faced by other communities, particularly in London, of extremes between the wealthy and those in poverty. According to the Indices of Multiple Deprivation, Brent in 2015 was ranked as the 39th most deprived area nationally, an improvement from 24th in 2010. Such deprivation has impacts on life chances. For example the gap between life-expectancy for men within the most affluent and most deprived areas is 8.8 years<sup>5</sup>. The council has sought and will continue to work to minimise these inequalities through all its actions including its spatial planning policies and celebrate all that is good about the borough.

- 1.14 **The council wants the Local Plan review to reflect the aspirations and choices of its local community. However, the Plan must comply with a number of specific requirements set out in national planning policy and legislation. It has to:**

- reflect national planning policies set out in the NPPF and associated National Planning Practice Guidance;
- be in general conformity with the London Plan
- contribute to the achievement of sustainable development and be supported by a Sustainability Appraisal and Habitat Regulations Assessment;
- aim to meet objectively assessed need and infrastructure requirements;
- have regard to the other strategies of the council and its partners;
- demonstrate joint working on cross-boundary issues;
- take into account evidence of environmental constraints on development and the need to conserve the built and natural heritage; and
- be deliverable within the Plan period taking account of identified constraints, infrastructure requirements and viability considerations.



4 Local authority population projections - Trend projections, long-term migration scenario GLA 2015 Round Demographic Projections

5 The Brent Health and Well Being Strategy 2015-2017 LB Brent and Brent NHS.

# Strategic Planning and the Duty to Co-operate

1.15 London is unique in England that it still has a regional plan in place to deal with strategic planning issues: the London Plan. This assists in dealing with and providing clear policy on a holistic basis on many cross-boundary issues. The current London Plan is also going through a period of review. The new Plan will reflect Mayor Sadiq Khan's vision of enhancing its status as an international world city. In particular it has a focus on addressing the chronic shortage of housing to meet the needs of its population. The council can only take forward a plan which the Greater London Authority (GLA) is able to confirm is in general conformity with the provisions of the London Plan<sup>6</sup>. Legislation introduced in 2017 also requires Brent to state whether we are satisfied that the London Plan covers our strategic priorities and policies<sup>7</sup>.

1.16 The Local Plan review must also be prepared in accordance with the Duty to Cooperate. This sets a legal duty for the council and other public bodies. They must engage constructively, actively and on an ongoing basis on planning issues which affect more than one local planning authority. Notwithstanding the London Plan which deals with many strategic and cross boundary issues, the Duty to Cooperate still applies.

1.17 **Brent is part of the West London Alliance (WLA) which also includes Barnet, Ealing, Hammersmith and Fulham, Harrow, Hillingdon and Hounslow. The WLA is committed to an enduring programme of collaboration and innovation to improve outcomes for West London. It has produced a West London Vision for Growth Action Plan that focuses on seeking to:**

- **Increase growth, employment and skills** so that all residents and businesses share the benefits of economic growth
- Improve **health and wellbeing** to create an integrated and preventative health and care system for individuals, families and communities

6 Section 8 of the Neighbourhood Planning Act which inserts a new Section 19 into the Planning and Compulsory Planning Act 2004

7 Section 8 of the Neighbourhood Planning Act which inserts a new Section 19 into the Planning and Compulsory Planning Act 2004

- Deliver increased **housing** supply and better access to affordable accommodation for all; and
- Deliver **new ways of working** to be the most innovative, effective and efficient sub regional partnership in London.

1.18 The government more recently consulted on a potential requirement for local planning authorities in association with the Duty to Cooperate to produce Statements of Common Ground at each stage of Local Plan process. These would set out what authorities do and don't agree on in relation to strategic cross borough issues. This process has still to be finalised by the government. Once the process is finalised in the NPPF, the council will have to adhere to it.

1.19 Brent will need to work with the Greater London Authority, neighbouring London boroughs (Barnet, Camden, Ealing, Hammersmith and Fulham, Harrow, Kensington and Chelsea and City of Westminster), other WLA London Boroughs, statutory advisory bodies (the Environment Agency, Natural England and Historic England) and other infrastructure providers to ensure that the Local Plan address cross-boundary issues and reflects wider strategic priorities, including considering any needs that cannot be met in adjoining areas. The council will also consult with residents and businesses, including working with neighbourhood forums.







Education.org

No Smoking at any time



## Challenges facing Brent

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**1.20 The most important challenge facing the Local Plan review is to deliver regeneration and growth to meet local and London needs. The aim is reducing inequality and enhancing Brent's residents' and businesses' prosperity whilst, wherever possible, enhancing the area's character, environment and heritage. More specifically, the Local Plan review will need to:**

- Deliver sufficient new housing to address needs;
- Provide a range of housing that meets needs, for example related to size, tenure (including affordable housing) and specialist accommodation;
- Provide space to enable local businesses to grow and to support and diversify the local economy;
- Ensure that new or improved infrastructure is delivered to support the population increases and planned new development, including transport improvements, utilities and measures to reduce potential adverse environmental impacts;
- Plan for improved local and cultural facilities to meet the needs of the growing population;
- Provide for new and improved open space and green infrastructure;
- Preserve statutorily recognised character areas and outstanding heritage and historic assets; and
- Protect and enhance the area's biodiversity and habitats, including designated areas of national importance and positively plan for addressing the implications of climate change.

## What Local Plan review work is being undertaken?

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**1.21 The council is at an early stage in the Local Plan review. As well as consulting, it is undertaking a number of studies to provide evidence for developing the Plan strategy and policies. Further studies and evidence work will be undertaken at later stages of the Plan process. Key evidence to support the Local Plan review will include:**

- Strategic Housing Land Availability Assessment (SHLAA)
- Brent and West London Employment Land Review
- Brent and West London Strategic Housing Market Assessments (SHMAs)
- West London Gypsy and Traveller Needs Assessment (GTANA)
- Retail and Leisure Needs Study/Town Centre Healthcheck
- West London Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2
- Transport Assessment
- Open Space, Sports and Recreation study
- Outdoor and Indoor Playing Pitches / Built Leisure Facilities Needs Assessment
- Heritage, Characterisation and Tall Buildings Studies
- Infrastructure Delivery Plan
- Whole Plan Viability Analysis.

## Integrated Impact Assessment (Incorporating Sustainability Appraisal, Habitats Assessment, Health Impact and Equalities Assessment)

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1.22 Sustainability Appraisal is a key element in developing the Local Plan review strategy and policies. The council is legally required to carry out an appraisal of the sustainability of all proposals. This will help assess how the Plan review will contribute to the achievement of sustainable development, by contributing to relevant economic, social and environmental objectives. The council is also required to screen for a Habitat Regulations Assessment due to the proximity of internationally recognised environmental designations. As part of its commitment to improving the outcomes of its policies for its residents and visitors, the council is also undertaking Health and Equalities Impact Assessments on the Local Plan. All these Assessments have been incorporated into a single document called an Integrated Impact Assessment. This will be consistent with the statutory regulations related to Strategic Environmental Assessment and Habitat Regulations Assessments and duties related to equalities.

1.23 The council has prepared a Draft Local Plan Integrated Impact Assessment (IIA) Scoping Report and framework for the Local Plan review. This has been published for consultation alongside this document. Some questions about the contents of the Scoping Report are set out towards the end of Section 2 of this issues and options document.

1.24 Further work on the Integrated Impact Assessment will be carried out at each stage of Local Plan review process.



## How will the Local Plan Review affect and support Neighbourhood Plans?

- 1.25 A small number of neighbourhood forums within the Brent Local Plan area have 'made' (Sudbury Town) or are preparing neighbourhood plans (Harlesden, Church End and Kilburn) in accordance with the adopted Local Plan. Neighbourhood plans must be in general conformity with the strategic policies of the adopted local plan. Once 'made' neighbourhood plan policies form part of the development plan used when determining planning applications.
- 1.26 As the Local Plan review moves forward, the current neighbourhood plans may each need to be reviewed to bring them in line with the strategic requirements of the emerging Plan review. As part of the Local Plan review process, the council will have discussions with each neighbourhood forum to agree if changes are considered likely to be necessary and how the Local Plan could support neighbourhood plans.

## How do I respond to this consultation document?

- 1.27 The council will be undertaking the Local Plan consultation in accordance with its Statement of Community Involvement adopted in July 2017. The Local Plan review consultation will run for a six week period starting on **Thursday 8 February 2018**. The deadline for responses is **5pm on Thursday 22 March 2018**.

We would encourage you to provide your comments on the council's consultation website by completing the consultation questionnaire and interactive map online at [www.brent.gov.uk/shapebrent](http://www.brent.gov.uk/shapebrent). This is the quickest way of replying. Alternatively you can email us or send us your comments by post by using the addresses below.

**Email:** [planningstrategy@brent.gov.uk](mailto:planningstrategy@brent.gov.uk)  
**Post:** Paul Lewin, Team Leader Planning Policy,  
Brent Council, Engineers' Way, Wembley, HA9 0FJ

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If you are not completing the consultation questionnaire, please make it very clear which part(s) of the document you are commenting on, ideally referencing by paragraph and question number.

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- 1.28 Please note that responding means that we will automatically notify you of future Local Plan consultations unless you request otherwise.





## What are the next steps?

- 1.29 All representations received to this Issues and Options consultation will be considered by the council, grouped, summarised and published for information. Taking account of the consultation responses and further evidence work, the council will prepare a Brent Local Plan review Preferred Approach document for public consultation. This will identify the council's preferred development strategy together with draft policies. Once the council has reviewed the representations made on the Preferred Options it will publish (Regulation 19) a Proposed Submission Brent Local Plan. This is the Plan which the council ideally wants to adopt.
- 1.30 These will also be consulted upon for at least 6 weeks and comments at that stage must only relate to the Plan's 'soundness'. The timing of this stage will be dependent on the extent to which there is clarity and certainty on the emerging London Plan policies, in particular Brent's housing target.
- 1.31 At that stage, the council will consider representations and then decide whether it should make any further amendments to the Plan. All representations and any proposed further amendments to the Plan will be submitted to the Secretary of State for examination by an independent planning inspector. The inspector will determine if the submitted Plan meets the required legal and procedural requirements, and when judged against national planning policy requirements the strategy and policies are 'sound'. Subject to the Plan being found sound, the Council will then adopt it.
- 1.32 The key stages in the preparation of the new Brent Local Plan review are shown in Figure 2 on the right.
- 1.33 If you have any further queries regarding any of the issues raised in this document, please contact the Planning Policy Team at:  
**planningstrategy@brent.gov.uk**
- 1.34 All documents will be held at the council and representations will be published online. All responses will be publicly available and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by the council in line with the Data Protection Act 1998.

Figure 2: Local Plan Review Timetable



### Spring 2018

- Issues and Options Consultation (Regulation 18)
- Consultation on the issues and some of the options potentially available to be addressed in the Brent Local Plan review
- Integrated Impact Assessment Stage A Scoping

### Late 2018

- Preferred Approach Consultation (Regulation 18)
- Consultation on proposed development sites and draft policies
- Integrated Impact Assessment Stage B reasonable alternatives & assessing effects

### 2019

- Proposed Submission Consultation (Regulation 19)
- Formal representations are invited on the draft Local Plan review to be submitted for examination
- Integrated Impact Assessment Stages C & D

### 2019

- Submission to Secretary of State (Regulation 22)

- Submission of the Plan and representations to the Secretary of State
- Integrated Impact Assessment Stages C & D

### 2019

- Examination hearings (Regulations 22-24)
- Examination of the Local Plan review by an independent inspector
- Integrated Impact Assessment Stages C & D

### 2020

- Publication of Inspector's Report and recommendations (Regulation 25)
- Including any recommended amendments to make the Local Plan 'sound'

### By end of 2020

- Adoption of Local Plan review (Regulation 26)
- The point at which the Local Plan formally becomes part of the statutory development plan and takes full effect in the determination of planning applications
- Integrated Impact Assessment Stage E Final Report/Statement and Monitoring

## 2. ISSUES AND OPTIONS





## Strategic Planning Context and Plan Period

- 2.1 Section 1 explained some of the strategic context within which the borough has to work, the need to be in general conformity with the London Plan and the duty to co-operate.
- 2.2 In relation to the neighbouring London boroughs there may well be cross-borough issues that affect Brent and its adjacent boroughs that are not addressed in the London Plan. Alternatively they may require a greater level of detail in the Brent Local Plan than in the London Plan. These might for instance be related to the West London Vision for Growth Action Plan; planning for an Opportunity Area that spans more than one borough e.g. Burnt Oak/Colindale with Barnet; or ensuring a consistent approach to development on the edges of the borough, e.g. Kilburn High Road with Camden.
- 2.3 The Local Plan review will need to focus on a defined period of time. The time period could be one of the following options:**
- 10 years – Broadly consistent with the emerging London Plan housing target, which sets out a ten year target between 2019/20-2028/29.
  - 15 years – The NPPF suggests Local Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon in relation to housing numbers and take account of longer-term requirements.<sup>7</sup> Preparing a plan with a 15 year time horizon will be challenging. It will however potentially be easier to identify sufficient development opportunities to meet required population growth needs, compared to a longer term plan.
  - 20 years – The emerging London Plan has a timescale to 2041. Although it will be more challenging, preparing a longer-term plan to 2041 might have some advantages. It will provide greater clarity over the long term spatial strategy. This will for instance allow larger areas to be planned for more comprehensively, rather than an otherwise incremental approach that might arise through shorter term plans.

A longer-term plan might allow for better opportunities for place-making and a greater critical mass of new communities could lead to better infrastructure planning and provision. It could also increase the likelihood of meeting longer term housing/employment targets through providing certainty that sites, which can take a long time to come forward for development, will be supported through the planning process.

- Hybrid – It could take a mixture of medium to long term, with greater clarity provided for the medium term for specific sites/areas, but for instance in relation to growth areas indicate preferred or indicative directions of expansion in the longer term.
- 2.4 Whichever option is selected the Local Plan will be a living document which is kept under review to take into account changing circumstances.

**Question 1: What are the cross-London borough planning issues that Brent should take account of in the Local Plan review?**

**Please list each issue and associated Borough.**

**Question 2: What timescale should the Brent Local Plan review focus on? Should it be:**

- **10 years**
- **15 years**
- **20 years**
- **A hybrid**
- **Other. Please specify**

**Please explain why you have chosen the option you have.**

<sup>7</sup> NPPF Paragraph 157

## Bringing together Local Plan Documents

- 2.5 The Brent Local Plan currently comprises a number of documents as introduced in section 1. To replace all these documents in this Local Plan review process will require a significant amount of resource.
- 2.6 Considerable time has elapsed since the **Core Strategy** and **Site Allocations** plans were conceived (over 10 years) and eventually taken through to adoption. Since then there have been significant changes to national and London Plan policy. Most of the site allocations have either been developed or have started on site. To reflect the changes in circumstance and in particular address the challenging growth agenda for Brent, the council considers that policies within these documents are likely to be the focus of the Local Plan review.
- 2.7 In relation to the **Wembley Area Action Plan** and the **Development Management Policies**, more of the policies are likely to still be fit for purpose, either as is or with minor modification. In terms of reducing confusion around the multiplicity of plans, the review process provides the opportunity to tie all plans together in a single document. The process will however need to be clear about what is changing and therefore open for comment and what is remaining unchanged.

**Question 3: Are there any policies you consider are still relevant, need changing or are not needed? For each policy explain why and if necessary any minor changes that each policy might require. See Appendix A for list of policies.**

**Question 4: Should the Plan tie together all policies into a single document? Yes/No**

**Please explain your answer.**



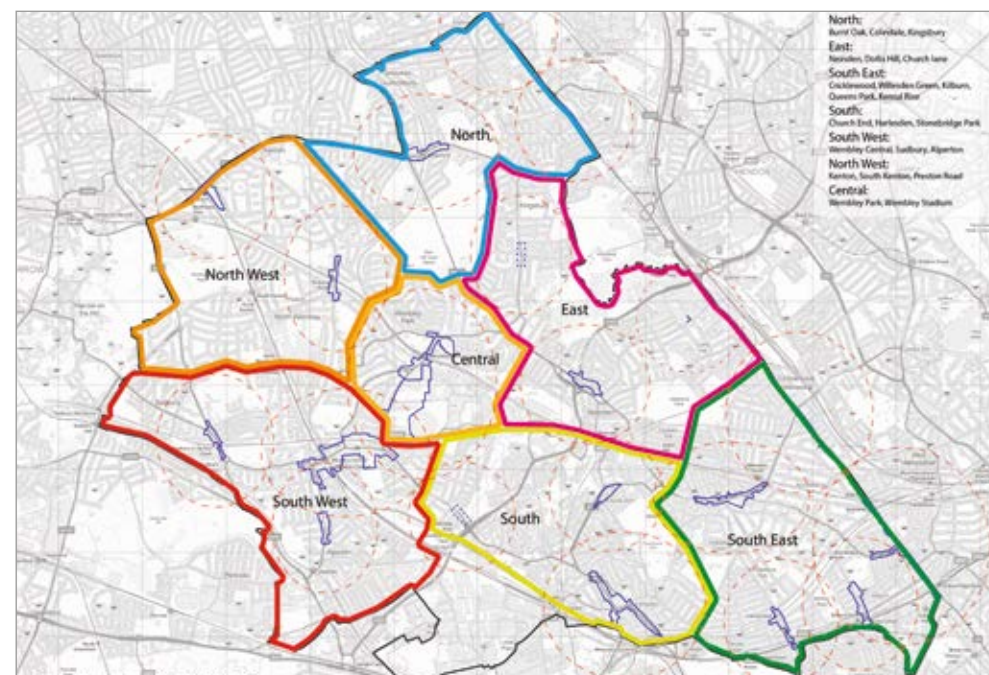
## Structure and form of the new Local Plan

- 2.8 The primary role of a Local Plan is to provide clarity for all on what the local planning authority considers will be acceptable development when determining planning applications in its area. It can also fulfil other roles. It can be regarded as a promotional document to attract inward investment, or to promote to existing or new residents or businesses. It can support bids for funding from central government, the Mayor and other sources, e.g. Heritage Lottery Funding.
- 2.9 The Plan has the potential to be a dynamic document addressing things that are very important to improving the quality of life and how a place works. It addresses a wide range of issues from a spatial perspective. It can provide and encourage a more 'joined up' approach in the council's and other organisations' decision making and actions. This will steer decisions on how to allocate resources and seek to work together to address important social, environmental and economic issues.
- 2.10 Many plans however have ended up being documents that are 'dry', overly long, full of technical language and not user friendly; particularly for the non-planning professional. This review provides the opportunity for Brent to make the Local Plan a better presented and structured document. This reviewed Plan will not replicate higher level policy, only add to that where it is appropriate related to Brent's circumstances. These circumstances will be set out in the following sections of this consultation document.
- 2.11 The recently adopted Brent Development Management Policies document was a move in the right direction. It aimed to be succinct, recognising that its policies would deal with most types of applications the council would receive, but not have a policy for every eventuality. It sought to reference but not replicate national or regional policy, be aesthetically appealing in terms of structure and presentation and easy to read. Undoubtedly however, what was achieved can be improved upon.
- 2.12 Engagement undertaken so far in working towards the preparation of a draft Local Plan has indicated Brent's size and diversity make it difficult for most people to think of the borough as a single entity. More so, it is characterised as a series of different places or neighbourhoods. For the most part, people were principally interested in their local area. Although there were facilities/places that were of wider importance, for instance for work or to meet other needs such as religious practices, recreation, shopping or meeting health needs. To this end, the Plan might feel more

relevant to the majority of people if, for some matters, Brent was seen as being made up of a number of smaller areas.

- 2.13 In terms of considering the areas which make up Brent, there has to be a balance struck. This needs to identify sufficient areas to make the plan feel more locally relevant. On the other hand the areas should not be so small that they become too numerous. This would potentially bog the plan down by straying away from the strategic into issues that are of a neighbourhood level, best addressed in neighbourhood plans. The council considers that splitting the borough up into seven or so places would probably provide the right balance. Its attempt at defining these places is shown in Figure 3. The rationale for defining the area boundaries is to essentially use the catchment areas of the Town Centres. These have been identified in the draft London Plan policy SD6, as these are "*the main focus for Londoners' sense of place and local identity in the capital*". It is recognised in reality that boundaries between places are generally 'fuzzy' where there are not significant physical boundaries such as railway lines, rivers or trunk roads to provide clear demarcation.

Figure 3: Brent Local Plan Place Boundaries



2.14 Many of the issues that planning addresses are cross-cutting. Yet historically plans have tended to separate matters into chapters such as transport, housing, environment, etc. Such an approach might have benefits in the sense that it is clear where users might find a policy for a particular subject. It also often neatly fits into professional areas of expertise. For instance, intuitively car parking standards would most likely be subject to a policy in the transport chapter.

2.15 On the other hand it ignore the links between different subjects, and might mean wider outcomes of a more joined up approach are undermined. Taking parking standards as an example, historically from a transport expert's perspective, the focus might have been on ensuring sufficient off-street parking with a view to ensuring free-flow of traffic on roads. Whilst this has merit in focusing on a specific outcome beneficial to some, in isolation these outcomes might adversely impact on quality of place or health and well-being for more.

2.16 There are other ways of showing a more joined up approach, such as grouping the plan's policies in chapters based on themes, e.g. work, rest or play. Perhaps they could focus on how Brent can contribute to internationally agreed sustainable development priorities from the Rio Earth Summit. This would be the three Habitat 3 New Urban Agenda Priorities of: Social Inclusion; Environmentally Resilient and Sustainable Urban Development; and Urban Prosperity and Opportunities for All. Although these might promote more joined up thinking, the distinction between the themes perhaps is not clear cut and so might lead to confusion in relation to policy location.

**2.17 The initial thoughts of the council on the structure are:**

- Vision, Strategic Objectives
- Borough wide policies, either related to subject matter or themes
- Place based policies rooted in the characteristics of the locality. This would also include site allocations
- Development Management Policies

**Question 5: Is the proposed structure of the Brent Local Plan as set out in 2.17 the most appropriate? Yes/No**

**If not, please explain what other structure may be appropriate.**

**Question 6: Are the places shown in Figure 3 appropriate as a way for recognising more locally relevant areas? Do you have any comments on this approach, or perhaps suggestions for more locally relevant names?**

**Question 7: How should strategic borough wide policies be grouped:**

- **By theme e.g. housing, transport, open space**
- **Live, work and play**
- **Social Inclusion; Environmentally Resilient and Sustainable Urban Development; and Urban Prosperity and Opportunities for All**
- **Other. Please explain.**



## Vision and Objectives

2.18 To provide clarity on the type of place Brent is anticipated to be and what it will seek to achieve from development the Local Plan should set out a vision. The vision should be ambitious, but achievable. Ideally it will be short, but also spatially distinct, picking up on the characteristics that make Brent different to other areas. In addition to support this Vision, strategic priorities will prioritise outcomes and provide a reference point that ground and justify policies in the Plan.

2.19 Brent has a vision set out in the Core Strategy 2010. It is important that in moving forward with the Local Plan that the existing vision is tested and if necessary amended to reflect circumstances moving forward. It could be subject to radical alteration, or might essentially be considered fit for purpose with some minor modifications. The adopted 2010 vision is:

### 2.20 “In 2026, Brent will:

- Be a dynamic London borough, with a new and iconic Wembley at its core providing new jobs, homes, retail and leisure attractions
- Retain its industrial and manufacturing sectors by providing modern and upgraded premises in a quality environment
- Be a borough of opportunity, maximising the potential of its youthful population through new and improved education and training facilities
- Provide a range of homes that are affordable and meet the needs of its diverse communities
- Be a healthy and safe place to live, benefitting from high quality urban design, attractive open spaces, first class sports facilities, and green and safe walking and cycling routes
- Host inclusive community and cultural facilities which enable full participation of its diverse communities
- Retain its smaller centres which provide important local services to their immediate area
- Be fully integrated in to the city with excellent public transport inter changes and connection to other strategic centres in London
- Use energy and resources in an efficient and sustainable manner, playing its role in addressing the global challenge of climate change”





## 2.21 In addition the Core Strategy sets out 12 strategic objectives:

- To promote economic performance and regeneration
- To meet employment needs and aid the regeneration of industry and business
- To enhance the vitality and viability of town centres
- To promote the arts and creative industries
- To meet social infrastructure needs
- To promote sports and other recreational activities
- To achieve housing growth and meet housing needs
- To reduce the need to travel and improve transport choices
- To protect and enhance Brent's environment
- To achieve sustainable development, mitigate and adapt to climate change
- To treat waste as a resource
- To promote healthy living and create a safe and secure environment

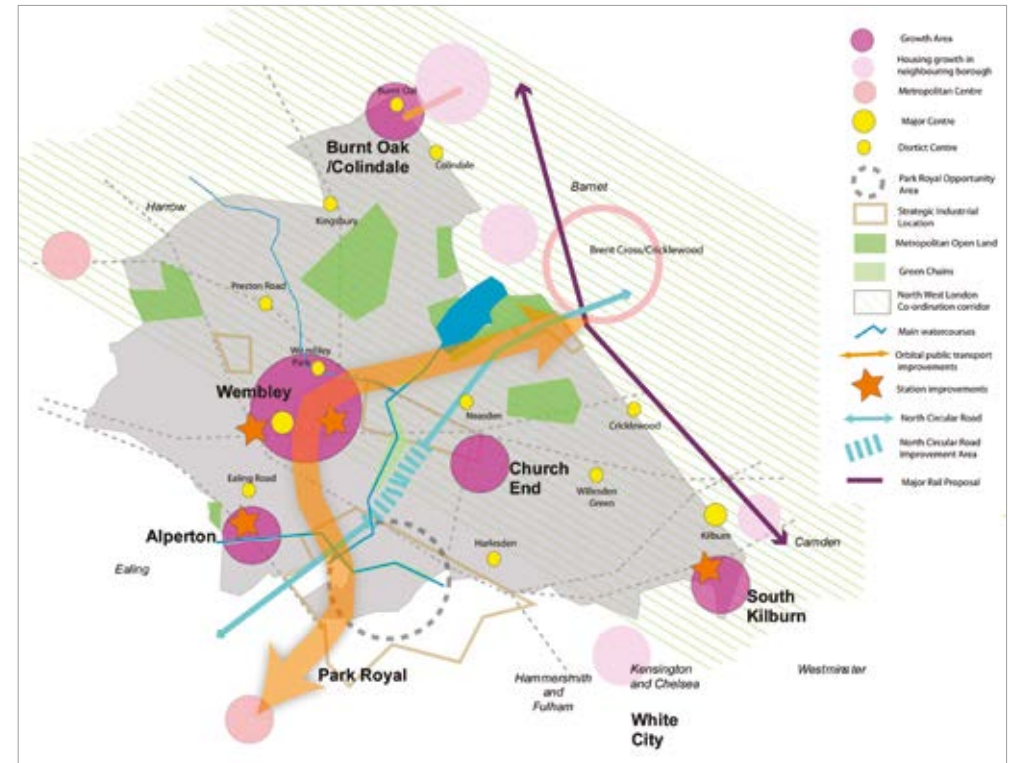
2.22 Subsequently the council has set out an updated corporate vision for Brent in non-planning documents such as the **Brent Borough Plan 2015-19**. Other public sector organisations also have their visions for Brent's future, often related to their focus, e.g. related to health for the Brent Clinical Commissioning Group.

2.23 The vision needs to be updated to reflect the end of the Local Plan review period. Engagement over the last year indicates that the majority of the vision's contents are matters that Brent's people and businesses highlight as important to them. The same is also true of the strategic objectives. Nevertheless, the borough has changed significantly over the last 10 years. By the end of the Plan period it is likely to be a very different place in many parts compared to now. In addition in relation to the vision, whilst there is reference to Wembley, little is spatially specific to identify it as very distinctive to Brent. Engagement indicates that many people consider that too much emphasis has been placed on Wembley to the detriment of other parts of the borough.

- 2.24 Creating a long term vision is difficult due to the changes likely to take place in the future which we cannot predict or are not aware of. Thinking back 20 years ago, the internet was in the early stage of development and there were no smart phones. Today these are essential parts of most people's lives. They impact on their daily activities and the way that they relate to other people and the environment around them. How will Brent need to plan for and should the vision include issues such as becoming part of a smart city, plus innovations such as artificial intelligence, electric and automated vehicles?
- 2.25 For the strategic objectives the reference to employment is, perhaps because of the recession at that time, focussed on regeneration of industry. This might not be as relevant today, particularly taking account of employment trends where there is a reduced reliance on manufacturing for jobs and the growth of alternative business sectors. In addition Park Royal no longer falls under the remit of Brent as a local planning authority.
- 2.26 The Plan will need to include a 'Key Diagram'. This is an overview drawing that sets out the spatial vision and indicates key existing and future features within the borough. An example taken from the Core Strategy is included in Figure 4 on the right page.



**Figure 4: Brent Core Strategy Key Diagram**



**Question 8: What should the 'vision' be for the new Brent Local Plan and why?**

**Question 9: What should the strategic objectives be for the new Brent Local Plan and why?**

**Question 10: What should be shown on the Key Diagram of the new Brent Local Plan?**

# Heritage, Character, Urban Design and Tall Buildings

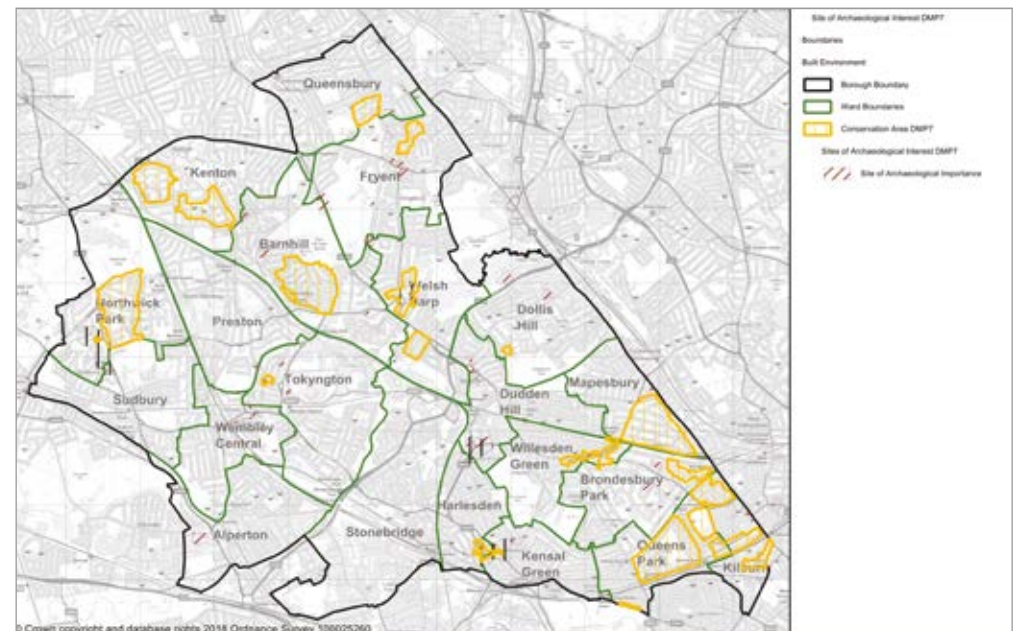
## Brent's Character

- 2.27 Brent's prevailing character is primarily based on a variety of suburban residential typologies, associated with rapid growth of London from the 1870s until the 1930s. From the late Victorian and Edwardian periods it was essentially denser 2, 3 and 4 storey terraces, semi-detached or detached. This is principally towards the south of the borough and elsewhere along historic movement routes such as the A5 Watling Street or earlier commuter railway stations, such as Willesden Junction. From the 1920s-30s a lower density typology of 'Metroland' suburbia prevailed, associated with underground/ overground commuter stations. This with the exception of town centres was typically of two storey properties.
- 2.28 The earlier suburbs had a finer grain mix of uses, with the higher densities supporting more local shops and facilities. The latter's lower density supported fewer local facilities and moved towards separation of uses, particularly of commercial premises into larger industrial estates.
- 2.29 Isolated interventions of estate renewal in the 1960s/70s and more recently since 2005 have seen taller buildings of 20 plus storeys, which depart from the typical historic scale. Green infrastructure has played an important part in defining the character. Earlier suburbs contained larger street trees and a more limited number of larger 'grandeur' parks, whilst latter ones contained smaller scale, more ornamental street trees and a greater number and range of parks and incidental open spaces.

## Heritage Assets

- 2.30 In relation to its size, Brent's cultural offer in terms designated heritage assets such as **listed buildings**, historic parks and garden, **conservation areas** and Archaeological Priority Areas is less than for instance adjacent boroughs such as Camden. See Figure 5 for the extent of heritage assets in the Borough. Brent has limited nationally recognised environmental designations such as these, and other landscape and ecological 'constraints' to development. This emphasises the need to protect those assets that do exist. The suburbs, historically referred to as 'Metroland', have a uniformity and lack of diversity of character. This can mean that introduction of new development typologies, increased building heights or substantially greater densities is likely to have a more obvious impact there than if the areas were already mixed.

Figure 5: Map of Heritage Assets in the Borough







LONDON BOROUGH OF BRENT  
**STAG LANE**  
HAB

This mural was painted for the local community  
by the pupils and friends of Barnfield School in



## Characterisation and tall buildings

- 2.31 Work commissioned by **Historic England**<sup>8</sup> indicates that intensification can take place, but that in the best new developments, it is clear that when an understanding of local character has informed design proposals, the result is always better. Key elements to integrate are: historic street patterns being respected; the relationships buildings have with the street are critical; clear building entrances; heights of a human scale; and the arrangement of massing and the articulation of facades. The re-interpretation of historic typologies such as the mansion block allow higher density to be introduced in areas with relatively low building heights. In addition the incorporation of green infrastructure is also a critical element.
- 2.32 Brent has undertaken and published some detailed character analysis related to its conservation area appraisals and character statements. For other parts of the borough the analysis has not yet been as detailed. In terms of addressing density of development, it currently categorises areas as traditional, transitional and transformational (see the **draft Brent Design Guide**<sup>9</sup>). Development in traditional areas has to be in scale with the surrounding area and respond to its context. The transitional allows for greater scope of flexibility, in recognition that it is predominantly the area between the traditional and transformational areas. In transformational areas the widest range of flexibility is allowed, recognising the wholesale redevelopment of a place, often at a much greater density than what preceded it. It is in these areas that Brent's highest density and taller buildings are most likely to be seen as appropriate. Transformational areas are essentially Brent's Growth Areas. (See Figure 6)
- 2.33 To address the growth challenges set by the London Plan the council will need to undertake further work analysing the existing character of places. This should inform choices and policy for acceptable future development. The draft Lond`

**Question 11: Brent currently has 22 conservation areas. Their boundaries can be viewed here. Are there any other areas of Brent that have a special character, and you feel are worthy of becoming a conservation area? Please identify the areas and justify why it should be a conservation area.**

**Question 12: Are there any existing conservation areas which have lost their special character and should no longer be designated? Please identify the areas and justify why it should no longer be a conservation area.**

**Question 13: In addition to conservation areas, are there any other areas with a special character which should inform the types of new development that will be acceptable in those areas?**

**Question 14: Are there any areas of Brent which are in need of regeneration, where new development should be encouraged to change and improve character?**

**For these areas suggested, please state why.**

**Question 15: To meet what will be challenging growth needs for homes, businesses and infrastructure should Brent:**

- **encourage more tall buildings (over 30 metres) in the borough? Yes/ No**  
  
**place greater emphasis on higher densities in lower rise buildings, even if this means compromising some existing standards sought, e.g. reducing on site open space requirements? Yes/ No**
- **height and density to be informed by the character of the area? Yes/ No**

**Please explain any answer provided.**

**Question 16: Where do you consider are the most appropriate or inappropriate areas for tall buildings and why?**

<sup>8</sup> 'Historic England: London's Local Character and Density' Allies & Morrison August 2016

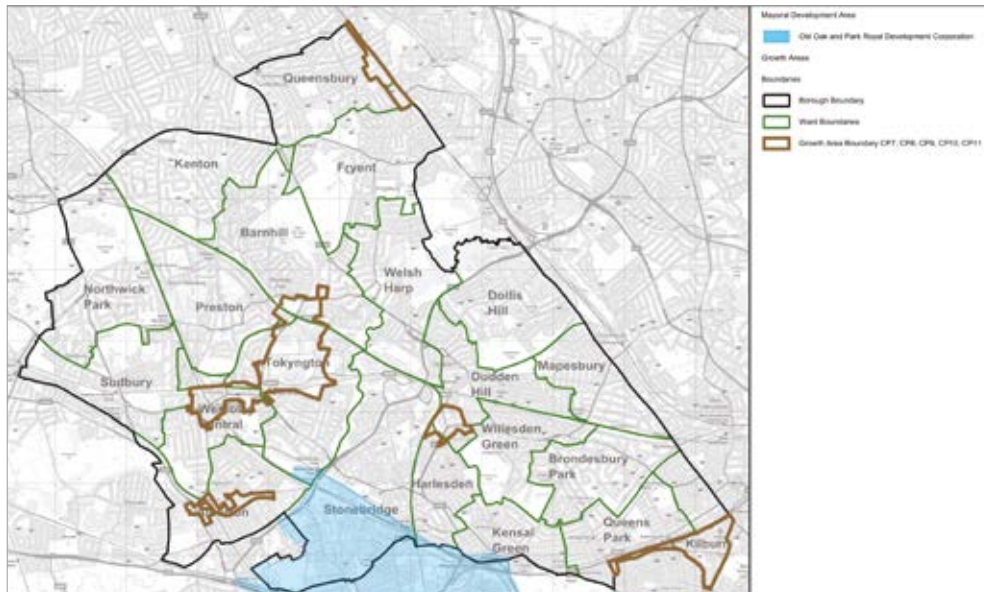
<sup>9</sup> Brent Draft Design Guide SPD1 July 2017

# Spatial Distribution of Priority Areas for Development

## Growth Areas

2.34 The current Local Plan identifies priority areas for development. These are 5 Growth Areas: Alperton, Burnt Oak/Colindale, Church End, South Kilburn and Wembley as shown in Figure 6. These are where the majority of additional homes within the borough were to be located. Wembley is the largest in both extent of area and anticipated volume of development with 11,500 dwellings planned.

Figure 6: Brent's 5 Growth Area



2.35 The identification of priority areas for development from a planning perspective has a number of merits. It provides more certainty for existing communities and landowners/developers. A critical mass of development allows for a more co-ordinated approach to delivery, can create positive change based around a sense of place, and supports planned infrastructure delivery. A significant downside is that sometimes delivery may be slower than anticipated. This might be if there is one landowner/developer who might not be in a position to take forward a site, or a critical piece of infrastructure to open up a site and allow development to proceed is delayed.

## Wider dispersal of new development

2.36 In contrast a more dispersed approach can potentially reduce risk associated with reliance on one landowner/developer. Nevertheless, it can create uncertainty for existing communities and landowners/developers. It may be perceived to undermine the character of a wider number of areas. It can also increase uncertainty about delivery as it is more likely to rely on 'windfall' development, rather than site specific allocations. It can also result in a cumulative pressure on existing infrastructure that is difficult to tackle. This can be due to a lack of: certainty where development will occur; critical mass; or, availability of land to support new or extended facilities

## Opportunity locations for new development

2.37 In terms of national and London Plan policy, areas with high levels of public transport accessibility are identified as higher priority areas for development, where higher densities are allowed or even required. The assumption is that such areas reduce potential reliance on the private car, whilst having the critical mass to support facilities to meet the majority of everyday needs, or providing the opportunity to meet those needs more easily elsewhere.

2.38 National planning policy also has a sequential approach to locating high trip generating uses, such as retail, leisure, office, health and more recently residential development in town centre locations. More often than not historically these town centres are also areas with high levels of public transport accessibility. They either grew up alongside principal movement corridors/ trade routes, or public transport has increased to serve them as they generate sufficient patronage to support viable services.

2.39 The council will have to pro-actively plan for the predicted growth of Brent's population. The scale of growth is considerable. Ideally the council would like to be able to specifically identify where growth can proactively be accommodated. The existing Growth Areas have a number of characteristics that might well be replicated in other areas of Brent not previously identified for development, which means that these areas should now also be considered.

**2.40 Reflecting the characteristics of previous growth areas these might include:**

- a) predominantly Council or otherwise single owned estates where:
- the accommodation could be considered essentially obsolete either due to the fabric of the building, the accommodation type or the development's layout creating unacceptably poor living conditions for occupants;
  - at a density that is now inconsistent with its proximity to major public transport infrastructure (existing or proposed/within or outside Brent);
  - exhibit an unbalanced tenure mixture which is adversely affecting occupants' life chances and accessibility to quality infrastructure; and
  - there is local engagement and support for growth, or
- b) under-used or vacant large scale employment or other non-residential use areas which are:
- close to good public transport/potential to improve public transport; and
  - provide an opportunity for wholesale change to provide new higher density communities

2.41 Alternatively in the context of the Mayor's high housing targets, perhaps a more radical approach is required towards existing predominantly sub-urban housing within areas defined by the Mayor as within PTAL 3-6 or 800 metres of tube station, railway stations or town centres boundaries. The draft London Plan policy H2 states: "Boroughs should.... recognise.... Local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments". This context might well promote for instance include its wholesale redevelopment at higher densities, rather than a more piecemeal approach of reacting to smaller scale applications that might well come forward as a result of the Mayor's policy.

2.42 In addition the existing Growth Areas might also have the potential to accommodate further growth within their boundary, or adjacent to it. For example the recent review of South Kilburn masterplan indicated additional capacity on known as well as on previously unidentified development sites. For the Alperton Growth Area, the council identified the largely vacant Northfields industrial site as having the potential for a large predominantly residential led new community to be incorporated in a new London Housing Zone. Similar opportunities might also exist elsewhere.

2.43 In terms of more dispersed forms of development, the draft London Plan identifies that existing homes and other small areas of developed land in Brent have the potential through redevelopment or conversion to provide a significant proportion of Brent's new homes requirement.

To date, although there has been some conversion activity of Brent's 'Metroland' 1930s two storey homes into flats, additional dwellings within plots, or the redevelopment of homes to be replaced with flats, this activity has been relatively limited.

**Question 17: Should the council continue to focus on identifying Growth Areas as the principal locations for development activity to accommodate needs related to population growth? Yes / No**

**If yes, do you have any suggestions for new Growth Areas?**

**Question 18: Are any of the Growth Areas able to accommodate more development than currently identified within their boundaries, or can their boundaries extend to accommodate more development, including infrastructure that might be needed, to either supplement or enhance their success as a place? Yes/ No**

2.44

If yes, do you have any suggestions for where existing Growth Areas could be extended and the types of appropriate uses?

**Question 19: The Mayor's draft policy promotes higher density housing in suburban areas with greater public transport accessibility. Should this be through:**

- conversion/ extensions to existing buildings,
- infill in spaces between buildings,
- comprehensive redevelopment of sites, or other?

Please explain the reasoning for the choice you made.

**Question 20: What other alternatives are there to delivering the level of development that will support the growing population needs of Brent, but also create good places?**

**Question 21: The council has previously undertaken a 'call for sites' with potential for development. Are there any specific sites that you are aware of that can be identified as Local Plan site allocations and why they should be allocated for development?**



# Housing

## Brent's Housing Target

- 2.45 The overriding issue currently is lack of supply to meet needs. This has a multiplicity of other impacts essentially related to affordability, such as people living in accommodation that is unsuitable for their needs. The draft London Plan seeks to address overall needs by ensuring that across London the boroughs meet the annual housing needs through positive planning policies. It sets a target for Brent of 29,150 additional dwellings to be delivered from 2019/20-2028/29 based on what it considers is achievable taking account of available sites.
- 2.46 Government has recently consulted on a new methodology for setting housing targets. This provides an initial annual target for Brent of 2855 dwellings per annum (but this would initially be capped at 2135 for the next 5 years). Government does however acknowledge that this need figure could be absorbed into a London-wide housing target and then left up to the London Plan to decide how to distribute that need. Brent commissioned a **Strategic Housing Market Assessment** two years ago about what its housing needs are. This indicated the need for an additional 1826 dwellings per annum. The identification of needs is the first step in the planning process, the next step is the identification of sites to meet needs. This deliverable supply informs the target that the Local Plan will set.
- 2.47 The council wants to ensure that it plans as best as possible to meet Brent's housing needs. It has delivered some of the highest numbers of homes, including affordable homes, across London over the last decade. The council recognises and supports the need to provide significant numbers of additional dwellings. Nevertheless, it does not consider The draft London Plan target for Brent to be achievable. This is primarily due to The London Plan's over-emphasis of the potential of development on small sites, the limited availability of larger sites, but also other factors such as potential market saturation, availability of funding to finance housing development and the skills/capacity of the construction industry to deliver.

10 House Price Statistics for Small Areas Dataset 9: Median Price Paid Per Local Authority Area Mar 2017 ONS

11 Ratio of median house price to median work placed earnings per local authority area Quarter 3 2016 ONS

12 Brent Strategic Housing Market Assessment January 2016 ORS

It is hoped that this Brent Local Plan consultation process will highlight potential sites to add to what the council and GLA have previously agreed were likely to be delivered.

- 2.48 The principle of what the Mayor is trying to achieve by setting an ambitious target is supported. A high target provides a focus towards how needs are to be met across a variety of interventions. From a planning perspective however it brings risks if the council cannot show it can achieve these targets. In these circumstances national policy effectively diminishes the status of an adopted Local Plan. It could open up the risk of planning permission having to be granted on sites which the council might ordinarily consider unsuitable for homes and which the Local Plan identifies for other uses.
- 2.49 Taking account of likely site availability, Brent considers that a London Plan target more closely aligned to the Brent SHMA target and the GLA's Strategic Housing Land Availability Assessment, excluding its assessment of small infill sites (i.e. capacity for around 1900 dwellings per annum) is a more robust minimum target for the Brent Local Plan review to consider.

**Question 22: Based on the evidence summarised above, what Brent net additional homes target should the council identify is appropriate for inclusion in the London Plan?**

- **High - 2,915 per annum**
- **Medium - 2,135 per annum**
- **Low - 1,900 per annum**

**Please explain your choice.**

## Affordable housing

- 2.50 Limited supply plus a number of other market factors have led to a rising gap between incomes and house prices. Brent has a median house price of £450,000<sup>10</sup>. The ratio of house price to income for Brent is approximately 15:1<sup>11</sup>. The need for affordable housing has increased, with 52% of Brent's needs being for affordable homes<sup>12</sup>. The majority of which is at social/ Council rent levels, whilst some intermediate rents/shared ownership is

also required. There has also been a significant increase in the amount of people renting in the private sector. This change has essentially been made up of people that might previously have been able to afford/want to buy their home.

2.51 Brent's current Local Plan policies seek to maximise affordable housing provided in new developments. An overall target of 50% of the new homes being affordable is sought. Changes to national planning policy and affordable housing funding streams have now made the 50% target very challenging to achieve.

2.52 Currently the council is delivering on average about 25% affordable housing. The majority of applications are subject to a viability review. This identifies the maximum affordable housing that can be delivered whilst ensuring the development remains financially viable. Social rent requires significant subsidy and has diminished as a proportion of new affordable homes built. Wherever it can the council seeks at the very least to ensure affordable rented properties have rents that are no higher than benefits levels will cover.

2.53 The Mayor has introduced draft policy that still aims for the 50% affordable delivery as an ambition for long term delivery, but will ordinarily grant planning permission without the need for a viability assessment if 35% affordable can be delivered. More detail is provided in the Mayor's **Affordable Housing and Viability Supplementary Planning Guidance**<sup>13</sup>. Of the affordable housing to be delivered the Mayor identifies a minimum 30% low cost rent (social rent / London Affordable Rent) and a minimum 30% intermediate, but leaves the remainder of the mix to the boroughs.

Brent's current mix of tenures sought in policy, due to the needs of those requiring affordable homes, is a 70% social/affordable rent to 30% intermediate tenure split.

2.54 Government's Housing White Paper 2017 identified a desire to see 10% of new homes offered for low cost home ownership, e.g. like shared ownership. The 2017 Autumn Statement went further "local authorities will be expected to permission land outside their plan on the condition that a high proportion of the homes are offered for discounted sale for first-time buyers, or for affordable rent". Where 'windfall' sites (i.e. not allocated for housing in the Plan) come forward, the council will seek to ensure that any policy it has will seek to maximise the amount of affordable housing provided in accordance with its preferred tenure mix.

2.55 The NPPF, London Plan and Brent's Plan seek affordable homes to be on site as part of wider housing developments. This encourages greater opportunity for mixed communities. Nevertheless, it also can on occasion result in less affordable housing numbers than might otherwise be achieved by attaining a contribution for off-site affordable housing provision. This is particularly in areas where there are comparatively high house prices. Contributions attained here could build greater number of affordable dwellings in less expensive areas.

2.56 The amount of affordable housing sought and the tenure types through Brent's Local Plan will have to be subject to and supported by suitable viability assessments. The council will have to commission this work, along with other 'whole plan' viability assessment work to show that the policies in the Plan do not unacceptably impact on development by making it unviable. The last viability assessment undertaken to support the Development Management Plan policies identified 50% as an appropriate target on existing employment sites. This was accepted by the Planning Inspector subject to an understanding that flexibility on percentage would be required if viability showed this was not achievable.



<sup>13</sup> Affordable Housing and Viability Supplementary Planning Guidance 2017 GLA

**Question 23: In relation to an affordable housing target should Brent:**

- Continue to have a policy that seeks 50% affordable homes subject to viability;
- Rely on the emerging London Plan's policy of a minimum of 35%; or
- Seek a lower percentage due to viability issues?

Please explain your choice

**Question 24: Should there be greater flexibility in relation to on-site affordable housing provision where building elsewhere in the borough would provide increases in affordable housing numbers?**

**Question 25: In relation to affordable housing tenures should Brent:**

- Stick to its current preferred mix for affordable housing of 70% social/ affordable rent (capped at levels which Housing Benefit will cover) and 30% intermediate;
- Increase social rent/ affordable even if this results in fewer affordable homes overall delivered; or
- Increase shared ownership/ discounted market products for those looking to buy their home particularly if this increases affordable housing numbers?

Please explain your choice.





## Private Sector Rented Housing

- 2.57 Although there has been a very large increase in the private rented sector, the quality of product is variable. Many private landlords are small scale having a number of 'buy to let' properties. Many landlords do provide good quality accommodation; some however, do not. Brent Council has more recently sought to improve standards by seeking to introduce licensing for all private landlords. In addition the Mayor and the council are keen to support institutional investors. They are under-represented in the market compared to other countries. It is considered that this will assist in raising standards, offer better/longer term tenancies for occupiers, but also speed up the delivery of additional homes.
- 2.58 The funding mechanisms for large scale private rent mean that such developers can struggle to compete with mainstream house builders in purchasing sites. In addition they are also less likely to support the traditional format of provision of affordable housing, both in tenure type and numbers. The Mayor promotes flexibility on the part of boroughs to take these issues into account when considering the opportunities for institutional rent schemes. To assist in providing sites for institutional investors and increase delivery rates, it might assist if Brent required a certain percentage of purpose built rented sector homes. This for instance could be applied to large scale site allocations or growth areas to push down land values/provide better access to sites.

### **Question 26: In relation to encouraging greater provision of purpose built private rented schemes should the Local Plan:**

- **Have any specific Brent policies; or**
- **Rely on the London Plan's policy?**

**Please explain your choice if (a) suggest what policies should be pursued.**

## Number of Bedrooms in New Dwellings

- 2.59 Brent currently seeks 25% of new homes to be three bed or more. It also has policies that seek to retain a minimum number when existing larger homes are converted. Recent monitoring indicates that 24% of new homes in Brent are three bed or more, so provision of new larger family homes is currently relatively low.
- 2.60 In terms of homes containing three bedrooms or more, Brent's needs are very different from London's. Brent's Strategic Housing Market Assessment indicates that 65% of the dwellings needed are for 3 or more bedrooms. This is more of a requirement in the private sector (75%) compared to the affordable sector (59%). London's proportional requirement is for more one and two bed properties at 71%<sup>14</sup>. High demand for one and two bed homes, viability issues, a lack of a premium on three bed+ homes and higher density schemes are all factors pushing down the desire from developers in Brent to provide for larger family dwellings. Providing more one and two bed homes would make meeting Brent's targets easier to achieve; less space would be required and therefore more homes could be fitted on each available site. This would however either result in many Brent residents in larger households being forced to live in overcrowded homes, or require them to move elsewhere where they could meet their housing needs.

### **Question 27: Should Brent continue to support the provision of family sized housing (3+ beds) by setting a minimum percentage target? Yes / No**

**If yes, what should this target be and why?**

## Specialised Housing Needs

- 2.61 As well as mainstream market and affordable homes there are a variety of other types of accommodation required to meet Brent population's needs, some of it quite specialised. In terms of numbers, some of these needs are quite significant. Providing housing, although not necessarily supported housing, that is attractive to older people in particular will help reduce under-occupation of homes. Addressing this issue could mean less new build family homes will be required to meet needs. It is anticipated that the market will increasingly seek to address these needs, there might however be a role for planning policies to play a part in ensuring greater likelihood of needs being met.
- 2.62 In addition Houses in Multiple Occupation (HMO) are accommodated in approximately 19,000 of Brent's dwellings. The cost of self-contained homes means that demand for this market sector is likely to continue to grow. Although in their infancy, there have been some larger scale 'collective'/ co-living housing schemes elsewhere in London that have sought to cater for this market. As with institutional renting, this could provide benefits in terms of better quality accommodation for tenants and better management, which reduces adverse impacts on neighbours. It would also free up self-contained homes.
- 2.63 Brent's good connectivity and easy accessibility to other parts of London more recently has made it a preferred location for institutional student accommodation providers. Some areas such as Wembley Park are at the 20% of the resident population cap set in Brent policy. This accommodation does however contribute to meeting Brent's housing targets (three bedrooms = one dwelling) and students can bring a different type of vitality and viability to a place. London's overall requirement for purpose built student accommodation will double by 2041.

**Question 28: How can planning policies provide attractive alternative forms of accommodation that will encourage older people who are 'under-occupying' larger properties to move?**

**Question 29: Are there areas of Brent other than Wembley Park which should be identified as preferred locations for student accommodation?**

**If so where and why?**

**Question 30: Taking account of the effects so far in Wembley Park, should a higher or lower proportion than 20% of the population living in purpose built student accommodation be allowed in that or any other area? If so, what proportion should be acceptable and why?**

**Question 31: As with student housing, should there be limits on other types of specialised accommodation, such as Houses in Multiple Occupation, to ensure that there is not an over-concentration within a particular area? If so, what types of accommodation and what proportion should be acceptable and why?**

- 2.64 Government is keen to support self-builders. It has placed a statutory duty on local authorities to provide for sufficient sites for self-build housing. To date Brent has had limited numbers on its self-build register. The number of small site planning permissions it is granting means it can show it is discharging this requirement. Nevertheless, some others are being much more pro-active by stating that a certain percentage of dwellings on larger sites should be allocated for self-build. It is not clear how this would sit with the likely higher density requirements of new housing in Brent, although it would probably not preclude self-build blocks of flats or terrace townhouses
- 2.65 In addition, Brent's needs assessment identified a range of other specialist housing types generally of a supported nature for the elderly. In addition there will be requirements for homes for the more vulnerable in society with issues such as mental illness, learning disabilities, substance abuse and domestic violence. Some of these uses will be delivered as part of the affordable housing negotiated on a site. For others Brent currently has policies that are positive about their protection, or the development of new facilities in preferred locations (access to facilities/public transport) with suitable management conditions and where it does not lead to an over-concentration of these types of uses.
- 2.66 Brent needs to provide for suitable opportunities for those with an itinerant lifestyle (such as travellers/gypsies and boaters) to be able to meet their own needs. The council has commissioned a study in association with other West London Alliance members to identify these needs. At the very least it is anticipated that another travellers' site to accommodate permanent and associated visitor pitches will be required.

**Question 32: What policies does Brent need to ensure that the wide range of specialist housing needs are met, including supported housing for older people? Should it have:**

- Generic policies setting targets that apply across Brent;
- Allocate specific sites;
- Place a percentage/ number requirement on larger scale allocations/ growth areas; or
- Do nothing as the market is best placed to provide sufficient capacity to meet needs?

Please explain your choice

## Employment

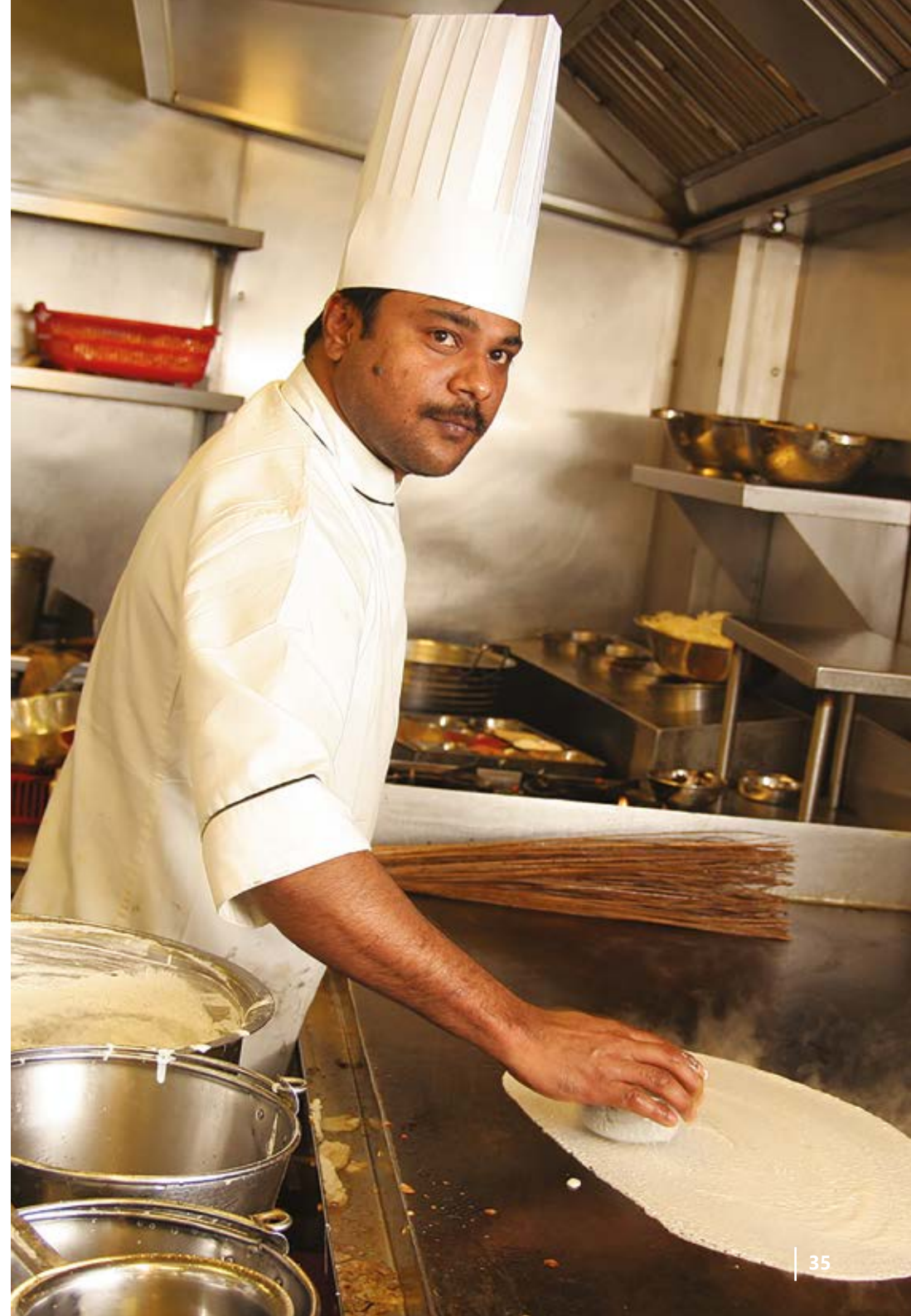
### Loss of in-demand employment and office space

2.67 On the basis of previous evidence at a local and London wide level previous versions of the Brent Local Plan meant that the best employment land was identified and subject to policies restricting its loss. Much land surplus to needs was however identified or allowed to be developed for alternative uses. The surplus sites provided a valuable opportunity to provide for additional homes. More recent evidence indicated a more limited surplus and in 2017 Brent amended its Local Plan to be much more restrictive about the amount of employment land that could be released.

2.68 One of the Government's initiatives to accelerate housing delivery has been to allow change of use of offices into new dwellings without the need for planning permission. It has also introduced something similar for small scale light industrial and storage premises. While this has helped with the aim of housing delivery, it has led to the loss of 33,287 sq m office floorspace in Brent in the last 3 years. Assuming a generous 15 sq.m. per person to reflect the quality of the stock lost, this could have accommodated approximately 2219 full time employees.

This loss is despite **Brent Employment Land Demand Study<sup>15</sup>** demonstrating, based on population growth, a need for the net supply of a further 32,600 sq m and 52,350 sq m in office floorspace until 2029.

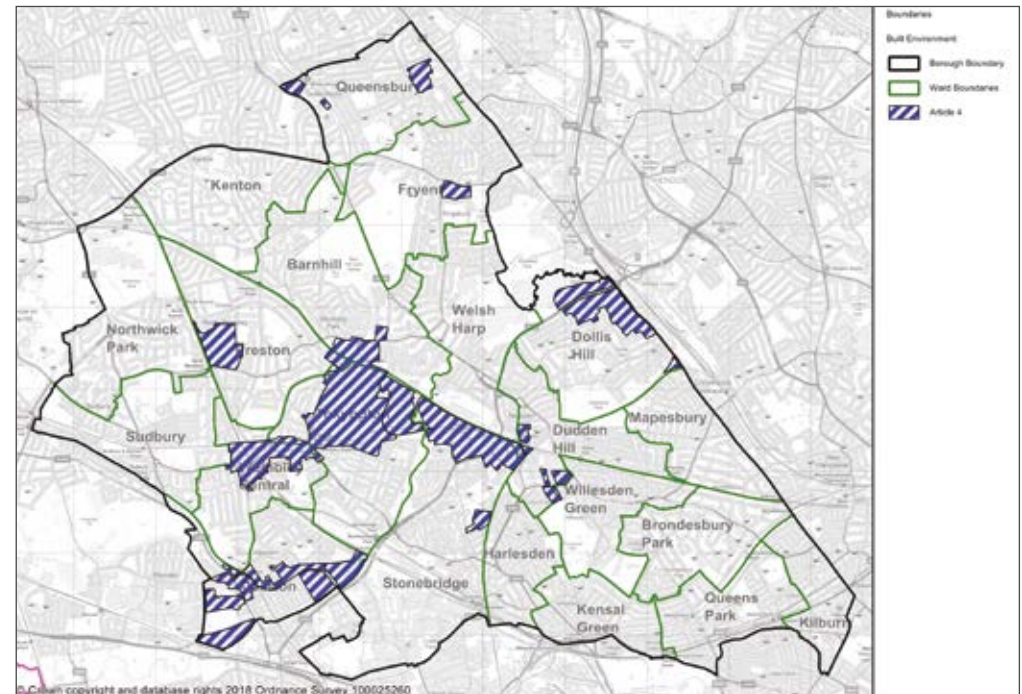
<sup>15</sup> Brent Employment Land Study Final Report July 2015 AECOM



2.69 London Plan policies seek to protect the role of the Central Activities Zone (Central London/City/Canary Wharf) as the prime location for office development. Like most of outer London, Brent is not currently recognised by commercial office developers as a priority location for investment. In the short term there seems no prospect of speculative office building occurring to address the needs of smaller businesses. If the loss of office space continues unfettered, it provides a significant risk to the proper planning of meeting Brent’s employment needs. It has the potential to further displace such activity out of the borough.

2.70 Taking account of recent evidence Brent has sought to address this loss of space through the introduction of an **Article 4 direction**. (see Figure 7 for area covered). This is due to come into effect in August 2018. It will require planning permission for change of use of offices and other employment uses to new dwellings. Initially this will be in Wembley and Alperton growth areas along with all Brent’s Strategic Industrial Locations and Locally Significant Industrial Sites. This will allow the council to balance up the merits of providing new homes, versus the need to provide sufficient opportunities for businesses to successfully operate in Brent. This does not mean that changes of use from offices will be refused. The council might well be able as part of any planning permission to seek provision of workspace for which there is a growing need (such as co-working space) as well as residential dwellings. Currently without an Article 4 this might not be the case outside these across the rest of Brent.

**Figure 7:** Proposed Article 4 Direction Area to Require Planning Permission for Change of Offices and small scale light industrial and storage and warehousing to dwellings houses



**Question 33:** Rather than accept continued loss of employment space, should the council do more through the use of additional Article 4 directions to allow it to better plan to meet the growing needs of employment uses outside of identified Growth Areas and large scale industrial sites? Yes / No Please explain your choice.

POP INTO THE COMING SOON



## The need for a higher wage economy

- 2.71 Brent is a well-connected borough, both nationally and within London. It has numerous significant sites of industry. It is well placed to deliver jobs and growth to greater benefit its residents and businesses. Brent's economy is currently dominated by micro-businesses. These comprise 89.6% of industry in the borough. The following, typically low-waged sectors, are the largest: Wholesale and Retail Trade, Repair of Motor Vehicles and Motorcycles' (19%), 'Human Health and Social Work Activities' (15%) and 'Administrative and Support Service Activities' (8%). The median income for companies located in Brent is £31,601, below the London median of £34,473.
- 2.72 Achieving greater economic resilience plus encouraging the availability of higher-waged opportunities and associated better quality of life for the borough's residents may involve the diversification of industry type and size in Brent. To date, the council has concentrated on place-based policies for growth and development. Areas of focus have included Wembley and Alperton. The Local Plan's policies have essentially focussed on protecting existing employment areas from loss/encroachment by other uses. The Plan has not focused on seeking to protect particular employment sectors or types of businesses. It has no policies that seek the provision of co-worker type spaces or hubs that reflect the move away from the need for premises by many small businesses.
- 2.73 In a recently published **National Industrial Strategy White Paper**<sup>16</sup>, government has identified four key industrial growth sectors for investment: Life Sciences, Construction, Artificial Intelligence and the Automotive sector. This also sets out intentions to introduce technically-focused 'T Levels', invest additional funds in maths, digital and technical education and create a new National Retraining Scheme that supports people to re-skill.
- 2.74 Brent's population is well educated compared to national averages, although those educated to degree level is slightly lower than the London average. The Brent Workplace Study indicates some employer sentiment that Brent's workforce do not have all the necessary technical skills for employment.
- 2.75 Brent currently seeks to create a more direct link between new development and improving residents' employment skills and ability to access jobs in larger developments. It does this through seeking that developers provide on-site apprenticeships in the construction sector. It also does the same for some sites in relation to prospective end users.

It is also working closely with organisations such as the College for North West London in assisting these programmes, plus supporting the College's ambitious plans for consolidation to its campuses and moving to provide vocational courses that provide for higher quality employment in Brent.

**Question 34: Should the council use planning policy to support key growth sectors for development in Brent in order to attract higher wage employment?**

- a) Yes – Sectors should be in line with national aspirations;
- b) Yes – Sectors should be in line with local aspirations; or
- c) No – the market is better able to address needs as they arise

**For answers a) and b) please explain how planning policy can assist in prioritising key growth sectors and attracting businesses to the borough?**

**Question: 35: How should the council help the development of a workforce skilled for higher income employment? For example, should we plan for new centres of adult learning and reskilling?**

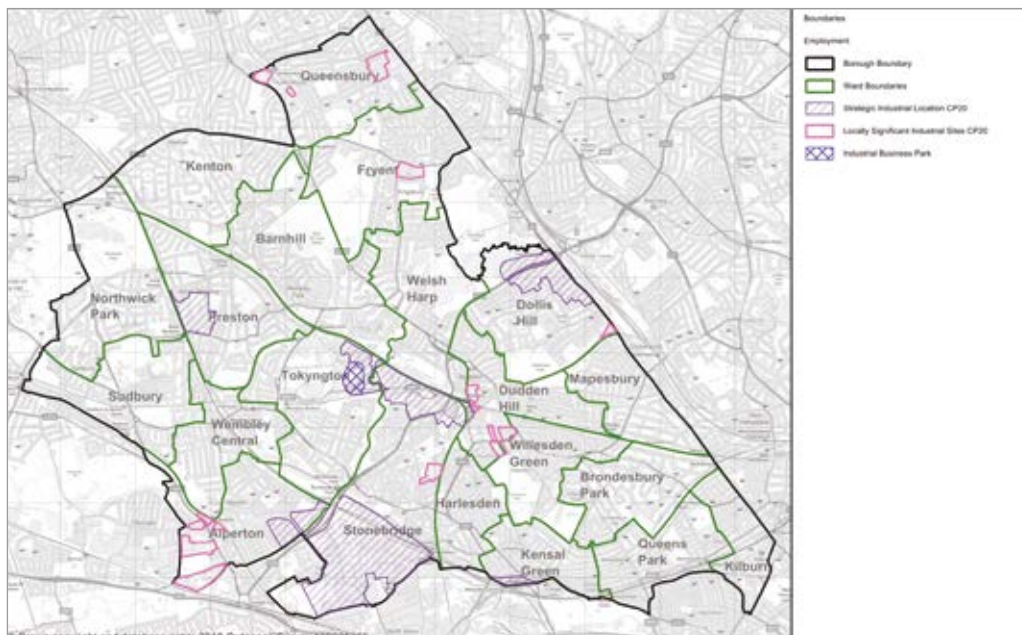


16 Industrial Strategy Building A Britain Fit For The Future November 2017 HM Government

## Providing more industrial capacity – intensification and mixed use

2.76 The new draft London Plan identifies Brent as a borough that should seek to provide further industrial capacity (this includes light industry/offices that would be acceptable in a residential setting). It goes further to suggest intensification of existing industrial sites as one means of providing this capacity, through for example increasing multi-storey industrial development. In addition ideally Brent should also provide additional capacity on land not currently identified as Strategic Industrial Locations (SIL) or Locally Significant Industrial Sites (LSIS) (See Figure 8). The Local Plan currently has policies that seeks to protect existing employment uses, particularly in SIL and LSIS. Outside these areas there is greater flexibility if it can be shown that the existing employment use is unviable. In these cases the maximum amount of employment space is sought in any alternative development allowed.

**Figure 8:** Strategic Industrial Locations or Locally Significant Industrial Sites in Brent



**Question 36:** Which sites would benefit most from intensification for employment and/ or mixed use?

**Question 37:** Are there any not previously identified sites that would be suitable for industrial purposes?

## Affordable workspace

2.77 Within Brent there is a substantial disparity in values between residential and employment uses. This, plus the Government's removal of the need for planning permission for change of use of office and small scale light industrial into dwellings has meant a significant loss of employment space in the borough. Although some space was vacant, a lot was occupied by businesses. The general reduction in availability of space has pushed up rents, impacting on starter businesses and other users that might have typically used such spaces for example cultural sectors such as artists/art venues, music studios, fashion/design or photography and crafts.

2.78 The Local Plan has policies that seek the provision of affordable workspace either in relation to site allocations where an existing employment site was primarily being developed for residential, or the potential redevelopment of non-designated employment sites for mixed uses. These have had mixed results and indicate a need for greater focus on appropriate locations, clustering of workspace and building specification to allow for their successful operation by a recognised affordable workspace provider. Where not appropriate the use of financial contributions to provide workspace in better locations could be considered.

2.79 The requirement for affordable workspace as part of employment led developments on designated employment sites has not been pursued. This was to encourage investment in new employment space.

**Question 38:** Should Brent seek to apply its affordable workspace policy to:

- All employment areas/wholly employment developments including on designated SIL and LSIS sites;
- Where loss of an existing employment use is proposed;
- Where a mixed use development is being proposed where an employment use currently exists;
- In new or existing growth areas; or
- Have no policy?

Please explain your choice.



## Town Centres

### Existing centres and retailing changes

- 2.80 Brent has a diverse range of distinct centres which form the local heart of each community. Brent's current Local Plan identifies and categorises seventeen town centres in a hierarchy. This relates to their functions and roles taking account of their size, catchment area and the range of shops and facilities provided. (See Figure 9 for the list of centres and Figure 10 for their location).
- 2.81 Changes in shopping patterns, such as moves to out of town or internet shopping have provided challenges to Brent's town centres. In addition many retailers have focussed on bigger regional stores in higher order centres whilst reducing smaller outlets. Brent's centres also face the challenge of expanded retail provision within local higher order centres such as Westfield London and Brent Cross as well as new retail provision proposed by the Old Oak Common and Park Royal Development Corporation.
- 2.82 Many of Brent's town centres, with perhaps the exception of the London Designer Outlet and Ealing Road (Indian specialist shops), do not attract people from a wider area. Brent's centres have a limited comparison goods offer and a higher proportion of small-scale convenience retailing. New retail floorspace provision within existing town centres has been limited.
- 2.83 To ensure the vitality of town centres Paragraph 23 of the NPPF requires that 'planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres'. This includes a requirement that 'needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability'.
- 2.84 The council has indicated that improving Brent's town centres is a corporate priority. The draft London Plan requires boroughs to develop and take forward town centre strategies. These are comprehensive documents that take account of the actions of all those that can influence the present and future quality of town centres. This can include planning, licensing, role of town centre managers, cleansing, events, transportation/ public realm and property. The issue of cleansing, maintenance of public realm and buildings in particular was something that Local Plan consultation to date has indicated is a concern for people and impacts on their perception of Brent's town centres.



**2.85 The council has focussed on priority town centres with a view to addressing five key areas:**

- Retail: Retain and build a high quality retail and consumer offer, but not the sole function.
- Economic growth: Maximise opportunities for commercial use (i.e. workspace), jobs and enterprise to support economic growth.
- Accessible and attractive: locations that people can easily access (physically and online), and that is a welcoming and positive environment.
- Community based: A place for the community to enjoy, through a mixed range of high quality community uses (leisure, entertainment and cultural facilities). Easy access to consumer services (public, private and voluntary sector services).
- Housing: Liveable places that providing attractive residential living options to meet housing needs and growth.

2.86 Whilst facing challenges in terms of changes to retailing, opportunities do exist related to the substantial projected increase in Brent’s population. This might not compensate for changes in retail expenditure, but provide potential for the town centres to change and diversify to meet a wider range of complementary uses to support their vitality and viability. This can for instance include the night time economy (Wembley and Kilburn are currently highlighted in the London Plan as priority locations in the Mayor’s **Culture and the Night Time Economy SPG**) and cultural facilities such as restaurants, theatres/cinema, galleries, music venues, clubs, religious facilities and hotels to extend the length of time the centres attract more/ different people throughout the day. Other possibilities are for office or other employment uses, and also due to their range of facilities and public transport, they provide a good location for new dwellings.

2.87 Policy SD6 of the draft London Plan <sup>17</sup> discusses the redevelopment of town centres for residential use. It identifies that the potential for new housing within and on the edge of town centres should be realised through higher density mixed-use or residential development. Wholly residential schemes in town centres may be appropriate outside of primary and secondary shopping frontages.

Town centres are seen as particularly suitable for smaller households, Build to Rent, older people’s housing and student accommodation. The Mayor is clear however in the draft London Plan that ‘agents of change’ such as residential or hotels should not undermine the potential of existing uses such as music venues to remain as viable concerns. It will be for the new uses to satisfactorily address the amenity of their residents, rather than for existing uses to change to accommodate residents.

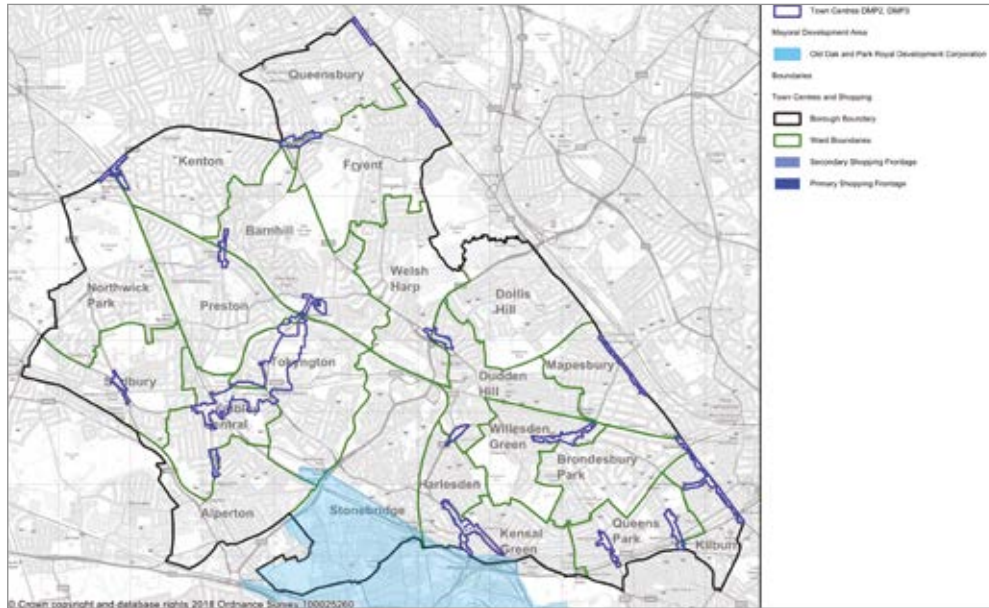
2.88 Consultation on the Local Plan to date has indicated that some of Brent’s town centres are considered to be too long, having an offer that is diluted by it being over a wider area. They would be more attractive if there was a better offer contained within a smaller area. This appears to, in association with other needs related to providing additional homes, employment or other offers within town centres, point to the need for some contraction of the extent of existing centres.

**Figure 9: Brent’s Hierarchy of Town Centres**

Major	District	Local
Kilburn Wembley	Burnt Oak Colindale/The Hyde Cricklewood Ealing Road Harlesden Kenton Kingsbury Neasden Preston Road Wembley Park Willesden Green	Church End Kensal Rise Queen’s Park Sudbury

(Wembley is identified as a Nationally Important Night Time Economy Centre, Kilburn, Cricklewood and Wembley Park are identified as Locally Important Night Time Economy Centres)

**Figure 10:** Location of Brent's Town Centres



**Question 39:** Do you agree with the hierarchy of town centres in Brent as set out Figure 9? Yes / No

**If No, how and why should the hierarchy be changed, e.g. district to major or district to local?**

**Question 40:** Which town centres could possibly be reduced in size/length to encourage other non-retail uses and by how much?

**Question 41:** Are there any policies required in addition to those in the draft London Plan and Brent's pub protection policy that could support the night time economy or a greater cultural offer within Brent's town centres?

### Diversity of offer and non-retail uses

- 2.89 The need for town centres to diversify is recognised and supported. Brent has primary shopping frontages within some of its town centres. Planning policy requires a minimum number of retail units; 65% or 50% if vacancy levels are over 10%. Planning permission for other uses will not be granted if this percentage will be/has been breached. Nevertheless, town centres have become places where people do not only want to shop but to dwell for longer. As part of this an increased food and drink, other leisure/entertainment and community offer is expected.
- 2.90 Due to the previous limited availability of planning controls, some centres have an over-concentration of non-retail uses such as shisha bars, takeaways and betting shops. This increase is more pronounced in wards with higher levels of deprivation, and affects the vitality of town centres as well as raising concerns around perceptions of place, public health and anti-social behaviour.

2.91 Policy DMP2 of Brent's adopted Development Management Policies aims to maintain and encourage diversity on the high street, while policy DMP3 aims to prevent the proliferation of non-retail uses such as takeaways, pay day loan shops, betting shops and shisha cafes.

**Question 42: In relation to minimum amounts of retail premises within primary shopping frontage should Brent:**

- **Maintain current policies;**
- **Relax the thresholds to allow more variety of uses; or**
- **Remove all thresholds and let the market decide the mix of uses?**

**Please explain your choice and if b) what percentage you consider to be appropriate.**

**Access and accessibility**

2.92 Responses to initial consultation on the Local Plan indicated a need to improve public transport and pedestrian access to Brent's town centres, especially where they are affected by physical barriers such as the North Circular in Neasden. Access to town centres is further reduced by perceived road congestion and overcrowded buses. Improving walking and cycling routes would also reduce the high levels of physical inactivity identified in Brent and contribute towards improved health as set out in the Brent Clinical Commissioning Group (CCG)'s Sustainability and Transformation Plan.

2.93 Accessibility also extends to online access. Businesses in town centres perform better if they are accessible online and visitors can access free WIFI while in the centres. This also encourages longer dwell time in Brent's town centres.

**Question 43: How can the Local Plan do more to support the borough and town centres in relation to accessibility and Information Technology needs, e.g. ensuring sufficient WIFI infrastructure?**





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# Transport

## Road Congestion

- 2.94 Road congestion is experienced in parts of the borough during peak times. Areas of particular pressure include the North Circular which intersects the borough, and the road network around Wembley on events days. Road congestion is a major contributor to poor air quality. Delays on the road network can also have an economic impact for local businesses, and a social impact for residents. Increased population will place further pressure on the road network.
- 2.95 The draft London Plan seeks to ensure that London moves towards a target of ensuring that by 2041 80% of all journeys undertaken are by walking, cycling and public transport. This undoubtedly is an ambitious target, particularly so in Brent which currently has extensive areas that do not have high public transport accessibility levels. As such, particularly in areas to the north of the borough, it has comparatively high car dependency levels.
- 2.96 Nevertheless, currently Brent is seeking to maximise travel other than by the private car. It will do as much as possible to try to achieve the London Plan target. The **Brent Long Term Transport Strategy 2015-35** seeks to promote sustainable travel, such as public transport, walking, and cycling, over the use of private vehicles. Much of the borough benefits from high levels of public transport accessibility. Brent is served by the Jubilee, Metropolitan, Bakerloo and Piccadilly line and the London Overground. In addition, the Chiltern Line runs between Marylebone and South Buckinghamshire via Wembley Stadium station.
- 2.97 Whilst the underground and overground provide good radial links to Central London, orbital links are served by the bus network and therefore less reliable due to road congestion. Future transport improvements include a Thameslink station at Brent Cross, in Barnet to the east of Cricklewood. From the station it will be possible to travel to Kings Cross in less than 15 minutes. In addition, a new High Speed 2 (HS2) and Elizabeth Line (formerly known as Crossrail) Station will be located in Old Oak, to the south of Harlesden. HS2 will link London Euston to Birmingham, whilst the Elizabeth Line connects Reading to Shenfield via Central London. Opportunities to improve Willesden Junction Station, including step free access and reinstating the West Coast Main Line platforms there, are also being explored. There is also the potential of an Elizabeth Line station being

established at Kensal gasworks in Kensington and Chelsea, close to the borough boundary with Brent.

- 2.98 The proposed West London Orbital rail link is an opportunity to improve east west links and connect the borough to HS2 and Thameslink. The link would make use of the existing Dudding Hill freight line to create an overground passenger line connecting Old Oak Common to Brent Cross Thameslink via Harlesden, Church End, Neasden and Gladstone Park in approximately 15 minutes. The council is working with partners including Transport for London, Old Oak and Park Royal Development Corporation and West London Alliance to secure benefits for Brent and also identify future opportunities to improve the transport network.
- 2.99 In addition to seeking improvements to public transport, the council has sought to reduce private vehicle use by setting lower car parking standards in areas with good public transport, and promoting car clubs. New technologies, particularly driverless cars, have the potential to further improve road efficiency and reduce private vehicle ownership and therefore the need for car parking. Public trials of driverless cars are already underway. Roll out across the country will be dependent on 5G data networks and rapid charging facilities. Smart Travel planning is also a tool which could be used to help people walk, cycle and use public transport more often. Figure 11 summarises how the Local Plan could help deliver the Brent Long Term Transport Strategy.



**Figure 11:** How the Local Plan could help deliver the Brent Long Term Transport Strategy

Objective	Category	How the Local Plan can contribute
<b>Increase the uptake of sustainable modes, in particular active modes</b>	<b>Cycling</b>	<ul style="list-style-type: none"> <li>• Support the development of a network of cycle routes, catering for a variety of abilities and connecting key locations.</li> <li>• Ensure developments incorporate cycling facilities and meet Transport for London's and WestTrans cycle parking design standards.</li> <li>• Increase the number of short and secure long-stay cycle parking facilities</li> </ul>
	<b>Walking</b>	<ul style="list-style-type: none"> <li>• Ensure developments promote active travel by creating safe and attractive walking environment</li> <li>• Ensure developments consider the needs of all users, including disability groups and the need for dementia friendly environments</li> </ul>
	<b>Public transport</b>	<ul style="list-style-type: none"> <li>• Focus development in areas with high levels of public transport access</li> <li>• Incorporate opportunities to improve orbital links</li> </ul>
	<b>Travel planning</b>	<ul style="list-style-type: none"> <li>• Major developments to be accompanied by travel plans</li> </ul>
<b>Reduce conventional vehicular trips on the network, particularly at peak times</b>	<b>Freight</b>	<ul style="list-style-type: none"> <li>• Promote the use of the Grand Union Canal and rail for freight</li> <li>• Promote delivery hubs and consolidation centres in accessible locations</li> <li>• Support home-working</li> <li>• Major developments to have Construction Logistic Plans for the construction phase and Delivery and Service Plans for when brought into use</li> </ul>
	<b>Car clubs</b>	<ul style="list-style-type: none"> <li>• Promote car clubs in major developments, in particular electric vehicle car clubs</li> </ul>
	<b>Car parking</b>	<ul style="list-style-type: none"> <li>• Lower parking standards in areas with high public transport accessibility levels</li> <li>• Where parking management controls are in place as well as high public transport accessibility levels consider car free developments</li> </ul>
<b>Support Growth Areas and Town Centres to enable acceptable development</b>	<b>Travel planning</b>	<ul style="list-style-type: none"> <li>• Major developments to be accompanied by travel plans</li> <li>• Explore opportunities to reduce the number of servicing vehicles during peak hours in town centres through micro-distribution/handling centres</li> </ul>
<b>Reduce accidents on Brent's Roads</b>	<b>All accidents</b>	<ul style="list-style-type: none"> <li>• Ensure streets designed to healthy streets standards, which promote walking and cycling</li> <li>• Support the delivery of Cycling Quietways</li> </ul>
<b>Reduce the exposure of Brent residents to particulate matter and NO2 generated by the transport network</b>	<b>Travel planning</b>	<ul style="list-style-type: none"> <li>• Electric Vehicle charging points within development and across borough that are accessible for all residents (existing and new) to use</li> <li>• Support intelligent transport systems</li> </ul>

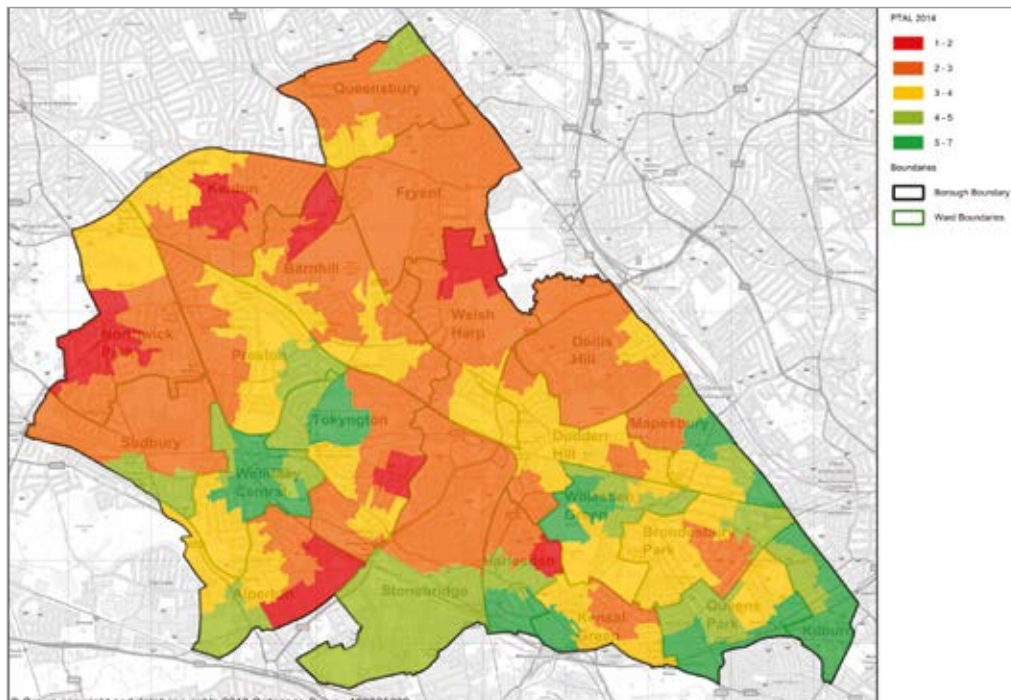
**Question 44: Are there any other ways the council could reduce private vehicle use, for example through new and emerging technologies?**

**Question 45: Do you support the proposal for a West London Orbital rail link? Yes/No**

**Please explain why and what the Plan should do to support the proposal.**

**Question 46: Are there any other specific improvements to public transport improvements the council should seek? For example, step-free access to particular stations.**

**Figure 12: PTAL levels within the borough**



## Freight

- 2.100 Brent has a number of industrial estates that both rely on and generate freight movements. Freight and deliveries to private residencies and construction traffic have a significant impact on the network in terms of congestion, road safety and air quality.
- 2.101 A retiming delivery strategy has been trialled by businesses in Wembley to reduce congestion at peak times. This is something which could be considered for future developments. For business deliveries and construction an option may be to promote consolidation centres for one point of collection, or the use of rail or the Grand Union Canal for freight. Alternative fuel networks, such as Hydrogen/ rapid charger fuelling hubs, could also enable cleaner commercial vehicles on the road network in the future. Appropriate space/facilities will be required to enable these technologies to be used. This could be supported/required in new development, but also facilitated in existing areas through planning policy.
- 2.102 On a more localised scale, delivery hubs, such as click and collect stations, could be promoted in town centres or at stations. This would allow collection of deliveries from one accessible location rather than multiple deliveries to different locations. Companies such as Next indicate that over 50% of its on-line customers still prefer to pick up their purchases from its stores, so there is an opportunity to allow combined trips for customers and maintain town centre vitality and viability. Consideration needs to be given to the impacts of out of hours operation such as deliver and collections and how this can best be accommodated to not adversely impact on neighbours. Companies such as Amazon have been trialling delivery by drone, and in the future this may be a delivery option which takes pressure off the road network.

**Question 47: What policies should the Local Plan include to minimise the impact of freight movements or goods delivery in Brent? How should alternative fuel technologies be supported that can also assist in facilitating this?**



2.104 One of London's metropolitan walking routes passes through Brent. The Capital Ring, a 78 mile walking route which encircles London, connects South Kenton to Welsh Harp. Walking accounted for 27% modal share of all journeys in the borough in 2013/14-2015/16. The council has a target to increase this to 30% by 2021/22. Quality of public realm and safety have been cited as barriers both to walking and cycling. The creation of safe and attractive walking and cycling routes linking key destinations is one method that could be used to take pressure off the road network.

## Active Travel

2.103 Active travel such as cycling and walking take pressure off the road network. It also has health benefits. Brent has a number of established cycle routes. These include two radial cycle routes and one orbital route forming part of the 900km London Cycle Network Plus (LCN+). Transport for London is also implementing a Quietway programme connecting Regent's Park and Gladstone Park. They are also developing a route between Wembley Park and Harrow Weald. Cycling take-up is still relatively low and varies across the borough. In the borough's south, cycling claims 2-5% modal share of journeys, whereas in the north this falls to 0-1%. In public consultation, road safety has been identified as a barrier to cycling.

**Figure 13:** Existing cycle and walking routes and proposed improvements



**Question 48:** Please identify any specific walking and cycling routes that could be improved and how.



# Open Space and Biodiversity

- 2.105 There are numerous benefits associated with open space, which include:
- Capturing carbon
  - Cooling the urban environment
  - Helping to shape the cultural identity of an area and provide a sense of place for local communities.
  - Improving physical and mental health by encouraging more people to walk, cycle, play sport, or enjoy a green and natural environment
  - Increasing desirability/positively impacting on property prices of an area
  - Providing a home for the borough's biodiversity.
- 2.106 The NPPF highlights the contribution that open spaces can make to the community. It places a requirement on local planning authorities to base policies on robust and up-to-date assessments of the need for open space, sports and recreation facilities. It also requires the identification of opportunities for new provision.

## Open Space Deficiency and Increasing pressure

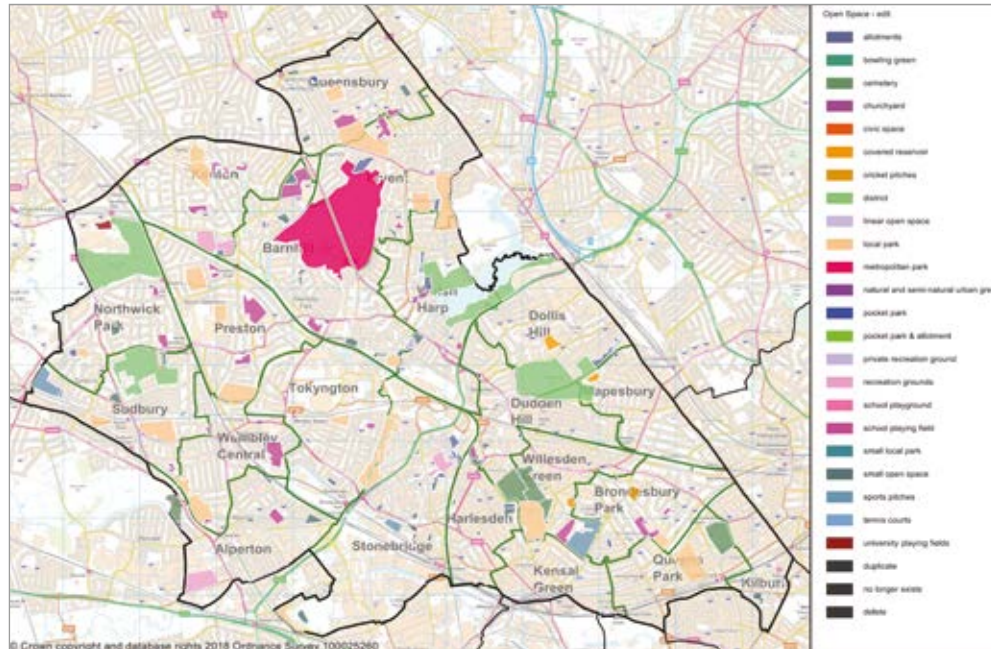
- 2.107 The borough's open spaces cover 644 hectares. This is equivalent to 14.9% of the borough's total land area. The type of open spaces within the borough are identified in Figure 14, with their location portrayed in Figure 15.



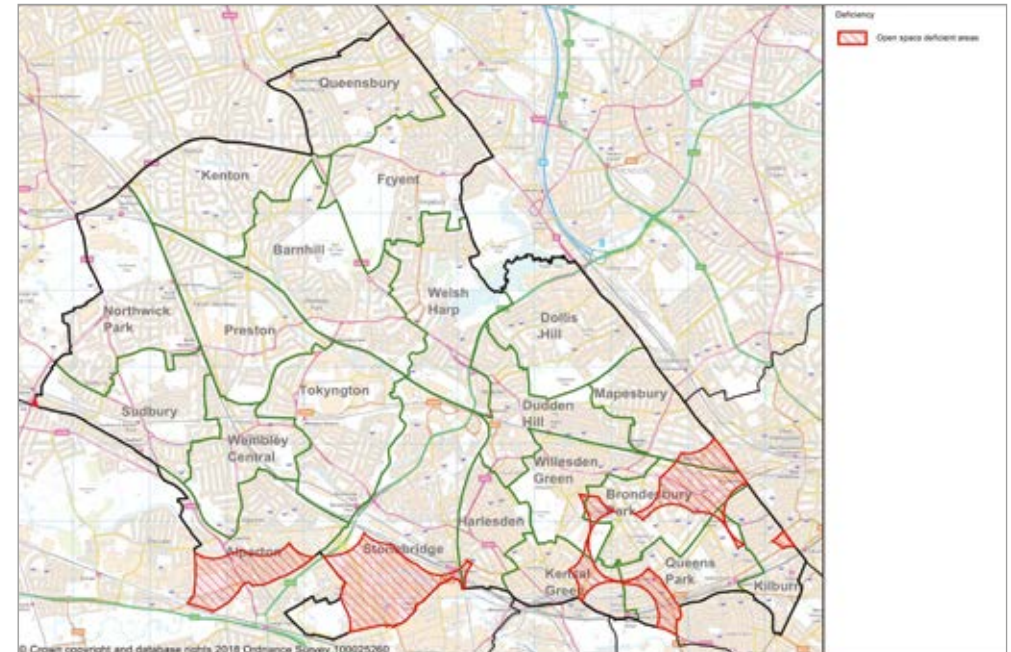
**Figure 14:** Open Space Types within Brent

Type of Open Space	Description	Number of open spaces
<b>Metropolitan Park</b>	Large areas of open space that provide a similar range of benefits to Regional Parks (i.e. recreational, ecological, landscape, cultural or green infrastructure benefits), are readily accessible by public transport and are managed to meet best practice quality standards.	1
<b>District Park</b>	Large areas of open space that provide a landscape setting with a variety natural features and providing a wide range of activities, including outdoor sports facilities and playing fields children's play for different age groups and informal recreation pursuits.	5
<b>Local Parks and Open Spaces</b>	Providing for court games, children's play, sitting out areas and nature conservation areas.	22
<b>Small Open Spaces</b>	Gardens, sitting out areas, children's play spaces or other areas of specialist nature, including nature conservation areas.	27
<b>Pocket Parks</b>	Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment.	32
<b>Allotments</b>	A plot of land, usually about 250 square metres in size, which has been made available to be cultivated by the occupier for the production of fruit and vegetables for consumption by the occupier and their family.	22 sites
<b>Linear Open Spaces</b>	Open spaces and towpaths alongside the Thames, canals and other waterways; paths; disused railways; nature conservation areas; and other routes that provide opportunities for informal recreation.	10
<b>Civic Spaces</b>	Provides a setting for civic buildings, such as town halls, and opportunities for open air markets, demonstrations and civic events.	3
<b>Cemeteries and Churchyards</b>	These are areas for quiet contemplation and burial of the dead. This type of open space also contributes to the promotion wildlife conservation and biodiversity.	5 cemeteries 3 churchyards
<b>Natural and Semi-natural green spaces</b>	Places where humans control and activities are not intensive so a feeling of naturalness is allowed to predominate. This type of space can include woodlands, local wildlife sites, railway embankments, road verges and derelict land.	62 SINCS 3 'other' natural and semi-natural green spaces
<b>Sports Pitches</b>	A delineated area of land which, together with any run off areas is of 0.2 hectares or more, and which is used for association football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, American football, Australian football, Gaelic football, shinty, hurling, polo or cycle polo.	8 full-sized AGPs 6 Rugby Pitches 78 football pitches 21 cricket squares
<b>University Playing Fields</b>	A large area of ground, which is owned by a university, where sports are played.	1

**Figure 15: Open Spaces within Brent**



**Figure 16: Open Space Deficient Areas**

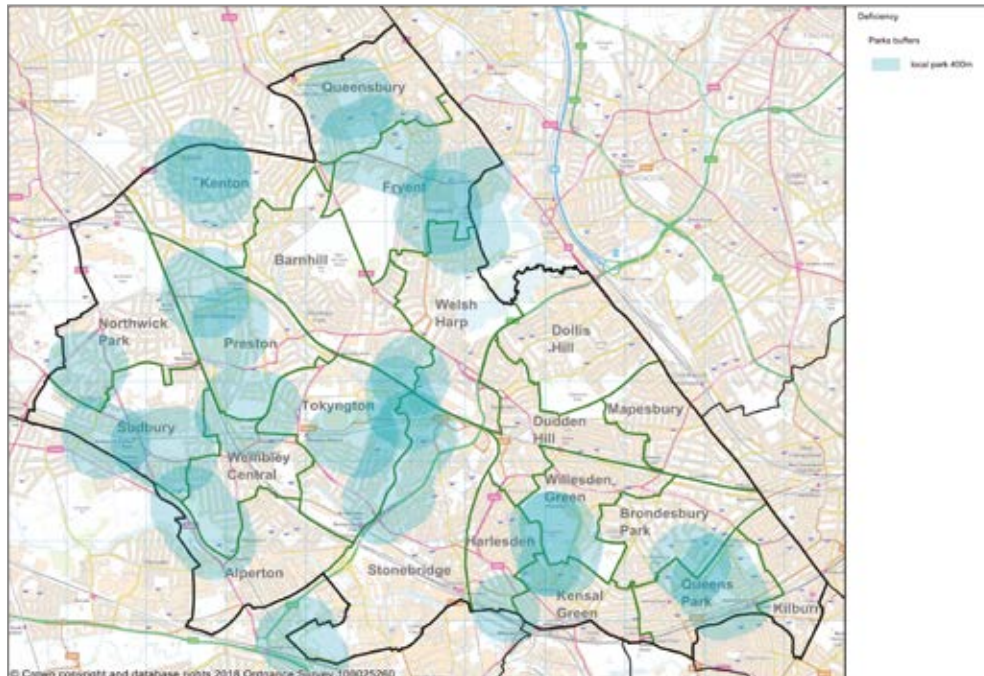


2.108 The current London Plan<sup>18</sup> provides a benchmark for all London boroughs to assess their own provision for the different categories of open space found throughout London. Taking account of recommended proximity to open space types, it is evident that areas within the south of the borough are open space deficient (Figure 16). It might be that although they are located close to one open space, they do not have sufficient levels of access to a variety of open spaces, which is why they are identified as being deficient.

2.109 Furthermore, there is a significant spatial variation in the distribution of open spaces within the borough. This means that there are particular types of open space deficiency at ward level. As shown in Figure 17. Mapesbury, Dollis Hill, Dudden Hill and a large proportion of both Barnhill and Stonebridge are deficient in local parks

<sup>18</sup> London Plan 2016 (Incorporating Minor and Further Alterations) Table 7.2.

**Figure 17: Brent's Local Parks – Areas of Deficiency**



**Question 49: Do you agree that the current open space designations are correctly identified in Figure 15? Yes/ No**

**Are there any additional areas of open space which should be identified which are not currently?**

**Question 50: Are there any parts of designated open space that do not properly serve open space functions and could be improved or even re-designated for other uses?**

2.110 New homes are expected to provide on-site amenity space in the form of gardens, or more recently due to increases in housing density, balconies and communal gardens. Outside of this type of provision, the anticipated levels of population and housing growth will promote increased use of the borough's existing open space network. There is very limited scope to extend the borough's existing open spaces as they are usually bounded by development. Therefore, the main opportunity for creating new open space is on new development sites.

2.111 In relation to the provision of public open space, the council's resources available to invest in the maintenance and upkeep of these areas are diminishing. This trend is likely to continue. In areas such as Wembley Park, the majority of new public open space is now owned and maintained by the developer of the area. This could be a model for future provision in association with larger developments where such space is provided.

**Question 51: Should the council require all new housing developments over a certain size to provide public open space, rather than just private amenity space? Yes/ No**

**Please explain your answer.**

### Quality of Open Spaces

2.112 The higher the quality of the open space, the more likely it will be used. Quality can impact on a number of issues such as prevalence of anti-social behaviour, quality of life, providing a sense of community and reducing alienation and loneliness. As part of the forthcoming open space, sport and recreation study, a qualitative assessment of the borough's open spaces has been undertaken. Initial findings show quality varies. Some have also been identified as having problems with anti-social behaviour. It is a council priority to protect existing open spaces. In some cases, poor quality open spaces might be improved by their reconfiguration. Nevertheless, the attributes of some may mean that they have such fundamental problems in terms of location, or layout that they will never be fit for purpose.

**Question 52: Where an existing open space has no reasonable prospect of being fit for purpose should the council consider its redevelopment to help fund improvements to other open spaces? Yes / No**

**Please explain your answer.**



## Maintenance of Open Spaces

2.113 As identified by Project for Public Spaces<sup>19</sup>, good maintenance plays vital role in park safety. The presence of graffiti, poorly maintained paths and litter contributes to the perception of lack of safety. As identified, the management and continued maintenance of open spaces is a long-term issue for the council. It will require flexibility to respond to a range of issues such as climate change, local needs, and biodiversity and community safety. The significant amount of development that is to come forward during the Plan period is likely to make the maintenance and management of the borough's open spaces more challenging. Therefore, there is a need to consider new approaches. This could include the local community taking up a more active role in the maintenance and management of their local park. It could also include, subject to sufficient safeguards to ensure long term accessibility and quality, the provision of public open space, owned and maintained by organisations other than the council.

**Question 53: In relation to new development, what management approaches can the council adopt for the provision and maintenance of new parks and open spaces?**

## Sport

2.114 Sport has a key role in contributing to the health and wellbeing of communities. Sport facilities form an important part of the borough's open space and cultural offer. It is an area which has seen investment in recent years with new facilities being installed (e.g. installation of 19 outdoor gyms and 18 Multi Use Game Areas (MUGAs) at various locations across the borough) and improvements made to existing facilities.

2.115 Outdoor sport provision has been incorporated into the borough's open space standard. With regards to indoor facilities, a number of local quantity standards were set out in the Sport and Active Recreation Facilities Strategy 2008-2021. This assessment is now somewhat dated and a more updated assessment is required. It is anticipated that there will be shortfalls within the provision of a number of indoor sports facilities. If there are no additional facilities provided, shortfalls are likely to increase with the

expected population growth during the plan period. It is possible that some of this shortfall could be met through the community use of school sports facilities rather than creating new ones if agreements were reached with the responsible bodies.

2.116 Data from Sport England Active Lives Survey (mid-May 2016 to mid-May 2017) shows that 66.9% of people aged 16 or over achieve 30 minutes or more activity per week. This is lower than the average for England; and relatively high levels of people who are inactive. The survey also highlighted there is a gap between men's and women's participation rates.

**Question 54: What types of sports facilities should the Local Plan prioritise?**

**Question 55: What measures can the Local Plan take to improve sports and recreation participation rates among residents?**

## Protecting and Enhancing Biodiversity

2.117 The borough has 62 Sites of Importance for Nature Conservation (SINCs). The 2014 **Review of SINCs** in Brent found that the quality of habitats in the borough varied from poor with limited species to species-rich. Some areas of woodland, such as those found at Coronation Gardens, although planted had become naturalised through cessation of management and offer a good, diverse habitat.

2.118 Furthermore, as identified in '**At Home with Nature – Encouraging Biodiversity in New Housing Development**',<sup>20</sup> there is a risk that increasing housing density will see biodiversity being squeezed or reduced. Across London there has been a decrease in both flora and fauna. This means the long-term benefits of biodiversity (such as mitigating against flooding and the urban heat island affect) is not being realised.

**Question 56: To what extent and how should development contribute to increased biodiversity?**

<sup>19</sup> <https://www.pps.org/>

<sup>20</sup> At Home with Nature: Encouraging Biodiversity in New Developments GLA Housing Committee January 2017



## Sustainability

### Environmental Protection

- 2.119 As indicated in Paragraph 1.15 the Local Plan must contribute to the achievement of sustainable development. This means balancing economic and social progress without compromising the environment for current and future generations. Parts of the borough experience poor air, poor water quality and ground contamination. A key challenge is securing development which helps improve environmental quality, and mitigates the impacts of climate change.
- 2.120 Air quality in Brent has been improving, however action is needed to meet targets for reducing Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub>). Large parts of Brent have been designated as Air Quality Management Areas (AQMAs). This includes the entire area south of the North Circular Road and the major road corridors north of it. This indicates areas where national pollution objectives are breached. In addition, four Air Quality Action Areas or hotspots have been identified: Neasden town centre, Church End, and Kilburn Regeneration Areas, and Wembley and Tokyngton. In Brent, the largest contributors to poor air quality are local energy generation, construction and road transport.
- 2.121 The UK is part of the Water Framework Directive which commits us to achieving 'good status' for all water bodies. In the Brent Riverside catchment the Grand Union Canal, Lower River Brent and Wealdstone Brook are not achieving good status. This is due primarily to pollution and physical modification from urban development, transport and the water industry. The council forms part of the Brent River Catchment Partnership. This is taking forward projects in the Brent River Corridor to improve water quality and reduce the risk of flooding. Projects include naturalisation of rivers, removing invasive species, reducing pollution and improving access for recreation.
- 2.122 Brent has a significant amount of industrial land or former industrial land that could be contaminated. Contaminated land presents a potential hazard to people, ecological systems, animals and buildings. Through development there is an opportunity to secure the remediation of contaminated land.

## Climate Change

2.123 Brent's climate change strategy identifies a number of possible future risks for Brent as a result of climate change. Higher than average temperatures are likely to intensify the urban heat island effect. This is most intense at night, as buildings and roads absorb more solar radiation than green space and vegetation. Increased temperatures could cause discomfort and lead to severe heat stress; the borough's open spaces may become more difficult to manage as a result of droughts becoming more frequent, and areas close to the North Circular Road (A406), where air quality is currently the worst, will suffer during hot weather because air quality deteriorates rapidly as air temperatures rise.

2.124 Climate change is also likely to increase the risk and extent of flooding in Brent. Potential areas of fluvial flood risk in Brent include Welsh Harp, River Brent and Wealdstone Brook. Localised surface water flooding is an issue, particularly at times of prolonged periods of intense rainfall.

2.125 The London Plan sets out extensive policies on increasing environmental sustainability which apply in Brent. These seek to reduce carbon dioxide emissions and ensure developments are designed to be resilient to climate change. In summary, London Plan policies include:

- Reducing exposure to poor air quality
- Minimising carbon dioxide emissions by following the energy hierarchy of using less energy, using clean energy and using renewable energy. Major developments are to be net zero-carbon
- Promoting decentralised energy network opportunities, including connecting to or creating new Combined Heat and Power systems
- Avoiding internal overheating through the design of buildings and natural ventilation
- Minimising pollution, including noise, air and to water
- Minimise the generation of waste and maximising reuse or recycling
- Minimise water consumption, including through the use of sustainable urban drainage systems

- Avoiding impacts from natural hazards, including flooding
- Securing sustainable procurement of materials, using local supplies where feasible
- Promoting and protecting biodiversity and green infrastructure, including tree planting, green walls and green roofs
- Supporting the remediation of contaminated land

2.126 Brent has commissioned a joint West London Strategic Flood Risk Assessment which will identify those areas most at risk of fluvial (river/watercourse and reservoir breach) flooding and surface water flooding. This will inform whether sites are considered appropriate for development. It will also identify measures to ensure new development does not cause unacceptable flood risk to its occupants or elsewhere and ideally reduces it.

2.127 There is a statutory requirement for Local Plans to set out how climate change will be reduced and its effects mitigated. Currently Brent relies on the extensive and detailed London Plan policies to address environmental protection and sustainability/adaption to climate change. Brent does not need to repeat higher tier plan policy, but as is currently the case in the development management policies plan, it can provide reference to the need for applicants to consider these policies. Brent is probably likely to update its Local Plan policy on flooding and drainage to take account of locally specific policy recommendations related to the Strategic Flood Risk Assessment.

**Question 57: Should Brent have any locally specific policies to promote environmental protection and sustainability/ adaption to climate change? Yes/No**

**If yes, what should be included beyond what is already in the London Plan?**





## Infrastructure

2.128 To ensure that the planned growth in Brent benefits both existing and new residents, businesses and visitors it will need to be supported by adequate infrastructure. This covers a range of issues, such as social infrastructure, transportation and utilities.

Social infrastructure refers to a range of services and facilities that contribute to a good quality of life. It plays a vital role in supporting Brent's diverse community; reducing inequality and helping to promote social inclusion and cultural wellbeing. It can include the following:

- Educational facilities including early years education, primary education, secondary education, further education and adult learning;
- Health services including acute, primary and secondary health;
- Sports and leisure facilities including swimming pools, sports halls and outdoor sports spaces;

- Libraries;
- Places of worship;
- Theatres and galleries;
- Community and cultural space, meeting rooms, halls, galleries;
- Fire stations, policing and other criminal justice or community safety facilities;
- Waste and recycling;
- Burial grounds/crematoria; and
- Public houses.

2.129 Brent is one of the most diverse boroughs in London, and this diversity has contributed to a rich cultural history. The existing cultural offer ranges from national attractions such as National Stadium, Wembley Arena, Neasden Temple and the Tricycle Theatre in Kilburn to the creative businesses and grassroots organisations in the borough. The council is seeking to build on this offer, and is bidding for Brent to be borough of culture 2020.

2.130 There are also often a lot of 'softer' social care elements related to support the vulnerable or those potentially at risk to themselves or others. Movement is a critical part of the social, economic and environmental success of a place. As set out in the transportation section there are a range of measures anticipated to be required to improve efficiency and shift towards travelling by walking, cycling and public transport. This will require the associated improvements to transport infrastructure.

2.131 In addition the provision of utilities such as water, gas, electricity and telecommunications infrastructure to satisfactorily serve development will be required to ensure its successful delivery.

2.132 Brent's Local Plan will play an important role in safeguarding existing infrastructure. It will also ensure that new development seeks to provide adequate new infrastructure to meet the needs of a growing population. This will be either by delivering facilities onsite or adjacent to it or through payments made to the council to ensure facilities are provided in another location within or sometimes outside the borough. In other cases it might be through policies that identify specific sites for infrastructure or facilitate its delivery subject to it meeting criteria that make its provision acceptable in planning terms.

- 2.133 Infrastructure is provided and supported by a multiplicity of agencies including: the council, other public sector agencies such as the NHS, charities/voluntary agencies such as Mencap, privatised providers such as Thames Water and market providers, e.g. healthcare or landowners/estates such as Quintain.

## Challenges for the Public Sector

- 2.134 Since the recession of the late noughties there have been significant public sector funding cuts. This has affected many aspects related to the provision of social infrastructure and services. In the majority of cases it has meant services cannot be provided to communities to previous extents. There is no obvious end to the downward trend; certainly within local government, further reductions to expenditure are expected.
- 2.135 This has implications for existing and future patterns of provision, service delivery models and consideration of the long-term sustainability of capital expenditure on facilities. There will be pressure for many social infrastructure providers to consolidate existing facilities onto fewer sites to gain savings through improved economies of scale. This might well be inconsistent with the desire of local communities to be able to access facilities at a very local level.
- 2.136 Whereas the council might previously have taken on or 'adopted' some infrastructure to secure its long-term provision, this can no longer be automatically assumed. The council is unlikely to take on facilities that place an additional burden on its budgets. As such there is a need to look at some social infrastructure facilities in a smarter way. This for example could include greater flexibility to accommodate a wider range of uses, consolidation/co-location to reduce overheads. The council is working with other public sector bodies including through the One Public Estate initiative to identify how such practises might be taken forward in Brent. There might also be the potential for commercially successful tenants to subsidise space that might be used for community purposes, e.g. a day time nursery can occupy a space in the day, but at other times it is available for a variety of community events.

## Identifying Infrastructure Requirements

- 2.137 Most infrastructure providers have standards/ methodology to estimate needs which allows for successful future planning. For example for primary health care this would include an assumption on number of patients per GP, minimum GP practice sizes, accessibility standards and quality of service. Providing Brent CCG with information on estimated population related to new development will allow the identification of whether existing facilities are acceptable, will require potential expansion/adaptation, or whether a new GP practice will be required.
- 2.138 The council is working closely with service providers to update the evidence of needs and plan for infrastructure provision. The dialogue with many providers is and has been on-going. This dialogue for instance has told us, for example, there are sufficient primary school places to meet needs in the short to medium term, but there will be significant pressure and a need to build two new secondary schools by 2023/24 academic year. There are currently no sites identified for these, although spatially there is a need for one in each of the north and south of the borough.
- 2.139 Other feedback is that at a strategic level gas, water and electricity provision is unlikely to be an inhibitor to growth, but parts of the networks will need new infrastructure to augment supply. In the case of water, sufficient sewerage capacity is required to deal with waste water currently polluting streams and rivers at times of peak rainfall.
- 2.140 The majority of funding for infrastructure paid to the council from new development is now from the Community Infrastructure Levy. This is a standard charge related to the majority of new floorspace developed. This is currently generating significant sums (over £10 million per year). There will however also be occasions where less strategic impacts of development will need to be mitigated. This will be achieved through, subject to statutory tests being achieved, the use of Section 106 planning obligation

- 2.141 The Plan will need to contain policies to ensure the timely provision of infrastructure and appropriate mitigation of effects that would otherwise make a development unacceptable through the use of conditions or Section 106 obligations. These could include on site standards, for example, if a development is over a certain size it will be expected to provide on-site facilities, e.g. a community hall. If there is sufficient clarity from infrastructure providers on specific locational requirements, the Plan could specifically allocate sites for infrastructure either on its own or part of a wider development. In addition where the location of potential infrastructure is not yet known, the Plan could contain policies to allow for it to be given planning permission subject specific criteria being met.

### Infrastructure Delivery Plan

- 2.142 The Local Plan through the NPPF is expected to have an Infrastructure Delivery Plan. This highlights key pieces of infrastructure required across the Plan's lifetime. It is meant to identify its likely timing of delivery, who will deliver it, its cost, funding sources and potential gaps in funding. It should also identify whether its provision is critical to Local Plan delivery assumptions and if not implemented could be a 'showstopper', e.g. does not allow a significant site for housing to come forward in the timescales expected.

**Question 58: What infrastructure is needed in Brent over the plan period, and are there any particular sites that should be identified for where should it be provided?**

**Question 59: Which infrastructure has the potential to be co-located within larger multi-purpose buildings which can adapt to various uses?**





## Integrated Impact Assessment

2.143 Section 1 provides some background on the Draft Local Plan Integrated Impact Assessment (IIA) Scoping Report which is also subject to consultation at this Issues and Options stage.

**Question 60: In relation to the Draft Local Plan IIA Scoping Report Table 4 are there other Policies, Plans, Programmes, Strategies and initiatives (PPPSIs) which should be considered for the purposes of producing the Local Plan?**

**Question 61: Are there any PPPSIs identified within the IIA Scoping Report that you consider to be irrelevant to the emerging Local Plan?**

**Question 62: Do you have any comments on the accuracy, scope and coverage of the baseline data included within the IIA Scoping Report (as set out in its Appendix 2) or know of any further data or indicators that might prove useful information? If so, provide details.**

**Question 63: Do you have any comments on the IIA sustainability issues and problems identified for the borough (Table 5) or know of any further issues and problems that should be included?**

**Question 64: Do you have any comments on the IIA objectives or know of any further IIA objectives that should be considered?**

**Question 65: Are there any additional potential indicators and/or targets for the objectives that have not been identified in Table 6?**

**Question 66: Do you have any comments on the assessment framework?**

**Question 67: Do you have any comments on the methodology or conclusions of the Habitats Regulations Assessment (HRA) Screening Report (Appendix 4 of the IIA Scoping Report)?**

2.144 The existing Local Plan was subject to Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) as has the London Plan. As such it is likely that a high level of consideration has been given to the extent to which Brent's existing policies seek to further economic, social and environmental betterment. Health and equalities matters would have been at the very least implicit within the matters and objectives of the SEA/SA.

The specific consideration of health and equalities within the IIA should mean that greater emphasis is placed on the plan considering and therefore addressing these matters.

## IIA Health Impacts

2.145 Almost all aspects of the Plan either directly or indirectly have some impact on the health outcomes of the population. The Plan can address issues that specifically relate to provision of healthcare, e.g. policies to identify specific sites for healthcare facilities, or provide for their existing facilities to change to meet needs. More recently Brent's has sought to control things such as the number and location of takeaways (to reduce obesity) or betting shops (mental health) which unfettered could otherwise adversely affect the population's health. It also seeks to ensure that more obviously healthy lifestyles can be facilitated, e.g. preserving or enhancing the provision of sports pitches, leisure centres, gyms, parks and open spaces. Less obviously, addressing factors such as providing enough homes and suitable jobs can reduce incidences or outcomes of deprivation which might have adverse health impacts, e.g. mental health related to stress or depression.

**Question 68: The Local Plan addresses a wide variety of issues that directly and indirectly impact on the health of the population. Are there any areas in which it is currently deficient or could be strengthened to ensure that future development better serves the health needs of Brent's residents and visitors?**

## IIA Equality Impacts

2.146 The council has a statutory general equality duty through the Equality Act 2010 to have due regard to eliminating unlawful discrimination, harassment and victimisation and other prohibited conduct and advance equality of opportunity and good relations between people who share a protected characteristic and those who do not. The protected characteristics are: age (including children and young people), disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

2.147 In terms of the Brent population headlines in relation to the protected characteristics, it has:

- a relatively young profile, e.g. the median age is 32 compared to the national median of 39;
- a balanced male/female split (very close to 50% in each)
- 14.5% affected by a health issue that limits day to day activities compared to 17.9% nationally
- 63.7% from black and minority ethnic groups compared to the national average of 14% nationally
- 41% Christian, 19% Muslim and 18% Hindu compared to 59%, 5% and 1.5% nationally, and
- a conception rate of 99 per 1000 compared to 90 per 1000 nationally
- no known differences between local and national in relation to gender reassignment or sexual orientation.

## Local Plan Impacts

2.148 As with health, the contents of the Local Plan either directly or indirectly have some impact on those with protected characteristics within the population. The Plan does specifically relate to disability issues for example by ensuring that 10% of new homes are built to be wheelchair accessible, whilst the remainder are built to a standard that makes them more easily adaptable to changes in circumstances. In relation to dwelling sizes, it has policies that seek a minimum number of 3 bed or more properties, which will assist in meeting housing needs for some protected groups, e.g. ethnic minorities (more prevalence of larger family households) or maternity (to provide greater likelihood of accommodating children). Some policies such as supporting or protecting new community facilities may for instance assist ethnic or faith groups in developing suitable religious facilities.

**Question 69: Given the very different population characteristics, particularly around its younger age, ethnicity, religion and maternity, are there any areas in which the Plan could be strengthened to ensure that future development better serves the needs of Brent's residents and visitors with protected characteristics?**

# APPENDIX A – List of Brent Local Plan Policies

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# How do I respond to this consultation document?

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The council will be undertaking the Local Plan consultation in accordance with its **Statement of Community Involvement** adopted in July 2017. The Local Plan review consultation will run for a six week period starting on **Thursday 8 February 2018**. The deadline for responses is **5pm on Thursday 22 March 2018**.

We would encourage you to provide your comments on the council's consultation website by completing the consultation questionnaire and interactive map online at **[www.brent.gov.uk/shapebrent](http://www.brent.gov.uk/shapebrent)**. This is the quickest way of replying. Alternatively you can email us or send us your comments by post by using the addresses below.

**Email: [planningstrategy@brent.gov.uk](mailto:planningstrategy@brent.gov.uk)**  
**Post: Paul Lewin, Team Leader Planning Policy,**  
**Brent Council, Engineers' Way, Wembley, HA9 0FJ**

# Core Strategy

Policy	Relevant	Change	Not needed
<b>Core Strategy</b>			
CP 1 Spatial Development Strategy			
CP 2 Population and Housing Growth			
CP 3 Commercial Regeneration			
CP 4 North-West London Co-ordination Corridor			
CP 5 Placemaking			
CP 6 Design & Density in Place Shaping			
CP 7 Wembley Growth Area			
CP 8 Alperton Growth Area			
CP 9 South Kilburn Growth Area			
CP 10 Church End Growth Area			
CP 11 Burnt Oak/Colindale Growth Area			
CP 12 Park Royal			
CP 13 North Circular Road Regeneration Area			
CP 14 Public Transport Improvements			
CP 15 Infrastructure to Support Development			
CP 16 Town Centres and the Sequential Approach to Development			
CP 17 Protecting and Enhancing the Suburban Character of Brent			
CP 18 Protection and Enhancement of Open Space, Sports and Biodiversity			
CP 19 Brent Strategic Climate Change Mitigation and Adaptation Measures			
CP 20 Strategic Industrial Locations and Locally Significant Industrial Sites			
CP 21 A Balanced Housing Stock			
CP 22 Sites For Nomadic Peoples			



## Site Allocations

Policy	Relevant	Change	Not needed
<b>Site Allocations</b>			
A1. Alperton House			
A2. Minavil House & Unit 7, Rosemont Road			
A3. Former B&Q and Marvelfairs House			
A4. Atlip Road			
A5. Sunleigh Road			
A6. Woodside Avenue			
A7. Mount Pleasant / Beresford Avenue			
SK1. Queen's Park Station Area			
SK2. British Legion, Marshall House and Albert Road Day Centre			
SK4. Canterbury Works			
SK5. Moberley Sports Centre			
CE1. Church End Local Centre			
CE3. Former White Hart PH and Church			
CE4. Homebase			
CE5. Chancel House			
CE6. Asiatic Carpets			
B/C1. Oriental City and Asda			
B/C2. Sarena House / Grove Park / Edgware Road			
B/C3. Capitol Way			
B/C4. 3-5 Burnt Oak Broadway			
PR1. Former Guinness Brewery			
PR2. First Central			

## Site Allocations

Policy	Relevant	Change	Not needed
<b>Site Allocations</b>			
PR3. Former Central Middlesex Hospital			
1. Metro House			
2. Garages at Barnhill Road			
3. Dollis Hill Estate			
4. Dollis Hill House			
5. Priestly Way, North Circular Road			
6. Neasden Lane / Birse Crescent			
7. Neasden Lane / North Circular Road			
8. Former Kingsbury Library & Community Centre			
9. Harlesden Plaza			
10. Former Willesden Court House			
11. Manor Park Road			
12. Former Willesden Social Club & St. Joseph's Court			
13. Sainsbury's Superstore			
14. Clock Cottage			
15. Northwick Park Hospital			
16. Morrison's Supermarket			
17. Alpine House			
18. Bridge Road			
19. Stonebridge Schools			
20. Former Unisys & Bridge Park Centre			
21. Land Adjoining St. Johns Church			

# Site Allocations

Policy	Relevant	Change	Not needed
<b>Site Allocations</b>			
22. Roundtree Road			
23. Vale Farm Sports Centre			
24. Wembley Point			
25. Vivian Avenue			
26. Old St. Andrew's Church			
27. Hawthorn Road			
28. Queen's Parade / Electric House			
29. Former Dudden Hill Lane Playground			
30. Gaumont State Cinema			
31. Kilburn Square			
32. Former Rucklidge Service Station			
T1. 12-14 Carlisle Road			
T2. Barningham Way			
T3. Oxgate Lane			
T4. Humber Road			
T5. Sidmouth Road			
T6. Waxlow Road			

# Wembley Area Action Plan

Policy	Relevant	Change	Not needed
<b>Wembley Area Action Plan</b>			
WEM 1 Urban Form			
WEM 2 Gateways to Wembley			
WEM 3 Public Realm			
WEM 4 Public Art			
WEM 5 Tall Buildings			
WEM 6 Protection of Stadium Views			
WEM 7 Character of Olympic Way			
WEM 8 Securing Design Quality			
WEM 9 Offices			
WEM 10 Low-cost Business Start-up Space			
WEM 11 Protected Rail Sidings			
WEM 12 Road and Junction Improvements to Stadium Access Corridor and Western Access Corridor			
WEM 13 Western Highway Corridor			
WEM 14 Car Parking Strategy			
WEM 15 Car parking standards			
WEM 16 Walking and Cycling			
WEM 17 Event Related Transport			
WEM 18 Housing Mix			
WEM 19 Family Housing			
WEM 20 Extra Care Housing			
WEM 21 Wheelchair Housing and Supported Housing			
WEM 23 Student Accommodation			

# Wembley Area Action Plan

Policy	Relevant	Change	Not needed
<b>Wembley Area Action Plan</b>			
WEM 24 New retail development			
WEM 25 Strategic Cultural Area			
WEM 26 Hot Food Takeaways (A5 Uses)			
WEM 27 Conferencing Facilities			
WEM 28 Temporary Creative Uses			
WEM 29 Community Facilities			
WEM 30 Decentralised Energy			
WEM 31 Energy from Waste			
WEM 32 Urban Greening			
WEM 33 Flood Risk			
WEM 34 Open Space Provision			
WEM 35 Open Space Improvements			
WEM 36 Food Growing			
WEM 37 Sports Facilities			
WEM 38 Play Provision			
WEM 39 Access to Nature			
WEM 40 River Brent and Wealdstone Brook			
Site W 1 Wembley West End			
Site W 2 London Road			
Site W 3 Chiltern Line Cutting North			
Site W 4 High Road / Chiltern Line Cutting South			
Site W 5 Copland School and Brent House			

# Wembley Area Action Plan

Policy	Relevant	Change	Not needed
<b>Wembley Area Action Plan</b>			
Site W 6 South Way Site adjacent to Wembley Stadium Station			
Site W 7 Mahatma Gandhi House			
Site W 8 Land West of Wembley Stadium			
Site W 9 York House			
Site W 10 Dexion House			
Site W 11 Malcolm House			
Site W 12 North West Lands			
Site W 13 Stadium Retail Park			
Site W 14 Arena House and Crescent House			
Site W 15 Apex House & Karma House			
Site W 16 1 Olympic Way			
Site W 17 Olympic Way Office Site			
Site W 18 Wembley Retail Park			
Site W 19 Wembley Stadium Car Park			
Site W 20 Cottrell House and Norman House			
Site W 21 21-31 Brook Avenue			
Site W 22 Wembley Park Station Car Park			
Site W 23 The Torch/Kwik Fit Euro			
Site W 24 Town Hall			
Site W 25 Amex House			
Site W 26 Watkin Road			
Site W 27 Euro Car Parts			

# Wembley Area Action Plan

Policy	Relevant	Change	Not needed
<b>Wembley Area Action Plan</b>			
Site W 28 First Way			
Site W 29 Second Way			
Site W 30 Drury Way			
Site W 31 Great Central Way			

## Development Management Policies

Policy	Relevant	Change	Not needed
<b>Development Management Policies</b>			
DMP 1 Development Management General Policy			
DMP 2 Supporting Strong Centres			
DMP 3 Non-Retail Uses			
DMP 4 Neighbourhood Parades and Isolated Shop Units			
DMP 4a Shop Front Design and Forecourt Trading			
DMP 5 Markets and Carboot Sales			
DMP 6 Visitor Accommodation and Attractions			
DMP 7 Brent's Heritage Assets			
DMP 8 Open Space			
DMP 9 Waterside Development			
DMP 9a Managing Flood Risk			
DMP 9b On Site Water Management and Surface Water Attenuation			
DMP 10 Capital Ring			
DMP 11 Forming an Access on to a Road			
DMP 12 Parking			
DMP 13 Movement of Goods and Materials			
DMP 14 Employment Sites			
DMP 15 Affordable Housing			
DMP 16 Resisting Housing Loss			
DMP 17 Conversion of Family Sized Dwellings			
DMP 18 Dwelling Size and Residential Outbuildings			
DMP 19 Residential Amenity Space			



# Development Management Policies

Policy	Relevant	Change	Not needed
<b>Development Management Policies</b>			
DMP 20 Accommodation with Shared Facilities or additional support			
DMP 21 Public Houses			

# Glossary

Term	Definition
<b>Archaeological Priority Areas</b>	Areas where there is significant known archaeological interest or potential for new discoveries
<b>Article 4 Direction</b>	Direction which removes some or all permitted development rights which were granted by the General Permitted Development Order
<b>Equality Impact Assessment (EqIA)</b>	Analysis of proposed organisational policy, or a change to an existing one, which assesses whether the policy will cause a disparate impact on people who have a protected characteristic
<b>Habitat Regulation Assessment (HRA)</b>	A statutory requirement (under European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora) which requires local planning authorities to assess whether any plan or project, either alone or in-combination, will have a likely significant effect on habitats and species of European importance.
<b>Health Impact Assessment (HIA)</b>	Assessment which evaluates the health and well-being of a population and how it may be affected by a plan, project or policy. The assessment will identify ways in which positive impacts for health gain can be maximised, and risks to health minimised.
<b>Houses of Multiple Occupation (HMOs)</b>	A property which is rented out by at least 3 people who are not from 'One household' (e.g. a family) but share facilities, such as a living room, kitchen and bathroom
<b>Integrated Impact Assessment (IIA)</b>	Brings together the Sustainability Appraisal (SA), Strategic Environmental Appraisal (SEA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) into a single framework.
<b>Locally Significant Industrial Sites (LSIS)</b>	Areas which have particular importance for industrial and related functions at a local level.
<b>National Planning Policy Framework (NPPF)</b>	Sets out Central Government's planning policies for England and how these are expected to be applied.
<b>Strategic Industrial Location (SIL)</b>	Identified within the London Plan, Strategic Industrial Locations (SILs) are London's main reservoir of industrial land. SILs are given strategic protection due to their scale and relatively homogenous character which means that they are able to accommodate activities which might raise tensions with other land uses.
<b>Site of Importance for Nature Conservation (SINC)</b>	Areas designated for their importance for wildlife and for people to experience nature. SINC receive a high degree of protection through policies in the Mayor's London Plan and the land-use planning process.
<b>Strategic Environmental Assessment (SEA)</b>	A statutory requirement (as set out in the Environmental Assessment of Plans and Programmes Regulation 2004) which requires local planning authorities to carry out a formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
<b>Strategic Housing Land Availability Assessment (SHLAA)</b>	A Strategic Housing Land Availability Assessment (SHLAA) is an important step in the preparation of a Local Plan. The assessment identifies a future supply of land which is considered to be suitable, available and achievable.
<b>Strategic Housing Market Assessment (SHMA)</b>	A Strategic Housing Market Assessment (SHMA) is an important step in the preparation of the Local Plan. The assessment identifies the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period.
<b>Sustainability Appraisal (SA)</b>	Iterative process carried out during the preparation of a development plan document. Appraises the economic, environmental and social effects of a plan to enable decisions to be made that accord with sustainable development.
<b>Windfall</b>	Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.



