

Post-Hearings Integrated Impact Assessment (IIA) Addendum: Impacts of Proposed Main Modifications

IN SUPPORT OF THE BRENT LOCAL PLAN 2020-2041
PLANNING POLICY TEAM

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Introduction

The submitted draft Brent Local Plan (2020-2041) was subject to Examination hearing sessions from 28th September to 16th October 2020. These hearing sessions were to address a series of matters, issues and questions identified by the independent Inspectors appointed to examine the Plan. In response to representations received and directions from the Inspectors, the Council is proposing a number of main modifications to the Plan. These include modifications to existing policies, and the creation of new policies. These are in order to make the Plan sound in accordance with paragraph 35 of the National Planning Policy Framework.

Modifications have also been proposed as a result of influences outside of the Hearing Sessions. This includes the need to be in General Conformity with the newly adopted London Plan, and the Secretary of States (SoS) directions on 13th March and 10th December 2020, thereof.

Ultimately, these modifications will have implications upon the outputs of each policy. These outputs may result in different impacts as they relate to sustainability, with potential for impacts to be distributed unevenly across groups with protected characteristics.

This document therefore seeks to assess the impacts of these proposed main modifications across a number of social, economic and environmental criteria, as well as their potential for impact upon individuals protected characteristics. This forms an addendum to the Local Plan Integrated Impact Assessment.

For consistency, the approach taken reflects that used within the Brent Local Plan Submission stage IIA. The appraisal methodology has been included within [Appendix A](#), [Appendix B](#), and [Appendix C](#).

Appraisal

Main modifications have been defined as amendments which take place within the policy itself, or are significant new supporting paragraphs/ amendments to them which are integral to the policy. This therefore excludes small grammatical/ terminological amendments, and those smaller changes which relate to the clarity/ brevity of a policy identified as minor modifications. It is not foreseen that minor modifications will alter policies to the point whereby the sustainability of their outcomes would change. Appraisals have therefore only been undertaken for policies receiving main modifications which are significant insofar as they alter their general thrust, and thus could be expected to potentially have differing outcomes within the sustainability matrix. A screening process of all proposed main modifications has been undertaken to this effect, and is included within [Appendix E](#).

During regulation 19 stage consultation, the Environment Agency commented upon the Sustainability Criteria used to appraise the potential flooding of sites. This resulted in an amendment to the flooding criteria, and a reassessment of sites scoring accordingly. For ease of access, a table summarising these amendments has been included within [Appendix D](#).

This section will be structured as follows:

- Policy including proposed modifications. New text is **underlined/ bold**, whilst deleted text is ~~struck through~~. Significant amendments as it relates to the sustainability appraisal have been **coloured red**. Where policies are of significant length, only those sections pertinent to the Appraisal will be included.

- Justification of the above proposed modification.
- Sustainability appraisal matrix. Where the policy is not new, but rather is being amended, the appraisal matrix from the submission stage Local Plan IIA is included for comparison alongside the new appraisal. Any changes in scores within criteria will be **coloured red**.
- Where proposed modifications have been carried over from the Submission stage version of the draft Local Plan, a summary of their potential impacts, and associated amendments to the scoring has been included.
- Explanation for how the sustainability outputs have been arrived at, and how this differs compared with submission stage outputs (if not a new policy).

Analysis is broken down by chapter, as follows:

Chapter 4 – Development Vision and Good Growth in Brent

How Will Good Growth in Brent be Delivered?

Policy and modifications:

Amend to read:

How will Good Growth in Brent Be Delivered?

4.1 4.37 The London Plan includes six Good Growth ~~Policies~~Objectives that set out the fundamentals on which development in London should deliver. In Brent highlights of how these will be addressed in relation to places and subject chapters in supporting delivering the development vision and good growth are:

1. Strong & Inclusive Communities

- Reduce spatial inequalities within Brent and incidences of areas with high levels of multiple deprivation by promoting mixed and balanced communities particularly around Wembley, Stonebridge, Harlesden, Neasden and South Kilburn and on council housing estates
- Building on Brent’s status as London Borough of Culture 2020 by supporting inclusive places, where ethnic diversity is celebrated and recognised, and places where cultural activities are already concentrated, e.g. Wembley, Cricklewood and Kilburn High Road
- Create a more equal and affordable borough, where the opportunities to access good quality housing, employment, education, digital connectivity and culture are maximised
- Strengthen the existing sense of community by celebrating Brent’s diversity, heritage and culture, and creating places where Brent’s community can meet
- Ensuring the delivery of a wide range of essential social infrastructures in Growth Areas and across the Brent to support the delivery of sustainable communities

2. Making the best use of land

- a) Prioritising the majority of residential development in new and more efficiently and intensively developed Growth Areas ~~such including~~ Northwick Park, Staples Corner and Neasden Stations and continuing to deliver in those that have already been started, ~~such as in~~ Alperton, Burnt Oak/ Colindale, Church End, South Kilburn and Wembley to enhance environmental quality, and bring benefits to the community;
- b) Supporting higher density development in Brent's town centres, Intensification Corridors and in areas with good accessibility to public transport,
- c) encouraging greater access, recreational use and also understanding of ecology in Brent's extensive areas of open spaces, such as the Welsh Harp and Fryent Country Park
- d) Identifying appropriate areas for tall buildings and change that add quality to and complement Brent's character and sense of place

3. Creating a Healthy Borough

- a) Using the iconic sporting heritage associated with Wembley Stadium to play its part in stimulating greater levels of activity.
- b) Integrating physical activity back into the everyday lives of residents through promoting safe environments, active travel and improving access to open spaces, sports and leisure facilities.
- c) Improving physical and mental well-being for borough residents by adopting a health-integrated planning approach
- d) Reducing health inequalities through focusing on narrowing the gap between the most affluent and the most deprived areas of the borough
- e) Ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough
- f) Improving Brent's air quality overall and particularly in Growth Areas

4. Growing a Good Economy

- a) Make better use of Brent's ~~employment~~ industrial land and overall increase its industrial floorspace through a structured approach to deliver industrial-its intensification and land release, where appropriate and also where possible support additional housing/ community facilities through co-location
- b) Support Brent's priority high streets in adapting to ~~the changing~~ lifestyles, including the way people shop, lifestyles- and the challenges posed by other large centres in London, with, where appropriate, additional retail and leisure floorspace and supporting Wembley's growth to metropolitan centre status
- c) Promote and support a strong and diverse night-time economy in Wembley, Cricklewood, Kilburn and Wembley Park to contribute to London's role as a 24-hour city
- d) Delivering a minimum of 2,622 serviced accommodation rooms to support town centre economies, particularly those of Kilburn and Wembley

- e) Protecting existing viable office floorspace and identifying sites within Wembley to provide new high quality office floorspace.
- f) Continue to support Brent's high level of entrepreneurship and small business formation by encouraging new creative industries and affordable workspace

5. Increasing Efficiency and Resilience

- a) Reduce carbon emissions by supporting the continued expansion of local and renewable energy systems such as those at Wembley Park and South Kilburn and into other Growth Areas
- b) Tackle congestion and air quality around the North Circular, improving orbital public transport routes such as the West London Orbital railway scheme and prioritising active travel to provide realistic alternatives to travelling by car
- c) Reduce the risk of flooding from the River Brent and its tributaries and other sources by putting the right development in the right places and reducing surface water run-off and potable water use
- d) Provide a safe and inclusive environment around Wembley Stadium and Wembley Arena to support their iconic status for positive memories to be made
- e) Continue to support Brent's award-winning street tree planting initiatives and greening of the built environment to combat air pollution, flooding, overheating and threats to ecological habitats
- f) Enhancing the capacity of existing green and blue infrastructure such as Welsh Harp, the river Brent corridor and Grand Union Canal across a range of needs, including recreation, biodiversity and climate change

6. Delivering the homes to meet Brent's needs

- a) Housing delivery will be maximised, with sufficient planning permissions to support delivery of more homes than the minimum London Plan housing target of 23,250 between 2019/20-2028/29. A minimum 46,018 dwellings will be delivered for the whole plan period of 2019/20-2040/41 on average 2040 homes a year in the period to 2041 to meet principally Brent's housing needs but also those of wider London;
- b) Providing new homes in truly mixed, inclusive communities across a range of tenures, maximising the provision of affordable homes with a particular emphasis on social rented properties, but also more affordable home ownership and improved opportunities for higher quality market rented properties;
- c) Providing new family housing with at least 25% of new homes being 3 bedrooms or more, ~~recognising that Brent's suburban context provides opportunities for houses as well as flats;~~

Meeting the growing need for specialist housing such as the 230 homes for older people per year to accommodate Brent's aging population and others with challenges who may require additional support.

Justification:

- 1e) Provide sufficient reference to social infrastructure as part of creating strong and inclusive communities.
- 2d) To reflect the policy emphasis in BD1 and BD2.
- 3e) To provide further clarity how a healthy borough will be supported with an emphasis on indoor and outdoor sports facilities.
- 4d) Consistency with the London Plan
- 4e) Reflective of London Plan evidence base of needs but also limited viability of building new space currently.
- 4f) Reflective of characteristics of high small business formation in Brent and the need for affordable space.
- 5f) Objective reflective of emphasis in Policy BGI1 on recreation, bio-diversity and BSUI1 on climate change.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Post hearing: 1e)	++	++	N/A	+	+	++	++	+	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	N/A	N/A	N/A	+	+	+	+	+
Post hearing: 2d)	+	?	++	0	N/A	+	++	++	N/A	N/A	N/A	+	+	N/A	0	0	N/A	+	N/A	N/A	N/A	N/A	N/A	N/A
Post hearing: 3e)	++	++	N/A	+	N/A	++	++	+	N/A	N/A	N/A	0	N/A	N/A	0	N/A	+	0	0	N/A	N/A	N/A	N/A	N/A
Post hearing: 3f)	N/A	++	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	++	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Post hearing: 4d)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+	+	+	N/A	+
Post hearing: 4e)	N/A	N/A	N/A	N/A	N/A	N/A	+	+	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+	+	+	N/A	+
Post hearing: 4f)	+	N/A	N/A	N/A	N/A	N/A	+	+	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+	+	+	+	+
Post hearing: 5f)	+	++	N/A	++	+	+	+	+	N/A	++	++	++	++	N/A	+	+	+	++	+	N/A	N/A	N/A	N/A	N/A

Explanation of post-hearing scoring: These criteria are new. This policy, due to its length and diversity, was considered on the basis of individual criterion separately for previous IIA SA's.

Criteria 1e), 3e) and 5f) all regard the delivery on new infrastructure, and as such will be considered together. All serve to bolster the already strong policy which seeks to strengthen communities and their inclusivity, reflecting the London Plan criteria of the same objective. They serve to deliver new social infrastructure, with one specific to indoor and outdoor sports facilities. As such their predominant impacts regard social factors, for which they score positively or significantly positively, given their aspirations to provide more community facilities and the implications that has on community resilience. Criterion 1e is more likely to have minor positive outcomes with regards to the economic criteria, as it regards the delivery of new social infrastructure which may open up new opportunities for communities. Whilst criterion 3e may have impacts upon environmental criteria, given it may see the delivery of new outdoor sports facilities, such as pitches, which may increase open space generally and improve the environment accordingly. All measures have potential to reduce traffic, given their aspiration to deliver social infrastructures within the communities they serve, reducing the need to travel. Due to its far reaching potential, the delivery and enhancement of new and existing open space as set out in criterion 5f) is likely to positively impact a number of social and environmental areas.

Criterion 2d) seeks to identify appropriate locations for tall buildings within Brent. This will enable the greater delivery of homes, in more sustainable locations adjacent to key infrastructures, helping to make more efficient use of existing brownfield land, and removing pressure from developing green spaces. The delivery of tall buildings will contribute positively to Brent's character and townscape, helping to provide a better sense of place.

Criterion 3f) seeks to improve the borough's air quality, particularly in growth areas where there will be a concentration of new homes and therefore proportionately more residents will benefit from higher standards. This is seen to have positive impacts upon health and well-being, and environmental health.

Criteria's 4d), 4e), and 4f) each come under the broad category of 'growing a good economy'. As such they largely impact upon the same criteria, and will be considered together. 4d) seeks to ensure a sufficient number of accommodation rooms are provided to support the tourist and night time economies in particular; criterion 4e) seeks to ensure sufficient office space is secured to support the economic function of the borough; and criterion 4f) seeks to support Brent's entrepreneurialism. These are all anticipated to provide positive benefits with regards to the accessibility jobs and services, reducing the need to travel/ commute given their sustainable locations, as well as improve the growth and regeneration of the borough, improve employment opportunities and increase investment.

On age, race and sexual orientation, disability, pregnancy and maternity, sex, marriage and civil partnership, gender reassignment and religion and belief the policy will have benefits to those with a protected characteristic. This good growth policy builds on that of the London Plan 2021, which in itself specifically makes reference to "support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers and challenges and inequalities".

Chapter 5 – Places

5.1 – Central Place

BP1 (Central Place)

Policy and modifications:

Town Centres:

- d) Planning for the development **by 2028** of ~~6,700~~ **2,100** sqm comparison goods **retail** floorspace ~~by 2028~~, and ~~6,100~~ **4,300** sqm of convenience goods **retail** floorspace, in addition to that already existing and consented, directed towards Wembley and Wembley Park town centres to support their future designation as a single metropolitan centre at the London Plan level
- ~~e) Providing at least one additional food store of between 1,000 and 2,000sqm~~
- f) Diversifying the town centre offer to include more cultural and leisure facilities

Employment and Skills

- g) Encouraging the intensification of existing Strategic Industrial Locations closer to the North Circular Road
- h) **Retaining** ~~introducing a greater~~ **significant** proportion of ~~employment~~ **industrial** floorspace in new mixed-use developments on Watkin Road and First Way to the east of the Stadium ~~than previously allocated in the Wembley Area Action Plan~~

Justification: To provide consistency with evidence base document on town centres, and consistency with site allocation policies.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	++	+	++	+	0	++	+	+	-	+	+/-	++	+	+	0	0	+	++	+	++	+	++	0	+
Post hearing	++	+	++	+	0	++	+	+	-	+	+/-	++	+	+	0	0	+	++	+	++	+	++	0	+

Explanation of post-hearing scoring: No change. The amendments considered here include a reduction in the delivery of town centre floorspace, and potentially on industrial floorspace also. The quanta of town centre floorspace required reflects the evidence within the Brent Retail and Leisure Needs Assessment 2019. The quanta

previously included reflected an earlier draft of that document. As such, although the quanta has reduced, it still serves to meet the most up to date needs identified within the evidence base and is therefore not considered to impact upon the SA criteria scoring. The change to criterion H reflects amendments made to site allocations which have been updated due to the granting of planning permission on these sites. The policies therefore need to reflect the reality of development which has been granted, which has gone through rigorous assessment through the planning process.

Policy BCGA1 (Wembley Growth Area)

Policy and modifications:

All developments will achieve the highest design standards. Energy efficient design and renewable energy are encouraged. Development will provide at least 15,000 new homes, supported by infrastructure identified within the Infrastructure Delivery Plan. Anticipated infrastructure will include:

- **Open space provision:**
 - **1 x 2.8ha (7 acres) Local Park**
 - **4 x 0.2ha pocket parks**
 - **Series of equipped play areas within new developments, improvement to existing open space, creation of informal recreation and good quality public realm**
 - **Outdoor sports/ gym and MUGAs**

Justification: To provide consistency with policy BGI1 and evidence base of Growth Area open space requirement

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	+	+	0	+	+	+	-	+	-/+	+	+	+	-/+	+	+	+	?	+	+	+	+	+
Post hearing	+	++	+	+	0	+	+	+	-	+	-/+	++	+	+	-/+	+	+	+	?	+	+	+	+	+

Explanation of post-hearing scoring: It is anticipated that the delivery of additional open space facilities will increase both criteria's S2 (health and wellbeing), and EN5 (biodiversity). New parks are likely to increase people's mental and physical well-being, as well as providing places of refuge for biodiversity. It is considered that these positive impacts will be felt across all protected characteristic groups as they will be made accessible to all.

Policy BCSA1 (Asda/ The Torch/ Kwikfit)

Policy and modification:

Infrastructure requirements:

Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.

Justification: To reflect Thames Water requirements regarding capacity of existing infrastructure.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a EN11	a EN12	b EN12	c EN12
Submission	++	+	++	++	++	++	++	0	++	0	0	!	0	?	0	0	+	+	+	-
Post hearing	++	+	++	++	++	++	++	0	++	0	0	!	0	?	0	0	+	+	+	-

Explanation of post-hearing scoring: Reference to need for water infrastructures of no impact as no relevant criteria.

Policy BCSA2 (Stadium Retail Park and Fountain Studios)

Policy and modifications:

Planning considerations:

- The site is in flood zones **2 and 3a** and susceptible to surface water flooding. All proposed development will require a detailed Flood Risk Assessment (FRA). **Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.**

Infrastructure requirements:

Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.

Justification: To provide a safe development consistent with national policy. To reflect Thames Water requirements regarding capacity of existing infrastructure.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11 ^a	EN12 ^a	EN12 ^b	EN12 ^c
Submission	-	+	++	++	++	++	++	0	+	0	0	!	0	?	0	0	+	0	+	-
Post hearing	-	+	++	++	++	++	++	0	+	0	0	!	0	?	0	0	+	0	+	-

Explanation of post-hearing scoring: No change. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed. Reference to need for water infrastructures of no impact as no relevant criteria.

Policy BCSA3 (Brook Avenue)

Policy and modifications:

Planning considerations:

- Some of the existing dwellings in Brook Avenue are within functional floodplain zone 3a and 3b (surface water and fluvial and tidal) and are at risk of flooding. The redevelopment of these dwellings provides the opportunity to reduce the real risk of flooding to property by bringing development closer to Brook Avenue away from the watercourse. As the site is over one hectare all development will be required to undertake a detailed Flood Risk Assessment (FRA). **Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.**

Justification: To provide a safe development consistent with national policy.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11 ^a	EN12 ^a	EN12 ^b	EN12 ^c
Submission	0	+	++	++	++	++	++	0	+	0	+	!	0	?	0	0	0	!	+	!
Post hearing	0	+	++	++	++	++	++	0	+	0	+	!	0	?	0	0	0	!	+	!

Explanation of post-hearing scoring: No change. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed.

Policy BCSA4 (Fifth Way/ Euro Car Parts)

Policy and modifications:



Indicative Capacity

~~Up to 700 dwellings (residential and student accommodation). Employment space and hotel space to be confirmed.~~ **450 dwellings and industrial space to be confirmed**

Planning considerations:

- Given ~~the identified need within the~~ **the identified need within the** ~~Brent's status as a provide capacity borough, the council will seek~~ **the maximum viable re-provision of** ~~no net loss of employment~~ **industrial** ~~floorspace and if a plot ratio of 0.65 is greater, encourage the maximisation of its provision suitable for and B1 (c), B8 and B2 use as a part of any redevelopment of this site.~~

Justification: To remove the waste site and reflect new capacity figure accordingly, and consistency with policy BE3 on employment floorspace re-provision

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	++	++	0	++	++	0	+	0	+	!	0	?	0	0	+	0	+	-
Post hearing	-	+	++	++	0	++	++	0	+	!	+	!	0	?	0	0	+	0	+	-

Explanation of post-hearing scoring: The site is adjacent to an existing waste use. As such criterion EN2a has been updated to reflect this, acknowledging the fact that living within close proximity to noisy, smelly, and otherwise disruptive uses can negatively impact upon receptors. Redevelopment of this site will likely require the re-provision of an equivalent waste site elsewhere within the local area, at a less disruptive location, and as such, is unlikely to be of impact should the site be delivered for residential uses.

Other Implications regard criterion S3a (housing). The site still delivers 100+ homes. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BCSA5 (Olympic Office Centre)

Policy and modification:

Infrastructure requirements:

Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.

Justification: To reflect Thames Water requirements regarding capacity of existing infrastructure.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	++	++	++	++	-	0	+	0	0	!	0	?	0	0	+	+	+	-
Post hearing	-	+	++	++	++	++	-	0	+	0	0	!	0	?	0	0	+	+	+	-

Explanation of post-hearing scoring: Reference to need for water infrastructures of no impact as no relevant criteria.

Policy BCSA6 (Watkin Road)

Policy and modifications:

New site boundary:



Allocated Use

Mixed-use, residential-led development **incorporating maximum re-provision of industrial space** to the west of the site, adjacent to other schemes coming forward as part of the Wembley Park masterplan transitioning to a more commercial-led use towards the east of the site bordering Wembley Business Centre industrial estate.

Indicative Capacity

~~Assumed 1000 dwellings on basis of density of existing permissions prior to more detailed assessment, 717~~ plus employment **industrial** floorspace at ground floor

Planning considerations:

- The site falls within Flood Zones 3a (Surface, Fluvial and tidal). A Flood Risk Assessment will be required as part of any development coming forward. **Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.**

Justification: Site boundary changed to remove the constructed site.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	++	++	0	++	++	0	+	0	+	!	0	?	0	0	+	-	+	-
Post hearing	-	+	++	++	0	++	++	0	+	!	+	!	0	?	0	0	+	-	+	-

Explanation of post-hearing scoring: The site is adjacent to an existing waste use. As such criterion EN2a has been updated to reflect this, acknowledging the fact that living within close proximity to noisy, smelly, and otherwise disruptive uses can negatively impact upon receptors. Redevelopment of this site will likely require the re-provision of an equivalent waste site elsewhere within the local area, at a less disruptive location, and as such, is unlikely to be of impact should the site be delivered for residential uses.

Other implications consider criterion EN12c, with regards to surface water flooding and S3a with regards to housing. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed. With regards to S3a, the site still delivers 100+ homes. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable

quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BCSA7 (Wembley Park Station South)

Policy and modifications:

Allocated Use
Mixed-use residential-led development to include replacement of the existing office space TfL ancillary accommodation
Indicative Capacity
456_400 dwellings (300 southern site, 100 northern)

Justification: Recognition of need to reprovide essential facilities. To match dwelling numbers in housing trajectory reflecting sites splitting into two.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11 ^a	EN12 ^a	EN12 ^b	EN12 ^c
Submission	0	+	++	++	++	++	++	0	+	0	0	!	0	?	0	0	+	+	+	-
Post hearing	0	+	++	++	++	++	++	0	+	0	0	!	0	?	0	0	+	+	+	-

Submission stage amendments:

- Clarification that development must re-provide TfL ancillary accommodation. No overall change in gain or loss of employment space so no change to ratings.

Explanation of post-hearing scoring: No change. Implications only regard criterion S3a (housing). The site still delivers 100+ homes.

Policy BCSA8 (Wembley Retail Park)

Policy and modifications:

Indicative Capacity

~~2180~~ **2260**

Planning considerations

- Given Brent's status as a ~~provide capacity borough~~, **the identified need within the borough**, should the parameters of the existing outline need to be reviewed or a full application received the council will seek to ensure ~~no net loss of the remaining employment~~ **maximum industrial** floorspace ~~and encourage maximisation of additional re~~provision.

Justification: To match dwelling numbers in housing trajectory, and make consistent with policy BE3 on employment floorspace reprovision.

IIA Objective Scoring:

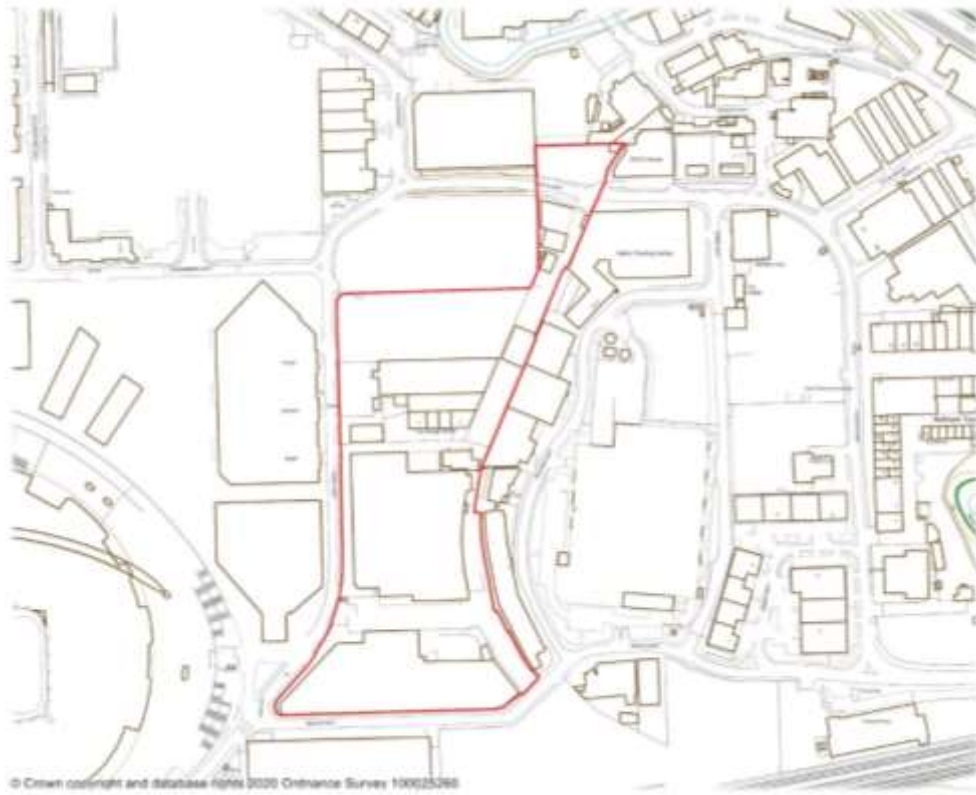
Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	^a EN11	^a EN12	^b EN12	^c EN12
Submission	-	+	++	++	0	++	-	0	+	0	0	!	0	?	0	0	+	+	+	-
Post hearing	-	+	++	++	0	++	-	0	+	0	0	!	0	?	0	0	+	+	+	-

Explanation of post-hearing scoring: No change. Implications only regard criterion S3a (housing). The site still delivers 100+ homes. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BCSA9 (First Way)

Policy and modifications:

New site boundary:



Allocated Use

Residential-led mixed-use development, including ~~student accommodation~~/ education and **business industrial**.

Indicative Capacity

1312-1200 dwellings

Justification: Site boundary changed to add the waste site from BCSA4 to the North. To match dwelling numbers in housing trajectory. Consistency with London Plan terminology.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	-	++	++	0	+	++	+	-	0	0	!	!	?	0	0	+	+	+	-
Post hearing	-	-	++	++	0	+	++	+	-	!	0	!	!	?	0	0	+	+	+	-

Submission stage amendments:

- Change in terminology from 'business' to 'industrial'. No overall change in gain or loss of employment space so no change to ratings.

Explanation of post-hearing scoring: The site includes an existing waste use. As such criterion EN2a has been updated to reflect this, acknowledging the fact that living within close proximity to noisy, smelly, and otherwise disruptive uses can negatively impact upon receptors. Redevelopment of this site will likely require the re-provision of an equivalent waste site elsewhere within the local area, at a less disruptive location, and as such, is unlikely to be of impact should the site be delivered for residential uses. Other implications regard criterion S3a (housing). The site still delivers 100+ homes.

Policy BCSA10 (York House)

Policy and modifications:

Allocated Use
Nursery and 3FE primary school

Justification: To incorporate essential infrastructure needs.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	++	n/a	++	++	++	+	++	0	0	!	0	+	0	0	+	+	+	+

Post hearing	-	+	++	n/a	++	++	++	+	++	0	0	--	0	+	0	0	+	+	+	+
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Explanation of post-hearing scoring: No change anticipated. Positive impacts already picked up by the delivery of the proposed primary school.

Policy BCSA11 (College of North West London Wembley)

Policy and modifications:

<p>Planning considerations:</p> <ul style="list-style-type: none"> Most of the site falls almost entirely within Flood Zones 2 and 3. A Flood Risk Assessment will be required as part of any development coming forward. Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2. <p>Infrastructure requirements:</p> <p>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p>

Justification: To make consistent with national policy regarding flooding. To reflect Thames Water requirements regarding capacity of existing infrastructure.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	^a EN11	^a EN12	^b EN12	^c EN12
Submission	-	+	++	++	++	++	++	0	++	0	+	!	0	+	!	0	+	!	+	!
Post hearing	-	+	++	++	++	++	++	0	++	0	+	!	0	+	!	0	+	!	+	!

Explanation of post-hearing scoring: No change. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed. Reference to need for water infrastructures of no impact as no relevant criteria.

Policy BCSA12 (Land to South of South Way)

Policy and modifications:

Planning considerations

- ~~Prior to its Wembley Area Action Plan allocation, The site was formerly Strategic Industrial Land. It still and contains numerous occupied business industrial premises. Notwithstanding the acceptability of residential on site consistent with the previous WAAP allocation, Brent's status as a 'provide capacity' borough in the London Plan means that no net loss of employment. **Given the identified industrial floor space need in the borough, the maximum viable amount of industrial floorspace will be required.** and the re-provision of B1 (c), B8 and B2 use at ground floor/basement level should be undertaken as part of development consistent with a plot ratio of 0.65.~~

Justification: To make consistent with policy BE3 on employment floorspace.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a EN11	a EN12	b EN12	c EN12
Submission	-	-	++	++	0	+	++	0	-	0	0	!	!	?	0	0	+	+	+	-
Post hearing	-	-	++	++	0	+	++	0	-	-	0	!	!	?	0	0	+	+	+	-

Explanation of post-hearing scoring: The site is adjacent to Strategic Industrial Land (SIL) designated land. The West London Waste Plan identifies SIL as being appropriate for the inclusion of waste sites. As such, the adjacent land has the potential to deliver disruptive uses which could negatively impact upon the proposed residential use at this site. Should this happen, the Council would consider this potential impact with regards to the site's future delivery, and when considering the London Plan Agent of Change principle, would expect that the proposed use, if delivered after residential plans consented at this site, would mitigate any potential impact.

The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BCSA13 (Former Malcolm House Site)

Policy and modifications:

Allocated Use
 Mixed Use with **maximum viable a minimum of 0.65 plot ratio** ~~B1 business use,~~ **light industrial/ research & development floorspace** with the remainder being of main town centre uses or residential

Justification: To make consistent with policy BE3 on employment floorspace.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11 a	EN12 a	EN12 b	EN12 c
Submission	-	+	++	++	++	++	-	0	+	0	0	!	0	?	0	0	+	+	+	+
Post hearing	-	+	++	++	++	++	-	0	+	0	0	!	0	?	0	0	+	+	+	+

Explanation of post-hearing scoring: No change. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BCSA16 (Land north of Engineers Way, between Brent Civic Centre and Olympic Way)

Policy and modifications:

Comments

Outline consent for A1-A5 and B1/C1/D1 uses and development parameters granted through 18/0968. **Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.**

Justification: To make consistent with national policy regarding flooding.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	++	N/A	++	++	-	+	+	0	0	-	0	+	0	0	0	+	+	-
Post hearing	-	+	++	N/A	++	++	-	+	+	0	0	-	0	+	0	0	0	+	+	-

Explanation of post-hearing scoring: No change. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed.

New Policy BCSA20 (Wembley Park Station North)

Policy and modifications:

[Add new policy](#)

[Site Plan](#)



Existing Use

Disused railway sidings

Allocated Use

Mixed-use residential-led development

Indicative Capacity

100

Timeframe for Delivery

1-5 Years -

6-10 Years -

11+ Years 100

Address

Wembley Park Station, Wembley, HA9 9AA

Area

0.72 ha

Description of Existing Site

The site lies to the north of the rail line running through Wembley Park Station. The site comprises disused rail sidings. The main road access to the site comes from Forty Avenue. To the north there is a nursing home and opposite the site on the other side of Forty Avenue is the Sattavis Patidar Centre. Across the railway line to the south are 4 residential blocks ranging from 5 to 8 storeys.

Ownership

Site owned by TfL

Planning History

No relevant planning history.

PTAL Rating

4 (current and 2031 estimate)

Planning Considerations

- **The site is located within the Wembley Opportunity Area and the Wembley Growth Area, making it suitable for residential, with the potential for mixed-use development along the Forty Lane frontage.**
- **Vehicular access to the site from Forty Avenue could be constrained due to limited visibility and proximity of other junctions. This together with the site's accessibility to public transport may mean a car free development will be desirable.**
- **Consideration of the wildlife corridor on site and development should contribute positively to the existing ecology, biodiversity, improve access to nature and its recreational function.**
- **Future development will mitigate potential noise and vibration from the nearby train tracks.**

- The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area

Risks

no significant risks identified

Design Principles

- Consistent with the site's identification as a wildlife corridor, the development is required to address existing ecology through good design.
- Buildings should mediate between the taller buildings on Matthews Close and the character of development along Forty Avenue and further to the north, however the site is not suitable for tall buildings of a significant scale.
- Sufficient set back from the railway lines will be required to assist in mitigating against potential adverse impacts of train movements/engineering works.

Infrastructure Requirements

- Green/blue and sustainable infrastructure should be part of the development process and the development.
- Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.

Justification

London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, in particular through the redevelopment of sites around transport hubs.

Other recent developments opposite the railway sidings along Brook Avenue suggest that the site can be intensified to provide a mixed-use scheme with a significant number of new dwellings.

The site has good access to public transport and local infrastructure including shops and green spaces.

Justification: Factual update. New policy separated from BCSA7 for Clarity.

I/A Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Post hearing	0	+	++	++	++	++	++	0	+	0	0	-	0	?	0	0	+	+	+	-

Explanation of post-hearing scoring: The site is within 100 metres of a London Strategic Area for Regeneration and should provide the area with an uplift in housing of approximately 100 dwellings. The site is also within an area associated with high levels of crime and redevelopment could therefore help improve feelings of safety. The site is within close proximity to Wembley town centre and therefore has access to a wide range of essential facilities including healthcare, schools, and sporting facilities. The site has a good PTAL of 4, reducing associated traffic and air pollution. There are minor surface water flooding concerns on site which will be easily remedied through mitigation techniques such as the incorporation of SUDS and soft landscaping. The site currently consists of unused railway sidings and would benefit from redevelopment.

Overall the site has scored positively against social criteria. Positive impacts are anticipated due to the delivery of housing in an area with a good PTAL and good accessibility to a range of essential infrastructure, helping direct investment near a London Strategic Regeneration Area associated with high levels of crime. Mixed effects are predicted against environmental criteria with most impacts being neutral. The site scores negatively against air quality as it is within an Air Quality Management Area (AQMA). The majority of the borough is within an AQMA. New development can help to improve air quality by increasing tree planting; being designed to modern sustainability standards which reduces energy usage and emissions; and being located so as to reduce the reliance on personal vehicles. This will also serve to reduce concern over flooding by increasing permeability and incorporating other necessary mitigation measures such as SUDS. In summary, the negative impacts can be mitigated and wider sustainability benefits achieved.

5.2 East Place

Policy BP2 East

Policy and modifications:

Character, heritage and design:

- c) Along the intensification corridors of A5 Edgware Road and A4088 Blackbird Hill/Neasden Lane/ Dudden Hill Lane heights typically of up to 15 metres (5 storeys) are likely to be acceptable. Within Neasden town centre ~~this will be 6~~ **5** storeys **will also be appropriate.**

Homes:

- e) **Minimum of 5,400 additional homes in the period to 2041**, the potential residential development for Staples Corner Growth Area **(with around 2,200 dwellings)** and Neasden Stations’ Growth Area **(with around 2,000 dwellings)** will be determined by their respective masterplans, taking account of the need to support additional employment **industrial** space on site. Depending on the capacity of these sites there may be specific requirements around different housing types, such as specialist (older people/ supported/ student) housing and build to rent

Town Centres:

- ji) **Provide up to 500 sqm comparison goods retail floorspace, and 200 sqm convenience foods retail floorspace by 2028. This should be directed toward Neasden town centre.**

Community and cultural facilities:

- k) ~~Securing sufficient physical and social infrastructure on and off site to support the~~ **Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at** Staples Corner and Neasden Stations’ Growth Areas, ~~in particular~~ **and** ensuring the improvement of the Welsh Harp and its setting.

Supporting the local economy:

- m) Retaining and encouraging intensification of ~~employment~~ **light industrial, general industrial and storage and distribution** uses at Kingsbury Locally Significant Industrial Site.

Justification: To provide consistency with Local Plan (Policy BD2) and London Plan with regards to heights, and the housing trajectory with regards to area housing capacity. Consistency with London Plan and need to provide essential infrastructures in accordance with evidence base identified needs.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	++	++	+	+	0	++	++	++	-	+	+/-	+	+	+	0	0	+	+	+	++	+	++	++	+

Post hearing	++	++	++	+	0	++	++	++	-	+	+/-	+	+	+	0	0	+	+	+	++	+	++	++	+
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Submission stage amendments:

- Change from intensification of “employment” to “light industrial, general industrial and storage and distribution” to reflect the proposed change to policy. No change. The IIA Objectives do not refer to particular job types / business types.
- Addition of reference to provision of new education, health and cultural facilities. Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area. Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area. Change S2 from “minor positive” to “significant” due to provision of new health facilities in a large area. Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area

Explanation of post-hearing scoring: It is anticipated that the stronger emphasis on housing delivery within this place will help achieve a higher rate of delivery, thus making housing more accessible to all. It is not anticipated that criterion EN6 (townscape) is significantly impacted by the reduction in heights proposed for town centres from 6 to 5 storeys. The explicit reference to the delivery of retail floorspace is likely to increase the accessibility of certain uses, and the viability of local centres with increased footfall. Although positive, the relevant scoring criteria (S7) is already at the maximum due to the delivery of other such facilities within the wording of the policy. It is considered that these positive impacts will be felt across all protected characteristic groups as the proposed infrastructure will be made accessible to all.

New Policy BEGA1A (Neasden Stations Growth Area)

Policy and modifications:

Policy BEGA1A Neasden Stations Growth Area

The area around the existing Neasden underground station and a potential West London Orbital overground station will be transformed. In addition to around 2000 homes, the area will through co-location of industrial and other commercial floorspace, provide a major boost to business and employment opportunities. This will deliver a new varied supply of neighbourhood friendly modern industrial premises, studios and managed workspaces for local business needs as well as other commercial space to support a mixed use community. Space will be provided for and the development will integrate with a potential new West London Orbital Station accommodated adjacent to Neasden Lane.

Tall buildings will be located close to the stations and along the south of the underground line whilst reducing in scale towards its residential edges.

All developments will achieve the highest design standards. Energy efficient buildings using renewable energy and a district heating system will be delivered. Development will be supported by associated infrastructure which will be further drawn out by a masterplanning exercise including:

- **Improvements to the public realm, cycling and walking routes along Neasden Lane between the two stations and the Church End and Neasden town centres;**
- **Provision of new public open spaces and improvements to the quality and accessibility of those existing such as on Dudden Hill Lane;**
- **A series of play areas within new developments and open space;**
- **Improvements to Neasden station’s accessibility and capacity.**

5.2.31 The area around Neasden station has a high level of public transport accessibility. This could increase further with the provision of an additional station. This potential station has been identified as part of the West London Orbital scheme, which is a TfL supported infrastructure project. If successful in attaining funding, this will be delivered during the lifetime of the Local Plan. The existing industrial sites around the station have relatively few landowners/ occupiers and are not as intensively used as their accessible location warrants. There is the opportunity to improve efficiency of use through retaining an industrial use with the provision of a range of replacement industrial premises co-located with residential properties consistent with London Plan policies. The proposed relocation of the College of North West London to Wembley, provides the opportunity for regeneration of a scale of area to be identified and planned as a Growth Area.

5.2.32 The area will be subject to a comprehensive masterplan approach which will be led by the Council. This will involve input from landowners, site occupiers, local residents and other relevant parties, such as TfL, at the appropriate time. It will provide further detail on how development can address the wide variety of potentially competing needs, including: needing to provide sufficient industrial floorspace consistent with London Plan policies and Brent’s local needs to provide additional floorspace across the borough that can sit alongside a substantial amount of dwellings; creating a positive residential environment on sites in close proximity to railway infrastructure and main roads; providing suitable levels of greenspace and social infrastructure to meet residents’ needs and reflecting the gateway status of the area around the station, whilst providing a positive relationship with the lower scale suburban residential surroundings that will remain.

Justification: To provide consistency with format of policies for other Growth Areas in the Plan.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
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Post hearing	+	+	+	+	+	+	++	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+
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Explanation of post-hearing scoring: Social impacts are considered to be predominantly positive. The policy proposes the delivery of around 2000 new homes, supported by social and physical infrastructure. This will help reduce social exclusion, increase health and wellbeing and contribute towards providing everybody the opportunity to live in a home which is suitable to their identified needs. Mixed used regeneration and revitalisation of the local centre will use the highest standards of urban design, which will change the perception to a busy, thriving, safe and secure neighbourhood, which will enhance community safety. Improvements to Neasden Station accessibility will also assist those with physical disabilities using the site.

Environmental impacts are considered to be predominantly positive. The policy proposes the provision of new Open Space and children’s playspace, including the enhancement of existing spaces, and increased greening through tree planting. The delivery of the proposed West London Orbital will also serve to increase patronage on public transport, reducing the likelihood of people using personal vehicles for travel.

Economic impacts are considered to be predominantly positive, with redevelopment of industrial sites for co-location to secure investment in new industrial and other commercial floor spaces to provide a thriving mixed use community will encourage both indigenous and inward investment within the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. The improved accessibility to the station in particular which currently has no lift will be beneficial to those with a mobility disability, older people and pregnancy and maternity groups, again related to mobility.

In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Neasden Stations Growth Area.

New Policy BEGA2A (Staples Corner Growth Area)

Policy and modifications:

Policy BEGA2A Staples Corner Growth Area

The Staples Corner Strategic Industrial Location will be transformed. In addition to around 2,200 homes, the area will through industrial intensification together with co-location of industrial provide a major boost to business and employment opportunities through increased floorspace. This will deliver new varied supply of modern industrial premises, studios and managed workspaces for London’s strategic needs and local business needs as well as other commercial space and social infrastructure to support a mixed use residential community.

Working closely with LB Barnet and the Greater London Authority, the Council will seek to as best possible link it with and complement the Brent Cross Opportunity Area. It will also maximise the potential of the area to benefit from improved public transport connectivity to Central London and beyond provided by the new Brent Cross West Thameslink station and the potential West London Orbital.

The potential for tall buildings will be considered taking account of the need to respect views from Golders Hill through to Harrow on the Hill and not have a detrimental impact on the Brent Reservoir Site of Special Scientific Interest, reducing in scale towards its residential and open space edges.

All developments will achieve the highest design standards. Energy efficient buildings using renewable energy and a district heating system will be delivered. Development will be supported by associated infrastructure which will be further drawn out by a masterplanning exercise including:

- Improvements to the public realm, cycling and walking routes along and across the North Circular Road and the Edgware Road;
- Provision of three pocket parks and a series of open spaces and improvements to the quality and accessibility of those existing such as Neasden recreation ground and the Brent Reservoir/Welsh Harp;
- A series of play areas within new developments and open space.

Add justification text after policy to read:

- 5.2.33 Staples Corner is a Strategic Industrial Location that plays an important part in meeting for industrial needs, but could perform much better. As a gateway to Brent from wider London, or those coming from further afield from the M1 in townscape terms it presents a poor initial impression of the borough. Although there are some relatively modern fit for purpose premises, many are older poor quality buildings that have received little investment. The area also includes many quasi-retail and other non-industrial uses that reasonably could be located elsewhere, allowing a focus on more strategic industrial needs. In addition, the strategic road network is heavily trafficked and engineered as an 'urban motorway' forming a significant barrier to pedestrian and cyclist movements. Positive recreational and ecological features such as Neasden Recreational Ground and the Welsh Harp/Brent reservoir Site of Special Scientific Interest are also hidden from view, with limited access points.
- 5.2.34 On the other side of the Edgware Road in the London Borough of Barnet is the Brent Cross Opportunity Area. 'Brent Cross Town' will be a mixed use area providing a residential community of around 6,700 homes with associated social infrastructure and other features such as 275,000 m² of office floorspace, business facilities for 25,000 employees, other commercial leisure, 14,000m² of indoor sports facilities and 20ha of parks.
- 5.2.35 The opening of the new Brent Cross West Thameslink Station in 2022 will improve public transport connectivity to central London and beyond. Potential West London Orbital services will further improve connections to west London and beyond. Staples Corner which has similar characteristics

to Brent Cross Opportunity Area shows that potential that exists as an employment area, but also to provide additional new homes to meet the Borough's and London's needs.

- 5.2.36 The area will be subject to a comprehensive masterplan approach which will be led by the Council. This will involve input from landowners, site occupiers, local residents and other relevant parties, such as TfL, at the appropriate time. It will address how the area can better work in the future. This will seek to improve the amount and quality of industrial floorspace through intensification of sites consistent with London Plan and local plan policies, freeing up land for residential, but also potentially through co-location of industrial and residential uses in a transitional zone between the two predominate uses. It will identify the amount and location of potential dwellings, together with where intensification of industrial uses and the types of industrial uses, and the transition between the two will be considered as part of that process.
- 5.2.37 The Council is identifying the location as a Growth Area due to the scale of the opportunity. Given the need to maximise efficient use of land the area has been identified as a Tall Buildings Zone. This reflects the potential scale of development to create clusters and other characteristics of the area, plus the surrounding context of tall buildings being delivered to the north as part of the Hendon estate redevelopment and also as part of Brent Cross. The height and location of development will be considered as part of the masterplan taking into account local protected views from Golders Hill to Harrow on the Hill and seeking to not have an adverse impact on the birds in particular that support the protected status ecological designations of the Welsh Harp/Brent Reservoir.
- 5.2.38 As part of the masterplanning the amount of necessary social infrastructure together with other uses to support the new residential community will also be identified, as well as potential enhanced links to the new station, across the North Circular and Edgware Roads and access to and improvements to the extensive open spaces to the north.
- 5.2.39 The size and complicated nature of the area plus the need to engage with occupiers, landowners and other organisations with an interest in the area will mean an effective masterplan will require some time to finalise. As such no reliance has been placed on the site in meeting housing needs in the first half of the plan period.

Justification: Insert new policy after BEGA1A. To provide consistency with format of policies for other Growth Areas in the Plan.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Post hearing	+	+	+	+	+	+	+	+	-	0	-/	+	+	+	0	+	+	+	?	+	+	+	+	+

Explanation of post-hearing scoring: Social impacts are considered to be predominantly positive. The policy proposes the delivery of around 2200 new homes, supported by social and physical infrastructure. This will help reduce social exclusion, increase health and wellbeing and contribute towards providing everybody the opportunity to live in a home which is suitable to their identified needs. Mixed used regeneration and revitalisation of the local centre will use the highest standards of urban design, which will change the perception to a busy, thriving, safe and secure neighbourhood, which will enhance community safety.

Environmental impacts are considered to be predominantly positive. The policy proposes the provision of new Open Space and children's playspace, including the enhancement of existing spaces, and increased greening through tree planting. The delivery of the proposed West London Orbital will also serve to increase patronage on public transport, reducing the likelihood of people using personal vehicles for travel.

Economic impacts are considered to be predominantly positive, with redevelopment of industrial sites for co-location to secure investment in new industrial and other commercial floor spaces to provide a thriving mixed use community which will encourage both indigenous and inward investment within the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity.

In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the Staples Corner Growth Area.

Policy BEGA1 (Neasden Stations Growth Area)

Policy and modifications:

Allocated Use

Growth Area – ~~Strategic Industrial Location and~~ Locally Significant Industrial Sites subject to co-location and intensification, new passenger railway line infrastructure and residential development.

Planning considerations:

- ~~The~~ **Growth Area** will be ~~is~~ subject to a masterplan process to comprehensively identify how ~~the area~~ **it** can best maintain and ideally increase above a **minimum** plot ratio of 0.65, for the current ~~SIL and LSIS sites' employment~~ **industrial** floorspace (predominantly light industrial, **general** industrial and storage and distribution), plus relate to and provide sufficient space to accommodate the new and existing transport infrastructure as part of a new mixed use community.
- ~~None of the site is within Flood Zone 3 for fluvial flooding.~~ Parts are however in **surface water Flood** Zone 3 for surface water, much of this is highway land or the rail corridors, although **it includes** the industrial land south of Neasden station ~~is also susceptible~~. As such a sequential approach to location

of uses and buildings will be required on these sites to ensure that the **no unacceptable** risk of flooding on and off site is not unacceptably increased. More detailed assessment will be required through a site specific flood risk assessment. **Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.**

Justification: To make consistent with national policy in regards to flooding. Reflect spatial designations and align terminology with London Plan.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a EN11	a EN12	b EN12	c EN12
Submission	++	+	++	++	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	-
Post hearing	++	+	++	++	++	++	+	0	+	!	0	!	0	?	0	0	+	+	+	-

Submission stage amendments:

- Clarification that site comprises LSIS rather than SIL and LSIS. No overall change in gain or loss of employment space so no change to ratings.
- Change in terminology from ‘employment’ to ‘industrial’. No overall change in gain or loss of employment space so no change to ratings.

Explanation of post-hearing scoring: The site includes an existing waste use. As such criterion EN2a has been updated to reflect this, acknowledging the fact that living within close proximity to noisy, smelly, and otherwise disruptive uses can negatively impact upon receptors. Redevelopment of this site will likely require the re-provision of an equivalent waste site elsewhere within the local area, at a less disruptive location, and as such, is unlikely to be of impact should the site be delivered for residential uses. Other implications consider criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed.

Policy BEGA2 (Staples Corner Growth Area)

Policy and modifications:

Planning considerations:

- It will be subject to a masterplan process **undertaken between Brent, Barnet and the GLA. This will** to comprehensively identify how the area can best maintain and ideally increase useable **employment industrial** floorspace (predominantly light industrial, **general** industrial and storage and distribution). **This will** representing a **minimum** 0.65 plot ratio or replacement of the existing amount of **employment industrial** floorspace, whichever is the greater, whilst potentially providing a new mixed use community.
- The northern edge is adjacent to Welsh Harp and Neasden Recreation Ground, these have a variety of designations including Metropolitan Open Space, **Brent Reservoir** Site of Special Scientific Interest, Site of Nature Conservation Grade I and Local Nature Reserve. The Canal and River Trust have been working with the Brent Catchment Partnership on reducing pollution and invasive species and for it to become an attraction to Brent’s population of being by water. **Natural England have also identified, given the ecological status of the area, the need to protect the SSSI particularly with regards to potential disturbance from visitor recreational activities.** As such, the Masterplanning also needs to consider the extent to which the potential of this area as a recreational and environmental asset can be enhanced in association with the Staples Corner Growth Area. ~~Natural England have indicated that the height and position of buildings should not adversely impact on the flightpaths and behaviours of breeding wetland birds.~~
- ~~None of the site is~~ **When taking account of climate change a small part is** within **fluvial** Flood Zone 3 for fluvial flooding. Parts are however in **surface water** zone 3 for surface water, principally although not exclusively this is within highway land. **Appropriate site specific flood risk assessments will need to be undertaken in these locations to ensure no unacceptable risk of flooding on and off-site.**

Justification: Consistency with national policy with regards to flooding, and consideration of representations from Natural England on SSSI. Align terminology with London Plan.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a EN11	a EN12	b EN12	c EN12
Submission	0	+	++	+	++	-	++	0	-	0	+	-	-	?	0	0	+	0	0	-
Post hearing	0	+	++	+	++	-	++	0	-	0	+	-	-	?	0	0	+	0	0	-

Submission stage amendments: Change in terminology from ‘employment’ to ‘industrial’. No overall change in gain or loss of employment space so no change to ratings.

Explanation of post-hearing scoring: No change. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed. With regards to SSSI impact reference, this was taken into consideration at submission stage under slightly different wording which is likely to result in the same considerations/outcomes.

Policy BESA1 (Coombe Road)

Policy and modifications:

Indicative Capacity
 3886 sqm **light industrial and storage and distribution** B1-B8 on the existing **local** employment sites (~~0.5 plot ratio~~) and 400 sqm **retail or takeaway** A1-A5 uses/**light industrial and storage and distribution** B1-B8 on the McDonalds site (replacement of existing floorspace, with potential for more employment), plus 194 dwellings.

Planning considerations:

- Parts of the site fall within fluvial flood zone 3. ~~It also is~~ **All the site has** a residual risk of reservoir flooding should a defence failure occur. A site specific Flood Risk Assessment will be required and a sequential approach to the local **location** of uses followed. **Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.**
- Provision of industrial floorspace as part of a mixed use development should be maximised through a design led approach and viability testing. ~~At the very least a replacement of the existing floorspace on individual sites that come forward, or a plot ratio of 0.65 whichever is the greatest will be required.~~
- **Replacement of the existing McDonalds or provision of alternative town centre uses on this part of the site consistent with the size and role of the retail parade, will be supported.**

Justification: Consistency with national policies with regards to flooding, and to provide clarity about re-provision of existing use to encourage redevelopment, including consistency with policy BE3.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11 ^a	EN12 ^a	EN12 ^b	EN12 ^c
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Submission	++	+	++	++	++	++	+	0	0	0	+	--	-	?	0	0	+	-	-	+
Post hearing	++	+	++	++	++	++	+	0	0	0	+	--	-	?	0	0	+	-	-	+

Explanation of post-hearing scoring: No change. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed. With regards to re-provision of town centre uses, although this is likely to help encourage development, it is not anticipated that it will ultimately impact upon the final site outputs with regards to the sustainability criteria. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BESA2 (Cricklewood Bus Depot Edgware Road)

Policy and modifications:

Planning considerations

- The site is a Locally Significant Industrial Site. Any proposal must ensure the replacement of the bus depot, or if **An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.** If operationally this is not required, provision of industrial floorspace as part of a mixed use development should be maximised through a design led approach and viability testing.

Justification: Clarification regarding re-provision of essential infrastructure.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c
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Submission	0	+	++	++	0	++	+	0	0	0	0	--	-	?	0	0	+	+	+	-
Post hearing	0	+	++	++	0	++	+	0	0	0	0	--	-	?	0	0	+	+	+	-

Submission stage amendments: No overall change in gain or loss of employment space so no change to ratings.

Policy BESA3 (5 Blackbird Hill)

Policy and modifications:

indicative homes 3057

Justification: To make consistent with updated housing trajectory.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	+	+	+	+	++	0	+	+	0	0	0	!	-	+	0	0	++	+	.	+
Post hearing	+	+	+	+	++	0	+	+	0	0	0	!	-	+	0	0	++	+	.	+

Explanation of post-hearing scoring: No change. Implications only regard criterion S3a (housing). The site still delivers between 10 & 99 homes.

5.3 – North Place

Policy BP3 North

Policy and modifications:

Homes:

d) **Minimum of 2,800 additional homes in the period to 2041, principally through the** continued residential development within the Burnt Oak and Colindale Growth Area (**around 2,100 homes**). The potential residential development for the extension of the Burnt Oak and Colindale Growth Area, referred to as Capitol Valley, will be determined by a masterplan, taking into account the need to intensify employment **industrial** use on the site.

Town Centres:

k) Provide up ~~to 4,400 sqm of net comparison goods floorspace, up to 3,600 sqm~~ **1,600 sqm** of net convenience foods **retail** floorspace, up to **5200** sqm ~~class A3~~ **cafe/ restaurant** floorspace and ~~2100 sqm class A4~~ **drinking establishment** floorspace by 2028. This floorspace should be directed towards the three town centres.

Community and cultural facilities:

m) **Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at** ~~Secure sufficient physical and social infrastructure on and off site to support an increase in population at~~ Burnt Oak and Colindale

Justification: To provide clarity on strategic housing delivery numbers across the Places, make consistent with Local Plan and London Plan policies. Better address social infrastructure needs, new UCO and the Retail and Leisure Needs study (EB_E_06). Include requirement for essential infrastructures to reflect need identified within evidence base.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	++	++	+	+	0	+	++	+	-	0	+/-	+	+	+	0	0	+	+	?	++	+	++	++	+
Post hearing	++	++	++	+	0	+	++	+	-	0	+/-	+	+	+	0	0	+	+	?	++	+	++	++	+

Submission stage amendments: Addition of reference to provision of new education, health and cultural facilities. Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area. Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area. Change S2 from “minor positive” to “significant positive” due to provision of new health facilities in a large area. Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area.

Explanation of post-hearing scoring: It is anticipated that the stronger position on delivery of homes in the area will help promote the delivery of more homes overall, including affordable homes, thus increasing criterion S3. The delivery of non-residential floorspace has already been integrated within the submission version of this assessment, and it is not foreseen that the increased quantum will significantly increase the impact upon economic criteria. It is considered that these positive impacts will be felt across all protected characteristic groups as the proposed infrastructure will be made accessible to all.

Policy BNGA1 (Burnt Oak and Colindale Growth Area)

Policy and modifications:

The existing Locally Significant Industrial Sites will be subject to masterplanning with a view to its regeneration to re-provide updated employment **industrial** floorspace that meets employers existing and future needs, through co-location with other uses.

Burnt Oak/ Colindale Growth Area will deliver over **2,9100** new homes to 2041, supported by social and physical infrastructure to include:

- Improvements to the quality and accessibility of existing local open spaces
- A series of play areas within new developments and open space, **including a 0.2ha pocket park, and improvements to existing open space**
- **The creation of informal recreation and good quality public realm**
- Improved cycle infrastructure along the A5

Justification: Reflect the housing trajectory and associated site capacities within the area, and infrastructure needs assessments such as the Open Space and Leisure Needs Assessment.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
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Submission	+	+	+	+	0	0	+	+	-	0	+/-	+	+	+	0	0	+	+	?	+	+	+	0	+
Post hearing	+	++	+	+	0	0	+	+	-	0	+/-	++	+	+	0	0	+	+	?	+	+	+	0	+

Explanation of post-hearing scoring: It is anticipated that the delivery of additional open space facilities will increase both criteria’s S2 (health and wellbeing), and EN5 (biodiversity). New parks are likely to increase people’s mental and physical well-being, as well as providing places of refuge for biodiversity. The policy also includes an increased quantum of housing delivery within the area (+100). This is already significant, with the additional housing to be delivered in the area not being seen as sufficient so as to move the scoring on the SA criteria (S3). It is considered that these positive impacts will be felt across all protected characteristic groups as the proposed infrastructure will be made accessible to all.

Policy BNSA1 (Capitol Way Valley)

Policy and modifications:

Timeframe for delivery
0-5 years 5-10 Years 10+ Years
14201 300 686599

Justification: Reflect changes to housing trajectory and consistency with policy BE3 on employment land (amendments not explicit within policy, however reflects wider strategic approach and designation of on-site Local Employment sites).

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 ^a	EN1 ^a	EN2 ^a	EN3 ^a	EN4 ^a	EN4 ^b	EN4 ^c	EN5 ^a	EN7 ^a	EN1 ^{1a}	EN1 ^{2a}	EN1 ^{2b}	EN1 ^{2c}
Submission	-	+	++	++	0	++	++	0	-	0	0	-	!	?	0	0	+	+	+	-
Post hearing	-	+	++	++	0	++	++	0	-	0	0	-	!	?	0	0	+	+	+	-

Explanation of post-hearing scoring: No change. Amendments to capacity regard timeframe and correct typo only. Full capacity already considered at Submission stage IIA and as such no impact to scoring for criterion S3a. It is anticipated that the delivery of additional open space facilities will increase both criteria’s S2 (health and wellbeing),

and EN5 (biodiversity). New parks are likely to increase people’s mental and physical well-being, as well as providing places of refuge for biodiversity. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BNSA2 (Colindale Retail Park, Multi Storey Car Park, and Southon House)

Policy and modifications:

<p>Allocated Use Mixed use development to include residential, retail and employmentreplacement industrial and office space/affordable workspace.</p> <p>PTAL Rating The PTAL rating of the site varies from 2-34. The majority of the northern and southern part is within PTAL rating 2, with the central part achieving PTAL rating 3-4 2-4 (current and 2031 estimate)</p>
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Justification: Reflect correct PTAL score, and London Plan terminology.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c
Submission	-	+	++	++	0	++	-	0	0	0	0	!	-	?	0	0	+	+	+	-
Post hearing	-	+	++	++	0	++	-	0	0	0	0	!	-	?	0	0	+	+	+	-

Submission stage amendments:

- With regards to PTAL: no change as still a neutral rating.
- No overall change in gain or loss of employment space so no change to ratings (S3A).

Policy BNSA4 (Former Mecca Bingo Site)

Policy and modifications:

Indicative Capacity
~~Unknown~~—will require detailed assessment as part of planning application.**50 dwellings**

Infrastructure requirements:
Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.

Justification: To Align with housing trajectory. To reflect Thames Water requirements regarding capacity of existing infrastructure.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	-	++	+	++	++	-	0	+	0	0	!	0	+	0	?	++	+	+	+
Post hearing	-	-	++	+	++	++	-	0	+	0	0	!	0	+	0	?	++	+	+	+

Explanation of post-hearing scoring: No change. Implications only regard criterion S3a (housing). The site still delivers between 10 & 99 homes. Reference to need for water infrastructures of no impact as no relevant criteria.

Policy BNSA8 (Queensbury Underground Station Car Park)

Policy and modifications:

Active frontage sought along ground floor of Turner Road. **Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'.**

Justification: Consistent with evidence base to ensure safe development.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a EN11	a EN12	b EN12	c EN12
Submission	-	-	+	+	++	+	-	0	0	0	0	-	0	+	0	0	+	+	+	!
Post hearing	-	-	+	+	++	+	-	0	0	0	0	-	0	+	0	0	+	+	+	!

Explanation of post-hearing scoring: No change. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed.

5.4 – North West

Policy BP4 North West

Policy and modifications:

Homes:

- d) **Minimum of 3,300-2,285 additional homes in the period to 2041, principally through the Providing approximately 2,600 new homes as part of development within the Northwick Park Growth Area (around 2,600-1,600 net additional homes), including specialist accommodation to meet identified demand.**

Town Centres:

- f) ~~Supporting the creation of new~~ **Provide up to 900 sqm comparison goods retail floorspace, 500 sqm convenience goods retail floorspace, 100 sqm café and restaurant floorspace, and 100 sqm of drinking establishment floorspace. This should be directed toward** ~~within~~ Preston Road and Kenton **town** centres providing that they are of an appropriate scale, to support their local function **by 2028**

Community and cultural facilities

Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at ~~As part of the development within the~~ Northwick Park Growth Area **where** the following improvements to community and cultural facilities should be achieved:

- e) Redeveloped and/or enhanced university hospital
- f) Redeveloped and/or enhanced university facilities
- g) Enhancements to Northwick Park Sports Pavilion
- h) Improved setting of and better integration of open space within the site to Northwick Park

Justification: Provide clarity on strategic housing delivery numbers across the Places, reflect new capacity for BNWGA1, reflect the Retail and Leisure Needs study (EB_E_06), social infrastructure needs, changes to Use Class Order and align terminology with national policy as sought by Sport England.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	++	++	+	+	0	0	++	+	-	0	+/-	+	+	+	0	0	+	++	?	+	+	+	++	+
Post hearing	++	++	+	+	0	0	++	+	-	0	+/-	+	+	+	0	0	+	++	?	+	+	+	++	+

Submission stage amendments: Addition of reference to provision of new education, health and cultural facilities. Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area. Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area. Change S2 from “minor positive” to “significant positive” due to provision of new health facilities in a large area. Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area. *Justification:* Align with housing trajectory, and with Retail and Leisure Needs Study.

Explanation of post-hearing scoring: No Change. Although the number of homes being delivered has changed, it is still significant, and therefore the reduction is considered not to impact related criteria to warrant change. Again, although specific quanta of non-residential floorspace have been identified, they are not significant when considering existing quantities in the locality, and the provision of some additional space was broadly included within the policy in the first instance.

New Policy BNWGA1A (Northwick Park Growth Area)

Policy and modifications:

Insert new policy after para 4.4.43 to read:

Policy BNWGA1A Northwick Park Growth Area

The Northwick Park site will undergo major regeneration, making the best use of land in this highly sustainable location. This will provide a mix of uses, helping to create a self-sustaining community with a sense of place, including around 1,900 new homes (net addition around 1,600 homes). Development will maximise the delivery of affordable housing, and will see the existing key workers rehoused on site in more suitable and modern dwellings. Delivery will include a high proportion of family dwellings in addition to purpose built student accommodation in association with the on-site university facilities.

Although subject to transformational change, the scale of development will need to respond positively to its surrounding context, particularly with regards to building heights. Development will integrate strongly with the adjacent Metropolitan Open Land, providing green fingers which help to bring the park into the development.

Funding generated as a result of the development will be reinvested into the existing on-site infrastructure, including the Northwick Park Hospital, and the University of Westminster Harrow campus. This will serve to enhance existing facilities through renewal, and the addition of complementary uses such as new medical, community and sporting facilities. Access to the site will be improved, through a new Watford Road junction and the adjacent Northwick Park London Underground station being made more prominent and accessible to all users. Supporting infrastructure associated with new housing development will be drawn up in a forthcoming masterplan, and as a minimum will include:

- **A new flexible retail offer adjacent to Northwick Park station which will serve to meet local needs;**
- **A new nursery capable of meeting existing needs, and those arising from new development;**

- **A range of multi-purpose green spaces which seek to enhance the biodiversity of the surrounding area whilst providing new play space for children, including 2 new 0.2ha pocket parks;**
- **Improvements to site accessibility, prioritising funding toward the most sustainable modes of transport;**
- **On site combined heat and power centre which will provide a network for surrounding major development, including potentially those at Harrow-on-the-Hill;**
- **And enhancements to existing on-site infrastructure which serves the wider area and that of Greater London.**

Insert new justification text after policy to read:

- 5.5.1 The Northwick Park Growth Area is coming forward under the Governments One Public Estate (OPE) scheme, via the Northwick Park Partnership which includes all landowners, including the Council, Network Homes, National Health Service (HNS), and the University of Westminster. Together under the OPE scheme, the site will see the greater utilisation of land for residential development. This will help support the further delivery of essential large scale on-site infrastructures, including those which support and enhance the hospital and university functions.
- 5.5.2 The site is well connected, being adjacent to a range of public transport facilities, achieving a peak PTAL rating of 6a to 2031. This includes immediate proximity to Northwick Park LUL which includes the Metropolitan line to central London, Watford and west London, and Kenton LUL (a 5 minute walk) which includes the Bakerloo and Overground lines. There are also a number of buses which pass through the site, providing access in and around the local residential areas and serve access to the hospital.
- 5.5.3 The site is also adjacent to a significant amount of green infrastructure, including Northwick Park Metropolitan Open Land, Ducker Pool, Northwick Park golf course, and Harrow School playing fields. These areas include a number of Sites of Importance for Nature Conservation (SINC), and provide the opportunity to enhance these areas for both nature and recreation harmoniously.
- 5.5.4 The site is within close proximity to Kenton town centre which will enable residents to meet their wider needs. The site is somewhat detached from this area, and should therefore have on-site provision which will better enable occupants to meet their day-to-day needs using sustainable transport modes. The range of needs addressed on site will need to reflect the scale of development, and the types of residents (such as families and students), which are likely to occupy the site as a result of the housing delivered and its location.

Development will need to have strong consideration of development in the adjacent London Borough of Harrow. In particular, this will involve the potential linkages with the major development generated within the Harrow and Wealdstone Opportunity Area to the north, which has been identified in the London Plan as having the potential to deliver 5,000 new homes, and 1,000 new jobs. Specifically, development of any on-site energy centre will need to assess the potential for connection with this opportunity area.

Justification: New Growth Area policy and justification text to make consistent with how growth areas are addressed in the Plan.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Post hearing	+	++	++	+	0	0	++	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	++	0	+

Explanation of post-hearing scoring: Social impacts are considered to be positive. The delivery of around 1900 new homes will contribute towards the overall housing numbers required to provide everybody with an opportunity to live in a home which is suitable to their identified needs. Provision of new play areas and open space will contribute towards health and wellbeing. The local infrastructure will become more accessible by new increasing local occupancy, and by improving access arrangements from Northwick Park LUL station.

Environmental impacts are considered to be positive. Seeking to reduce car usage and improve the local public realm and open space, including urban greening, will contribute towards environmental health and supporting an attractive and clean environment, enhancing the borough’s landscape and townscape. Reduced car dependency will also contribute towards improved environmental health and mitigate against climate change. Creating a sense of place through quality design that compliments the existing heritage of the area will also enhance the borough’s landscape and townscape. The potential delivery of a district heating system will also contribute toward environmental benefits.

Economic impacts are considered to be positive. Proposed new commercial and employment uses will contribute towards employment opportunities and help to promote sustainable, resilient and inclusive economic growth. Returns from investment into housing will enable the public bodies within the Northwick park partnership to help improve essential local infrastructures. This will help to facilitate both indigenous and inward investment in the borough.

Due to the policy being of benefit to all residents, it is considered that there will be a positive impact on the following groups: age, sex, sexual orientation, gender reassignment, disability, religion and belief, ethnicity, marriage and civil partnership, pregnancy and maternity. The development will also result in the improvement of access to Northwick Park LUL station, which will include enhancements that will benefit the disabled with mobility issues, older people who may not necessarily be defined as disabled and the pregnancy and maternity groups who will also benefit from improved mobility/accessibility.

In conclusion, the policy will result in positive economic, social and environmental impacts that will ensure that good growth takes place in the North west area of Brent.

Policy BNWGA1 (Northwick Park Growth Area)

Policy and modifications:

Indicative Capacity

Capacity for circa ~~3,600-1,920~~ units, of which ~~2,600-1,585~~ net additional, development capacity will be better identified through a more detailed masterplan process.

Planning considerations:

- Adjoining the Growth Area to the east and south is Northwick Park. ~~Designated as Metropolitan Open Land (MOL), which it is afforded the same protection as Green Belt in Policy G3 of the London Plan. Located within the boundary of Northwick Park is a sports pavilion. It is proposed that the sports pavilion is relocated, possibly to create an active frontage between the station and hospital, but the location could vary. This will also create a more open feeling across the park. Any MOL land swap as part of the relocation of the sports pavilion should ensure that there is no net loss of MOL area. The value of the land designated as MOL should also be improved, having regard to all criteria in Part B of London Plan Policy G3.~~
- There is potential for some tall buildings, subject to being a high quality design. These should respond to the height of the existing hospital buildings, stepping down towards the MOL and areas to the north. Consideration should also be given to impact on the locally protected views as identified in the Harrow Local Plans of Harrow (Country Park at Wood Farm setting corridor) and Barnet (Golders Hill Park toward Harrow on the Hill).

Justification: Align capacity with housing trajectory, revise position on previously proposed MOL land swap, and make reference to neighbouring borough protected views.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a EN11	a EN12	b EN12	c EN12
Submission	-	+	++	++	0	++	++	0	+	0	0	-	0	?	-	0	+	+	+	-
Post hearing	-	+	++	++	0	++	++	0	+	0	0	-	0	?	-	0	+	+	+	-

Explanation of post-hearing scoring: No change. Implications only regard criterion S3a (housing). The site still delivers 100+ homes. The initially proposed MOL land swap would have resulted in no net loss of MOL open space, as will the new policy wording. The views were previously referenced but not made specific, as such they would have been considered but have been specified for clarity.

5.5 – South Place

Policy BP5 South

Policy and modifications:

Homes:
e) <u>A minimum of 4,900 additional homes in the period to 2041.</u> Church End Growth Area, <u>providing over 1,300 new homes,</u> will be extended to include adjoining industrial sites and a masterplan produced to guide its improvement to a mixed use neighbourhood.
g) The Harlesden Neighbourhood Plan provides policies and guidance on sites for housing and mixed-use development in the Harlesden Neighbourhood Area. <u>A minimum 797 dwellings should be provided in the Harlesden Neighbourhood Plan Area in the period to 2041.</u>
Town centres:
h) Harlesden town centre’s retail and evening economy offer will be protected and enhanced. New convenience <u>and in the period to 2028 provide up to 4,800sqm of net comparison retail floorspace, and 900sqm convenience foods</u> retail floorspace. This will <u>should</u> be directed to <u>wards Church End and</u> Harlesden town centres.
Community and cultural facilities:
<u>m)(i) Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities.</u>

Justification: To provide clarity on strategic housing delivery numbers across the Places, Provide housing figure for designated neighbourhood plan areas as required by NPPF paragraph 65, and to align floorspace quanta with those recommended within table 2.1 of the Retail and Leisure Needs study (EB_E_06). To include requirement for essential infrastructures in accordance with the need identified in the Council’s evidence base.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
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Submission	++	++	+	+	0	+	++	+	-	0	+/-	+	+	+	0	+	+	+	+	+	+	+	++	+
Post hearing	++	++	++	+	0	+	++	+	-	0	+/-	+	+	+	0	+	+	+	+	+	+	+	++	+

Submission stage scoring: Addition of reference to provision of new education, health and cultural facilities. Change EC4 from “neutral” to “significant positive” due to provision of new educational facilities in a large area. Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area. Change S2 from “minor positive” to “significant positive” due to provision of new health facilities in a large area. Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area.

Explanation of post-hearing scoring: It is anticipated that the stronger emphasis on housing delivery within this place will help achieve a higher rate of delivery, thus making housing more accessible to all. The delivery of non-residential floorspace has already been integrated within the submission version of this assessment, and it is not foreseen that the increased quantum will significantly increase the impact upon economic criteria. The housing figures for the Harlesden Neighbourhood Plan have been included for consistency with national policy only, and are figures which the council considers are likely to arise as a result of the new positive position on small sites housing delivery, as well as identified site allocation capacity. This does therefore not represent a significant change from policy, but rather reflects our broad approach and as such is unlikely to varying scoring with regards to the sustainability appraisal criteria. It is considered that these positive impacts will be felt across all protected characteristic groups as the proposed infrastructure will be made accessible to all.

Policy BSGA1 (Church End Growth Area)

Policy and modifications:

Church End Growth Area will deliver ~~1,040~~ **over 1300** new homes to 2041, supported by social and physical infrastructure to include:

Justification: Consistency with the updated Housing Trajectory.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	+	+	+	+	+	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+

Post hearing	+	+	+	+	+	+	+	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+
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Explanation of post-hearing scoring: No change. Although increased housing delivery in this area, the previous delivery was significant and therefore unlikely to significantly impact sustainability criteria.

Policy BSSA1 (Asiatic Carpets)

Policy and modifications:

Indicative Capacity:
~~380~~**414**

Planning Considerations:
 Whilst the west of the site was in 2011 allocated for mixed-use light industrial/managed affordable workspace and residential, ~~the~~**The premises west of Dalmeyer Road are a local employment site, and the** east of this site all of this allocation is now designated as a Locally Significant Industrial Site (LSIS). Redevelopment will be consistent with London Plan policy E7 and Brent Local Plan policy BE2 and BE3. It will be subject to a masterplan-led approach, demonstrating comprehensive development will result in ~~a net increase in employment~~**overall industrial floorspace totalling the maximum viable that can be achieved from the existing local employment site**

Justification: Reflect figure in Housing Trajectory, and policy BE3 on employment floorspace reversion

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 ^a	EN1 ^a	EN2 ^a	EN3 ^a	EN4 ^a	EN4 ^b	EN4 ^c	EN5 ^a	EN7 ^a	EN1 ^{1a}	EN1 ^{2a}	EN1 ^{2b}	EN1 ^{2c}
Submission	++	+	++	++	++	++	+	0	0	0	0	!	.	?	0	0	+	+	+	.
Post hearing	++	+	++	++	++	++	+	0	0	0	0	!	.	?	0	0	+	+	+	.

Submission stage amendments: Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A). The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BSSA2 (B&M Home Store and Cobbold Industrial Estate)

Policy and modifications:

Planning Considerations:

- Designated a Locally Significant Industrial Site, consistent with London Plan policy E7 and Brent Local Plan policy BE2 redevelopment will be subject to a masterplan-led approach. This will demonstrate **ing** comprehensive development will result in **a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater. a net increase in employment floorspace, development of a high quality design and that any potential conflict between uses can be managed and mitigated and a high standard of amenity achieved.**

Justification: Reflect policy BE2 on Industrial floorspace re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c
Submission	++	+	++	++	++	++	+	0	0	0	0	!	.	?	0	0	+	+	+	.
Post hearing	++	+	++	++	++	++	+	0	0	0	0	!	.	?	0	0	+	+	+	.

Submission stage amendments: The approach taken toward industrial land intensification has changed toward one which requires a minimum re-provision of 0.65 plot ratio or re-provision of existing, whichever is greater. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already. This is a result of the sites existing intensive use, with redevelopment unlikely to affect the quantum of industrial floorspace significantly.

Policy BSSA4 (Chapman’s and Sapcote Industrial Estate)

Policy and modifications:

Indicative Capacity:
~~200~~**300**

Planning Considerations:

- The site is a designated Locally Significant Industrial Site. Consistent with London Plan policy E7 and Brent Local Plan policy BE2 redevelopment will be subject to a masterplan-led approach, demonstrating comprehensive development will result in **a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater.** ~~a net increase in employment floorspace, development of a high quality design and that any potential conflict between uses can be managed and mitigated and a high standard of amenity achieved.~~

Justification: Reflect figure in Housing Trajectory, and consistency with policy BE2 on industrial land re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 ^a	EN1 ^a	EN2 ^a	EN3 ^a	EN4 ^a	EN4 ^b	EN4 ^c	EN5 ^a	EN7 ^a	EN1 ^{1a}	EN1 ^{2a}	EN1 ^{2b}	EN1 ^{2c}
Submission	0	+	++	++	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	.
Post hearing	0	+	++	++	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	.

Submission stage amendments: No Change. Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A). The approach taken toward industrial land intensification has changed toward one which requires a minimum re-provision of 0.65 plot ratio or re-provision of existing, whichever is greater. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already. This is a result of the sites existing intensive use, with redevelopment unlikely to affect the quantum of industrial floorspace significantly.

Policy BSSA5 (Willesden Bus Depot)

Policy and modification:

Infrastructure requirements:

Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.

Justification: To reflect Thames Water requirements regarding capacity of existing infrastructure.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	+	++	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Post hearing	-	+	+	++	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+

Explanation of post-hearing scoring: Reference to need for water infrastructures of no impact as no relevant criteria.

Policy BSSA6 (Argenta House and Wembley Point)

Policy and modifications:

Indicative Capacity

540569

- Wembley Brook and River Brent are potential sources of flooding and the majority of the site is within Flood Zone 3. ~~Part of the site is within~~ **including extensive** flood zone 3b (functional floodplain). Development, other than water compatible uses, will not be acceptable within functional floodplain.

Any flood modelling from applicants which seeks to justify a revision to the functional floodplain boundary will need to be agreed by the Environment Agency.

- More vulnerable uses should be restricted to areas of lowest flood risk and on upper floors. Ground floors should be designed to be resistant and resilient to flood risk. Basement dwellings will not be acceptable on the site. **Development must be informed by a detail Flood Risk Assessment and Drainage Strategy, reduce flood risk overall and not increase the risk of flooding on adjoining sites. Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.**

Justification: To reflect housing trajectory and make consistent with national policy and address concerns raised by the EA.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	0	+	++	+	+	.	.	0	+	0	+	!	0	+	0	0	+	!	.	.
Post hearing	0	+	++	+	+	.	.	0	+	0	+	!	0	+	0	0	+	!	.	.

Explanation of post-hearing scoring: No change. Site still delivers over 100 homes and as such scoring is not affected. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed.

Policy BSSA7 (Bridge Park and Unisys Building)

Policy and modifications:

Planning considerations:

- It must be demonstrated that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction. **Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.**

Justification: To conform with national policy requirements regarding flooding.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	++	+	++	++	++	.	+	0	0	0	0	!	.	?	0	0	+	!	.	.
Post hearing	++	+	++	++	++	.	+	0	0	0	0	!	.	?	0	0	+	!	.	.

Explanation of post-hearing scoring: No change. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed.

Policy BSSA8 (McGovern's Yard)

Policy and modifications:

Comments:

- Consistent with policy BE3 ~~an increase in employment~~ **the maximum viable amount of industrial** floorspace will be sought as part of any redevelopment.

Justification: Consistency with policy BE3 on employment floorspace re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	+	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Post hearing	-	+	+	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+

Explanation of post-hearing scoring: No change. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BSSA9 (Barry's Garage)

Policy and modifications:

Comments:

- Consistent with policy BE3 **an increase in employment the maximum viable amount of industrial** floorspace will be sought as part of any redevelopment.

Justification: Consistency with policy BE3 on employment floorspace re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	++	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	-
Post hearing	-	+	++	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	-

Explanation of post-hearing scoring: No change. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BSSA13 (Learie Constantine Centre)

Policy and modifications:

Indicative housing capacity:
1526

Justification: Reflect figure in Housing Trajectory

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c
Submission	-	+	+	+	++	++	+	0	+	0	0	!	0	+	0	0	+	+	+	+
Post hearing	-	+	+	+	++	++	+	0	+	0	0	!	0	+	0	0	+	+	+	+

Submission stage amendments: Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A).

5.6 – South East Place

Policy BP6 South East

Policy and modifications:

Homes:

d) **Minimum of 5,100 additional homes in the period to 2041, with an important component being** South Kilburn Growth Area, **which** will deliver approximately 3,400 **over 2,100** new high quality homes **(or, a minimum of 800 net additional homes once demolitions are taken into account)**, with a target of 50% affordable including social rented for existing secure tenants of South Kilburn **estate**.

d i) Deliver a minimum of 348 new homes in the Kilburn Neighbourhood Forum area in the period to 2041.

Town Centres

j) **In the period to 2028 provide up to 7,200 sqm net comparison retail floorspace, to be directed to Kilburn town centre in the first instance. Provide up to 7,500 sqm net convenience retail floorspace, 600 sqm café and restaurant floorspace, and 300 sqm drinking establishment floorspace across the town centres of** Cricklewood, Willesden Green, Queen’s Park and Kensal Rise. ~~will provide convenience retail for local communities in addition to a restaurant and café offer. New convenience retail floorspace of over 500sqm will be in the first instance directed to Willesden Green and Cricklewood.~~

Community and cultural facilities

k) **Meeting social infrastructure requirements by securing provision for needs arising from new housing development especially the provision of new education, health, cultural and community facilities notably** ~~Securing infrastructure in South Kilburn. to include a new community space, 3 form of entry primary school and nursery and other community uses.~~

l i) Promoting increased cultural and community use of the Gaumont State Cinema.

Justification: To provide clarity on strategic housing delivery numbers across the Places and consistency of approach across the Place policies, provide housing figure for designated neighbourhood plan areas as required by NPPF paragraph 65, to align floorspace quanta with those recommended within table 2.1 of the Retail and Leisure Needs study (EB_E_06). Also reflects changes to Use Class Order, and to reflect uses of site allocations. Include requirement for essential infrastructures in accordance with the Council’s evidence base.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	++	++	+	+	0	+	++	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	++	+

Post hearing	++	++	++	+	0	+	++	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	++	+
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Submission stage amendments: Addition of reference to provision of new education, health and cultural facilities. Change EC4 from “minor positive” to “significant positive” due to provision of new educational facilities in a large area. Change S1 from “minor positive” to “significant positive” due to provision of new community facilities in a large area. Change S2 from “minor positive” to “significant positive” due to provision of new health facilities in a large area. Change S7 from “minor positive” to “significant positive” due to provision of a range of new facilities in a large area.

Explanation of post-hearing scoring: It is anticipated that the high number of housing units to be delivered within this place will help achieve a higher rate of delivery, thus making housing more accessible to all. The delivery of non-residential floorspace has already been integrated within the submission version of this assessment, and it is not foreseen that the increased quanta will significantly increase the impact upon economic criteria. Although the delivery of new cultural and community floorspace is likely to have positive impacts across a number of social criteria, notably S2 (health and well-being), S4 (quality of surroundings), S6 (community identity), and S7 (accessibility), these impacts are not anticipated to be significant for any particular criteria, but rather be marginal beyond that which the policy already achieves. It is considered that these positive impacts will be felt across all protected characteristic groups as the proposed infrastructure will be made accessible to all.

Policy BSEGA1 (South Kilburn Growth Area)

Policy and modifications:

South Kilburn Growth Area will deliver approximately 3,400 **over 2,100** new homes **(or a minimum 800 net additional homes one demolitions are taken into account)** to 2041, supported by social and physical infrastructure to include:

Justification: To better reflect gross and net development within the South Kilburn growth area over the lifetime of the Local Plan.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	+	+	+	+	+	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+

Post hearing	+	+	+	+	+	+	+	+	-	0	+/-	+	+	+	0	+	+	+	?	+	+	+	+	+
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Explanation of post-hearing scoring: No change. Although decrease in housing delivery in this area, the previous delivery is still significant and therefore unlikely to significantly impact sustainability criteria.

Policy BSESAS (Craik)

Policy and modifications:

Indicative Capacity 120-50 net (121 gross)
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Justification: Reflect figures in Housing Trajectory.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 ^a	EN1 ^a	EN2 ^a	EN3 ^a	EN4 ^a	EN4 ^b	EN4 ^c	EN5 ^a	EN7 ^a	EN1 ^{1a}	EN1 ^{2a}	EN1 ^{2b}	EN1 ^{2c}
Submission	++	+	++	-	0	+	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Post hearing	++	+	++	-	0	+	+	0	+	0	0	!	0	?	0	0	+	+	+	+

Submission stage amendments: Minor negative due to loss of 171 homes (net loss of 50) (S3A).

Policy BSESAS8 (Hereford House & Exeter Court)

Policy and modifications:

Indicative Capacity 20296 net (250 gross)

Planning considerations:

- Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.**

Justification: Reflect site capacity as included within the Housing Trajectory. To conform with national policy with regards to flooding.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	++	+	++	+	0	+	+	0	++	0	0	!	0	?	0	0	+	+	+	-
Post hearing	++	+	++	+	0	+	+	0	++	0	0	!	0	?	0	0	+	+	+	-

Submission stage amendments: Change in housing capacity from 202 to 250. Minor positive due to net gain of fewer than 100 homes (net gain of 96) (S3A)

Explanation of post-hearing scoring: No change. Implications upon criterion EN12c only, with regards to surface water flooding. Consideration only regards the proportion of the site within associated flood zones, and does not consider the wording of the policy. The proportion of the site within specific flood zones has not changed.

Policy BSESA11 (Old Granville Open Space)

Policy and modifications:

Indicative Capacity

~~1020~~

Justification: Reflect figures in Housing Trajectory.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN4a	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c

Submission	+	+	++	+	++	+	+	0	+	0	0	--	0	?	0	0	--	+	+	-
Post hearing	+	+	++	+	++	+	+	0	+	0	0	--	0	?	0	0	--	+	+	-

Submission stage amendments: Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A).

Policy BESA12 (Wordsworth, Masefield, and part of South Kilburn Open Space)

Policy and modifications:

Indicative Capacity

~~Unknown~~ **-40 net**

Planning considerations:

- Reprovision of the existing Multi-use Games Area (MUGA) which is present at the Kilburn Park Junior School site, together with a community use agreement covering this, and other spaces such as halls, within the school.**

Justification: Reflect capacity as included within Housing Trajectory. To the need to replace existing community facility and incorporate essential infrastructure needs.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a EN11	a EN12	b EN12	c EN12
Submission	+	+	++	-	++	+	+	0	+	0	0	-	0	+	0	0	+	+	+	+
Post hearing	+	++	++	-	++	+	+	0	+	0	0	-	0	+	0	0	+	+	+	+

Submission stage amendments: Change in housing capacity from 'unknown to -40. Minor negative due to loss of 40 dwellings (S3A)

Explanation of post-hearing scoring: It is anticipated that the re-provision of a MUGA on site will increase criterion S2a (health and well-being) to significantly positive due to the provision of further sports facilities.

Policy BSESA16 (OK Club)

Policy and modification:

Infrastructure requirements:

Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.

Justification: To reflect Thames Water requirements regarding capacity of existing infrastructure.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	+	+	++		0	+	+	0	+	0	0	!	0	+	0	0	+	+	+	+
Post hearing	+	+	++		0	+	+	0	+	0	0	!	0	+	0	0	+	+	+	+

Explanation of post-hearing scoring: Reference to need for water infrastructures of no impact as no relevant criteria.

Policy BSESA18 (245-289 Cricklewood Broadway))

Policy and modification:

Infrastructure requirements:

Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.

Planning considerations:

- ~~Draft London Plan policy E4 identifies Brent as a borough which is to provide additional industrial capacity. As such, **As a Local Employment Site, the maximum viable amount of an increase in employment industrial** floorspace will be **sought** required as part of any redevelopment, **in accordance with policy BE3.**~~

Justification: To reflect Thames Water requirements regarding capacity of existing infrastructure, and conformity with policy BE3 on employment land re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	0	+	++	+	++	++	+	0	+	0	0	-	0	?	0	0	+	+	+	+
Post hearing	0	+	++	+	++	++	+	0	+	0	0	-	0	?	0	0	+	+	+	+

Explanation of post-hearing scoring: Reference to need for water infrastructures of no impact as no relevant criteria. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BSESA20 (Kilburn Square)

Policy and modifications:

Infrastructure requirements:

- Re-provision of the market and creation of a new public square. **Replacement of health centre with an alternative use that meets community needs.**

Justification: To reflect CCG's confirmation of no longer requiring a health centre, however the site can serve other social infrastructure needs.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a EN11	a EN12	b EN12	c EN12
Submission	++	+	++	++	++	+	+	0	++	0	0	!	0	+	0	?	+	+	+	+
Post hearing	++	+	++	++	++	+	+	0	++	0	0	!	0	+	0	?	+	+	+	+

Explanation of post-hearing scoring: No change. Previous assessment considered the retention of the health centre, however, now it has been identified as surplus to requirement, the site will benefit from an otherwise similar community facility.

Policy BSESA21 (Willesden Green Sainsbury's and Garages)

Policy and modifications:

Allocated Use

Mixed-use including housing **and** retail **and employment uses.**

Justification: Reflect existing on site uses.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	+	+	++	++	++	0	+	0	0	!	0	?	0	0	+	+	+	-
Post hearing	-	+	+	+	++	++	++	0	+	0	0	!	0	?	0	0	+	+	+	-

Explanation of post-hearing scoring: No change. Retail still considered appropriate use on site, which is likely to be delivered at approximately existing capacity as is required by the policy. As such, relevant criterion EC2a remains unchanged at +/- 1000sqm.

Policy BSESA22 (Queen's Parade)

Policy and modifications:

Indicative Homes: ~~20~~42

Justification: Reflect figures in Housing Trajectory.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	+	+	++	++	++	0	+	0	0	!	0	?	0	0	+	+	+	+
Post hearing	-	+	+	+	++	++	++	0	+	0	0	!	0	?	0	0	+	+	+	+

Submission stage amendments: Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A).

Policy BSESA25 (Park Avenue Garages)

Policy and modifications:

Indicative Homes: ~~50~~70

Justification: Reflect figures in Housing Trajectory.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c	EN1
Submission	-	+	+	+	++	++	+	0	0	0	0	!	-	?	0	0	+	+	+	+	!
Post hearing	-	+	+	+	++	++	+	0	0	0	0	!	-	?	0	0	+	+	+	+	!

Submission stage amendments: Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A).

Policy BSESA34 (Kilburn Park Underground Station)

Policy and modifications:

Indicative Homes: ~~Unknown~~20

Justification: Reflect figures in Housing Trajectory.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c	EN1
Submission	+	+	++	?	++	+	+	0	++	0	0	!	0	0	0	?	0	+	+	+	!

Post hearing	+	+	++	?	++	+	+	0	++	0	0	--	0	0	0	?	0	+	+	-
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Submission stage amendments: Site still provides fewer than 100 homes so there is still a minor positive impact (S3A).

Policy BSESA35 (303-309 Cricklewood Broadway)

Policy and modifications:

Comments: **An uplift in employment** The maximum viable provision of industrial floorspace will be required as part of any redevelopment.

Justification: Consistency with policy BE3 on employment land re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 ^a	EN1 ^a	EN2 ^a	EN3 ^a	EN4 ^a	EN4 ^b	EN4 ^c	EN5 ^a	EN7 ^a	EN1 ^{1a}	EN1 ^{2a}	EN1 ^{2b}	EN1 ^{2c}
Submission	-	+	++	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+
Post hearing	-	+	++	+	++	++	+	0	+	0	0	!	0	?	0	0	+	+	+	+

Submission stage amendments: No change. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

5.7 – South West Place

Policy BP7 South West

Policy and modifications:

Homes:
<p>d) Minimum of 10,600 additional homes in the period to 2041 through Continuing residential-led mixed-use development within the Alperton Growth Area (minimum 6,800 additional homes) and the Wembley Growth Area (that also crosses into the Central Place) and Alperton Growth Areas, the Ealing Road and Sudbury town centres and intensification corridors.</p> <p>di) Delivering a minimum of 245 new homes in the Sudbury Town Neighbourhood Plan area in the period to 2041.</p>
Town centres:
<p>g) Providing a quality, diverse retail offer in Wembley town centre by providing for an additional 4,300sqm of A3 food and drink and A4 pubs/drinking establishments floorspace particularly in secondary shopping frontages to further support an evening economy and support the centre's potential change in status to a metropolitan centre in the London hierarchy. 2,100 sqm of additional comparison retail floorspace, and 4,300 sqm of convenience retail floorspace to 2028, in addition to that already existing and consented.</p>

Justification: To provide clarity and provide consistency with Local Plan (Policy BD2 and Policy BE2) and Brent’s Retail and Leisure Needs Study (evidence base). Set out housing delivery for the Place, provide housing target for defined neighbourhood areas in line with national policy.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	+	+	0	+	+	+	-	0	-/+	+	+	+	+	0	+	+	?	+	+	+	+	+
Post hearing	+	+	++	+	0	+	+	+	-	0	-/+	+	+	+	+	0	+	+	?	+	+	+	+	+

Explanation of post-hearing scoring: It is anticipated that the stronger emphasis on housing delivery within this place will help achieve a higher rate of delivery, thus making housing more accessible to all. The delivery of non-residential floorspace has already been integrated within the submission version of this assessment, and it is not foreseen that the change in quanta will significantly alter the impact upon economic criteria. The housing figures for the Harlesden Neighbourhood Plan area have been included for consistency with national policy only, and are figures which the council considers are likely to arise as a result of the new positive position on small sites housing delivery, as well as identified site allocation capacity. This does therefore not represent a significant change from policy, but rather reflects our broad approach and

as such is unlikely to result in a change of scoring with regards to the sustainability appraisal criteria. It is considered that these positive impacts will be felt across all protected characteristic groups as the proposed infrastructure will be made accessible to all.

Policy BSWGA1 (Alperton Growth Area)

Policy and modifications:

In addition to over ~~6000~~ **6,800** additional homes, Alperton will be encouraged to become an enterprise **hub**. This will principally be through new business and employment floorspace within those residential developments to provide a major boost to business and employment opportunities. This will deliver a new varied supply of neighbourhood friendly modern light industrial premises, studios and managed workspaces for local business, creative industries, and artists to reinvigorate the local economy.

All developments will achieve the highest design standards and contribute positively better integrating the canal and its hinterland into Alperton into the surrounding area. Energy efficient design and renewable energy are encouraged. Development will be supported by associated additions to social infrastructure identified in the Infrastructure Delivery Plan, which will include:

- ~~public squares and pocket parks~~ A series **of equipped** play areas within new developments and open space
- **Creation of informal recreation, Good quality public realm** along the canal and linking improved pedestrian and cycling routes;
- **4 x 0.2ha Pocket park**
- Improvements to the quality and accessibility of existing public open spaces;
- **Opportunities for Food growing**
- New nursery facilities;
- New health facilities (as part of the Northfields Industrial Estate regeneration scheme)
- ~~A new 1-hectare public open space;~~
- Multi-use community centre;
- Roads/Junction and other public transport improvements; and
- Planting new trees.

Justification: Provide consistency with London Plan, set out housing delivery in this strategic policy for the Place and update to better reflect the Open Space Sports and Recreation Study (evidence base).

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	+	+	0	+	+	+	-	0	+/-	+	+	+	+	+	+	+	?	+	+	+	0	+
Post hearing	+	++	+	+	0	+	+	+	-	0	+/-	++	+	+	+	+	+	+	?	+	+	+	0	+

Explanation of post-hearing scoring: Although increased housing delivery in this area, the previous delivery was significant and therefore unlikely to significantly impact sustainability criteria. It is anticipated that the delivery of additional open space facilities will increase both criteria’s S2 (health and wellbeing), and EN5 (biodiversity). New parks are likely to increase people’s mental and physical well-being, as well as providing places of refuge for biodiversity. It is considered that these positive impacts will be felt across all protected characteristic groups as the proposed infrastructure will be made accessible to all.

Policy BSWSA1 (Alperton Industrial Sites)

Policy and modifications:

<p>Indicative Capacity</p> <p>12001850</p> <p>Planning considerations:</p> <ul style="list-style-type: none"> <u>An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.</u> <p>Infrastructure requirements:</p>
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- **The enhancement of the existing moorings along the southern stretch of the canal should be considered in association with the Canals and Rivers Trust. In addition, developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.**

Justification: Align with housing trajectory, and include reference to CRT considerations. Include requirement for reprovision of essential infrastructure.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	++	++	++	++	-	0	+	0	+	-	0	?	0	0	+	+	0	-
Post hearing	-	+	++	++	++	++	-	0	+	0	+	-	0	?	0	0	+	+	0	-

Submission stage amendments: Clarification regarding re-provision of floorspace. No overall change in gain or loss of employment space so no change to ratings.

Explanation of post-hearing scoring: Although the increase in housing capacity is significant, delivery is still above 100 units, and as such achieves the maximum score for the relevant criteria. Again, although the enhancement of adjacent moorings is likely to improve living conditions for existing narrowboat residents, the relevant criteria are already maxed out. Although the delivery of more sustainable thermal regulation measures is likely to be positive with regards to climate change mitigation, there is no specific criterion for which to assess this against on the site allocation SA.

Policy BSWSA3 (Atlip Road)

Policy and modifications:

Indicative Capacity

335,450 dwellings

Justification: Align with housing trajectory.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a	EN11	a	EN12	b	EN12	c	EN12
Submission	-	+	++	++	++	++	-	0	+	0	0	-	0	~	0	0	+	+	+	-	-	-	-	
Post hearing	-	+	++	++	++	++	-	0	+	0	0	-	0	~	0	0	+	+	+	-	-	-	-	

Explanation of post-hearing scoring: No change. Implications only regard criterion S3a (housing). The site still delivers 100+ homes.

Policy BSWA4 (Sunleigh Road)

Policy and modifications:

Planning considerations:

- Given that the site is existing employment **industrial** land and Brent's status as a provide capacity borough, the council will require **the maximum viable amount of** ~~no net loss of employment industrial~~ floorspace, with re-provision probably provided on the ground floors of the new buildings and where necessary to meet capacity requirements on upper floors.

Justification: Consistency with policy BE3 on employment floorspace re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	a	EN11	a	EN12	b	EN12	c	EN12
Submission	-	+	++	++	++	++	-	0	-	0	+	-	-	~	0	0	+	+	+	-	-	-	-	

Post hearing	-	+	++	++	++	++	-	0	-	0	+	--	--	?	0	0	+	+	-	-
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Explanation of post-hearing scoring: No change. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BSWSA5 (Abbey Industrial Estate)

Policy and modifications:

Indicative Capacity 590 490
Planning considerations: <ul style="list-style-type: none"> Given that the site is existing employment industrial land and the identified need within the Brent's status as a provide capacity borough, some maximum viable re-provision of employment industrial floorspace along the ground floors of the new buildings will be required as well as other potential uses such as small scale retail, commercial leisure or community uses (e.g. nursery).

Justification: Reflect figures in Housing Trajectory, and consistency with policy BE3 on employment land re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c
Submission	-	+	++	++	++	++	++	0	.	0	+	!	!	?	0	0	+	+	.	.
Post hearing	-	+	++	++	++	++	++	0	.	0	+	!	!	?	0	0	+	+	.	.

Submission stage amendments: No change. Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A). The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BSWSA6 (Beresford Avenue)

Policy and modifications:

Allocated Use
Mixed-use residential-led development incorporating employment industrial uses.
Indicative Capacity
135-147
Planning considerations:
<ul style="list-style-type: none"> Given that the site is an existing employment industrial land and the identified need within the Brent's status as a provide capacity borough, the maximum viable re-provision of employment industrial floorspace along the ground floors of the new buildings will be required.

Justification: Align with London Plan terminology. Reflect figures in the Housing Trajectory, and consistency with policy BE3 on employment floorspace re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c
Submission	-	+	++	++	++	++	++	0	.	0	+	!	!	?	0	0	+	+	.	.
Post hearing	-	+	++	++	++	++	++	0	.	0	+	!	!	?	0	0	+	+	.	.

Submission stage amendments:

- Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A).

- No overall change in gain or loss of employment space so no change to ratings.

Explanation of post-hearing scoring: No change. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BSWSA7 (Northfields)

Policy and modifications:

Indicative Capacity

~~2900~~ **3,030 new homes**

Justification: Align with housing trajectory

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	0	-	++	++	++	+	++	++	0	!	+	!	!	?	-	0	++	-	-	-
Post hearing	0	-	++	++	++	+	++	++	0	!	+	!	!	?	-	0	++	-	-	-

Explanation of post-hearing scoring: No change. Implications only regard criterion S3a (housing). The site still delivers 100+ homes.

Policy BSWSA8 (Wembley High Road)

Policy and modifications:

Planning considerations:

- Given **the identified need within the** Brent's status as a provide capacity borough, the Council will seek **maximum viable no net loss of** employment floorspace **reprovision, existing industrial should be reprovided as** and encourage to maximise its provision suitable for B1 (c), B8 and B2 use: **research and development/light industrial/general industrial/storage or distribution.**

Justification: Consistency with policy BE3 on employment floorspace reprovision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c
Submission	-	+	++	++	++	++	++	0	+	0	0	!	0	?	-	?	+	+	+	+
Post hearing	-	+	++	++	++	++	++	0	+	0	0	!	0	?	-	?	+	+	+	+

Explanation of post-hearing scoring: No change. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BSWSA10 (Elm Road)

Policy and modification:

Infrastructure requirements:

Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.

Planning considerations

- As Brent is a provide capacity borough in the London Plan, **Given the identified need within the borough**, the loss of the garage means that employment **maximum viable industrial floorspace** use should be re-provided ~~through a net increase in employment industrial floor space.~~

Justification: To reflect Thames Water requirements regarding capacity of existing infrastructure, and consistency with policy BE3 on employment land re-provision.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2a	EN1a	EN2a	EN3a	EN4a	EN4b	EN4c	EN5a	EN7a	EN11a	EN12a	EN12b	EN12c
Submission	-	+	++	++	++	++	++	+	+	0	0	!	0	+	-	0	0	+	+	-
Post hearing	-	+	++	++	++	++	++	+	+	0	0	!	0	+	-	0	0	+	+	-

Explanation of post-hearing scoring: No change. Reference to need for water infrastructures of no impact as no relevant criteria. The approach taken toward employment land intensification has changed toward one which simply seeks to provide the maximum viable quantum of employment floorspace. This impacts criterion EC2a. In this instance, the score remains the same at 0, being likely to deliver slightly more (up to +1000sqm), or slightly less (up to -1000sqm) than exists already.

Policy BSWSA12 (Keelers Service Centre)

Policy and modifications:

Indicative homes
24 22

Justification: Reflect figures in Housing Trajectory.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	-	+	++	+	++	++	-	0	+	0	0	!	0	?	0	0	+	+	+	-	-	+	++	+
Post hearing	-	+	++	+	++	++	-	0	+	0	0	!	0	?	0	0	+	+	+	-	-	+	++	+

Submission stage amendments: Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A).

Policy BSWSA15 (Employment Land on Heather park Drive)

Policy and modifications:

Indicative homes
28 36

Justification: Reflect figures in Housing Trajectory

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c	EN1
Submission	-	+	++	+	++	-	++	0	-	0	0	!	!	?	0	0	+	+	.	.	.
Post hearing	-	+	++	+	++	-	++	0	-	0	0	!	!	?	0	0	+	+	.	.	.

Submission stage amendments: Still provides for between 10 – 99 homes, therefore there is still a minor positive impact (S3A).

Policy BSWA16 (Carphone Warehouse 416 Ealing Road)

Policy and modifications:

Indicative homes

~~80~~-120

Justification: Reflect figures in Housing Trajectory

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c	EN1
Submission	-	-	++	++	++	-	-	0	+	!	0	!	0	?	0	0	+	+	.	.	.
Post hearing	-	-	++	++	++	-	-	0	+	!	0	!	0	?	0	0	+	+	.	.	.

Submission stage amendments: Change from minor positive to significant positive, as now has an indicative capacity of over 100 homes (S3A).

Policy BSWA17 (Former Wembley Youth Centre)

Policy and modifications:

Indicative homes

150-170

Justification: Reflect figures I Housing Trajectory.

IIA Objective Scoring:

Criteria	S1a	S2a	S2b	S3a	S5	S7a	S7b	EC2 a	EN1 a	EN2 a	EN3 a	EN4 a	EN4 b	EN4 c	EN5 a	EN7 a	EN1 1a	EN1 2a	EN1 2b	EN1 2c
Submission	-	+	++	++	++	++	++	0	!	0	0	!	!	+	0	0	+	+	+	!
Post hearing	-	+	++	++	++	++	++	0	!	0	0	!	!	+	0	0	+	+	+	!

Submission stage amendments: Site still provides for 100+ homes, therefore there is still a significant positive impact (S3A).

Chapter 6 - Theme chapters

6.1 - Design

Policy BD2 (Tall Buildings)

Policy and modifications:

Amend part of the policy to read:

A tall building is one that is more than ~~6 metres above the general prevailing heights of the surrounding area or more~~ 30 metres in height

Tall buildings are directed to the locations shown on the policies map in Tall Building Zones, ~~intensification corridors, town centres and site allocations.~~

In Tall Buildings Zones heights should be consistent with the general building heights shown on the policies map, stepping down towards the Zone's edge. In intensification corridors and town centres outside conservation areas **and areas of distinctive residential character** developments of a general building height of 15 metres above ground level could be acceptable, with opportunities to go higher at strategic points in town centres.

~~Elsewhere tall buildings not identified in site allocations will only be permitted where they are:~~

~~a) of civic or cultural importance; or~~

~~b) on sites of a sufficient size to successfully create a new character area while responding positively to the surrounding character and stepping down towards the site edges.~~

In all cases the tall buildings must be shown to be positive additions to the skyline that would enhance the overall character of the area. They should be of exceptional design quality, consistent with London Plan Policy requirements in showing how they positively address their visual, functional, environmental and cumulative impacts.

Justification: Consistency with London Plan Policy D9, to reflect the SoS Direction on the definition of tall buildings. Areas of distinctive character have been excluded for general building heights of 15 metres above ground floor level as it is likely that these will be taken forward as conservation areas in the future.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
----------	----	----	----	----	----	----	----	-----	-----	-----	-----	-----	-----	-----	-----	-----	------	------	------	-----	-----	-----	-----	-----

Submission	0	0	+	+	0	0	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0
Post hearing	0	0	+	+	0	0	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0

Explanation of post-hearing scoring: Amendments for consistency with the London Plan only. The exclusion of areas of distinctive character from being identified as potentially acceptable for developments of up to 15 metres will likely provide better outcomes in terms of protecting the character of those areas, although it is not anticipated this will have a significant impact, in that the impact of character on those areas would also be considered in assessing the suitability of taller buildings in those locations. Appropriate building heights for tall buildings within defined locations are still principally determined by the Tall Building Strategy. The new tall building definition has changed the policy wording with regards to intensification corridors and town centres, which were previously identified for up to 5 and 6 storeys respectively. Given this no longer qualifies as a tall building, the wording has been changed. Ultimately, these amendments do not result in a fundamental change to Council’s approach towards tall and taller building development in identified locations within the borough. The change in definition of a tall building may provide opportunities for taller buildings (up to 30 metres) outside defined Tall Buildings Zones, nevertheless this change is not seen as being likely to result in significantly different outcomes as other London Plan and Local Plan policies seek to ensure development is complementary to the existing character of the borough. Similarly the removal of the flexibility which allowed for in a limited number of circumstances tall buildings to potentially be acceptable outside tall buildings zones is unlikely to significantly change outcomes for example to EN6 as these scenarios would in all likelihood been exceptional cases.

Policy BD3 (Basements)

Policy and modifications:

Proposals for basement development of an existing property must:

- f) Ensure any lightwells are modest in scale, preferably located to the rear and if located to the front are no more than whichever is the smaller of 800mm or half the length of the garden.
- g) **Be protected from sewer flooding by a suitable pumped device**

Justification: Clarity on measures required to reduce potential risk of basement flooding.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	0	+	+	+	0	0	0	0	-	0	0	+	+	0	0	0	0	0	+	0	0	0	0	0
Post hearing	0	+	+	+	0	0	0	0	-	0	0	+	+	0	0	0	0	0	+	0	0	0	0	0

Explanation of post-hearing scoring: The amendment will ensure that basement developments are adaptive to the potential of sewer flooding. This will be positive, however, the criterion which considers flooding (EN12) only considers the avoidance of development within areas prone to flooding, and does not consider its management if flooding is to take place. As such, the policy amendments are not considered to alter the sustainability criteria scoring.

6.2 - Housing

Policy BH1 (Increasing Housing Supply in Brent)

Policy and modifications:

The council will maximise the opportunities to provide additional homes in the period to 2041 and beyond. To achieve this it will grant planning permission to support the delivery of the Growth Areas, site allocations and appropriate windfall sites to provide a minimum ~~27,482~~ **23,250** homes in the period 2019/20-2028/29. ~~It will positively plan to promote a further minimum of 18,074 homes from 2029/30 to the end of the Plan period in 2041 and a minimum of 46,018 homes in the period 2019/20-2040/41.~~ Delivery will be assessed against Appendix 3 Housing Delivery Trajectory **Annual Housing Requirement**.

Justification: Provide consistency with the Plan period, London Plan requirements and updated housing trajectory.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	+	?	?	?	?	-	-	?	-	?	?	?	-	-	?	+	+	+	?	+	+	?

Post hearing	+	+	+	?	?	?	?	-	-	?	-	?	?	?	-	-	?	+	+	+	?	+	+	?
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Explanation of post-hearing scoring: No change to scorings. The reduction in numbers in the period to 2028/29 relates to Brent’s target in the adopted London Plan to be used for monitoring purposes and will reduce the potential to fall foul of the NPPF’s housing delivery tests. The draft Brent Local Plan previously identified that it could not meet the earlier draft London Plan target as the Council considered this unrealistic taking account of Brent’s circumstances. The target is a minimum, so there is the potential for delivery to be higher and this is reflected in the Council’s housing trajectory. The overall projected delivery of housing as a result of the Local Plan to 2041 has not changed significantly above what was already a substantial amount of delivery, as such there are not considered to be any changes to the policy’s outputs.

Policy BH2 (Priority areas for additional housing provision within Brent)

Policy and modifications:

Amend policy to read:

In addition to the Growth Areas and Site Allocations identified in this Plan, town centres, edge of town centre sites, **areas with higher levels of public transport accessibility levels** and intensification corridors will be priority locations where the provision of additional homes will be supported.

Within town centres, edge of town centre sites and intensification corridors where existing non-residential floorspace forms part of a site proposed for residential development, the council will require re-provision of the same amount and use class of non-residential floorspace. Exceptions to this will be where it can be shown that:

- a) **the site is allocated or has planning permission for an alternative use(s);**
- b) there is no need for it or reasonable prospect of its use if provided; or
- c) in exceptional cases that its loss is outweighed by the benefits that its replacement with residential floorspace will bring.

Justification: Consistency with London Plan and provide clarity on status of existing permissions within the policy.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	?	?	?	?	+	+	-	0	-	+	+	?	+	+	+	?	+	+	+	+	+	?
Post hearing	+	+	?	?	?	?	++	++	-	0	-	+	+	?	+	+	+	?	+	+	+	+	+	?

Explanation of post-hearing scoring: It is considered that the delivery of housing in high PTAL locations will positively impact criteria's S7 (accessibility) and EN1 (traffic). Although through the priority locations previously identified in this policy and elsewhere in the Plan a significant proportion of new homes would have been delivered in areas with better access to public transport, the additional prioritisation particularly applicable to potential windfall developments is likely to mean that more housing is delivered in areas close to public transport nodes, reducing dependence of personal vehicles, and increasing their accessibility to essential infrastructures such as are provided around LUL stations and within town centres. It is considered that by delivering housing in areas with greater PTAL will be of benefit to individuals who exhibit a number of protected characteristics, including across age, sex and disability specifically, as homes will be more easily accessible in more safe environments. Ethnic minority groups who are also likely to be less likely to have access to a private car due to their lower incomes will also benefit from new homes having better access to public transport.

Policy BH3 (Build to Rent)

Policy and modifications:

The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent. To encourage increased housing delivery, within each Growth Areas (excluding South Kilburn) or development sites of 500 dwellings or more, the provision of Build to Rent properties will be expected unless this would:

Justification: Clarity and consistency with the London Plan.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
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Submission	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0
Post hearing	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0

Submission stage amendments: No change to scorings. It is not considered that this would result in any changes to social objectives as generally the affordability of build to rent products will be the same as those of private rented products.

Policy BH4 (Small Sites)

Policy and modifications:

Amend policy to add new text to read:

~~Planning Permission for Small Sites will be determined in accordance with London Plan Policy H2 with the exception of:~~

~~Criterion D 2, which in Brent will only apply within PTAL 3-6 locations~~

Small housing developments (below 0.25 hectares or 25 dwellings in size) delivering a net addition of self-contained dwellings through the more intensive and efficient use of sites, where consistent with other policies in the development plan, will be supported within the priority locations of PTAL 3-6, intensification corridors, or a town centre boundary through:

- a) the infill of vacant or underused brownfield sites,**
- b) residential conversions, redevelopment, extensions of dwellings, or infill within the curtilage of a dwelling**
- c) the redevelopment of flats, non-residential buildings and residential garages,**
- d) upward extensions of flats and non-residential buildings**

In these priority locations, the character of the existing area will be subject to change over the Local Plan period. Outside the priority locations greater weight will be placed on the existing character of the area, access to public transport and a variety of social infrastructure easy accessible on foot when determining the intensity of development appropriate.

Developments that demonstrably fail to optimise potential housing delivery on a site or prejudice more comprehensive development, particularly that of a site allocation, will be refused.

All minor residential developments (less than 10 dwellings) are required to deliver an Urban Greening Factor of 0.4 on site.

Amend policy justification to read:

Justification

- 6.2.1 ~~The London Plan sets ambitious targets for small site development across London on the basis of the content of Policy H2 Small Sites. The council is positive about the extent to which small sites can contribute towards meeting housing needs. It anticipates delivery of about 370 dwellings per year. In relation to Policy H2 the council has in the Local Plan identified town centre boundaries and main movement/ public transport corridors (known as intensification corridors) as principal areas where it considers the most obvious potential exists. The London Plan in Policy H2 Small Sites identifies that for London to deliver more of its housing; a substantial contribution from smaller sites below 0.25 hectares in size will be required. It sets a Brent minimum target of 4,330 for the period 2019/20 - 2028/29 from this source. Consistent with the London Plan, the Council wants to encourage the development of small sites and provide a positive environment for small site developments in areas with good access to public transport and local services.~~
- 6.2.2 ~~As an outer London borough Brent has comparatively high car dependency rates for journeys, particularly north of the North Circular Road. Some tube and railway stations are located in town centres, some however are not and otherwise have a poor level of access to viable public transport alternatives, employment and retail/ other facilities to meet every day needs away from the immediate vicinity of those stations. London Plan policy H2's 800 metre buffer around town centres and underground/ railway stations also takes no account of the quality of the physical links to those centres or the quality of public transport service there. A large site development might be able to address these through contributions to improve links or public transport improvements/ contributions to provision of controlled parking zones. Small developments however usually are not subject to S106 and provide limited Community Infrastructure Levy funds which are therefore unlikely to be able to satisfactorily address such shortcomings. In addition, the percentage of residents that use the train/ underground as their main/ only mode of transport is very limited. The policy identifies the types of the developments considered likely to be appropriate and the priority locations for these types of developments. The areas are likely to be some of the better served by public transport and thus more sustainable, in terms of reducing reliance on the private car with its associated impacts, such as air quality. The Council accepts that priority locations that are not identified as designated heritage assets or areas of distinctive residential character are likely to be subject to substantial change in character over the Plan period. Whilst character will change, the Council will still expect high quality development.~~
- 6.2.41 ~~As such the council considers that London Plan Policy H2 needs some refinement to take account of Brent circumstances. In areas where small scale development is likely to encourage high levels of car dependency it could undermine other objectives, such as reducing travel by car, improving air quality, maintaining quality of life of existing residents and impacting business efficiency related to movement of goods. As such in Brent criterion A2 has been amended to only apply where there are genuine reasonable public transport alternatives that could realistically encourage people to not own/ use a car on a frequent basis.~~

6.2.41 Developments are likely to be within close proximity to existing homes. They should therefore be carefully and creatively designed, to avoid for example an unacceptable level of harm to neighbours' and occupants' amenity. Building design and the placement of windows and the use of landscaping can positively address privacy matters and ensure homes benefit from satisfactory levels of daylight and sunlight. In addition to design guidance for small housing sites that the Mayor will produce, the Council is also likely to adopt its own guidance to reflect Brent's characteristics.

6.2.41a Although it is likely that opportunities will exist outside the priority locations for small sites development, the intensity of development allowed is likely to be less. This is likely to be as a result of the existing character of those areas, which as they are not priority areas for development is not expected to significantly change. In addition the extent to which public transport and access to social facilities is within walking distance will also be considered. The poorer the access, the less intense the acceptable development is likely to be. In order to maximise the potential of all sites within the borough, small housing developments will not be acceptable where they fail to optimise potential housing delivery or prejudice the more comprehensive development of a wider site allocation.

6.2.41b The open, green quality of the suburban environment was part of Brent's historical appeal. Over time, intensification of building coverage and hard landscaping, principally to accommodate cars, has reduced incidental green infrastructure. This has not only affected the visual quality of the environment, but has also bio-diversity, urban temperatures, air quality, and the volume and speed of surface water run-off, together with water quality. Small site development without some form of safeguards could well intensify these matters. Application of the urban greening factor to minor developments will assist in better addressing these matters, making up for the loss of green infrastructure where this might be lost, or supporting its re-introduction where sites may now have none. As such, delivery of green infrastructure on site consistent with an Urban Greening Factor of 0.4 will be sought on site with London Plan Policy G5 Urban Greening applying to minor developments (under 10 dwellings).

LONDON PLAN

Policy H2 Small sites

~~Policy H2A Small Housing Developments~~

Policy G5 Urban Greening

Policy D7 Accessible Housing

Justification: Revise policy and policy justification given that Policy H2A has been removed from the Intend to Publish version of the London Plan.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	0	+	0	0	0	+	+	0	0	+	+	0	0	+	+	0	0	+	0	0	0	0	0
Post hearing	+	0	+	0	0	0	+	+	0	0	+	+	0	0	+	+	0	0	+	0	0	0	0	0

Submission stage amendments:

- Change EN12 from “neutral” to “minor positive” due to the added emphasis on the Urban Greening Factor having potential to reduce flood risk on sites
- Change EN9 from “neutral” to “minor positive” due to the added emphasis on the Urban Greening Factor having potential to reduce overheating / the urban heat island effect
- Change EN5 from “neutral” to “minor positive” due to the added emphasis on the Urban Greening Factor having potential to provide increased opportunities for green infrastructure / biodiversity

The modifications to the policy effectively include the majority of the criteria that were previously incorporated in policy H2A, which was removed from the published London Plan as a result of its examination. It is not considered that this would result in a significant change to the number of dwellings built on small sites compared to the combined use of previous draft London Plan policies and policy BH2, thus does not result in S3 changing from “minor positive”.

Policy BH5 (Affordable Housing)

Policy and modifications:

Amend policy to read:

In Brent the strategic affordable housing target that will apply is 50% of new homes in the period to 2041. **London Plan Policy H5 Threshold Approach to Applications will be applied.** The affordable housing tenure split required to comply with London Plan Policy H56 Threshold Approach to Applications is for:

Non-Build to Rent developments of 10 dwellings or more is:

a) 70 per cent Social Rent/ London Affordable Rent and;

b) 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent, affordable rent within Local Housing Allowance limits and London Shared ownership. These must be for households within the most up to date income caps identified in the London Housing Strategy or London Plan Annual Monitoring Report.

Build to Rent developments, ~~a minimum of~~ 100 per cent at London Living Rent **equivalent rents or lower**.

Developments of between 5-9 dwellings will be required to make a financial contribution for the provision of affordable housing off-site.

Justification: Clarity of alignment with London Plan, and grammar.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	++	+	++	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0
Post hearing	++	+	++	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0

Explanation of post-hearing scoring: It is considered that the new flexible wording around build to rent affordable tenures will allow for the provision of tenures of lower cost than London Living Rent. Although this is anticipated to be positive, it is considered unlikely that most developers would opt for further subsidised products when the delivery of London Living Rent will be sufficient to meet policy requirements. As such no impact upon sustainability criteria are anticipated.

Policy BH7 (Accommodation with Shared Facilities or Additional Support)

Policy and modifications:

Amend part f) and part g) of the policy to read:

e) includes management arrangements agreed with the council suitable to its proposed use and size to not unacceptably impact on neighbour amenity;

- f) demonstrates that there is a specific Brent need, or in the case of education **purpose built student accommodation** a London need, for the particular use; and
- g) will not lead to an over-concentration of the type of accommodation in the area. For Houses in Multiple Occupation this **an over-concentration** is defined as **where no more than 4 of 11 adjacent three or more of the ten nearest properties are Houses in Multiple Occupation.**

Justification: Clarity.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	++	++	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0
Post hearing	++	++	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0

Explanation of post-hearing scoring: Amendment has been made to clarify the area of search when assessing what constitutes an over-concentration of HMO's in an area. The definition has not changed significantly, but rather has been amended for clarity, and to include consideration of units on the other side of the street. As such, it is not anticipated that the amendment will incur a change in sustainability criteria scores.

Policy BH8 (Specialist Housing)

Amend policy to read:

To support achieving the London Plan annual benchmark monitoring provision target **figure** of 230 dwellings per annum the council will require minimum provision of specialist older people's accommodation in the following circumstances:

- a) Within all Growth Areas except South Kilburn developers will be expected to work together to identify sites on which as a minimum 10% of all the Growth Area's additional dwellings over those which already have planning permission will be delivered as specialist older people's accommodation;
- h) Elsewhere, **as a minimum 10% on** sites with a capacity of 500 or more dwellings.

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Justification: Consistency with London Plan terminology and reflects criterion a) of the same supported by viability assessment.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	++	+	++	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Post hearing	+	+	++	+	++	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Explanation of post-hearing scoring: The amendment assist the Council in the delivery of a greater number of specialist older persons homes in large sites outside of Growth Areas. This is unlikely to be significant, as the majority of homes are anticipated to come forward within growth areas. Besides this, the relevant criteria (S3 housing) has already achieved the maximum score and cannot be improved further.

Policy BH9 (gypsy and travellers)

Policy and modifications:

<p><i>Amend policy to read:</i></p> <p>The existing Lynton Close travellers’ site will be retained and reconfigured to maximise the number of pitches available, as well as being brought up to a standard that allows for it to meet its existing residents’ needs unless evidence shows it is no longer needed.</p> <p>The Council will seek to accommodate the identified needs for any additional pitches in it’s the latest available gypsy and travellers needs study that is consistent with the most up to date national or adopted London Plan definition of Gypsy and Travellers and associated needs assessment methodology.</p>

~~Within Growth Areas (except South Kilburn) and developments of 1 hectare or more that will include new homes, the potential for the incorporation of a dedicated Gypsy and Travellers' site/s should be robustly considered as part of any required masterplanning/site design evolution process. If it is evidenced that a more traditional format of site cannot be incorporated, then more innovative ways of accommodating needs should also be shown to have been considered.~~

Any new Proposals for Gypsy and Travellers' sites should:

- c) Meet a Brent derived need for such accommodation;
- i) Be located on a site and in an area both environmentally acceptable for residential occupation **forming part of a balanced and mixed community**, and suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;
- j) Have acceptable accessibility by road users and pedestrians and to local services and public transport; and
- k) Be laid out and incorporate boundary treatments that seek to positively integrate with the adjacent townscape/ communities.

Justification: Consistency with London Plan, National Planning Practice Guidance, incorporates Secretary of State directions, takes account of needs and a site audit which has identified needs for improvements to Lynton Close and potential on site solutions for additional pitches to accommodate residents, plus the on-going engagement with existing Lynton Close occupiers on the choices available to them.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	++	+	++	+	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0
Post hearing	+	+	++	+	++	+	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0

Explanation of post-hearing scoring: Amendment is for consistency with national policy definition and reflects the result of recent engagement with the residents of Lynton Close on how to best meet their needs. The policy remains positive in seeking to meet the latest identified need for the identified group. It now seeks to better utilise existing land used for pitches to seek to better meet this need, and to improve living conditions for existing tenants of the Lynton Close site. It is anticipated that removal of development sites greater than 1ha needing to consider the delivery of gypsy and traveller pitches could reduce potential delivery of additional sites for gypsy and travellers. Nevertheless, it is not clear that such a site could reasonably be sought by policy or obtained through Section 106 obligations to meet needs consistent with national definitions, which effectively show no need. In addition, this has to be balanced up against the potential uncertainty that the retention of this part of the policy

would bring to housing development sites within Growth areas. Retention would increase risk to delivery overall and associated costs of development, affecting viability and therefore overall affordable housing delivery on those sites.

The change to the policy will have mixed impacts on those with a protected characteristic of race. This will principally directly affect those of Irish traveller or Romany gypsy heritage that the policy seeks to address in terms of meeting identified housing needs. The previous policy was reflective of seeking to meet a larger need identified, which resulted from a wider definition of gypsy and traveller than that of national planning policy/guidance, contained within the draft London Plan. Brent Local Plan has to be in general conformity with the London Plan, so based needs on the draft London Plan definition reflecting that it might ultimately become development plan policy. Subsequently, the London Plan definition was recommended for removal by the panel of Inspectors that undertook the examination. This was due to its inconsistency with the Government's national definition on which planning policy for meeting gypsy and traveller needs is required. For Brent the national definition resulted in essentially a zero additional pitch needs requirement. Taking account of the change in circumstances in London Plan policy, the Council did not consider it appropriate to maintain the original BH9 policy requirement of seeking provision of sites for gypsies and travellers in Growth Areas. It was unjustified and inconsistent with national policy. The amended policy reflects and is proportionate taking account of evidence associated with the Council's engagement with occupiers of Lynton Close. The likely outcomes of that process are as yet unknown. It could be that needs are met within the existing site, or that an alternative site might be required. If an alternative is required it is not yet clear how large that will need to be. If required, due to no available land in its ownership it is likely that the Council/public sector will have to purchase a site on the open market. This is as the needs assessment indicated that incomes of the traveller community could principally only support social housing levels of expenditure in meeting householders' needs and it is therefore unlikely that they will purchase and propose a site. On this basis, it was not considered justified to allocate a site/sites, which unless it was in Council ownership, would be likely to be subject to objection from its landowner. Without evidence of need consistent with national policy, ultimately such an allocation on a third party's land could not be justified by the Council through the Plan. As such a criteria based policy which will be used to assess the appropriateness of any new site is considered a sound and justifiable approach. There are currently no realistic policy alternatives available. Whilst the Mayor's wider definition of gypsy and traveller needs arguably reflected older national guidance/ good practice, that might by those representing the gypsy and traveller community be argued to provide a more balanced assessment of need, this cannot reasonably be used as the basis for justifying planning policy. Its appropriateness will be for the Council through its statutory and discretionary role as a direct provider of housing to consider and balance up against the prioritisation of meeting the wider range of general needs and specialist affordable housing. In terms of impacts on other protected characteristics such as race, age and those with a disability, the amendment to the policy will probably result in slight improvements in outcomes. This is principally through likely diversion of subsidy from development sites that would have gone into providing space for gypsy and traveller pitches to more mainstream or specialist affordable housing products that would better meet the needs of those groups who proportionately are more likely to be dependent on affordable housing than those outside these characteristics.

Policy BH13 (Residential Amenity Space)

Policy and modifications:

Amend policy to read:

All new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This is normally expected to be ~~20sqm per flat and 50sqm~~ **per home** for family housing (including ground floor flats) **(3 bedrooms or more) situated at ground floor level and 20 sqm for all other housing.**

Justification: Clarity and reflective of denser developments coming in the borough.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	+	+	0	0	0	0	0	0	0	+	+	0	0	+	0	0	0	0	0	0	0	0
Post hearing	+	+	+	+	0	0	0	0	0	0	0	+	+	0	0	+	0	0	0	0	0	0	0	0

Explanation of post-hearing scoring: The amendment means that 3 bed+ units above ground floor level will now only be expected to deliver 20sqm of private amenity, not 50 as previously prescribed. Delivering the higher quantum of private amenity for family sized dwellings in higher density schemes is challenging particularly within high density schemes. Experience of the existing policy by the Council to date indicates that the amendment to the policy for the most part is more reflective of likely outcomes, providing a pragmatic outcome rather than setting what in the majority of high density developments could be an unrealistically high target. Paragraph 6.2.100 stipulates that where private amenity space cannot be achieved, the required quantum can be reached by providing communal amenity. The amendment could see a reduction in private amenity or communal amenity space accessible to occupants of dwellings of three or more bedrooms. The amendment is not, however, considered likely to significantly alter the sustainability scores as previously realised and is likely to provide better outcomes for occupants than reliance on London Plan minimum amenity space requirements.

6.4 Economy and Town Centres

Policy BE2 (Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS))

Policy and modifications:

Amend first part of the policy to read:

The Council is committed to exceeding the additional 0.6 hectares equivalent of industrial floorspace need within the plan period. Within SIL and LSIS, **as shown on the Borough Policies Map**, development will be supported where it intensifies **employment~~industrial~~** uses, **including those for waste, utilities and transport infrastructure** and accords with the **following** principles:

as follows

Amend table to read:

EmploymentIndustrial Site	Designation	Policy approach
East Lane	SIL	Intensification
Northfields (east and west of Grand Union Canal)	SIL	<p>These sites will be protected for solely industrial uses as defined in London Plan Policy E4 'Land for industry, logistics and services to support London's economic function' Criterion A. employment uses within use class B1c, B2, B8 and closely related sui generis uses. Development will be supported which increases the amount of employmentindustrial floorspace in these use classes, including for start-up and space, move on space. Any loss or reduction in floorspace will be resisted.</p>
Wembley	SIL	
Alperton (central)	LSIS	
Alperton (south)	LSIS	
Brentfield Road	LSIS	
Kingsbury	LSIS	

Staples Corner	SIL	Intensification and some co-location subject to the comprehensive masterplan approach as set out for LSIS below, including requirements a) to g).
Alperton (north)	LSIS	<p>On these sites intensification through co-location will be supported, subject to a comprehensive masterplan approach produced with or agreed by the council demonstrating the following will be achieved:</p> <ul style="list-style-type: none"> a) Conformity with London Plan policy E7; b) a net increase in employment industrial floorspace resulting in a minimum 0.65 plot ratio or the existing floorspace total, whichever is greater, across the masterplan area; c) a mix of B1(b) research and development, B1(c) light industrial, B2 general industrial and B8 storage and distribution employment floorspace will be delivered reflective of borough needs, including start-up space, and move on space;
Church End	LSIS	
Colindale	LSIS	
Cricklewood	LSIS	
Honeypot Lane (Lowther Road)	LSIS	
Honeypot Lane (Westmorelane Road)	LSIS	
Neasden Lane	LSIS	

		<ul style="list-style-type: none"> d) proactive engagement with existing businesses to seek to retain them on site where possible, and support for any businesses that cannot be incorporated to relocate off site; e) 10% of employment floorspace to be affordable workspace; f) the development is of a high quality design and will result in sustainable development, well served by community facilities and open space; and g) any potential conflicts between uses can be mitigated and a high standard of amenity achieved. 	
Northfields (east of Grand Union Canal)	SIL	Co-location within site boundary of extant planning permission subject to as a minimum providing the amount, typology, and affordability of employment floorspace consistent with planning permission 18/0321. Intensification on the remainder of the SIL.	

Justification: For brevity, clarity of location, consistency with target of London Plan and local evidence base and industrial emphasis.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	?	?	+	?	+	0	0	+	0	?	-	?	+	0	?	0	+	0	0	+	?	+	0	+
Post hearing	?	?	+	?	+	0	0	+	0	?	-	?	+	0	?	0	+	0	0	+	?	+	0	+

Submission stage amendments: No change. The IIA Objectives do not refer to particular job types / business types.

Explanation of post-hearing scoring: The Council has now included a target for the provision of industrial land over the Plan period, in accordance with its evidence base. Given the continued emphasis on maximising the utility of existing industrial land for the greater provision of industrial floorspace consistent with the London Plan, it is not considered that this target will substantially change the rate of delivery within the borough which is more likely to be driven by the market, reflecting commercial realities associated with the viability of intensification on existing industrial sites which will remain and be subject to intensification or co-location on designated sites or its incorporation into mixed use schemes elsewhere. As such, there are no anticipated changes to the SA.

Policy BE3 (Local Employment Sites and Work-Live)

Policy and modifications:

Amend and add new text to policy to read:

Local Employment Sites have an important role to play in ensuring that a range of employment premises are available to meet employment needs, including ensuring the need for additional industrial floorspace capacity is met in the borough. The council will require their retention and where possible their use for research and development, light industrial, general industrial or storage and distribution will be intensified. The Council will **only** allow the release ~~development of~~ Local Employment Sites to ~~for~~ non-employment uses where:

- a) continued wholly employment use is unviable; or
- b) development increases the amount of **workspace as well as retaining the existing employment use or provides that additional workspace as affordable studio, research and development, light industrial or general industrial** workspace ~~in the B-use class~~, with maker space in **light industrial** use class B1(e) prioritised to meet demand.

Where criterion a) is being used to justify the release, the maximum viable replacement of the existing employment floorspace will be sought.

Where criterion b) applies, if within the existing or emerging creative clusters of Harlesden, Wembley Growth Area, Willesden Green, Alperton Growth Area, Kilburn, Kensal Green, Neasden, Queen’s Park, Burnt Oak Colindale Growth Area, and Church End Growth Area, affordable workspace is to be provided on-site. Elsewhere, if affordable workspace is considered unlikely to successful, financial contributions will be secured to provide equivalent affordable workspace elsewhere.

Work-Live units will be acceptable where they are managed by an organisation committed to their use primarily for employment, as evidenced by a management plan. Loss of Work-Live units to residential will be resisted.

Justification: For clarity and consistency with the London Plan.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	++	+	+	+	+	+	-	+	0	?	+	0	0	0	+	+	0	+	+	+	0	+
Post hearing	+	+	++	+	+	+	+	+	-	+	0	?	+	0	0	0	+	+	0	+	+	+	0	+

Explanation of post-hearing scoring: No change. The policy has been reworded to provide more explicit guidance around when existing uses are unviable. Release of employment floorspace to residential is still only considered under specific circumstances, with the primary policy emphasis being on intensification of employment floorspace within specified use classes. As such, it is considered that the policy will continue to have a positive impact upon the availability of workspace, and jobs within the borough, with respect to SA criteria’s EC1 and EC2.

6.5 - Heritage and Culture

Policy BHC5 (Public Houses)

Policy and modifications:

Amend first paragraph of policy to read:

The Council will support **recognises the important role that pubs can have in contributing to the borough’s character and their role as community assets. New public houses will be supported in town centres.** The loss of public houses only where **will be resisted unless the following can be adequately demonstrated.**

Amend part a) to read:

- a) its continued use as a pub or as an alternative community facility ~~within the D1 use class~~ is not economically viable as demonstrated by meeting the marketing requirements as set out in paragraph 6.5.39;

Justification: To have a more positive wording around the role of public houses and reworded for clarity and consistency with new Use Class.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	0	0	+	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	+	0	0	0
Post hearing	+	0	0	+	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	+	0	0	0

Explanation of post-hearing scoring: The policy now takes a more positive approach with regards to the delivery of pubs, which are now explicitly supported within town centres. Although supportive of the delivery of pubs, it is not anticipated that delivery will be increased to such an extent that the relevant criteria (S4, S6, S7) would be impacted sufficiently so as to increase their scores.

6.6 – Green Infrastructure

Policy BGI1 (Green and Blue Infrastructure in Brent)

Policy and modifications:

Amend first part of policy to read:

The council will expect the provision of additional public open space as set out in Growth Area policies.

Major **residential** developments outside Growth Areas ~~will be expected to provide 0.81 sqm of public open space per resident in the following manner: provision will be on-site~~ **will address current and future needs:**

- a) in **the wards with a public open space deficiency of** Alperton, Brondesbury Park, Dudden Hill, Harlesden, Kensal Green, Kilburn, Mapesbury, Queens Park, Queensbury, Tokyngton, Wembley and Willesden Green provision will be **by-maximising the on-site provision of a range of publicly accessible open spaces for a range of users:**
- b) In the rest of the borough, provision will be on-site unless the size and typology of space that the development generates a need for, with the exception of a Local Area of Play, is already within 400 metres by a direct and safe walking route.

Where public open space is not being provided on site, a financial contribution will be sought to improving the quality and/or accessibility of existing open space provision.

The provision of 'meanwhile uses', such as pocket parks and community gardens on parts of sites that are likely to be otherwise vacant for long periods will be sought in association with development proposals.

Justification: For clarity and to avoid repetition, the need for provision of public open space has been set out in all Growth Area policies. As such, based on the evidence-base (Open Space, Sports and Recreation Study) – there is adequate over-provision of open space compared to the national FIT standard, therefore the standard has been removed to only reflect the need in wards with deficiency based on accessibility/proximity that are not in the Growth Area boundaries.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	+	+	+/-	+	?	+	?	+	?	++	+	++	+	+	+	+	+	++	+	+	?	?	n/a	+/-
Post hearing	+	+	+/-	+	?	+	?	+	?	++	+	++	+	+	+	+	+	++	+	+	?	?	n/a	+/-

Explanation of post-hearing scoring: The policy regards the provision and accessibility of open space. This impacts upon a range of SA criteria, including S2 (health and wellbeing), S7 (accessibility), and most environmental criteria, with particular emphasis on EN11 (open space). Given the evidence, the policy takes a more pragmatic approach toward the delivery of open space within the borough, focusing upon its greater provision within growth areas where need is going to increase, and areas of deficiency. Major developments outside of growth areas now need to meet current and future needs, as opposed to delivering a particular standard on site. This is likely to result in a reduced delivery in these areas, particularly in those where there is currently not a deficiency. This has been considered on balance to reflect the need to adopt deliverable policies when considering impacts upon viability. On the whole the policy is still considered to result in positive outcomes with regards to the delivery of open space given the strong requirement for meeting the needs generated by development on site where possible. As such, the amendments are not considered to impact upon the SA criteria.

6.7 - Sustainable Infrastructure

Policy BSUI3 (Managing Flood Risk)

Policy and modifications:

Amend first paragraph of policy to read:

Proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. **Proposed development must pass the sequential and exceptions test as required by national policy.** The design and layout of proposals requiring a Flood Risk Assessment **as set out in paragraph 6.7.37** must contribute to flood risk management and reduction and:

Amend last paragraph of policy to read:

Opportunities will be sought from the redevelopment of sites in functional floodplain (flood zone 3b) to restore the natural function and storage capacity of the floodplain. Proposals that **result in an increase** ~~involve the loss of functional floodplain or otherwise would constrain its~~ **in** natural ~~function, by~~ ~~impeding flow or reducing~~ **flood** storage capacity **and the environmental quality of the watercourse**, will be **encouraged** ~~resisted~~.

Justification: Reference the need for sequential test on flooding as sought by Environment Agency and provide clarity by reference to paragraph that sets out when a FRA will be required. To also provide a positive policy approach to encouraging development related to positive impacts on flood storage and environmental quality.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	0	0	?	n/a	n/a	n/a	n/a	?	n/a	+	0	0	0	n/a	+	+	n/a	0	++	+	n/a	n/a	n/a	n/a
Post hearing	0	0	?	n/a	n/a	n/a	n/a	?	n/a	+	0	0	0	n/a	+	+	n/a	0	++	+	n/a	n/a	n/a	n/a

Explanation of post-hearing scoring: New policy prescriptions included to accord with national policy. These would have been followed without explicit inclusion within local policy, however, are included for clarity and to ensure stakeholders are aware that Brent does not intend to deviate from this approach. As such, no impacts to the sustainability criteria scores are anticipated.

6.8 - Transport

BT1 (Sustainable Travel Choice)

Policy and modifications:

Amend 'Active Travel' part c) to read:

- c) provide for and make contributions towards connected, high quality, convenient and safe cycle routes and facilities in accordance with the Brent Cycling Strategy, including cycle parking, in line with or exceeding **London Plan standards and** TfL and WestTrans design standards, the implementation of new cycleways, and a borough wide cycle hire scheme;

Amend part k) to read:

Clean Technology

- k) **support the bus network in Brent by identifying and implementing bus priority measures to improve coverage and journey time reliability; maintaining existing coverage and improving connectivity to areas of the borough with limited public transport access, of the bus network and enable and improved bus interchange facilities;**

Insert title before part l) to read:

Clean Technology

- l) increase coverage of Electric Vehicle charging points across the borough.

Justification: Clarity on standards that will apply, support for bus network; also, title moved down as that point should be part of ‘sustainable travel’ not ‘clean technology’

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	++	+	+	+	+	0	?	++	0	+	?	+	+	0	+	+	0	0	+	+	+	+	0	++
Post hearing	++	+	+	+	+	0	+	++	0	+	?	+	+	0	+	+	0	0	+	+	+	+	0	++

Explanation of post-hearing scoring: The amendment will encourage the wider accessibility of public transport across the borough. As such it will enable a greater percentage of Brent’s residents to travel by public transport, and access essential facilities. It is anticipated that this will have a positive impact on criteria S7 (accessibility). Again, this is likely to benefit a number of protected characteristics, including age, sex, and disability, enabling homes to be more easily accessible to a range of users in a safe environment.

BT2 (Parking and Car Free Development)

Policy and modifications:

Amend first paragraph of the policy to read:

Developments should provide parking consistent with parking standards in Appendix 4. Car parking standards are the maximum and car free development ~~will be encouraged where an existing Controlled Parking Zone (CPZ) is in place or can be achieved.~~ **should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking.**

Contributions secured through a planning obligation to existing and new car clubs, bike clubs and pool car and bike schemes in the borough will be strongly encouraged in place of private parking in developments.

Justification: To ensure policy accords with London Plan policy T6- Car Parking

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	0	+	0	+	0	0	0	+	0	+	+	+	+	0	+	0	0	0	+	0	0	0	0	0
Post hearing	0	+	0	+	0	0	0	+	0	+	+	+	+	0	+	0	0	0	+	0	0	0	0	0

Explanation of post-hearing scoring: This policy has the greatest impact upon criterion EN1 (Traffic). The policy is now worded so as to allow greater flexibility on the delivery of car free developments. The removed requirement for Controlled Parking Zones (CPZ's) to be in place or achievable has been removed. In reality, the Council will continue to secure CPZ's where necessary, and that this is likely to be possible across the borough in areas identified as most appropriate for the delivery of housing. As such, the amended wording is unlikely to result in unconstrained parking and car ownership, and is therefore not foreseen to impact on the SA criteria.

Policy BT3 (Freight and Servicing, provision and Protection of Freight Facilities)

Policy and modifications:

Amend part of the policy to read:

PROVISION AND PROTECTION OF FREIGHT FACILITIES

Development that would generate significant movement of goods or materials, both during construction and in operation, should minimise the movement of goods and materials by road. **Freight consolidation through maximising the use of the capacity of vehicles entering and exiting a site and** the use of more sustainable alternatives, i.e. by rail and canal, **and pursuit of best practice in technical innovation to consolidate delivery and construction transport** is encouraged.

For longer distance movements, the provision of sidings within suitable new developments adjoining railway lines is supported. Warehousing development, adjoining rail lines where rail access can be provided, should include sidings.

Existing sidings **and sites adjacent to them or the canal with the potential for rail freight use** will be protected where these are adaptable to serve anticipated needs. **Development proposals which would conflict with the effective operation of these facilities will not be permitted unless:**

- a) appropriate mitigation is provided to ensure it will not place unreasonable restrictions on the effective operation of these facilities; or**
- b) the existing facility can be satisfactorily relocated within the development proposals in terms of operational requirements and environmental criteria; or**
- c) the facility is replaced in an appropriate alternative location.**

Justification: Greater clarity on freight consolidation and protection of facilities.

IIA Objective Scoring:

Criteria	S1	S2	S3	S4	S5	S6	S7	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9	EN10	EN11	EN12	EC1	EC2	EC3	EC4	EC5
Submission	0	+	0	0	0	0	+	+	0	0	+	0	0	0	+	0	0	0	0	+	0	0	+	0
Post hearing	0	+	0	0	0	0	+	+	0	0	+	0	0	0	+	0	0	0	0	+	0	0	+	+

Explanation of post-hearing scoring: These amendments give greater weight to the consolidation of freight, and the continued use of freight infrastructures. Amendments will therefore positively impact criteria's EN1 (traffic), EN4 (environmental health), EN8 (climate change mitigation), and EC5 (efficient infrastructure). All bar EC5 already have scores reflective of the policies potential impact, including those implicated by the amendments. It is anticipated that criteria EC5 will be positively impacted by ensure the continued use of essential existing freight infrastructures, and their greater utilisation.

Conclusion

Altogether 81 policies have been reassessed against the Sustainability Appraisal criteria due to the proposal of new modifications which have the potential to impact upon the sustainability appraisal criteria. Out of these, only 17 have resulted in a change in their previous scores. These have been summarised in table 1 below. They largely relate to the proposed increase in delivery of homes, or the delivery of new open space and social infrastructures as for the Place policies and site allocations. A number of theme policies have received amended scores, including BH2 which now encourages development in high PTAL locations, and BT3, which is now more encouraging of freight consolidation and the retention/ better utilisation of freight infrastructures.

The only instances in which scores were reduced were implemented in order to correct previously incorrect scores. This relates specifically to criterion EN2a (avoiding conflict with waste sites), and site allocations BCSA4, BCSA6, BCSA9, BCSA12, and BEGA1 which were all amended down from neutral (0) negative (-) or significantly negative (--). This is to reflect their proximity to existing waste sites, and land identified as appropriate for their potential future delivery. This change in score is to correct the scoring, and does not reflect any newly proposed modifications to the Plan. It is considered that as these existing sites are likely to be re-provided elsewhere within the local area, at a more appropriate location which will not detrimentally impact upon existing or proposed receptors, that although these sites score negatively in this respect, that these impacts will not be present for the longer term when the sites are occupied for residential uses.

In addition to the assessment of existing policy amendments, the main modifications also proposed 4 new policies, in addition to 8 new Good Growth criteria, each receiving a full appraisal in this document. Three of these new policies were Growth Area policies, and were produced for the new Growth Areas of Neasden Stations (BEGA1a), Staples Corner (BEGA2a), and Northwick Park (BNWGA1a). These policies are essentially broader versions of their Site Specific Allocation counterparts, which have already been appraised and considered. On the whole, these policies are anticipated to provide positive and sustainable outcomes for residents of all kinds, helping to better facilitate their comprehensive delivery in accordance with the principles of Good Growth.

The fourth new policy is BCSA20 (Wembley Park Station North). This was previously included as part of BCSA7 (Wembley Park Station South), which has since received planning permission. As such it was seen as sensible to separate these two land parcels into two separate site allocation policies with different considerations and prescriptions. As with the new Growth Area policies, this new policy was largely considered as part of BCSA7 in the Submission version of the IIA.

Finally, the Good Growth objectives includes 8 new criteria which were seen as having the potential to have new impacts in terms of the sustainability criteria. These look to ensure the greater delivery of new essential social infrastructures, including sports facilities and green/ blue infrastructure enhancements. The other new criteria relate to the delivery of other supporting infrastructures, including serviced accommodation, offices, and support for entrepreneurialism. These have all received positive scores throughout their relevant sustainability criteria's, and will support the Council in the delivery of sustainable Places across the Borough.

To summarise, the proposed main modifications for the post hearings draft Brent Local Plan are considered to have largely positive impacts as they relate to the sustainability criteria, and people's protected characteristics.

Table 1: Summary of proposed policy main modification impacts to sustainability appraisal scores where a change has occurred (green = positive, orange = minor negative).

Policy	Amendment	Impacted criteria's	Explanation
BP1 (Central Place)	Requirement for new open space.	S2 (+ to ++), EN5 (+ to ++).	It is anticipated that the delivery of additional open space facilities will increase both criteria's S2 (health and wellbeing), and EN5 (biodiversity). New parks are likely to increase people's mental and physical well-being, as well as providing places of refuge for biodiversity.
BCSA4 (Fifth Way/ Euro Car Parts)	Proximity to waste site	EN2a (0 to --)	Amendment for correction only. Site is within 300m of an existing waste site which, as a potentially disruptive use, can impact upon proposed future residential receptors at this site.
BCSA6 (Watkin Road)	Proximity to waste site	EN2a (0 to --)	Amendment for correction only. Site is within 300m of an existing waste site which, as a potentially disruptive use, can impact upon proposed future residential receptors at this site.
BCSA9 (First Way)	Proximity to waste site	EN2a (0 to --)	Amendment for correction only. Site is within 300m of an existing waste site which, as a potentially disruptive use, can impact upon proposed future residential receptors at this site.
BCSA12 (Land to South of South Way)	Proximity to waste site	EN2a (0 to -)	Amendment for correction only. Site is adjacent to SIL which is identified as being appropriate for waste uses, which could impact upon proposed receptors at this site if delivered.
BP2 (East Place)	Specified housing delivery.	S3 (+ to ++)	It is anticipated that the stronger emphasis on housing delivery within this place will help achieve a higher rate of delivery, thus making housing more accessible to all.
BEGA1 (Neasden Stations Growth Area)	Proximity to waste site	EN2a (0 to --)	Amendment for correction only. Site is within 300m of an existing waste site which, as a potentially disruptive use, can impact upon proposed future residential receptors at this site.
BP3 (North Place)	Specified housing delivery.	S3 (+ to ++)	It is anticipated that the stronger emphasis on housing delivery within this place will help achieve a higher rate of delivery, thus making housing more accessible to all.
BNGA1 (Burnt Oak and Colindale Growth Area)	Requirement for new open space.	S2 (+ to ++), EN5 (+ to ++).	It is anticipated that the delivery of additional open space facilities will increase both criteria's S2 (health and wellbeing), and EN5 (biodiversity). New parks are likely to increase peoples' mental and physical well-being, as well as providing places of refuge for biodiversity.

BP5 (South Place)	Specified housing delivery.	S3 (+ to ++)	It is anticipated that the stronger emphasis on housing delivery within this place will help achieve a higher rate of delivery, thus making housing more accessible to all.
BP6 (South East Place)	Increased housing delivery.	S3 (+ to ++)	It is anticipated that the high number of housing units to be delivered within this place will help achieve a higher rate of delivery, thus making housing more accessible to all.
BESA12 (Wordsworth, Masefield, and part of South Kilburn Open Space)	Requirement for re-provision of MUGA)	S2a (+ to ++)	It is anticipated that the re-provision of a MUGA on site will increase criterion S2a (health and well-being) to significantly positive due to the provision of further sports facilities.
BP7 (South West Place)	Specified housing delivery.	S3 (+ to ++)	It is anticipated that the stronger emphasis on housing delivery within this place will help achieve a higher rate of delivery, thus making housing more accessible to all.
BSWGA1 (Alperton Growth Area)	Requirement for new open space.	S2 (+ to ++), EN5 (+ to ++).	It is anticipated that the delivery of additional open space facilities will increase both criteria's S2 (health and wellbeing), and EN5 (biodiversity). New parks are likely to increase people's mental and physical well-being, as well as providing places of refuge for biodiversity.
BH2 (Priority areas for additional housing provision within Brent)	Identification of high PTAL areas as appropriate for new residential development.	S7 (+ to ++), EN1 (+ to ++)	It is considered that the delivery of housing in high PTAL locations will positively impact criteria S7 (accessibility) and EN1 (traffic). More housing is likely to be delivered in areas close to public transport nodes, reducing dependence of personal vehicles, and increasing their accessibility to essential infrastructures such as are provided around LUL stations and within town centres.
BT1 (Sustainable Travel Choice)	Improve supportive wording around the provision and	S7 (? To +)	The amendment will encourage the wider accessibility of public transport across the borough. As such it will enable a greater percentage of Brent's residents to travel by public transport, and access essential facilities.

	enhancement of bus routes		
BT3 (Freight and Servicing, provision and Protection of Freight Facilities)	Greater weight to the consolidation of freight, and the continued use of freight infrastructures.	EC5 (? To +)	These amendments give greater weight to the consolidation of freight, and the continued use of freight infrastructures. Amendments will therefore positively impact criteria's EN1 (traffic), EN4 (environmental health), EN8 (climate change mitigation), and EC5 (efficient infrastructure). All bar EC5 already have scores reflective of the policies potential impact, including those implicated by the amendments. It is anticipated that criteria EC5 will be positively impacted by ensure the continued use of essential existing freight infrastructures, and their greater utilisation.

Appendix A – Site Allocation Appraisal Matrix

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
S1a: Area is within a London Strategic Area for Regeneration.	Site of 1 hectare or more within a London Strategic Area for Regeneration	Site of less than 1 hectare within a London Strategic Area for Regeneration	Site boundary within 100 metres of a London Strategic Area for Regeneration	NA	Site boundary 100 metres or more from a London Strategic Area for Regeneration	NA
S2a: Walking distance to healthcare facilities.	NA	Within 800m of a healthcare facility	NA	NA	More than 800m from a healthcare facility	NA
S2b: Walking distance to open space and sports facilities.	Within 800m of an area of open space <u>and</u> within 800m of a sports facility/ leisure centre?	Within 800m of an area of open space <u>or</u> within 800m of a sports facility/leisure centre	NA	NA	More than 800m from any area of open space or sports facility/ leisure centre	NA
S3a: Housing Provision Assessment.	100+ homes	10-99homes	9 or fewer homes gained or lost/potential displaced	NA	10-99homes lost/potential displaced	100+ homes lost/potential displaced
Crime and Preventing and Community Safety	Area currently associated with high levels of crime related to		Area currently associated with average levels of crime related to		Area currently associated with low levels of crime related to	

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
	layout/ uses/ social mix		layout/ uses/ social mix		layout/ uses/ social mix	
S7a: Walking Distance to Services and Facilities.	Within 800m of a town centre, <u>and</u> 2,000m of an employment area	Within 800m of a town centre	NA	NA	More than 800m from a town centre	More than 800m from a local centre <u>and</u> more than 2,000m from an employment area
S7b: Walking distance to schools.	Within 1,000m of a secondary school <u>and</u> 500m of a primary school	Within 500m of a primary school <u>and</u> more than 1,000m from a secondary school	NA	NA	More than 500m from a primary school <u>and</u> within 2,000m of a secondary school	More than 500m from a primary school <u>and</u> more than 2,000m from a secondary school
EN1a: PTAL Score of Site taking account	PTAL, 6a & 6b	PTAL 5,4	PTAL 3		PTAL 2	PTAL 1, 0

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
of known public transport improvements.						
EN2a: Avoiding conflicts with waste management sites.	NA	NA	All other sites	NA	Within 300m of an industrial area in which the WLWP considers waste uses to be acceptable	Within 300m of an active or committed waste facility
EN3a	NA	Opportunity to enhance setting of watercourse/ provide better access/ naturalisation	All other sites			

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
EN4a: Exposure to low air quality or noise.			Not within an AQMA or within 50m of an A road, motorway, railway line, or industrial area		Partly within an AQMA <u>or</u> within 50m of an A road, motorway, railway line, or industrial area	Wholly within an AQMA <u>and</u> within 50m of an A road, motorway, railway line, or industrial area
EN4b: Contribution to road traffic increases within AQMAs.	NA	NA	All sites, within PTAL 4-6		All sites, within PTAL 3	All sites within PTAL 0-2
EN4c: Within an area of contaminated land.	NA	Not within an area of contaminated land	NA	Within an area of contaminated land	NA	NA
EN5a: Within an area of recognised ecological value.			Not within a recognised area of ecological value		Within London level ecological value designation	Within national level ecological value designation
EN7a: Qualitative Assessment of Potential Impact on Heritage/			Not designated.	Carried out by Council's conservation officer.		

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
Cultural Significance.						
EN11a Presence of brownfield land, derelict buildings, and open space.	Redevelopment of derelict and/ or disused brownfield site	Redevelopment of brownfield site currently in use but creating a poor environment	Redevelopment of brownfield land that is in use but does not have any poor environment issues NA	NA	Loss of greenfield land that is not designated as open space	Loss of all or part of designated open space
EN12a: Flood Risk From Rivers.	NA	All of site within Flood Zone 1	Smaller proportion (1-50%) within Flood Zone 2	NA	Majority (>50%) within Flood Zone 2 or Smaller proportion (1-50%) within Flood Zone 3	Majority (>50%) within Flood Zone 3
EN12b: Flood Risk from Ground Water.	NA	All of site is within a 'low' or no groundwater flood risk area	Smaller proportion (1-50%) within a 'moderate' groundwater flood risk area	NA	Majority (>50%) within 'moderate' groundwater flood risk area <u>or</u> smaller proportion (1-50%) within 'high' or 'very high'	Majority (>50%) within 'high' or 'very high' groundwater flood risk area

Objective Outputs Assessment	Significant Positive ++	Minor Positive +	Neutral or Mixed +/- or 0	Unknown Effects ?	Minor Negative -	Significant Negative --
					groundwater flood risk area	
EN12c: Flood Risk from Surface Water.	NA	None of the site is located within a 1 in 100 year surface water flood risk area (all other sites)	NA	NA	Smaller proportion (1-50%) within 1 in 100 year surface water flood risk area	Majority (>50%) within 1 in 100 year surface water flood risk area
EC2a: Employment Floorspace Change	> +4,500 sqm. gain	< 4,500 sqm. And > 1000 sqm. gain	< 1000 sqm. gain and < - 1000 sq.m.loss	NA	>-1000 sqm. and <-4500 sqm. loss	>-4,500 sqm. Loss

Appendix B – IIA policy assessment framework

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
Social			
Encouraging prosperity, and reducing inequalities and social exclusion S1. To promote social inclusion, narrow inequalities	<ul style="list-style-type: none"> Will the policy/project reduce poverty and social exclusion in those areas most affected? Will it improve affordability of essential services? 	<ul style="list-style-type: none"> The borough's ranking on the Indices of multiple deprivations (IMD) Number of households in fuel poverty 	Reduce the area of the Borough within the lowest 20% IMD category from 2019 levels

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
and address poverty for all communities within the borough.	<ul style="list-style-type: none"> • Will it promote social cohesion and integration? • Will it have a positive impact on reducing fuel poverty/ associated deaths? • Does it remove or reduce disadvantages suffered by people due to their protected characteristics? 	<ul style="list-style-type: none"> • % of children in income deprived households 	
<p>Health and Well-being</p> <p>S2: To improve the health of the population and reduce health inequalities through access to necessary healthcare facilities and an environment that promotes physical and mental well-being</p>	<ul style="list-style-type: none"> • Does it protect and enhance access to the provision of health care/community/open space/leisure facilities? • Will it reduce death rates? • Will it promote physical activity or increase participation in sport and leisure activities for all low participation groups? • Will it promote opportunities for better food choices? • Will it enhance mental well-being through a safer, more stimulating and pleasant natural and built environment? 	<ul style="list-style-type: none"> • Levels of obesity within the borough • Open Space deficient areas • Life expectancy – borough wide and at ward level • % of population participating in 30 minutes of moderate intensity sport • Healthy Street Scores • Mortality Rate • Number of patients registered at GP surgery • Number of FTE GPs within Brent • Proportion of the borough deficient in relation to local sport facilities 	<p>Improve life expectancy overall and reduce the difference between the average life expectancy of the best and worst performing areas of the borough.</p> <p>Reduction in the level of obesity.</p> <p>Increase in the percentage of the borough's population that are considered to be 'Active'.</p>

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<ul style="list-style-type: none"> • Will it reduce health inequalities? • Does it affect specific sub-groups disproportionately compared with the whole population? 		
<p>Housing</p> <p>S3: To provide everybody with the opportunity to live in a home which is suitable to their identified needs</p>	<ul style="list-style-type: none"> • Will it increase access to good quality and affordable housing? • Will it encourage mixed use and range of housing tenure types to meet the varied and in some cases specialist needs of the population? • Will it reduce the number of unfit homes? • Will it reduce homelessness/ people living in temporary accommodation? • Will it provide an opportunity to maintain or increase owner-occupier levels? 	<ul style="list-style-type: none"> • Net additional dwellings during financial year • Number and % of housing completions that were affordable during financial year • Number of specialist accommodation homes built during financial year • Proportion of family sized (3+ beds) homes • Proportion of homes split by different tenures within the Census • Number of people homeless/in temporary accommodation 	<ul style="list-style-type: none"> • The 2018 SHMA identifies that the full objectively assessed for housing in Brent is 48,000 dwellings over the Plan period 2016-41, which is equivalent to 1920 dwellings per annum. This includes the objectively assessed need for affordable housing of 22,100 dwellings over the same period, equivalent to an average of 884 dwellings per annum. • Originally, the new draft London Plan indicated that over a 10 year period, Brent needed to provide 29,150 dwellings per annum. However, this has since been reduced to 23,250 (2325 units per

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
			<p>annum) in the Intend to Publish Version.</p> <ul style="list-style-type: none"> • 50% of new homes within affordable tenures • 25% of new homes 3+ beds • Maintain or increase owner-occupation proportions at or above 2011 levels • Older people's accommodation increased at London Plan target rates • Reduce homeless and temporary accommodation numbers from 2017 levels
<p>Quality of surroundings</p> <p>S4: To provide a safe, high quality and healthy environment for the borough residents to live, work and enjoy.</p>	<ul style="list-style-type: none"> • Will it improve the satisfaction of people with their neighbourhoods as places to live? • Will it improve residents' amenity and sense of place? • Will it reduce actual noise levels? • Will it reduce noise concerns? 	<ul style="list-style-type: none"> • Noise levels within the borough • Healthy Street Scores • Accessibility to open space? 	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
<p>Crime and Preventing and Community Safety</p> <p>S5: To enhance community safety by reducing and preventing crime, anti-social activity and the perception of potential harm to personal safety</p>	<ul style="list-style-type: none"> • Will it reduce actual levels of crime? • Will it reduce the fear of crime? • Will it reduce actual and perceived threats to personal safety for example from fire or terrorism? 	<ul style="list-style-type: none"> • Number of notifiable offences during financial year • Anti-social behaviour cases open during financial year • Brent Crime rate • Number of gangs within the borough • % of population who feel safe walking outside after dark 	
<p>Community Identity</p> <p>S6: To recognise and provide for Brent's population diversity while encouraging a shared sense of community and cultural identity/belonging, as well as engagement in local, high quality community services and facilities</p>	<ul style="list-style-type: none"> • Will it meet or, if subject to change, have the potential to meet a specific diversity need that is not currently catered for in the borough? • Will it foster a sense of pride in area? • Will it increase the ability of people to influence decisions? • Will it improve ethnic relations? • Will it encourage communication between different communities in order to improve understanding of different needs and concerns? 	<ul style="list-style-type: none"> • Number of community facilities within the borough 	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<ul style="list-style-type: none"> Will it encourage people to respect and value their contribution to society? 		
<p>Accessibility</p> <p>S7: To maintain and enhance the role and vitality and viability of Brent's town centres and where possible improve accessibility to a range of services and facilities, such as healthcare and education, especially for the most vulnerable</p>	<ul style="list-style-type: none"> Will the development maintain or enhance the role and vitality and viability of Brent's town centre? Will it improve accessibility to key local services? Will it improve the level of investment in key community services? Will it make access more affordable? Will it make access easier for those without access to a car? 	<ul style="list-style-type: none"> Proportion of new homes or floorspace within 800 metres of a town centre Footfall in Brent town centres Level of ground floor vacancies in Brent town centres Average rent for retail and other uses within Brent's town centres Number of patients registered at a GP practice Number of schools within the borough Open space deficient areas 	<ul style="list-style-type: none"> Reduced levels of vacancy within the borough's town centres Increase footfall in major town centres
Environmental			
<p>Traffic</p> <p>EN1: To reduce the effect of traffic on the environment through actively reducing the need to travel and promoting</p>	<ul style="list-style-type: none"> Will it reduce the need to travel? Will it reduce traffic volumes? Will it increase the proportion of journeys using modes other than the car? 	<ul style="list-style-type: none"> Modal share Proportion of new homes and other floorspace within areas of PTAL scores of 4 or more Vehicle km travelled by mode each year PTAL levels 	<ul style="list-style-type: none"> Increase modal share of walking to 30% by 2021/22 Increase modal share of cycling to 3% by 2021

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
sustainable modes of movement	<ul style="list-style-type: none"> • Will it encourage walking and cycling? 	<ul style="list-style-type: none"> • Km of cycle and walking routes within the borough • Car Parking Spaces created during financial year • Proportion of underground/over ground stations with step free access. 	
<p>Waste Management</p> <p>EN2: To reduce the production of waste and use of non-renewable materials and maximising re-use and recycling.</p>	<ul style="list-style-type: none"> • Will it minimise the production of waste and use of non-renewable materials? • Will it promote recycling? • Where reuse or recycling is not possible will it encourage potential for energy from waste to minimise volumes of land-fill? 	<ul style="list-style-type: none"> • Recycling and composting rates • Amount of waste collected during financial year 	<ul style="list-style-type: none"> • The new draft London Plan (2019) (Intend to Publish) contains the following figures for projected waste arising: <ul style="list-style-type: none"> • 2021 – household, commercial and industrial waste – 259,000 tonnes • 2041 – household, commercial and industrial waste – 274,000 tonnes
<p>Water Quality and Resources</p> <p>EN3: To improve quality of the water bodies within the borough to 'good', protect ground water quality, conserve</p>	<ul style="list-style-type: none"> • Will it improve the quality of inland water? • Will it reduce water consumption? • Will it reduce combined sewer overflow events? 	<ul style="list-style-type: none"> • Water Consumption Levels • Water Quality Levels • WFD status of waterbodies in the borough 	<ul style="list-style-type: none"> • All water bodies to achieve a 'good' status by 2027

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
water resources and provide for sustainable sources of water supply.			
<p>Environmental Health</p> <p>EN4: Minimise air, noise and light pollution and improve existing areas of poor air quality and contaminated land.</p>	<ul style="list-style-type: none"> • Will it improve air quality? • Will it reduce noise pollution? • Will it reduce light pollution? • Will it help to achieve the objectives of the Air Quality Management Plan? • Will it reduce emissions of key pollutants? 	<ul style="list-style-type: none"> • Amount of contaminated land remediated • Status of water bodies within the borough • % of borough within AQMA • Noise levels within the borough 	
<p>Biodiversity</p> <p>EN5: To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna, water bodies and increase opportunities for people to access nature in all areas of the borough</p>	<ul style="list-style-type: none"> • Will it conserve and enhance habitats of borough or local importance and create habitats in areas of deficiency? • Will it promote naturalisation and enhancement of rivers? • Will it conserve and enhance species diversity; and in particular avoid harm to protected species? • Will it maintain and enhance woodland cover and management? 	<ul style="list-style-type: none"> • Number of SINC's within the borough • Changes in the areas and populations of biodiversity importance • Status of water bodies within the borough • Number of TPOs created during financial year • Number of TPOs within the borough • Proportion of developments that incorporate green roofs or other features that have 	<ul style="list-style-type: none"> • All water bodies to achieve a 'good' status by 2027 • Development schemes within the borough achieve a net gain for biodiversity

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<ul style="list-style-type: none"> • Will it encourage protection of and increase the number of trees? • Will it improve access to the borough's biodiversity? • Will it improve connectivity between the boroughs habitats by creating a network of green infrastructure? 	<ul style="list-style-type: none"> • potential to enhance biodiversity • DEFRA Biodiversity calculator for developments and Borough schemes. • Mapping exercise every 3-5 years of newly created habitat to track efforts of improved landscape connectivity won through development and schemes. • River morphology surveys through the Brent Catchment Partnership to qualify the natural state and functioning of the Brent's rivers. 	
<p>Landscape and Townscape</p> <p>EN6: Create, enhance and maintain attractive and clean environments including protecting and enhancing the borough's landscape and townscape.</p>	<ul style="list-style-type: none"> • Will it enhance the quality of priority areas for townscape and public realm enhancements? • Will it minimise visual intrusion and protect views? • Will it decrease litter in urban areas and open spaces? 	<ul style="list-style-type: none"> • Number of Anti-Social Behaviour cases opened for littering • Developments occurring in priority areas for townscape and public realm enhancements • Quality status of the borough's open spaces (Green Flag) 	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
<p>Historic Environment and Cultural Assets</p> <p>EN7: To protect and where appropriate enhance the historic environment and cultural assets.</p>	<ul style="list-style-type: none"> • Will it protect and enhance Conservation Areas and other sites? • Will it protect and enhance features and areas of historical and cultural value, such as assets of community value? • Will it protect listed buildings? • Will it help preserve and record archaeological features? 	<ul style="list-style-type: none"> • Number of buildings on heritage at risk register • Number of listed buildings • Number of conservation areas • Number of buildings on the borough's Local List • Changes in the number of public houses • Changes in number of music venues, nightclubs, cinemas, theatres and art galleries 	<ul style="list-style-type: none"> • No buildings on the heritage at risk register
<p>Climate Change Mitigation</p> <p>EN8: To mitigate against the impacts of climate change, predominately through reducing greenhouse gas emissions</p>	<ul style="list-style-type: none"> • Will it reduce emissions of greenhouse gases by reducing energy consumption? • Will it lead to an increased proportion of energy needs being met from local district heating and energy networks or renewables sources? • Will it reduce emission of ozone depleting substances? 	<ul style="list-style-type: none"> • Renewable energy installed by type • Proportion of dwellings/other floorspace connect to combined heat and power of district heating networks • Greenhouse gas emissions, by source, within the borough • Progress made against the actions contained within the Council's Climate Change Strategy 	<ul style="list-style-type: none"> • National target or reducing greenhouse gas emissions by 80% by 2050 • In 2017, the Mayor of London committed London to being zero carbon by 2050. This target is applicable to Brent.

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
<p>Climate Change Adaption</p> <p>EN9: Promote measures which adapt against the impact of climate change</p>	<ul style="list-style-type: none"> • Will it reduce the risk of damage to property from storm events? • Will it maintain or ideally reduce the potential for over-heating/urban heat island effect? 	<ul style="list-style-type: none"> • Renewable energy installed by type • SuDS installed during financial year • Number of developments built within a flood zone area 	<ul style="list-style-type: none"> • National target or reducing greenhouse gas emissions by 80% by 2050 • In 2017, the Mayor of London committed London to being zero carbon by 2050. This target is applicable to Brent.
<p>Land and Soil</p> <p>EN10: To safeguard and conserve soil quality and quantity within the borough</p>	<ul style="list-style-type: none"> • Will it minimise development on Greenfield sites? • Will it ensure that where possible; new development occurs on derelict, vacant and underused previously developed land and buildings? • Will it ensure land is remediated as appropriate? • Will it minimise the loss of soils to development? • Will it maintain and enhance soil quality? • Will it reduce the risk of subsidence? 	<ul style="list-style-type: none"> • Soil quality within the borough • Number of LGIS within the borough 	<ul style="list-style-type: none"> • Protect Barnhill as a Locally Important Geological Site (LGIS)
<p>Open Space</p>	<ul style="list-style-type: none"> • Contribute to addressing areas of open space deficiency? 	<ul style="list-style-type: none"> • Number of open spaces within the borough 	<ul style="list-style-type: none"> • No open space deficient areas within the borough

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
EN11: Protect, enhance, and where possible increase the amount of open spaces that are high quality, easily accessible and multi-functional.	<ul style="list-style-type: none"> • Improve the quality of open space? • Increase the accessibility of an open space? 	<ul style="list-style-type: none"> • Open space deficient areas within the borough • Loss of open space during financial year • Number of open spaces obtaining Green Flag standard or equivalent • Public opinion on open spaces within the borough 	<ul style="list-style-type: none"> • All open spaces are of 'good' or better quality
Flood Risk EN12: To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	<ul style="list-style-type: none"> • Will it avoid areas of flood risk? • Where it cannot avoid risk areas will it minimise the risk of flooding from rivers, watercourses, surface water and sewage to people and property 	<ul style="list-style-type: none"> • Number of applications granted permission within Flood Zone 3 • % of borough located within undefended Flood Zone • Flooding Events 	<ul style="list-style-type: none"> • No or reduced reports of property level flooding during flood events • No applications granted contrary to Environment Agency advice in flood Zone 3
Economic			
Growth and Regeneration EC1: To actively promote sustainable, resilient and inclusive economic growth and regeneration which tangibly benefits Brent residents and the environment	<ul style="list-style-type: none"> • Will it encourage the maintenance and provision of land and premises for identified employment needs? • Will it encourage new business start-ups and opportunities for local people? 	<ul style="list-style-type: none"> • Number of employee jobs within the borough • Number of businesses within the borough • Amount of floor space development for employment by type created during the financial year 	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
	<ul style="list-style-type: none"> • Will it promote regeneration? • Will it reduce disparities within the surrounding areas? • Will it improve business development and enhance productivity? • Will it improve the resilience of business and the local economy? • Will it promote growth in key sectors? • Will it promote growth in key clusters? • Will it enhance the impact of the area as a business location? 	<ul style="list-style-type: none"> • Amount of employment floorspace lost during the financial year 	
<p>Employment</p> <p>EC2: To offer everybody the opportunity for rewarding and satisfying employment /self-employment</p>	<ul style="list-style-type: none"> • Will it reduce short and long-term local unemployment? • Will it provide job opportunities for those most in need of employment? • Will it help to reduce long hours worked 	<ul style="list-style-type: none"> • Unemployment rate within the borough • Employee jobs, by sector, within the borough 	
<p>Investment</p>	<ul style="list-style-type: none"> • Will it reduce commuting? 	<ul style="list-style-type: none"> • Journey times to key employment areas • Mode of travel to work 	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
EC3: To facilitate both indigenous and inward investment within the borough	<ul style="list-style-type: none"> • Will it improve accessibility to work by public transport, walking and cycling? • Will it reduce journey times between key employment areas and key transport interchanges? • Will it facilitate efficiency in freight distribution? 	<ul style="list-style-type: none"> • Number of businesses opened within the borough during financial year • Size of businesses opened within the borough during the financial year 	
<p>Education and Skills</p> <p>EC4: Maximise the potential for everybody to contribute economically through increasing and improving the provision of and access to childcare, education and training facilities, volunteering opportunities and informal employment</p>	<ul style="list-style-type: none"> • Will it improve qualifications and skills of the population? • Will it improve access to high quality educational facilities? • Will it help fill key skill gaps? 	<ul style="list-style-type: none"> • Average grades achieved during financial year for KS2, KS3, KS4 and KS5 • Pupil population of Brent • OFSTED status of schools within Brent • Education space created during financial year • Education space lost during financial year • Demand for primary school and secondary school places within the borough 	

Integrated Impact Assessment Objectives	Criteria	Potential Indicators	Targets
<p>Efficient Infrastructure</p> <p>EC5: To encourage efficient infrastructure to support economic growth</p>	<ul style="list-style-type: none"> • Will it reduce commuting? • Will it improved accessibility to employment places by public transport? • Will it facilitate efficiency in freight distribution? 	<ul style="list-style-type: none"> • Number of km travelled during the financial year by freight vehicles • Amount of freight carried by rail during the financial year • Amount of freight carried by water during the financial year • Number of residents employed within the borough • Mode of transport to work • Proportion of the borough within access to high speed broadband/IT infrastructure to meet modern day requirements 	

Appendix C – Scoring method for the 'likely significant effects' of policies

Symbol	Likely effect against the IIA objectives	Description of effect
++	Significant Positive	Very likely to lead to a significant opportunity/improvement, or a series of long-term improvements, leading to large-scale permanent benefits to the sustainability objective being appraised. The impact is likely to benefit a large area of the borough, or a large proportion of the boroughs residents. The policy/project is like to create a major positive effect that could have cumulative and indirect beneficial impacts and/or improve conditions outside the specific policy or project area – will have positive transboundary effects.
+	Minor Positive	Likely to lead to moderate improvement in both short and long-term, leading to large scale temporary or medium-scale permanent benefits to the objectives being appraised. The impact is likely to be limited to a small area within the borough, or a small proportion of the boroughs residents. The magnitude of the predicted effects of the policy/option will be minor.
0	Neutral	Unlikely to have any beneficial or negative impact/effect on the objective being appraised, either in the present or future.
-	Minor Negative	Likely to lead to moderate damage/loss in both short and long-term, leading to large-scale temporary, or medium scale permanent negative impact on the objective. The impact is likely to be limited to a small area within the borough, or limited to small groups of people. The effects can either be direct or indirect, with the magnitude likely to be minor. It is also likely that it will be possible to mitigate or reverse a minor negative effect through policy or project intervention.
--	Significant Negative	Very likely to lead to significant damage in the long-term, or a series of long-term negative effects, which leads to a large-scale and permanent negative impact on the sustainability objective being appraised. The impact is likely to affect the whole, or large areas of the borough or the majority of the population. The detrimental impacts of the policy/option will be hard to reverse and are unlikely to be easily mitigated through policy or project intervention.

?	Unknown	The effect of a policy/option cannot be, or is not, known or is too unpredictable to assign a conclusive score.
-/+	Mixed	The effect is likely to be a combination of beneficial and detrimental effects, particularly where effects are considered on sub-issues, areas of criteria.
N/A	Not Applicable	This is applied to objectives that will not be affected by the policy/option that is being assessed.

Appendix D – Amendments at Submission Stage in Response to Environment Agency Comments and Associated Amendments to Flooding Criteria of the Site Allocation Sustainability Appraisal.

Site Allocation Reference	Publication Stage EN12a rating (river)	Submission Stage EN12a rating (river)	Publication Stage EN12b rating (groundwater)	Submission Stage EN12b rating (groundwater)	Publication Stage EN12c rating (surface water)	Submission Stage EN12c rating (surface water)
BCSA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA2	Neutral	Neutral	Neutral	Minor Positive	Major Negative	Minor Negative
BCSA3	Major Negative	Major Negative	Neutral	Minor Positive	Major Negative	Major Negative
BCSA4	Neutral	Neutral	Neutral	Minor Positive	Neutral	Minor Negative
BCSA5	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA6	Major Negative	Minor Negative	Neutral	Minor Positive	Major Negative	Minor Negative
BCSA7	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA8	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA9	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA10	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BCSA11	Minor Negative	Minor Negative	Neutral	Minor Positive	Major Negative	Major Negative
BCSA12	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BCSA13	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA15	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BCSA16	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative

Site Allocation Reference	Publication Stage EN12a rating (river)	Submission Stage EN12a rating (river)	Publication Stage EN12b rating (groundwater)	Submission Stage EN12b rating (groundwater)	Publication Stage EN12c rating (surface water)	Submission Stage EN12c rating (surface water)
BCSA18	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BCSA19	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BEGA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BEGA2	Neutral	Neutral	Neutral	Neutral	Minor Negative	Minor Negative
BESA1	Minor Negative	Minor Negative	Neutral	Minor Negative	Neutral	Minor Positive
BESA2	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BESA3	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Positive
BNSA1	Neutral	Minor Positive	Minor Negative	Minor Positive	Minor Negative	Minor Negative
BNSA2	Neutral	Minor Positive	Major Negative	Minor Positive	Minor Negative	Minor Negative
BNSA3	Neutral	Neutral	Minor Negative	Minor Positive	Minor Negative	Minor Negative
BNSA4	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA5	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA6	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA7	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BNSA8	Neutral	Minor Positive	Neutral	Minor Positive	Major Negative	Major Negative
BNWSA1	Neutral	Minor Positive	Minor Negative	Minor Positive	Neutral	Minor Negative
BNWGA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative

Site Allocation Reference	Publication Stage EN12a rating (river)	Submission Stage EN12a rating (river)	Publication Stage EN12b rating (groundwater)	Submission Stage EN12b rating (groundwater)	Publication Stage EN12c rating (surface water)	Submission Stage EN12c rating (surface water)
BSSA2	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA3	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA4	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA5	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BSSA6	Major Negative	Major Negative	Neutral	Minor Negative	Major Negative	Minor Negative
BSSA7	Major Negative	Major Negative	Neutral	Minor Negative	Minor Negative	Minor Negative
BSSA8	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA9	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA10	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BSSA11	Neutral	Minor Positive	Neutral	Minor Negative	Minor Negative	Minor Negative
BSSA12	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Positive
BSSA13	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA15	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA16	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSSA17	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA18	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSSA19	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative

Site Allocation Reference	Publication Stage EN12a rating (river)	Submission Stage EN12a rating (river)	Publication Stage EN12b rating (groundwater)	Submission Stage EN12b rating (groundwater)	Publication Stage EN12c rating (surface water)	Submission Stage EN12c rating (surface water)
BSESA1	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA2	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA3	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA4	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA5	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA6	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA7	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA8	Neutral	Minor Positive	Neutral	Minor Positive	Major Negative	Minor Negative
BSESA9	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA10	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA11	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BSESA12	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA13	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA15	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA16	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA17	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA18	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive

Site Allocation Reference	Publication Stage EN12a rating (river)	Submission Stage EN12a rating (river)	Publication Stage EN12b rating (groundwater)	Submission Stage EN12b rating (groundwater)	Publication Stage EN12c rating (surface water)	Submission Stage EN12c rating (surface water)
BSESA19	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA20	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Positive
BSESA21	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA22	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA23	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA24	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA25	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA26	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA27	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA28	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA29	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BSESA30	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA31	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSESA32	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA33	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSESA34	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BSESA35	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA1	Neutral	Minor Positive	Neutral	Neutral	Minor Negative	Minor Negative

Site Allocation Reference	Publication Stage EN12a rating (river)	Submission Stage EN12a rating (river)	Publication Stage EN12b rating (groundwater)	Submission Stage EN12b rating (groundwater)	Publication Stage EN12c rating (surface water)	Submission Stage EN12c rating (surface water)
BSWSA2	Neutral	Minor Positive	Neutral	Neutral	Minor Negative	Minor Negative
BSWSA3	Neutral	Minor Positive	Neutral	Minor Negative	Minor Negative	Minor Negative
BSWSA4	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Negative
BSWSA5	Neutral	Minor Positive	Neutral	Minor Negative	Minor Negative	Minor Negative
BSWSA6	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Negative
BSWSA7	Minor Negative	Minor Negative	Minor Negative	Minor Negative	Minor Negative	Minor Negative
BSWSA8	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA9	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSWSA10	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSWSA11	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA12	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative
BSWSA13	Neutral	Minor Positive	Neutral	Minor Positive	Minor Negative	Minor Negative
BSWSA14	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Positive
BSWSA15	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Negative
BSWSA16	Neutral	Minor Positive	Neutral	Minor Negative	Neutral	Minor Negative
BSWSA17	Neutral	Minor Positive	Neutral	Minor Positive	Neutral	Minor Negative

SCHEDULE OF MAIN MODIFICATIONS OF DRAFT BRENT LOCAL PLAN SUBMITTED FOR EXAMINATION IN MARCH 2020
LONDON BOROUGH OF BRENT

This schedule contains all main modifications to Brent Local Plan to submission version for public consultation, which the Inspectors examining the Plan consider necessary for soundness. All proposed modifications and their reference numbers supersede all previous versions proposed by the Council during the examination process.

The following format has been used to denote the modifications:

Underlined bold text = new text proposed for policy compared to submission version

~~Strikethrough text~~ = text proposed for removal compared to submission version

Underline text = new text proposed for justification text compared to submission version

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM1	2 Introduction	Paras 2.14 – 2.17	<p>Layout of the Brent Local Plan</p> <p>2.14 As indicated earlier, the London Plan contains many detailed strategic policies that are also intended for development management purposes. The Greater London Authority considered that this would be helpful so that councils can concentrate on locally specific issues which differentiate their areas from others. The National Planning Policy Framework (NPPF) and draft London Plan both emphasise that there is no need for Local Plans to repeat their policies. The Local Plan therefore follows this advice where it is considered national or London policy provides sufficient policy detail. The Brent Local Plan should be seen as complementary to be read in conjunction with the London Plan, NPPF, National Planning Practice Guidance and London Plan Supplementary Planning Guidance documents.</p> <p><u>The NPPF (paragraph 21) requires local planning authorities to make explicit which policies are strategic in their Local Plan. Accordingly, the Council has used the criteria provided in the NPPF to assess the policies and site allocations contained within the draft Brent Local Plan. The outcome of this assessment is set out in Table 1 of Appendix 6 of this Plan with the assessment, criteria and conclusions shown within Table 2 of the Appendix. Where a policy was considered to meet at least one of the NPPF criteria, it was determined to be a strategic policy.</u></p> <p>2.15 As a result, such the structure of the Brent Local Plan is such that it obviously complements the Good</p>	<p>Amend text to update position on London Plan adoption.</p> <p>Additional paragraph to clarify the Council's approach to making explicit the strategic and non-strategic policies within the Local Plan, as required by the Framework.</p>	No. Amendment for consistency only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Growth Policies and chapters of the London Plan. This is shown in Figure 4. The Plan has a brief overview of Brent’s characteristics, identifying some of the challenges and opportunities. This sets the scene for the following Spatial Vision for Brent, identifying locally specific examples of how the Good Growth Policies will be delivered in Brent either across the borough or through specific areas/ sites. In recognition of the fact that the borough is not homogenous but is made up of a series of smaller places, the Plan splits the borough up and focuses on 7 ‘Places’. The extent of these Places is loosely based on a scale that is likely to be more locally relevant taking account of a mixture of town centres that exert an influence within them, plus their character and clearly defined physical features which might effectively separate them from other identified Places.</p> <p>2.16 For each of these Places there is an overview of matters such as physical features that define its boundary, a high level analysis of its current attributes, such as town centres, culture and character, transport, employment and education. The challenges and opportunities of the Place are set out. This helps inform a vision for the Place and then the Policy for matters such as culture and character, transport, employment and education, and town centres. In addition, key Site Allocations are set out.</p> <p>2.17 The Plan then sets out a general position statement in relation to new development in the borough, before using the same chapter headings as the draft</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			London Plan to set out locally specific Brent policies on these matters.		
MM2	3 Brent Characteristics	3.17, page 20	<p><i>Amend sentence of para 3.17 to read:</i></p> <p><u>However, to support new residential development, current projections indicate a new primary school will be required in Wembley Park by 2023.</u> There are however projected shortages of space for secondary pupils which will require provision of the equivalent of two additional secondary schools by 2023/24.</p>	To ensure plan accurately reflects the planned provision.	No. Amendment for consistency only.
	3 Brent Characteristics	3.19, page 21	<p><i>Amend latter part of para 3.19 to read:</i></p> <p>In terms of indoor sports facilities, <u>the Council's Indoor Sports and Leisure Needs Assessment identified</u> provision is significantly below needs. Swimming pools are between ¼-½ of the provision per head of population in adjacent boroughs¹⁰. <u>There is also the need for additional sports halls. The Council's Playing Pitch assessment identified that for some sports, additional pitches are required.</u></p>	To ensure the plan accurately reflects the evidence base.	No. Amendment for consistency only.
	3 Brent Characteristics	3.32, page 25	<p><i>Amend last part of para 3.32 to read:</i></p> <p>It however is severely congested at peaks times. It has significant adverse impacts on communities in terms of severance, pollution and noise. Its <u>will be used</u> as the boundary of the extended Ultra-Low Emissions Zone (ULEZ) to be introduced in 2021 is unclear in terms potential changes on these adverse impacts. <u>Transport for</u></p>	To provide greater clarity on impacts of ULEZ on air quality.	No. Amendment for clarity only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<u>London predict that the ULEZ 2021 will reduce air pollution in Brent by NO2 by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular.</u>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM3	4 Development Vision and Good Growth in Brent	How Will Good Growth In Brent be Delivered?, page 28-29	<p><i>Amend to read:</i></p> <p>How will Good Growth in Brent Be Delivered?</p> <p><u>4.2 4.37</u> The London Plan includes six Good Growth Policies Objectives that set out the fundamentals on which development in London should deliver. In Brent highlights of how these will be addressed in relation to places <u>and subject chapters in supporting delivering the development vision and good growth</u> are:</p> <p>7. Strong & Inclusive Communities</p> <p>g) Reduce spatial inequalities within Brent and incidences of areas with high levels of multiple deprivation by promoting mixed and balanced communities particularly around Wembley, Stonebridge, Harlesden, Neasden and South Kilburn and on council housing estates</p>	<p>Correct numbering to allow better referencing.</p> <p>Relate to the Plan's vision, provide consistency with London Plan, reflect up-to-date housing trajectory, provide reference to Policy BH2/BD2 /BT1 /BG11 /BSU11, recognise the importance of indoor and outdoor sports</p>	Yes on new criteria and more significant changes which are considered likely to affect sustainability objective outcomes to existing criteria such as 4a, 4b, 4c, 5b and 6a.

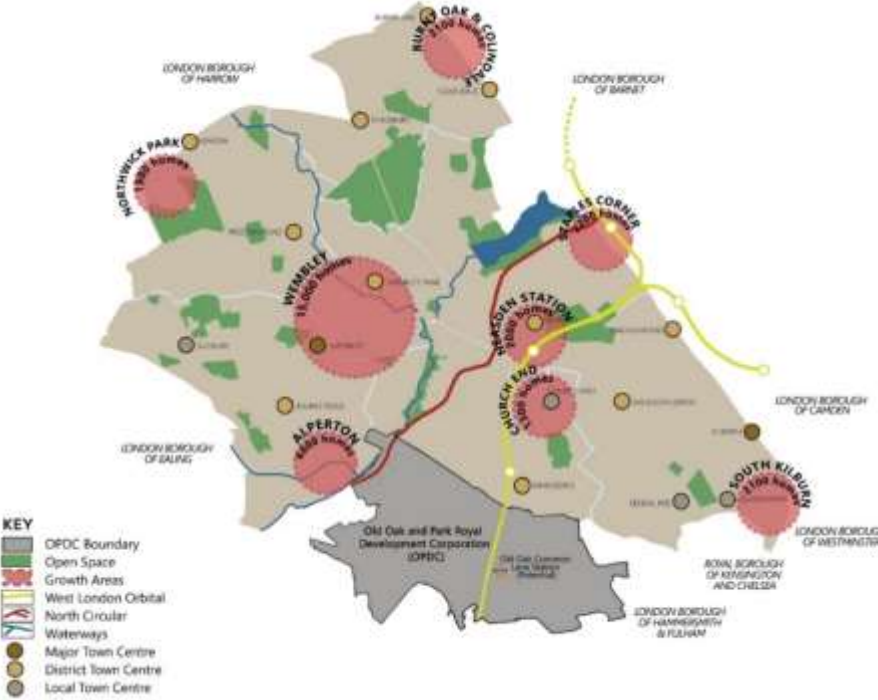
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>h) Building on Brent’s status as London Borough of Culture 2020 by supporting inclusive places, where ethnic diversity is celebrated and recognised, and places where cultural activities are already concentrated, e.g. Wembley, Cricklewood and Kilburn High Road</p> <p>i) Create a more equal and affordable borough, where the opportunities to access good quality housing, employment, education, digital connectivity and culture are maximised</p> <p>j) Strengthen the existing sense of community by celebrating Brent’s diversity, heritage and culture, and creating places where Brent’s community can meet</p> <p>e) <u>Ensuring the delivery of a wide range of essential social infrastructures in Growth Areas and across the Brent to support the delivery of sustainable communities</u></p> <p>8. Making the best use of land</p> <p>e) Prioritising <u>the majority of residential</u> development in new and more efficiently and intensively developed Growth Areas such including Northwick Park, Staples Corner and Neasden <u>Stations</u> and continuing to deliver in those that have already been started, such as in Alperton, Burnt Oak/ Colindale, Church End, South Kilburn and Wembley to enhance environmental quality, and bring benefits to the community;</p> <p>f) Supporting higher density development in Brent’s town centres, <u>Intensification Corridors</u> and in areas with good accessibility to public transport,</p>	<p>facilities and improving air quality, reflect industrial land evidence base, reflect retail and leisure needs evidence, reflect the need for affordable space.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>g) encouraging greater access, recreational use and also understanding of ecology in Brent's extensive areas of open spaces, such as the Welsh Harp and Fryent Country Park</p> <p>h) <u>Identifying appropriate areas for tall buildings and change that add quality to and complement Brent's character and sense of place</u></p> <p>9. Creating a Healthy Borough</p> <p>e) Using the iconic sporting heritage associated with Wembley Stadium to play its part in stimulating greater levels of activity.</p> <p>f) Integrating physical activity back into the everyday lives of residents through promoting safe environments, active travel and improving access to open spaces, sports and leisure facilities.</p> <p>g) Improving physical and mental well-being for borough residents by adopting a health-integrated planning approach</p> <p>h) Reducing health inequalities through focusing on narrowing the gap between the most affluent and the most deprived areas of the borough</p> <p>k) <u>Ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough</u></p> <p>l) <u>Improving Brent's air quality overall and particularly in Growth Areas</u></p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>10. Growing a Good Economy</u></p> <ul style="list-style-type: none"> g) <u>Make better use of Brent’s employment industrial land and overall increase its industrial floorspace through a structured approach to deliver industrial-its intensification and land release, where appropriate and also where possible support additional housing/ community facilities through co-location</u> h) <u>Support Brent’s priority high streets in adapting to the changing lifestyles, including the way people shop, lifestyles- and the challenges posed by other large centres in London, with, where appropriate, additional retail and leisure floorspace and supporting Wembley’s growth to metropolitan centre status</u> i) <u>Promote and support a strong and diverse night-time economy in Wembley, Cricklewood, Kilburn and Wembley Park to contribute to London’s role as a 24-hour city</u> j) <u>Delivering a minimum of 2,622 serviced accommodation rooms to support town centre economies, particularly those of Kilburn and Wembley</u> k) <u>Protecting existing viable office floorspace and identifying sites within Wembley to provide new high quality office floorspace.</u> l) <u>Continue to support Brent’s high level of entrepreneurship and small business formation by encouraging new creative industries and affordable workspace</u> <p><u>11. Increasing Efficiency and Resilience</u></p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>g) Reduce carbon emissions by supporting the continued expansion of local and renewable energy systems such as those at Wembley Park and South Kilburn <u>and</u> into other Growth Areas</p> <p>h) Tackle congestion and air quality around the North Circular, improving orbital public transport routes such as the West London Orbital railway scheme <u>and</u> <u>prioritising active travel</u> to provide realistic alternatives to travelling by car</p> <p>i) Reduce the risk of flooding from the River Brent and its tributaries and other sources by putting the right development in the right places and reducing surface water run-off and potable water use</p> <p>j) Provide a safe and inclusive environment around Wembley Stadium and Wembley Arena to support their iconic status for positive memories to be made</p> <p>k) Continue to support Brent’s award-winning street tree planting initiatives and greening of the built environment to combat air pollution, flooding, overheating and threats to ecological habitats</p> <p>l) <u>Enhancing the capacity of existing green and blue infrastructure such as Welsh Harp, the river Brent corridor and Grand Union Canal across a range of needs, including recreation, biodiversity and climate change</u></p> <p>12. Delivering the homes to meet Brent’s needs</p> <p>d) Housing delivery will be maximised, with sufficient planning permissions to support delivery of <u>more</u></p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>homes than the minimum London Plan housing target of 23,250 between 2019/20-2028/29. A minimum 46,018 dwellings will be delivered for the whole plan period of 2019/20-2040/41 on average 2040 homes a year in the period to 2041 to meet principally Brent's housing needs but also those of wider London;</u></p> <p>e) Providing new homes in truly mixed, inclusive communities across a range of tenures, maximising the provision of affordable homes with a particular emphasis on social rented properties, but also more affordable home ownership and improved opportunities for higher quality market rented properties;</p> <p>f) Providing new family housing with at least 25% of new homes being 3 bedrooms or more, recognising that Brent's suburban context provides opportunities for houses as well as flats;</p> <p>g) Meeting the growing need for specialist housing such as the 230 homes for older people per year to accommodate Brent's aging population and others with challenges who may require additional support.</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM4	FIGURE 6 Brent Key Diagram	Page 29	<p>Replace Figure 6:</p> 	For clarity, reflect up to date Growth Area housing target and accurate town centre hierarchy.	No. Map is just to provide visual reference.
MM5	DMP1	Page 30	<p>Amend part e) of policy to read:</p> <p>c) provided with the necessary physical and social infrastructure;</p> <p>d) conserving and where possible enhancing the significance of heritage assets and their settings;</p>	For clarity remove contradiction in the policy.	No, amendment for clarity only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>e) maintaining or and where possible enhancing sites of ecological importance;</p> <p>f) safe, secure and reduces the potential for crime;</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM6	5.1 Central Place	Challenges table, page 43	<p><i>Amend point to read:</i></p> <ul style="list-style-type: none"> No net loss and maximising employment industrial floorspace in new developments, where there is existing industrial use, is required due to Brent being recognised as a provide capacity borough. 	To ensure consistency with London Plan	No. Amendment for consistency only.
MM7	5.1 Central Place	Policy BP1, page 45	<p><i>Amend parts of policy to read:</i></p> <p>Character, Heritage and Design</p> <p>a) Tall buildings are appropriate within the Wembley masterplan area tall building zone, taking care to preserve protected views of the stadium and create a high quality new neighbourhood, integrating well with the suburban character of the surrounding area</p> <p>Homes</p> <p>d) Minimum of 13,700 additional homes in the period to 2041, which will be predominantly achieved through residential-led mixed-use development within the Wembley Growth Area will be supported which in total will deliver delivering a total of over 15,000 new homes, principally within the Wembley Park development</p>	To make consistent approach across the housing trajectory, retail and leisure floorspace evidence needs, Local Plan (Policy BD2/BE1),	Yes. Amendments to criterias G, H and K have potential implications upon SA scoring criteria.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>e) Intensification and higher residential densities will be supported around Wembley Park Station where it can be demonstrated development would take advantage of the area's good access to public transport</p> <p>Town Centres</p> <p>f) To ensure that the development around the national stadium is compatible and coordinated with regeneration proposals in the surrounding area, and that Wembley town centre, the main focus for new retail and town centre uses in the borough, is expanded</p> <p>g) Planning for the development by 2028¹ of 6,700 2,100 sqm comparison goods retail floorspace by 2028, and 6,100 4,300 sqm of convenience goods retail floorspace, in addition to that already existing and consented, directed towards Wembley and Wembley Park town centres to support their future designation as a single metropolitan centre at the London Plan level</p> <p>h) Providing at least one additional food store of between 1,000 and 2,000sqm</p> <p>i) Diversifying the town centre offer to include more cultural and leisure facilities</p> <p>Employment and Skills</p> <p>j) Encouraging the intensification of existing Strategic Industrial Locations closer to the North Circular Road</p> <p>k) Retaining Introducing a greater significant proportion of employment industrial floorspace in new mixed-use developments on Watkin Road and First Way to the east of the Stadium than previously allocated in the Wembley Area Action Plan</p>	London Plan policies.	

¹ Total combined floorspace to be delivered over the Central and South West Places. MM?

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			l) Increasing the supply of modern affordable workplace developments for the arts and creative industries <u>consistent with Policy BE1</u>		
	5.1 Central Place	5.1.19, page 46	While much of this area has a strong suburban character dominated by two storey detached and semi-detached homes built during the early 20th century, the building of the national stadium provided a context for the provision of a concentration of tall buildings. As a recognised transformational area, additional tall buildings are appropriate in the Wembley Growth Area. The taller elements within the area will be consistent with the parameters set out in the Wembley masterplan associated with the outline planning permission 15/5550 for the remainder of Wembley Park. Further guidance on the location and scale of tall buildings in other parts of the Growth Area is set out on the Policies map <u>and policy BD2</u> as supported by the Brent Tall Building Strategy.	For clarity regarding tall buildings policy	No. Amendment for clarity only.
	5.1 Central Place	5.1.25, page 47	<i>Amend last sentence of para 5.1.25 to read:</i> For the Wembley town centres, vitality and viability will be enhanced through 6,700 <u>2,100</u> sqm net comparison goods <u>retail</u> floorspace, and 6,100 <u>4,300</u> sqm convenience <u>retail</u> floorspace, diversifying the offer through specialist markets and meanwhile uses.	To set out retail and leisure floorspace needs as reflected in the strategic policy for the Place.	No. SA consideration addressed in main policy.
MM8	5.1 Central Place	Policy BCGA1, pg.50	<i>Amend last paragraph of policy to read</i> All developments will achieve the highest design standards. Energy efficient design and renewable energy are encouraged. Development will provide at least 15,000 new homes, supported by infrastructure identified within the Infrastructure Delivery Plan. Anticipated infrastructure will include: <ul style="list-style-type: none"> • Junction improvements 	To provide consistency with policy BGI1 and evidence base of Growth Area open	Yes. Identification of new open space may increase SA scores.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • New nursery and primary school at York House • Multi-use community centre • Open space provision: <ul style="list-style-type: none"> ▪ 1 x 2.8ha (7 acres) Local Park ▪ 4 x 0.2ha pocket parks ▪ Series of equipped play areas within new developments, improvement to existing open space, creation of informal recreation and good quality public realm ▪ Outdoor sports/ gym and MUGAs • New public open space (7-acre park plus other smaller spaces) incorporating play areas • Improvements to the quality and accessibility of existing adjacent open spaces • Planting new trees • New health facilities • Extension of Combined Heat and Power network 	space requirement	
	5.1 Central Place	5.1.40, page 50	<p><i>Amend para 5.1.40 to read:</i></p> <p>Wembley Growth Area is the <u>Wembley Opportunity Area</u>, as designated in the <u>London Plan</u>. Its designation as an <u>Opportunity Area</u> means that its growth is of <u>strategic importance to the whole of London</u>. It covers an extensive element of the Central place <u>and part of the South West Place</u> and certainly is the major contributor to the majority of the change that will occur <u>in this place</u>. The exception to this are the intensification corridors and land that retains its SIL designation. As these changes have essentially already been addressed in the justification for the Place, it is not proposed to unnecessarily repeat them again.</p>	To acknowledge the spatial designation in the London Plan and ensure the plan accurately reflects the extent of opportunity	No. Amendment for clarity only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
				area and impact.	
MM9	5.1 Central Place	BCSA1, page 52-53	<p><i>Amend parts of policy to read</i></p> <p>Timeframe for Delivery: 0-5 1-5 Years 20 5-10 6-10 Years 88 78 10+ 11+ Years 377 408</p> <p>Description of Existing Site: Site currently comprises a Kwik Fit, Public House and ASDA supermarket with associated carpark and four-pump petrol station. These are for the most part single storey buildings with large areas of car parking. The site is located approximately 200m northeast of Wembley Park Station and is bordered by the A4088 Forty Lane to the north, commercial properties to the south west and a retail parade and by residential development to the south and east. <u>It is immediately adjacent to the Barn Hill Conservation Area and the Grade II Listed Lycee International De Londres (former Brent Town Hall).</u></p> <p>PTAL Rating 4-5 (current), 5-6a (2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site forms part of Wembley Park Town Centre, <u>the Wembley Opportunity Area</u> and sits within the wider Wembley Growth Area, making it suitable for residential development. • The site is not within a Conservation Area or Archaeological Priority Area, however it is immediately adjacent to the Barn Hill Conservation Area and the Grade II Listed Lycee International De Londres (former Brent Town Hall). 	To increase brevity, make consistent approach across the Plan, reflect the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.	Yes. Reference to water infrastructure requirements.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • There are two vehicular access points to the ASDA site from the A4088 and Opportunities exist to create further access points via Wellspring Crescent. • The site is well served by public transport with tube and bus links located approximately 200m southwest of the site at Wembley Park Station, potentially allowing the site to be partly or wholly car free development. • Given the presence of filling station on ASDA site and current use on Kwik Fit site, there is a risk of contamination. Where development does come forward As such, a Preliminary Risk Assessment will be required and if necessary, remediation. • Given the identified need within the Brent's status as a provide capacity borough, the Council will seek no net loss of employment industrial floorspace and encourage to maximise its provision. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • There are a number of mature trees across the sites which should be retained where possible. • Small part of the site to the south falls under Flood zone 3a and is susceptible to surface water flooding. As the site is over one hectare a site specific Flood Risk Assessment will be required. • Developers should provide Development and its associated works should incorporate noise mitigation measures accompanied by a noise management plan to minimise where possible noise levels at source. Any works on site are to comply with the Control of Noise regulations. Any new development should have good sound insulation due to HGV's on site • A replacement of public house, pub or community facility D1 use class will be required. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Space for potential junction improvements at Forty Lane/Bridge Road may be required. <p>Design Principles</p> <ul style="list-style-type: none"> • To provide a vertically Mixed-use development incorporating ground floor retail/leisure/commercial uses that maximises the potential of the site. • An active frontage along Bridge Road, Forty Lane, Wellspring Crescent and Chalkhill Road. • Ideally the ASDA store entrance will be closer to Forty Lane and any servicing arrangements not Creating a break in the connection with the rest of the town centre. The potential for through smaller scale ground floor retail/commercial to create a positive frontage that adds to the retail offer and vitality and viability of the town centre should be considered if the supermarket cannot provide the active frontage. • To remove the obvious levels differences along the southern and south eastern boundaries for at least one building width by providing at street level building frontage. • Adjacent development of nine and seven storeys indicate the potential for taller buildings than the traditional suburban context that will need to take account of the setting of the opposite Grade 2 Listed former Town Hall, <u>Barn Hill conservation area</u> and not adversely impact on protected views of the stadium. • The relationship with space required for potential junction improvements need to be considered with a new development. • Retain or provide for sufficient space along the frontages to accommodate large broad leaf trees such as the London Planes that currently exist. <p>Infrastructure Requirements</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> • <u>Space for potential junction improvements at Forty Lane/Bridge Road may be required.</u> • Green and sustainable infrastructure should be part of the development process and the development. 		
MM10	5.1 Central Place	BCSA2, page 54-55	<p><i>Amend parts of policy to read</i></p> <p>Timeframe for Delivery: 0-5 1-5 Years 5-10 <u>6-10</u> Years 6-10 <u>966</u> 10+ 11+ Years 322</p> <p>Description of Existing Site The site is currently home to large retail units, a branch of McDonalds and the former Fountain Studios building, and is subject to planning application for a redevelopment known as Fulton Quarter. The site is just south of Wembley Park Station and is bordered by Olympic Way to the East, Wembley Park Drive to the west and Fulton Road to the south. The Wembley campus of the College of North West London sits immediately north of the site. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>PTAL Rating</p>	To increase brevity, make consistent approach across the Plan, reflect the housing trajectory, SFRA Level 2, Local Plan and London Plan policies and incorporate essential infrastructure needs.	Yes. Reference to new SFRA Level 2 and to water infrastructure requirements.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>5-6a (current and 2031 estimate) forecast</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site forms part of Wembley Park Town Centre, the Wembley Opportunity Area and sits within the wider Wembley Growth Area, making it suitable for all main town centre uses, plus residential/student accommodation. • Meanwhile uses will be encouraged on site on those parts that remain vacant until construction begins. • The existing retail, although out of town in format contributes towards capacity within a town centre. As such, given the limited opportunities to find new large-scale sites to accommodate identified retail needs, any development should seek to maximise re-provision of existing floorspace. The opportunity to accommodate convenience retail in particular needs to be considered. • The Fountain Studios is a cultural facility, which in the context of Wembley's identification in the London Plan as a Cultural Area of strategic importance, Brent's London Borough of Culture 2020 status and the desire to support the evening economy would ideally be replaced with another cultural facility. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • The principle of tall buildings is acceptable on this site, subject to their height not adversely affecting protected views of the stadium. • The frontage along Wembley Park Drive will require a reduction in scale to heights shown elsewhere by new development along Empire Way. • The site is in flood zones 2 and 3a and susceptible to surface water flooding. All proposed development will require a detailed Flood Risk Assessment (FRA). Development must be consistent with the 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u></p> <ul style="list-style-type: none"> The site proposal should take into account the College of North West London site allocation to the north which is also an allocation. Ideally The two sites It should be planned as such one, to that it increases the potentially efficiency of land use and optimum place making. At the very least development should not compromise the ability of that site to be developed in an efficient manner. <p>Risks No significant long-term risks identified, however leaseholders who operate on the site might be reluctant to end their occupation early. The site is owned by Quintain who are keen to develop to support the wider Wembley Park development.</p> <p>Design Principles</p> <ul style="list-style-type: none"> Building height and massing should build upon the established rhythm in this part of the Wembley Park development regeneration scheme. It should correspond to the neighbouring buildings and step down in scale towards the west of the site. Density should reflect the site's high PTAL. Active frontages should be provided at ground floor level, particularly along Wembley Park Drive, Olympic Way and Fulton Road. The site should retain an element of permeability to support pedestrian movement from Olympic Way to Wembley Park Drive. Due to the site's location in Flood Zone 3a, the 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, student accommodation, hotels, and certain community uses towards areas of lowest risk within the site; north west area and southern 		

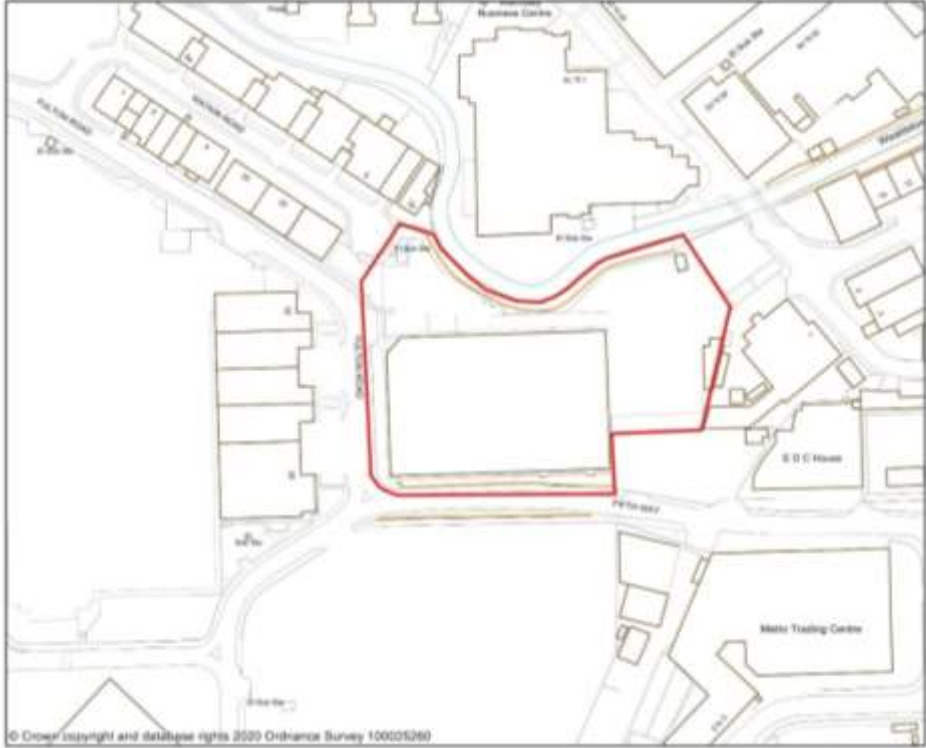
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>edge. Density should be varied to reduce the number of vulnerable units in high risk areas.</p> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Significant social infrastructure is being provided nearby as part of the wider Wembley development area Wembley masterplan, therefore no specific infrastructure apart from that usually required on large residential sites at this stage. • Associated infrastructure including water attenuation tanks, and the diversion of any utilities and services to accommodate the development. • Green and sustainable infrastructure should be part of the development process and the development. • <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> <p>Justification</p> <ul style="list-style-type: none"> • The site's <u>town centre location with excellent public transport access</u> offers substantial development potential as an integral part of the wider Wembley development area. • The Wembley masterplan <u>Given the viability and vitality of uses within this town centre location,</u> suggests that there are a number of mixed use options where creative office and other accommodation can be combined with educational and commercial accommodation at lower levels with residential development in upper storeys. • Proposals should maximise opportunities for development that would Benefit from a town centre location with excellent public transport access 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			and the close proximity to bus, rail and underground transport interchanges.		
MM11	5.1 Central Place	BCSA3, page 56-57	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 0-5 1-5 Years - 5-10 6-10 Years 80 10+ 11+ Years 370</p> <p>PTAL Rating 4-5 (current) 5-6a (2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> Part of the site is within the Wembley Park town centre (Premier Inn). The site is located within the Wembley Opportunity Area. It all sits within and the wider Wembley Growth Area. The Premier Inn site has the potential to accommodate a larger hotel or a hotel and range of other main town centre uses or residential. The remainder of the site along Brook Avenue can accommodate much higher density residential. The site is not within a Conservation Area or Archaeological Priority Area. The site is accessed via Brook Avenue by both vehicles and pedestrians and is well served by public transport, with good tube and bus links close to the site on Bridge Road. as such car free development is likely to be acceptable in this location. The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. 	To increase brevity, make consistent approach across the Plan, reflect the housing trajectory, SFRA Level 2, Local Plan and London Plan policies and incorporate essential infrastructure needs.	Yes. Includes reference to new SFRA Level 2

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Some of the existing dwellings in Brook Avenue are within functional floodplain zone 3a and 3b (surface water and fluvial and tidal) and are at risk of flooding. The redevelopment of these dwellings provides the opportunity to reduce the real risk of flooding to property by bringing development closer to Brook Avenue away from the watercourse. As the site is over one hectare all development will be required to undertake a detailed Flood Risk Assessment (FRA). <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • South of the site is the SINC Grade II Wealdstone brook. The site is recognised as a waterside development, developments adjacent and will be required to contribute towards restoration and naturalisation of the Brook, improve access to the waterway, provide appropriate landscaped setback, enhance water quality and biodiversity. Development should seek to incorporate the potential for fish easement weir behind Elliot Close as part of the potential naturalisation/channel enhancement works. • There are a number of mature trees spread across the site. Where possible these should be maintained and integrated into newly provided open space. • The site is adjacent to a wildlife corridor, where the London Plan Policy 7.19 G6 is applicable. The developers need to take into consideration a positive contribution to the biodiversity, improve access to nature and its recreational function that are important contributing factors to health and well-being of the community. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Design Principles</p> <ul style="list-style-type: none"> • The Premier Inn site provides the opportunity to provide a more defined edge to Wembley Park Drive/Brook Avenue and introduce an active frontage containing main town centre uses. • The site is adjacent to a mixture of residential and commercial buildings up to ten storeys. Within this context, development that is taller than the existing two storey suburban dwellings will be acceptable to the eastern side of the site, stepping down towards the residential buildings to the west of the site which is identified as an intensification corridor along Forty Avenue. • A minimum of 8m setback from Wealdstone Brook will be sought. Development will be required to positively contribute to the biodiversity, improve access to the waterway and provide an appropriate landscaped setback which may include public open space. • The building line should be closer towards Brook Avenue. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Green and sustainable infrastructure should be part of the development process and the development. • Brook Avenue/Bridge Road junction improvements are scheduled to be delivered in 2021, at this stage it is not anticipated any further improvements will be sought in relation to this allocation. • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Justification</p> <ul style="list-style-type: none"> • The site is located in an area with Excellent public transport accessibility levels and • Potential to could improve the public realm as a gateway to the new Wembley Park development. • Given the high levels of development around this site, it would benefit from good access to local shops and services. • Redevelopment of this site can contribute towards an improved setting for the Wealdstone Brook, including the delivery of open space and river restoration work to improve ecological diversity and climate change adaptation. 		
MM12	5.1 Central Place	BCSA4, page 58-59	<i>Replace Site Plan</i>	To remove the waste site, increase brevity, make consistent approach across the Plan, reflect the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.	Yes. Site boundary changed with implications upon site capacity, and amended approach to re-provision of employment/ industrial land.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			 <p data-bbox="719 1043 1106 1078"><i>Amend parts of policy to read:</i></p> <p data-bbox="719 1123 1776 1235">Existing Use Retail Warehouse and car park of Euro Car Parts and adjacent vehicle/skip site for Generay</p> <p data-bbox="719 1279 902 1311">Allocated Use</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Mixed-use, residential-led development to maximising re-provision of industrial floorspace incorporate maximum of business use floorspace, hotel and potentially student accommodation</p> <p>Indicative Capacity Up to 700 dwellings (residential and student accommodation). Employment space and hotel space to be confirmed. 450 dwellings and industrial space to be confirmed</p> <p>Timeframe for Delivery 0-5 1-5 Years 200 450 5-10 6-10 Years 500 10+ 11+ Years -</p> <p>Area 1.3ha 1.14 ha</p> <p>Description of Existing Site The site is currently in commercial and industrial use with approximately half the site occupied by large sheds and the remainder comprising associated car parking and storage. Wealdstone Brook forms the northern border of the site, with new housing development coming forward to the south and west. Directly east of the site it becomes industrial in nature characterised by small scale low-rise sheds along Fourth Way.</p> <p>PTAL Rating 3 (current) 3-4 (2031 estimate)</p> <p>Planning Considerations</p>		


Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>The site is located within the Wembley Opportunity Area and Wembley Growth Area.</u> • The site was allocated within the Wembley Area Action Plan for mixed-use development with capacity for 360 dwellings. • The approval of the Wembley Park masterplan and subsequent increases in height and therefore density within that context means that a larger amount of development is now considered appropriate on the site. The site is appropriate for tall buildings, subject to them achieving an appropriate relationship sensitive to its surroundings and not adversely affecting protected views of the stadium. • The site is located within an Air Quality Management Area. <u>As such, development at this site should be air quality positive as it is within the Growth Area.</u> development at this site should achieve to reduce pollutant emissions and minimise exposure. • Given <u>the identified need within the</u> Brent's status as a provide capacity borough, the council will seek <u>the maximum viable re-provision of</u> no net loss of employment <u>industrial</u> floorspace and if a plot ratio of 0.65 is greater, encourage the maximisation of its provision suitable for and B1 (c), B8 and B2 use as a part of any redevelopment of this site. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required and, if necessary, remediation. • North of the site is the SINC Grade II Wealdstone brook. The site is recognised as a waterside development, <u>as such,</u> developers will be required to contribute towards restoration and naturalisation of the Brook, improve access to the waterway, provide appropriate landscaped setback, enhance water quality and biodiversity. • Small sections of the site is susceptible to surface water flooding. The site is also adjacent to flood zone 3a (fluvial and tidal) so an appropriate 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>buffer zone along the brook will remove the developable area of the site of any major risks.</p> <ul style="list-style-type: none"> • <u>A critical trunk sewer runs through this site which would need to be considered.</u> • Waste water facilities enhancement. Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. <p>Risks None Existing employment use of the site means that the policy context has changed from when the site was allocated in the Wembley Area Action Plan. As such re-provision of employment space could impact on previously assumed capacity for other uses and development economics.</p> <p>Design Principles</p> <ul style="list-style-type: none"> • The creation of an appropriate buffer between the existing industrial and new non-industrial uses will be required. • Given the permitted neighbouring heights permitted as part of the Quintain masterplan, tall buildings will be appropriate, stepping down towards the eastern edge of the site and not adversely affecting protected views of the stadium. • Active frontage along Fifth Way and Fulton Road. • Biodiversity improvements and flood risk adaptation measures will be sought when development proposals come forward. • A buffer strip of at least 10m wide should be retained for a publicly accessible brook side park to allow for a cycle way/footpath, associated 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>landscaping, tree planting and street furniture as agreed in consultation with the Environment Agency and Brent Council.</p> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • <u>Developers would be required to contribute towards restoration and naturalisation of the SINC Grade II Wealdstone brook.</u> • Further master planning work will provide additional requirements. • Green and sustainable infrastructure should be part of the development process and the development. • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> 		
MM13	5.1 Central Place	BCSA5, page 60-61	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use Mixed use main town centre uses, education/campus or residential incorporating flexible retail uses, <u>leisure and community uses</u> (A1, A2, A3, A4, D1, D2)-at ground floor level</p> <p>Indicative Capacity 253 residential units plus 1,051sqm of flexible retail uses/ if the site comes forward for residential as set out in the planning permission – currently it is</p>	To increase brevity, make consistent approach across the Plan, reflect the housing trajectory, Local Plan (Policy BT2),	Yes. Reference to water infrastructure requirements

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>anticipated that it will now be where the or College Of North West London campus is the assumed occupier currently so no residential dwellings have been assumed for anticipated in the housing delivery trajectory on this site.</p> <p>Timeframe for Delivery 0-5 1-5 Years 5-10 6-10 Years 10+ 11+ Years</p> <p>Address Olympic Office Centre, 8 Fulton Road, Wembley, HA9 0NU</p> <p>PTAL Rating 5 (current), 5-6a (2031-estimate) forecast</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site falls within Wembley town centre boundary, the Wembley Opportunity Area and forms part of the wider Wembley Growth Area. • The site is suitable for a tall building subject to this not adversely impacting on protected key views of the National Stadium. and does not fall within a Conservation Area or Archaeological Priority Area. • A small part of the site falls under Floodzone 3a and is susceptible to surface water flooding. • Although it has planning permission for principally a residential development, Its town centre location makes it suitable for office-led mixed-use development Its town centre location makes it appropriate for a range of town centre uses as well as for any potential CNWL/further/higher education campus. 	London Plan policies, national policies and incorporate essential infrastructure needs.	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Excellent Public Transport Accessibility Levels are very high for this site, and so parking spaces should be minimal <u>so car free development should be prioritised.</u> • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Public realm improvements associated with removal of vehicle crossings/new access points. • Green and sustainable infrastructure should be part of the development process and the development. • <u>A critical trunk sewer runs through this site which would need to be considered.</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Risk of damage to the trunk sewer during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> 		
MM14	5.1 Central Place	BCSA6, page 62-63	<i>Replace Site Plan</i>	Remove part of the site delivered on site.	Yes. Amendment to site boundary, with implications


Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			 <p data-bbox="719 1043 1106 1078"><i>Amend parts of policy to read:</i></p> <p data-bbox="719 1123 1760 1350">Allocated Use Mixed-use, residential-led development <u>incorporating maximum re-provision of industrial space</u> to the west of the site, adjacent to other schemes coming forward as part of the Wembley Park masterplan transitioning to a more commercial-led use towards the east of the site bordering Wembley Business Centre industrial estate.</p>	<p data-bbox="1800 225 1984 959">To increase brevity, make consistent approach across the Plan, reflect the housing trajectory, SFRA Level 2, Local Plan (Policy BE3), London Plan policies, national policies and incorporate essential infrastructure needs.</p>	<p data-bbox="2024 225 2192 727">upon site capacity and includes reference to new SFRA Level 2. Industrial floorspace minimum deliverable has also changed.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Indicative Capacity Assumed 1000 dwellings on basis of density of existing permissions prior to more detailed assessment, 717 plus employment industrial floorspace at ground floor</p> <p>Timeframe for Delivery 0-5 1-5 Years 500 229 5-10 6-10 Years 350 10+ 11+ Years 150 138</p> <p>Planning History 17/2782 – approved application for the demolition of Parkwood House to provide 113sqm affordable workspace plus 283 bedroom student accommodation within a part 13 and part 17 storey building. Under construction. Part of the site:18/3381 approved application and under construction - Demolition of existing buildings and redevelopment of the site to provide 219 residential units and 584.6sqm of affordable workspace (Use Class B1(a)) on ground floor, in a new building ranging between 2 and 23 storeys together with associated infrastructure works including private and communal space, car parking, cycle storage and public realm improvements.</p> <p>PTAL Rating 4 (current and 2031 estimate) 2031 forecast –PTAL</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is located within the Wembley Opportunity Area and The site falls under Wembley Growth Area. • The approval of the Wembley Park masterplan and subsequent increases in height and therefore density within that context means that a larger amount of development is now considered acceptable on the site than was identified in the Wembley Area Action Plan. The site is appropriate for 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>tall buildings, subject to them being lower than the adjacent approved Wembley masterplan parameters <u>of sites to the south, and</u> not adversely affecting protected views of the stadium or the residential amenity of the occupiers of North End Road.</p> <ul style="list-style-type: none"> • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required and, if necessary, remediation. • The site falls within Flood Zones 3a (Surface, Fluvial and tidal). A Flood Risk Assessment will be required as part of any development coming forward. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • Wealdstone Brook runs along the northern boundary of the site and is designated as a Grade II Site of Interest for Nature Conservation (SINC) of Borough Importance. • Although the loss of existing employment industrial land was considered appropriate in the WAAP, Brent's London Plan 'provide capacity' status for employment. <u>Given the identified industrial land need within the borough,</u> means that employment <u>the maximum viable replacement industrial</u> floorspace at least on the ground floor of 0.65 plot ratio or existing floorspace whichever is the greater will now be sought <u>in developments</u> as part of the redevelopment of the site. • Development in proximity to the north-eastern part of the site (<u>adjacent to Wembley Business Park</u>) must adopt the 'agent of change principle', potentially through incorporation of more commercial uses to ensure the potential activities within the Wembley Business Centre is not compromised. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. <p>Design Principles</p> <ul style="list-style-type: none"> • Tall buildings will be acceptable taking into account need to mediate between heights of the adjacent Wembley masterplan development sites plus Parkwood House, Apex House and Amex House and Empire Court. • Proposed development must ensure it does not adversely affect the ability of other plots within the allocation to maximise their own development potential. Particular attention must be paid to the relationship between developments on the north and south sides of Watkin Road. • Active frontages along Fulton and Watkin Road at ground floor level will be sought. • Where possible existing trees should be maintained and new trees should be planted within the new development. • Flood mitigation should not compromise a high quality deliverance of public realm and interface between street and ground floor use. • Development should bring forward an improved setting for Wealdstone Brook including the delivery of open space, potential for increased access and river restoration work to improve ecological diversity and climate change adaptation. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Green and sustainable infrastructure should be part of the development process and the development. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> A vehicular link on the eastern end of the site between Fulton Road and Watkin Road might be required to improve the efficiency of access for service vehicles. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> <p>Justification</p> <ul style="list-style-type: none"> The site is located in an area with Good public transport accessibility levels and Potential to could improve the public realm as a transition from the new Wembley Park development to the industrial land located east of Wealdstone Brook. Given the high levels of development around this site, it would benefit from good access to local shops and services. 		
MM15	5.1 Central Place	BCSA7, page 64-65	<i>Replace Site Plan</i>	<p>Site divided into two site allocations and related text moved to new BCSA20.</p> <p>To increase brevity, make clear the future</p>	Yes. Increase in site capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			 <p><i>Amend parts of policy to read:</i></p> <p>Policy name BCSA7: WEMBLEY PARK STATION (NORTH & SOUTH)</p> <p>Existing Use Car parking and office facilities for Wembley Park Station and disused railway sidings</p>	<p>need for potential rail line expansion, make consistent approach across the Plan, reflect housing trajectory, Local Plan (Policy BE3), London Plan and national policies and incorporate essential infrastructure needs.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Allocated Use Mixed-use residential-led development to include replacement of the existing office space TfL ancillary accommodation</p> <p>Indicative Capacity 456 400 dwellings (300 southern site, 100 northern)</p> <p>Timeframe for Delivery 0-5 1-5 Years 150 5-10 6-10 Years 250 456 10+ 11+ Years -</p> <p>Description of Existing Site The two sites lies to the north and south of the rail line running through Wembley Park Station. The northern site comprises rail sidings associated with Wembley Park Station. The main road access to the site comes from Forty Avenue. To the north there is a nursing home and opposite the site on the other side of Forty Avenue is the Sattavis Patidar Centre. The southern site runs along the south side of the train tracks at Wembley Park Station and currently comprises TfL offices and car parking. Brook Avenue runs along the southern boundary of this site and provides two vehicular access points to the existing car park. The site is bounded by residential development to the south and west. To the south of Brook Avenue there is a mixture of residential blocks up to 10 storeys, two storey detached and semi-detached houses and a Premier Inn, while to the west there is a development of four residential blocks ranging from 5 to 8 storeys.</p> <p>PTAL Rating 5-6a (current and 2031 estimate)</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is adjacent to the boundary of Wembley Park Town Centre. The site is located within the Wembley Opportunity Area and sits within the wider Wembley Growth Area, making it suitable for residential or mixed-use development. • The site contains no designated heritage assets however Development must ensure that it does not impact on the protected view of Wembley Stadium from Barn Hill Open Space. • Access to the northern parcel of land is constrained and so development will likely be of a lower density than that on the southern parcel. • There is a row of mature trees along the site boundary on Brook Avenue which ideally should be retained. • The site to the south is adjacent to a wildlife corridor, where the London Plan Policy 7.19 is applicable. The developers need to take into consideration a positive contribution to the existing ecology, biodiversity, improve access to nature and its recreational function that are important contributing factors to health and well-being of the community. • Future development will mitigate potential noise and vibration from the nearby train tracks. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. • Sufficient replacement on-site parking should be provided on site to meet any of the operational needs required by the station and not cause 		

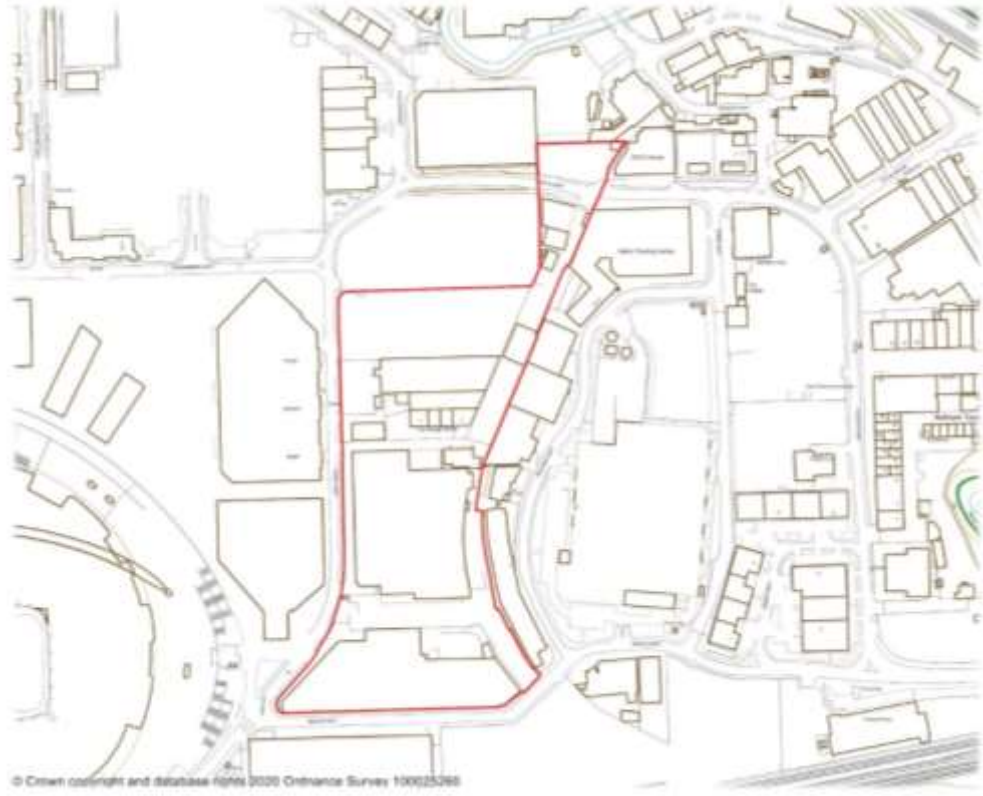
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>unacceptable impacts on the surrounding residential areas through displacement of user parking.</p> <p>Risks Site is considered available and developable; no significant risks identified.</p> <p>Design Principles</p> <ul style="list-style-type: none"> • The northern part has better ecology now than what existed when it was in full time use, thus consistent with its identification as a wildlife corridor is required to address existing ecology through good design. The northern parcel of land will be developed at a lower density than that currently opposite to the south of the railway on Matthews Close. Building height should take reference from the surrounding three and four storey residential and commercial uses. Buildings may step up to four or five storeys however the northern site is not suitable for tall buildings of a significant scale. • The southern site is adjacent to a mixture of residential and commercial buildings. Up to ten storeys will be considered acceptable to the western side of the site stepping up slightly directly adjacent to the station (all subject to impact on protected views of the stadium). • A contemporary design will be supported, and Links should be established between this site and others coming forward as part of the wider Wembley Park development regeneration scheme to ensure this development is successfully integrated integration with the surrounding schemes coming forward over the Local Plan period. • Active frontages will be provided along Brook Avenue with substantial soft landscaping to create defensible space for residents. • Sufficient set back from the railway lines will be required to assist in mitigating against potential adverse impacts of train movements/engineering works. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Green/blue and sustainable infrastructure should be part of the development process and the development. • <u>The development should not compromise the ability to add potential platforms at Wembley Park station on the Chiltern Line Aylesbury Branch.</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> <p>Justification</p> <ul style="list-style-type: none"> • <u>Consistent with</u> London Plan Policy H1 <u>the site is a</u> states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, in particular through the redevelopment of sites around transport hub and mixed-use redevelopment of car parks. • Other recent developments along Brook Avenue suggest that the site can be intensified to provide a mixed-use scheme which co-locates TfL's commercial space with a significant number of new dwellings. • The site has excellent access to public transport and local infrastructure including shops and green spaces. • The council needs to ensure continued provision of employment space so will seek its retention on this site. 		
MM16	5.1 Central Place	BCSA8, page 66-67	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity</p>	To increase brevity, make consistent	Yes. Increase in

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>2180 2260</p> <p>Timeframe for Delivery NE01/02, NE03, NE04/05/06 0-5 1-5 Years 468 5-10 6-10 Years 17122260 10+ 11+ Years</p> <p>Description of Existing Site The site forms the North Eastern Lands section of the Wembley masterplan and is currently occupied by a small number of industrial warehouse units to the east and temporary office facilities and playing pitches. The majority of the site is currently covered by car parking associated with Wembley Stadium. The site boundaries are formed by Engineers Way, Fulton Road and Rutherford Way, with plots of land adjacent to this site also under construction or planned to come forward for development either as part of the Wembley masterplan or as standalone schemes.</p> <p>Planning History Forms plots NE01-06 as well as the northern section of the new park planned for the area part of application 15/5550, a hybrid planning application for the redevelopment of land around Wembley Stadium.</p> <p>PTAL Rating 3-5 (current and 2031 estimate)</p> <p>Planning Considerations</p>	<p>approach across the Plan, reflect housing trajectory, Local Plan (Policy BE3), London Plan, and incorporate essential infrastructure needs. Also reflects Secretary of State's London Plan modification directions.</p>	<p>site capacity. Industrial floorspace replacement amount also amended.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • The site is made up of plots NE01-06 of the approved Wembley masterplan as well as the northern section of the new park planned for the area. • The site falls just outside Wembley Town Centre boundary however it does sit within the Wembley Opportunity Area and wider Wembley Growth Area, making it suitable for residential led mixed-use development. • The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Given Brent's status as a provide capacity borough, the identified need within the borough, should the parameters of the existing outline need to be reviewed or a full application received the council will seek to ensure no net loss of the remaining employment maximum industrial floorspace and encourage maximisation of additional reprovision. • The site falls within the Tall Building Zone was identified as such it is suitable for tall buildings in the Wembley Area Action Plan and will be home to the tallest building in the proposed development, signalling the northern entrance into the park. • Small part of the site to the south falls under Floodzone 3a and is susceptible to surface water flooding. As the site is over one hectare a site specific flood risk assessment will be required. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Design Principles</p> <ul style="list-style-type: none"> Scheme should be designed in line with principles set out in planning application 15/5550. <u>Building height and massing should respond to surrounding development coming forward as part of the Wembley Park redevelopment. The massing set out as such to protect the views of the stadium. The ground floor should provide an active frontage on Rutherford Way/Fulton Road and Engineers Way.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Significant infrastructure is being provided throughout the masterplan area. This site should provide the northern section of the planned new 7-acre park Green and sustainable infrastructure should be part of the development process and the development. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> 		
MM17	5.1 Central Place	BCSA9, page 68-69	<i>Replace Site Plan</i>	Site boundary changed to add the waste site from BCSA4 to the North.	Yes. Change to site boundary and increase in site capacity

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			 <p data-bbox="734 1037 1198 1061">© Crown copyright and database right 2020 Ordnance Survey 100025265</p> <p data-bbox="719 1125 1108 1157"><i>Amend parts of policy to read:</i></p> <p data-bbox="719 1204 1713 1316">Allocated Use Residential-led mixed-use development, including student accommodation/ education and business industrial.</p> <p data-bbox="719 1364 974 1396">Indicative Capacity</p>	<p data-bbox="1803 263 2004 1117">To increase brevity, make consistent approach across the Plan, reflect housing trajectory, Local Plan (Policy BE3), London Plan, and incorporate essential infrastructure needs. Also, incorporate Secretary of State's London Plan modification directions.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>1312 1200-dwellings</p> <p>Timeframe for Delivery 0-5 1-5 Years <u>419</u> 5-10 6-10 Years <u>500</u> 10+ 11+ Years <u>393</u></p> <p>Area 4.42ha- 4.58ha</p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> • The site currently Comprises low-rise industrial units although there is an emerging taller, residential and commercial character with the UCFB campus building approved for the old Canon industrial units and the under construction Kelaty House adjacent to the north. • The site is Bounded by First Way to the west and Second Way to the east. • The site was previously allocated for development in the Wembley Area Action Plan, and has come forward in part for mixed-use residential-led schemes. <p>PTAL Rating 1a-3 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site falls outside Wembley Town Centre boundary however it does Sits within the Wembley Opportunity Area and the wider Wembley Growth Area, making it suitable for residential led mixed-use development. • The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • The site was identified as sensitive to tall buildings in the Wembley Area Action Plan and <u>The site falls within the Tall Building Zone as such it is suitable for tall buildings although</u> it should come forward at lower heights than those buildings further west towards the stadium. • New development should demonstrate that if providing non-residential use then the delivery of the equivalent of 1200 dwellings will be accommodated within the site. • The site has a low PTAL although it stands to benefit from better connections to the high levels of surrounding development and is within close walking distance to two rail stations. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Some land within the site will be required for highway improvement measures to South Way/First Way. This is part of the Wembley transport improvements around Wembley Industrial Estate and the two-way working. • Prior to its Wembley Area Action Plan allocation, the site was formerly Strategic Industrial Land It still Contains numerous occupied business industrial premises. Notwithstanding the acceptability of residential on site, <u>Given the identified need within the borough,</u> Brent's status as a 'provide capacity' borough in the London Plan means that <u>the</u> maximum re-provision of business <u>industrial</u> uses at ground floor level should be undertaken as part of development. • <u>Includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u> • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p> <p>Design Principles</p> <ul style="list-style-type: none"> • Development on this site should provide master planning showing <u>a</u> transition of heights and mediate between the taller schemes coming forward immediately east of the stadium and the Strategic Industrial Land that makes up Wembley Stadium Industrial Estate. • As its adjacent to what will remain as industrial sites, Development should adopt the ‘agent of change principle’ and not undermine industrial premises operation. produce a Noise Management Plan and take into consideration noise mitigation in design. • Developments within this allocation must ensure they provide Provision of high quality public realm and strong east-west pedestrian and cycling connections through the site to link routes delivered adjacent to the stadium to future development to the east between First Way and Second Way to the. This should be consistent with the pedestrian routes provided the development coming forward through Wembley Masterplan 15/5550 development, north and south of the Dhamecha. • Developments must take care to ensure they do not compromise the ability of other sites within this allocation to make the most efficient use of land possible at a later date. • They will also need to provide a successful transitional area between them and the adjacent industrial uses on Second Way. • Where business industrial premises are being provided on-site, the design should support the amenity of both residential and business industrial uses to ensure their long term compatibility. • Development should provide active frontages along First Way and South Way and the planned pedestrian routes north and south of Dhamecha. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> The proximity to the national stadium and coach/car parking means acceptable noise mitigation measures will be required to address event day activity. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Small parcels of land at the north and south of the allocation along Fifth Way and South Way may will be required for future road improvements. High quality public realm link from west to east between First Way and the site's eastern boundary to provide for future connections through to Second Way. Green and sustainable infrastructure should be part of the development process and the development. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> <p>Justification</p> <ul style="list-style-type: none"> The site is located at the edge of the current approved masterplan for the land around wider Wembley development adjacent to the Stadium and provides a key opportunity to mediate between the tall residential blocks to the west and the low-rise industrial units which make up Wembley Stadium Industrial Estate. The impermeable nature of this site currently does not provide good east-west links to the stadium. There is an opportunity to strengthen these links by creating new streets and pedestrian paths between First Way and Second Way. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> Whilst previously allocated for non-industrial uses, given Brent's provide capacity status, consideration needs to be given to potentially accommodate business premises in the redevelopment of sites that takes place. 		
MM18	5.1 Central Place	BCSA10, page 70-71	<p><i>Amend parts of policy to read:</i></p> <p>Existing Use Commercial office space and associated Car parking</p> <p>Allocated Use Nursery and 3FE primary school</p> <p>Timeframe for Delivery 0-5 1-5 Years 5-10 6-10 Years 10+ 11+ Years</p> <p>Description of Existing Site The majority of the site is comprised of car parking formerly associated with York House. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>Planning History</p>	To increase brevity, refer to recent planning application, make consistent approach across the Plan, reflect housing trajectory, Local Plan, London Plan, and incorporate essential infrastructure needs.	Yes. Included nursery in allocated use.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Site forms part of application 15/5550 for the redevelopment of land around Wembley Stadium. This plot is shown as YH1. 18/0204 granted permission for a 3 form primary school with 60 place nursery.</p> <p>PTAL Rating 5-6a (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site falls outside sits inside Wembley Town Centre boundary, however it sits within the Wembley Growth Area and Wembley Regeneration. Wembley Opportunity Area. • A primary school is required as part of the Wembley Park development. This site is the preferred location and has full planning permission. It is anticipated that the school will be required once sufficient occupation of Wembley Park creates the need for additional school place capacity. If the site is not required for the school, then alternative suitable provision will be required elsewhere within the Wembley Growth Area before this site is considered appropriate for alternative uses. Should this be the case, the site's location within the town centre boundary would make it suitable for a range of town centre uses, community uses and residential development. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Infrastructure Requirements</p> <ul style="list-style-type: none"> The Wembley transport improvements for York House Gyratory will be delivered in conjunction with the developer of the school. Green and sustainable infrastructure should be part of the development process and the development. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> 		
MM19	5.1 Central Place	BCSA11, page 72-73	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 0-5 1-5 Years - 5-10 6-10 Years 155 10+ 11+ Years -</p> <p>PTAL Rating 6a (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site falls outside inside Wembley Park Town Centre boundary, however it sits within the Wembley Growth Area and Wembley Regeneration. Wembley Opportunity Area Most of the site falls almost entirely within Flood Zones 2 and 3. A Flood Risk Assessment will be required as part of any development coming 	To increase brevity, make consistent approach across the Plan, reflect housing trajectory, SFRA Level 2, Local Plan, London Plan, and national policies, incorporate essential infrastructure needs.	Yes. Includes reference to new SFRA Level 2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>forward. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u></p> <ul style="list-style-type: none"> Waterside development must ensure it is in accordance with Local Plan policy BGI1 Green and Blue Infrastructure in Brent. The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. The area site is identified as acceptable for tall buildings, although development has to take account of its location on the edge the Wembley Park masterplan site and the suburban context around Wembley Park Drive and protected views of the stadium. <u>The loss of the site to non-D1 educational uses is on the basis that that the use is being re-provided elsewhere within the borough.</u> <p>Design Principles</p> <ul style="list-style-type: none"> This is a gateway site in that it is one of the main sites viewed when coming out of the Wembley Park station. Building height and massing should build upon the established rhythm in this part of the Wembley Park development regeneration scheme, corresponding to the neighbouring buildings and stepping down towards the west of the site. The design should be sensitive to the protected views of the stadium. Density should reflect the site's high PTAL. Active frontages should be provided at ground floor level, particularly along Wembley Park Drive and Olympic Way. There are a number of mature trees within the site adjacent to the Wealdstone Brook. Where possible these should be maintained and integrated into newly provided open space. <p>Infrastructure Requirements</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Significant social infrastructure is being delivered nearby as part of the Quintain masterplan. • Green and sustainable infrastructure should be part of the development process and the development. • The loss of the site to non-D1 educational uses is on the basis that that the use is being re-provided elsewhere within the borough. • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> 		
MM20	5.1 Central Place	BCSA12, page 74-75	<p><i>Amend parts of policy to read:</i></p> <p>Existing Use Industrial/Đ2 night club /Concrete batching plant</p> <p>Allocated Use Residential-led mixed-use development including business-industrial premises.</p> <p>Timeframe for Delivery 0-5 1-5 Years - 5-10 6-10 Years - 10+ 11+ Years 500</p> <p>Description of Existing Site</p>	Incorporate Secretary of State's London Plan modification directions, reflects potential need for highways capacity improvements, increase brevity, make consistent approach across the Plan, reflect	Yes. Amendments to approach on delivery of industrial floorspace.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>The site currently comprises a mixture low-rise industrial units (one in use as a night club) and a concrete batching plant. It is bound on the northern edge by South Way, to the south is the Chiltern line. To the west is the national stadium, to the north are industrial premises allocated for residential led mixed use development through Policy BCSA9. To the east a multi-storey car and coach park is being constructed for use in association with the national stadium/event days. The site was previously allocated for development in the Wembley Area Action Plan, and part has come forward for the car park under construction. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>PTAL Rating 2 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site falls outside Wembley Town Centre boundary however it does sit within the wider Wembley Growth Area and the Wembley Opportunity Area, making it suitable for residential led mixed-use development. • The SINC Grade I Chiltern line passes south of the site. The site is also adjacent to a wildlife corridor, where the London Plan Policy G6 Biodiversity and access to nature is applicable. As such, the developers need to take into consideration a positive contribution to the biodiversity, improve access to nature and its recreational function that are important contributing factors to health and well-being of the community. • The site falls within the Tall Building Zone however development was identified as sensitive to tall buildings in the Wembley Area Action Plan and so should come forward at heights consistent with buildings being constructed further west along South Way on sites SW03/04/05 that step down towards the south and from the east to west of the site. 	<p>housing trajectory, Local Plan (Policy BE3), London Plan policies, incorporate essential infrastructure needs.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>Tall buildings are acceptable on this site, subject to their height not adversely affecting the protected views of the stadium</u> • The site has a low PTAL although stands to benefit from better connections to the high levels of surrounding development and is within close walking distance to two rail stations. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Prior to its Wembley Area Action Plan allocation, The site was formerly Strategic Industrial Land. It still and contains numerous occupied business industrial premises. Notwithstanding the acceptability of residential on site consistent with the previous WAAP allocation, Brent's status as a 'provide capacity' borough in the London Plan means that no net loss of employment Given the identified industrial floor space need in the borough, the maximum viable amount of industrial floorspace will be required. and the re-provision of B1 (c), B8 and B2 use at ground floor/basement level should be undertaken as part of development consistent with a plot ratio of 0.65. • Given the intensification of development in the area it is likely the concrete batching plant will be an important component to supporting delivery of new homes. Residential development on the adjacent sites (if in advance of the batching site) should be consistent with the 'agent of change principle' and not undermine the operation of that site. This principle should also apply to the operation of the proposed replacement business space provided on site, so that it creates business space that will remain viable for the long term. • The proximity to the stadium, railway and adjacent coach/car parking will require appropriate attenuation measures to deal with noise, vibration and disturbance to create a suitable living environment. 		


Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • A two-way road system at South Way/First Way is planned as highway improvements, new development should take this into consideration. • As industrial land the site may contain contamination that will need to be satisfactorily addressed to create a safe residential environment. • If the business space is provided in a separate building/s to the residential (i.e. not part of a vertically mixed use scheme), this will be required to be built to a standard ready for occupation prior to occupation of the residential development. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. <p>Risks</p> <ul style="list-style-type: none"> • Land is in multiple ownership which may prevent comprehensive redevelopment. Piecemeal development may prevent the most efficient land use. • Potential for occupiers to want to remain towards the end or after the end of the Plan period. <p>Design Principles</p> <ul style="list-style-type: none"> • The site falls within the Tall Building Zone however the proximity to the stadium means that the height of the development should respect this setting and provide a similar solution to that of development on site SW03/04/05 on further west along South Way, stepping up from the south/railway side and down towards the stadium from the eastern part of the site. • The proximity also encourages that design should be sensitive to the protected views of the stadium. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Active frontages should be created along South Way. ground floor business space may be able to provide this role, particularly if buildings are vertically mixed use. • Developments must take care to ensure they do not compromise the ability of other sites within this allocation to make the most efficient use of land possible at a later date. • Where business industrial premises are being provide on-site, the design should support the amenity of both residential and business uses to ensure their long term compatibility. • Where possible existing trees should be maintained and new trees should be planted within the new development. • The proximity to the national stadium and adjacent coach/car parking means acceptable noise mitigation measures will be required to address event day activity. • <u>The proximity to the railway will require appropriate attenuation measures to deal with vibration to create a suitable living environment.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Small parcels of land at the on northern parts and south of the allocation along South Way may be required for future road improvements. • Green and sustainable infrastructure should be part of the development process and the development. • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> 		

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			<p>Justification</p> <ul style="list-style-type: none"> The site is located at the edge of the Wembley area development current approved masterplan for the land around Wembley Stadium and provides a key opportunity to create a better environment around the stadium meeting housing needs, but also re-providing quality employment industrial space for which there is a great need. The site has a number of environmental challenges particularly related to potential noise which will need to be overcome. The visibility of the development from significant distances away from the south means that a quality development is required that does not conflict with protected views. 		
MM21	5.1 Central Place	BCSA13, page 77	<p>Allocated Use</p> <p>Mixed Use with maximum viable a minimum of 0.65 plot ratio B1 business use, light industrial/ research & development floorspace with the remainder being of main town centre uses or residential</p>	To provide clarity following changes to the Use Classes Order and BE3.	Yes. Amendments to approach on delivery of industrial floorspace.
	5.1 Central Place	BCSA14, page 77	<p>Comments</p> <p>Re-provision of D4 community use, plus additional residential uses. Active frontage at ground floor.</p>	Clarity of proposed use consistent with use classes	No. only reflects changes to the Use Class Order.
	5.1 Central Place	BCSA15, page 77	<p>Address</p> <p>Site W10 Wembley Masterplan</p> <p>Land west of multi storey car park on South Way west of the National Stadium</p>	Clarity on location and provide proposed use consistent with	No. only reflects changes to the Use Class Order.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			Allocated use Retail or entertainment and leisure at ground, upper floors-B1 office or D2 entertainment and leisure	new Use classes	
	5.1 Central Place	BCSA16, page 77	Address Site NW04 Wembley Masterplan <u>Land north of Engineers Way, between Brent Civic Centre and Olympic Way</u> Allocated Use A1-A5, D1 ground, D1, B1/C1/D2 uppers <u>Retail/food & drink/ medical or health services/ crèche, nursery or day centre/ Hotels and hostels/ Learning and non-residential institutions/local community</u> Comments Outline consent for A1-A5 and B1/C1/D1 uses and development parameters granted through 18/0968. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u>	Provide brevity and clarity of proposed use consistent with new Use Classes, provide a safe development consistent with national policy	Yes. Includes reference to new SFRA Level 2.
	5.1 Central Place	BCSA17, page 77	Southway Motors/Fourway Supplies/ Midnight Motors, South Way, HA9 0HB 0.33 Repair garages and storage Business and residential 60 Re-provision of business floorspace at 0.65 plot ratio required. Ground floor active frontage along South Way.	Policy deleted as conflict with SIL designation where only intensification is allowed.	No. Modification carried forward from submission version and has therefore been dealt

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
					with within section 9 of the Submission IIA.
	5.1 Central Place	BCSA18, page 77	Address Site W12 Wembley Park Boulevard, Wembley <u>Land between Ibis and Premier Inn, South Way</u> Allocated use A1-A4/B1/D1 and D2 uses. <u>Retail/food and drink/offices/ medical or health services/ crèche, nursery or day centre/ Learning and non-residential institutions/local community</u>	Clarity on location and provide proposed use consistent with new Use classes	No. only reflects changes to the Use Class Order.
	5.1 Central Place	BCSA19, page 77	Size (ha) <u>0.34</u>	Factual update	No, amendment for accuracy.
MM22	5.1 Central Place	BCSA20, insert new page	<i>Add new policy</i> <u>Site Plan</u>	New policy separated from BCSA7 for Clarity.	Yes. New policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			 <p data-bbox="721 1042 1048 1114">Existing Use Disused railway sidings</p> <p data-bbox="721 1158 1267 1230">Allocated Use Mixed-use residential-led development</p> <p data-bbox="721 1276 987 1348">Indicative Capacity 100</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Timeframe for Delivery 1-5 Years - 6-10 Years - 11+ Years <u>100</u></p> <p>Address <u>Wembley Park Station, Wembley, HA9 9AA</u></p> <p>Area <u>0.72 ha</u></p> <p>Description of Existing Site <u>The site lies to the north of the rail line running through Wembley Park Station. The site comprises disused rail sidings. The main road access to the site comes from Forty Avenue. To the north there is a nursing home and opposite the site on the other side of Forty Avenue is the Sattavis Patidar Centre. Across the railway line to the south are 4 residential blocks ranging from 5 to 8 storeys.</u></p> <p>Ownership <u>Site owned by TfL</u></p> <p>Planning History <u>No relevant planning history.</u></p> <p>PTAL Rating <u>4 (current and 2031 estimate)</u></p>		

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			<p><u>Planning Considerations</u></p> <ul style="list-style-type: none"> • <u>The site is located within the Wembley Opportunity Area and the Wembley Growth Area, making it suitable for residential, with the potential for mixed-use development along the Forty Lane frontage.</u> • <u>Vehicular access to the site from Forty Avenue could be constrained due to limited visibility and proximity of other junctions. This together with the site's accessibility to public transport may mean a car free development will be desirable.</u> • <u>Consideration of the wildlife corridor on site and development should contribute positively to the existing ecology, biodiversity, improve access to nature and its recreational function.</u> • <u>Future development will mitigate potential noise and vibration from the nearby train tracks.</u> • <u>The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area</u> <p><u>Risks</u> <u>no significant risks identified</u></p> <p><u>Design Principles</u></p> <ul style="list-style-type: none"> • <u>Consistent with the site's identification as a wildlife corridor, the development is required to address existing ecology through good design.</u> • <u>Buildings should mediate between the taller buildings on Matthews Close and the character of development along Forty Avenue and further to the north, however the site is not suitable for tall buildings of a significant scale.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>Sufficient set back from the railway lines will be required to assist in mitigating against potential adverse impacts of train movements/engineering works.</u> <p><u>Infrastructure Requirements</u></p> <ul style="list-style-type: none"> • <u>Green/blue and sustainable infrastructure should be part of the development process and the development.</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> <p><u>Justification</u></p> <p><u>London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, in particular through the redevelopment of sites around transport hubs. Other recent developments opposite the railway sidings along Brook Avenue suggest that the site can be intensified to provide a mixed-use scheme with a significant number of new dwellings. The site has good access to public transport and local infrastructure including shops and green spaces.</u></p>		

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MM23	5.2 East	5.2.8 Challenges and Opportunities, after page 81	<p><i>Insert after para 5.2.8, in table form:</i></p> <p><u>Challenges:</u></p> <ul style="list-style-type: none"> • <u>Limited accessibility to public transport, in particular rail or underground services. Low population density and layout means that opportunities to improve levels of service will only be along principal movement corridors where services already exist.</u> • <u>The North Circular Road and parts of the A5 Edgware Road are a significant physical divider of communities e.g. Neasden as well bringing environmental issues associated with noise, air pollution and poor townscape, particularly around junctions.</u> • <u>The area has only one town centre, Neasden, and a limited number of neighbourhood centres to act as focal points to bring communities together/ create a sense of place. Neasden effectively performs as a neighbourhood centre and faces increasing competition from competing centres in and out of the borough.</u> • <u>The employment areas are relatively low quality and have had limited investment over the years and from a developer perspective are more attractive for housing than new business space.</u> • <u>There is a very high proportion of private rented homes and Houses in Multiple Occupation in the Neasden area.</u> • <u>The southern parts particularly around Neasden are within the top 20% of deprived areas in the country, whilst areas around the North Circular perform only slightly better.</u> • <u>Most sites are in active use, so there are limited obvious significant development opportunities to meet housing, employment and infrastructure needs.</u> <p><u>Opportunities:</u></p>	Whole section added as it was missing in the printed version of the Regulation 19 Plan. Inclusion provides consistency with approach to all other places in the Local Plan.	No. SA undertaken within previous IIA despite not making its way into the published local plan document.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>The opening of the Thameslink Brent Cross West station in 2022 and proposed creation of a West London Orbital passenger route on the Dudding Hill freight line will significantly improve public transport accessibility in the vicinity of Staples Corner and Neasden station.</u> • <u>A large scale employment area at Staples Corner which is under-intensively used. Potential for a significant new mixed use community, or an extension to Brent Cross Opportunity Area in London Borough of Barnet as a gateway entrance to Brent. The size of the area provides the critical mass to provide associated site specific infrastructure.</u> • <u>Consolidate and improve the offer at Neasden town centre including townscape/ connectivity improvements across and around the North Circular Road/ new street market</u> • <u>Extensive areas of open space, popular and good quality suburban housing with local infrastructure providing a high quality of life which is attractive to families.</u> • <u>To improve the setting and attractiveness of the Welsh Harp as a recreational and wildlife asset.</u> • <u>Using the potential developer interest in residential to invest in and intensify employment premises as well as providing much needed homes and affordable housing.</u> • <u>Existing main public transport movement corridors, e.g. A5 Edgware Road and Neasden Lane/ Blackbird Hill which connect to Growth Areas offer opportunities for intensification.</u> 		
MM24	5.2 East	BP2, Page 84	<p><i>Amend part c) and part d) of 'Character, Heritage and Design' of the policy to read:</i></p> <p>d) Along the intensification corridors of A5 Edgware Road and A4088 Blackbird Hill/Neasden Lane/ Dudden Hill Lane heights typically of up to 15 metres (5 storeys) are likely to be acceptable. Within Neasden town centre this will be 6 5 storeys will also be appropriate.</p>	To provide consistency with Local Plan (Policy BD2, BE1 and BE3), London Plan,	Yes. This regards amendment to part C, E and Ji.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>e) In other areas not subject to site allocations where designated heritage assets will not be adversely affected heights of buildings should go no higher than two storeys above the prevailing predominant heights.</p> <p><i>Amend part e) of 'Homes' of the policy to read:</i></p> <p>f) Minimum of 5,400 additional homes in the period to 2041, the potential residential development for Staples Corner Growth Area (with around 2,200 dwellings) and Neasden Stations' Growth Area (with around 2,000 dwellings) will be determined by their respective masterplans, taking account of the need to support additional employment industrial space on site. Depending on the capacity of these sites there may be specific requirements around different housing types, such as specialist (older people/ supported/ student) housing and build to rent</p> <p><i>Add new part ji) to 'Town Centres' of the policy to read:</i></p> <p>j) Additional residential on upper floors or making efficient use of plots through redevelopment will be supported in these centres to increase local population catchments.</p> <p>ji) <u>Provide up to 500 sqm comparison goods retail floorspace, and 200 sqm convenience foods retail floorspace by 2028. This should be directed toward Neasden town centre.</u></p> <p><i>Amend part k) of 'Community and Cultural Facilities' of the policy to read:</i></p> <p>k) Securing sufficient physical and social Infrastructure on and off site to support the <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development.</u></p>	<p>set out housing delivery, social infrastructure requirements, retail and leisure floorspace needs in this strategic policy for the Place.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>especially the provision of new education, health, cultural and community facilities, notably at</u> Staples Corner and Neasden Stations' Growth Areas, in particular <u>and</u> ensuring the improvement of the Welsh Harp and its setting.</p> <p>l) Securing the retention of the area's religious buildings</p> <p><i>Amend 'Employment and Skills' part of the policy to read:</i></p> <p>Supporting the local economy by:</p> <p>m) Retaining and encouraging intensification of employment <u>light industrial, general industrial and storage and distribution</u> uses at Kingsbury Locally Significant Industrial Site.</p> <p>n) Supporting transformational change of Staples Corner <u>and Neasden Stations</u> to provide co-location/ intensification and a wide range of new business premises fit for modern day occupiers in association with a new mixed use community.</p> <p>o) Retaining/ seeking re-provision of <u>a variety of</u> small scale employment in association with new development <u>and generally throughout the East Place.</u></p> <p>p) Supporting the relocation of College of North West London to a purpose built facility elsewhere in the borough through redevelopment of the existing Neasden site.</p>		
MM25	5.2 East	5.2.16, page 86	<p><i>Amend para 5.2.16 to read:</i></p> <p>The proposed Growth Areas of Staples Corner and Neasden Stations will provide the opportunities for new mixed use communities with a significant amount of employment<u>industrial</u> and residential floorspace. A masterplanning exercise will be undertaken <u>involving key stakeholders, landowners and developers to help shape the masterplan from conception to completion.</u> This will to identify the</p>	To reflect the level of engagement anticipated in the masterplanning process.	No, amendment for clarity only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			appropriate mix of uses and form of development with a view to improving employment opportunities as well as homes. Such large scale areas are also likely to require some on site social infrastructure which will need to be identified, taking account of needs of the proposed population and capacity/ability to meet needs in existing or extended facilities.		
	5.2 East	5.2.17, page 86	<i>Amend para 5.2.17 to read:</i> In these Growth Areas, land designated as SIL or LSIS in the previous Local Plan will need to address the requirement to, at a minimum replace, but ideally intensify employment-industrial uses too. A range of employment space will need to be provided, although only a very limited focus on office space will be appropriate.	To remove unnecessary reference to previous Local Plan and provide consistency with the London Plan	No, amendment for brevity and consistency only.
	5.2 East	5.2.18, page 86	<i>Amend para 5.2.18 to read</i> In advance of adoption of masterplan supplementary planning documents which will seek comprehensive solutions for the areas, small scale release of sites will be resisted, unless it can be shown that it will not <u>prejudice the delivery of a comprehensive masterplan</u> undermine the outcomes of any likely adopted masterplan.	Consistency of wording with policy and throughout plan.	No, amendment for consistency only.
MM26	5.2 East	BEGA1A Insert on page 88 after paragraph 5.1.30	Policy BEGA1A Neasden Stations Growth Area <u>The area around the existing Neasden underground station and a potential West London Orbital overground station will be transformed. In addition to around 2000 homes, the area will through co-location of industrial and other commercial floorspace, provide a major boost to business and employment opportunities. This will deliver a new varied supply of neighbourhood friendly modern industrial premises, studios and managed workspaces for</u>	To provide consistency with format of policies for other Growth Areas in the Plan.	Yes. New policy.


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			<p><u>local business needs as well as other commercial space to support a mixed use community. Space will be provided for and the development will integrate with a potential new West London Orbital Station accommodated adjacent to Neasden Lane. Tall buildings will be located close to the stations and along the south of the underground line whilst reducing in scale towards its residential edges.</u></p> <p><u>All developments will achieve the highest design standards. Energy efficient buildings using renewable energy and a district heating system will be delivered. Development will be supported by associated infrastructure which will be further drawn out by a masterplanning exercise including:</u></p> <ul style="list-style-type: none"> • <u>Improvements to the public realm, cycling and walking routes along Neasden Lane between the two stations and the Church End and Neasden town centres;</u> • <u>Provision of new public open spaces and improvements to the quality and accessibility of those existing such as on Dudden Hill Lane;</u> • <u>A series of play areas within new developments and open space;</u> • <u>Improvements to Neasden station's accessibility and capacity.</u> <p>5.2.33 <u>The area around Neasden station has a high level of public transport accessibility. This could increase further with the provision of an additional station. This potential station has been identified as part of the West London Orbital scheme, which is a TfL supported infrastructure project. If successful in attaining funding, this will be delivered during the lifetime of the Local Plan. The existing industrial sites around the station have relatively few landowners/ occupiers and are not as intensively used as their accessible location warrants. There is the opportunity to improve efficiency of use through retaining an industrial use with the provision of</u></p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>a range of replacement industrial premises co-located with residential properties consistent with London Plan policies. The proposed relocation of the College of North West London to Wembley, provides the opportunity for regeneration of a scale of area to be identified and planned as a Growth Area.</u></p> <p>5.2.34 <u>The area will be subject to a comprehensive masterplan approach which will be led by the Council. This will involve input from landowners, site occupiers, local residents and other relevant parties, such as TfL, at the appropriate time. It will provide further detail on how development can address the wide variety of potentially competing needs, including: needing to provide sufficient industrial floorspace consistent with London Plan policies and Brent’s local needs to provide additional floorspace across the borough that can sit alongside a substantial amount of dwellings; creating a positive residential environment on sites in close proximity to railway infrastructure and main roads; providing suitable levels of greenspace and social infrastructure to meet residents’ needs and reflecting the gateway status of the area around the station, whilst providing a positive relationship with the lower scale suburban residential surroundings that will remain.</u></p>		
MM27	5.2 East	BEGA2A, insert after page 88 and new BEGA1A main modification before site allocations.	<p><u>Policy BEGA2A Staples Corner Growth Area</u></p> <p><u>The Staples Corner Strategic Industrial Location will be transformed. In addition to around 2,200 homes, the area will through industrial intensification together with co-location of industrial provide a major boost to business and employment opportunities through increased floorspace. This will deliver new varied supply of modern industrial premises, studios and managed workspaces for London’s</u></p>	. To provide consistency with format of policies for other Growth	Yes. New policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>strategic needs and local business needs as well as other commercial space and social infrastructure to support a mixed use residential community.</u></p> <p><u>Working closely with LB Barnet and the Greater London Authority, the Council will seek to as best possible link it with and complement the Brent Cross Opportunity Area. It will also maximise the potential of the area to benefit from improved public transport connectivity to Central London and beyond provided by the new Brent Cross West Thameslink station and the potential West London Orbital.</u></p> <p><u>The potential for tall buildings will be considered taking account of the need to respect views from Golders Hill through to Harrow on the Hill and not have a detrimental impact on the Brent Reservoir Site of Special Scientific Interest, reducing in scale towards its residential and open space edges.</u></p> <p><u>All developments will achieve the highest design standards. Energy efficient buildings using renewable energy and a district heating system will be delivered. Development will be supported by associated infrastructure which will be further drawn out by a masterplanning exercise including:</u></p> <ul style="list-style-type: none"> • <u>Improvements to the public realm, cycling and walking routes along and across the North Circular Road and the Edgware Road;</u> • <u>Provision of three pocket parks and a series of open spaces and improvements to the quality and accessibility of those existing such as Neasden recreation ground and the Brent Reservoir/Welsh Harp;</u> • <u>A series of play areas within new developments and open space.</u> 	Areas in the Plan.	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><i>Add justification text after policy to read:</i></p> <p>6.2.33 <u>Staples Corner is a Strategic Industrial Location that plays an important part in meeting for industrial needs, but could perform much better. As a gateway to Brent from wider London, or those coming from further afield from the M1 in townscape terms it presents a poor initial impression of the borough. Although there are some relatively modern fit for purpose premises, many are older poor quality buildings that have received little investment. The area also includes many quasi-retail and other non-industrial uses that reasonably could be located elsewhere, allowing a focus on more strategic industrial needs. In addition, the strategic road network is heavily trafficked and engineered as an 'urban motorway' forming a significant barrier to pedestrian and cyclist movements. Positive recreational and ecological features such as Neasden Recreational Ground and the Welsh Harp/Brent reservoir Site of Special Scientific Interest are also hidden from view, with limited access points.</u></p> <p>6.2.34 <u>On the other side of the Edgware Road in the London Borough of Barnet is the Brent Cross Opportunity Area. 'Brent Cross Town' will be a mixed use area providing a residential community of around 6,700 homes with associated social infrastructure and other features such as 275,000 m² of office floorspace, business facilities for 25,000 employees, other commercial leisure, 14,000m² of indoor sports facilities and 20ha of parks.</u></p> <p>6.2.35 <u>The opening of the new Brent Cross West Thameslink Station in 2022 will improve public transport connectivity to central London and beyond. Potential West London Orbital services will further improve connections to west London and beyond. Staples Corner which has similar characteristics to Brent Cross Opportunity Area shows that potential that</u></p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>exists as an employment area, but also to provide additional new homes to meet the Borough's and London's needs.</u></p> <p>6.2.36 <u>The area will be subject to a comprehensive masterplan approach which will be led by the Council. This will involve input from landowners, site occupiers, local residents and other relevant parties, such as TfL, at the appropriate time. It will address how the area can better work in the future. This will seek to improve the amount and quality of industrial floorspace through intensification of sites consistent with London Plan and local plan policies, freeing up land for residential, but also potentially through co-location of industrial and residential uses in a transitional zone between the two predominate uses. It will identify the amount and location of potential dwellings, together with where intensification of industrial uses and the types of industrial uses, and the transition between the two will be considered as part of that process.</u></p> <p>6.2.37 <u>The Council is identifying the location as a Growth Area due to the scale of the opportunity. Given the need to maximise efficient use of land the area has been identified as a Tall Buildings Zone. This reflects the potential scale of development to create clusters and other characteristics of the area, plus the surrounding context of tall buildings being delivered to the north as part of the Hendon estate redevelopment and also as part of Brent Cross. The height and location of development will be considered as part of the masterplan taking into account local protected views from Golders Hill to Harrow on the Hill and seeking to not have an adverse impact on the birds in particular that support the protected status ecological designations of the Welsh Harp/Brent Reservoir.</u></p> <p>6.2.38 <u>As part of the masterplanning the amount of necessary social infrastructure together with other uses to support the new residential community will also be identified, as well as potential enhanced links to the new station, across the North Circular and Edgware Roads and access to and improvements to the extensive open spaces to the north.</u></p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>6.2.39 <u>The size and complicated nature of the area plus the need to engage with occupiers, landowners and other organisations with an interest in the area will mean an effective masterplan will require some time to finalise. As such no reliance has been placed on the site in meeting housing needs in the first half of the plan period.</u></p>		
MM28	5.2 East	BEGA1, page 90	<p><i>Insert new Site Plan:</i></p>  <p><i>Amend parts of the policy to read:</i></p>	<p>Amend boundary of site allocation so that it covers one contiguous area rather than individual sites.</p> <p>To increase brevity and make consistent approach across the housing trajectory, SFRA Level 2, Local Plan (Policy BH1) and London Plan policies, incorporate</p>	<p>Yes. Includes reference to new SFRA Level 2</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?						
			<p>Allocated Use Growth Area – Strategic Industrial Location and Locally Significant Industrial Sites subject to co-location and intensification, new passenger railway line infrastructure and residential development.</p> <p>Indicative Capacity Not yet known, Estimated to be 2000 dwellings subject to a masterplanning process which will provide additional clarity. Estimated using standard densities.</p> <p>Timeframe for Delivery <table border="0" data-bbox="748 612 1294 687"> <tr> <td>01-5 Years</td> <td>65-10 Years</td> <td>101+ Years</td> </tr> <tr> <td><u>0121</u></td> <td><u>735779</u></td> <td><u>12651100</u></td> </tr> </table> </p> <p>Description of Existing Site The site comprises Strategic Industrial Location and Locally Significant Industrial Sites, which incorporate light industry, storage, waste processing and open storage. It also includes a campus of the College of North West London which is relocating to a new site in Wembley. In between is some two storey residential, semi-detached and terraced, some of which is a former council estate. It also includes the Neasden Underground Station, with associated land and land on the West London Orbital rail route. To the south is a petrol station currently in use.</p> <p>PTAL Rating 3-6a both for now and in (Current and 2031 estimate). The potential West London Orbital station at Neasden will increase PTAL levels further.</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> A significant part of the site is Strategic Industrial Land/ Locally Significant Industrial Site (LSIS). The proximity of Neasden station means that consideration of this site for Co-location/ intensification consistent with 	0 1-5 Years	6 5-10 Years	10 1+ Years	<u>0121</u>	<u>735779</u>	<u>12651100</u>	<p>essential infrastructure needs, ensure publically accessible routes, reflect Secretary of State's London Plan modification directions. In addition, reflect the new Use Class Order, Compulsory Purchase Order need and existing waste site.</p>	
0 1-5 Years	6 5-10 Years	10 1+ Years									
<u>0121</u>	<u>735779</u>	<u>12651100</u>									

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>London Plan policies is appropriate. The potential for a further station on the West London Orbital line in the area together with the relocation of the College of North West London provide an opportunity for a much larger scale of development to be planned as a Growth Area.</p> <ul style="list-style-type: none"> • The Growth Area will be is subject to a masterplan process to comprehensively identify how the area it can best maintain and ideally increase above a minimum plot ratio of 0.65, for the current SIL and LSIS sites' employment industrial floorspace (predominantly light industrial, general industrial and storage and distribution), plus relate to and provide sufficient space to accommodate the new and existing transport infrastructure as part of a new mixed use community. • <u>The masterplanning exercise will be undertaken involving key stakeholders, landowners and developers to help shape its content from conception to completion.</u> • Until a masterplan has been completed/ adopted by the council, no redevelopments, particularly to industrial sites will be permitted in the area. <u>Developments of non-industrial uses will not be permitted on LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • The disparate land ownership also means that the council will have to be content that the necessary social and physical infrastructure to support the Growth Area's comprehensive change can be provided. This will either be through evidence of landowners working together and having mechanisms such as equalisation agreements in place, or that an alternative is available to the council of capturing sufficient contributions and the necessary land from proposed developments to deliver the infrastructure. On sites where there are a number of ownerships a comprehensive redevelopment of the whole site will 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>be expected, rather than a piecemeal approach to ensure the most effective and efficient use of the site.</p> <ul style="list-style-type: none"> • <u>In order to ensure a comprehensive approach to the masterplanning of the site, consideration will be given to the use of Compulsory Purchase Powers where necessary.</u> • It sits within an Air Quality Management Area, as such Development will have to seek to be air quality neutral positive and ensure occupants have an acceptable level of air quality. • The Dudding Hill Line and Jubilee/ Metropolitan Line corridors are Sites of Nature Conservation (SINC) Grade I. <u>Development should not adversely affect their ecological status.</u> • None of the site is within Flood Zone 3 for fluvial flooding. Parts are however in surface water Flood Zone 3. for surface water Much of this is highway land or the rail corridors, although it includes the industrial land south of Neasden station is also susceptible. As such a sequential approach to the location of uses and buildings will be required on these sites to ensure that the no unacceptable risk of flooding on and off site is not unacceptably increased. More detailed assessment will be required through a site specific flood risk assessment. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • The site contains no recognised heritage assets. A locally listed building Shortcroft Mead Court exists on the other side of Dudden Hill Lane. • Neasden Lane and Dudden Hill Lane are reasonably heavily trafficked. They provide reasonable pedestrian routes, but could pedestrians' environment should be improved through wider pavements, tree planting and additional overlooking/ active frontages. Regular bus services run along these roads and provide relatively good public transport accessibility to other locations in Brent. The proposed West London Orbital station will provide wider connectivity with Brent Cross/ West Hampstead though to Hounslow and improve PTAL. <u>High quality pedestrian links should be provided between</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>the existing and new station. Improvements should also be made to the connectivity with Church End and Neasden town centres.</u></p> <ul style="list-style-type: none"> • It also contains waste facilities which need to be addressed in any development, either off or on-site as there is a need to accommodate these types of facilities in the borough. <u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u> • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Potential noise associated with the roads and adjacent employment uses will have to be addressed in design of development. • As a transformational area <u>it has been identified in the Tall Buildings Strategy with</u> the area has the potential for tall buildings of over 10 storeys and has been identified as such in the Tall Building Strategy. This potential including Appropriate heights, extent and location of these will be identified in the masterplan and more detailed townscape/ views assessment. The proximity and essentially two storey suburban character of adjacent areas will however require heights to step down towards these edges. • The scale of development also means that a district energy/ heating system should be viable for delivery. • Apart from the railway corridors there is very little of ecological value inside the area; incidental planting is limited. There are a number of trees along the Neasden Lane and Denzil Road, a few are street trees, some form part of planting schemes associated with development and some are self-sown. The trees do provide some visual amenity however, their Removal and replacement of trees along the Neasden Lane and Denzil Road with higher quality <u>appropriate</u> specimens of more appropriate trees for the setting would be acceptable. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • The existing open space along Doldis Dudden Hill Lane should be enhanced, or potentially incorporated in another location in the development if this provides better townscape and recreational outcomes. • There is a notifiable pipeline bordering the site that is allocated for the potential station and parts of the residential areas south west of the site. • <u>The presence of an existing active rail aggregate depot to the west plus matters such as the proximity to operational railways and the need to re-provide industrial uses on site needs to be considered to ensure future development proposals do not place unreasonable restrictions on non-residential uses whilst creating a high quality residential environment.</u> • <u>Development around the existing or proposed rail stations and close to infrastructure should take account of operational requirements and the potential need to provide mitigation for any impacts.</u> • <u>Masterplanning should consider the potential for a future bus/cycle/pedestrian link between Neasden Lane and Great Central Way and if possible allow sufficient space within layout to allow this longer term aspiration to be delivered.</u> <p>Risks</p> <ul style="list-style-type: none"> • Fragmented nature of land ownership could increase time taken to deliver and if not properly managed a piecemeal rather than comprehensive approach to redevelopment, resulting in a disjointed environment and inadequate infrastructure. • Non-delivery of the West London Orbital line/ associated station. • CPO of properties/ land to deliver the rail infrastructure/ station and regenerate existing housing sites or employment industrial sites. • GLA policy in relation to acceptability of proposals on LSIS SLL. <p>Design Principles</p> <p>To be fully drawn out in any future masterplan. Key points to address will be:</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • ensuring successful co-location/ intensification to allow the area to prosper as an employment industrial location; • Integration of the new station and links between it and Neasden station within the new townscape; • Recognition of the gateway location of the area; • Providing higher quality public realm/ pedestrian/ cyclist environment particularly in allowing movement along Neasden Lane and Dollis Dudden Hill Lane; • The edges of the development responding to the adjacent suburban housing context; and • The significant noise constraints provided by the railway lines and potentially other non-residential uses where the 'agent of change' principle will apply. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site in particular. • <u>Neasden station has a constrained ticket hall and stairways. TfL has identified that there may be a need to consider station improvements to accommodate development related demand, with associated financial contributions.</u> • Improved crossings/ street design/ public realm, green infrastructure, open space and space for proposed public transport improvements including the West London Orbital line and station <u>with potential for platforms for up to 8-car trains.</u> • Religious buildings and youth facilities are particular current needs that need consideration as well as specialist housing needs. The College site has sports facilities which Sport England have indicated should be retained/ replaced. • Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development 		

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			<p>and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are Public sewers crossing or are close to the site. The risk of damage during construction must be minimised, and It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p> <ul style="list-style-type: none"> • <u>Prior to adoption of a Masterplan the Council will engage with TfL and Highways England in assessing impacts on the Strategic Road Network from the Growth Area as a whole. This will be based on an individual Transport Assessment using an appropriate method of modelling that will take account of any agreed updates to TfL strategic modelling. Where identified appropriate planning conditions, S106 obligations and Community Infrastructure Levy to deliver measures to mitigate significant impacts on the Strategic Road Network will be required.</u> <p>Justification</p> <ul style="list-style-type: none"> • The site adjacent to Neasden Lane is currently mostly low intensity used Strategic Industrial Land and Locally Significant Industrial Sites LSIS that are adjacent to a station with very high public transport accessibility. This accessibility makes them from a planning perspective a prime site for more intensive use of land. • Given Brent's status as a 'provide capacity' borough for employment space in the London Plan, need to provide for additional industrial floorspace, the SIL and LSIS also provides a vital role in meeting future employment industrial needs. Site owners/ developers are showing interest in bringing sites forward. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?						
			<ul style="list-style-type: none"> The proposed West London Orbital route requires appropriate safeguarding of land, but also provides an opportunity to increase the area's accessibility and potential for regeneration. In addition a large potential development site is the College of North West London's campus which is to be disposed of to fund a move to Wembley and improved facilities. Taking these factors together there is an opportunity to properly plan a wider 'Growth Area'. This can comprehensively reconsider the area's role, to potentially increase its performance as an employment area, but also address other strategic needs, such as using land more effectively, providing new homes, ensure successful delivery of a key piece of transport infrastructure and improve the image of Brent on a gateway site. It also will assist in providing additional population to support Church End and Neasden town centres. 								
MM29	5.2 East	BEGA2, page 93	<p><i>Amend parts of the policy to read:</i></p> <p>Existing Use Primarily B1, B2, B8 Light Industrial, General Industrial, Storage and Distribution and Sui Generis Employment Uses, trade counters and some retail, cash and carry, restaurants and residential.</p> <p>Indicative Capacity Not yet known, Estimated to be 2,200 dwellings subject to a masterplanning process which will provide additional clarity—estimate of numbers used at this stage.</p> <p>Timeframe for Delivery</p> <table border="0"> <tr> <td>01-5 Years</td> <td>05-10 Years</td> <td>101+ Years</td> </tr> <tr> <td>0</td> <td>0</td> <td>2200</td> </tr> </table>	0 1-5 Years	0 5-10 Years	10 1+ Years	0	0	2200	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BH1 and Policy BD2) and London Plan policies. Incorporate	Yes. Stronger protection for SSSI and reference to flooding potential.
0 1-5 Years	0 5-10 Years	10 1+ Years									
0	0	2200									

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Description of Existing Site</p> <p>The site covers a multiple of light industrial, heavier industrial and distribution uses, plus other uses such as wholesale and trade counter in differing types of buildings, from the relatively modern fit for purpose industrial to the majority of older poor quality buildings that have received limited investment. a mixture of old and more modern premises of varying heights and quality. As the site is very visible from heavily trafficked roads there are also many wholesale, trade counter type/ showroom operations related to building/ home improvement and car sales, plus self-storage and a large Chinese supermarket with a distinctive landmark building. Predominantly buildings are single storey, some contain two storey office elements. There are a small number of three storey and four storey buildings. Exceptionally two former office buildings of 4 and 7 storeys have through permitted development been converted into flats.</p> <p>Some buildings face outwards, others present their backs to streets. Multiple small site ownerships, plus the development of the area in a lot of cases before statutory town planning system came into effect has resulted on some sites in haphazard building placement, poor access arrangements and a poor public realm. As a gateway to Brent and wider London for many people passing through, it gives an extremely poor initial impression.</p> <p>The site It is bounded on the north by the Welsh Harp/Brent Reservoir and Neasden Recreation Ground open spaces. To the east is the A5 Edgware Road, beyond that warehousing and the Brent Cross/Cricklewood Opportunity Area in London Borough of Barnet. To the south and east there is residential development, principally semi-detached or terraced two storey dwellings and some very limited number of 3-6 storey properties.</p>	<p>essential infrastructure needs, new UCO, address impacts on existing SSSI, address flood risk, improvement to public transport, reflect Secretary of State's London Plan modification directions.</p>	

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			<p>The heavily trafficked North Circular Road cuts through the northern part of the area. It is a very heavily trafficked road. This together With the Edgware Road is essentially designed as urban motorway, elevated in part and it presenting a very hostile 'concrete jungle' pedestrian and cyclist environment, particularly for pedestrians and cyclists. This most intense around the Staples Corner roundabout. There are A number of footbridges across the North Circular. Direct vehicular access to and from these main roads is mostly limited, with more recent developments channelled towards minor roads resulting in. The dual carriageway with barriers means if turnings are missed, longer vehicle journeys diversions are required to return to that point by vehicle.</p> <p>PTAL Rating 3 (Current and 2031 estimate) principally along the North Circular Road, Edgware Road, Oxgate Lane and Humber Road and elsewhere 2 (Current and 2031 estimate) away from these roads. This is both currently and projected in 2031. This does not currently factor in The potential improvements to public transport offered by the West London Orbital station at Brent Cross West will increase PTAL levels.</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is Strategic Industrial Land and is proposed as a Growth Area and for co-location/ intensification consistent with London Plan policies. • It will be subject to a masterplan process undertaken between Brent, Barnet and the GLA. This will to comprehensively identify how the area can best maintain and ideally increase useable employment industrial floorspace (predominantly light industrial, general industrial and storage and distribution). This will representing a minimum 0.65 plot ratio or replacement of the existing amount of employment industrial floorspace, whichever is the greater, whilst potentially providing a new mixed use community. 		

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			<ul style="list-style-type: none"> • Until a masterplan has been completed/ adopted by the council no non-industrial/ residential will be permitted in the area. <u>Developments of non-industrial uses will not be permitted in the growth area until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • The disparate land ownership also means that the council will have to be content that the necessary social and physical infrastructure needed to support the Growth Area's change can be provided. This will either be through evidence of landowners working together and having mechanisms such as equalisation agreements in place, or that an alternative is available to the council of capturing sufficient contributions and the necessary land from proposed developments to deliver the infrastructure. • On sites where there are a number of ownerships a comprehensive redevelopment of the whole site will be expected, rather than a piecemeal approach to ensure the most effective and efficient use of land. • If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered. • Across the Edgware Road within the London Borough of Barnet the area is designated as the Brent Cross Opportunity Area and is subject to substantial growth of housing, employment and retail floorspace. Ideally The masterplanning process will address this wider growth context <u>being delivered in the Brent Cross Opportunity Area</u> and seek to explore the extent to which Staples Corner Growth Area can seek to create a unified place/ townscape between the two. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • It sits within an Air Quality Management Area. as such Development will have to seek to be air quality neutral positive and ensure occupants have an acceptable level of air quality. • The northern edge is adjacent to Welsh Harp and Neasden Recreation Ground, these have a variety of designations including Metropolitan Open Space, Brent Reservoir Site of Special Scientific Interest, Site of Nature Conservation Grade I and Local Nature Reserve. The Canal and River Trust have been working with the Brent Catchment Partnership on reducing pollution and invasive species and for it to become an attraction to Brent's population of being by water. Natural England have also identified, given the ecological status of the area, the need to protect the SSSI particularly with regards to potential disturbance from visitor recreational activities. As such, the Masterplanning also needs to consider the extent to which the potential of this area as a recreational and environmental asset can be enhanced in association with the Staples Corner Growth Area. Natural England have indicated that the height and position of buildings should not adversely impact on the flightpaths and behaviours of breeding wetland birds. • None of the site is When taking account of climate change a small part is within fluvial Flood Zone 3 for fluvial flooding. Parts are however in surface water zone 3 for surface water, principally although not exclusively this is within highway land. Appropriate site specific flood risk assessments will need to be undertaken in these locations to ensure no unacceptable risk of flooding on and off-site. • The site contains recognised heritage assets in the form of Sites of Archaeological Interest at Oxgate Field (north of North Circular) and is in close proximity to one at Oxgate Farm (Coles Green Road) which is also contains 2 Grade II* listed buildings. Development in or adjacent to these areas will require the appropriate assessments to ensure the assets and their settings are preserved or enhanced. It has no local views. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Potentially parts of the site could benefit from a high quality outlook across the Welsh Harp or if opened up allow better views from the North Circular to it. Views from the Welsh Harp need consideration in terms of design to improve its setting. • The North Circular Road managed by TfL as part of the strategic road network is very heavily trafficked, the Edgware Road less so, but still busy. They are managed by TfL as part of the strategic road network. They are a significant barrier to pedestrian movements, which are enabled by foot bridges and traffic light controlled crossings. The Edgware Road in particular at this point appears heavily over-engineered for the volume of traffic that uses it. Improving the pedestrian and cycling environment will be a particular challenge, especially to the carriageway both in terms of not adversely affecting capacity and cost to amending highway structures. Regular bus services along these roads and others provide relatively good public transport accessibility. Brent Cross West Thameslink station will open in 2024 which could also be served by the West London Orbital in 2026. Therefore wider connectivity with London and the south east is potentially very good in the future from this station. Better pedestrian links across the A5 and North Circular Road should be provided. <u>The Council together with TfL will consider the extent to which the area can support car-free development and mitigate impacts through suitable improvements to public transport, active travel and measures to not adversely impact on neighbours' amenity of any potential parking displacement. Brent Cross West Thameslink station will open in 2022 which could also be served by the West London Orbital in 2026. There is a need to work with TfL and Barnet Council to provide improved pedestrian and cycle links from the site across the A5 Edgware Road to the proposed new station and wider Brent Cross regeneration area. These are also required across the North Circular Road which is managed by TfL as part of the strategic road network.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. Potential noise associated with the roads and adjacent employment industrial uses will have to be addressed in design of development. • As a transformational area it has been identified in the Tall Buildings Strategy with the area has the potential for tall buildings of over 10 storeys and has been identified as such in the Tall Building Strategy. This potential including Appropriate heights, extent and location of these will be identified in the masterplan and more detailed townscape/ views assessment. LB Barnet locally protected views from Golders Hill to Harrow on the Hill cross the site. Natural England have indicated for potential impact on the flightpaths and behaviours of breeding wetland birds. These matters should be considered in relation to positioning and location of tall buildings. The proximity and essentially two storey suburban character of adjacent areas together with the ecological status of the Brent reservoir will however also require heights to step down towards these edges. • The scale of development also means that a district energy/ heating system should be delivered. • There is very little of ecological value inside the area as incidental planting is limited. There are few trees, the best examples being street trees are on Oxgate Lane and a bank of poplars on Coles Green Road, probably from the 1950s. Whilst of significant visual amenity, the poplars due their age and increasing propensity for limbs to fail/fracture are unlikely to be suitable for long term retention in their current form. These should be retained and additional street trees and green infrastructure should be provided. • The Brent Open Space Study identified a need for 3 pocket parks and a series of open spaces to meet the needs of the anticipated increase in population in the Growth Area. <p>Design Principles</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • To be fully drawn out in any future masterplan. Key points to address will be: <ul style="list-style-type: none"> • ensuring successful co-location/ intensification to allow the area to prosper as an employment industrial location; • Recognition of the gateway location of the area; • Providing higher quality public realm/ pedestrian/ cyclist environment particularly in allowing movement across roads and linking to Brent Cross West station/ adjacent Opportunity Area in London Borough of Barnet. • Opening up views to and enhancing views from Welsh Harp and improved physical connections; and • The edges of the development responding to the adjacent suburban housing. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site in particular. • Improved crossings/ street design/ public realm, green infrastructure, open space and public transport accessibility. • Religious buildings and youth facilities are particular current needs that need consideration as well as specialist housing needs. • Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are Public sewers crossing or are close to the site. The risk of damage during construction must be 		

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			<p>minimised, and It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p> <ul style="list-style-type: none"> Highways England has identified that development should not significantly impact on the operation of the M1 motorway. <u>Prior to adoption of a Masterplan the Council will engage with TfL and Highways England in assessing impacts on the Strategic Road Network from the Growth Area as a Provide sufficient clarity on potential infrastructure requirements to mitigate against significant adverse whole. This will be based on an individual Transport Assessment using an appropriate method of modelling that will take account of any agreed updates to TfL strategic modelling. Where identified appropriate planning conditions, S106 obligations and Community Infrastructure Levy to deliver measures to mitigate significant impacts on the Strategic Road Network will be required.</u> <p>Justification</p> <ul style="list-style-type: none"> The site is the largest piece of Strategic Industrial Land that falls within the Local Plan boundary. Given <u>the need within the borough to provide additional industrial floorspace capacity</u> Brent's status as a 'provide capacity' borough in the London Plan, it will perform a vital role in meeting future employment industrial needs. Currently although vacancy is low, it is not intensively used, contains many old buildings that have had very limited investment, includes many non-business uses which could be accommodated outside dedicated employment areas and is an overall poor quality environment in a gateway location. <u>Close proximity to</u> The development of the Brent Cross Opportunity Area across the Edgware Road in LB Barnet with its associated planned extension of Brent Cross shopping centre, provision of office development, residential and the opening of Brent Cross West Thameslink station and potentially the 		

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			<p>West London Orbital rail route will change the local environment and the area's accessibility. It provides an opportunity to reconsider the area's role, to potentially increase its performance as an employment area, but also address other strategic needs, such as providing new homes, improving the image of Brent on a gateway site, increasing the visibility and relevance of Welsh Harp as an environmental asset and addressing significant physical barriers to pedestrian and cycle movement across the borough.</p>								
MM30	5.2 East	BESA1, page 97	<p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Mixed use development including on the ground floor and upper floors if needed to accommodate the required floorspace, replacement of the existing employment B1-B8 light industrial and storage and distribution floorspace and on the McDonalds site A1-A5 retail or takeaway and/or light industrial and storage and distribution B1-B8 employment uses, with the remainder being residential on the upper floors.</p> <p>Indicative Capacity 3886 sqm light industrial and storage and distribution B1-B8 on the existing local employment sites (0.5 plot ratio) and 400 sqm retail or takeaway A1-A5 uses/ light industrial and storage and distribution B1-B8 on the McDonalds site (replacement of existing floorspace, with potential for more employment), plus 194 dwellings.</p> <p>Timeframe for Delivery <table border="0"> <tr> <td>01-5 Years</td> <td>65-10 Years</td> <td>101+ Years</td> </tr> <tr> <td>42</td> <td>37</td> <td>117</td> </tr> </table> </p> <p>PTAL Rating 3 existing and forecast to (Current and 2031 estimate).</p>	0 1-5 Years	6 5-10 Years	10 1+ Years	42	37	117	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies. Incorporate essential infrastructure needs and new UCO.	Yes. Reference to new SFRA Level 2, removal of minimum amount of industrial floorspace and potential reprovision of town centre use.
0 1-5 Years	6 5-10 Years	10 1+ Years									
42	37	117									

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			<p>Planning Considerations</p> <p>The site has no designated heritage assets.</p> <ul style="list-style-type: none"> • The Neasden Conservation Area is located to its south east approximately 30 metres away at its closest. The site is bisected by Coombe Road which provides access to Roger Stone Court. Regular bus services provide links to Wembley and Neasden underground stations. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Parts of the site fall within fluvial flood zone 3. It also is All the site has a residual risk of reservoir flooding should a defence failure occur. A site specific Flood Risk Assessment will be required and a sequential approach to the local location of uses followed. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • There is limited green infrastructure on site. There is some minor recent landscaping on the McDonalds site. There is A semi mature Ash tree along Coombe Road which will need to be kept. • There are also some trees adjacent along the River Brent and Brent Canal Feeder; both of these corridors are also Sites of Nature Conservation Value Grade 2. • Provision of industrial floorspace as part of a mixed use development should be maximised through a design led approach and viability testing. At the very least a replacement of the existing floorspace on individual sites that come forward, or a plot ratio of 0.65 whichever is the greatest will be required. • <u>Replacement of the existing McDonalds or provision of alternative town centre uses on this part of the site consistent with the size and role of the retail parade, will be supported.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Design Principles</p> <ul style="list-style-type: none"> • Development of up to 5/6 storeys (with the upper storey set back so as not to be visible from the adjacent pavement) with a step down to four storeys (top storey set back) on the edges of the will be acceptable on the Neasden Lane frontage. On Coombe Road up to 5 storeys will be acceptable with a set-back on the upper storey and reduction down to 4 storey on the edges. Within the remainder of the site up to 5 storeys will be acceptable. • A contemporary design will be supported, particularly where development takes influence from the positive characteristics of the surrounding buildings and structures, for example in breaking up the facades in a manner consistent with the plot width/ rhythm of the terraces along Neasden Lane. • Active frontages will be maximised at ground floor on Neasden Lane and Coombe Road. Ideally these will be principally provided by the employment/ commercial elements. • The areas adjacent to the River Brent and Brent Canal Feeder should be set back from the boundary, appropriately landscaped and include a footpath to allow for potential future public pedestrian routes adjacent to the watercourses. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Delivery of the waterside pedestrian routes and their future potential to be made available for public use attaching to future additions will be sought through a S106. • A financial contribution towards real time information being provided at the bus stop on the opposite side of the road will be sought. • Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior 		

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			<p>to the development creating identified additional capacity requirements. Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p> <p>Justification</p> <ul style="list-style-type: none"> • The site is a poor piece of townscape and could be used more intensely given its used to a relatively low intensity given its position adjacent to a main movement corridor. The McDonalds in particular is a poor piece of townscape inconsistent with the small set back from the edge of pavement/ strong building line along the rest of the road. Other recent developments along Neasden Lane indicates that sites can be used more intensively to provide mixed use schemes that provide employment opportunities/ services as well as adding to the dwelling stock. The site has good access to public transport and local infrastructure including shops and open spaces. • The council needs to ensure Continued provision of employment industrial space is required to meet needs, so will seek its retention of employment uses on site. • The existing Replacement McDonalds/retail is a draw that helps the vitality and viability of the parade. Its replacement or provision of alternative town centre uses on this part of the site, if consistent with the size and role of the retail parade, will be supported. • The sites are in close proximity to watercourses and partly at Risk of flooding. The location of buildings and their design will have to ensure that there is no unacceptable risk to building occupants, or property and people elsewhere as a result of any proposed development. needs to be properly addressed. • Setting back buildings from the watercourse provides an opportunity for their enhancement and also potential future public access along pedestrian routes. 		

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MM31	5.2 East	BESA2, page 99	<p>Allocated Use</p> <p>Mixed use development to include replacement or relocation of bus depot in lower ground floor and upper floors (offices on Edgware Road frontage if needed) to accommodate the required floorspace with the remainder being residential on the upper floors</p> <p>Indicative Capacity 10,000 sqm Sui Generis based on the existing employment industrial site's floorspace required to replace bus depot/ create suitable residential environment above, plus 202 dwellings.</p> <p>Timeframe for Delivery <table border="0" data-bbox="748 692 1294 762"> <tr> <td>01-5 Years</td> <td>65-10 Years</td> <td>101+ Years</td> </tr> <tr> <td>0</td> <td>0</td> <td>202</td> </tr> </table> </p> <p>Description of Existing Site The site comprises two separate land ownerships, the majority by Transport for London Metroline. A part single storey and three (+ basement) bus depot fronting Edgware Road to the east, with associated bus parking across the majority of the site. In addition there is a single storey café on the south eastern corner along Edgware Road. The site drops away from Edgware Road. It is bounded on the east by the Edgware Road. On the opposite side of Edgware Road are a mixture of industrial/ self- storage and retail premises, forming part of the Colindale Area Action Plan boundary in London Borough of Barnet. The north and south are bounded by railway lines which is elevated on the south and at grade on the north. There is two storey residential to the north and a mixture of single storey retail/ three storey residential to the south.</p> <p>Ownership Public and Private Sector</p>	0 1-5 Years	6 5-10 Years	10 1+ Years	0	0	202	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE2), London Plan policies, and incorporate essential infrastructure needs.	Yes. Changed reference from employment to industrial
0 1-5 Years	6 5-10 Years	10 1+ Years									
0	0	202									

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			<p>PTAL Rating 1b and 3 existing and forecast to (Current and 2031 estimate).</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site has no designated heritage assets and there are none in close proximity. Six regular bus services provide links north and south along the Edgware Road to Alperton, Brent Cross, Brent Park, Edgware, Golders Green, Hammersmith, Kilburn, Paddington, Victoria and White City. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Parts of the site towards its western end fall within surface water flood zone 3. A site specific Flood Risk Assessment will be required and a sequential approach to the local location of uses/ buildings followed to ensure that the development does not create an unacceptable on or off-site flood risk. • There is very limited green infrastructure on site. The majority is Adjoining in the railway land which is a Site of Important Nature Conservation Grade 1, forming part of a wider corridor, which includes trees and scrub. Development should not undermine these this designations. There is a semi mature and two newly planted London Plane street trees on Edgware Road which will need to be kept. • The site is a Locally Significant Industrial Site. Any proposal must ensure the replacement of the bus depot, or if An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere. If operationally this is not required, provision of industrial floorspace as part of a mixed use development should be maximised through a design led approach and viability testing. 		

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			<ul style="list-style-type: none"> • At the very least a A minimum 0.65 plot ratio or replacement of the existing industrial floorspace total, or a plot ratio of 0.65 whichever is the greatest will be required. • Commercial development along Edgware Road at ground floor level may also be appropriate if the minimum employment industrial floorspace is provided. Residential will be appropriate on the upper floors of any redevelopment if it can be shown to not undermine the bus depot/ future employment uses. <p>Risks</p> <ul style="list-style-type: none"> • The main risk is the Site availability of the site for development in the context of Transport for London operational requirements from Transport for London. Increasing importance of public transport, plus land pressures mean sites to relocate to will be scarce, whilst redevelopment may well prove difficult whilst the site remains operational. <p>Design Principles</p> <ul style="list-style-type: none"> • Development of up to 6 storeys (with the upper storey set back so as not to be visible from the adjacent pavement) along Edgware Road with a step down to five storeys (top storey set back) on the edges of the will be acceptable. • A contemporary design will be supported, particularly where development takes influence from the positive characteristics of the surrounding buildings and structures, for example in breaking up the facades in a manner consistent with the plot width/ rhythm of the traditional terraces along Edgware Road. • Active frontages will be maximised at ground floor on Edgware Road. Ideally these will be principally provided by the employment industrial/commercial elements and residential entrances. • <u>Setting back buildings from the railway lines provides an opportunity to enhance the wildlife corridors.</u> 		

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			<p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Additional vehicular entrance for the residential that does not conflict with the bus movements/ pedestrian crossing. • A financial contribution will be sought to additional street tree planting along Edgware Road outside the site. • Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. <p>Justification</p> <ul style="list-style-type: none"> • The site is used to a relatively low intensity in terms of its building occupancy given its position adjacent to a main public transport movement corridor. • It forms a poor piece of townscape along much of its length inconsistent with the edge of pavement/ small set back from the edge of pavement/ strong building line along the more traditional parts of the road. • Other Recent developments along this road indicates that sites can be used more intensively to provide mixed use schemes that provide employment opportunities/ services as well as adding to the dwelling stock. • The site has the Potential to deck over the bus garage use and provide an acceptable residential environment above. • It has good access to public transport and local infrastructure including shops, open spaces and schools. • The council needs to ensure continued provision of employment industrial space, so will seek the retention of the bus depot or replacement 		

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			<p>employment space on this site. In addition there might be some scope for provision of town centre uses along the Edgware Road frontage, if consistent with the size and role of a retail parade, will be supported. The site due to its fall and location below elevated rail corridors appears to be at risk of surface water flooding. The location of buildings and their design will have to ensure that there is no unacceptable risk to building occupants, or property and people elsewhere as a result of any proposed development. Setting back buildings from the railway lines provides an opportunity to enhance the wildlife corridors.</p> <ul style="list-style-type: none"> The site allows for taller buildings than currently exist on site, but is not within a tall buildings zone a location regarded as acceptable for taller buildings than those set out in the design principles. 		
MM32	5.2 East	BESA3, page 102	<p>Allocated Use D1 Medical or health service, crèche nursery or day centre, learning and non-residential institutions or local community use and residential</p> <p>Indicative homes 3057</p> <p>Comments Replacement D1 to address potential loss of community floorspace required.</p>	To make consistent with updated housing trajectory, reflect changes to Use Class Order and social infrastructure need.	Yes. Increased site capacity.

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MM33	5.3 North	BP3, Page 110	<p><i>Amend part b) of 'Character, Heritage and Design' of policy to read:</i></p> <p>Maintain and enhance local character and distinctiveness by:</p> <p>b) Respecting the predominantly suburban low rise character of the area. Tall buildings of 30 metres or more will be directed to the Burnt Oak and Colindale Growth Areas, in town centres around 18 metres (6 storeys) and intensification corridors around 15 metres (5 storeys) could be appropriate. In these areas development should be stepped down to form a comfortable relationship with adjacent areas.</p> <p><i>Amend part d) of 'Homes' of policy to read:</i></p> <p>e) Minimum of 2,800 additional homes in the period to 2041, principally through the continued residential development within the Burnt Oak and Colindale Growth Area (around 2,100 homes). The potential residential development for the extension of the Burnt Oak and Colindale Growth Area, referred to as Capitol Valley, will be determined by a masterplan, taking into account the need to intensify employment employment industrial use on the site.</p> <p><i>Amend part j) and part k) of 'Town Centres' of policy to read:</i></p> <p>j) Establish clear identities for the Colindale/ The Hyde and Burnt Oak through implementing public realm, building upgrades and shop facade improvements.</p>	To provide clarity on strategic housing delivery numbers across the Places, make consistent with Local Plan and London Plan policies. Better address social infrastructure needs, new UCO and the Retail and Leisure Needs study (EB_E_06).	Yes. This regards amendments to criteria D, K, and M.

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			<p>k) Provide up to 4,400 sqm of net comparison goods floorspace, up to 3,600 sqm 1,600 sqm of net convenience foods retail floorspace, up to 5200 sqm class A3 5200 sqm class A3 cafe/ restaurant floorspace and 2100 sqm class A4 2100 sqm class A4 drinking establishment floorspace by 2028. This floorspace should be directed towards the three town centres.</p> <p><i>Amend part m) of 'Community and Cultural Facilities' of policy to read:</i></p> <p>n) Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Secure sufficient physical and social infrastructure on and off site to support an increase in population at Burnt Oak and Colindale</p> <p>o) Explore opportunities for additional secondary school provision within this place.</p> <p><i>Amend part s) of 'Community and Cultural Facilities' of policy to read:</i></p> <p>s) Supporting new and improved employment employment industrial premises as part of a wider site development with Morrison's at Honeypot Lane (Lowther Road).</p>		
MM34	5.3 North	BNGA1, Page 116	<p><i>Amend second paragraph of the policy to read:</i></p> <p>The existing Locally Significant Industrial Sites will be subject to masterplanning with a view to its regeneration to re-provide updated employment industrial floorspace that meets employers existing and future needs, through co-location with other uses.</p>	Consistency with London Plan, housing trajectory, Council's evidence base	Yes. Dwelling numbers increased to reflect additional identified

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			<p>Burnt Oak/ Colindale Growth Area will deliver over 2,010 new homes to 2041, supported by social and physical infrastructure to include:</p> <ul style="list-style-type: none"> • Improvements to the quality and accessibility of existing local open spaces • A series of play areas within new developments and open space, <u>including a 0.2ha pocket park, and improvements to existing open space</u> • <u>The creation of informal recreation and good quality public realm</u> • Improved cycle infrastructure along the A5 	Open Space, Sports and Recreation Study.	capacity and includes new requirements for open space.
MM35	5.3 North	BNSA1, Page 118	<p>Existing use Locally significant industrial site containing a range of uses, such as car repairs, car show rooms, warehouses and distribution parks. <u>Outside the LSIS there are a mix of non-industrial uses including</u> a large retail superstore in the south eastern corner of the site, and a petrol station, an MOT shop and large car dealership with associated car parking/ storage in the north eastern corner.</p> <p>Allocated use Mixed-use development comprising areas of employment <u>industrial</u> intensification and co-location with other uses, retention of superstore of same size, or less, residential development and any associated required social infrastructure.</p> <p>Indicative capacity A future masterplanning process <u>involving site owners/ occupiers and other stakeholders</u> will provide clarity.</p>	<p>To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies.</p> <p>Incorporate essential infrastructure needs, industrial land re-provision, ensure publically accessible</p>	Yes, housing capacity and trajectory updated, greater clarity on industrial floorspace requirements.

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			<p>Timeframe for delivery 01-5 years 5 6-10 Years 10+ Years 14201 686300 599</p> <p>Description of existing site</p> <ul style="list-style-type: none"> • Capitol Way Colindale Locally Significant Industrial Land – The LSIS consists of A number of Predominantly small scale, 2 storey industrial units that are generally no taller than two storeys in height. The majority of units which form the LSIS are small, with only a small number of larger units. The majority of these larger units are located within the western part of the LSIS. Located to the east of the LSIS within the site allocation within the eastern part is a car dealership and associated servicing workshops, parking/ storage land. A petrol station forms the north westerneastern corner. • ASDA Superstore - Located in the south eastern corner of the site is one large superstore (ASDA) with a two-storey car park at the rear. • To the south of the site is Grove Park, social infrastructure (health centre, place of worship), residential development, Morrisons and Bang Bang Oriental Food Hall. To the west of the development is Stag Lane and residential development which is predominantly two storey in character. To the north of the site is residential development along Homstall Avenue and to the east is the A5 and new flatted residential development known as TNQ. <p>Planning history</p> <ul style="list-style-type: none"> • The ASDA superstore formed part of the previous Site Specific Allocation BC/1 in 2011. The allocation, which included the former 	<p>routes, clarity on master planning approach, air quality issues, identify existing SINC, and address engagement as part of the masterplan.</p>	

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			<p>Oriental City site, was identified for mixed use development which included residential, retail, food and drink, community facilities and leisure and the re-provision of Chinese and Far-Eastern commercial and community floorspace.</p> <ul style="list-style-type: none"> • Within the Capitol Way LSIS, permission (17/0837) has been granted for the <i>“Demolition of the existing buildings and redevelopment of the site to provide six buildings ranging between four to nine storeys and eight three storey mews houses, and the erection of a two storey commercial building, providing a total of 4,051m of flexible commercial floorspace across the site and 414 residential units”</i> at 1-8 Capitol Way. <p>PTAL rating</p> <p>The PTAL rating of the site ranges from 1b-3- <u>1b-3 (current and 2031 estimate)</u></p> <p>Planning considerations</p> <ul style="list-style-type: none"> • The site is included within the amended boundary of the Burnt Oak and Colindale Growth Area which has the potential to accommodate significant growth. • A significant portion of the site is designated as a Locally Significant Industrial Site. <u>The Council considers it appropriate for co-location which will be delivered consistent with London Plan policy E7.</u> • The whole site will be subject to a masterplan process to comprehensively identify how it can increase useable employment employment <u>industrial</u> floorspace <u>(resulting in a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever</u> 		

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			<p>is the greater), whilst contributing to the Council's vision for the Burnt Oak and Colindale area of creating '<i>a mixed, vital, accessible and pleasant district</i>'. Until a masterplan for the site has been agreed/ adopted by the council, no redevelopments (apart from 17/0837 that already consented) will be permitted within this area. <u>Developments of non-industrial uses will not be permitted on LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u></p> <ul style="list-style-type: none"> • <u>In order to ensure a comprehensive approach to the masterplanning of the site, consideration will be given to the use of Compulsory Purchase Powers where necessary.</u> • To the east of the site in the London Borough of Barnet is the Burnt Oak and Colindale Opportunity Area, with a regeneration and growth programme to deliver 10,000 new homes, a new neighbourhood centre and improved public transport services. The masterplanning process for this site should take into consideration the growth adjoining <u>in the Burnt Oak and Colindale Opportunity Area</u>, and seek to ensure <u>ing</u> that development contributes to creating a shared sense of <u>coherent</u> townscape/ landscape. • Located in the south-eastern corner of the site is a large retail superstore. The retail superstore is within an 'out-of-town centre' location. The store is well established and trading well. No alternative sites have been identified that could accommodate it in nearby Brent town centres. As such its retention is sought <u>In</u> 		

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			<p><u>recognition of its successful trading and the lack of local alternative sites, a supermarket should be retained</u>, although an increase in floorspace is not required. Any additional retail floorspace will be subject to the Sequential Test and an impact assessment. <u>Similarly the retention of a retail car dealership function on the Mercedes site is also considered appropriate if required as part of an intensification of floorspace and provision of other allocated uses on that site.</u></p> <ul style="list-style-type: none"> • The site currently contributes little to the frontage along Edgware Road. Any proposed Development will need to address this through creating an active frontage along its length of Edgware Road. • The site is located on a historical industrial site. A Preliminary Contamination Risk Assessment will be required, and if necessary remediation. • Furthermore, The areas of the site which directly adjoin the A5 are <u>is</u> located within an Air Quality Management Area. As such, development at this site should be air quality positive <u>as it is within a Growth Area.</u> • Noise associated with the adjoining roads and continued industrial/ employment uses on site will need to be addressed in the design of the development. • There is some potential for tall buildings, subject to stepping down towards the surrounding residential areas. The appropriate height, extent and location of buildings will be identified within a masterplan for the site. <u>The site is located within a Tall Buildings Zone.</u> 		

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			<ul style="list-style-type: none"> • The site is in close proximity to Grove Park, a local park which also contains a Grade II SINC site. The impacts of development on the integrity of the SINC through increased patronage of the park will need to be considered and if necessary appropriate mitigation provided. • None of the site is within Flood Zone 3 for fluvial flooding, however there are Parts of the site are within surface water flood zone 3 for surface water. These which are principally, although not exclusively, within highway land. The site is located within an area which is susceptible to groundwater flooding. • Edgware Road, which adjoins the site to the east, is relatively busy. The site is in an area of low PTAL and is located approximately a 12-minute walk from Colindale Tube Station. Development proposals will need to consider the impact that additional cars may have on the Edgware Road, and the surrounding road network. • Due to a relatively low PTAL score, some car parking spaces to serve the development are likely to be required. These should be designed to ensure that they do not have a detrimental impact on the streetscape of the development. • There is a bus stop which serves the site. <p>Risks</p> <ul style="list-style-type: none"> • Fragmented nature of landownership could increase time taken to deliver. Furthermore, This landownership could result in a piecemeal, rather than a comprehensive approach to 		

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			<p>redevelopment of the site, which could create a disjointed environment and inadequate provision on infrastructure.</p> <ul style="list-style-type: none"> • Potential for a lack of co-ordination with the London Borough of Barnet related to the cumulative impacts of the Burnt Oak/ Colindale Opportunity Area. <p>Design principles Key issues for any future masterplan to include:</p> <ul style="list-style-type: none"> • Ensuring successful co-location/ intensification to allow the area to successfully retain, and enhance its industrial/employment function. Factors to be considered include dedicated parking and services facilities. • Tall buildings on this site should respond to the height of the surrounding residential character and ensure that there is a stepping down towards 2-storey character to the north, west and part of the east. • Providing high quality public realm, which improves pedestrian and cycle movement and complements the work being undertaken in the Burnt Oak/ Colindale Opportunity Area. • Access to the site to be considered carefully to ensure no conflict is created between different users <u>and the potential for north-south and east-west pedestrian and cycle connections in particular between Stag Lane and Edgware Road to be enhanced in number and quality</u> • Interface between residential and industrial uses • Improving access to Grove Park (<u>which contains a Grade II listed SINC</u>), whilst ensuring the current green and open space on the site is maintained and enhanced. Additional green infrastructure is likely to be required to support development on site. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Creating an active frontage around the sites edges along streets and in particular along the Edgware Road frontage • Providing tree planting along the Edgware Road frontage to address air quality/ Healthy Streets agenda • The masterplan for the site will also need to take Taking into consideration the 'Burnt Oak and Colindale Placemaking Plan'. <p>Infrastructure requirements</p> <ul style="list-style-type: none"> • Due to the low PTAL score of the site, some car parking will need to be provided. • Retention and enhancement of undesignated existing green space and additional green infrastructure should be incorporated. • Improvements to the public realm should also be addressed. • Increased traffic at site could require some junction improvements, which will need to be determined through a transport assessment. • Social and physical infrastructure requirements to be fully drawn out in future masterplan work on the site. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to being required to meet additional demands created through the development. <p>Justification</p> <p>This site incorporates land within the Burnt Oak and Colindale Growth Area, and land which adjoins it. This area has previously been identified as a suitable location to accommodate growth, as well as providing an opportunity to boost business and employment</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>opportunities within the borough. Furthermore, provides an opportunity to create a new mixed use area providing many homes whilst the intensification/ co-location of the LSIS will contribute to meeting the 'provide capacity' status given to Brent within the London Plan strategic industrial floorspace requirements. Currently, although the vacancy rates are low, the site is not intensively used and contains a number of two storey buildings that vary in condition. The LSIS It also has good access to services and amenities which will support intensification/ co-location.</p>		
MM36	5.3 North	BNSA2, page 121	<p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Mixed use development to include residential, retail and employment replacement industrial and office space/affordable workspace.</p> <p>Timeframe for Delivery 0<u>1</u>-5 years 5<u>6</u>-10 Years 10+ Years 0 200<u>100</u> 300<u>400</u></p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> • The multi-storey car park is approximately 5 storeys in height and contains a car showroom on the ground floor. Adjoining and to the front of the multi-storey car park is a small area of hard and soft landscaping, which is being used to store cars associated with the dealership. • Southon House, an office block which forms the site's south eastern corner, is approximately 6 storeys in height. There is an 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BD2, Policy BSUI2, Policy BE2, Policy BE3), London Plan policies, incorporate essential infrastructure needs an industrial land re-provision. Provide clarity	Yes. Changed reference from employment to industrial.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>area of green space which sets the building back from the A5 road, which it adjoins to the east.</p> <ul style="list-style-type: none"> • Set back from the A5 is Colindale Retail Park, which consists of six retail units, which are in a horseshoe configuration with associated car parking. The retail units are two storeys in height, and are large and bulky in form. • Forming the southern part of the site is a car dealership, servicing centre/workshop and associated car parking. There are a number of structures located on this part, which are no taller than 3 storeys in height. The site is set back from the A5 by areas of green space and hardstanding that is being used to display cars. There is also an area of hardstanding to the west of the main building which is used as a staff car park. There are variations in site levels, decreasing in level from west to east. • <u>The site is set back from the adjacent Edgware Road by areas of hard and soft landscaping.</u> • To the north of the site is recently redeveloped residential properties, a primary school and mixed use buildings. To the east of the site is the A5, a 7-16 storey residential building and fast food outlet. To the south of the site is Colindale Town Centre, and to the west is 2 storey residential terrace development, where the predominant character is 2-storey terraced. <p>Relevant Planning History Some of the site formed part of the previous Site Specific Allocation B/C2. The allocation, was identified for 'Mixed used development to include residential and workspace, a proportion of which to be managed affordable workspace'. None relevant</p>	<p>on local heritage assets.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>PTAL Rating The PTAL rating of the site varies from 2-34. The majority of the northern and southern part is within PTAL rating 2, with the central part achieving PTAL rating 3-4 2-4 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is located within the boundary of the Burnt Oak and Colindale Growth Area, which has been identified by the council as an area which has the capacity to accommodate significant growth. • Due to the site's location within a Tall Buildings Zone transformational area, there is some potential for tall buildings, subject to stepping down towards the 2-storey character to the west of the site, and 2 to 3-storey character to the south-east of the site. • The site currently has a poor quality frontage along Edgware Road, with most buildings set back from historic building lines. The council has a desire to create active frontage between the two centres of Burnt Oak and Colindale. Redevelopment at this site should ensure that historic building lines are reinstated, and that active frontage is provided along Edgware Road this is achieved. • There are a number of trees fronting onto Edgware Road and along Hay Lane. Where possible, these trees should be retained and additional trees provided. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • The site is located within an Air Quality Management Area. As it is within a Growth Area such development at this site should be air quality positive. • Due to the site's location on a historic industrial site there is risk of contamination; a Preliminary Risk Assessment will be required, and if necessary remediation. • Potential noise associated with the adjoining road will have to be addressed in the design of the development. • The site adjoins the A5, with access to the retail park via a signalised junction. Access to the large car showroom is via Hay Lane. Due to the relatively low PTAL levels across this site, some car parking facilities will need to be provided. The council will encourage the use of lower parking provision, in line with London policy. The site allocation seeks to introduce a residential element to this site, whilst retaining its commercial and retail elements. To understand the likely impacts that this will have on local road networks As such, A transport assessment for this site will be required. This assessment, and potential transport infrastructure improvements that may be needed to support the redevelopment of this site. • <u>The site contains some existing Local Employment Sites in the form of industrial floorspace related to the servicing of vehicles as part of the car dealership and the office provision of Southon House. Industrial floorspace should be replaced in line with London Plan policy E7. The office space will be subject to Brent policy BE3. As it is out of centre, the site is not a priority location for retail in terms of the sequential test. Nevertheless, the Council is aware that the retail element</u> 		

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			<p><u>appears to be trading well, so is likely (subject to other London Plan and Local Plan retail policies) to be receptive to re-provision of some retail if it is necessary from a viability perspective to encourage the site's more intensive development that makes for a more efficient use of land.</u></p> <ul style="list-style-type: none"> • The site is in close proximity to Beis Yaakov Primary School and Nursery, which is a locally listed building. Development at this site should avoid having any detrimental impact on the setting of this building. • The site is located within an area which is susceptible to groundwater flooding. There are also small areas within the site which are susceptible to surface water flooding. The majority of the site is located within an area which is susceptible to sewer flooding. A flood risk assessment will need to address how development satisfactorily addresses these matters. • There are some variations in the site levels, especially within the southern part, which will need to be taken into consideration, particularly when considering heights for development. <p>Risks</p> <ul style="list-style-type: none"> • Multiple land ownership at this site could increase time taken to deliver. Furthermore, landownership, and could result in a piecemeal development coming forward, rather than a comprehensive approach to the redevelopment of the site. • Impact on the A5, and A5150 intersection as a result of introducing residential development at this site. <u>This may increase costs affecting viability or slow down delivery.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> Potential for lack of co-ordination with the London Borough of Barnet in relation to the cumulative impacts of the Burnt Oak/ Colindale Opportunity Area. <p>Design Principles</p> <p>Key issues for any future masterplan to include:</p> <ul style="list-style-type: none"> Residential development along Evelyn Avenue, which adjoins the site to the west, is predominantly two storeys in character. The western edge of the development should respond to the suburban nature of this area by ensuring there is a step down in height. Layout of the site should improve permeability, and ensure that there are links to the footpaths created as part of the adjoining site formerly occupied by Sarena House. Enhance and create active frontage along Edgware Road between Burnt Oak and Colindale Town Centres. Provide tree planting along the Edgware Road frontage to address air quality/ Healthy Streets agenda. Provision of higher quality public realm, which improves pedestrian and cycle movement, and complements the work being undertaken in adjoining Colindale Growth Area. Development at this site will need to take into consideration the 'Burnt Oak and Colindale Placemaking Plan'. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Increased traffic at site, as a result of residential developments associated parking, may require the current vehicular access to be reconsidered. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> Increased traffic at site, as a result of residential developments associated parking, may require the current traffic light junction vehicular access to be reconsidered. Due to relatively low PTAL rating of this site, some car parking facilities may be required, in addition to improvement to the existing traffic light junction including pedestrian crossing points as well as improvements to bus services/ bus stops Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to being required to meet additional demands created through the development. 		
MM37	5.3 North	BNSA3, Page 124	<p><i>Amend policy name to read:</i></p> <p>POLICY BNSA3 – HONEYPOT LANE QUEENSBURY LSIS AND MORRISONS</p> <p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Mixed use development – intensification at Honeypot Lane Westmorelane Road LSIS, co-location at Lowther Lane Honeypot Lane Lowther Lane LSIS. Redevelopment of the superstore site at Honeypot Lane, to include residential and retail floorspace.</p> <p>Timeframe for Delivery 01-5 years 56-10 Years 101+ Years 194 190- 193189</p>	Amend name to make correct reference to LSIS, increase brevity, make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies, incorporate essential infrastructure needs and include greater	No. Amendments for consistency, brevity and clarity only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Description of Existing Site</p> <p>There are three main areas which form this site allocation</p> <ul style="list-style-type: none"> • Honeypot Lane LSIS (Westmoreland Road) - Consists of a number of industrial units that range in size and are predominantly 2 storey and surrounded by poor quality public realm. • Morrisons Superstore - a single storey large supermarket and petrol station, with extensive surface car parking. • Honeypot Lane LSIS (Lowther Road) – the majority of the western portion of this LSIS site consists of two large units (B&Q and Selco) and associated car parking/ storage areas. The buildings take the form of warehouses, which are at least 8 metres tall. To the north and east in the site are smaller units, predominantly 2 storeys in height. • The Jubilee Line borders the site to the east. To the north and west of the site is Honeypot Lane, and suburban residential properties within the adjacent London Borough of Harrow, as well as to the north. To the south is the NHS Trust Kingswood Centre, the White Garden SINC site and residential and commercial development. <p>Planning History</p> <ul style="list-style-type: none"> • The Morrisons supermarket was previously identified as a site allocation (SSA 16) for 'Use of north and eastern section of car park for residential development including family sized accommodation. Alternatively, a mixed use development including residential and retail floor space'. • Planning permission (16/0595) has been granted for the 'Demolition of existing single storey temple building and erection of 	<p>consideration to potential impact of adjacent railway.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><i>a new 5 storey temple with a shikhar (tower), basement level for storage and plant equipment, ancillary library and educational use, priest accommodation, and a function room' at 6 Bowman's Trading Estate.</i></p> <ul style="list-style-type: none"> • Planning permission (18/2183) has been granted for the car park north east of Morrisons for the '<i>Erection of three buildings at 4, 5, and 7 storeys providing 194 residential units (76 x 1 bed, 75 x 2 bed and 43 x 3 bed), 60 car parking spaces (including disabled parking spaces), private and communal landscaped amenity areas, landscaped podium deck, secure cycle parking, recycling and refuse stores, access improvement and other associated developments'</i>, subject to the signing of a S106 agreement. <p>PTAL Rating The majority of the site is located within PTAL rating 3, with the Westmoreland Road LSIS within either PTAL 2 or PTAL 1a. <u>1a-3 (current), 2-3 (2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The Morrisons is in an out of centre location and trading well. There are no sequentially preferable locations available in Brent's town centres locally that could accommodate the store. Therefore the retention of a supermarket of similar size on site would be sought. As an out of centre site, sequentially it is not the preferred location for additional retail space/ town-centre uses. <u>In recognition of its successful trading, and the lack of alternative sites within the area, the supermarket should be retained although an increase in floorspace is not required.</u> 		

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			<p>Any such additional space will need to pass the sequential test and an impact assessment.</p> <ul style="list-style-type: none"> <li data-bbox="763 316 1673 898">• The site contains two Locally Significant Industrial Sites. The intensification and co-location of these sites will be consistent with London plan policy E7ies, which has identified Brent as a 'provide capacity' borough. <u>and result in a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater.</u> No permissions for non-employment uses within the LSIS will be allowed in advance of masterplans being approved which show how intensification/ co-location will work in practice/ be achieved to result in an increase in industrial floorspace. <u>Developments of non-industrial uses will not be permitted on LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> <li data-bbox="763 919 1659 1031">• <u>In order to ensure a comprehensive approach to the masterplanning of the site, consideration will be given to the use of Compulsory Purchase Powers where necessary.</u> <li data-bbox="763 1078 1673 1343">• The site is in proximity to a number of green spaces. Adjoining to the east is a wildlife corridor. To the north is the White Garden which is a Grade I SINC of borough importance. In close proximity to the east is Queensbury Circle. Development at this site should seek to enhance these green spaces and not disrupt the movement of wildlife. To complement these features, the inclusion of green infrastructure should be designed into the site. ^{MM?} 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • A significant proportion of the site is susceptible to groundwater flooding. There are also areas of the site which are at risk of surface water flooding, however these areas are being principally <u>within</u>, but not exclusively, highways and areas associated with car parking land. • The site is located on a historical industrial site. A Preliminary Risk Assessment for contamination will be required, and if necessary remediation. • The site is located within an Air Quality Management Area. As such, development at this site should be at least air quality positive. • Noise associated with the continued industrial use, or intensification of employmentindustrial uses on site will need to be addressed in the design of the development. • The use of the road to the rear of Morrisons as a TfL bus layover will also need to be taken into account. • There is some potential for taller buildings within this site boundary (around 6 storeys), but there should be a stepping down towards the neighbouring residential uses, which are predominantly two storeys in character.^{MM?} • To the left of the site is Honeypot Lane, which is a London Distributor road. A transport assessment for the site will be required to determine the impact that development at this site will have on the road network. • <u>Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Design Principles</p> <p>The design and layout of the area should be determined through the Masterplanning process. Key points that will need to be addressed within the masterplan include:</p> <ul style="list-style-type: none"> • Building heights should be around 6 storeys and should step down towards the adjacent residential that will remain. • Ensuring there is successful co-location/ intensification on the LSIS sites to ensure the area continues to prosper as an employment industrial location. • The site adjoins the Kingswood Centre which is an NHS building that provides a therapeutic environment of green space for patients. Development should ensure that there is not detrimental impact on its setting. • Incorporating green infrastructure throughout the design, which contributes to the conservation and enhancement of the adjoining and nearby green spaces. • Proposals should seek to promote walking and cycling, including making provision for a cycle route along Cumberland Road. • Improvements to public transport, improving pedestrian connections to Queensbury Station and creating an additional bus stand on Westmoreland Road. • Active frontage along Honeypot Lane, Cumberland Road and Lowther Road, ideally using innovative design to reduce or remove any inactive frontage associated with the supermarket. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Social and physical infrastructure requirements for this site to be fully drawn out in any future masterplan related to the residential capacity of the area. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> Retention of space for the 5 storey temple building on site. Improvements to public realm, incorporation of green infrastructure and improvements to public transport accessibility. Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to being required to meet additional demands created through the development. <p>Justification Within the boundary of the site are two areas of locally significant industrial sites, which are not intensively used and contain buildings which are in poor condition. Given Brent's status as a 'provide capacity' borough in the London Plan, The proposed intensification and co-location at these sites will contribute towards meeting future employmentindustrial needs. Furthermore, London Plan policy encourages the comprehensive redevelopment of low-density supermarket sites. The site is also located in an area of higher PTAL, in relation to the surrounding area.</p>		
MM38	5.3 North	BNSA4, Page 127	<p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Residential, community use, and employment space, some residential development.</p> <p>Indicative Capacity Unknown – will require detailed assessment as part of planning application. 50 dwellings</p> <p>Timeframe for Delivery</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential	Yes. New indicative capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>0-5 Years 56-10 Years 101+ Years <u>50</u></p> <p>Description of Existing Site The site contains a Grade II Listed purpose built inter-War 2000-seat cinema and associated front of house areas, and is a good example of a relatively unaltered super-cinema from this era. It was converted into a bingo hall in the 1960s and closed on bingo use in 2014. The building height ranges between two to three storeys. The main entrance of the building is located in the north eastern corner of the site.</p> <p>To the north of the site is new residential development which is to contain a 7 storey residential block with retail units on the ground floor. To the south of the site is a number of shops, with residential uses above. To the east of the site is residential development within the Barnet administrative area, which is largely 3 storeys in height. To the west is a residential area, which is predominately 2 storey in character.</p> <p>PTAL Rating The PTAL rating of the site ranges from 4-5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is located within the town centre boundary of Burnt Oak. As such, the council would like to see active frontage created on this site, where considered appropriate. 	<p>infrastructure needs.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Furthermore, the site is within the boundaries of the Burnt Oak and Colindale Growth Area, being a sustainable location to accommodate growth. • The former cinema on this site is Grade II listed and is a 'Building at Risk' contained on Historic England's Heritage at Risk Register. The cinema was constructed in 1938 and is a good example of a relatively unaltered large suburban neighbourhood super-cinema of the 1930s. Development at this site should ensure that proposals do not adversely affect its character as a building of special architectural or historic interest. • In comparison to other areas within Burnt Oak and Colindale, this site has relatively The site has a high PTAL levels. Therefore, development at this site should be car-free. • There are six trees within proximity to the site. Development at this site should not result in the loss of these trees. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Improvements to the public realm along Edgware Road to encourage the uptake of active travel. • <u>Thames Water will need to be engaged at the earliest opportunity to agree an infrastructure phasing plan to ensure essential water infrastructure is delivered prior to being required to meet additional demands created through the development.</u> 		
MM39	5.3 North	BNSA8 (comments), Page 129	Active frontage sought along ground floor of Turner Road. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'.</u>	Consistent with evidence base to	Yes. Reference to

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
				ensure safe development.	new SFRA Level 2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM40	5.4 North West	BP4, Page 137	<p><i>Amend part d) of 'Homes' of the policy to read:</i></p> <p>i) <u>Minimum of 2,285 additional homes in the period to 2041, principally through the Providing approximately 2,600 new homes as part of development within the Northwick Park Growth Area (around 1,600 net additional homes), including specialist accommodation to meet identified demand.</u></p> <p>j) Delivering mixed-use development on the Sainsbury's Kenton Road site</p> <p><i>Amend part f) of 'Town Centres' of the policy to read:</i></p> <p>k) <u>Supporting the creation of new Provide up to 900 sqm comparison goods retail floorspace, 500 sqm convenience goods retail floorspace, 100 sqm café and restaurant floorspace, and 100 sqm of drinking establishment floorspace. This should be directed toward within Preston Road and Kenton town centres providing that they are of an appropriate scale, to support their local function by 2028</u></p>	Provide clarity on strategic housing delivery numbers across the Places, reflect new capacity for BNWGA1, reflect the Retail and Leisure Needs study (EB_E_06), social infrastructure needs, changes to Use Class Order and align terminology with national policy as sought by Sport England.	Yes. This regards amendments to criteria D and F.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>l) Managing the likely overall reduction in length of the Preston Road and Kenton Town Centres</p> <p><i>Amend 'Community and Cultural Facilities' of the policy to read:</i></p> <p>m) Protecting and enhancing playing pitch field provision at Northwick Park, JFS School, Claremont High School, John Billam Playing Fields and Tenterden Sports Ground</p> <p>n) Encouraging community use Bryon Court Primary School's sports facility</p> <p><u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at</u> As part of the development within the Northwick Park Growth Area where the following improvements to community and cultural facilities should be achieved:</p> <p>o) Redeveloped and/or enhanced university hospital</p> <p>p) Redeveloped and/or enhanced university facilities</p> <p>q) Enhancements to Northwick Park Sports Pavilion</p> <p>r) Improved setting of and better integration of open space within the site to Northwick Park</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM41	5.4 North West	BNWGA1A, after page 140	<p><i>Insert new policy after para 5.4.43 to read:</i></p> <p><u>Policy BNWGA1A Northwick Park Growth Area</u> <u>The Northwick Park site will undergo major regeneration, making the best use of land in this highly sustainable location. This will provide a mix of uses, helping to create a self-sustaining community with a sense of place, including around 1,900 new homes (net addition around 1,600 homes). Development will maximise the delivery of affordable housing, and will see the existing key workers rehoused on site in more suitable and modern dwellings. Delivery will include a high proportion of family dwellings in addition to purpose built student accommodation in association with the on-site university facilities.</u> <u>Although subject to transformational change, the scale of development will need to respond positively to its surrounding context, particularly with regards to building heights. Development will integrate strongly with the adjacent Metropolitan Open Land, providing green fingers which help to bring the park into the development.</u> <u>Funding generated as a result of the development will be reinvested into the existing on-site infrastructure, including the Northwick Park Hospital, and the University</u></p>	New Growth Area policy and justification text to make consistent with how growth areas are addressed in the Plan.	Yes. New policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>of Westminster Harrow campus. This will serve to enhance existing facilities through renewal, and the addition of complementary uses such as new medical, community and sporting facilities. Access to the site will be improved, through a new Watford Road junction and the adjacent Northwick Park London Underground station being made more prominent and accessible to all users. Supporting infrastructure associated with new housing development will be drawn up in a forthcoming masterplan, and as a minimum will include:</u></p> <ul style="list-style-type: none"> • <u>A new flexible retail offer adjacent to Northwick Park station which will serve to meet local needs;</u> • <u>A new nursery capable of meeting existing needs, and those arising from new development;</u> • <u>A range of multi-purpose green spaces which seek to enhance the biodiversity of the surrounding area whilst providing new play space for children, including 2 new 0.2ha pocket parks;</u> • <u>Improvements to site accessibility, prioritising funding toward the most sustainable modes of transport;</u> • <u>On site combined heat and power centre which will provide a network for surrounding major development,</u> 		

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			<p style="text-align: center;"><u>including potentially those at Harrow-on-the-Hill;</u></p> <ul style="list-style-type: none"> • <u>And enhancements to existing on-site infrastructure which serves the wider area and that of Greater London.</u> <p>5.4.44 <u>The Northwick Park Growth Area is coming forward under the Governments One Public Estate (OPE) scheme, via the Northwick Park Partnership which includes all landowners, including the Council, Network Homes, National Health Service (HNS), and the University of Westminster. Together under the OPE scheme, the site will see the greater utilisation of land for residential development. This will help support the further delivery of essential large scale on-site infrastructures, including those which support and enhance the hospital and university functions.</u></p> <p>5.4.45 <u>The site is well connected, being adjacent to a range of public transport facilities, achieving a peak PTAL rating of 6a to 2031. This includes immediate proximity to Northwick Park LUL which includes the Metropolitan line to central London, Watford and west London, and Kenton LUL (a 5 minute walk) which includes the Bakerloo and Overground lines. There are also a number of buses which pass through the site, providing access in and around the local</u></p>		

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			<p><u>residential areas and serve access to the hospital.</u></p> <p>5.4.46 <u>The site is also adjacent to a significant amount of green infrastructure, including Northwick Park Metropolitan Open Land, Ducker Pool, Northwick Park golf course, and Harrow School playing fields. These areas include a number of Sites of Importance for Nature Conservation (SINC), and provide the opportunity to enhance these areas for both nature and recreation harmoniously.</u></p> <p>5.4.47 <u>The site is within close proximity to Kenton town centre which will enable residents to meet their wider needs. The site is somewhat detached from this area, and should therefore have on-site provision which will better enable occupants to meet their day-to-day needs using sustainable transport modes. The range of needs addressed on site will need to reflect the scale of development, and the types of residents (such as families and students), which are likely to occupy the site as a result of the housing delivered and its location.</u></p> <p>5.4.48 <u>Development will need to have strong consideration of development in the adjacent London Borough of Harrow. In particular, this will involve the potential linkages with the major development generated within the Harrow and Wealdstone Opportunity Area to the north, which has been identified in the</u></p>		

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			<p><u>London Plan as having the potential to deliver 5,000 new homes, and 1,000 new jobs.</u></p> <p><u>Specifically, development of any on-site energy centre will need to assess the potential for connection with this opportunity area.</u></p>		
MM42	5.4 North West	BNWGA1, page 142	<p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Growth Area - the site has been allocated for mixed used development. including a small amount of commercial floorspace and Additional residential development to enable upgrades/ refurbishment to the existing and retained Northwick Park Hospital and University of Westminster facilities. A replacement sports pavilion, small amount of commercial floorspace, and possibly new small-scale non-acute medical facilities to also be provided on-site.</p> <p>Indicative Capacity Capacity for circa 3,600 1,920 units, of which 2,600 1,585 net additional, development capacity will be better identified through a more detailed masterplan process.</p> <p>Timeframe for Delivery 10-5 Years: 650 218 (net 390) 5-10 Years: 1950 (net 910) 1,702 (1,367 net) 10+ Years:</p>	<p>To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.</p> <p>Update with latest planning history, revise position on previously proposed MOL land swap, strengthen ball stop mitigation requirement, clarify reservoir flooding risk and make reference to neighbouring borough protected views.</p>	Yes. Amended site capacity. Reference to impact protected views, and removal of MOL land swap reference.

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			<p>Description of Existing Site The site is located off Watford Road close to the boundary with the London Borough of Harrow. It is formed of five main areas: Northwick Park District Park, Northwick Park Hospital, Northwick Park Tube Station, Northwick Park Hospital Residential Accommodation and the University of Westminster. Within the site is a part of the one-way road system (also referred to as a 'ring road') that comes off of Watford Road, the main vehicular access for the site. Adjoining the northern boundary of the site is the Northwick Park underground station and tracks.</p> <p><u>The site consists of a mixed building stock of generally low quality, and is dominated by hospital buildings which range up to 8 storeys in height. The residential buildings on site provide accommodation for key workers and students.</u></p> <p>Northwick Park Station is a small, suburban station which has two platforms. The platforms are above the level of the surrounding area, and can be accessed by a flight of stairs from the ticket hall. The pedestrian connection from the station to Northwick Park is through a narrow tunnel. Access to Northwick Avenue is relatively open from the ticket hall, past a small shop.</p> <p>Northwick Park Hospital residential accommodation forms the eastern, and part of the southern part of the Growth Area. It consists of a number of affordable</p>		

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			<p>homes provided by Network Homes, some occupied by hospital employees. These are terrace homes and flats, predominantly 2 to 4 storeys. All housing is set back from the road behind either grass verges, hard landscaping or car parking spaces.</p> <p>Northwick Park Hospital Campus consists of a number of buildings varying in height between two and eight storeys, mixed in quality and age. Large portions of the hospital campus are dedicated to at grade car parks. A multi-storey is located in the west. Northwick Park hospital provides a full range of services, which includes neurology, cardiology and elderly care medicine. It also has a 24/7 A&E service and Urgent Care Centre. It is one of the eight Hyper Acute Stroke Units within London. There are a number of trees located along the eastern boundary which provide a visual screen to Northwick Park.</p> <p>University of Westminster comprises a number of buildings forms the western part of the Growth Area. Between these there are some areas of open/communal space. Halls of residence are located within its northern part with an associated green space, not currently publicly accessible. This green space has a variation in site levels and a number of trees. Trees line the southern boundary of the university site, acting as a visual break between it and the Northwick Park Hospital.</p>		

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			<p>Northwick Park sports pavilion provides changing rooms and facilities to support recreation on the park. The facility is tired, needing significant investment to enhance its quality to allow the sports pitches to be used to their potential.</p> <p>Ownership The London Borough of Brent, London North West University Healthcare NHS Trust, the University of Westminster and Network Homes are the key landowners, <u>who come together to form the Northwick Park Partnership which will develop the site under the</u> They have committed to work in partnership through a memorandum of understanding to promote the redevelopment of land at Northwick Park in a comprehensive manner through joint working as part of the One Public Estate programme: <u>Transport for London own Northwick Park station and adjacent railway land.</u></p> <p>Relevant Planning History There have been numerous applications for the hospital site including new buildings, extensions, creation of multi-storey car park, ancillary services/infrastructure and facilities to support the functioning of the hospital.</p> <p><u>Applications for redevelopment of the site under the Northwick Park Partnership include:</u> <u>Permission (19/4272) has been granted for the 'Erection of a multi-storey car park on 5 levels for</u></p>		

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			<p><u>staff only, a separate plant/energy facility and associated works to access road at Northwick Park Hospital'</u></p> <p><u>Permission (20/0677) has been granted for 'Full planning permission for junction improvement works to the A404 (Watford Road), and the widening of the existing Northwick Park Hospital spine road to allow two-way traffic; pedestrian and cycle improvements and associated landscaping and public realm works, and associated changes to access, and subject to a Deed of Agreement dated 4 December 2020 under Section 106 of the Town and Country Planning Act 1990, as amended'</u></p> <p><u>Permission (20/0701) has been granted for 'Full planning permission for demolition of existing buildings and structures on the site, all site preparation works for a residential led mixed-use development comprising 654 new homes, associated car and cycle spaces, a replacement nursery, retail space, associated highways improvements, open space, hard and soft landscaping and public realm works.</u></p> <p>PTAL Rating The site has a mixed PTAL rating. Around the University of Westminster campus, the PTAL ranges from 4 to 5. It then decreases to PTAL 3 and 4 around the Northwick Park Hospital, dropping to 2 at Northwick Park Hospital</p>		

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			<p>Residential Accommodation and Northwick Park sports pavilion: <u>2-5 (current), 2-6a (2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • Adjoining the Growth Area to the east and south is Northwick Park. Designated as Metropolitan Open Land (MOL), which it is afforded the same protection as Green Belt in Policy G3 of the London Plan. Located within the boundary of Northwick Park is a sports pavilion. It is proposed that the sports pavilion is relocated, possibly to create an active frontage between the station and hospital, but the location could vary. This will also create a more open feeling across the park. Any MOL land swap as part of the relocation of the sports pavilion should ensure that there is no net loss of MOL area. The value of the land designated as MOL should also be improved, having regard to all criteria in Part B of London Plan Policy G3. • London Plan Policy H10 does not allow loss of existing affordable housing unless replaced by equivalent or better quality accommodation that is of equivalent floorspace and price to occupiers. • Policy H5 requires public sector land development to deliver at least 50 per cent affordable housing. • There is potential for some tall buildings, subject to being a high quality design. These should respond to the height of the existing hospital buildings, stepping down towards the MOL and areas to the 		

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			<p>north. Consideration should also be given to impact on the locally protected views as identified in the Harrow Local Plans <u>of Harrow (Country Park at Wood Farm setting corridor) and Barnet (Golders Hill Park toward Harrow on the Hill)</u>.</p> <p>The appropriate height, extent and location of buildings will be identified within a masterplan for the site. Consideration will need to be given to the site's location next to MOL to ensure that there is no inappropriate impact on its setting. Part of the site also falls within the Ministry of Defence (MOD) safeguarding zone for RAF Northolt, in which the MOD will need to be consulted if development is over a certain height – 45.7m for development that occurs within the boundaries of the University of Westminster Campus and the majority of the hospital campus, and 91.4m for the land owned by Network Homes which includes the hospital's eastern car parks and residential accommodation.</p> <ul style="list-style-type: none"> • Furthermore, there is an area of The green space located to the rear of the student accommodation, which has an open space designation. Whilst it might be appropriate through the masterplanning and development process to relocate or disaggregate this open space, overall no <u>of open space</u> will be acceptable. This will be in addition to satisfying the urban greening requirements and providing sufficient children's play space, in line with London Plan policies G5 and S4. 		

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			<ul style="list-style-type: none"> • A ball strike assessment will <u>be required</u> and any necessary ball stop mitigation implemented prior to the development's impact to ensure that new development does not compromise the role of the MOL in terms of sports provision. • Running adjacent to the site's southern boundary is the Capital Ring leisure route. Development should not impact upon the functionality of the adjacent Capital Ring, and should seek its enhancement wherever possible. • Adjoining the site to the south west is Ducker Pool, a Site of Importance for Nature Conservation (SINC) (Grade I), also subject to a group Tree Preservation Order. The Growth Area's increase in residents could add to its recreational use as a nature conservation asset. Mitigation measures to address potential adverse impacts should be identified as part of the masterplanning process and ideally improvements to biodiversity implemented to enhance its SINC status. Impacts of development upon the SINC should be mitigated, with enhancements to its biodiversity value sought, including consideration toward its recreational use as a nature conservation asset. • The western part of the site is within an Air Quality Management Area. As such as a Growth Area development should be air quality positive. • Vehicular access to the site is from Watford Road. This is often congested with traffic moving between Harrow and Wembley areas. Development should 		

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			<p>not exacerbate this the congestion on Watford Road, and ideally new junction solutions will improve it.</p> <ul style="list-style-type: none"> • Within the site is a 'ring road'. This provides emergency services access to the A&E department. Development must ensure satisfactory vehicle (including emergency) movement is maintained. • South Kenton has poor pedestrian access to the site. Furthermore, Northwick Park station's access is via a narrow brick tunnel. <u>Pedestrian access to the site from South Kenton in particular should be enhanced, including from Northwick Park Station which will need</u> No step free access is currently available to <u>all</u> platforms. Development should seek to address these issues. • An interchange incorporating a suitable bus turning point, stand and associated driver facilities will need to be incorporated into the development. This will <u>to</u> improve the connection between the underground and buses and potentially transfer bus routes from the surrounding road network north of Northwick Park Station. • None of the site is within Flood Zone 3 for fluvial flooding. Parts of the site are however in <u>surface water flood zone</u> 3 for surface water flooding, the majority being highway land. In the south of the site, flooding from <u>potential</u> reservoirs failure exists. Some northern parts are susceptible to sewer flooding. More detailed assessment will be required through a site specific flood risk assessment. 		

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			<p>Risks</p> <ul style="list-style-type: none"> • A number of infrastructure requirements are necessary to support the delivery of the scheme. The costs of these could result in delays to delivery. The site's access road needs improvements for which the site has been awarded a £9.9 million Housing Infrastructure Fund (subject to contract), which will assist with its delivery. Subsequent delivery will need to meet short deadlines. • Continued operation of hospital functions during construction phase. Prior to the redevelopment of operational land, existing uses will need to be decanted to other areas. Therefore, re-provision of these uses on other land (i.e. hospital facilities, staff car parks, student accommodation or Trust accommodation) will be needed, which places greater need on the phasing of this development to be considered carefully. requiring careful consideration of phasing. <p>Infrastructure Requirements</p> <p>Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site.</p> <ul style="list-style-type: none"> • Upgrades to the junction at Watford Road will be needed to support development at this site. • Improvements to the capacity of, and pedestrian accessibility to, Northwick Park Station. 		

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			<ul style="list-style-type: none"> Improved sports and leisure facilities as part of the MOL land swap, green infrastructure and public realm throughout the site. A site wide energy network. An infrastructure agreement will be drawn up and signed by all four key partners. Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to being required to meet additional demands created through the development. 		
MM43	5.4 North West	BNSA1, page 146	<p><i>Amend parts of the policy to read:</i></p> <p>Timeframe for Delivery 10-5 Years 56-10 Years 101+ Years <u>450</u><u>100</u> <u>50</u></p> <p>Ownership Private and small part public ownership</p> <p>PTAL Rating The sites PTAL rating ranges from 4-5; PTAL rating of 5 is in the northern region of the site, covering the majority of the supermarket building. <u>4-5 (current), 5-6a (2031 estimate)</u></p> <p>Planning Considerations</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs and consideration of impacts of railway.	No. Amendments for clarity, brevity, and consistency only.

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			<ul style="list-style-type: none"> • The site forms part of the primary frontage of Kenton Town Centre, and as an anchor the supermarket is a significant draw. As such its retention, or a replacement of equivalent size is sought. The supermarket's relationship to the town centre ideally needs to be greatly improved through the positioning of its entrance and creation of active frontage along its northern and eastern boundary. This will ensure it makes a stronger and wider contribution to the vitality and viability of Kenton Town Centre. • <u>If parking is provided it should be made publicly available and be designed to serve the wider town centre.</u> • The streetscape, particularly the mini-roundabout on Nash Way is an insensitive over-engineered solution that <u>to the north and east</u> provides a poor townscape and pedestrian environment: <u>and needs to be improved</u> this needs to be part of a development solution. • There is an area of undesignated green space to the east of the site. Improvements to this area of <u>the green space to the east of the site</u> should be sought as part of any redevelopment. • <u>Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.</u> • The location next to the West Coast Mainline/ Overground and Underground lines to the west will 		

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			<p>require appropriate mitigation to ensure occupants of any development are not adversely impacted by noise and vibration. The railway is also a designated wildlife corridor. Development should not adversely impact upon this. Urban greening elements should be included within the development to enhance and complement this feature.</p> <ul style="list-style-type: none"> • The site is susceptible to sewer and groundwater flooding. A small area of the north western corner is susceptible to surface water flooding. A flood risk assessment will need to be submitted which demonstrates how the development will mitigate against flood risk. • Part of the site is located within an Air Quality Management Area. Development will need to be air quality positive. • A transport assessment will be required to determine the impact that residential development may have on this site. <p>Design Principles</p> <ul style="list-style-type: none"> • The entrance to the store should have a greater focus on addressing Kenton town centre. • Active frontage should be created along the northern and eastern edges along Nash Way and Draycott Avenue. • The site's visibility from Kenton Road requires a high quality/ landmark design for the northern edge of the site. 		

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			<ul style="list-style-type: none"> • The general character of the surrounding residential area is 2 storeys. 3 storey buildings are located to the north along Kenton Road. The large site, together with its proximity to a town centre and public transport accessibility will allow for some greater height than existing of around 5 storeys in parts, subject to appropriate step down/relationships to homes along Draycott Avenue. • Development should incorporate green infrastructure, particularly adjacent to the wildlife corridor. This should enhance the natural and ecological value of this area but also help mitigate poor air quality. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • An appropriate amount of car parking spaces will need to be retained for the superstore. • Improved access arrangements/ public realm should be informed by design and access statement/ transport assessment. • Incorporation of green infrastructure on the site. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to being required to meet additional demands created through the development. 		

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MM44	5.5 South Place	Opportunities, page 152	<p><i>Amend second point in opportunities to read:</i></p> <ul style="list-style-type: none"> • Improve Stonebridge Park gateway through redevelopment of the <u>Argenta House/Wembley Point and Unisys/Bridge Park sites. Unisys/Bridge Park presents the potential for a comprehensive redevelopment to replace the existing redundant tall buildings next to the North Circular and provide a scale of enabling development to support provision of a modern leisure centre with swimming pool.</u> 	Additional text necessary for greater clarity	No. Amendment for clarity only.
MM45	5.5 South Place	BP5, page 154-155	<p><i>Amend part e) and part g) of 'Homes' of policy to read:</i></p> <ul style="list-style-type: none"> e) <u>A minimum of 4,900 additional homes in the period to 2041.</u> Church End Growth Area, <u>providing over 1,300 new homes,</u> will be extended to include adjoining industrial sites and a masterplan produced to guide its improvement to a mixed use neighbourhood. f) The final phases of Stonebridge Park will be completed. g) The Harlesden Neighbourhood Plan provides policies and guidance on sites for housing and mixed-use development in the Harlesden Neighbourhood Area. 	To make consistent with London (Policy HC5) and national policies. Provide clarity on status of creative industries strategic, housing delivery numbers across the Places, provide housing figure for designated neighbourhood plan areas, reflect the Retail and Leisure Needs study (EB_E_06), reflect social infrastructure as sought by CCG.	Yes. With regards to amendments to criteria E, G and H.

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			<p><u>A minimum 797 dwellings should be provided in the Harlesden Neighbourhood Plan Area in the period to 2041.</u></p> <p><i>Amend part h) of 'Town Centres' of policy to read:</i></p> <p>h) Harlesden town centre's retail and evening economy offer will be protected and enhanced. New convenience and In the period to 2028 provide up to 4,800sqm of net comparison retail floorspace, and 900sqm convenience foods retail floorspace. This will should be directed to <u>wards Church End and Harlesden town centres.</u></p> <p>i) Church End town centre will provide convenience retail for local communities, including a market.</p> <p><i>Amend part j), part k) and part l) of 'Employment and Skills' of policy to read:</i></p> <p>Supporting the local economy through:</p> <p>j) Co-location of employment industrial and residential uses at Church End Locally Significant Industrial Sites, subject to the requirements in policy BE2.</p>		

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			<p>k) Retaining and encouraging intensification of employment industrial uses at Brentfield Locally Significant Industrial Site.</p> <p>l) Supporting the research into a 'Creative Cluster' and establishment of a Creative Enterprise Zone within Quarters at Harlesden, in accordance with London Plan Policy HC5 'Supporting London's Culture and Creative Industries'. Within Creative Clusters Quarters proposals to redevelop local employment sites will be required to re-provide high quality affordable workspace on site in accordance with policy BE3.</p> <p><i>Add new part m)(i) and amend 'Community and Cultural Facilities' of policy to read:</i></p> <p><u>m)(i) Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities.</u></p> <p>m) A new high quality indoor leisure facility with swimming pool provision will be secured on the Unisys Bridge Park site.</p>		

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			<p>n) Protect playing pitch facilities at Tokyngton and Gibbons Recreation Ground.</p> <p>o) A new 6 form of entry secondary school and college will be secured on the Chancel House site.</p> <p>p) A new space within Church End Growth Area to serve as an employment, community and health hub. <u>Through masterplanned development within the Church End Growth Area, built space accommodating workspace, a multi-use community centre, and a primary care health centre (subject to needs assessed in collaboration with the borough Clinical Commissioning Group) will be secured.</u></p>		
MM46	5.5 South Place	5.5.21, page 157	<p><i>Amend last sentence to read:</i></p> <p>Increased population will give rise to the need for a <u>multi-use community centre and health hub</u> hub <u>a primary care health centre (subject to needs assessed in collaboration with the borough Clinical Commissioning Group)</u> in Church End Growth Area.</p>	Necessary to ensure text is consistent with policy BP5	No, amendment for consistency only.
MM47	5.5 South Place	BSGA1, pg. 159	<p><i>Amend second paragraph of policy to read:</i></p> <p>The redevelopment of industrial sites for co-location will secure investment in new</p>	Consistency with the London Plan, Local Plan policy BP5 and the	Yes. Increased housing target.

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			<p>employment employment industrial floorspace and improve environmental quality.</p> <p><i>Amend fourth paragraph of policy to read:</i></p> <p>The West London Orbital will improve the connectivity of Church End to the wider borough and Central London.</p> <p>Church End Growth Area will deliver 1,040 over 1300 new homes to 2041, supported by social and physical infrastructure to include:</p> <ul style="list-style-type: none"> • A new space to serve as workspace employment, multi-use community centre, and health hub a primary care health centre. • A new 6 form of entry secondary school and college on the Chancel House site • New play facilities within developments • Enhancements to Church End Open Space and Willesden Jewish Cemetery • <u>Increased greening through tree planting and the creation of new open space within site allocations</u> 	updated Housing Trajectory.	
MM48	5.5 South Place	BSSA1, page 162 - 163	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Mixed-use residential, employment industrial and supporting community facilities</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BSGA1, Policy BE2 and Policy BE3) and	Yes. Amendments to site housing capacity, minimum amount of industrial floorspace re-provision required.

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			<p>Indicative Capacity: 380414</p> <p>Timeframe for Delivery: 0-5 1-5 Years 34 5-10 6-10 Years 120 10+ 11+ Years 380260</p> <p>PTAL Rating: 3/4 3-4 (current and 2031 estimate). West London Orbital could uplift by 1.</p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> Whilst the west of the site was in 2011 allocated for mixed-use light industrial/managed affordable workspace and residential, the <u>The premises west of Dalmeyer Road are a local employment site, and the east of this site all of this allocation is now designated as a Locally Significant Industrial Site (LSIS).</u> Redevelopment will be consistent with London Plan policy E7 and Brent Local Plan policy BE2 and BE3. It will be subject to a masterplan-led approach, demonstrating comprehensive development will result in a net increase in employment <u>overall industrial floorspace totalling the maximum viable that can be achieved from the existing local employment site,</u> 	<p>London Plan policies, incorporate essential infrastructure needs and industrial re-provision and make clear the principle of masterplan.</p>	

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			<p><u>and from the LSIS a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater.</u></p> <ul style="list-style-type: none"> • <u>Developments of non-industrial uses will not be permitted until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace across the site. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • <u>If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered.</u> • It will result in development of a high quality design that effectively manages and mitigates any potential conflict between uses and a high standard of amenity achieved. • Given the land ownership tThere is potential for the Asiatic Carpets site to come forward as a first phase. This would be subject to it being demonstrated it would not prejudice 		

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			<p>the delivery of a comprehensive masterplan for the site allocation or the operation of Cygnus Business Park. It would need to be demonstrated the Asiatic Carpets site in isolation would meet policy requirements, including an increase in industrial floorspace.</p> <ul style="list-style-type: none"> • The site is bounded by soft landscaping to the west, including a number of mature trees. • The site itself comprises expanses of impermeable surfaces, which contributes to surface water flooding. • There are areas surrounding the warehouse within flood zone 3a due to surface water flooding. A Flood Risk Assessment and appropriate mitigation will be required. • As with the majority of Brent the site is located wWithin an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive. • A health, community and enterprise hub will be needed to meet the needs of the population as set out in policy BSGA1 Church End Growth Area. • The site has a PTAL of 3-4, but this could increase on implementation of the West London Orbital, giving the potential for car 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>free development. The closest station is Neasden Station less than 400m away, and regular bus services stop on the site boundary.</p> <ul style="list-style-type: none"> The south west corner of the site lies within an Area of Archaeological Interest. Any proposals at this location should be accompanied by the appropriate assessments in order to identify the archaeological potential and the significance of the likely archaeological impact. <p>Design Principles:</p> <ul style="list-style-type: none"> Development must be subject to a comprehensive masterplan-led approach. Piecemeal development which would prejudice the delivery of a wider masterplan will be refused. The masterplan must demonstrate a Demonstration of high quality of design and amenity, and that any potential conflicts between uses can be mitigated and a high standard of amenity achieved. Development should on its edges successfully relate to the scale of existing residential development to the north and west, with a setback and active frontage 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>introduced to the west facing Chapel Close.</u></p> <ul style="list-style-type: none"> • withAppropriate heights and density will be determined through a-masterplanning exercise. • The warehouse currently presents a blank façade to housing on Chapel Close. To be sensitive to the adjoining residential, development should be set back from Chapel Close and provide an active frontage. • Mature trees <u>to the west</u> should be retained and soft landscaping reinforced. • Sustainable Drainage Systems will be required to help mitigate surface water flooding. <p>Infrastructure Requirements:</p> <ul style="list-style-type: none"> • The location of the <u>primary</u> health <u>care centre</u>, community <u>centre</u> and <u>workspace as set out in BSGA1</u> will be determined through the masterplanning exercise. • Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process.</p> <p>Justification</p> <ul style="list-style-type: none"> • The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area further and its connectivity to Central London. • Currently the site is underutilised. Given its accessibility and proximity to facilities at Church End Town Centre it is a sustainable location for higher density <u>mixed-use development that provides for new residential dwellings and appropriate amounts of high quality industrial space to meet needs.</u> • For development to be in conformity with London Plan policy, including the requirement for Brent to provide increased employment capacity mixed-use development will be subject to a net increase in employment floorspace in addition to other criteria outlined in E7, BE2 and BE3. 		
MM49	5.5 South Place	BSSA2, page 164-165	<i>Amend parts of policy to read:</i>	To increase brevity and make consistent approach	Yes. The industrial floorspace minimum

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Allocated Use: Housing, employment industrial and supporting community facilities</p> <p>Indicative Capacity:</p> <p>Timeframe for Delivery: 0-5 1-5 Years 5-10 6-10 Years 10+ 11+ Years 160</p> <p>PTAL Rating: 2/42-4 (current and 2031 estimate). West London Orbital could uplift by 1</p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> Designated a Locally Significant Industrial Site, consistent with London Plan policy E7 and Brent Local Plan policy BE2 redevelopment will be subject to a masterplan-led approach. This will demonstrateing comprehensive development will result in a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater. a net increase in employment floorspace, development of a high quality design and that any potential conflict between uses can 	<p>across the housing trajectory, Local Plan (Policy BSGA1) and London Plan policies, incorporate essential infrastructure needs and industrial re-provision and make clear the principle of masterplan.</p>	<p>requirements set out are still likely to result in an increase in industrial floorspace.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>be managed and mitigated and a high standard of amenity achieved.</p> <ul style="list-style-type: none"> • <u>Developments of non-industrial uses will not be permitted on the LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • <u>If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered.</u> • The Jewish Cemetery to the south of the site is Grade II Listed. • The north west corner of the site lies within an Area of Archaeological Interest. Any proposals at this location should be accompanied by the appropriate assessments in order to identify the archaeological potential and the significance of the likely archaeological impact. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • As with the majority of Brent the site is located wWithin an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive. • The site itself comprises expanses of impermeable surfaces, which contributes to surface water flooding. Parts of the road network are within flood zone 3a due to surface water flooding. A Flood Risk Assessment and appropriate mitigation will be required. • A health, community and enterprise hub will be needed to meet the needs of the population as set out in policy BSGA1 Church End Growth Area. • The site has a PTAL of 2-4, but this could increase on implementation of the West London Orbital, giving the potential for car free development. The closest stations are Dollis Hill and Neasden Stations less than 500m away, and regular bus services run from the High Road. • A number of mature trees are located along Cobbold Road and in the B&M supermarket car park. <p>Design Principles:</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Development must be subject to a comprehensive masterplan led approach. • Piecemeal development which would prejudice the delivery of a wider masterplan will be refused. • The masterplan must demonstrate a Demonstration of high quality of design and amenity, and that any potential conflicts between uses can be mitigated and a high standard of amenity achieved. • Development should successfully relate to the scale of existing residential development to the east, <u>with a set back and active frontage introduced where there is currently a blank wall, in Cobbold Road.</u> • Appropriate heights and density will be determined through a masterplanning exercise. • Development should be sensitive to the setting of the Grade II Listed Jewish Cemetery. Heights will need to be informed by an assessment of impact on views from the cemetery. • The development currently presents a blank wall along Cobbold Road. To be sensitive to the adjoining housing, development should 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>be set back from Cobbold Road and provide an active frontage.</p> <ul style="list-style-type: none"> • <u>Mature trees located along Cobbold Road and in the B&M supermarket car park should where possible be retained and soft landscaping reinforced.</u> • <u>Sustainable Drainage Systems will be required to help mitigate surface water flooding.</u> <p>Infrastructure Requirements:</p> <ul style="list-style-type: none"> • The location of the <u>primary health care centre, community centre and workspace as set out in BSGA1</u> will be determined through the masterplanning exercise. • Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process. <p>Justification</p> <ul style="list-style-type: none"> • The site is located in a high PTAL location. The West London Orbital will further 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>improve the PTAL of this area further and its connectivity to Central London.</p> <ul style="list-style-type: none"> • Currently the site is underutilised. Given its accessibility and proximity to facilities at Church End Town Centre it is a sustainable location for higher density mixed-use development that provides for new residential dwellings and appropriate amounts of high quality industrial space to meet needs. • For development to be in conformity with London Plan policy, including the requirement for Brent to provide increased employment capacity mixed-use development will be subject to a net increase in employment floorspace in addition to other criteria outlined in E7, and BE2. 		
MM50	5.5 South Place	BSSA3, page 166-167	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery: 0-5 1-5 Years 99 5-10 6-10 Years 10+ 11+ Years 96</p> <p>Address: Church Road, NW10 2ET9NP</p> <p>PTAL Rating:</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE8 and Policy BSGA1) and London Plan policies, incorporate essential infrastructure needs and address flood risk.	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>2/3 2-3 (current and 2031 estimate). West London Orbital could uplift by 1</p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> • The parade is designated secondary frontage. Redevelopment will need to retain active frontages at ground floor. As secondary frontage, there is flexibility on the range of uses which could include retail, leisure, community and employment. • Workspace will be sought as part of any redevelopment. • <u>Provision of a new market should be in accordance with the requirements of policy BE8 – Markets and Car Boot Sales.</u> • The parade includes a dentist which is needed to meet local healthcare needs. Space for a dentist will need to be retained unless re-provision in suitable alternative premises within walking distance occurs. • A health, community and enterprise hub will be needed to meet the demands of the new population as set out in policy BSGA1 Church End Growth Area. • Church Road and Eric Road are within flood zone 3a due to surface water flooding. Development should seek to reduce surface water runoff by maximising planting and 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>through SuDS. <u>A Flood Risk Assessment and appropriate mitigation will be required.</u></p> <ul style="list-style-type: none"> • As with the majority of Brent the site is located wWithin an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive. • The site has a PTAL of 2/3, but this could increase on implementation of the West London Orbital. The closest stations are Dollis Hill and Neasden Stations less than 500m away, and regular bus services run from the High Road. • St Mary's Church to the north is a Grade II Listed building. The church hall and cottages are locally listed. • The site lies within an Area Priority Area and the eastern corner of the site within a Site of Archaeological of Importance. Any proposals at this location should be accompanied by the appropriate assessments in order to identify the archaeological potential and the significance of the likely archaeological impact. <p>Design Principles:</p> <ul style="list-style-type: none"> • Development should create an active frontage on to Church Road. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Building heights should complement the southern parade which is predominantly 3 storeys in height and adjacent developments such as Canaletto Court which is 6 storeys. There is potential for higher development of up to 6 storeys at corner sites. • Given Church End Town Centres heavily urbanised character the open space to the west of the parade should be enhanced and planting increased there and elsewhere through measures such as reducing surface water through SuDS. • Currently buildings turn their back on Church End Open Space and St Mary's Church. There is an opportunity to create a stronger frontage with views towards the church. • Development should be sympathetic to the setting of Grade II listed St Mary's Church and the associated locally listed buildings. <p>Infrastructure Requirements:</p> <ul style="list-style-type: none"> • The location of the primary health care centre, community centre and workspace as set out in BSGA1 will be determined through the masterplanning exercise <p>Justification</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area and its connectivity to Central London. Currently the site is underutilised, and given its accessibility it is a sustainable location for higher density development. A new market, commercial space and housing will help to revitalise the centre, as will environmental improvement. 		
MM51	5.5 South Place	BSSA4, page 168-169	<p>Allocated Use: Mixed-use housing, employment industrial and supporting community facilities</p> <p>Indicative Capacity: 200 300</p> <p>Timeframe for Delivery: 0-5 1-5 Years 5-10 6-10 Years 200 10+ 11+ Years 200 100</p> <p>PTAL Rating: 4/5 (current and 2031 estimate)</p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> The site is a designated Locally Significant Industrial Site. Consistent with London Plan policy E7 and Brent Local Plan policy BE2 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BSGA1) and London Plan policies, incorporate essential infrastructure needs, industrial re-provision, and make clear the principle of masterplan.	Yes. Amendments to site capacity. The industrial floorspace minimum requirements set out are still likely to result in an increase in industrial floorspace.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>redevelopment will be subject to a masterplan-led approach, demonstrating comprehensive development will result in a <u>minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater.</u> a net increase in employment floorspace, development of a high quality design and that any potential conflict between uses can be managed and mitigated and a high standard of amenity achieved.</p> <ul style="list-style-type: none"> • <u>Developments of non-industrial uses will not be permitted in the LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • <u>If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered.</u> • The site itself comprises includes expanses of impermeable surfaces and lacks soft 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>landscaping, which contributes to surface water flooding. Parts of the road network and open storage are within flood zone 3a due to surface water flooding. A Flood Risk Assessment and appropriate mitigation will be required.</p> <ul style="list-style-type: none"> • As with the majority of Brent the site is located wWithin an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive. • A health, community and enterprise hub will be needed to meet the needs of the population as set out in policy BSGA1 Church End Growth Area. • The site has a PTAL of 4/ to to 5, but this could increase on implementation of the West London Orbital, giving the potential for car free development. Dollis Hill Station is less than 300m to the east, and Neasden Station less than 600m to the north. Regular bus services run from the High Road and Dudden Hill Lane. <p>Design Principles:</p> <ul style="list-style-type: none"> • Development must be subject to a comprehensive masterplan-led approach. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Piecemeal development which would prejudice the delivery of a wider masterplan will be refused. • The masterplan must demonstrate a Demonstration of high quality of design and amenity, and that any potential conflicts between uses can be mitigated and a high standard of amenity achieved. • The site is bounded by two storey housing. Development will need to consider be sensitive to impacting on the amenity of surrounding 2-storey properties and successfully relate to their scale. Appropriate heights and density will be determined through a masterplanning exercise. • The development currently presents a blank frontage to Colin Road and Dudden Hill Lane, whilst vehicle repair businesses utilise Colin Road and contribute to a cluttered environment. There is an opportunity for development to significantly improve the quality of the environment by creating an active frontages to Colin Road and Dudden Hill Lane. • Development should increase soft landscaping and increase tree planting along Dudden Hill Lane. <p>Infrastructure Requirements:</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • The location of the primary health care centre, community centre and workspace as set out in BSGA1 will be determined through the masterplanning exercise. • Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process. <p>Justification</p> <ul style="list-style-type: none"> • The site is currently of a low quality townscape. It presents a blank frontage on to Dudden Hill Lane which makes the area feel unsafe. Whilst garages to the south contribute to street clutter and congestion on Colin Road. There is an opportunity to improve the quality of the environment in this location through development. • The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area and its connectivity to Central London. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Currently the site is underutilised. Given its accessibility and proximity to facilities at Church End Town Centre it is a sustainable location for higher density <u>mixed-use</u> development <u>that provides for new residential dwellings and appropriate amounts of high quality industrial space to meet needs.</u> • For development to be in conformity with London Plan policy, including the requirement for Brent to provide increased employment capacity mixed-use development will be subject to a net increase in employment floorspace in addition to other criteria outlined in E7, and BE2. 		
MM52	5.5 South Place	BSSA5, page 170-171	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Re-provision of bus depot and public house or employment <u>industrial</u> uses with residential above.</p> <p>Timeframe for Delivery 0-5 <u>1-5</u> Years 56 5-10 <u>6-10</u> Years 110+ <u>10+ 11+ Years</u></p> <p>Ownership:</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3, Policy BHC1 and Policy BGI2) and London Plan policies, incorporate essential infrastructure needs, address impacts on existing transport infrastructure, provide	Yes. Reference to water infrastructure requirements.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Public/Private</p> <p>PTAL Rating: 5 to 6 (current and 2031 estimate)</p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> • <u>An operational bus garage of equivalent capacity needs to be retained/re-provided on the site, unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.</u> • <u>As a Local Employment Site maximum re-provision of floorspace to include research and development, light industrial and storage and distribution will be required if there is no need for a bus depot on site.</u> • The site itself includes an Edwardian entrance incorporating a war memorial and The Crown Public House (335 High Road) which is a non-designated heritage asset. To the west of the site is the Grade II Listed Willesden Jewish Cemetery, This has recently been awarded Heritage Lottery Funding to restore key features and open a visitor's centre. There are views from the site into the Jewish Cemetery from upper floors. 	<p>clarity on alternatives to bus depot.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>The locally listed Willesden Seventh-Day Adventist Church is located to the north east of the site. There are also a number of other non-designated heritage assets in the surrounding area which make a positive contribution to local character, including Willesden Deeper Life Christian Centre (344 High Road), a single-storey ragstone chapel, and No.8 Public House (305 High Road).</p> <ul style="list-style-type: none"> • Policy BHC5 of the Local Plan protects public houses and would apply to The Crown Public House. Should the loss of the public house use be justified under policy BHC5, the preferred alternative use is employment light industrial maker floorspace, with the potential for some residential above. This would contribute to the existing workspace cluster in the area and complement the town centre uses on the high road. • The site is accessible via Pound Lane and from the High Road via Churchmead Road. The site has high PTAL which means development should be car free. It is well served by public transport. Regular bus services operate from the High Road and Pound Lane, and Dollis Hill Tube Station on the Jubilee Line is less than a 10-minute walk away. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • As with the majority of Brent the site is located w Within an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Part of the site falls within flood zone 3a due to surface water flooding. A Flood Risk Assessment will be required. • There are four mature trees located along the northern and eastern boundary of the site. <p>Design Principles</p> <ul style="list-style-type: none"> • Development should respond to the predominant character of the area, which is two to four storeys in height, and Development should on it's the south edge should should successfully relate to the scale of existing adjacent two storey terraced housing to the south, whilst there are opportunities for taller elements fronting the High Road and Pound Lane. • <u>Demonstration of high quality of design and amenity, and that any</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>potential conflicts between uses can be mitigated.</u></p> <ul style="list-style-type: none"> Development should also take account of <u>Positively addressing the site's heritage assets including the locally listed Edwardian bus depot entrance incorporating a war memorial and The Crown Public House and those surrounding heritage assets including the Grade II listed Jewish cemetery, and the locally listed Willesden Seventh-Day Adventist Church, Willesden Deeper Life Christian Centre (344 High Road) and No.8 Public House (305 High Road) and</u> the effect on their special architectural and historic interest. A heritage statement will be <u>required.</u> necessary and although the site has potential for taller, well-designed buildings, this will need to take account of the setting of the listed cemetery as well as the general streetscene. The development should take influence from the positive characteristics of the surrounding buildings and structures. In particular, the retention and consideration of the Edwardian Bus Depot entrance, war memorial and The Crown Public House is encouraged. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>Tree planting along the northern and eastern boundary of the site should be retained and reinforced.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • No site specific infrastructure requirements, beyond retention of the bus depot and associated vehicular access. • <u>Thames Water have indicated that currently there are no significant concerns with regards to water supply or waste water capacity for this site. Nevertheless, liaison is encouraged with Thames Water prior to any application to identify whether any upgrades are required as a result of development.</u> <p>Justification</p> <ul style="list-style-type: none"> • The site is located in an area of high public transport accessibility with good access to local services, making it a sustainable location for residential development. • There is an opportunity to enhance the character of the area, including the setting of the Grade II listed cemetery and optimise the use of the site through a mixed-use development comprising 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>residential and a re-provided bus depot or a range of industrial uses.</p> <ul style="list-style-type: none"> • Crown Public House is a long-term vacant building which is in a poor state of repair and detracts from the streetscene. 		
MM53	5.5 South Place	BSSA6, page 172-173	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Residential, with potential for affordable workspace, supporting community and cultural uses and small scale retail.</p> <p>Indicative Capacity 540569</p> <p>Timeframe for Delivery 01-5 Years 440569 56-10 Years 400 110+ Years</p> <p>Planning History: Prior approval to convert Wembley Point to 439 residential units (18/3125) Prior approval Wembley Point (17/0729) Prior approval Wembley Point (16/4944) Planning applications permissions permissions to clad Wembley Point. (18/4535 & 17/3244)</p>	<p>To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies. Incorporate essential infrastructure needs, employment re-provision, clarity on need for modelling due to the flood risk on site and address impacts on existing transport infrastructure.</p> <p>Text on masterplan unnecessary as acceptable development can come forward on the two separate sites.</p>	Yes. Reference to new SFRA Level 2, and increased housing capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Planning application permission application to develop 130 residential units on Argenta House site. (18/4847)</p> <p>PTAL Rating 4 (<u>current and 2031 estimate</u>)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is directly adjacent to the North Circular Road, a major source of air and noise pollution. • As with the majority of Brent the site is Located within an Air Quality Management Area. As a minimum development is to be Air Quality Neutral. • Wembley Brook and River Brent are potential sources of flooding and the majority of the site is within Flood Zone 3- Part of the site is within <u>including extensive</u> flood zone 3b (functional floodplain). Development, other than water compatible uses, will not be acceptable within functional floodplain. <u>Any flood modelling from applicants which seeks to justify a revision to the functional floodplain boundary will need to be agreed by the Environment Agency.</u> • More vulnerable uses should be restricted to areas of lowest flood risk and on upper 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>floors. Ground floors should be designed to be resistant and resilient to flood risk. Basement dwellings will not be acceptable on the site. <u>Development must be informed by a detail Flood Risk Assessment and Drainage Strategy, reduce flood risk overall and not increase the risk of flooding on adjoining sites. Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u></p> <ul style="list-style-type: none"> • The area is heavily built up. Lack of landscaping, large expanses of car parking and the North Circular Road contribute to low permeability and accumulated surface water build up. • The railway trackside and Wembley Brook adjacent the site forms part of a wildlife corridor and Grade I Site of Importance for Nature Conservation. There is an opportunity to help reinforce the wildlife corridor through soft landscaping to the site. • The site has a PTAL of 4 being directly adjacent the Stonebridge Park Station and a bus stop. Car free development <u>should be the starting point for development</u> will be encouraged, subject to a Controlled Parking Zone being achieved. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Due to its current and historic industrial use there is potential for contamination and a preliminary risk assessment will be required, and if necessary site investigations. • The site <u>was until recently predominantly in employment use</u> contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit. The London Plan identifies Brent as a 'provide capacity' borough in terms of industrial employment floorspace and as <u>As</u> such an increase in <u>provision of some employment floorspace affordable workspace</u> will be sought <u>on site, as part of the potential uses associated with a new mixed use community.</u> • The site is adjacent to an existing local shopping parade at Harrow Road. Small scale complementary retail uses may be appropriate providing they support the vitality and viability of the existing <u>nearby parade at Harrow Road.</u> Given the scale of development community and cultural uses will be needed to serve the new community and promote social interaction. • The development will be heavily reliant on Stonebridge Park station which currently acts as an interchange for bus and rail travel. It has a poor public realm which needs to be 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>improved, <u>subject to agreement being reached between the Council and landowners.</u></p> <ul style="list-style-type: none"> • Site is of sufficient size to incorporate BH3 Build to Rent and BH8 Specialist Older People’s Housing policy requirements. <p>Design Principles</p> <ul style="list-style-type: none"> • The site is in a prominent location, highly visible from the North Circular and Stonebridge Park Station. Given its prominence Therefore, the highest architectural quality will be required. • <u>Development must mediate, in scale and layout, between the</u> A-cluster of taller buildings is located in this location, including the 7 storey Unisys buildings and 21 storey Wembley Point building, and the However, to the north the site is bounded by two-storey housing <u>to the north, and</u> The scale and layout must mediate between Wembley Point building and the surrounding low-rise buildings and mitigate any potential impacts. • It is considered that this area <u>The site is within a Tall Buildings Zone and</u> is suitable for tall buildings, subject to <u>achieving development integration</u> ong well with the surrounding context <u>and character, and</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>being of a high quality design and respecting local character.</p> <ul style="list-style-type: none"> • Development must be informed by a detail Flood Risk Assessment and Drainage Strategy. Development, other than water compatible uses, will not be acceptable within the functional flood plain. • Development elsewhere in the site will be subject to the Flood Risk Assessment demonstrating, through works to the Wembley Brook and other mitigation, development would be resistant and resilient to all relevant sources of flooding, reduce flood risk overall and not increase the risk of flooding on adjoining sites. • The Wembley Brook should become a feature which contributes to the character of the site and provides natural Sustainable Urban Drainage. Proposals should seek to naturalise the Wembley Brook to improve its ecological and landscape value whilst also providing sustainable urban drainage. • Tree planting and soft landscaping will be required to mitigate air quality impacts from the North Circular and increase permeability. • Development should create a strong pedestrian connection between Harrow Road and Stonebridge Park Station, through 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>active frontage and public realm enhancements.</p> <ul style="list-style-type: none"> • Should Argenta House and Wembley Point come forward separately, it will need to be demonstrated through a masterplan approach this will not prejudice comprehensive development and the achievement of all policy requirements. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Flood mitigation. • Improvements of the public realm/ interchange facilities at Stonebridge Park station and step-free access. • <u>The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought.</u> <p>Justification</p> <ul style="list-style-type: none"> • The site benefits from good public transport access with a PTAL rating of 4. • In its current state the sSite is of a poor environmental quality, with dated buildings. Redevelopment would improve the environmental quality of the area, help reduce flood risk and create an attractive gateway to the borough and Stonebridge. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Draft London Plan policy requires Brent to provide additional employment floorspace capacity. Consistent with this Brent's Local Plan policies allow redevelopment of Local Employment Sites such as Argenta House, subject to reprovision of employment floorspace as affordable workspace. An increase in employment floorspace will be sought. • The development will introduce a significant level of high density residential development to the area. As such supporting eCommunity and cultural facilities will be required as part of any development, to meet need and create opportunities for social interaction and integration. • The indicative capacity takes into account that the majority of the site is within functional floodplain and therefore not suitable for development. Should flood risk modelling approved by the Environment Agency result in changes to the extent of the functional floodplain, a higher level of development may be achievable. In such a scenario the design principles and policy considerations outlined would still apply. 		
MM54	5.5 South Place	BSSA7, page 175-176	<i>Amend parts of policy to read:</i>	To increase brevity and make consistent approach across the housing	Yes. Includes reference to new SFRA Level 2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Timeframe for Delivery: 01-5 Years 56-10 Years 275 110+ Years 230</p> <p>PTAL Rating: PTAL 3 and 4 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The provision of a new leisure centre on the site is required, to meet the need for indoor sports facilities in the borough, as set out in the Brent Indoor Sports and Leisure Needs Assessment. • Small scale commercial and community uses will be acceptable where they meet the needs of the new community. • The railway tracks to the south of the site are designated as a Wildlife Corridor and the trackside to the north of the tracks is a Grade I Site of Importance for Nature Conservation (SINC) (Harlesden to Wembley Central including Wembley Brook). Development of the site should seek to protect and enhance these sites. • There are numerous Trees on which align the front of the site and currently form the 	<p>trajectory, SFRA Level 2, Local Plan (Policy BD2 and Policy BT2) and London Plan policies. Incorporate essential infrastructure needs, industrial re-provision, Address public transport capacity and accessibility and make clear the principle of masterplan.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>perimeter of the leisure centre's car park, all of which should be retained if possible.</p> <ul style="list-style-type: none"> • As with the majority of Brent the site is located located within an Air Quality Management Area. The adjacent North Circular Road is a major source of air and noise pollution. As a minimum development is to be Air Quality Neutral. • The east section of the site, which is currently occupied by both the leisure centre and the former Sperry Univac building, was previously a bus station, and therefore has historical industrial use. In this case contamination Contamination testing should be undertaken along with any necessary remediation works. • The whole site site is designated as Flood Zone 3a (surface water). and Large expanses are designated as Flood Zone 3a (fluvial and tidal). The fluvial and tidal flooding concerns are are due to the proximity to Brent river and its tributary Wembley Brook. • This is further exacerbated by the low permeability of the area which is also why the area is considered a surface water flood risk. The area is heavily built up with the North Circular Road and its junction with the A404, Stonebridge Park Station and 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>numerous industrial areas all contributing to low permeability, and accumulated surface water build up.</p> <ul style="list-style-type: none"> • It must be demonstrated that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • With a PTAL of 3-4 4/3, the site is located within a 6-minute walk of Stonebridge Park Station, which is served by the overground and underground and within a 5-minute walk of 3 bus stops, each serviced by one bus. car free development will be encouraged, subject to a Controlled Parking Zone being achieved. • Site is of sufficient size to incorporate BH3 Build to Rent and BH8 Specialist Older People's Housing policy requirements. <p>Design Principles</p> <ul style="list-style-type: none"> • A cluster of taller buildings is located on the western edge of the site, including the 8 storey Unisys buildings and, on the other 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>side of the North Circular, the 21-storey Wembley Point building.</p> <ul style="list-style-type: none"> • <u>The site has been identified as part of a Tall Buildings Zone.</u> In this context higher density development of is appropriate, subject to being of high architectural quality, and providing a high standard of amenity, <u>and respecting local character.</u> • Development will need to successfully mediate between the taller elements and scale of the south eastern border where it adjoins 2 storey residential housing on First Drive. • The layout of development <u>must</u> will need to be informed by flood risk management and reduction, directing development to the areas at lower flood risk. • Incorporating the theme of flooding mitigation, the site's Landscaping <u>ing</u> should be enhanced, increasing greenery, and in the process, <u>permeability whilst reducing risk of flooding.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • <u>The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Improvements to the bus network may be required to increase PTAL and enable car free or car light residential development. • Sustainable Urban Drainage Systems (SUDS) and flood mitigation will be required informed by the Flood Risk Assessment and Drainage Strategy. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. <p>Justification</p> <ul style="list-style-type: none"> • The site benefits from good public transport access, with a PTAL rating of both 3 and 4. and has In its current state the site is of a poor environmental quality, with dated buildings and the long-term vacant Unisys buildings. • It contrasts with the attractive environment created elsewhere in Stonebridge through modern development. • Redevelopment would improve the environmental quality of the area and create 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>an attractive gateway to the borough and Stonebridge.</p> <ul style="list-style-type: none"> Comprehensive mixed-use development is needed to help facilitate a new leisure centre and to bring the Unisys buildings back in use. This site and the surrounding area would benefit greatly from redevelopment in terms of flood mitigation. 		
MM55	5.5 South Place	BSSA8, page 177	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Residential and employment industrial</p> <p>Comments: Consistent with policy BE3 an increase in employment the maximum viable amount of industrial floorspace will be sought as part of any redevelopment.</p>	Consistency with the London Plan and Local Plan Policy BE3.	Yes, it is likely due to viability considerations that less industrial floorspace will now be provided on site.
	5.5 South Place	BSSA9, page 177	<p><i>Amend 'comments' of the policy to read:</i></p> <p>Comments: Consistent with policy BE3 an increase in employment the maximum viable amount of industrial floorspace will be sought as part of any redevelopment. Development should also take account of the surrounding heritage assets and the effect on their special architectural and historic interest. A heritage statement will be</p>	Consistency with Local Plan Policy BE3.	Yes, it is likely due to viability considerations that less industrial floorspace will now be provided on site.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			necessary. The retention of the Willesden Seventh-Day Adventist Church building and the former constitutional club is encouraged.		
	5.5 South Place	BSSA13, page 177	<i>Amend parts of policy to read:</i> Indicative housing capacity: 15 26	Reflects minded to approve scheme.	Yes. Amendments to site capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
MM56	5.6 South East	BP6, page 184-185	<p><i>Amend part d) and add new part d) (i) to 'Homes' of the policy to read:</i></p> <p>e) <u>Minimum of 5,100 additional homes in the period to 2041, with an important component being</u> South Kilburn Growth Area, <u>which</u> will deliver approximately 3,400 <u>over 2,100</u> new high quality homes <u>(or, a minimum of 800 net additional homes once demolitions are taken into account)</u>, with a target of 50% affordable including social rented for existing secure tenants of South Kilburn <u>estate.</u></p> <p><u>d i) Deliver a minimum of 348 new homes in the Kilburn Neighbourhood Forum area in the period to 2041.</u></p> <p>f) Kilburn Square as part of a mixed-use development including re-provision of the market and a new public square</p> <p><i>Amend part j) of 'Town Centres' of the policy to read:</i></p> <p>i) Enhance and protect Kilburn Town Centre's evening economy and comparison retail offer, including the creation of a food and drink cluster</p>	To make consistent with London and national policies. Provide clarity on housing delivery numbers across the Places and provide housing figure for designated neighbourhood plan areas. Reflect the Retail and	Yes. This relates to criteria d, di, j, n, and li.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>around the Kiln Theatre. Redevelopment of Kilburn Square is to provide a new market, retail floorspace and public square to act as a focal point for the centre.</p> <p>j) <u>In the period to 2028 provide up to 7,200 sqm net comparison retail floorspace, to be directed to Kilburn town centre in the first instance. Provide up to 7,500 sqm net convenience retail floorspace, 600 sqm café and restaurant floorspace, and 300 sqm drinking establishment floorspace across the town centres of</u> Cricklewood, Willesden Green, Queen's Park and Kensal Rise. will provide convenience retail for local communities in addition to a restaurant and café offer. New convenience retail floorspace of over 500sqm will be in the first instance directed to Willesden Green and Cricklewood.</p> <p><i>Amend part k), Part l) and add new part l) (i) to 'Community and Cultural Facilities' of the policy to read:</i></p> <p>k) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development especially the provision of new education, health, cultural and community facilities notably</u> Securing infrastructure in South Kilburn. to include a new community space, 3 form of entry primary school and nursery and other community uses.</p> <p>l) Enhance and protect playing pitches fields at Gladstone Park and leisure provision at Willesden Green Sports Centre.</p> <p><u>l i) Promoting increased cultural and community use of the Gaumont State Cinema.</u></p> <p><i>Amend 'Employment and Skills' of the policy to read:</i></p>	<p>Leisure Needs study (EB_E_06), changes to Use Class Order and wider range of social infrastructure.</p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>Supporting the local economy by:</p> <ul style="list-style-type: none"> m) Protecting and enhancing Queen’s Park Creative Cluster Quarter and South Kilburn Enterprise Hub. n) Supporting the establishment of new Creative Clusters Quarters at Kilburn and Willesden Green. o) Within Creative Quarters Clusters proposals to redevelop local employment sites will be required to re-provide high quality affordable workspace on site in accordance with policy BE3. p) The conversion of vehicle repair premises on Hassop Road to employment industrial uses which improve amenity for neighbouring residential units will be supported. 		
MM57	5.6 South East Place	BSEGA1, page 189	<p><i>Amend last paragraph of policy to read:</i></p> <p>South Kilburn Growth Area will deliver approximately 3,400 over 2,100 new homes <u>(or a minimum 800 net additional homes one demolitions are taken into account)</u> to 2041, supported by social and physical infrastructure to include:</p>	To better reflect gross and net development within the South Kilburn growth area over the lifetime of the Local Plan.	Yes. Change in housing target.
MM58	5.6 South East Place	BSESA1, page 192-193	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 56-10 Years 11+ Years</p> <p>Address</p>	To increase brevity and make consistent approach with updated housing	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>1 -167 Austen House, Cambridge Road, <u>NW6 5YL</u></p> <p>PTAL Rating 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site benefits from Good public transport accessibility levels, being in walking distance of Kilburn Park and Kilburn High Road Station mean a car free development should be the starting point. <p>Design Principles</p> <ul style="list-style-type: none"> Austen will be a perimeter block courtyard building ranging from 4-6 storeys. It will provide frontage to Cambridge Road, the extension of Percy Road, Stafford Road and the public realm between it and the new Blake Court development to the south. The scale and form of the development should seek to prevent north facing single aspect units. It should maximise sunlight and daylight to the courtyard and adjacent northern property through the lower storey heights being on the southern and northern sides of the perimeter blocks. It is proposed that The existing uses of Catholic Church and Community Centre should be being incorporated into the redevelopment, in relation to the Church this can be by the building remaining in situ or provision of a new building that incorporates these church and community uses. <p>Justification</p>	<p>trajectory and Local Plan.</p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> The block is of poor construction that it is not viable nor desirable to refurbish, The blocks sit within a poor quality landscape..of disparate open space and garages which can be replaced by Capacity for more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets. 		
MM59	5.6 South East Place	BESAS2, page 194-195	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 121 56-10 Years 11₀+ Years</p> <p>Address 1-72 Blake Court, Malvern Road, <u>NW6 5PW</u></p> <p>PTAL Rating 3-5 (<u>current and 2031 estimate</u>)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. A terrace of locally listed buildings are located to the west of the site along Malvern Road. The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station <u>mean a car free development should be the starting point.</u> 	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs and locally listed buildings.	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>Design Principles</p> <ul style="list-style-type: none"> • Blake will be a perimeter block building ranging in height from 4-8 storeys. It will provide active frontages to Cambridge Road, the extension to Percy Road and between the Dickens site to the north and McDonald House/Hampton Close site to the south. • A new public pedestrian link will be provided on the southern frontage. • <u>The development should positively address the setting of the terrace of locally listed buildings located to the west of the site along Malvern Road.</u> • Taller elements up to 8 storeys to be integrated at key prominent frontages/corners on Malvern Road and Cambridge Road to indicate the new neighbourhood entrances. • The scale and form of the development should seek to prevent north facing single aspect unit and maximise sunlight and daylight to the courtyard. <p>Justification</p> <ul style="list-style-type: none"> • Blake House redevelopment sites suffer from inherent internal design problems and the relationships between buildings, streets and spaces are also poor and indeterminate. • The block is of poor construction that it is not viable nor desirable to refurbish, The blocks sit within a poor quality landscape. of disparate open space and garages which can be replaced by • <u>Capacity for</u> more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets. 		
MM60	5.6 South East Place	BSESA3, page 196-197	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 116</p>	To increase brevity and make consistent	No. Amendments for clarity,

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>56-10 Years 110+ Years</p> <p>Address 113-128 Carlton House and Carlton Hall, Denmark Road, NW6 5DX</p> <p>PTAL Rating 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station mean a car free development should be the starting point. <p>Justification</p> <ul style="list-style-type: none"> The removal of another Carlton House block in association with the Peel development creates an opportunity to reinstate the traditional street pattern and clearly define street frontages To give greater clarity about better identify and improve both private and public outdoor spaces and improve tenants shared private space and Higher density development of currently underutilised make better use of land. which is developed to low densities. A new dedicated community hub is provided at Carlton and Granville Centre as part of the wider masterplan. 	<p>approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.</p>	<p>brevity, and consistency only.</p>

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
MM61	5.6 South East Place	BESAA4, page 198-199	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 0<u>1</u>-5 Years 6<u>5</u>-10 Years 1<u>1</u>0+ Years</p> <p>Address Carlton Vale Infant School, Malvern Place, NW6 5PX</p> <p>PTAL Rating 2 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site is Currently occupied by a school, However, the school is to be relocated to another site within the Growth Area. <p>Design Principles</p> <ul style="list-style-type: none"> A frontage will be reinstated along Malvern Road that provides a transition in set-back distance from 121 Malvern Road and 17-32 Kilburn House, Malvern Place. This active frontage which will play a strong role in providing overlooking of South Kilburn Park will also turn the corner with and along Malvern Place. Building heights will range between 4 and 6 storeys. Malvern Road will be reinstated with sufficient space provided to ensure vehicles can turn into it from Malvern Place. This will form the principal 	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.	No. Amendm ents for clarity, brevity, and consiste ncy only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>vehicular route as it is proposed to close vehicular access between Malvern Road and Carlton Vale.</p> <ul style="list-style-type: none"> Ideally no or very limited car parking shall be provided between the new building frontages and the highway and landscaping and planting should be improved If it is, greater attention should be paid to both softening its impact on in the street scene. incorporating better quality planting than exhibited at Nexus Court. <p>Justification</p> <ul style="list-style-type: none"> The site will become available following completion of the move of the school to its new site on the Wordsworth and Masefield the site will allowing it to be predominantly be developed for residential purposes. In addition what was Formerly Malvern Road highway land will be improved as a pedestrian and cycleway to form a continuation of the street that links up with Malvern Place. 		
MM62	5.6 South East Place	BESAS5, page 200-201	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity 120-50 net (121 gross)</p> <p>Timeframe for Delivery 01-5 Years 20-121 566-10 Years 40071 1110+ Years</p> <p>Address 1-167 Dickens House, Malvern Road 1-78 Craik Court, Carlton Vale, NW6 5HN</p> <p>PTAL Rating 5 increasing to 6a in 2031 (current and 2031 estimate)</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London Plan policies and incorporate	Yes. Amendm ents to site capacity.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> Create a sStrong frontages along Carlton Vale, with active ground floor uses if viable, and frontage along Canterbury Road and Neville Close. <u>aActive ground floor uses if viable, with sufficient space for tree planting on Carlton Vale.</u> To rRespond to the gateway context and heights of William Dunbar House / Peel and the land-mark Canterbury Road/Carlton Vale corner position by creating a tall building up to 14 storeys whilst dDropping in height towards Peel to 4 storeys to provide variety on townscape and facilitate daylight/sunlight to the buildings that will run along the Canterbury Road frontage. <p>If commercial frontage is provided this will be expected to be on the pavement edge, but sufficient space must be provided to facilitate tree planting defining Carlton Vale's boulevard status/typology.</p> <p>Justification</p> <ul style="list-style-type: none"> Poor quality residential block which it is neither viable nor desirable to refurbish. The oppportunity exists to create a stronger corner which will act as a gateway to South Kilburn 	essential infrastructure needs.	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> to eContinuation of a commercial ground floor use from Queen's Park to Peel (if viable) whilst continuing the step change inImproving the quality of mixed use and mixed tenure residential accommodation. 		
MM63	5.6 South East Place	BESAS6, page 202-203	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 45 56-10 Years 100 110+ Years</p> <p>Address 1-85 Crone Court, Denmark Road, NW6 5BX and 1-10 Zangwill House Rupert RoadCarlton Vale, NW6 5BY, Canterbury Road</p> <p>Description of Existing Site A more +Traditional, but poor quality, 1950s residential blocks of 12 and 4 storeys, facing onto a communal private/ semi-public space. in poor quality. Crane is a 12-storey block of 85 dwellings and Zangwill is a four-storey block of ten dwellings. Crone Court and Zangwill are separated from Woodhouse Urban Park by Denmark Road. Both blocks have historically had a +Lack of clarity about what is the front or back of the buildings property, and between public and private space, although Zangwill more recently has made this more apparent by incorporating a 6-foot close boarded fence along Rupert Road. The eEntrances to both are set in a public realm principally dominated by car parking with a limited amount of green space, at one of its entrances. Both blocks face on to a communal private/semi-public space.</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London Plan policies and incorporate essential infrastructure needs.	No. Amendm ents for clarity, brevity, and consiste ncy only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>PTAL Rating 4 to 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station mean a car free development should be the starting point. <p>Justification</p> <ul style="list-style-type: none"> Current buildings The accommodation is are not viable to maintain or bring up to modern day standards. Redevelopment provides an opportunity to create a stronger frontage onto Woodhouse Urban Park and better integrate the site with adjacent streets including Canterbury Road where there is currently no defined frontage and better integrate the site into the wider development. whilst continuing the step change in Improvement in the quality of mixed use and mixed tenure residential accommodation. 		
MM64	5.6 South East Place	BESA7, page 204-205	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 40 56-10 Years 22 110+ Years</p> <p>Address 1-167 Dickens House, Malvern Road, NW6 5YP</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>PTAL Rating 3 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. • A terrace of locally listed buildings are located to the west of the site along Malvern Road. • The site benefits from Good public transport accessibility levels, being in walking distance of Queen’s Park Station mean a car free development should be the starting point. <p>Design Principles</p> <ul style="list-style-type: none"> • Dickens will be a perimeter block building ranging from 4-7 storeys. It will provide frontage to Malvern Road and the extension of Percy Road. • <u>The development should positively address the setting of the terrace of locally listed buildings located to the west of the site along Malvern Road.</u> • Taller elements up to 7 storeys to be integrated at key prominent corners to indicate the new neighbourhood entrances. • The Dickens development will be dDesigned and orientationed to avoid overlooking issues with the neighbouring school. • The scale and form of the development should seek to prevent north facing single aspect units. • It should maximise sunlight and daylight to the adjacent school through the lower storey heights being on the south western side of the perimeter block. 	(Policy BT2) and London Plan policies and incorporate essential infrastructure needs.	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. This site is very sensitive to foul water flows. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree a drainage strategy and a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. <p>Justification</p> <ul style="list-style-type: none"> The blocks are are of poor construction that it is not viable nor desirable to refurbish, The blocks sit within a poor quality landscape, of disparate open space and garages which can be replaced by Capacity for more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets. 		
MM65	5.6 South East Place	BSESA8, page 206-207	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity 20296 net (250 gross)</p> <p>Timeframe for Delivery 01-5 Years 20296 56-10 Years 110+ Years</p> <p>Address</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London Plan	Yes. Reference to new SFRA Level 2, and change in housing capacity.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>1-124 Hereford House, Carlton Vale, NW6 5QH and 1-32 Exeter Court, Cambridge Road, NW6 5AJ Carlton Vale</p> <p>PTAL Rating 6a (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. • South Kilburn Conservation Area is to the north of the site. A locally listed building 71 Cambridge Road is located adjacent the site to the north east. • The site benefits from a High public transport accessibility level, being in walking distance of Kilburn Park and Kilburn High Road Stations mean a car free development should be the starting point. • <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> <p>Design Principles</p> <ul style="list-style-type: none"> • The creation of The new Granville Park, on the west of the site, will improve access to open space in the area and also create an overlooked public route from Carlton Vale to Granville Road. It will complement South Kilburn open space by providing a more intimate space, with a high quality hard paved area to encourage use in all seasons. • To the east residential perimeter blocks arranged around a courtyard should range in height from 4 to 12 storeys and positively address all external frontages providing overlooking and appropriate set-backs for residents' privacy and sufficient planting space. 	<p>policies and incorporate essential infrastructure needs and incorporate SFRA Level 2.</p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> • <u>South Kilburn Conservation Area is to the north of the site. A locally listed building 71 Cambridge Road is located adjacent the site to the north east. The scale height, massing, design and detailing of the proposed buildings should preserve and enhance the settings of adjoining heritage assets.</u> Lower storey elements are to be located to the north towards the conservation area <u>these heritage assets</u>, with taller elements fronting Carlton Vale. A variety of heights along the southern, eastern and western frontages will both add interest and provide the opportunity for sunlight/<u>daylight</u> to penetrate into the internal space and dwellings. The scale height, massing, design and detailing of the proposed buildings should be such that they do not undermine the need to preserve and enhance the settings of adjoining heritage assets. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Open space <u>to be relocated from the north of Granville Road</u> • Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. The site is only served by foul sewers. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way. <p>Justification</p>		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> The existing buildings are of poor design and construction, creating poor housing conditions and potential for anti-social behaviour in communal spaces, which cannot be remedied cost efficiently through refurbishment. The opportunity exists to provide Provision of better housing along sound urban design principles, creating a human scale environment that integrates with the surrounding area and is more sympathetic in scale to the conservation area. It will be at a dDensity that reflects the PTAL rating and reinforces the street hierarchy. and setting of Carlton Vale in particular, subject to the council being able to ensure Granville Road is reopened between this site and the Carlton and Granville Centres which subsequently will result in the existing Replacement of the Granville Open Space which is being developed for housing, (see site allocation BESA11) with a This site will incorporate its replacement open space. This will provide a better quality open space with greater opportunity for better sunlight penetration, overlooking/sense of security and more due to its prominence is more likely to be used by the surrounding population. position, which will increase usage. 		
MM66	5.6 South East Place	BESA9, page 208-209	<p>Timeframe for Delivery 01-5 Years 0 56-10 Years 0 1110+ Years 0</p> <p>PTAL Rating 5 increasing to 6a in (current and 2031 estimate)</p> <p>Planning Considerations</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station mean a car free development should be the starting point. <p>Justification</p> <ul style="list-style-type: none"> The existing school will be transferred to the Wordsworth House/Masefield House site which also incorporates some of the existing South Kilburn Open Space. There will be no net loss of open space. The use of open space for this site will be of significant benefit. It will create a more regular shaped open space that can be put to better use and feel more secure. It will rRaise of the profile of the space in the public's consciousness and its impact on townscape by opening up views into the park when arriving from Queen's Park/Kilburn Lane. 	Plan policies and incorporate essential infrastructure needs.	
MM67	5.6 South East Place	BES10, page 210-211	<p>Timeframe for Delivery 01-5 Years 148 56-10 Years 110+ Years</p> <p>Address 1-8 Neville House, Denmark Road NW6 5BT, and 1-64 Winterleys, Albert Road, NW6 5DR</p> <p>PTAL Rating 4 to 5 (current and 2031 estimate)</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London Plan policies and	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> Development should take influence from the Albert Road and Bond developments and integrate into the new layout. An active building frontage should be provided along Woodhouse Urban Park and Denmark Road. Heights should range from 2 to 9 storeys, with taller elements fronting Woodhouse Urban Park. Building are to be arranged around a courtyard with breaks in height to allow maximise daylight and sunlight into the heart of the buildings. <p>Justification</p> <ul style="list-style-type: none"> The blocks are in a poor state of repair and represent a poor overall use of the space. There is an opportunity to provide more dwellings <u>of a better design which are more integrated with the surrounding environment.</u> in a better environment which better addresses streets and integrates with the new development to the north and east. It will also create a stronger relationship with Woodhouse Urban Park. In addition, t <u>The</u> creation of a courtyard will give residents access to more useable private space. 	incorporate essential infrastructure needs.	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> This will contribute to the continued step change Improvement in the quality of mixed use and mixed tenure residential accommodation and public space. 		
MM68	5.6 South East Place	BSESA11, page 212-213	<p>Indicative Capacity 1020</p> <p>Timeframe for Delivery 01-5 Years 020 56-10 Years 10 110+ Years 0</p> <p>Description of Existing Site aA small public open space essentially of seating areas and forming within a typically functional municipal landscape created in the early phases of the South Kilburn estate's regeneration. The site is currently a public connection between the two parts of Granville Road, which was severed by extension of the grounds of the Iranian school over public highway. It also incorporates The space is poorly overlooked with no adjacent frontage development and backs on to rear boundary fences of villas on Princess Road, increasing their risk of being subject to crime.</p> <p>PTAL Rating 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and an Air Quality Management Area where major developments are required to be Air Quality Positive. South Kilburn Conservation Area adjoins the site on its northern boundary. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan policies Plan (Policy BSUI2 and Policy BT2), incorporate essential infrastructure needs and to account for fact that the re-purchase of the original street is now considered unlikely to be possible.	Yes. Amendments to site capacity.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> • The site comprises open space. Compensatory open space of equivalent quality quantity and higher quality will be provided as part of the Hereford House and Exeter Court (BESAS8) site development. • As with the majority of Brent the site is located within an Air Quality Management Area. • Major developments within Growth Areas are required to be Air Quality Positive. • The site benefits from a high public transport accessibility level, being in walking distance of Kilburn Park and Kilburn High Road Stations. mean a car free development should be the starting point. A bus stop is adjacent to the site on Carlton Vale. <p>Design Principles</p> <ul style="list-style-type: none"> • To essentially replicate Replication of the character of the adjacent buildings. by • creating buildings of a modest height (typically 4 storeys with opportunities to vary by one storey as has occurred on the adjacent sites). • The buildings will frontage to the street and be set back from the pavement edge in a similar manner to that of 21-53 Granville Road, to give This will provide sufficient room for a defensible space, to ensure residents' privacy whilst • for incorporation of sufficient landscaping to enhance the street setting. <p>Justification</p> <ul style="list-style-type: none"> • Public consultation identified that this space is not widely used or known. due to its limited visibility and lack of attractions is essentially unknown to the majority of the surrounding population. • † The redevelopment of the site is not dependent upon the reopening of Granville Road currently incorporated into the Iranian school, although this would be preferable. might improve its accessibility and raise public 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>awareness there is no certainty that its inherent potential weakness; a lack of natural surveillance will be satisfactorily addressed.</p> <p>As such it is considered that there is merit in transferring the</p> <ul style="list-style-type: none"> • Equivalent open space will be provided within to the Hereford House and Exeter House development, which <p>This site would then be redeveloped for residential purposes. It is recognised that this is likely to reduce the amount of dwellings delivered in South Kilburn; the Hereford/Exeter site which would incorporate the new open space can be developed at a higher density. Nevertheless, the reintroduction of the historic building line, likely reduction in the potential for crime and anti-social behaviour within the public realm and greater likely use of the alternative open space merit this approach.</p>		
MM69	5.6 South East Place	BESA12, page 214-215	<p>Indicative Capacity Unknown -40 net</p> <p>Timeframe for Delivery 01-5 Years 56-10 Years -40 110+ Years</p> <p>Address 1-29 Wordsworth House NW6 5YT, and 1-11 Masefield House, NW6 5YU, both Stafford Road</p> <p>PTAL Rating 3 to 4 (current and 2031 estimate)</p> <p>Planning Considerations</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies, reflect the need to replace existing community facility and incorporate essential	Yes. Re-provision of a MUGA, and change in housing capacity.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. • Part of the site is open space. Reprovision of open space of the same quantity and improved quality will need to be reprovided as part of the reconfiguration of the Kilburn Park Junior School Site. • Retention of There are a number of mature trees on the site which should be retained. • <u>Reprovision of the existing Multi-use Games Area (MUGA) which is present at the Kilburn Park Junior School site, together with a community use agreement covering this, and other spaces such as halls, within the school.</u> <p>Design Principles</p> <ul style="list-style-type: none"> • The Three storey school building (with potentially with for additional modest height increases to accommodate residential development, should this be provided to meet staff needs) • with clearly defined and animated frontages • will provide a perimeter block on Stafford Road and Percy Road, plus public realm to the south between it. • To the west the school's grounds will extend to include some of the current South Kilburn open space as a dual-purpose This amenity and learning space. • will retain the Retention of maturing trees and provide a more clearly defined boundary to the remaining open space. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • New 3FE school building • When further information on the scale of development is available Thames Water will need to be engaged to establish impact on water supply network 	infrastructure needs.	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>and water treatment infrastructure. <u>at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development prior to the development creating identified additional capacity requirements.</u> There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p>		
MM70	5.6 South East Place	BSESA13, page 216-217	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 56-10 Years 35-29 110+ Years</p> <p>PTAL Rating 4 (<u>current and 2031 estimate</u>)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area <u>and an Air Quality Management Area where major developments are required to be Air Quality Positive.</u> Part of the west portion of the site which is currently serving as a car park has flood zone 3a (surface water) concerns, as does the adjacent Chippenham Gardens road, in particular its junction with Malvern Road. This site is only served by foul sewers and has limited access to the Ranelagh Trunk Sewer (in Kilburn Park Road). SuDS should be utilised and the surface water disposal hierarchy will need to be clearly demonstrated to determine the most appropriate discharge location. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan policies Plan (Policy BSUI2 and Policy BT2) and incorporate essential infrastructure needs.	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> • As with the majority of Brent the site is located within an Air Quality Management Area. Major developments within Growth Areas are required to be Air Quality Positive. • The site benefits from Good public transport accessibility levels, being in walking distance of links with a PTAL rating of 4, being within a 12-minute walk of 3 bus stops and Queens Park, Kilburn Park and Westbourne Park Underground Stations <u>mean a car free development should be the starting point.</u> <p>Risks Relocation of current residents and their opposing. <u>Need to decant existing residents.</u></p> <p>Design Principles</p> <ul style="list-style-type: none"> • The frontage is to activate the street and interact with the new Chippenham Gardens development. • The new building should be 5 to 7 storeys and complement the heights of new developments along Malvern and Kilburn Park Road. • The development should extend to the plot boundaries, to provide for the incorporation of a useable amenity space to the rear for residents. • The layout will have to positively address the massing concerns and interaction with Malvern Place; overcoming the potential for a blank wall, and undefined space to be a product of the regenerated site. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Green space. • Cycle parking. • Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p>		
MM71	5.6 South East Place	BSESA14, page 218-219	<p>Indicative Capacity 213 gross (66 net dwellings taking account of demolition)</p> <p>Timeframe for Delivery 01-5 Years -147 56-10 Years 213 110+ Years</p> <p>Address 1-74 William Dunbar House, Albert Road, NW6 5DE, and 1-74 William Saville House, Denmark Road, NW6 5DGE</p> <p>PTAL Rating 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and an Air Quality Management Area where major developments are required to be Air Quality Positive. West Kilburn Baptist Church to the south of the site is a Local Heritage Asset. The perimeter of the site is lined with numerous trees which should be retained. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BSUI2 and Policy BT2) and London Plan policies and incorporate essential infrastructure needs.	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> • As with the majority of Brent the site is located within an Air Quality Management Area. • Major developments within Growth Areas are required to be Air Quality Positive. • A small section of the site to the north east has a history of industrial usage and will therefore require testing for contamination, with potential remediation works being carried out. • The site benefits from gGood public transport accessibility levels links with a PTAL rating of 5, being with a 5-minute walk of 2 bus stops and in walking distance of Queen's Park train station. <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> • Development is to create a strong active frontage along Carlton Vale, comprising ground floor commercial uses. • Buildings should generally range in height from 5 to 9 storeys. As a gateway to South Kilburn there is also an opportunity for a taller element of up to 17 storeys to create a sense of arrival. • The demolition of William Saville House offers the potential of for a pedestrian link to Carlton Vale which should to be provided and development provided along this active frontage to create overlooking and improve safety. environment. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Cycle parking. • Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Local upgrades to the existing water network infrastructure may be required to ensure 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>sufficient capacity is brought forward. The site is only served by foul sewers. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p> <p>Justification</p> <ul style="list-style-type: none"> • The site is in a prominent gateway location and the current development does not capitalise on this. • There is an opportunity for development to create a sense of arrival and present a stronger active frontage along Carlton Vale, brought to life with commercial units at ground floor to strengthen connections between Queen's Park station/Salusbury Road and the Peel development which will provide a key health facility destination. • In addition, opening up the Denmark Road to pedestrian movement will allow improved connections from the South Kilburn estate into the wider area. 		
MM72	5.6 South East Place	BSESA15, page 220-221	<p>Timeframe for Delivery</p> <p>0<u>1</u>-5 Years 5<u>6</u>-10 Years 1<u>1</u>0+ Years</p> <p>PTAL Rating</p> <p>5 (current and 2031 estimate)</p> <p>Planning Considerations</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area <u>and an Air Quality Management Area where major developments are required to be Air Quality Positive.</u> • The community facility is meeting a local need and is to be retained as part of any redevelopment of the site. • South Kilburn Conservation Area lies to the east of the site, but is not visible from the site due to Peel Precinct. • The West Kilburn Baptist church which adjoins the site is a locally listed building. A detailed analysis will be required of the potential impact on the church and its context. • The site has historically been in industrial use, therefore a preliminary risk assessment for contamination will be required, and to identify if there is potential for contamination. If necessary, further investigations and remediation will be required. • As with the majority of Brent the site is located within an Air Quality Management Area. Major developments within Growth Areas are required to be Air Quality Positive. • The site benefits from Good public transport accessibility levels links with a PTAL rating of 4, being in walking distance of with a 5 minute walk of 2 bus stops and Queens Park train station <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> • To create an active ground floor use that extends the proposed frontage linking <u>with</u> Queen's Park and Peel. • The opportunity exists to create A corner landmark building rising to 6 storeys, and possibly higher if incorporating the Baptist Church car park, depending <u>on</u> relationship with <u>other nearby</u> adjacent existing or proposed 	(Policy BSUI2 and Policy BT2) and London Plan policies and incorporate essential infrastructure needs.	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>buildings, produces a successful solution in terms of sympathetic relationship/overlooking/overshadowing of other buildings.</p> <ul style="list-style-type: none"> The West Kilburn Baptist Church is to be retained and its setting enhanced. <p>Justification</p> <ul style="list-style-type: none"> The premises are a Currently poor piece of townscape at a very low density, presenting blank walls to adjoining public realm. given the Good PTAL rate and higher density emerging context. potential heights of adjacent developments such as Craik House. The building currently presents essentially blank facades to the adjoining public realm. The Opportunity exists to develop at a much higher density, particularly if incorporating the adjacent West Kilburn Baptist Church car park, whilst maintaining and improving the existing community use. 		
MM73	5.6 South East Place	BESA16, page 222-223	<p>Timeframe for Delivery 01-5 Years 56-10 Years 110+ Years</p> <p>Address The Oxford Kilburn (OK) Club Neville Road, NW6 5BT and Christian Holt House, 45 Denmark Road, NW6 5BP</p> <p>PTAL Rating 4 to 5 (current and 2031 estimate)</p> <p>Planning Considerations</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BT2), London Plan policies and incorporate essential infrastructure needs.	Yes. Reference to water infrastructure requirements.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area <u>and an Air Quality Management Area where major developments are required to be Air Quality Positive.</u> • The community facility is meeting a local need and is to be retained, as part of any redevelopment of the site. • There are no flood zones within the site, but potential for surface water flooding on the adjacent Neville Road. • There are mature trees on the western boundary of the site which will need to be retained and protected during construction works. • South Kilburn Conservation Area lies to the east of the site, but is not visible from the site due to Peel Precinct. • As with the majority of Brent the site is located within an Air Quality Management Area. Major developments within Growth Areas are required to be Air Quality Positive. • The site benefits from Good public transport <u>accessibility levels, being in walking distance of</u> links with a PTAL rating of 4, being within a 5 minute walk of 2 bus stops and Queens Park train station <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> • A perimeter block on three sides that provides the community use on the ground/lower floors and has active frontages and a positive relationship with the adjacent highways of Denmark Road, Canterbury Road and Neville Road. • Consideration should be given to limiting impacts on the development <u>capacity</u> of the adjacent Crone and Zangwill sites, as set out in this SPD, with a view to not undermining its identified development capacity. • The heights of proposed buildings should be up to 6 storeys to reflect the scale of the street, and in-particular the other side of Neville Road as proposed in the Peel development. 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> Ideally the Dylan Kirby memorial wall should be kept in situ, or appropriately incorporated into the new building. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Replacement of the community facilities of sufficient size and quality either on or off-site, or in very close vicinity, to be able to serve South Kilburn's needs. <u>Thames Water has indicated the scale of development could require upgrades to water supply capacity and is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> <p>Justification</p> <ul style="list-style-type: none"> The Trust has approached the council regarding the potential Regeneration of the site <u>whilst providing</u> to better support its activities in contemporary premises fit for sustaining the charity's <u>activities and</u> long term purpose, and improving outcomes for young people. Ideally the community use will remain on site, <u>however</u> with re-provision occurring in new buildings. Nevertheless, in the context of planning policy, off-site re-provision may be possible, as long as it can be justified to show <u>providing there would be</u> nil detriment in terms of meeting any local community needs compared to the existing premises. Although in the context of South Kilburn, some of the buildings are older than their surroundings, they are not considered to be of such historic or architectural significance that <u>their</u> they should necessarily be retained if high quality replacements <u>with higher quality buildings would be unacceptable.</u> are proposed. 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> The Dylan Kirby memorial is clearly well regarded by the local community and its sympathetic incorporation into any regeneration needs to be considered. 		
MM74	5.6 South East Place	BESAs17, page 224-225	<p>Timeframe for Delivery 0<u>1</u>-5 Years 5<u>6</u>-10 Years 200 1<u>1</u>0+ Years 180</p> <p>PTAL Rating 3 to 4 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The north of the site backs onto the Proximity to railway, and includes the railway trackside which is designated as both a wildlife corridor and a Grade 1 Site of Importance for Nature Conservation (Dudding Hill Loop between Cricklewood and Harlesden BI06C). Care should therefore be taken so as not to disturb this valued ecosystem. The car parks are verged with vegetation of varying quality, including bushes and trees. There are also 3 trees on the path along Cricklewood Broadway should not be adversely affected by the development. As with the majority of Brent the site is located with In an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive neutral. Significant areas of car parking and parts of Longley Way are within Flood Zone 3a due to surface water flooding. This is associated with the large areas of impermeable paving and lack of vegetation. It will need to be demonstrated through a Flood Risk Assessment how surface water flooding will be mitigated and development not increase flood risk will be made flood resilient. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BT2), London Plan policies and incorporate essential infrastructure needs.	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> The site has a history of industrial use and will therefore require testing for contamination, with any potential remediation works being carried out. <p>Design Principles</p> <ul style="list-style-type: none"> The development should relate be sympathetic to the general character and scale of the high quality residential area to the south along Temple Road and on the opposite side of Edgware Road. Along Edgware Road, in recognition of the variation in heights along its length from Kilburn in the south up to this point, and its identification as an intensification corridor towards the north it is considered that heights of up to 5 storeys will be appropriate. Along Temple Road and the west of the site that adjoins two storey dwellings, development should successfully relate to the scale of these. Due to the proximity to the wildlife corridor and SINC and to help address issue with surface water flooding, and poor air quality along the A5 the development should include significant green infrastructure, particularly along its edges, incorporating nature and enhancing it in the process. The introduction of greenspace will the site and in the process increase ground permeability, reducing any flooding concerns. Given the poor air quality along the A5 and surface water flooding, it will be important for development to seek to increase soft landscaping and reinforce tree planting along the highway. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Potentially parking. Green infrastructure. Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Thames Water will need to be engaged at the earliest opportunity to ensure essential 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p> <p>Justification</p> <ul style="list-style-type: none"> • This is a large site which is currently being used for very low intensity purposes, and would be much better utilised Opportunity to optimise the density of the site for the development of homes. • Currently having low aesthetic and ecological value, the site could be developed to incorporate nature, creating a vibrant and relaxing place for people to live. • Due to the size of the site it should be feasible to include high density elements increasing the site's utility. 		
MM75	5.6 South East Place	BESA18, page 226-227	<p>BESA18 245-289 CRICKLEWOOD BROADWAY AND HASSOP ROAD</p> <p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 0<u>1</u>-5 Years 5<u>6</u>-10 Years 40 1<u>1</u>0+ Years 40</p> <p>Address 24<u>3</u><u>5</u> 289 Cricklewood Broadway and Hassop Road, London, NW2 6NX</p> <p>Area 0.6<u>9</u><u>5</u>ha</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3 and Policy BT2) and London Plan policies, incorporate	Yes. Reference to water infrastructure requirements. Viable industrial floorspace amount likely to

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>PTAL Rating 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site forms part of Cricklewood Town Centre’s secondary shopping frontage. Developments should therefore be in keeping with the local character and retain ground floor commercial frontages. • This site is adjacent the Cricklewood Railway Terrace Conservation Area which lies on the opposite side of the Edgware Road in Barnet. • As the site has a high PTAL and a Controlled Parking Zone is in place car free development will be required. • As with the majority of Brent the site is located Within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive neutral. • The majority of the site has historical industrial usage and will therefore require testing for contamination, with any potential remediation works being carried out. • There are two trees along Cricklewood Broadway, adjacent to the site, which should be retained and planting reinforced. • Hassop Road includes industrial businesses which are negatively impacting on the amenity of neighbouring residents. Policy BP6(q) promotes the conversion of premises on Hassop Road to employment industrial uses which improve amenity for neighbouring residential units. • Draft London Plan policy E4 identifies Brent as a borough which is to provide additional industrial capacity. As such, As a Local Employment Site, the maximum viable amount of an increase in employment industrial floorspace will be sought required as part of any redevelopment, in accordance with policy BE3. 	essential infrastructure needs and industrial re-provision.	be less than the previous requirement for an increase.

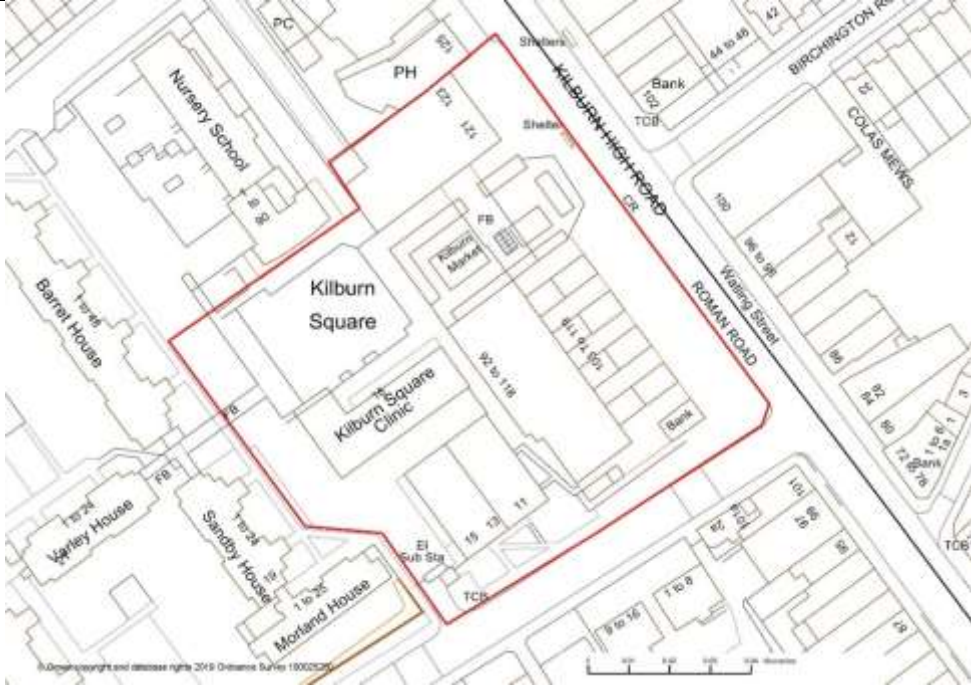
Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> With a PTAL rating of 5 the site is well provided for with 2 bus stops, serviced by numerous buses, and Cricklewood train station within a 10 minute walk of the site. <p>Design Principles</p> <ul style="list-style-type: none"> Constituting part of the Cricklewood Town Centre secondary frontage, development should retain a ground floor commercial frontage. <u>Cricklewood Railway Terrace Conservation Area is opposite on Edgware Road in Barnet.</u> Development should respond to the height and proportions of adjoining 3-storey development and be of a quality which complements local character. Given the poor air quality along the A5 and surface water flooding it will be important development seeks to increase soft landscaping and reinforce tree planting along the highway. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> <p>Justification</p> <ul style="list-style-type: none"> The Current buildings currently occupying the site is are of little aesthetic value, and is being composed primarily of materials such as concrete and corrugated iron. This is not in keeping with local character and, if redeveloped, could become more harmonious with this character. The site is in an area of high PTAL and currently underutilised as low density commercial uses. 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> A mixed use development including housing would help support the vitality of the town centre. The public domain in front of the site is quite spacious and would benefit from the introduction of more green infrastructure. Draft London Plan Policy E7 requires development proposals on all categories of industrial land to intensify businesses industrial uses in Use Classes E(g) B1c, B2 and B8. As such an increase in employment industrial floorspace will be sought. There is a need for additional industrial space in Brent, a redevelopment of old industrial premises allows the opportunity to re-provide better quality space. Existing vehicle repair garages are negatively impacting on the amenity of adjoining residents. Replacement with lighter industrial uses would help reduce amenity impacts. 		
MM76	5.6 South East Place	BSESA19, page 228-229	<p>Timeframe for Delivery 01-5 Years 56-10 Years 110+ Years</p> <p>Description of Existing Site Part of the building is currently used as a church. The site is adjoined by car parking. <u>Gaumont State cinema is a Grade II* listed Art Deco movie palace designed by George Coles. Opened in 1937, it had the greatest audience capacity of any English cinema (4,004 seats). It also had a fully equipped stage for theatre use including workshops and dressing rooms. Its 37 metre tower is inspired by the Empire State Building. The interior is in an opulent Classical style and includes the original Wurlitser organ.</u></p> <p>PTAL Rating 4-6 (2015/2031) 4 to 6 (current and 2031 estimate)</p>	To increase brevity, clarity of existing site, make consistent approach across the housing trajectory, Local Plan and London Plan policies, ensure viability of the cinema building and provide clarity	No. Amendm ents for clarity, brevity, and consiste ncy only.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>Planning Considerations</p> <p>The Gaumont State cinema is a Grade II* listed Art Deco movie palace. The building opened in 1937 and was originally designed as a cinema but with a fully equipped stage for theatre use including workshops and dressing rooms. It has a long history as a cultural and community venue. As well as a cinema, it served as a popular music venue for a number of years. Its 37 metre tower is inspired by the Empire State Building. The interior is in an opulent Classical style and includes the original Wurlitser organ. One of the largest and most impressive movie palaces ever constructed in Britain, the Gaumont State, had the greatest audience capacity of any English cinema (4,004 seats). On the corner on Willesden Lane was an imposing second entrance with restaurant and dance floor above. Both externally and internally, George Coles (the architect) brilliantly orchestrated the decoration and space.</p> <ul style="list-style-type: none"> • <u>The size and quality of the building has significant potential as a cultural or leisure destination to support Kilburn's role as a major town centre and in London's night time economy and as such its more intensive use to support these objectives will be supported.</u> • Given its <u>Grade II* Listed</u> significance early consultation is advised with consultees such as Historic England, C20 Society, and Theatres Trust. <u>Applications for changes of use and substantial alterations to the building will need to be supported and justified within a Heritage Statement.</u> • <u>Continued access to the</u> adjacent carpark <u>area</u> and workshop at the rear which, when back in use, would be <u>are considered</u> essential to the long term viability of <u>servicing</u> the building <u>for large scale productions and should not be compromised.</u> Any proposals for the building and the car park must be considered with this in mind. 	<p>on early engagement and associated evidence to support applications.</p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> • The site is adjacent Brondesbury Mews which has a terrace of Locally Listed Buildings. • The site is also adjacent an area which has been identified in the Heritage and Place-making Strategy for designation as a possible conservation area extension to the Kilburn Conservation Area. • The building is located within Kilburn Major Town Centre. • The area benefits from High public transport accessibility levels <u>within walking distance of</u> Kilburn High Road station and Brondesbury Park are the closest tube and overground stations. The area is also served by various bus routes from 6 bus stops within the vicinity. <u>Car free development is the starting point.</u> • The site is Within an Air Quality Management Area, with the adjoining A5 being a major source of both air and noise pollution. As a minimum development is to be Air Quality Neutral. <p>Design Principles</p> <ul style="list-style-type: none"> • <u>As well as being a building of significance it is adjacent to a terrace of locally listed buildings in Brondesbury Mews and a possible conservation area extension to the Kilburn Conservation Area (see Heritage and Placemaking Strategy). As such, retention, preservation and enhancement of</u> Any proposals will be required to retain and enhance the Gaumont State building and its setting <u>are required.</u> the building's interior forms part of its significance and should be preserved. Applications for substantial alterations to the building will need to be supported and justified within a Heritage Statement and early engagement with the council is advised. • In addition, applications for change of use will need to be supported by a detailed analysis of the potential need and impact of the proposed use on the building and its context as well as any public benefit. Buildings such as this are required elements of a sustainable community, providing social, cultural, 		

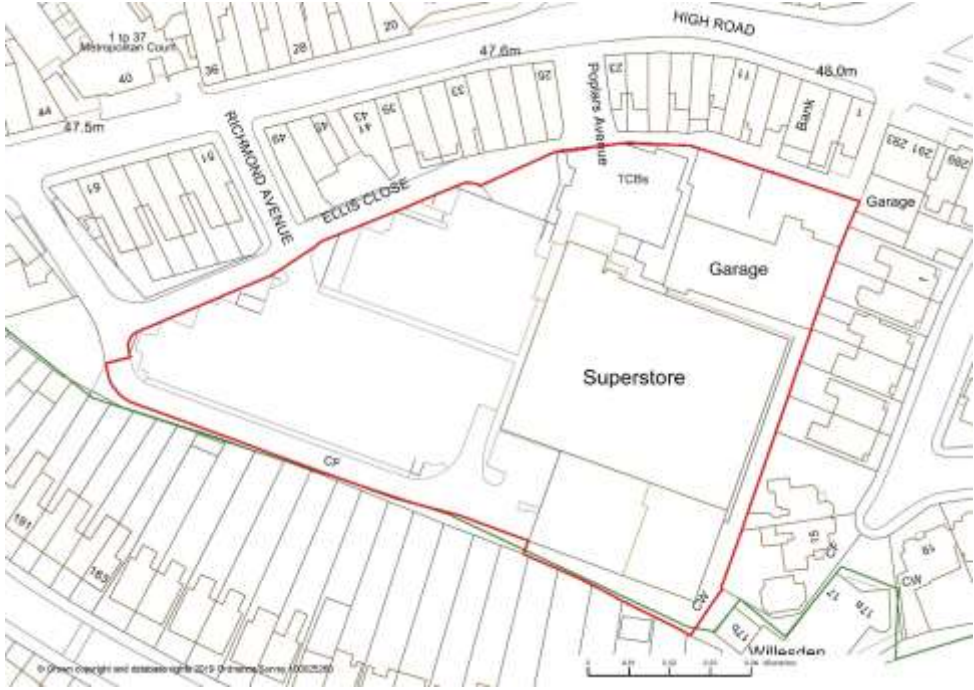
Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>environmental and economic benefits as well as regeneration. They make a major contribution to the vitality of town centres and are a significant element of the Borough's cultural infrastructure.</p> <p>The immediately adjacent carpark forms part of the get in area and access to the workshop at the rear of the Gaumont which, when back in use, would be used on a regular basis and will be essential to the long term viability of the building. Any proposals for the building and the car park must be considered with this in mind.</p> <p>Justification</p> <ul style="list-style-type: none"> • The Gaumont Cinema is a Heritage asset of national importance which has played an important role in Kilburn's history, currently At present the building is an underutilised, public asset, as only parts of the building are used by a church group • Promoting full use of the building for cultural, leisure and community uses will help safeguard its future, and allow the wider community to access the facility. • Gaumont State is located within Kilburn Town Centre, and increasing its use for cultural, leisure and community activities will contribute to the vibrancy of Kilburn Town Centre and its night time offer and help safeguard its future. 		
MM77	5.6 South East Place	BES20, page 230-231	<i>Insert Site Plan:</i>	Map missed off by publishers. To increase brevity and make consistent approach	Yes. Replace ment of health centre with commun

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			 <p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery <u>0</u>1-5 Years <u>5</u>6-10 Years 50 <u>1</u>0+ Years 50</p> <p>PTAL Rating <u>6</u>a (current and 2031 estimate)</p>	<p>across the housing trajectory, Local Plan (Policy BE8) and London Plan policies and incorporate essential infrastructure needs, reflects CCG's confirmation of no longer a health centre need, however the site can serve other social infrastructure needs.</p>	<p>ity facility.</p>

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>Planning Considerations</p> <ul style="list-style-type: none"> • As The market and units fronting the High Road form part of the primary frontage of Kilburn Major Town Centre. As such, development should maintain an active frontage along the High Road and include retail floorspace. • The market adds to the vibrancy of the centre and will is to be required to be retained and improved in accordance with the requirements of policy BE8 – Markets and Car Boot Sales. • To the south the site is bounded by Brondesbury Road, which forms part of Kilburn Conservation Area. The road comprises 2 to 3 storey brick villas built pre-1865. • Number 10 Brondesbury Road is locally listed. • The north-eastern corner of the site is located within a Site of Archaeological Importance which will require appropriate assessment and if necessary mitigation strategies prior to development. • The area benefits from High public transport accessibility levels. Kilburn High Road station (Overground) is 200m south-east and Kilburn Park stations are close (Bakerloo) 400m south of the site. The area is also served by various bus routes from 6 bus stops within the vicinity, car free development should be the starting point. • Improving accessibility and connectivity between The main access point onto the site is from Kilburn High Road and Kilburn Square via potentially reconfigured market area, and consideration of , which forms part of the A5, a busy route into Central London. There is also access to the residential areas through Brondesbury Road. • Although much of the site is hard landscaped, Kilburn Square is soft landscaped and provides amenity space for residents. • There are a number of mature trees within the square along the High Road, Brondesbury Road to the south of the site is lined with trees. 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> • A number of Areas of hard standing to the rear of the site are within flood zone 3a due to potential for surface water flooding. <u>A Flood Risk Assessment will be required.</u> • The site is Within an Air Quality Management Area, with the adjoining A5 being a major source of both air and noise pollution. As a minimum development is to be Air Quality Neutral. • A number of night time uses are concentrated within Kilburn High Road which can generate noise. The 'agent of change' principle will apply, <u>with regards to High Road night-time uses.</u> This means Development which introduces sensitive uses to an area (for example housing) will be responsible for managing and mitigating the impact from existing uses. <p>Design Principles</p> <ul style="list-style-type: none"> • <u>Comprehensive approach by the two principal landowners for Kilburn Square to be enhanced and function as a single new public square space, suitable for residents' amenity, events, and a modern market facility, as will create a focal point both for the site adjacent residential estate and Kilburn High Road. The layout and design of the square should enable its use for events.</u> • <u>Kilburn High Road frontage provides an opportunity for a comprehensive redevelopment to use land more efficiently providing space that meets modern retailing requirements and reinstate a streetscape that is more consistent with the urban design principles applied in the rest of the town centre, with active frontages should be located along Kilburn High Road and the square, with at ground floor and mixed-use development above.</u> • <u>Adjacent is Brondesbury Road, part of Kilburn Conservation Area comprising 2 to 3 storey brick villas built pre-1865 and number 10 is locally listed.</u> Development fronting the High Road should integrate well 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>with the surrounding context and consider character, setting, and the form and scale of neighbouring buildings.</p> <ul style="list-style-type: none"> Given surface water flooding and poor air quality it will be important development seeks to increase soft landscaping. There are a number of Mature trees within the square, and along the High Road, and along Brondesbury Road to the south of the site is lined with trees should where possible be retained and reinforced. Tree planting should be protected and reinforced, particularly along the A5. Development, through its layout and materials, should mitigate impacts from the A5 and nearby night time uses. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Re-provision of the market and creation of a new public square. <u>Replacement of health centre with an alternative use that meets community needs.</u> <p>Justification</p> <ul style="list-style-type: none"> The market and buildings are now dated. The layout does not make the most efficient use of the land and has poor permeability connectivity. At present Kilburn High Road Lacks of a focal point and although this site contains a wide paved area, its linear form and the fact it is bounded by the busy A5 mean that it is currently not a desirable location to spend time or hold events. Kilburn has the highest comparison goods turnover of any centre in the Borough, and has increased its market share over the past decade. The Brent Retail & Leisure Needs Study identifies <u>Kilburn as having the highest comparison goods turnover of any centre in the Borough.</u> to continue this positive momentum, and additional comparison retail floorspace should be directed to this town centre. 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> This site is a key Opportunity to meet the need for additional comparison retail floorspace to meet needs, in Kilburn Town Centre, and create a new focal point in the form of a modern public square and market facility, and -As a town centre location with good public transport accessibility, both the NPPF and London Plan policy promote intensification for mixed-use development including residential. There is scope for this to be achieved through an improved layout which makes more efficient use of the land. 		
MM78	5.6 South East Place	BES21, page 232	<p><i>Insert Site Plan:</i></p>  <p><i>Amend parts of policy to read:</i></p>	<p>Map missed off by publishers.</p> <p>To increase brevity, reflect existing use, and make consistent approach across the housing trajectory, Local Plan (Policy BT2) and London Plan policies and incorporate essential</p>	<p>Yes. Change in allocated use to remove employment.</p>

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>Existing Use Supermarket, car parking and an employment retail use.</p> <p>Allocated Use Mixed-use including housing and retail and employment uses.</p> <p>Timeframe for Delivery 0<u>1</u>-5 Years 5<u>6</u>-10 Years 25 1<u>10</u>+ Years 25</p> <p>Description of Existing Site The site consists of a large single storey Sainsbury's supermarket and large expanse of car parking. In the north east corner of the site is a vehicle repair garage fireplace and antique architectural pieces showroom and associated car park. To the north the site is bounded by rows of 3.5 storey terraced housing with ground floor commercial uses. To the south and east, the site is bounded by residential gardens. The site is accessible from Willesden High Road via Ellis Close, Richmond Avenue and Poplars Avenue. Poplars Avenue is pedestrianised and is not accessible for vehicles.</p> <p>PTAL Rating 4 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is Within Willesden District Town Centre Secondary Shopping Frontage where replacement ground floor retail frontage will be sought and is adjacent to the Willesden Town Centre Conservation Area. The 	<p>infrastructure needs.</p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<p>Sainsbury's currently represents part of Willesden Town Centres Secondary Shopping Frontage.</p> <ul style="list-style-type: none"> • The site lacks soft landscaping with the exception of four trees on site. • As with the majority of Brent the site is located Within an Air Quality Management Area. As a minimum development is to be Air Quality Neutral. • The site has a history of industrial use. The north east corner of the plot is currently a vehicle repair garage and is therefore currently industrial. Testing for contamination should be undertaken along with any necessary remediation works. • An increase in employment floorspace will be required as part of any redevelopment. • The site contains an existing employment use. The draft London Plan requires Brent to provide additional employment floorspace capacity. As such an increase in employment floorspace will be sought. • Surrounding the supermarket are small areas designated as Flood Zone 3A due to the risk of surface water flooding. A Drainage and Flood Risk Assessment should identify measures to mitigate the potential flood risk. • With a PTAL of 4, the site is located within a 10-minute walk of and Willesden Green underground station close by, car free development should be the starting point and within a 5-minute walk of numerous bus services. • The Sainsbury's supermarket is an anchor store which contributes to the vitality of the town centre. It also helps to meet the borough need for convenience retail floorspace. A supermarket should therefore be retained as part of any proposal. <p>Justification</p> <ul style="list-style-type: none"> • The site is currently Underutilised with large site in a residential area, with land used for land dedicated to car parking. It is a large site in a residential area which could provide significant uplift in housing. 		

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
			<ul style="list-style-type: none"> The site is Well serviced with a variety of stores along the High Road to the north and within close walking distance to transport facilities, making it a sustainable location for residential development. The site has low landscape value and would benefit from the introduction of greenery. This could also help mitigate surface water flood risk. <u>To protect the vitality and viability of the centre the supermarket should be retained.</u> The Sainsbury's supermarket is an anchor store which contributes to the vitality of the town centre. It also helps to meet the borough need for convenience retail floorspace. A supermarket should therefore be retained as part of any proposal. The site contains an existing employment use. The draft London Plan requires Brent to provide additional employment floorspace capacity. As such an increase in employment floorspace will be sought. <u>As a Local Employment Site, an increase in industrial floorspace will be sought as part of any redevelopment, in accordance with policy BE3 and London Plan policy E7.</u> Retention of employment floorspace in this location is consistent with the designation of Willesden as a creative quarter. This designation is informed by the Brent Workspace Study which identifies demand for workspace within Willesden. 		
MM79	5.6 South East Place	BSESA22, page 233	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Homes: 2042</p> <p>Comments: 17/0322 pending decision <u>mind ed to approve</u></p>	To reflect planning permission.	Yes. Amendm ents to site capacity.
	5.6 South East Place	BSESA25, page 233	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Homes: 5070</p> <p>Comments: <u>17/5291 allowed at appeal</u></p>	To reflect planning permission.	Yes. Amendm ents to site capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required ?
	5.6 South East Place	BSESA28, page 233	<i>Amend parts of policy to read:</i> Allocated Use: Mixed-use employment employment industrial and residential	Consistency with the London Plan.	No. Amendment for consistency only.
	5.6 South East Place	BSESA34, page 233	<i>Amend parts of policy to read:</i> Indicative Homes: Unknown 20	Estimate of capacity based on size and context.	Yes. Amendments to site capacity.
	5.6 South East Place	BSES35, page 233	<i>Amend parts of policy to read:</i> Allocated Use: Residential and industrial employment in the B use class Comments: An uplift in employment The maximum viable provision of industrial floorspace will be required as part of any redevelopment.	Consistency with the London Plan and Local Plan (Policy BE3).	Yes, potential for less industrial floorspace to be provided than currently exists.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM80	5.7 South West Place	BP7, page 241	<i>Amend part b) of 'Character, Heritage and Design' to read:</i> e) Conserving and enhancing heritage assets including the Shree Sanatan Hindu Mandir on Ealing Road and the listed buildings and gardens of Barham Park.	To provide clarity and provide consistency with Local Plan (Policy	Yes. This regards criteria D, Di, and G.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>f) Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focusing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton. and elsewhere In the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/Ealing Road, A4089 Ealing Road, A404 Watford Road buildings where around 15 metres (5 storeys) could be appropriate and Sudbury and Ealing Road town centres where buildings around 15-18 metres (5-6 storeys) could be appropriate.</p> <p>g) Creating a strong link between Wembley and Wembley Park town centres through public realm and junction improvements and new development to the east of Wembley Triangle, forming a continuous active frontage between the two centres.</p> <p><i>Amend part d) and part e) and add new part d i) to 'Homes' to read:</i></p> <p>h) <u>Minimum of 10,600 additional homes in the period to 2041 through</u> Continuing residential-led mixed-use development within <u>the Alperton Growth Area (minimum 6,800 additional homes) and the Wembley Growth Area (that also crosses into the Central Place)</u> and Alperton Growth Areas, the Ealing Road and Sudbury town centres and intensification corridors.</p> <p><u>di) Delivering a minimum of 245 new homes in the Sudbury Town Neighbourhood Plan area in the period to 2041.</u></p> <p>i) Co-locating residential uses on areas of industrial and employment land within the Alperton Growth Area,</p>	<p>BD2 and Policy BE2) and Brent's Retail and Leisure Needs Study (evidence base). Set out housing delivery for the Place, provide housing target for defined neighbourhood areas in line with national policy.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>taking advantage of areas well-served by public transport. Where alternative uses are co-located on industrial sites this will be as part of a comprehensive regeneration scheme which ensures no net loss of a net increase in industrial floorspace.</p> <p><i>Amend part g) of 'Town Centres' to read:</i></p> <ul style="list-style-type: none"> j) Protecting and enhancing the retail function of Wembley town centre by clearly defining acceptable ground floor uses and maintaining a strong retail core on the high road. k) Providing a quality, diverse retail offer in Wembley town centre by providing for an additional 4,300sqm of A3 food and drink and A4 pubs/drinking establishments floorspace particularly in secondary shopping frontages to further support an evening economy and support the centre's potential change in status to a metropolitan centre in the London hierarchy. 2,100 sqm of additional comparison retail floorspace, and 4,300² sqm of convenience retail floorspace to 2028, in addition to that already existing and consented. l) Promoting uses which enhance and diversify the cultural and commercial leisure offer, particularly those which provide 'family entertainment'. <p><i>Amend part j) of 'Employment and Skills' to read:</i></p>		

²Total combined floorspace to be delivered over the Central and South West Places.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> m) Encouraging the intensification of existing Strategic Industrial Locations and Locally Significant Industrial Sites around Alperton. n) Introducing mixed-use development to employment industrial sites around the junction of Ealing Road and Bridgewater Road. o) Increasing the supply of workspace in Wembley and Alperton including affordable workspace as set out in Policy BE3 		
MM81	5.7 South West Place	5.7.25, page 244	<p><i>Amend para 5.7.25 to read:</i></p> <p>The Sudbury <u>Town</u> Neighbourhood Plan supports development that results in the strengthening of Vale Farm as a regional centre for sports excellence. and that it identifies that improvements should not result in the loss of green space or open space, nor involve change of use and development other than for uses which support recreation, sporting and amenity use.</p>	To ensure the plan accurately reflects the content of the Sudbury Town Neighbourhood Plan 2015.	No, amendment for consistency only.
MM82	5.7 South West Place	BSWGA1, page 244	<p><i>Amend Policy to read:</i></p> <p>Alperton Growth Area's transformation as an extensive area of mixed use residential led regeneration principally focussed along the Grand Union canal will continue between Alperton and Stonebridge Park stations. The area will be a location for taller buildings at its Ealing Road and Northfields ends, with principally mid-rise in between.</p> <p>Investment in the canal and its setting on adjacent sites will enhance its role as an increasingly important environmental, recreational and movement corridor that draws the area together rather than acting as a divide.</p>	Provide consistency with London Plan, set out housing delivery in this strategic policy for the Place and update to better reflect the Open Space Sports and Recreation Study (evidence base).	Yes. Increase in housing target and inclusion of new open space requirements.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>In addition to over 6000 6,800 additional homes, Alperton will be encouraged to become an enterprise hub. This will principally be through new business and employment floorspace within those residential developments to provide a major boost to business and employment opportunities. This will deliver a new varied supply of neighbourhood friendly modern light industrial premises, studios and managed workspaces for local business, creative industries, and artists to reinvigorate the local economy.</p> <p>All developments will achieve the highest design standards and contribute positively better integrating the canal and its hinterland into Alperton into the surrounding area. Energy efficient design and renewable energy are encouraged. Development will be supported by associated additions to social infrastructure identified in the Infrastructure Delivery Plan, which will include:</p> <ul style="list-style-type: none"> • public squares and pocket parks A series of equipped play areas within new developments and open space • Creation of informal recreation, Good quality public realm along the canal and linking improved pedestrian and cycling routes; • 4 x 0.2ha Pocket park • Improvements to the quality and accessibility of existing public open spaces; • Opportunities for Food growing • New nursery facilities; • New health facilities (as part of the Northfields Industrial Estate regeneration scheme) • A new 1 hectare public open space; 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> Multi-use community centre; Roads/Junction and other public transport improvements; and Planting new trees. 		
MM83	5.7 South West Place	BSWSA1, page 248-249	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity 1200 1850</p> <p>Timeframe for Delivery 0-5 650 1,059 5-10 350 114 10+ 200 677</p> <p>PTAL Rating 3-5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The sites are within Alperton Growth Area, and have been partially allocated for development previously, albeit at much lower densities than currently proposed. Excluding the site of The Boat public house, these sites are all designated as Locally Significant Industrial Sites and therefore, in line with London Plan requirements Policy 	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.	Yes. Increase in capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>BE2</u>, there must be a minimum replacement of the existing amount of employment floorspace or 0.65 plot ratio, <u>or the existing industrial floorspace total</u>, whichever is the greater across the sites. The configuration of employment <u>industrial</u> floorspace will be agreed as part of the forthcoming masterplan process.</p> <ul style="list-style-type: none"> • <u>Developments of non-industrial uses will not be permitted on LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • <u>If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered.</u> • The site contains no recognised heritage assets, however Alperton Station is Locally Listed and any future development must take care to preserve and enhance its heritage value. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Potential noise associated with the roads and adjacent employment uses will have to be addressed in design of development. • The railway line along the northern boundary of the sites is designated as a wildlife corridor. Development and its associated should take care to protect this area from any works which would should not compromise its biodiversity and retain. There are a number of mature trees across the sites which should be retained where possible. • <u>An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.</u> • <u>Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.</u> • <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> • Parts of the site in the south are adjacent to the Grand Union canal and classified under Green Chain and 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Waterside Development Policy BGI1, where management, integration and enhancement of existing green and blue infrastructure are encouraged. The southern boundary along the Grand Union Canal will need an appropriate set back, landscaping and public access as part of a wider connection along the northern side of the canal.</p> <ul style="list-style-type: none"> • The enhancement of the existing moorings along the southern stretch of the canal should be considered in association with the Canals and Rivers Trust. In addition, developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. <p>Design Principles</p> <ul style="list-style-type: none"> • Given the height of the permitted Minavil House scheme and surrounding buildings including Peppermint Heights and residential development on the south side of the Grand Union Canal, these sites are deemed suitable to continue the cluster of tall buildings around Alperton Station in line with London Plan guidance. • Tall buildings should be centred on the junction of Ealing Road and Bridgewater Road, stepping down towards the 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>peripheries of the sites where in some cases it is likely that adjacent two storey residential properties will remain.</p> <ul style="list-style-type: none"> Alperton Station should be well connected to or integrated into new development, providing a high quality public realm/pedestrian/cyclist environment. Potential noise associated with the roads and adjacent employment uses will have to be addressed in design of development. The sites to the east of Bridgewater Road must take account of the significant noise constraints created by the adjacent railway line. The Minavil House and Alperton House site should come forward in line with principles set out as part of planning permission 16/2629 and 18/4199. Active frontages should be created where development is adjacent to a road and along the open spaces north of the canal. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Social, physical and sustainable infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site. <u>The enhancement of the existing moorings along the southern stretch of the canal should be considered in association with the Canals and Rivers Trust. In addition, developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>energy strategy set out as part of its sustainability statement.</u></p> <ul style="list-style-type: none"> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> <p>Justification</p> <ul style="list-style-type: none"> • These sites are generally low density Locally Significant Industrial Sites which have not maximised their development potential. This allocation would allow these underutilised sites to contribute to Brent's housing numbers within the designated Alperton Growth Area, as well as increasing provision of employment industrial floorspace in line with London Plan requirements. • The site's proximity to Alperton Station make it an excellent location for residential use in addition to the existing industrial and commercial activity. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> Redevelopment of the sites bordered by the Grand Union Canal will allow for a continuation of the high quality canal side development planned to the east in further sites allocated for development. 		
MM84	5.7 South West Place	BSWSA2, page 251-252	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years</p> <p>5-10 6-10 Years</p> <p>10+ 11+ Years 200</p> <p>PTAL Rating</p> <p>4 (current and 2041 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the Alperton Growth Area with a reasonable level of public transport accessibility providing and consistent with London Plan provides the opportunity for a more intensive use of the site, ideally through a vertically-mixed use development of store/supporting uses and residential above. The site is of Archaeological Importance so proposals should demonstrate impacts and detailed consideration of BHC1 towards the significance of the heritage asset and its wider context. Development should provide a detailed 	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies, incorporate essential infrastructure needs, safeguard public transport access improvements.	No. Amendments for clarity, brevity and consistency only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>analysis and justification of the potential impact of the development on the heritage asset.</p> <ul style="list-style-type: none"> • The store is in an out of centre location and trading well. There are no sequentially preferable locations available in Brent's town centres locally that could accommodate the store. Therefore, a retention of a supermarket of similar size on site would be sought. As an out of centre site, sequentially it is not the preferred location for additional retail space/town centre uses. Any such additional space will need to pass the sequential test and impact assessment. • North of the site is the Grand Union Canal that is part of the green chain and falls under waterside development BGI1. Adhering to London Plan policy, the council will encourage the enhancement of green and blue infrastructure. • An active frontage along Ealing Road would be desirable as well as positive frontages along Glacier Way and the Grand Union Canal. • The opportunity to incorporate a boater facility hub on the site should be explored with the Canal and River Trust. • Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement. • The existing petrol station if kept or removed will have to be satisfactorily addressed in terms of impacts on potential residents. • Tall buildings will be appropriate on this site, taking its cue from the scale of immediately adjacent heights. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • A small amount of the site falls under Flood zone 3a and is susceptible to surface water flooding, predominantly on highway land off Glacier Way. To the North of the site, surface water flooding risk comes from the canal. As the site is over one hectare, a site specific flood risk assessment will be required. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. • The site is located on an historical industrial site. A Preliminary Risk Assessment for contamination will be required, and if necessary remediation. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Noise associated with the continued industrial use, or intensification of employment uses on the adjacent sites, plus the operation of the supermarket will need to be addressed in the design of development. • The use of Glacier Way as a TfL bus stand will also need be taken into account. <u>This must be retained or enhanced as part of any development and early discussion with TfL London Buses on this should take place.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Ealing Road is a London Distributor road. A transport assessment for the site will be required to determine the impact that development at this site will have on the transport network. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements <p>Design Principles</p> <ul style="list-style-type: none"> • Tall buildings will be appropriate on this site, taking its cue from the scale of immediately adjacent heights. • Active frontage should be created along Ealing Road, Grand Union Canal and Glacier Way, with the Northwick Road positively addressed. Ideally, any replacement superstore will place its public entrance closer to Ealing Road, the main 'box' surrounded by smaller retail/commercial units or residential to remove the potential for dead frontage. • There may be an opportunity to realign Northwick Road to create better development parcels/place. <p>Infrastructure Requirements</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>No specific infrastructure requirements identified beyond Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> • <u>Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> • Enhancement of blue infrastructure and consideration of sustainable infrastructure during master planning and construction. 		
MM85	5.7 South West Place	BSWSA3,page 253-254	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity 335 <u>450 dwellings</u></p>	To increase brevity and make consistent approach across the housing trajectory, Local	Yes. Increased indicative capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Timeframe for Delivery</p> <p>0-5 1-5 Years 86 110</p> <p>5-10 6-10 Years 249 330</p> <p>10+ 11+ Years</p> <p>Description of Existing Site</p> <p>The site comprises a mix of retail and commercial uses including restaurants, a banqueting suite that meets the Indian community's needs for large function space associated with weddings and festivals, a gym, a community church and associated car parking. There is also a former cash & carry. To the north the site boundary runs along Ealing Road and behind new mixed-use development, with the Piccadilly Line railway forming the western boundary. To the south of the site there is a modern development comprised of taller apartment blocks completed in 2011 as part of the previous Atlip Road A4 site allocation. Alperton underground station is located directly opposite the site along with a number of small retail units along Ealing Road.</p> <p>PTAL Rating</p> <p>3-5 (current and 2031 estimate)</p> <p>Planning Considerations</p>	<p>Plan (Policy BD2) and London Plan policies, incorporate essential infrastructure needs, address impacts on public transport capacity, ensure publically accessible routes, reflect Secretary of State's London Plan modification directions.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • The site falls under the Alperton regeneration and Growth Area and is allocated for residential led mixed use development. • The site includes a place of worship which must be re-provided at least to an equivalent scale/quality in any redevelopment. • The banqueting suite at the Atlip Centre is also a facility which meets a local community need related to function spaces for Indian weddings/cultural events. These community facilities should be replaced as this contributes towards the Ealing Road niche town centre offer as set out in the vision. • In addition, Some retail/main town centre uses will require inclusion within the scheme to provide an active frontage along the Ealing Road. • <u>Given Brent's need to provide for additional industrial floorspace</u> Brent's status as a provide capacity borough, the developer needs to consider provision of workspace. • <u>Located within a Tall Buildings Zone,</u> the site is appropriate for high-density development including tall buildings in part (as shown by the existing consent for 10 storeys) but <u>however,</u> any redevelopment must provide a comfortable relationship with adjacent residential development which is likely to remain, particularly <u>and</u> the two storey properties along Sunleigh Road. • The site contains no recognised heritage assets, however Alperton Station is Locally Listed and any future 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>development must take care to preserve and enhance its heritage value.</p> <ul style="list-style-type: none"> • A road access will need to be provided to connect the development from north to the south currently served by Atlip Road. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • <u>Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.</u> • The railway line along the northern boundary of the sites is designated as a wildlife corridor. Development and associated works should take care to protect this area from any works which would not compromise its biodiversity. • Consideration of It will also need to deal satisfactorily with the noise impacts of the railway. • The area covering Atlip Road falls under Flood zone 3a and is susceptible to surface water flooding. As the site is over one hectare a site specific flood risk assessment will be required. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p> <p>Design Principles</p> <ul style="list-style-type: none"> • Building height and massing should build upon the established rhythm in this part of the regeneration in Alperton regeneration scheme, corresponding to the neighbouring buildings and stepping down towards the east of the site. • Development along Ealing Road should provide an active frontage to continue the road line of the retail units to the east of this site. • If Atlip Road is realigned, A clear and obvious inviting 'homezone' pedestrian/cycle route from Ealing Road to the canal must exist, with active frontage overlooking it. If Atlip Road is realigned it should have positive frontages addressing it. • The properties along Sunleigh Road must have defensible space/should not have rear fences along any public realm. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • The church, and community centre and banqueting hall should be re-provided as part of any future development in line with policy BSI1 Social Infrastructure and Community Facilities. <u>This should be at least to an equivalent scale/quality in any redevelopment.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> • <u>Atlip Road will form part of a continuous publicly accessible east/west walking/cycling route from Ealing Road along the northern edge of the canal running through the development sites BSWSA3/BSWSA4/BSWSA5/ BSWSA6/ BSWSA7).</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> <p>Justification</p> <ul style="list-style-type: none"> • This site is generally comprised of low density commercial and retail uses which have not maximised the development potential of the area. This allocation would allow this site to contribute to Brent’s housing numbers within the designated Alperton Growth Area, continuing development which has come forward as part of the previous Atlip Road allocation. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> The site's proximity to Alperton Station make it an excellent location for residential use. 		
MM86	5.7 South West Place	BSWSA4, page 255-256	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use</p> <p>Mixed-use residential led development incorporating some replacement workspace industrial at ground floor level and potential commercial leisure use at ground floor level to take advantage of/ enhance the canal setting.</p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 198-33</p> <p>5-10 6-10 Years 197-165</p> <p>10+ 11+ Years 197</p> <p>Description of Existing Site</p> <p>The site is comprised of low level industrial and commercial units with the Grand Union Canal to its south. The site has a low PTAL of 2-3 (2031 estimate) although this is likely to rise given the high levels of development currently proposed for the area. The site was allocated for development previously albeit at a lower density than currently proposed.</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies, incorporate essential infrastructure needs, address protected waste site, ensure publically accessible routes, reflect Secretary of State's London Plan modification directions.	Yes change to maximum viable industrial floorspace is likely to deliver less than net loss.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>PTAL Rating</p> <p>2-3 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> Two parcels within this allocation have planning permission (ref 18/0418 and 18/0320) to provide relatively low levels of development. Further <u>The site sits within Alperton Growth Area and</u> development should come forward at higher densities in line with neighbouring allocations and the wider Alperton regeneration area. The site's location adjacent to the Grand Union Canal requires development to be in conformity with policy BGI1 Green and Blue Infrastructure in Brent which requires developments adjoining the borough's Blue Ribbon network to pursue opportunities to improve public accessibility and its setting in relation to buildings and public realm. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath. <u>The site is adjacent to the Grand Union canal and classified under Green Chain and Waterside Development Policy BGI1, where management, integration and enhancement of existing green and blue infrastructure are encouraged.</u> Developers should explore the use of canal water as a low carbon energy source to heat and cool buildings 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>demonstrated through an energy strategy set out as part of its sustainability statement.</p> <ul style="list-style-type: none"> • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. • A new connecting homezone/pedestrian and cyclist street to the adjacent Atlip Road site to the west must be provided that creates a high quality direct route through site to link up with the same type of route in the adjacent Abbey Manufacturing Site Allocation. Publicly accessible walking/cycling routes through the development must be provided from Sunleigh Road and Woodside End to link to the new east/west pedestrian/cycle route, canal footbridge on Atlip Road and any new towpath/route along the northern edge of the canal across the site. • A small number of mature trees are located within the allocated area and should be retained where possible. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area • Mid-rise tall buildings will be appropriate on this site subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>massing being delivered with existing residential properties. <u>The site is within a Tall Buildings Zone where tall buildings are appropriate.</u></p> <ul style="list-style-type: none"> Given that the site is existing employment industrial land and Brent's status as a provide capacity borough, the council will require <u>the maximum viable amount of</u> no net loss of employment industrial floorspace, with re-provision probably provided on the ground floors of the new buildings and where necessary to meet capacity requirements on upper floors. <u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u> Piecemeal development of the site will not be allowed in advance of a masterplan/agreement between landowners on how the site will be developed comprehensively to provide a coherent development overall. New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity. <p>Design Principles</p> <ul style="list-style-type: none"> This site is suitable for mixed use development similar to the adjoining scheme on Atlip Road completed in 2011. Comprehensive mixed use development will be promoted 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>to make the most effective use of land and secure better development outcomes.</p> <ul style="list-style-type: none"> • Flexible light industrial/maker workspace should be provided at ground floor level creating an active frontage to routes through the site and frontage along the canal frontage where commercial leisure use to increase activity on the canal would be desirable. • The site is appropriate for Tall buildings of a mid-rise nature that should provides a satisfactory relationship in terms of scale and massing with in relation to existing adjacent residential properties that will remain should be provided. • A clear and direct appropriately landscaped home zone route that gives priority to cyclists and pedestrians should be set out to promote greater permeability/connectivity through the site for cyclists and pedestrians in particular, suppressing the desire potential for rat-running of vehicles from adjacent areas. • Development should be provide a publicly accessible landscaped set back from the canal in line with policy BGI1 Green and Blue Infrastructure. to promote a high quality landscaped publically accessible east/west route/towpath in which opportunities for access to the canal be enhanced. • <u>Publicly accessible walking/cycling routes through the development must be provided from Sunleigh Road and Woodside End to link to the new route along the northern edge of the canal across the site.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>Vehicular access will be from Sunleigh Road and Woodside End.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • A publicly accessible <u>east/west walking/cycling</u> route should be provided adjacent to the along the northern edge of the canal side as part of a wider continuous route running through the development sites BSWSA3/BSWSA4/BSWSA5/ BSWSA6/ BSWSA7. • A direct and high quality homezone route that links the site to Atlip Road and into the adjacent BSWSA5 sites, to create a continuous route through to Mount Pleasant. • <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> • <u>New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity.</u> • <u>Developers should explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u></p> <p>Justification</p> <ul style="list-style-type: none"> • This site is generally comprised of low density commercial and industrial uses which have not maximised the development potential of the area. This allocation would allow this site to contribute to Brent's housing numbers within the designated Alperton Growth Area, continuing development which has come forward on neighbouring sites and the immediate area. • The site's proximity to Alperton Station make it an excellent location for mixed residential and employment industrial use. 		
MM87	5.7 South West Place	BSWSA5, page 257-259	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use</p> <p>Mixed-use residential-led development incorporating replacement employment industrial space, small scale retailing/commercial leisure and community uses (e.g. nursery).</p> <p>Indicative Capacity</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3), London Plan policies, reflect Secretary of	Yes. Decrease in indicative capacity and changed reference from employment to industrial, and amended approach to

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>590 490</p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 300 14</p> <p>5-10 6-10 Years 290 286</p> <p>10+ 11+ Years 190</p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> • The site sits within Alperton Growth Area and forms part of the wider regeneration scheme outlined in the Alperton Masterplan Supplementary Planning Document. The site was allocated for development previously albeit at a lower density than currently proposed.^{MM?} • The site has a low PTAL of 2-3 (2031 estimate) although this is likely to rise given the high levels of development currently proposed for the wider area • The north west corner of the site is vacant land and the rest of the site forms a large industrial estate comprising around 60 industrial/warehouse units, predominantly car repair businesses. The site extends from the northern towpath of the Grand Union Canal in the south to the rear garden boundaries of houses fronting Mount Pleasant and Woodside Close in the north and east. The site also bounds the under-construction Abbey Wharf residential development to the east and residential properties fronting Woodside Place and Woodside End to the west. 	State's London Plan modification directions, ensure accessible routes and reflect revised Use Classes.	reprovision of employment/ industrial land.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> The site is also in the Alperton Housing Zone. The site slopes from the north to the south. <p>PTAL Rating 2-3 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> <u>The site is within a Tall Buildings Zone where tall buildings are appropriate.</u> The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. The site's location adjacent to the Grand Union Canal requires development to be in conformity with policy BG11 Green and Blue Infrastructure in Brent which requires developments adjoining the borough's Blue Ribbon network to pursue opportunities to improve public accessibility and its setting in relation to buildings and public realm. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath. A small part of the site to the south falls under Flood zone 3a and is susceptible to surface water flooding. As the site is 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>over one hectare a site specific flood risk assessment will be required.</p> <ul style="list-style-type: none"> • Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. • A new connecting homezone/pedestrian and cyclist street to the adjacent BSWSA4 site to the west must be provided that creates a high quality direct route through the site to link to Mount Pleasant on the east. Publicly accessible walking/cycling routes through the development must be provided from Woodside Close and Woodside End to link to the new east/west pedestrian/cycle route, canal footbridge on Atlip Road and any new towpath/route along the northern edge of the canal across the site that links BSWSA3 and the adjacent Abbey Wharf development to the west. • Given that the site is existing employment industrial land and the identified need within the Brent's status as a provide capacity borough, some maximum viable re-provision of employment industrial floorspace along the ground floors of the new buildings will be required as well 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>as other potential uses such as small scale retail, commercial leisure or community uses (e.g. nursery).</p> <ul style="list-style-type: none"> Given the size of the site, development should come forward as part of a comprehensive masterplan-led approach should demonstrate and individual schemes which would compromise the most efficient land use of the site will be refused. New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity. <u>A Thames Water Sewage Pumping Station is located within the proposed development boundary and this is contrary to best practice set out in Sewers for Adoption (7th edition). The development should make suitable arrangements to address this matter satisfactorily and dependent on solutions devised, future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise.</u> <p>Design Principles</p> <ul style="list-style-type: none"> The site is appropriate for higher density and tall buildings of a mid-rise nature subject to detailed design analysis. that It should provides a satisfactory relationship in terms of scale and massing in relation to existing residential properties that will remain should be provided. Buildings 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>closer to the edges of the site should be of a complementary height to the existing suburban homes to which the site adjoin whilst buildings further from the edges could be of supported with a greater mid-rise massing.</p> <ul style="list-style-type: none"> • Development coming forward should be denser than the surrounding suburban character. • It is suitable for tall buildings of a mid-rise height, that sits well subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing. This should be delivered in context with the residential properties in the neighbouring Abbey Wharf development which rises to six storeys and the surrounding two-storey residential properties elsewhere that are likely to remain. The proposal should seek a housing mix of private and affordable and appropriate provision of family units. The development should demonstrate exemplar design quality. • The existing Woodside Place and Woodside End should be extended into the site providing Homezone type through roads that prioritise pedestrian and cyclist movements. A new connecting Homezone/pedestrian and cyclist street should be provided to the adjacent BSWSA2 site that forms a continuous link between the Atlip Road site to the west and Mount Pleasant. Pedestrian and cycle routes should also link to any new towpath/route that is also provided along the northern edge of the canal across the site. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Affordable workspace and flexible light industrial/maker workspace, plus potential <u>small-scale retail and community</u> uses A1 or D1 uses should be provided at ground floor level creating an active frontage to routes through the site and frontage along the canal where commercial leisure use to increase activity on the canal would be desirable. • Development should mitigate the transport impacts of the development clear and direct appropriately landscaped home zone route/routes that gives priority to cyclists and pedestrians should be set out to promote greater permeability/connectivity through the site for cyclists and pedestrians in particular, suppressing the desire potential for rat-running of vehicles from adjacent streets/areas. • Development should be <u>provide a publicly accessible landscaped</u> set back from the canal <u>in line with policy BGI1 Green and Blue Infrastructure</u>. to promote a high quality landscaped publically accessible east/west route/towpath in which opportunities for access to the canal be enhanced. • <u>Vehicular access will be from Mount Pleasant and Woodside End.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • A publicly accessible <u>east/west walking/cycling</u> route <u>should be provided</u> adjacent to the <u>along the northern edge of</u> the canal side <u>as part of a wider continuous</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>route running through the development sites BSWSA3/BSWSA4/BSWSA5/ BSWSA6/ BSWSA7.</u></p> <ul style="list-style-type: none"> • A direct and high quality homezone route that links the site to Atlip Road to create a continuous route <u>from Woodside End</u> through to Mount Pleasant. • <u>Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</u> • <u>New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity.</u> • Consideration of blue/green and sustainable infrastructure in masterplanning and during development. • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> • <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<u>cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u>		
MM88	5.7 South West Place	BSWSA6, page 260-261	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use Mixed-use residential-led development incorporating employment industrial uses.</p> <p>Indicative Capacity 135 147</p> <p>Timeframe for Delivery 0-5 1-5 Years 135 33 5-10 6-10 Years 104 10+ 11+ Years</p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> The site forms an industrial estate comprising various warehouse units and office buildings of poor quality. Beresford Avenue runs along the northern boundary of the site with the Grand Union Canal forming the southern boundary. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3 and Policy BD2) and London Plan policies, reflects Secretary of State's London Plan modification directions, ensure publically accessible routes, reflect revised Use Classes and incorporate essential infrastructure needs.	Yes. Amendments to site capacity, change in industrial floorspace requirement which could reduce amount of re-provision.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> The site is adjacent to the under-construction Abbey Wharf residential development to the west and meets the forthcoming Northfields development to the east. Part of the site has approved planning application 18/0752 <p>Planning History</p> <ul style="list-style-type: none"> Planning application 18/0752 for the demolition of existing buildings at Afrex House, and redevelopment to provide a residential development of 3-5 storeys for 31 residential units (9 x 1bed, 18 x 2 bed, 4 x 3 bed), creation of public realm and alterations, landscaped amenity space, car and cycle parking and all associated works. Off-site contribution made towards affordable workspace. Residential prior approvals in the Liberty Centre <p>PTAL Rating</p> <p>2 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site sits within Alperton regeneration and Growth Area and forms part of the wider regeneration scheme outlined in the Alperton Masterplan Supplementary Planning Document. The site was allocated for development previously albeit at a lower density than currently proposed. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>The site is within a Tall Buildings Zone where tall buildings are appropriate.</u> • Given that the site is an existing employment industrial land and the identified need within the Brent's status as a provide capacity borough, the maximum viable re-provision of employment industrial floorspace along the ground floors of the new buildings will be required. • The site has a low PTAL of 2 (2031 estimate) although this is likely to rise given the high levels of development currently proposed for the wider area. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • The site's location adjacent to the Grand Union Canal requires development to be in conformity with policy BGI1 Green and Blue Infrastructure in Brent which requires developments adjoining the borough's Blue Ribbon network to pursue opportunities to improve public accessibility and its setting in relation to buildings and public realm. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath. • Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. • A new connecting towpath/route along the northern edge of the canal across the site that links to BSWSA5 and the adjacent Northfields. • New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity. <p>Design Principles</p> <ul style="list-style-type: none"> • Development coming forward should be denser than the surrounding suburban character and is suitable tall buildings of a mid-rise height (potentially around 6 storeys), subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing being delivered with the surrounding two storey residential properties that are likely to remain on Beresford Avenue. • Flexible light industrial/maker workspace, plus potential retail/commercial, leisure or community A1 or D1 uses should be provided at ground floor level. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Proposals should seek to introduce active frontages along Beresford Avenue and the canalside. • Development should be provide an appropriate set back that is publicly accessible and landscaped set back from the along the canal to promote a high quality landscaped publically accessible east/west route/towpath in which opportunities for access to the canal be enhanced. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • A publicly accessible east/west walking/cycling route should be provided adjacent to the along the northern edge of the canal side as part of a wider continuous route running through the development sites BSWSA3/BSWSA4/BSWSA5/ BSWSA6/ BSWSA7. • <u>New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity.</u> • Green/blue and sustainable infrastructure should be part of the development process and the development. • <u>Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</u></p> <ul style="list-style-type: none"> • <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> 		
MM89	5.7 South West Place	BSWSA7, page 262-263	<p><i>Amend parts of policy to read:</i></p> <p>Existing Use</p> <p><u>Mixed use</u> (Industrial <u>with residential under construction</u>)</p> <p>Allocated Use</p> <p>Mixed-use residential-led scheme</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE2) and London Plan policies, reflects Secretary of State's London Plan modification	Yes. Increased capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Indicative Capacity 2900 3,030 new homes</p> <p>Timeframe for Delivery 0-5 752 1-5 Years 400 5-10 750 6-10 Years 974 10+ 1398 11+ Years 2,056</p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> The site is located to the south of Beresford Avenue and north of the A406 North Circular Road at the east of Alperton. The Grand Union Canal runs to the south western edge of the site, and the River Brent runs through the site, dividing it into two parcels. The site has a total area of 9.16ha, The majority of the site which is to the north of the River Brent (8.1ha), while the smaller southern part has an area of 1.06ha. The majority of the site (with the exception of a small area at the north-west) smaller southern part (1.06ha) of the site is part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan. The north-west part was formerly that is not SIL land is a non-designated Local Employment Site. There are no conservation areas or listed buildings within or adjacent to the application site. The nearest listed building 	<p>directions, update in accordance with extant permission, provide clarity in line with TfL Spatial Planning, ensure publically accessible routes and incorporate essential infrastructure needs.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>to the site is the Grade II listed "Brent Viaduct" over the North Circular Road.</p> <ul style="list-style-type: none"> The site comprises brownfield land the majority of which was formerly in use as an industrial estate, most recently accommodating a range of low density uses such as car workshops, car dealers, storage, and industrial uses. Much of the site has previously been cleared (and used as open air storage) and comprises areas of hardstanding, although there are some vacant predominantly single and two storey commercial buildings to the centre and western part of the site, and Three industrial units remain along Beresford Avenue and are currently occupied under different ownership. There is also a temporary information centre with associated parking that is accessed from Beresford Avenue towards the west of the site. Stonebridge Park station is approximately a 1km walk along Beresford Avenue and the Old North Circular Road to the north east of the site and Alperton Underground station is approximately a 1.5km walk along Mount Pleasant and Ealing Road to the west, and there are local bus stops on Beresford Avenue and the North Circular Road. <p>Planning History</p> <ul style="list-style-type: none"> Approved hybrid planning permission application 18/0321 is a hybrid planning application as amended by permission 19/2732 for the comprehensive redevelopment of the former Northfields industrial estate. The scheme proposes demolition of all existing buildings 		

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			<p>on site and the delivery of a mixed-use development including 2,900 3,030 homes, around 2,300sqm commercial floorspace, a minimum of 17,581sqm and up to 19,000sqm employment floorspace and 1,610sqm community and assembly and leisure floorspace (use classes B1a, B1c and B8), up to 2,900sqm community and assembly and leisure floorspace (uses classes D1 and D2), an energy centre, public and private open space, new routes and public access along the River Brent and Grand Union Canal, parking and cycle provision and new site access and ancillary infrastructure.</p> <p>PTAL Rating 0-3 (current and 2031 estimate). May be revised in light of new development</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> To the south of the site is the boundary of the Old Oak and Park Royal Opportunity Area identified by the London Plan and its respective Planning Framework SPG. South of the site is categorised as Flood zone 3a and 3b and susceptible to surface water and fluvial and tidal flooding. As the site is over one hectare a site specific flood risk assessment will be required. Parts of site adjacent to the Grand Union and River Brent are classified under waterside development Policy BGI1 where enhancement and use of Blue Ribbon Network are 		

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			<p>encouraged. Grade II SINC River Brent West of Stonebridge forms the wildlife corridor. East and South of the site is bordered by the green chain where Policy BGI1 applies. The developers need to take into consideration the biodiversity and its recreational function that are important contributing factors to health and well-being of the community. The planning permission includes riverside meadows and semi-naturalisation.</p> <ul style="list-style-type: none"> • Should the opportunity arise through any revisit of the planning permission then the Environment Agency has identified the need for potential for a fish easement of the river weir to be considered. • Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement. • The site is located within an Air Quality Management Area. Due to the North Circular passing south of the site, development at this site should be air quality positive as it falls under the Growth Area. Noise associated with the adjoining roads and continued industrial/employment uses south of the site will need to be addressed in the design of the development. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>the development creating identified additional capacity requirements.</p> <ul style="list-style-type: none"> Consistent with planning permission 18/0321 due to the site's historic SIL designation a minimum of 17,581 sq.m. of industrial employment floorspace of the typology and affordability associated with that planning permission must be re-provided as part of the development. Due to Brent's identified need classification as a 'provide capacity' borough, should the opportunity arise, for example through co-location north of the river Brent or through intensification to the south, greater provision of industrial floorspace will be supported. <p>Risks</p> <ul style="list-style-type: none"> The development will result in increased use of the road network by vehicles, cyclists and pedestrians. However, the scheme includes improvements to Beresford Avenue and the route to Stonebridge Park Station. The impact on the road network has been assessed by Brent and TfL, who consider the proposed Transport Assessment to be acceptable, subject to agreed mitigation measures. Delivery timescales dependent on market appetite. Potential need for Compulsory Purchase Order of later phases to ensure delivery of site not owned by Berkley Homes. <p>Design Principles</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • High quality public realm with street planting to be delivered in early phases of the masterplan. • East-west green pedestrian and cycle spine connecting new development to existing urban areas and Stonebridge park station, the canal and Alperton. • It should cater to resident’s needs by providing local amenities and facilities such as shops, cafés and restaurants, and community centre. A community centre is important to involve the local community. • Active frontage on ground floor. • Designing a cohesive residential neighbourhood with a variety of building typologies ensuring permeability to existing streets. • Opening up the canal with appropriate setback and landscaping. Improved connections and new routes and carriageway widening. • Design should respond to the various environments around the site, from housing in the north to large industrial units and the North circular in the south. It should encourage footfall to and through the site from the wider area <u>through appropriate set back/ improved connections/ new routes/carriageway widening and publicly accessible landscaped set back from the canal in line with policy BGI1 Green and Blue Infrastructure.</u> • The scale and massing should be sympathetic to existing heights in the surrounding context with lower building heights closer to Beresford Avenue. Tall buildings are 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>appropriate on this site consistent with the heights parameters established by planning permission 18/0321 (as amended by application 19/2732).</u> Given the scale of the site, it can create a new building height character.</p> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • The development includes a community facility, children’s nursery and health clinic where this has support from the CCG which would provide services to both the new and existing communities. In addition, significant contributions would be secured through the Community Infrastructure Levy. Brent CCG requires a healthcare facility of circa 800sqm fitted out and to be delivered prior to first occupation of the first 600 units across the development. This facility should be located to the west of the site in line with its requirements. • Improvements to Beresford Avenue and the link to Stonebridge Park station would improve pedestrian and cycle facilities and safety, including crossing facilities. • <u>A publicly accessible east/west walking/cycling route should be provided adjacent to the along the northern edge of the canal side as part of a wider continuous route running through the development sites BSWSA3/ BSWSA4/ BSWSA5/ BSWSA6/ BSWSA7.</u> • <u>Contributions to improve Beresford Avenue, the bus network, Stonebridge Park station and surrounding</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>walking/cycling routes to mitigate the impact of the development on the surrounding movement network.</u></p> <ul style="list-style-type: none"> • <u>Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> <p>Justification</p> <ul style="list-style-type: none"> • The approved scheme seeks to provide for the redevelopment of this industrial site with a high density, residential-led mixed-use development. It will provide 2,900 3030 homes, industrial employment floorspace, community, retail and leisure facilities and includes both a health centre and an energy centre. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> To support the incoming residents and workers, and to enhance the wider community the proposal includes improved pedestrian, cycling and vehicular connections (including improved access to public transport); publicly accessible spaces (including the provision of level access), will open up the Grand Union Canal, and River Brent to the public; and provide a range of green spaces, open spaces and formal/informal play areas. 		
MM90	5.7 South West Place	BSWSA8, page 265-266	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 263 310</p> <p>5-10 6-10 Years 160 113</p> <p>10+ 11+ Years 237 227</p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> The site forms part of Wembley Regeneration and Growth Area and falls within Wembley town centre boundary. It was formerly a long term allocation relating to a larger site in the Wembley Area Action Plan (WAAP). Since then Westernmost plot has come forward for is the residential-led development known as Chesterfield House. The developable site area has been scaled back from the previous allocation due to lack of viability of building over railway tracks. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies, reflects use classes changes, provide clarity in line with TfL Spatial Planning and incorporate essential infrastructure needs.	Yes. The change to the criterion for the amount of replacement employment floorspace may result in less than is existing.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> The current site forms the northern side of Wembley High Road between Wembley Triangle to the east and the Chesterfield House development to the west. The site extends up to the southern edge of the Chiltern Line and is located in a prime position between the emerging Wembley Park development and Wembley town centre. Buildings along the High Road range from two and three storey units with retail at ground floor level and residential above to taller commercial units opposite the former Copland School. Chesterfield House rises in part to 26 storeys. <p>Planning History</p> <p>Planning permission (application ref: 18/3111) mined to approve subject to signing of S106 obligation March 2019 for the erection of 2 residential blocks (17 and 19 storeys) connected at ground floor level comprising 256 self-contained apartments alongside 166sqm of flexible workspace.</p> <p>PTAL Rating</p> <p>5-6a (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> <u>The site falls within the Tall Building Zone so is appropriate for tall buildings.</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • <u>A key aspect of the development of the High Road area is maintaining viability and vitality of Wembley town centre.</u> • The site contains a Site of Archaeological Importance, the former Wembley Hill Farm. Development should provide a detailed analysis and justification of the potential impact of the development on the heritage asset. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • The land adjacent to the Chiltern Line railway is designated as a Wildlife Corridor and a Grade I Site of Importance for Nature Conservation. The site has good habitat connectivity and provides a mature habitat within the suburban landscape and The role of the wildlife corridors should be protected from development should not which would compromise its biodiversity or recreational function. • <u>Development close to rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.</u> • This site is in an area where the night time economy is encouraged to expand. Development should take account of this and create flexible space where possible. • Commercial development complementary to the role of the town centre should be re-provided in active frontages along the Wembley High Road. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Given the identified need within the Brent's status as a provide capacity borough, the Council will seek maximum viable no net loss of employment floorspace reprovision, existing industrial should be reprovided as and encourage to maximise its provision suitable for B1 (c), B8 and B2 use. research and development/light industrial/general industrial/storage or distribution. • The potential to create a secondary pedestrian street/continuous public realm along the rear of the High Road from Chesterfield House to Ecclestone Place. • Small portion of the site is categorised as Flood zone 3a and susceptible to surface water and fluvial and tidal flooding. As the site is over one hectare a site specific flood risk assessment will be required. • Landowners and site developers are encouraged to work together to ensure masterplan-led approach delivery as this is more likely to happen. Where the timing of delivery of a comprehensive scheme consistent with policy is adversely affected by lack of co-operation, consistent with its need to deliver timely outputs to meet the Plan's targets, the council will consider the use of compulsory purchase if required. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>the development creating identified additional capacity requirements.</p> <p>Design Principles</p> <ul style="list-style-type: none"> A key aspect of the development of the High Road area is maintaining viability and vitality of Wembley town centre. Development should support these objectives and will need to be in keeping with providing improved public realm and pedestrian access through this area. Building height and massing should build upon the established rhythm along this part of Wembley High Road, corresponding to the neighbouring Chesterfield House and stepping down towards the east of the site. Density should reflect the site's high PTAL. <u>The potential exists to create a secondary pedestrian street/continuous public realm along the rear of the High Road from Chesterfield House to Ecclestone Place.</u> The ground floor on the High Road frontage should contain active frontage of main town centre uses between Wembley Triangle and the retail units to the west. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Developers should give consideration to Green and sustainable infrastructure in master planning stage. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the</u> 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u></p>		
MM91	5.7 South West Place	BSWSA9, page 267 -268	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 250</p> <p>5-10 6-10 Years</p> <p>10+ 11+ Years</p> <p>Description of Existing Site</p> <p>The site sits on the south side of Wembley High Road and a cleared site that was formerly Ark Elvin Academy (former Copland School). It is adjacent to the former Brent House site, which is currently under construction to provide recently developed for 248 new homes with flexible commercial space at ground floor. To the south of the site sits the newly built Ark Elvin Academy, while</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.	No. Amendments for clarity, brevity, and consistency only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>to the east and west Wembley Park and Wembley town centres are a short walk away.</p> <p>Planning History Previously allocated for development in the Wembley Area Action Plan None</p> <p>PTAL Rating 6a (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is within the defined Wembley town centre boundary and was previously identified as an opportunity site that is suitable for redevelopment and sensitive to tall buildings within the Wembley Area Action Plan (WAAP). and provides the opportunity to introduce an active frontage that has been missing along this part of the town centre must be created to the along northern edge of the site along the High Road. • The high PTAL provides the opportunity for higher density development. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • The site contains a Site of Archaeological Importance, the former Wembley House. Development should accord with policy BHC1 Brent's Heritage Assets and provide a detailed analysis and justification of the potential impact of the development on the heritage asset. • Vehicular access to the site will be from Cecil Avenue. • A London Plane subject to Tree Preservation Order exists on the north eastern side of the site. Developers should have regard of existing verges and tree stock on site. • The site is adjacent to a secondary school, so will need to ensure that its operation as an effective place for education is not compromised. • The inclusion of community use floorspace that would otherwise be provided through the redevelopment of the former Wembley Youth Centre and Dennis Jackson Centre would create a more useable community space and increase housing capacity on that site. • A very small portion of the site is categorised as Flood zone 3a and susceptible to surface water. Any development on site should consider mitigation of surface water flood. • Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Design Principles</p> <ul style="list-style-type: none"> • The site is suitable for tall buildings, but of a mid-range height that <u>Building heights should</u> mediate between the development of the former Brent House (10 storeys) and the hotel across Cecil Avenue (7-8 storeys). Taking account of the topography and scale of development along Cecil Avenue towards the rear of the site, development should step down southwards. • The ground floor on the High Road frontage should contain a continuous active frontage of main town centre uses to continue the road line between the former Brent House development and the retail units to the west. Development along Cecil Avenue must positively address the street and entrance to the Ark Elvin school, whilst to the east should face outwards along the school access route from the High Road. • <u>Vehicular/servicing access to the site will be from Cecil Avenue and</u> safe access to the Ark Elvin Academy along Cecil Avenue. • Sufficient space should be provided along the High Road to allow street or on site tree planting to enhance the public realm on this part of the street. • Servicing access should be off Cecil Avenue. <p>Infrastructure Requirements</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • No specific infrastructure requirements identified. • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> • <u>Consideration should be given to the inclusion of community use floorspace that would otherwise be provided through the redevelopment of the former Wembley Youth Centre and Dennis Jackson Centre. This would create a more useable community space and increase housing capacity on that site.</u> 		
MM92	5.7 South West Place	BSWSA10, page 269-270	<p><i>Amend policy name:</i> BSWA10 <u>BSWSA10</u> Elm Road</p> <p><i>Amend parts of policy to read:</i></p> <p>Existing Use</p>	Correct policy name reference, increase brevity and make consistent approach across the housing trajectory, Local	Yes. Industrial floorspace minimum requirements amended and reference to water

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Commercial use, hotel, parking, vehicle repair garage, residential, mixed-use residential, employment, church</p> <p>Allocated Use</p> <p>Mixed-use town centre use within town centre boundary, Mixed used residential led development, Hotel and supporting community facilities</p> <p>Indicative Capacity</p> <p>400</p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 200</p> <p>5-10 6-10 Years 200 400</p> <p>10+ 11+ Years</p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> Part of the site is within the Wembley town centre boundary comprising of comprises a large format retail unit of Primark and Pound store. The site runs along the side street St. John's Road with mixed use and small retail parade, a large car park and car repair garage. 	<p>Plan (Policy BE3) and London Plan policies and incorporate essential infrastructure needs.</p>	<p>infrastructure requirements.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Towards the east is the Spiritualist church and parallel to the High Road is Elm Road with building stock of 2-3 terraced houses and a three storey Euro Hotel. • North of the site is bounded by Grade I Chiltern Line /wildlife corridor. Wembley Central station and bus stops are less than 200m from the site. <p>PTAL Rating</p> <p>PTAL 4-6a (current!) increasing to 5-6a by (2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site sits within the wider Wembley Growth Area and Wembley regeneration. Part of the site on Wembley High Road falls within the town centre boundary with primary and secondary shopping frontage. The An active frontage of main town centre uses will have to be maintained. As the site borders the Wembley High Road, the developer should carry out a viability and vitality assessment for provision of mixed use suitable for secondary frontage. The High Road frontage should contain main town centre uses. • The approved aparthotel redevelopment will demolish the exiting Euro Hotel. The site contains a church and any future development of this must take care to provide accessible replacement community facilities. • As Brent is a provide capacity borough in the London Plan, Given the identified need within the borough, the loss of the garage means that employment maximum viable 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>industrial floorspace use should be re-provided through a net increase in employment industrial floor space.</p> <ul style="list-style-type: none"> • The site is bordered in the west and north by SINC Grade I Chiltern railway line linking a number of wildlife sites. Development should adhere to the London Plan policies and Brent's Policy BGI1 that sets a local requirement for the protection and enhancement of wildlife corridor. • There are a number of trees across the site which should be retained where possible. • The site is within an Air Quality Management Area so development will need to be air quality positive given it is within the Growth Area. • PTAL is high so parking provision should be minimal with consideration given to the signed cycle route. St. John's Road should remain a high quality road to connect traffic. • The development needs to deal adequately with the noise impacts of the railways. • Given the size of the site and its multiple ownership, development should come forward as part of a comprehensive masterplan and individual schemes which would compromise the most efficient land use of the site will be refused. • Parts of the site is flood zone 3a and susceptible to surface water flooding, predominantly adjacent to the railway tracks. A site specific flood risk assessment will be required ensuring highest feasible environmental standards. <p>Design Principles</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> • Development coming forward should provide active frontage along all publicly visible areas. • <u>Density should be reflective of the site's high PTAL.</u> Along the High Road, height should relate to adjacent heritage buildings <u>and reflect the character of the area.</u> The rest of the site is suitable for tall buildings of a mid-rise height of 5-6 storey to mediate a satisfactory relationship of scale and massing already existing in the surroundings and take into account the topography. • The hotel development should positively address the street and should be designed in line with principles set out in planning application 18/4063. • The developer should provide significant new public public space, maintain pedestrian access through the site and high-quality public realm to encourage use throughout the day. • The developer should benefit from the site's high PTAL. • Proposals should seek to retain existing road network with frontage along the site. • Appropriate setback will be encouraged to balance the protection and enhancement of the wildlife corridor north of the site. • The existing tree stock of mature trees should be retained and positively addressed by any proposed building. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Accessible community facilities should replace the church, high quality route on St. John's Road with pedestrian and cycle facilities. Consideration of sustainable infrastructure. 		

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			<ul style="list-style-type: none"> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> <p>Justification</p> <ul style="list-style-type: none"> • This site is included in the Wembley Growth Area. It is generally comprised of low density commercial use which has not maximised the development potential of the area. • This allocation will allow the site to contribute towards Brent's housing numbers, community facilities, retail and employment floor space. New developments have come forward on neighbouring sites. • The site's excellent PTAL and its close proximity to Wembley Central Station, bus routes and High Road make it a good location for residential and employment use. 		
MM93	5.7 South West Place	BSWSA 11, page 271	<p><i>Amend 'comments' of the policy to read:</i></p> <p>Comments Part of Former WAAP W4, so principle of development considered acceptable. Suburban scale development.</p>	Clarity	No.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
	5.7 South West Place	BSWSA 12, page 271	<p><i>Amend parts of policy to read:</i></p> <p>Allocated use Residential/commercial/employment (Business Use Class)</p> <p>Indicative homes 24 22</p> <p>Comments Ground floor commercial/ employment-use maximised, with upper storeys residential</p>	To provide clarity following changes to the Use Classes Order, make consistent approach across the housing trajectory and reflect town centre frontage flexibilities.	Yes. Amendments to site capacity.
	5.7 South West Place	BSWSA 15, page 271	<p><i>Amend parts of policy to read:</i></p> <p>Address Employment Land on Heather Park Drive</p> <p>Allocated use Residential/employment industrial use</p> <p>Indicative homes 28 36</p>	Consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies.	Yes. Amendments to site capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			Comments Mixed use residential with maximum replacement employment light industrial, general industrial or storage and distribution floorspace.		
	5.7 South West Place	BSWSA16, page 271	<i>Amend part of policy to read:</i> Indicative homes 80-120	To match dwelling numbers in housing trajectory.	Yes. Amendments to site capacity.
	5.7 South West Place	BSWSA 17, page 271	<i>Amend part of policy to read:</i> Indicative homes 150-170	To match dwelling numbers in housing trajectory.	Yes. Amendments to site capacity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM94	6.1 Design	BD2, page 276	<i>Amend part of the policy to read:</i> A tall building is one that is more than 6 metres above the general prevailing heights of the surrounding area or more 30 metres in height	To be consistent with London Plan Policy D9.	Yes. Change to definition of tall building and the areas they are

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
		6.1.13-6.1.22	<p>Tall buildings are directed to the locations shown on the policies map in Tall Building Zones, intensification corridors, town centres and site allocations.</p> <p>In Tall Buildings Zones heights should be consistent with the general building heights shown on the policies map, stepping down towards the Zone's edge.</p> <p>In intensification corridors and town centres outside conservation areas and areas of distinctive residential character developments of a general building height of 15 metres above ground level could be acceptable, with opportunities to go higher at strategic points in town centres.</p> <p>Elsewhere tall buildings not identified in site allocations will only be permitted where they are:</p> <ul style="list-style-type: none"> a) of civic or cultural importance; or b) on sites of a sufficient size to successfully create a new character area while responding positively to the surrounding character and stepping down towards the site edges. <p>In all cases the tall buildings must be shown to be positive additions to the skyline that would enhance the overall character of the area. They should be of exceptional design quality, consistent with London Plan Policy requirements in showing how they positively address their visual, functional, environmental and cumulative impacts.</p>		appropriate for.

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			<p>6.1.13 Height is only one element of a development when considering its acceptability and whether it is of good design. Nevertheless, it is a significant one in terms of increasing the visibility of a development and its potential wider impact on an area's character. London Plan Policy D89 requires <u>identifies that</u> the Brent Local Plan to <u>should</u> provide a definition of a tall building and identify areas where tall buildings are acceptable. The council has done this in a number of different types of location taking account of factors such as those identified in D89 and other London Plan policies D1 London's Form, Character and Capacity for Growth, D24 Delivering Good Design and D46 Housing Quality and Standards, including Table 3.2.</p> <p>6.1.14 The Local Plan policies map identifies Tall Building Zones which will each be able to accommodate differing scales of tall buildings including those of 30 metres or more. (A residential tall building typically has a floor to floor distance of around 3 metres. So a 30 metre residential building would typically be approximately 10 storeys in height). It sets out the general building heights that would be appropriate in the Zones. This has been based on extensive analysis consistent with London Plan Policy D24 criteria a, b and c, as set out in Brent's Tall Buildings Strategy 2019. This includes factors such as a consideration of Brent's prevailing character, a desire to create clusters of tall buildings rather than standalone ones, and concentrating the densest development in areas with good public transport accessibility such as growth areas, on-site allocations and other areas of intensification such as principal movement corridors and town centres.</p>		

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			<p>6.1.15 Any reference within any place, site specific or design policy in this plan to number of storeys is for residential storeys. Proposals for commercial premises should be consistent with the parameters set by the height in metres for the identified number of residential storeys. The heights identified for the Tall Buildings Zones, town centres and site allocations are based on a high level of analysis, rather than in many cases considering a detailed building design. They indicate the heights likely to be generally acceptable to the council. <u>This does not mean that all buildings up to these heights are automatically acceptable. Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location.</u> There might however also be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.</p> <p>6.1.16 Within the areas identified <u>there should be variety in heights to add to visual interest to the skyline.</u> Whilst there will need to be a progressive stepping down of buildings to the edge of the tall buildings zone, <u>to respect the existing lower scale character of adjacent areas, this can be subtle and incorporate variety of building heights, it does not have to be a strictly linear progression.</u>Exceptions to stepping down will be where longer term (post 2041) higher density intensification is likely to occur, for example east beyond the current Wembley Growth Area.</p> <p>6.1.17 In town centres (outside conservation areas and areas of distinctive character) and intensification corridors <u>outside conservation areas and areas of distinctive residential character,</u> to support increased density to deliver a significant number of new</p>		

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			<p>homes, well designed taller buildings (compared to existing heights) are likely to be supported. Typically, these areas have reasonably good access to public transport and a range of services/facilities which could be better supported with increased patronage of new building occupants. The intensification corridors are main (A) roads where public transport accessibility level is 3 or above, and where the width of the street indicated by the distance between properties front to front (<u>typically, but not exclusively 22.5 metres</u>) and <u>space/relationship with properties to the rear</u> indicate scope for increase in height. The character of these places is such that the significant height associated with Tall Building Zones is not considered appropriate in these locations through the work that has been done to date in supporting the Local Plan, including the Tall Buildings Strategy. Nevertheless, taller buildings, typically of around 15 metres (5 storeys), with the opportunity to go higher at strategic points in town centres (e.g. locations adjacent to stations) could be appropriate. Buildings should in these locations reduce in scale towards adjacent properties on side streets.</p> <p><u>6.1.18</u> Similar to the Tall Buildings Zones, whilst town centres and intensification corridors have been identified to be acceptable for taller buildings, development will still need to be consistent with other Development Plan policies, including BD1. It might be that for example policies that relate to heritage assets or the amenity of neighbouring properties will reduce the appropriate height below those identified. In addition, the opportunities for increases in height consistent with this policy are more likely to be acceptable where a more comprehensive development takes place including a whole or significant parts of a terrace, or in the case of detached and semi-detached buildings a number of adjacent properties. This</p>		

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			<p>will allow for instance better relationships between proportions of width to height and probably greater development capacity to be achieved. The council will provide further guidance on preferred solutions for different blocks of properties within individual town centres and intensification corridors.</p> <p>6.1.19 Elsewhere, recognising the need in particular to promote new homes and places for work, in other locations, flexibility may be allowed on height compared to existing buildings (potentially up to 6 metres). Outside of Tall Building Zones, town centres and intensification corridors the council as a result of the detailed analysis it has undertaken for the Brent Tall Buildings Strategy, considers opportunities for tall buildings are likely to be more limited.</p> <p>6.1.20 The council does however recognise that historically buildings that would be defined as tall in policy BD2 have been developed in low rise suburban locations and have positively added to the character of a place. This might have been buildings of civic or cultural importance such as places of worship that will have incorporated features taller than the prevailing surrounding buildings, that they warrant landmark status. Another example includes well designed taller mansion blocks.</p> <p>6.1.21 Whilst identifying priority locations for tall buildings, the council does not want to stifle opportunities for good development elsewhere that might be tall but not necessarily inconsistent with good design and other desired policy outcomes. The council recognises that it does not yet know all sites that will be developed over the lifetime of the plan. Extensive areas might come forward</p>		

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			<p>for redevelopment that might not be subject to an allocation. A recent example Northfields shows that large sites can create the opportunity for new character areas that complement the surroundings and are appropriate to accommodate tall buildings. As such the policy seeks to allow for some flexibility where it can be justified, to allow for tall buildings outside areas identified in the Plan, such as in the case of civic or cultural buildings, or sites of a scale which complement that of adjacent areas. As with other areas covered by the policy there should be a stepping down to form a positive relationship with remaining adjacent properties.</p> <p>6.1.22 In all cases the tall buildings element must be of such a design quality that it should enhance the character of the place within which it is set. London Plan policy D89 contains criteria for the assessment of the appropriateness of tall buildings applications, including visual functional, environment and cumulative impacts. This together with design policies D1, <u>D3</u>, <u>D24</u>, and <u>D46</u> (incl. Table 3.2) and <u>D6</u> forms a detailed policy framework against which the design merits of a tall building can be considered. In addition, Brent Local Plan policies, Brent Tall Buildings Strategy and the Brent Design Guide SPD1 identify a range of matters to appropriately address some of which include:</p> <p>a) Visual impacts:</p> <ul style="list-style-type: none"> · Positive contributions to views from different distances · Positively reinforcing the hierarchy of place and assist wayfinding · Elegant, with exemplary architectural quality and materials · Buildings positively contributing to the character of an area, including impacts on heritage assets 		

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			<ul style="list-style-type: none"> · No adverse reflected glare b) Functional Impacts: <ul style="list-style-type: none"> · Internal design to ensure safety of occupants · Servicing, maintenance and management · Accesses and ground floor uses ensuring no · Movement capacity in the area · Sufficient infrastructure provided · Benefits to wider area maximised · No adverse effect on aviation, navigation, telecommunication and solar energy generation c) Environmental Impacts: <ul style="list-style-type: none"> · Wind, daylight, sunlight and temperature conditions · Support air movement · Noise d) Cumulative Impacts: <ul style="list-style-type: none"> · Combined impacts of numerous buildings in one place <p>LONDON PLAN D1 London’s Form, Character and Capacity for Growth Policy D1A2 Infrastructure Requirements for Sustainable Densities Policy D1A3 Optimising Site Capacity Through a Design Led Approach Policy D24 Delivering Good Design Policy D89 Tall Buildings</p> <p>BRENT Brent Tall Building Strategy Brent Design Guide SPD1</p>		

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MM95	6.1 Design	BD3, page 280	<p><i>Add new part g) to the policy to read:</i></p> <p>Proposals for basement development of an existing property must:</p> <ul style="list-style-type: none"> h) Ensure any lightwells are modest in scale, preferably located to the rear and if located to the front are no more than whichever is the smaller of 800mm or half the length of the garden. i) <u>Be protected from sewer flooding by a suitable pumped device</u> 	Clarity on measures required to reduce potential risk of basement flooding.	Yes. Requirement for a pump with regards to sewer flooding.

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MM96	6.2 Housing	6.2.6, page 283	<p><i>Amend para 6.2.6 to read:</i></p> <p>The Brent Strategic Housing Market Assessment 2018 (SHMA) identified a need for <u>approximately 48,000 additional homes between 2016-2041</u>. This is equivalent to 1,920 dwellings per annum. Using a limit of 33% of gross household incomes to be spent on rent/ mortgages, affordable housing comprises <u>884 dwellings per annum (19,448 homes over the Plan period) or 46% of that need</u>. <u>This increases to over 50% when taking account of wider London's affordable needs when applying these to the additional homes Brent is required to provide as set out in the London Plan</u>. This does not include people who currently live in private rented</p>	To clarify the number of affordable dwellings need identified in the Strategic Housing Market Assessment and percentage when taking account of wider London needs.	No, amendment for clarity only.

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			<p>housing who are receiving housing benefit to make their rents affordable; technically the market can provide for their needs. A desire to reduce benefit dependency, particularly of those who work arguably would mean real affordable needs are higher. Of the affordable need, 85% was for social rent (council house type rents) and 10% was for London Living Rent (pegged at a % of median incomes). 5% was for people able to afford between that and 80% of median local rents; typically these people might seek to buy shared ownership homes.</p>		
	6.2 Housing	6.2.15, page 284	<p><i>Amend para 6.2.15 to read:</i></p> <p>Typically, around 260 new homes per year have been delivered on small sites (defined as sites less than 25 dwellings or 2,500 sqm <u>0.25 hectares</u> in the London Plan). The Mayor considers that there is large potential in increasing numbers, identifying outer London boroughs as the principal locations. The London Plan identifies a target of 1,023 <u>433</u> dwellings for Brent through this source. Historic levels of delivery with policies that were generally supportive of small site delivery show this to be extremely <u>indicate this will be a challenging target</u>. The council's evidence indicates that an average target of 373 dwellings over the first 10 years of the Plan is more realistic with 469 dwellings per annum from 2029/30.</p>	Consistency with London Plan and reflects Council's acceptance of London Plan methodology rather than West London evidence base as the basis for identifying small site windfall allowance.	No, amendment for consistency only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM97	6.2 Housing	Policy BH1 Page 287	<p><i>Amend Policy to:</i></p> <p>The council will maximise the opportunities to provide additional homes in the period to 2041 and beyond. To achieve this it will grant planning permission to support the delivery of the Growth Areas, site allocations and appropriate windfall sites to provide a minimum 27,482 23,250 homes in the period 2019/20-2028/29. It will positively plan to promote a further minimum of 18,074 homes from 2029/30 to the end of the Plan period in 2041 and a minimum of 46,018 homes in the period 2019/20-2040/41. Delivery will be assessed against Appendix 3 Housing Delivery Trajectory Annual Housing Requirement.</p> <p>In doing so it will take into account the likely need to continue to plan for new homes beyond each of these periods, ensuring that master planning and planning permissions take account of and positively plan for the potential for adjacent and sites in the wider area to come forward in the future to create successful places and mixed use communities.</p>	To reflect policy covers the Plan period and not beyond, the updated housing trajectory and retitle of Appendix 3.	Yes. Housing targets have been amended.
MM98	6.2 Housing	BH2, page 288	<p><i>Amend policy to read:</i></p> <p>In addition to the Growth Areas and Site Allocations identified in this Plan, town centres, edge of town centre sites, areas with higher levels of public transport</p>	Consistency with London Plan and provide clarity on status of existing permissions within the policy.	Yes. Inclusion of high PTAL areas as appropriate for development.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>accessibility levels and intensification corridors will be priority locations where the provision of additional homes will be supported.</p> <p>Within town centres, edge of town centre sites and intensification corridors where existing non-residential floorspace forms part of a site proposed for residential development, the Council will require re-provision of the same amount and use class of non-residential floorspace. Exceptions to this will be where it can be shown that:</p> <ul style="list-style-type: none"> d) the site is allocated or has planning permission for an alternative use(s); e) there is no need for it or reasonable prospect of its use if provided; or f) in exceptional cases that its loss is outweighed by the benefits that its replacement with residential floorspace will bring. 		
MM99	6.2 Housing	BH3, page 290	<p><i>Add new sentence to the beginning of the policy to read:</i></p> <p><u>The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent.</u> To encourage increased housing delivery, within each Growth Areas (excluding South Kilburn) or development sites of 500 dwellings or more, the provision of Build to Rent properties will be expected unless this would:</p>	Clarity and consistency with the London Plan.	Yes.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM100	6.2 Housing	BH4, page 291	<p><i>Amend policy to add new text to read:</i></p> <p>Planning Permission for Small Sites will be determined in accordance with London Plan Policy H2 with the exception of:</p> <p>Criterion D 2, which in Brent will only apply within PTAL 3-6 locations</p> <p><u>Small housing developments (below 0.25 hectares or 25 dwellings in size) delivering a net addition of self-contained dwellings through the more intensive and efficient use of sites, where consistent with other policies in the development plan, will be supported within the priority locations of PTAL 3-6, intensification corridors, or a town centre boundary through:</u></p> <p><u>a) the infill of vacant or underused brownfield sites,</u></p> <p><u>b) residential conversions, redevelopment, extensions of dwellings, or infill within the curtilage of a dwelling</u></p> <p><u>c) the redevelopment of flats, non-residential buildings and residential garages,</u></p> <p><u>d) upward extensions of flats and non-residential buildings</u></p> <p><u>In these priority locations, the character of the existing area will be subject to change over the Local Plan period. Outside the</u></p>	Revise policy and policy justification given that Policy H2A has been removed from the Intend to Publish version of the London Plan.	Yes.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>priority locations greater weight will be placed on the existing character of the area, access to public transport and a variety of social infrastructure easy accessible on foot when determining the intensity of development appropriate.</u></p> <p><u>Developments that demonstrably fail to optimise potential housing delivery on a site or prejudice more comprehensive development, particularly that of a site allocation, will be refused.</u></p> <p><u>All minor residential developments (less than 10 dwellings) are required to deliver an Urban Greening Factor of 0.4 on site.</u></p> <p><i>Amend policy justification to read:</i></p> <p>Justification</p> <p>6.2.3 The London Plan sets ambitious targets for small site development across London on the basis of the content of Policy H2 Small Sites. The council is positive about the extent to which small sites can contribute towards meeting housing needs. It anticipates delivery of about 370 dwellings per year. In relation to Policy H2 the council has in the Local Plan identified town centre boundaries and main movement/ public transport corridors (known as intensification corridors) as principal areas where it considers the most obvious</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>potential exists. <u>The London Plan in Policy H2 Small Sites identifies that for London to deliver more of its housing; a substantial contribution from smaller sites below 0.25 hectares in size will be required. It sets a Brent minimum target of 4,330 for the period 2019/20 - 2028/29 from this source. Consistent with the London Plan, the Council wants to encourage the development of small sites and provide a positive environment for small site developments in areas with good access to public transport and local services.</u></p> <p>6.2.4 As an outer London borough Brent has comparatively high car dependency rates for journeys, particularly north of the North Circular Road. Some tube and railway stations are located in town centres, some however are not and otherwise have a poor level of access to viable public transport alternatives, employment and retail/ other facilities to meet every day needs away from the immediate vicinity of those stations. London Plan policy H2's 800 metre buffer around town centres and underground/ railway stations also takes no account of the quality of the physical links to those centres or the quality of public transport service there. A large site development might be able to address these through contributions to improve links or public transport improvements/ contributions to provision of controlled parking zones. Small</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>developments however usually are not subject to S106 and provide limited Community Infrastructure Levy funds which are therefore unlikely to be able to satisfactorily address such shortcomings. In addition, the percentage of residents that use the train/ underground as their main/ only mode of transport is very limited. <u>The policy identifies the types of the developments considered likely to be appropriate and the priority locations for these types of developments. The areas are likely to be some of the better served by public transport and thus more sustainable, in terms of reducing reliance on the private car with its associated impacts, such as air quality. The Council accepts that priority locations that are not identified as designated heritage assets or areas of distinctive residential character are likely to be subject to substantial change in character over the Plan period. Whilst character will change, the Council will still expect high quality development.</u></p> <p>6.2.41 As such the council considers that London Plan Policy H2 needs some refinement to take account of Brent circumstances. In areas where small scale development is likely to encourage high levels of car dependency it could undermine other objectives, such as reducing travel by car, improving air quality, maintaining quality of life of existing residents and impacting business</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>efficiency related to movement of goods. As such in Brent criterion A2 has been amended to only apply where there are genuine reasonable public transport alternatives that could realistically encourage people to not own/ use a car on a frequent basis.</p> <p><u>6.2.41</u> Developments are likely to be within close proximity to existing homes. They should therefore be carefully and creatively designed, to avoid for example an unacceptable level of harm to neighbours' and occupants' amenity. Building design and the placement of windows and the use of landscaping can positively address privacy matters and ensure homes benefit from satisfactory levels of daylight and sunlight. In addition to design guidance for small housing sites that the Mayor will produce, the Council is also likely to adopt its own guidance to reflect Brent's characteristics.</p> <p><u>6.2.41a</u> Although it is likely that opportunities will exist outside the priority locations for small sites development, the intensity of development allowed is likely to be less. This is likely to be as a result of the existing character of those areas, which as they are not priority areas for development is not expected to significantly change. In addition the extent to which public transport and access to social facilities is within</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>walking distance will also be considered. The poorer the access, the less intense the acceptable development is likely to be. In order to maximise the potential of all sites within the borough, small housing developments will not be acceptable where they fail to optimise potential housing delivery or prejudice the more comprehensive development of a wider site allocation.</u></p> <p><u>6.2.41bThe open, green quality of the suburban environment was part of Brent’s historical appeal. Over time, intensification of building coverage and hard landscaping, principally to accommodate cars, has reduced incidental green infrastructure. This has not only affected the visual quality of the environment, but has also bio-diversity, urban temperatures, air quality, and the volume and speed of surface water run-off, together with water quality. Small site development without some form of safeguards could well intensify these matters. Application of the urban greening factor to minor developments will assist in better addressing these matters, making up for the loss of green infrastructure where this might be lost, or supporting its re-introduction where sites may now have none. As such, delivery of green infrastructure on site consistent with an Urban Greening Factor of 0.4 will be sought on site with</u></p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>London Plan Policy G5 Urban Greening applying to minor developments (under 10 dwellings).</u></p> <p>LONDON PLAN</p> <p>Policy H2 Small sites</p> <p>Policy H2A Small Housing Developments</p> <p><u>Policy G5 Urban Greening</u></p> <p><u>Policy D7 Accessible Housing</u></p>		
MM101	6.2 Housing	BH5, page 292	<p><i>Amend policy to read:</i></p> <p>In Brent the strategic affordable housing target that will apply is 50% of new homes in the period to 2041.</p> <p><u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing tenure split required to comply with London Plan Policy H56 Threshold Approach to Applications is for:</p> <p>Non-Build to Rent developments of 10 dwellings or more is:</p> <ul style="list-style-type: none"> g) 70 per cent Social Rent/ London Affordable Rent and; h) 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent, affordable rent within Local Housing Allowance limits and London Shared ownership. These must be for households within the most up to date income 	Clarity of alignment with London Plan, and grammar.	Yes. With regards to 'equivalent rents or lower' insertion.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>caps identified in the London Housing Strategy or London Plan Annual Monitoring Report. Build to Rent developments, a minimum of 100 per cent at London Living Rent equivalent rents or lower. Developments of between 5-9 dwellings will be required to make a financial contribution for the provision of affordable housing off-site.</p>		
MM102	6.2 Housing	6.2.49a, page 294	<p><i>Insert new para labelled 6.2.49a after 6.2.49 to read:</i></p> <p><u>6.2.49a In accordance with national policy and London Plan Policy H4, on major residential developments affordable housing should be provided on site, as part of the emphasis on creating mixed and balanced communities. Nevertheless, it might be that in exceptional circumstances financial contributions in lieu of provision of affordable housing on site will be acceptable. This is most likely to be the case for sites subject to late stage viability assessment reviews that due to the threshold approach will be subject to viability testing prior to and post planning permission. More detail on the when contributions in lieu of on-site provision will be acceptable and how they are calculated is set out in the Mayor's Housing SPG. On sites of between 5-9 dwellings it is recognised that on site provision is likely to be more challenging related to a number of issues, but particularly their attractiveness to registered providers to take on responsibility for ownership and management. As such, on these sites a financial contribution in lieu of on-site provision will be</u></p>	Clarity on situations where financial contributions in lieu of on-site affordable housing occurs.	No, amendment for clarity only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<u>sought to support affordable housing provision elsewhere in the borough as set out in Policy BH5.</u>		
MM103	6.2 Housing	BH7, page 296	<p><i>Amend part f) and part g) of the policy to read:</i></p> <ul style="list-style-type: none"> l) includes management arrangements agreed with the council suitable to its proposed use and size to not unacceptably impact on neighbour amenity; m) demonstrates that there is a specific Brent need, or in the case of education purpose built student accommodation a London need, for the particular use; and n) will not lead to an over-concentration of the type of accommodation in the area. For Houses in Multiple Occupation this an over-concentration is defined as where no more than 4 of 11 adjacent three or more of the ten nearest properties are Houses in Multiple Occupation. 	Clarity.	Yes. With regards to changed definition of an over-concentration of HMO's.
MM104	6.2 Housing	BH8, page 299	<p><i>Amend policy to read:</i></p> <p>To support achieving the London Plan annual benchmark monitoring provision target figure of 230 dwellings per annum the council will require minimum provision of specialist older people's accommodation in the following circumstances:</p>	Consistency with London Plan terminology and reflects criterion a) of the same supported by viability assessment.	Yes. With regards to the insertion 'as a minimum 10% on'.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<ul style="list-style-type: none"> b) Within all Growth Areas except South Kilburn developers will be expected to work together to identify sites on which as a minimum 10% of all the Growth Area's additional dwellings over those which already have planning permission will be delivered as specialist older people's accommodation; o) Elsewhere, as a minimum 10% on sites with a capacity of 500 or more dwellings. 		
MM105	6.2 Housing	BH9, page 300	<p><i>Amend policy to read:</i></p> <p>The existing Lynton Close travellers' site will be retained and reconfigured to maximise the number of pitches available, as well as being brought up to a standard that allows for it to meet its existing residents' needs unless evidence shows it is no longer needed.</p> <p>The Council will seek to accommodate the identified needs for any additional pitches in its the latest available gypsy and travellers needs study that is consistent with the most up to date national or adopted London Plan definition of Gypsy and Travellers and associated needs assessment methodology.</p> <p>Within Growth Areas (except South Kilburn) and developments of 1 hectare or more that will include new homes, the potential for the incorporation of a dedicated Gypsy and Travellers' site/s should be robustly</p>	Consistency with London Plan, National Planning Practice Guidance, incorporates Secretary of State directions, takes account of needs and a site audit which has identified needs for improvements to Lynton Close and potential on site solutions for additional pitches to accommodate residents, plus the on-going engagement with existing Lynton Close occupiers on the	Yes. With regards to the improvement/better utilisation of existing sites.

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			<p>considered as part of any required masterplanning/site design evolution process. If it is evidenced that a more traditional format of site cannot be incorporated, then more innovative ways of accommodating needs should also be shown to have been considered.</p> <p>Any new Proposals for Gypsy and Travellers' sites should:</p> <ul style="list-style-type: none"> i) Meet a Brent derived need for such accommodation; p) Be located on a site and in an area both environmentally acceptable for residential occupation forming part of a balanced and mixed community, and suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity; q) Have acceptable accessibility by road users and pedestrians and to local services and public transport; and r) Be laid out and incorporate boundary treatments that seek to positively integrate with the adjacent townscape/ communities. <p><i>Amend policy justification to read:</i></p> <p>Justification</p>	<p>choices available to them.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>6.2.79 Brent currently has 30 <u>31</u> formal pitches of accommodation located on the Lynton Road <u>Close</u> site of approximately 1 hectare which historically has had problems of over-crowding. A West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment was undertaken in 2018 <u>consistent with national policy and guidance related to identifying needs.</u> <u>Using the draft London Plan definition of a Gypsy or Traveller, a minimum of an additional 90 pitches would be required.</u> <u>This is very different to the results in the same assessment generated for the national definition.</u> <u>This indicated a need for no additional pitches.</u> Existing residents of Lynton Road <u>Close</u> although living in caravans did not fall within the current national definition of Ggypsies and Ttravellers for planning purposes. <u>Clarity will be provided on adoption of the London Plan which is the most appropriate.</u> <u>The Council brought Lynton Close back under its management in 2017 and subsequently undertook an audit of the site.</u> <u>This clarified that the site is over-occupied and that the on-site facilities are inadequate for the number of occupants and in any case need updating to bring the site up to a satisfactory standard.</u> <u>The Council has resolved to address both these issues.</u> <u>It is working with the site's occupants to find a solution for those legitimately on site.</u> <u>Ultimately it will be for the community working</u></p>		

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			<p><u>closely with the Council to decide what is appropriate for them. If the outcome of this process is that a new site is necessary to accommodate needs, then any proposed site should be consistent with the criteria set out in the policy.</u></p> <p>6.2.80 Assuming traditional accommodation density levels the 90 additional pitches would indicate the need for nearly three hectares of land. For management purposes, this could be three of more sites, depending on their size. Realistically the only land that could accommodate this size of need will be that currently in non-residential use which through redevelopment could provide an acceptable residential environment.</p> <p>6.2.81 Due to the need to accommodate an increased population with associated social infrastructure, many Local Plan policies require replacement of existing residential and non-residential uses. This and the value of land realistically plays a significant role in limiting opportunities for delivery of single use travellers' sites. The 2018 assessment identifies that those in need are unlikely to be in a position to purchase/ develop a site. As such the best opportunities for delivering additional provision are likely to be in areas that will be subject to wholesale regeneration for a range of uses where residential is also appropriate. This includes Growth Areas, or larger development site</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>allocations/ windfall sites that come forward for development incorporating new homes.</p> <p>6.2.82 In order to give a greater likelihood to delivery of Gypsy/ Traveller pitches sites, the council will require robust consideration of their incorporation as part of any large development where a development proposes new homes. This includes in the masterplanning of Growth Areas, or large scale sites of 1 hectare or more. The exception is South Kilburn Growth Area where a masterplanning exercise related to the need to rehouse a significant number of existing tenants in social rent properties has already identified maximum development potential.</p> <p>6.2.83 The scarcity of development land in Brent means that it has to be used efficiently. This is likely to mean that the low density/ intensity models previously used for Gypsy/ Travellers' will be extremely challenging if not impossible to deliver. As with other uses such as schools, health centres or supermarkets, suitable sites may well only come about as part of wider, potentially vertically mixed used developments. Therefore, consideration needs to be given to innovative ways of accommodating Gypsy/ Traveller sites within these types of developments.</p> <p>6.2.84 <u>Any new proposed</u> Gypsy and Traveller sites will need to provide a safe and acceptable potential living environment; essentially consistent with the characteristics expected of</p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>mainstream housing <u>and ideally forming part of a wider balanced and mixed residential community</u>. This includes having good access to social infrastructure to help address recognised disadvantages in relation to educational attainment and health/ life expectancy that this group has. Nevertheless, there should also be consideration of particular needs such as ability of work vehicles and homes to access the main road network and facilities that support employment. The council aims to further Brent's reputation as a place that welcomes diversity. Therefore, the design and layout of Ggypsy and Travellers' sites, particularly at their edges, should look to integrate well with its surroundings and promote opportunities for positive interaction <u>with the adjacent townscape and associated communities</u>.</p>		
MM106	6.2 Housing	BH13, page 306	<p>All new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This is normally expected to be 20sqm per flat and 50sqm per home for family housing (including ground floor flats) (3 bedrooms or more) situated at ground floor level and 20 sqm for all other housing.</p>	Clarity and reflective of denser developments coming in the borough.	Yes. With regards to changed quantum of amenity required for family units above ground floor.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM107	6.4 Economy and Town Centres	BE1, page 315	<p><i>Amend policy and add new paragraph to the policy to read:</i></p> <p>The Granville multi-purpose workspace and community space in South Kilburn Growth Area will be protected and opportunities to provide additional affordable workspace will be sought. In Alperton, Burnt Oak Colindale, Church End, Neasden, Staples Corner and Wembley Growth Areas a minimum of 10% of total employment floorspace within major developments exceeding 3000 sq.m of employment floorspace is to be affordable research and development, light industrial and studio workspace in the B use class which will be protected by condition and / or legal agreement, where appropriate to do so.</p> <p><u>New affordable workspace should normally be provided on-site for the lifetime of the development and managed by an approved provider. Only in exceptional circumstances where it can be demonstrated robustly that this is not appropriate, may it be provided off-site. A financial contribution in lieu of on-site provision will only be accepted where this would have demonstrable benefits in furthering affordable workspace in the borough.</u></p> <p><u>Further and higher Educational provision</u> quarters at Northwick Park and Wembley will be protected and enhanced.</p>	Provides consistency between policy contents and policy justification, reflects changes to Use Classes, clarifies that the requirement for new affordable workspace provision only applies to employment floorspace.	No. Amendments for consistency and clarity only.
MM108	6.4 Economy and Town Centres	BE2, page 317	<p><i>Amend first part of the policy to read:</i></p> <p><u>The Council is committed to exceeding the additional 0.6 hectares equivalent of industrial floorspace need within the plan period.</u> Within SIL</p>	For brevity, clarity of location, consistency	Yes. Inclusion of industrial floorspace

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?																			
			<p>and LSIS, as shown on the Borough Policies Map, development will be supported where it intensifies employment industrial uses, including those for waste, utilities and transport infrastructure and accords with the following principles: as follows <i>Amend table to read:</i></p> <table border="1" data-bbox="703 571 1736 1351"> <thead> <tr> <th data-bbox="703 571 1025 651">Employment Site Industrial</th> <th data-bbox="1032 571 1272 651">Designation</th> <th data-bbox="1279 571 1736 651">Policy approach</th> </tr> </thead> <tbody> <tr> <td data-bbox="703 655 1025 687">East Lane</td> <td data-bbox="1032 655 1272 687">SIL</td> <td data-bbox="1279 655 1736 687">Intensification</td> </tr> <tr> <td data-bbox="703 692 1025 810">Northfields (east and west of Grand Union Canal)</td> <td data-bbox="1032 692 1272 810">SIL</td> <td data-bbox="1279 692 1736 1351" rowspan="6"> These sites will be protected for solely industrial uses as defined in London Plan Policy E4 'Land for industry, logistics and services to support London's economic function' Criterion A. employment uses within use class B1c, B2, B8 and closely related sui generis uses. Development will be supported which increases the amount of employment industrial floorspace in these use classes, including for start-up and space, move on space. Any loss or reduction in floorspace will be resisted. </td> </tr> <tr> <td data-bbox="703 815 1025 847">Wembley</td> <td data-bbox="1032 815 1272 847">SIL</td> </tr> <tr> <td data-bbox="703 852 1025 884">Alperton (central)</td> <td data-bbox="1032 852 1272 884">LSIS</td> </tr> <tr> <td data-bbox="703 888 1025 920">Alperton (south)</td> <td data-bbox="1032 888 1272 920">LSIS</td> </tr> <tr> <td data-bbox="703 925 1025 957">Brentfield Road</td> <td data-bbox="1032 925 1272 957">LSIS</td> </tr> <tr> <td data-bbox="703 962 1025 1351">Kingsbury</td> <td data-bbox="1032 962 1272 1351">LSIS</td> </tr> </tbody> </table>	Employment Site Industrial	Designation	Policy approach	East Lane	SIL	Intensification	Northfields (east and west of Grand Union Canal)	SIL	These sites will be protected for solely industrial uses as defined in London Plan Policy E4 'Land for industry, logistics and services to support London's economic function' Criterion A. employment uses within use class B1c, B2, B8 and closely related sui generis uses. Development will be supported which increases the amount of employment industrial floorspace in these use classes, including for start-up and space, move on space. Any loss or reduction in floorspace will be resisted.	Wembley	SIL	Alperton (central)	LSIS	Alperton (south)	LSIS	Brentfield Road	LSIS	Kingsbury	LSIS	with target of London Plan and local evidence base and industrial emphasis.	target and change from employment to industrial land.
Employment Site Industrial	Designation	Policy approach																						
East Lane	SIL	Intensification																						
Northfields (east and west of Grand Union Canal)	SIL	These sites will be protected for solely industrial uses as defined in London Plan Policy E4 'Land for industry, logistics and services to support London's economic function' Criterion A. employment uses within use class B1c, B2, B8 and closely related sui generis uses. Development will be supported which increases the amount of employment industrial floorspace in these use classes, including for start-up and space, move on space. Any loss or reduction in floorspace will be resisted.																						
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Kingsbury	LSIS																							

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification	Further SA work required?
			Staples Corner	SIL	Intensification and some co-location subject to the comprehensive masterplan approach as set out for LSIS below, including requirements a) to g).		
			Alperton (north)	LSIS	On these sites intensification through co-location will be supported, subject to a comprehensive masterplan approach produced with or agreed by the council demonstrating the following will be achieved: h) Conformity with London Plan policy E7; i) a net increase in employment industrial floorspace resulting in a minimum 0.65 plot ratio or the existing floorspace total, whichever is greater, across the masterplan area; j) a mix of B1(b) research and development , B1(c) light industrial , B2		
			Church End	LSIS			
			Colindale	LSIS			
			Cricklewood	LSIS			
			Honeypot Lane (Lowther Road)	LSIS			
			Honeypot Lane (Westmorelane Road)	LSIS			
			Neasden Lane	LSIS			

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed		Reason for Modification	Further SA work required?	
					<p><u>general industrial and B&B storage and distribution employment</u> floorspace will be delivered reflective of borough needs, including start-up space, <u>and</u> move on space;</p> <ul style="list-style-type: none"> k) proactive engagement with existing businesses to seek to retain them on site where possible, and support for any businesses that cannot be incorporated to relocate off site; l) 10% of employment floorspace to be affordable workspace; m) the development is of a high quality design and will result in sustainable development, well served by community facilities and open space; and n) any potential conflicts between uses can be mitigated and a high 		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification	Further SA work required?
					standard of amenity achieved.		
			Northfields (east of Grand Union Canal)	SIL	Co-location within site boundary of extant planning permission subject to as a minimum providing the amount, typology, and affordability of employment floorspace consistent with planning permission 18/0321. Intensification on the remainder of the SIL.		
MM109	6.4 Economy and Town Centres	BE3, page 319	<p><i>Amend and add new text to policy to read:</i></p> <p><u>Local Employment Sites have an important role to play in ensuring that a range of employment premises are available to meet employment needs, including ensuring the need for additional industrial floorspace capacity is met in the borough. The council will require their retention and where possible their use for research and development, light industrial, general industrial or storage and distribution will be intensified.</u> The Council will <u>only</u> allow the release development of Local Employment Sites to <u>for</u> non-employment uses where:</p> <ul style="list-style-type: none"> c) continued wholly employment use is unviable; or d) development increases the amount of <u>workspace as well as retaining the existing employment use or provides that additional workspace as</u> affordable <u>studio, research and development, light industrial or general industrial</u> workspace in the B use class, with maker space in <u>light industrial</u> use class B1(e) prioritised to meet demand. 			Provide clarity about affordable workspace provision, industrial space and acceptable forms of development .	Yes. Policy clarifies that as a minimum, the maximum viable amount of employment floorspace will be required, whereas potentially before it was not clear within the

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>Where criterion a) is being used to justify the release, the maximum viable replacement of the existing employment floorspace will be sought.</u></p> <p><u>Where criterion b) applies, if within the existing or emerging creative clusters of Harlesden, Wembley Growth Area, Willesden Green, Alperton Growth Area, Kilburn, Kensal Green, Neasden, Queen’s Park, Burnt Oak Colindale Growth Area, and Church End Growth Area, affordable workspace is to be provided on-site. Elsewhere, if affordable workspace is considered unlikely to successful, financial contributions will be secured to provide equivalent affordable workspace elsewhere.</u></p> <p>Work-Live units will be acceptable where they are managed by an organisation committed to their use primarily for employment, as evidenced by a management plan. Loss of Work-Live units to residential will be resisted.</p>		<p>policy that unviable sites would need to re-provide employment floorspace.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
	6.4 Economy and Town Centres	6.4.21 page 319 6.4.26	<p>Local Employment Sites are sites outside of SIL and LSIS in employment use within the B use class and closely related sui generis uses. <u>They can be sites wholly in employment use, or part of the floorspace or yardspace of a mixed use building or site.</u> They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy allows for the release of unviable employment floorspace or, where appropriate, mixed-use development. This is consistent with the NPPF which requires the efficient use of land.</p> <p>Work-Live is the combination of living accommodation (Use Class C3) with workspace (Not Use Class B1, but not B2 or B8) within a single self-contained unit.</p>	<p>For clarification and consistency with policy wording</p> <p>To reflect the changes to the Use Classes Order</p>	No. Amendment for clarity and consistency only.
MM110	6.4 Economy and Town Centres	BE4, page 320	<p><i>Amend policy title to read:</i></p> <p>POLICY BE4: SUPPORTING STRONG CENTRES DIVERSITY OF USES</p> <p><i>Add title 'Diversity of uses' and amend part of that policy to read:</i></p> <p><u>DIVERSITY OF USES</u></p>	Reflect changes to the Use Classes Order, identify designation of secondary frontage,	No. Amendments for clarity and consistency only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>No further A4 drinking establishments or A5 takeaway uses will be permitted within the defined Primary Shopping Frontage of Brent's town centres, as shown on the Policies Map.</p> <p>Non-A1 or A2 uses will be permitted within town centres where:</p> <ul style="list-style-type: none"> a) they would not reduce the proportion of frontage in A1 and A2 use to less than 65% of the primary frontage; or b) if vacancy rates exceed 10% of primary frontage it would not reduce the proportion of frontage in A1 and A2 use to less than 50%; and c) the proposal provides, or maintains, an active frontage. <p>Unviable secondary frontage, as shown on the policies map, on the periphery of town centres will be promoted for workspace, social infrastructure and residential uses. Viability will be determined in accordance with the marketing requirements set out in paragraph 6.4.33.</p>	include reference to supporting text within policy.	
MM111	6.4 Economy and Town Centres	FIGURE 34 Town Centre hierarchy, page 321	<i>Replace amended figure:</i>	For accuracy of town centre hierarchy in line with London Plan	No. Amendment for clarity only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM112	6.4 Economy and Town Centres	BE5, page 323	<i>Amend part of the policy 'Takeaways' to read:</i>	Reflect changes to the Use Class	No. Amendments for

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Subject to other policies within the development plan, takeaways will be approved except where they would result in:</p> <ul style="list-style-type: none"> d) The introduction of any new A5takeaway use within the designated primary frontage of a town centre; e) an A5 use takeaway within 400 metres walking distance of a primary school, secondary school or further education establishment entrance/ exit point; f) more than 6% of the units within a town centre frontage in A5 uses being takeaways; g) more than 1 unit or 15% of the units within a neighbourhood parade, whichever is the greater, in A5 use being takeaways; h) less than three two non-A5 takeaway units between takeaways; or i) on-street parking in front of the premises creating highway safety problems. 	Order, return to previous Plan position as more suitable borough-wide approach in response to discussions with town centre managers.	consistency only.
MM113	6.4 Economy and Town Centres	BE6, page 324	<p><i>Amend first part of the policy to read:</i></p> <p>Loss of A1, A2, A3 retail, commercial, business and service uses or launderettes in neighbourhood parades or isolated shop units outside designated town centres will be permitted where the proposal does not result in a harmful break in the continuity of retail frontages, and the parade or unit is within 400 metres of equivalent alternative provision and;</p> <ul style="list-style-type: none"> a) is unviable; or b) the proposal will provide a community facility for which there is a demonstrable need. 	Reflect changes to the Use Class Order.	No. Amendments for consistency only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM114	6.4 Economy & Town Centres	After 6.4.60, page 328	<p><u>Add new para 6.4.60a after 6.4.60 to read:</u></p> <p><u>6.4.60a When assessing criterion a) significant compromise will relate to the number of dwellings proposed by the applicant, against the likely reduction on the indicative capacity of the site allocation. An assessment of significance will be done on a case-by-case basis. In particular, it will take into consideration performance against the 5-year land supply requirement. It will also assess the extent to which visitor accommodation has already been permitted against the London Plan requirement of 2,622 bedrooms by 2040. The Council might consider that if performance against the housing requirement is healthy, that a greater component of the allocation coming forward as hotel, is appropriate, even if this reduces housing delivery below the indicative allocation target."</u></p>	To provide greater clarity to the policy wording used.	No, amendment for clarity only.

modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM115	6.5 Heritage and Culture	BHC1, page 333	<p><i>Amend policy and add new part e) to read:</i></p> <p>Proposals for or affecting heritage assets should:</p> <ul style="list-style-type: none"> b) demonstrate a clear understanding of the archaeological, architectural or historic significance and its wider context; c) provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the 	To provide a more consistent approach with national policy and reworded for clarity.	No. Amendments for consistency and clarity only.

modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>development on the heritage asset and its context as well as any public benefit;</p> <p>e) retain buildings, structures, architectural features, hard landscaping and spaces and archaeological remains, where their loss would cause harm</p> <p><u>c</u> d) sustain and or enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the street scene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating;</p> <p><u>d</u> e) contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation;</p> <p><u>e</u>) <u>seek to avoid harm in the first instance. Substantial harm or loss should be exceptional, especially where the asset is of high significance. Any proposed harm to or loss of a heritage asset (including to its setting) should require clear and convincing justification and can be outweighed by material planning considerations in the form of public benefits but only if these are sufficiently powerful.</u></p> <p>f) where demolition is proposed within a conservation area detailed plans for any replacement building will be required to allow consideration of whether the replacement would contribute positively to the character or will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures appearance of the area. In cases where demolition is</p>		

modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			permitted conditions and/or legal agreements will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures.		
MM116	6.5 Heritage and Culture	6.5.24 page 336	<p><u>In the first instance</u>, The council will resist significant harm to or loss of <u>to designated</u> heritage assets. It will assess proposals which would directly or indirectly impact on heritage assets in the light of their significance and the degree of harm or loss which would be caused. Where the harm <u>is considered to be</u> would be less than substantial, it will be weighed against any public benefits of the proposal, including securing optimum viable use of the heritage asset and whether it would enhance or better reveal the <u>its</u> significance of the conservation area. For demolition or alteration to be approved, there will need to be clarity about what will be put in its place within a suitable time frame. It should be noted designation as a Locally Listed Building does not provide further statutory protection but it draws attention to the special qualities of the building.</p>	Additional wording to supporting text for clarity	No, amendments for clarity only.
MM117	6.5 Heritage and Culture	BHC4, page 339	<p><i>Amend policy to read:</i></p> <p>The London Plan identifies the Night Time Economy of Wembley of National/International Importance and Kilburn High Road, Cricklewood and Wembley Park as of more than local importance.</p> <p>The council through its own actions and working with others will support Brent's night time economy and in particular the four centres which will be the priority locations for such uses.</p> <p>Development that preserves or enhances existing night time economy activities or creates new ones that will reinforce the role and significance of each centre in the London hierarchy in an inclusive and accessible way will be supported, whilst that which</p>	Reworded for clarity.	No. Amendments for clarity only.

modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			would undermine it will be refused. <u>Development impacting the night-time economy must preserve or enhance its function in line with the London Plan town centre hierarchy. This must accord with the principles of inclusivity and accessibility as laid out within the Mayor's Culture and Night-Time Economy SPG.</u>		
MM118	6.5 Heritage and Culture	BHC5, page 340	<p><i>Amend first paragraph of policy to read:</i></p> <p>The Council will support <u>recognises the important role that pubs can have in contributing to the borough's character and their role as community assets. New public houses will be supported in town centres.</u> The loss of public houses only where <u>will only be supported where the following can be adequately demonstrated.</u></p> <p><i>Amend part a) to read:</i></p> <p>g) its continued use as a pub or as an alternative community facility within the D1 use class is not economically viable as demonstrated by meeting the marketing requirements as set out in paragraph 6.5.39;</p>	To have a more positive wording around the role of public houses and reworded for clarity and consistency with new Use Class.	Yes. More positive towards existing and new public houses.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM119	6.6 Green Infrastructure	BGI1, page 345	<i>Amend first part of policy to read:</i>	For clarity and to avoid repetition, the need for provision of	Yes. For areas outside growth areas

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
	and Natural Environment		<p>The council will expect the provision of additional public open space as set out in Growth Area policies.</p> <p>Major residential developments outside Growth Areas will be expected to provide 0.81 sqm of public open space per resident in the following manner: provision will be on-site will address current and future needs:</p> <ul style="list-style-type: none"> c) in <u>the wards with a public open space deficiency of</u> Alperton, Brondesbury Park, Dudden Hill, Harlesden, Kensal Green, Kilburn, Mapesbury, Queens Park, Queensbury, Tokyngton, Wembley and Willesden Green provision will be by maximising the on-site provision of a range of publicly accessible open spaces for a range of users; d) In the rest of the borough, provision will be on-site unless the size and typology of space that the development generates a need for, with the exception of a Local Area of Play, is already within 400 metres by a direct and safe walking route. <p>Where public open space is not being provided on site, a financial contribution will be sought to improving the quality and/or accessibility of existing open space provision. The provision of 'meanwhile uses', such as pocket parks and community gardens on parts of sites that are likely to be otherwise vacant for long periods will be sought in association with development proposals.</p>	<p>public open space has been set out in all Growth Area policies.</p> <p>As such, based on the evidence-base (Open Space, Sports and Recreation Study) – there is adequate over-provision of open space compared to the national FIT standard, therefore the standard has been removed to only reflect the need in wards with deficiency based on accessibility/proximity that are not in the Growth Area boundaries.</p>	<p>amendment may result in less provision than reliance on a specific policy standard would create. In addition, New open space requirements are considered in Growth Area policies.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM120	6.6 Green Infrastructure and Natural Environment	BGI2, page 350	<p><i>Amend part b) of policy to read:</i></p> <p>b) In the case of major development to make provision for the planting and retention of trees on site. Where retention is agreed to not be possible, developers shall provide new trees to achieve equivalent canopy cover or a financial contribution for off-site tree planting of equivalent canopy cover will be sought.</p> <p><u>Replacement canopy cover will be measured as total canopy area of new trees at time of planting being equal to canopy area of existing mature trees proposed for removal.</u></p>	Clarity and better explanation of requirement by the Council	No. Amendments for clarity only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM121	6.7 Sustainable Infrastructure	BSUI3, page 361	<p><i>Amend first paragraph of policy to read:</i></p> <p>Proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. <u>Proposed development must pass the sequential and exceptions test as required by national policy.</u> The design and layout of proposals requiring a Flood Risk Assessment <u>as set out in paragraph 6.7.37</u> must contribute to flood risk management and reduction and:</p>	Reference the need for sequential test on flooding as sought by Environment Agency and provide clarity by reference to paragraph that sets out when a FRA will be required. To also provide a positive	Yes. Stronger emphasis on improvements to flood storage capacity.

			<p><i>Amend last paragraph of policy to read:</i></p> <p>Opportunities will be sought from the redevelopment of sites in functional floodplain (flood zone 3b) to restore the natural function and storage capacity of the floodplain. Proposals that result in an increase involve the loss of functional floodplain or otherwise would constrain its in natural function, by impeding flow or reducing flood storage capacity and the environmental quality of the watercourse, will be encouraged resisted.</p>	<p>policy approach to encouraging development related to positive impacts on flood storage and environmental quality.</p>	
MM122	Sustainable Infrastructure	6.7.35, page 362	<p><i>Add new para 6.7.35a) after para 6.7.35 to read:</i></p> <p><u>6.7.35 a) The Plan's site allocations and intensification corridors have been considered to be acceptable in principle taking account of the recommendations of the Brent Strategic Flood Risk Assessment Level 2 August 2020 (SFRA2) and the Brent Flood Risk Sequential and Exceptions Test September 2020. Applications for their development must be consistent with the recommendations of the SFRA2 and supported with an appropriate FRA that shows that the development does not unacceptably increase flood risk on or off site.</u></p> <p><i>Add new para 6.7.35b) to read:</i></p> <p><u>6.7.35b) The Council will only consider the redevelopment of sites in functional floodplain to occur within the already identified site allocations and intensification corridors that have been supported by a Level 2 SFRA and Sequential Test.</u></p>	<p>Supporting text for development on floodplain to provide clarity to support policy consistent with the evidence base and national policy.</p>	<p>No, amendment for clarity only.</p>

			<p><u>When applying this policy the guidance in the West London SFRA (2018) specifically Sections 3.11.1 and 3.11.2 must be adhered to, so that it is clear which parts of the site are developable and which areas of the site should remain for flood storage (i.e. functional floodplain). The compatibility of development vulnerability classifications for Flood Zones 3a and 3b set out in the Planning Practice Guidance will apply. The policy is specific about the improvements that will be sought such as restoring natural function and storage capacity of the floodplain. The Council will also seek to improve the environmental quality of any watercourse on these sites. The high level of flood risk warrants very careful consideration of design, mitigation and overall environmental improvement, taking into account climate change, and early discussions with the Environment Agency are recommended.</u></p>		
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Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM123	6.8 Transport	BT1, page 370	<p><i>Amend 'Active Travel' part c) to read:</i></p> <p>d) provide for and make contributions towards connected, high quality, convenient and safe cycle routes and facilities in accordance with the Brent Cycling Strategy, including cycle parking, in line with or exceeding London Plan standards and TfL and WestTrans design standards, the implementation of new cycleways, and a borough wide cycle hire scheme;</p> <p><i>Amend part k) to read:</i></p>	Clarity on standards that will apply, support for bus network; also, title moved down as that point should be part of 'sustainable travel' not 'clean technology'	Yes. With regards to criterion K.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p>Clean Technology</p> <p>m) support the bus network in Brent by identifying and implementing bus priority measures to improve coverage and journey time reliability; maintaining existing coverage and improving connectivity to areas of the borough with limited public transport access, of the bus network and enable and improved bus interchange facilities;</p> <p><i>Insert title before part l) to read:</i></p> <p><u>Clean Technology</u></p> <p>n) increase coverage of Electric Vehicle charging points across the borough.</p>		
MM124	6.8 Transport	Policy BT2, page 373	<p><i>Amend first paragraph of the policy to read:</i></p> <p>Developments should provide parking consistent with parking standards in Appendix 4. Car parking standards are the maximum and car free development will be encouraged where an existing Controlled Parking Zone (CPZ) is in place or can be achieved. should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking.</p> <p>Contributions secured through a planning obligation to existing and new car clubs, bike clubs and pool car and bike</p>	To ensure policy accords with London Plan policy T6- Car Parking	Yes. With regard to removal of requirement for a CPZ.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			schemes in the borough will be strongly encouraged in place of private parking in developments.		
MM125	6.8 Transport	BT3, page 376	<p><i>Amend part of the policy to read:</i></p> <p>PROVISION AND PROTECTION OF FREIGHT FACILITIES</p> <p>Development that would generate significant movement of goods or materials, both during construction and in operation, should minimise the movement of goods and materials by road. <u>Freight consolidation through maximising the use of the capacity of vehicles entering and exiting a site and</u> the use of more sustainable alternatives, i.e. by rail and canal, <u>and pursuit of best practice in technical innovation to consolidate delivery and construction transport</u> is encouraged.</p> <p>For longer distance movements, the provision of sidings within suitable new developments adjoining railway lines is supported. Warehousing development, adjoining rail lines where rail access can be provided, should include sidings.</p> <p>Existing sidings <u>and sites adjacent to them or the canal with the potential for rail freight use</u> will be protected where these are adaptable to serve anticipated needs. <u>Development proposals which would conflict with the effective operation of these facilities will not be permitted unless:</u></p>	Greater clarity on freight consolidation and protection of facilities.	Yes. Policy includes much more detail on what is required.

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			<p><u>a) appropriate mitigation is provided to ensure it will not place unreasonable restrictions on the effective operation of these facilities; or</u></p> <p><u>b) the existing facility can be satisfactorily relocated within the development proposals in terms of operational requirements and environmental criteria; or</u></p> <p><u>c) the facility is replaced in an appropriate alternative location</u></p>		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
MM126	7 Delivery and Monitoring	7.1.20, page 384	<p><i>Add new sentences at the end of para 7.1.20 to read:</i></p> <p><u>Infrastructure delivery will also be monitored through the AMR and the Infrastructure Funding Statement, both of which are intended to be published on an annual basis. In addition, the Council has introduced formal governance arrangements for the spending of strategic CIL and S106. This will enable CIL to be allocated in a transparent, consistent and accountable way that will help deliver key infrastructure priorities identified in the Local Plan, the Infrastructure Delivery Plan and the Council's capital programme.</u></p>	To provide greater clarity to monitoring arrangements for infrastructure delivery	No, amendment for clarity and monitoring purposes only.
MM127	7 Delivery and Monitoring	7.1.22, page 384	<p><i>Add new sentences at the end of para 7.1.22 to read:</i></p> <p>Monitoring is an important part of the continuous planning process. Changing circumstances means that the monitoring of policies is required to deliver,</p>	To provide greater clarity to monitoring targets	No, amendment for clarity and monitoring purposes only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			manage, and if necessary adapt or bring forward alternative planning approaches to Brent's growth and meeting the borough's needs for homes, jobs, services and infrastructure. <u>Monitoring of policies will be undertaken through the AMR and where targets are not being met, a review may be triggered. A review may also be triggered by a review of the London Plan or changes to national policy.</u>		
	7 Delivery and Monitoring	Figure 39, page 385, (new targets – first and second measures):	Performance Measure " <u>Proportion of Brent Local Super Output Areas in the bottom 20% of most deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>15% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> " Performance Measure " <u>Proportion of the top 20% least deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>2% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> "	Improve monitoring of policy outcomes.	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39, page 385	Performance Measure "Tall Buildings allowed inconsistent with policy" Target " None <u>Zero</u> " Specific Policy to be Monitored " BD4 <u>BD2</u> "	To correctly identify the target and policy	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39, page 385	Performance Measure "Residential basements in existing properties allowed that are larger than policy criteria" Target " None <u>Zero</u> " Specific Policy to be Monitored " BD2 <u>BD3</u> "	To correctly identify the target and policy	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39, page 385 (new measure)	Performance measure: " <u>Percentage of Build to Rent affordable housing to be London Living Rent tenure</u> " Target: " <u>100%</u> " Specific policy to be monitored: " <u>BH3</u> "	To improve monitoring of outcomes of policy BH3	No, amendment for clarity and monitoring purposes only.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
	7 Delivery and Monitoring	Figure 39, page 385 (new measure)	Performance Measure " <u>Number of homes built on small sites.</u> " Target " <u>433 dwellings per annum.</u> " Specific policy to be monitored " <u>BH4</u> "	To provide greater clarity to monitoring of outcomes of policy BH4	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Tenure split of affordable housing within major development with an affordable housing planning obligation." Target " <u>70% social/ London affordable rent; below LHA rates 30% intermediate.</u> " Specific policy to be monitored "BH5"	To clarify monitoring of policy BH5	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Additional bed spaces built in communal establishments." Target " <u>No specified target.</u> " Specific policy to be monitored "BH7"	To provide clarification of monitoring target	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Net Number of Additional Gypsy and Traveller Pitches Provided." Target " <u>Consistent with accepted definition outcome of Lynton Close audit.</u> " Specific policy to be monitored "BH9"	To provide clarification of monitoring target	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Net number of dwellings lost where the development results in an overall loss of dwellings." Target " <u>No specified target. Reasons for any net loss of dwellings to be explored and clarified within the AMR.</u> " Specific policy to be monitored "BH10"	Clarification of target. To direct readers to further information / clarification on monitoring of target BH10	No, amendment for clarity and monitoring purposes only.


Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
	7 Delivery and Monitoring	Figure 39 , page385	Performance measure: "Number of permissions where conversion of an existing 3 bed dwelling results in additional dwelling plus family accommodation." Target: "No Target" <u>No net loss of family sized (3+bedroom) accommodation."</u> Specific policy to be monitored "BH11"	To correctly identify target to monitor policy BH11	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39 , page 385	Performance measure: "Amount of managed work space provided." Target: "No Target" <u>10% of employment floorspace within major developments exceeding 3000sqm employment as affordable workspace"</u> Specific policy to be monitored "BE1"	To correctly identify target to monitor policy BE1	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39 , page 385 (target for BE2)	Performance measure: "Net additional employment industrial floorspace provided in SIL and LSIS and LES by intensification or co-location" Target: "No <u>specified</u> target, but definitely no <u>net</u> loss" Specific policy to be monitored: " BE2 and BE3 "	To ensure effective monitoring of policy BE2	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39 , page 385 (new separate line for BE3)	Performance measure: " <u>Net additional industrial floorspace provided in Local Employment Sites</u> " Target: " No specified target. Reasons for any net loss of floorspace to be explored and clarified in the AMR " Specific policy to be monitored: " BE3 "	To ensure effective monitoring of policy BE3	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39 , page 385	Performance measure: "Additional A4 or A5 <u>drinking establishments and hot food takeaway</u> units granted permission in Primary Shopping Frontages." Target: " None <u>Zero</u> " Specific policy to be monitored: "BE4"	To reflect change to Use Classes Order and more specific target (Policy BE4)	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39 (removal of	Performance measure: Proportion of primary frontage in A1 and A2 use.	Removal of target to reflect change to Use	No, amendment for clarity and

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
		target), page 385	Target: Proportion of frontage in A1 and A2 use not to fall below 65%, or 50% if vacancy rates exceed 10%. Specific policy to be monitored: BE4	Classes Order, and policy BE4	monitoring purposes only.
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Concentration of takeaways and proximity of takeaways to <u>primary schools</u> , secondary schools and further education establishments." Target: "Proportion of units in use as takeaways in town centres not to exceed 6%, and no further takeaways within 400 metres or of a <u>primary school</u> , secondary school or further education establishment." Specific policy to be monitored: "BE5"	To accurately reflect policy BE5	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39 page 386	Performance measure: "Number of public houses lost and not replaced by development." Target: "No <u>net</u> loss of viable public houses/ <u>drinking establishments</u> " Specific Policy to be measured: "BHC5"	To effectively monitor policy BHC5	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39 page 386	Performance measure: "Loss of Category A Tree Preservation Order Trees." Target: " None <u>Zero</u> " Specific Policy to be measured: " BGI4 <u>BGI2</u> "	To correctly identify target and policy being monitored (BGI2)	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39 page 386	Performance measure: "Change in Community Infrastructure Floorspace (Schools, Healthcare, Other Community Space, Cultural and Leisure Facilities)." Target: " None <u>Zero</u> " Specific Policy to be measured: "BSI1"	To correctly identify target (BSI2)	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39	Performance measure: " <u>Number of new district heat networks in growth areas</u> " Target: " <u>No specified target</u> "	To effectively monitor policy BSUI1	No, amendment for clarity and

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			Specific policy to be monitored: " <u>BSUI1</u> "		monitoring purposes only.
	7 Delivery and Monitoring	Figure 39	Performance measure: " <u>Percentage of major developments delivered within Growth Areas and Air Quality Focus Areas that are air quality positive</u> " Target: " <u>100%</u> " Specific policy to be monitored: " <u>BSUI2</u> "	To effectively monitor policy BSUI2	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39	Performance measure: " <u>Percentage of major developments delivered outside of Growth Areas and Air Quality Focus Areas that are air quality neutral</u> " Target: " <u>100%</u> " Specific policy to be monitored: " <u>BSUI2</u> "	To effectively monitor policy BSUI2	No, amendment for clarity and monitoring purposes only.
	7 Delivery and Monitoring	Figure 39	Performance measure: " <u>Number of developments permitted where the Environment Agency has outstanding advice that there has been failure to make appropriate provision for flood risk mitigation, or which would increase risk or consequence of flooding</u> " Target: " <u>Zero</u> " Specific policy to be monitored: " <u>BSUI3</u> "	To effectively monitor policy BSUI3	No, amendment for clarity and monitoring purposes only.

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MM128	Appendix 1	Page 388	<u>Delete Appendix 1 from the Plan</u>	Table in Appendix 1 no longer necessary	No, removed as no longer necessary.
MM129	Appendix 3	Page 392	<u>Amend Appendix 3 and the table to read:</u>	To provide greater clarity	No, amendment

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			<p><u>BRENT LOCAL PLAN ANNUAL HOUSING REQUIREMENT-HOUSING DELIVERY TRAJECTORY</u></p> <p>Consistent with Policy BH1 'Increasing Housing Supply in Brent' this trajectory is the delivery target against which the National Planning Policy Framework's Housing Delivery Test and 5 year Supply of Deliverable Housing Sites will be assessed.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>19/20-23/24</th> <th>24/25-28/29</th> <th>29/30-33/34</th> <th>34/35-40/41</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Dwellings</td> <td>15,080</td> <td>12,402</td> <td>11,514</td> <td>6,560</td> <td>45,554</td> </tr> <tr> <td>Average Per Year Over Period</td> <td>3,016</td> <td>2,480</td> <td>2,302</td> <td>937</td> <td>2,070</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Year</th> <th>19/20-28/29</th> <th>29/30-40/41</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Dwellings</td> <td>27,482</td> <td>18,074</td> <td>45,554</td> </tr> <tr> <td>Average Per Year Over Period</td> <td>2,748</td> <td>1,807</td> <td>4,555</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Period</th> <th>Housing Delivery Target Per Annum</th> </tr> </thead> <tbody> <tr> <td>First 5 years (2019/20 - 2023/24)</td> <td>2,325</td> </tr> </tbody> </table>	Year	19/20-23/24	24/25-28/29	29/30-33/34	34/35-40/41	Total	Dwellings	15,080	12,402	11,514	6,560	45,554	Average Per Year Over Period	3,016	2,480	2,302	937	2,070	Year	19/20-28/29	29/30-40/41	Total	Dwellings	27,482	18,074	45,554	Average Per Year Over Period	2,748	1,807	4,555	Period	Housing Delivery Target Per Annum	First 5 years (2019/20 - 2023/24)	2,325	on what the trajectory will be used for and updated to reflect estimated delivery based on knowledge of sites.	for clarity only.
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MM130	Appendix 6	Strategic Policies in the new Brent Local Plan for the purposes of Neighbourhood Planning, page 396	<p><i>Amend table in Appendix 6 to read:</i></p> <p><u>Strategic Policies</u> <u>DMP1, BP1, BCGA1, BP2, BEGA1, BEGA2, BP3, BNGA1, BP4, BNWGA1, BP5, BSGA1, BP6, BSEGA1, BP7, BSWGGA1, BD1, BD2, BH1, BH2, BH3, BH4, BH5, BH6, BH7, BH8, BH9, BH10, BH11, BH12, BH13, BS11, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BT1, BT2, BT3, BT4</u></p> <p><u>STRATEGIC POLICIES:</u> <u>All Place Policies: BP1, BP2, BP3, BP4, BP5, BP6, BP7</u></p>	Clarification on which policies are strategic and which ones are non-strategic	No, amendment for clarity only.												

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification	Further SA work required?
			<p><u>All Growth Area Policies: BCGA1, BEGA1A, BEGA2A, BEGA1, BEGA2, BNGA1, BNWGA2A, BNWGA1, BSGA1, BSEGA1, BSWGGA1</u></p> <p><u>All Site Allocation Policies: BCSA1-BCSA20, BESA1-BESA3, BNSA1-BNSA8, BNWSA1, BSSA1-BSSA19, BSESA1-BSESA35, BSWSA1-BSWSA17</u></p> <p><u>Other policies: BD1 Leading the Way in Good Urban Design</u></p> <p><u>BD2 Tall Buildings in Brent</u></p> <p><u>BH1 Increasing Housing Supply in Brent</u></p> <p><u>BH2 Priority Areas for Additional Housing Provision within Brent</u></p> <p><u>BH3 Build to Rent</u></p> <p><u>BH4 Small Sites and Small Housing Developments in Brent</u></p> <p><u>BH5 Affordable Housing</u></p> <p><u>BH6 Housing Size Mix</u></p> <p><u>BH7 Accommodation with Shared Facilities or Additional Support</u></p> <p><u>BH8 Specialist Older Persons Housing</u></p> <p><u>BH9 Gypsy and Traveller Accommodation</u></p> <p><u>BH10 Resisting Housing Loss</u></p> <p><u>BH11 Conversion of Family Sized Dwellings</u></p> <p><u>BS11 Social Infrastructure and Community Facilities</u></p> <p><u>BE1 Economic Growth and Employment Opportunities for all</u></p> <p><u>BE2 Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)</u></p> <p><u>BE3 Local Employment Sites and Work-Live</u></p> <p><u>BE4 Supporting Strong Centres</u></p> <p><u>BE9 Visitor Accommodation and Attractions</u></p> <p><u>BHC1 Brent's Heritage Assets</u></p> <p><u>BHC2 National Stadium Wembley</u></p> <p><u>BHC3 Supporting Brent's Culture and Creative Industries</u></p> <p><u>BHC4 Brent's Night Time Economy</u></p> <p><u>BHC5 Public Houses</u></p>		

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			<p><u>BGI1 Green and Blue Infrastructure in Brent</u> <u>BGI2 Trees and Woodlands</u> <u>BSUI1 Creating a Resilient and Efficient Brent</u> <u>BSUI2 Air Quality</u> <u>BSUI3 Managing Flood Risk</u> <u>BSUI4 On-site Water Management and Surface Water Attenuation</u> <u>BT1 Sustainable Travel Choice</u> <u>BT2 Parking and Car Free Development</u> <u>BT3 Freight and Servicing, Provision and Protection of Freight Facilities</u></p> <p>Non-Strategic Policies <u>BCSA1, BCSA2, BCSA3, BCSA4, BCSA5, BCSA6, BCSA7, BCSA8, BCSA9, BCSA10, BCSA11, BCSA12, BCSA13, BCSA14, BCSA15, BCSA16, BCSA17, BESA1, BESA2, BESA3, BNSA1, BNSA2, BNSA3, BNSA4, BNSA5, BNSA6, BNSA7, BNWSA1, BSSA1, BSSA1, BSSA2, BSSA3, BSSA4, BSSA5, BSSA6, BSSA7, BSSA8, BSSA9, BSSA10, BSSA11, BSSA12, BSSA13, BSSA14, BSSA15, BSSA16, BSSA17, BSSA18, BSSA19, BSESA1, BSESA2, BSESA3, BSESA4, BSESA5, BSESA6, BSESA7, BSESA8, BSESA9, BSESA10, BSESA11, BSESA12, BSESA13, BSESA14, BSESA15, BSESA16, BSESA17, BSESA18, BSESA19, BSESA20, BSESA21, BSESA22, BSESA23, BSESA24, BSESA25, BSESA26, BSESA27, BSESA28, BSESA29, BSESA30, BSESA31, BSESA32, BSESA33, BSESA34, BSWSA1, BSWSA1, BSWSA2, BSWSA3, BSWSA4, BSWSA5, BSWSA6, BSWSA7, BSWSA8, BSWSA9, BSWSA10, BSWSA11, BSWSA12, BSWSA13, BSWSA14, BSWSA15 and BSWSA16</u></p> <p>Non-Strategic Policies: <u>DMP1 Development Management General Policy</u></p>		

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			<u>BD3 Basement development</u> <u>BH12 Residential Outbuildings</u> <u>BH13 Residential Amenity Space</u> <u>BE5 Protecting Retail in Town Centres, Betting Shops, Adult Gaming Centres and Pawnbrokers</u> <u>BE6 Neighbourhood Parades and Isolated Shop Units</u> <u>BE7 Shop Front Design and Forecourt Trading</u> <u>BE8 Markets and Car Boot Sales</u> <u>BT4 Forming an Access on to a Road</u>		
MM131	Glossary	Page 397-99	" <u>Intensification Corridor: Principal movement corridors such as main roads, with good access to public transport where it is considered that higher density development/ buildings around 5 storeys are likely to be appropriate.</u> "	Clarification of term.	No, amendment for clarity only.
MM132	Glossary	Page 398, Locally Significant Industrial Sites (LSIS)	" <u>Employment Industrial sites identified in the Core Strategy Local Plan as being of significance to Brent's economy.</u> "	Consistency with London Plan and update which Plan it is identified.	No, amendment for consistency only.
MM133	Glossary	Page 398	<u>Makerspace: Studio or light industrial workspace for creative industries. These businesses create social and economic value through events and places of interest, attracting visitors, enriching lives and highlighting diverse perspectives through the arts.</u>	To add clarity to the term 'makerspace'.	No, amendment for clarity only.