

This document is an amended version of the draft Brent Local Plan that was submitted for examination in March 2020. It incorporates proposed modifications as set out in the main modifications document Core04_d and additional (minor) modifications Core04_e that were issued for consultation in July 2021

The following format has been used to denote the modifications:

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

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

Modifications are identified with the appropriate reference number, e.g. MM1 (main) or MiM1 (minor) in the documents listed above.

Page to be updated with further additional (minor) modifications prior to Council adoption

London Borough of Brent

Local Plan

Regulation 19 Consultation

October 2019

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Foreword

The London Borough of Brent has a proud history of diversity where communities have lived and worked together for decades. There has been much change over the last twenty years. Significant regeneration in Brent has attracted new residents, jobs, business, investment and visitors. This is all been made possible by the vision and direction Brent council set in its planning policies, namely its Local Plan.

The new Local Plan for Brent is now being drafted to help set the vision for Brent's development. It will set out London Borough of Brent's policies towards housing, town centres, open space, employment, community facilities, the built and natural environment and transport – all of which contribute to making Brent a vibrant place to live and work.

We're working hard to improve living standards, make Brent safer, cleaner and greener, support residents to be healthier and happier, and provide more opportunities to learn and work in the borough. This plan helps make this happen, by giving clear guidance; such as what can be built, where, how, for what use, where restrictions apply and why. We're committed to providing a high quality, responsive Planning Service, and realise how important it is to involve the community in helping us create a better Brent. That's why this powerful plan is the result of on-going community involvement.

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

Following public engagement in 2017 and 2018, this publication stage consultation continues the journey towards the adoption of the Local Plan. We have taken account of the extensive number of comments received. The plan seeks to achieve good growth by addressing the sometimes competing requirements of:

- planning for increased population associated with London's continuing success;
- community needs for additional affordable homes, jobs and inward investment whilst protecting and enhancing valued character and open spaces; and
- pressures on infrastructure such as schools, doctors' surgeries and transport.

It is essential that the residents of Brent are involved in this process of setting the council's planning policy. We encourage you to take this opportunity to participate in the process of shaping the future growth of the borough and the policies within the Plan. It is anticipated that the Plan will be adopted by the end of 2020.

We look forward to meeting you at consultation events and receiving your views.

Councillor Shama Tatler

Cabinet Member for Regeneration, Highways & Planning

Section 1 to be updated with further additional (minor) modifications prior to Council adoption

1 Consultation Overview

1.1 The council is working towards adopting a new Local Plan. The Local Plan is a Development Plan Document. All planning applications must be determined in accordance with the Development Plan unless there are significant reasons for not doing so. The Plan is therefore a very important document in shaping the future development of Brent. It runs to 2041, consistent with the London Plan that will be adopted in 2020. The Local Plan will provide a locally specific spatial policy framework for planning and development for the areas of the borough where the council is the local planning authority as shown in Figure 1.

Figure 1 Brent / OPDC Boundary

1.2 Parts of the borough fall within the local planning authority area of the Old Oak and Park Royal Development Corporation (OPDC). (See Figure 1) OPDC is responsible for writing the Local Plan for its area and determining the majority of planning applications there too. As set out in a scheme of delegation, some planning applications it receives are determined by the council. OPDC's **Local Plan** deals with parts of the borough such as Willesden Junction and Park Royal. It is at a more advanced stage than the council's Local Plan being adopted in late 2019.

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

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

1.4 This version of The Local Plan is a draft document specifically produced for public consultation. It takes account of comments received on the previous stage of consultation: Preferred Options which was consulted upon from November 2018 to January 2019. It is the version that the council wishes to adopt. It recognises however that it is likely that responses to this consultation will result in further proposed changes to the Plan before it is submitted for Examination. This is an opportunity for you to comment on and shape Local Plan policy.

When and how to respond

1.5 The council will be undertaking the Local Plan consultation in accordance with its Statement of Community Involvement adopted in July 2017. The Local Plan review consultation will run for a six-week period starting on **Thursday 24th October 2019**. The deadline for responses is **5pm on Thursday 5th December 2019**.

1.6 At this stage of the Plan comments should be related to the 'test of soundness' as set out in the National Planning Policy Framework. These are whether the Plan is "sound" in respect of being:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework

We would encourage you to provide your comments on the council's consultation website by completing the consultation questionnaire online at:

www.brent.gov.uk/shapebrent This is the quickest way of replying. Alternatively, you can email us or send us your comments by post by using the addresses below. When responding by e-mail or post, please use the Local Plan Consultation Response Form. Please set out clearly the page number, paragraph, policy, figure or image your comment relates to.

Email: planningstrategy@brent.gov.uk

Post: Paul Lewin, Team Leader Planning Policy, Brent Council, Engineers' Way, Wembley, HA9 0FJ

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

1.8 All documents can be read and downloaded from: www.brent.gov.uk/shapebrent Paper copies of this draft Local Plan and supporting documents (excluding the research studies which would result in a significant amount of printing) are available to view during normal opening hours at the following locations:

- Willesden Green, 95 High Road, Willesden NW10 2SF
- Wembley Library, Brent Civic Centre, Engineers Way, Wembley, HA9 0AF;
- Kingsbury Library, 522-524 Kingsbury Road, Kingsbury, NW9 9HE
- Kilburn Library, Salusbury Road, Kilburn NW6 6NN
- Harlesden Library, Craven park Road, Harlesden, NW10 8SE;
- Ealing Road Library, Coronet Parade, Ealing Road, Wembley HA0 4BA

1.9 The libraries also have access to the council's website to allow you to view all supporting documents and make comments.

Drop-in to a public exhibition or workshop

1.10 The council will also hold a number of events/ drop-in sessions within the borough to enable discussion and feedback of proposals in person. To find out about when these are happening please visit: www.brent.gov.uk/shapebrent

What happens next?

1.11 Planning regulations set out the key stages in the preparation of the new Brent Local Plan review as shown in Figure 2. This also shows where we are currently in this process. The policies in the Local Plan must be 'consistent' with the National Planning Policy Framework and in 'general conformity' with the London Plan. Figure 3 shows the relationships between the various levels of policy documents.

1.12 All representations received to this Published Plan consultation will be considered by the council, summarised and published for information. These and any proposed further amendments to the Plan will be submitted to the Secretary of State for examination by an independent planning inspector. The inspector will determine if the submitted Plan meets the required legal and procedural requirements, and when

judged against national planning policy requirements the strategy and policies are 'sound'. Subject to the Plan being found sound, the council will then adopt it.

- 1.13 All representations received on the Plan will be summarised and collated within a consultation statement to support the Local Plan at examination. From publication stage and beyond individual responses will be published online and also be publicly available and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by the council in line with the General Data Protection Regulation 2018.

Figure 2 Local Plan Review Timetable

Introduction be updated with further additional (minor) modifications prior to Council adoption

2 Introduction

Why are we reviewing the Local Plan? The Development Plan

- 2.1 Brent's existing Local Plan comprises a number of documents that have been produced by the council:
- Core Strategy adopted 2010
 - Site Specific Allocations Document adopted 2011
 - Wembley Area Action Plan adopted 2015 and
 - Development Management Policies Plan adopted 2016.
- 2.2 The Plan also includes the **West London Waste Plan** adopted in July 2015 and the **Sudbury Town Neighbourhood Plan** September 2015 and **Harlesden Neighbourhood Plan** May 2019. The Waste Plan being strategic is best prepared jointly with other London boroughs. There is currently no agreed timetable for its update. Neighbourhood plans are not for the council to review; this is the responsibility of neighbourhood forums.
- 2.3 Figure 3 shows the relationship between layers of planning policy. In addition to the Development Plans, policies in the Plans are sometimes given more clarity on how they will be interpreted in Supplementary Planning Documents.

Figure 3 Planning Policy Hierarchy

- 2.4 Since the principal elements of the Plan were adopted (Core Strategy 2010, Site Allocations 2011), national planning policy and practice guidance has radically altered. There has been two fundamental changes in national policy, through the national planning policy framework. The most recent of these was in July 2018, with minor amendments in 2019.
- 2.5 There have also been two significant changes to the London Plan. The 2008 London Plan was superseded in 2011, and consolidated with alterations in 2016. Significantly the borough's housing target increased from 1065 to 1525 dwellings per year. The latest **Draft London Plan December 2017** again proposes substantial additions; a target which is equivalent to 2915 dwellings per year from 2019/20 until 2028/29.
- 2.6 The borough, through the successful delivery of its Growth Areas in particular, has been able to accommodate the London Plan's more recent increases in dwelling numbers. It cannot continue to do so for the longer term, particularly if its target increases, without a radical review of its Local Plan. It is anticipated that the population will grow by 64,900 to 393,700 in the period to 2041. To accommodate this will require not only new homes, but approximately 30,300 new full time equivalent jobs to meet residents' needs, plus the associated improvements to social and physical infrastructure.
- 2.7 Whilst being ambitious about housing growth, the council has submitted representations that challenge the draft London Plan housing target. It does not consider it realistic for a variety of reasons. The council and this emerging Local Plan is planning for an increase above the current 1525 target. The amount of homes delivered will be maximised to that which can reasonably be achieved. This will balance housing delivery against other priorities and calls upon land, e.g. jobs, social infrastructure, open space and local heritage assets and character. The Local Plan

review will consider other development needs and, where necessary, review and update current planning policies.

Implications of having a draft London Plan moving to adoption

- 2.8 Brent's Local Plan should be in 'general conformity' with the London Plan. For the most part Brent supports the contents of the London Plan. Key exceptions are the housing numbers set, particularly related to small sites and the policy approach to industrial land within the borough. The council has objected to these elements of the London Plan. This Local Plan takes forward policies that are realistic and justifiable taking into account local circumstances. Should policies in the draft London Plan remain as is, then it might be necessary for the council to revise this Local Plan's contents in light of the London Plan that moves towards adoption.
- 2.9 This publication version of the Local Plan refers to a number of policies within the draft London Plan. It assumes these for the most part will be adopted in a form that is not very different to the draft London Plan modifications issued in response to the Examination process. Many of these policies provide detailed development management type criteria against which planning applications are assessed.

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

- 2.10 The review is proposing to replace many of the existing Local Plan policies. It seeks to simplify the Plan and make it more understandable. The Issues and Options consultation responses indicated support for replacing the four separate Brent Development Plan Documents set out in paragraph 2.1 with a single document. A schedule of the policies that will be superseded/ replaced and kept with or without amendments is set out in Appendix 1. In effect, it is some of the Development Management Policies that are being carried forward for incorporation into the new Local Plan with no or limited changes. The issues in other existing policies are:
- a) either picked up in the London Plan;
 - b) no longer considered to be of such importance that they warrant inclusion; or
 - c) incorporated into new policies with significant wording changes.
- 2.11 The weight that can be attached to the existing Local Plan compared to policies that emerge as part of the review will be dependent on a number of factors, including: the existing and proposed policy's consistency with national and London Plan policy; the level of support or objection to proposed policies and the stage that it is at within the adoption process. At this stage as policies within the draft Local Plan are in their early development, not yet subject to examination or a council resolution, it is considered that the weight that can be attached to them is likely to be limited in most cases.

Duty to co-operate and statements of common ground

- 2.12 The Localism Act 2011 set out greater provisions to encourage public organisations and local councils to work together to plan properly for areas across borough boundaries. Consistent with this the council will produce evidence to show how it has conformed with the duty to co-operate and produce statements of common ground with neighbouring local planning authorities (Barnet, Ealing, Harrow, Hammersmith & Fulham, Kensington & Chelsea, City of Westminster and OPDC) throughout the various stages of the adoption of the Local Plan.
- 2.13 In considering what policies to contain in the Local Plan the council also has a statutory duty to have regard to Local Transport Authority policies, (which for London is Mayor's Transport Strategy), Articles 5 and 12 of the EU Directive 2012/18/EU on

the prevention of major accidents and hazardous establishments (relevant to site allocations) and the national waste management plan.

Layout of the Brent Local Plan

- 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 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, National Planning Policy Framework and Practice Guidance and London Plan Supplementary Planning Guidance documents. 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.
- 2.15 As a result such the structure of the Brent Local Plan is such that it obviously complements the Good 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.
- 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.
- 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^{MM1} London Plan to set out locally specific Brent policies on these matters.

Figure 4 Proposed Structure of the Brent Local

Supporting Evidence Base Documents

- 2.18 The plan is supported by a series of evidence base documents, some of which might still be in draft form. Others might need to be commissioned to further support policies where required. The Plan identifies 'key evidence' where relevant. We are also inviting comments on these supporting documents.

- 2.19 The Integrated Impact Assessment (IIA) is a document of particular importance. It fulfils the statutory requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (Directive (2001/42/EU) and associated UK Regulations). It also fulfils the requirements for Health Impact Assessment and Equalities' Impact Assessment. All Local Plan policies, including alternative policy options, have been appraised in the IIA.
- 2.20 In planning for Brent's future, the council has also been mindful of the commitment the United Kingdom made to the United Nation's 2030 Agenda for Sustainable Growth and how this can be best delivered. The Integrated Impact Assessment embodies the 2030 Agenda principles within its objectives. All proposed policies in the Plan are have been assessed against these objectives. They seek to fairly balance the key pillars of social, economic and environmental sustainable development.
- 2.21 The scope of the IIA was subject to consultation at the Issues and Options stage. The council worked closely with statutory consultees and other interested parties in setting out the scope and objectives within the IIA against which to assess the contents of the draft Local Plan.
- 2.22 A Habitats Regulation Assessment (HRA) Screening exercise has been carried out in accordance with European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive'). This is to determine whether the content of the Local Plan will generate an adverse impact on the integrity of a 'Natura 2000' site. For Brent, these sites are Richmond Park and Wimbledon Common.

3 Brent's Characteristics

- 3.1 The London Borough of Brent covers an area of 4,325 hectares - almost 17 square miles, between inner and outer north west London. It extends from Burnt Oak, Kenton and Kingsbury in the north, to Harlesden, Queen's Park and Kilburn in the south.
- 3.2 The borough is famous for being the home of the National Stadium at Wembley; an internationally renowned venue, principally associated with football, but also other sporting events and concerts. This was rebuilt and reopened in 2007 and its distinctive 315 metre-wide and 133 metre high arch is visible across London.
- 3.3 Brent is bordered by the London Boroughs of Barnet to the east, Harrow to the north and Ealing to the west. It has small boundaries with the inner London Boroughs of Hammersmith and Fulham, Kensington and Chelsea, Westminster and Camden in the south. It also has a boundary with the Old Oak and Park Royal Development Corporation. This is the Local Planning Authority for parts of Brent, Ealing and Hammersmith and Fulham within the Old Oak and Park Royal Opportunity Area. This reduces the area of Brent where the council is the Local Planning Authority by approximately 200 hectares.
- 3.4 Overall, Brent's population is relatively young with about a quarter of its residents aged 18 years or under. In 2018 Brent's population was 334,700. As is common with most of London, this has been subject to extensive increase, rising by 28% since 2001. Black and Ethnic Minorities collectively constitute the majority of Brent's population. With over 149 languages being spoken, it is recognised as one of the most ethnically diverse places in England. Brent's successful designation as London Borough of Culture 2020 was principally on the basis of its people and activities they undertake.
- 3.5 The fortunes of all parts of the borough depend now, as much as ever, on the prosperity of London as a whole. London's success and position as a leading world city has meant that there has been significant investment in the borough more recently. It also points to continued likely significant increases in population and growth in its economy. In Brent therefore the future would appear to be a positive one of planning for growth and the challenges and opportunities that this might bring, particularly in improving the prospects of its residents and businesses.

Spatial Development Patterns

- 3.6 The borough in terms of its character can essentially be split into two; north and south of the North Circular Road. The south was substantially developed between 1890 and 1910. This saw the addition of terraced houses for workers in industry and services, as well as a small number of estates of larger houses around Kilburn. Characteristic of most development of this time, densities are reasonably high with residential and non-residential uses more likely to be mixed together. Open space is more limited in terms of its scale of provision and more likely to be focused in formal spaces such as parks.
- 3.7 The north of the borough was predominantly built out in the 1920s and 1930s as 'metroland' accompanying the growth of rail and underground services. This was essentially of a lower density residential suburban nature. It has greater segregation of land uses; planned more around movement by car with more generous incidental open space, tree planting and parks and open spaces.
- 3.8 Brent's economic base, especially its town centres, other office locations and manufacturing sector have been subject to extensive restructuring and rationalisation. In the period 1971-2008 approximately 26% of jobs were lost in the

borough¹. Spatially this resulted in vacant and underused land and buildings needing to be addressed through regeneration and repurposing. In addition, the housing, environment and quality of life on numerous council estates was so poor that the only realistic solution was wholesale regeneration. This started to occur in earnest in the mid/late 1990s. For some estates such as Stonebridge, this is a process that is now coming to an end, although others still require improvement.

- 3.9 Taking account of these factors the principal focus on development activity over the last decade or so has been within Brent's Growth Areas: Alperton, Burnt Oak/ Colindale, Church End, South Kilburn and Wembley. These areas have delivered the majority of new homes and jobs required to support population growth. There are however still employment and residential areas that are not reaching their full potential in a manner consistent with the criteria that were used in identifying the current Growth Areas. This points to new large scale regeneration opportunities within, adjacent to, or through the creation of new Growth Areas.
- 3.10 The borough's town centres, although continuing to provide a local service, are losing market share to adjacent centres. Some of these such as Westfield Shepherd's Bush or Brent Cross contain retailers' flagship stores, have or are about to expand significantly, and are climbing up London's retail hierarchy. The extent of the challenge of these competing centres is such that despite the opening of the extensive London Designer Outlet in 2015, Wembley's market share of Brent residents' spend has continued to ^{MiM1} decline over the last decade.²

The challenges are to:

- a) encourage comprehensive planned regeneration of Brent's existing and new Growth Areas to provide high quality mixed use environments**
- b) overcome the blockages that have meant some Growth Areas have not been subject to the levels of investment/ growth that was anticipated, e.g. Church End**
- c) better meet Brent's shopping needs locally within the borough by improving town centres, whilst facing market realities and recognising managed reductions in the size of some centres will undoubtedly be necessary**

Design

- 3.11 The council has more recently placed a greater emphasis on improved design in recognition of the value that it creates in improving quality of life and the likely recurrence of significant problems. It has updated its design guidance, provided better design advice in masterplans and requires the use of a design review panel on major developments.
- 3.12 It has also led by example on developments such as the award winning regeneration of South Kilburn. This has sought to improve housing quality and standards, providing accessible and inclusive high quality design in a high quality public realm. Tall buildings have historically been rare in Brent, but have started to appear in greater numbers. The area around Wembley has previously been specifically identified as a preferred location, with additional potential in some of the Growth Areas. The need to provide additional homes and jobs, aligned with policies in the London Plan has required higher densities in many areas. Increases in the number of

¹ London Boroughs: Borough by Sector, Jobs, Date and Methodology GLA Economics Working Paper 92

² Brent Retail and Leisure Needs Assessment September 2018

homes and the amount of employment floorspace required to meet future population growth ^{MiM²} will mean that this trend will need to be continued. This will create areas with a different character to the adjoining suburban areas, but which will need to complement, rather than undermine them.

The challenges are to:

- a) continue to make good design the norm and raise overall quality**
- b) identify where tall buildings are appropriate and their acceptable heights**
- c) create high quality, mixed use higher density environments that fit well into the surrounding suburban context**
- d) manage potential for evolution of character of some suburban locations which are not designated heritage assets**

Housing

- 3.13 Over the past 5 years (2014/15-2018/19) Brent has delivered 6,334 additional dwellings of which 1,592 (25%) were affordable, plus 2,216 bedrooms of student accommodation. London Plan targets now requires Brent to provide ~~29,150~~ 23,250 new homes from 2019/20 to 2028/29. This is equivalent to one new home being built for every ~~4~~ five ^{MiM³} that exist currently. Brent has a high degree of household overcrowding (29.6%). As such there is a need for larger family accommodation, with 65% of additional homes needing to be 3 bedrooms or more. The affordability of homes is a significant issue with the average house price now 16 times the average income. 2,945 households are living in temporary accommodation. This points to an identified need for 46% of new homes to be affordable, particularly those at or around the equivalent of council housing rent levels.
- 3.14 There has been a 65% increase in number of households in privately rented homes in the last decade, with now over 30% of households in that accommodation³. Most of this has historically been provided through small-scale landlords, with varying degrees of quality. Larger institutions are now becoming significant investors in private rent and the majority of Wembley Park will be delivered through this model. It is estimated that approximately 14,500 homes are Houses in Multiple Occupation⁴; homes shared by two or more households. Whilst this clearly meets a housing need, particularly high concentrations can cause concerns to residents through adverse environmental and anti-social behavioural issues. The population of Brent also includes many older people; this will bring the need for specialist housing to meet their needs. Good connections to central London have resulted in investment in student accommodation and the indications are that there will be sustained demand for additional bedspaces.
- 3.15 In moving forward there will be a need to provide mixed and balanced communities. This will build better social cohesion and improve residents' health and life quality. Such communities are less likely to require future large scale intervention in terms of large-scale demolition and rebuild as is currently occurring on the South Kilburn estate.

The challenges are to:

³ ONS Census 2011 Brent Profile

⁴ Brent SHMA August 2018 ORS

- a) **meet and ideally exceed London Plan targets, comprising more affordable and more family housing to meet Brent and also wider London needs;**
- b) **ensure development that is mixed in use and mixed in tenure;**
- c) **meet affordable and specialist housing needs such as older people's housing; and**
- d) **regenerate existing poor quality housing stock.**

Social Infrastructure

- 3.16 Over the last 20 years much of the borough has undergone significant regeneration, improving prosperity and life chances. There are however parts that still suffer high levels of social and economic disadvantage. Nationally, Brent is ranked 68th most deprived out of 356 areas in the Indices of Multiple Deprivation (IMD) 2015⁵. The neighbourhoods experiencing the highest levels of deprivation are largely located in the south around the Harlesden, Neasden, Stonebridge and South Kilburn areas. South Kilburn which has and will continue to undergo extensive change has been recognised as a model for estate renewal. The diversity of the population however also gives rise to specific needs. These include providing a wider range of community and cultural facilities.
- 3.17 In terms of education, the borough does record an above-average share of pupils achieving five or more GCSEs at grades A* to C. 97.5% of primary and secondary schools in Brent have been graded as Good or Outstanding by Ofsted.⁶ There has been extensive investment in school capacity recently which has resulted in sufficient primary school places available for the short to medium term. However, to support new residential development, current projections indicate a new primary school will be required in Wembley Park by 2023. There are ~~however~~^{MM2} projected shortages of space for secondary pupils which will require provision of the equivalent of two additional secondary schools by 2023/24.
- 3.18 Despite its more recent good GCSE attainment, Brent has a low 'skills' profile for working-age residents. Over one third of the working-age population falls into the 'skills poverty' category (below NVQ Level 2), with only a small share (40%) into the high-skills' category (NVQ Level 4 or above) relative to the London average (52%).⁷ As such there is a need to provide further education for the working-age residents to help uplift the ^{MiM4} economic base of the borough. A reported 9,900 working age people in Brent are unemployed. At 5.7% this is slightly higher than the 5% for London as a whole. As such there is a need for additional jobs, but also a greater link between those jobs, local employment schemes and strategies to improve Brent's skills base.
- 3.19 In terms of health, Brent has some headline challenges. For example 38% of children aged 10-11 are classified as overweight/ obese. 33% of the population are inactive, which is amongst the highest in England (305 worst out of 326) and more than twice as high as Camden.⁸ It is anticipated that these characteristics will contribute to 15% of the population having diabetes by 2030.⁹ In terms of indoor sports facilities, the Council's Indoor Sports and Leisure Needs Assessment identified provision is

⁵ 2015 English Indices of Multiple Deprivation 2015 Data for London MHCLG

⁶ 2017 Brent School Place Strategy 2014-18 Update June 2017

⁷ 2017 ONS Annual Population Survey

⁸ Sport England Active Life Survey 16-17

⁹ Brent Better Care Fund Plan 2017-2019 Brent Council & Brent CCG 2017

significantly below needs. Swimming pools are between ¼-½ of the provision per head of population in adjacent boroughs¹⁰. There is also the need for additional sports halls. The Council's Playing Pitch assessment identified that for some sports, additional pitches are required.^{MM2} This under provision is partly reflected by the levels of sports participation and physical activity across the borough.

- 3.20 Acute health care in Brent is primarily provided at Northwick Park and Central Middlesex Hospitals. These suffer from capacity issues related to dealing with non-acute cases and bed-blocking. Brent Clinical Commissioning Group is aiming to create a capacity shift in care settings, with primary and community care settings taking on more services from the acute setting. This will be through a number of changes, including: local hospitals offering a range of out of hospital services; hubs/health centres offering a range of services; and networks of care, formed of GP practices enhancing the capacity of primary care to delivery^{MiM5} out of hospital services. There needs to be improved care of older people with appropriate support so that they can leave hospital earlier when no longer needing acute care. There will also be a need to amalgamate and provide better premises for existing practices so that they can better meet health care needs of an expanding population.¹¹

The challenges are to:

- a) ensure suitable places particularly for secondary education in new and existing schools are provided when needed;**
- b) provide health care facilities that will meet current needs whilst having the capacity to expand for growth generated by new developments; and**
- c) ensure that the provision of social infrastructure meet the needs of our diverse community against a background of significant population growth.**

Economy

- 3.21 There are now 141,000 jobs in the borough.¹² Since 2008 job numbers have started to rise. This follows a significant decline (27%) in the number of jobs in Brent from 1971 to 2008, reducing the loss percentage from 1971 to now to 17%.¹³ Brent's economy diverges from the rest of London. This has an impact for employee earnings. The average weekly wage is £576.20, well below the London average of £692.50. Brent has a greater reliance on manufacturing, wholesale and retail trade/car repairs, transport and storage and human health and social work activities. It has much less representation than London in white collar jobs, in particular in professional, scientific and technical activities.
- 3.22 Brent has good connections to central London. Like many outer London boroughs however it has not more recently been recognised as an investment priority as an office location. The majority of office development activity has been associated with the loss of space, most of which was effectively redundant, through conversion to residential use. The exception to this in terms of new provision is at Wembley Park where new high grade offices have or are being been^{MiM6} built. Much of this space has accommodated existing occupiers moving out of old stock, rather than attracting new firms to the borough. The council has introduced an Article 4 direction to

¹⁰ Sport England National Facilities Planning Model 2017

¹¹ Brent CCG Estate Strategy 2015

¹² ONS Jobs Density 2016 via Nomis Labour market Profile

¹³ London Boroughs: Borough by Sector, Jobs, Date and Methodology GLA Economics Working Paper 92

prevent inappropriate development of office and employment uses to residential that could undermine the area's economic performance.

- 3.23 Although it has not been subject to high levels of recent investment, the remaining industrial stock currently appears generally fit for purpose for the businesses occupying it.¹⁴ There are low levels of vacancy. The environmental quality of industrial areas is generally poor and something to be improved to encourage investment from firms in sectors that are not well represented in Brent. Due to large-scale releases of employment land, shortages of space across London are starting to push up demand. At a West London level, due to predicted demand, ~~the Greater London Authority has identified that Brent should 'provide capacity' for~~ there is a need for additional industrial floorspace, particularly that for storage and distribution purpose and some of this is within Brent. The borough does have an entrepreneurial population; VAT registrations indicate a growth in companies that is 60% above the London average. It is anticipated that overall the number of jobs in Brent will increase by 0.39% or 550 jobs per year.¹⁵

The challenges are to:

- a) **better meet Brent's shopping needs locally within the borough by improving town centres, but facing market realities such as recognise and adapt to likely impacts of on-line retailing and recognising managed reductions in the size of some centres will undoubtedly be necessary;**
MiM7
- b) **retain or deliver lower cost office/ employment premises to assist small business creation/ development;**
- c) **improve the efficient use of land and increase the amount and quality of the industrial stock and the environment of industrial areas to help maintain jobs and improve their provision and numbers; and**
- d) **assist residents in accessing higher quality jobs through training and pathways into work.**

Heritage and Culture

- 3.24 As indicated, much of Brent's development occurred in the interwar years. As such compared to many inner London boroughs which were extensively built prior to then, it does not have a high number of designated heritage assets. It has just over 200 nationally listed buildings, a small number of archaeological sites and 22 conservation areas, which cover approximately 7% of the borough. The National Stadium is a cultural icon but currently has no designated heritage asset status. A number of views of the stadium are locally protected so that it retains its prominence.
- 3.25 Brent's recent rich cultural diversity is reflected in particular through the recent addition of a number of highly crafted places of worship, the largest and most recognised of which is BAPS Shri Swaminayan Mandir temple, Neasden. Whilst it does have some other recognised features such as cultural buildings and Wembley and Kilburn's night time economy, Brent's designation as London Borough of Culture 2020 was principally on the basis of its people and activities they undertake. Cultural and creative spaces face significant financial challenges, difficulties finding new sites together with potential displacement from competing higher value land uses.

The challenges are to:

¹⁴ Brent ELR 2015 AECOM

¹⁵ GLA Employment Projections by Borough 2017

- a) **ensure that all development is of a high design quality and constructed from quality materials, reflecting the need to preserve or enhance heritage assets and the character of places; and**
- b) **that sufficient places exist for the cultural diversity of the population to be able to be accommodated and ideally showcased**

Green Infrastructure and Natural Environment

- 3.26 Brent has a limited number of nationally recognised ecological and built-environment designations. It has a Site of Special Scientific Interest at Brent Reservoir and Local Nature Reserves at Welsh Harp, Fryent Country Park and Mason’s Field. In addition, it has Sites of Importance for Nature Conservation, which mostly follow linear transport corridors, such as railway lines and the Grand Union Canal.
- 3.27 Currently when compared to London standards, overall the borough lacks open space, particularly in the south. The quality of provision also varies. Whilst Brent has some parks and open spaces recognised as being of sufficient high quality to be able to attain the green flag standard and win other awards, it also has some that don’t perform so well.¹⁶ A growth in population will provide additional challenges with regards to accessibility standards. New development will provide opportunities for investment, improving the setting and use of existing spaces. Nevertheless, additional open space will also be required in association with new developments and on strategic development sites in particular.
- 3.28 As with the provision of indoor sports facilities¹⁷, for a borough that hosts the National Stadium, the provision of outdoor sports facilities¹⁸ to which there is access by the general public is weaker than it should be. Improvements are needed for the provision of football pitches and tennis courts.

The challenges are to:

- a) **provide a greater range of open space and outdoor sports facilities for the growing population through maintaining and improving existing and providing additional facilities; and**
- b) **develop an approach which can accommodate a population increase through provision of some new spaces and not compromising important open space and ecological designations.**

Sustainable Infrastructure

- 3.29 Climate change threatens to damage our natural and built environment. Much of Brent is covered by an Air Quality Management Area, principally related to pollution caused by vehicles. Homes and businesses in parts of the borough adjacent to the River Brent are also under potential threat of flooding. Surface water and sewerage flooding as a result of extreme rainfall events are also a risk. More predicted extreme environmental events have to be taken into account in the design of new development. Predicted rises in temperature potentially will create overheating of buildings and places.
- 3.30 Brent must develop an approach which can accommodate a population increase without exacerbating existing localised environmental problems. Related to design it is important to deliver high quality buildings that reduce the need to use natural

¹⁶ Brent Open Space Audit 2018 Keep Britain Tidy

¹⁷ Brent Council Indoor Sports and Leisure Facilities Needs Assessment November 2018

¹⁸ A Strategic Approach to Playing Provision in Brent December 2016^{MiM8}

resources in the longer term, and deliver spaces and green infrastructure to build a sustainable and enduring environment.

- 3.31 As well as the buildings, landscape and public realm plays an important part in improving environmental quality, e.g. tree planting, Sustainable Urban Drainage systems and living roofs. The same is true of the future use of resources (energy, water and waste) in balancing population growth and ensuring a good environmental quality. Securing on-site renewable technologies, drainage technologies to reuse and recycle water, sustainable waste facilities to recycle and recover waste, is important for all developments. It will reduce longer term costs to residents and businesses and also the need to find sites to manage and dispose of waste.

The challenges are to:

- a) **ensure that all new developments incorporate sufficient features and associated infrastructure to help reduce the potential for and the need to adapt to climate change.**

Transport

- 3.32 Overall Brent is well connected with good transport links including more mainly radial rail and underground stations than any other borough in London, with many bus routes which serve town centres within and outside the borough. Whilst to the south access to public transport is high, for some areas to the north accessibility is very low. This combined with good access to radial and orbital roads especially the Strategic Road Network means that northern parts of the borough have a greater reliance on the car. The North Circular Road is a significant road for London and is important for business connectivity in Brent. It however is severely congested at peak times. It has significant adverse impacts on communities in terms of severance, pollution and noise. Its will be used 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. Transport for London predict that the ULEZ 2021 will reduce air pollution in Brent by NO2 by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular.^{MM2}
- 3.33 Strategic transport improvements will occur adjacent to the borough at Old Oak with the provision of a HS2/ ~~Crossrail~~ Elizabeth Line interchange station (2026), a new station at Brent Cross West Thameslink (2023~~2~~) and potentially the West London Orbital with ~~an~~ additional stations at Harlesden and ^{MiM9} Neasden (2026). These will increase public transport accessibility and use and provide focal points for development in the adjacent areas. More recently in areas with good access to public transport, the council and developers have been promoting car free developments. This trend will continue with better management of on-street car parking to encourage alternatives to car use and reducing unnecessary short trips.
- 3.34 Much investment is still needed to improve stations and their respective interchanges with other modes, but particularly to improve service frequency. In order to stimulate the necessary regeneration, as well as provide for the demand created by new development, it is important that public transport services are of a good quality and are able to meet the needs not only of residents, but of visitors and those working in the borough. The Mayor has indicated greater prioritisation of investment in bus services in outer London to support growth. Furthermore, accessibility to these transport links should be combined with safe walking and cycling routes in order to enhance the usability of Brent's transport infrastructure and its sustainability.

3.35 In addition to these common transport modes, Brent also has the Grand Union Canal which can be promoted as a means of passing freight through and to the Park Royal area. This can also be combined with walking and cycling routes to increase its usability by residents, visitors and those working in the borough.

The challenges are to:

- a) encourage housing and commercial growth without increasing the reliance on private cars for journeys which originate within the borough;**
- b) encourage new developments that will have good access to public transport;**
- c) improve and increase safe walking and cycling routes to encourage their and public transport use within and to Brent;**
- d) improve and encourage the use of the canal system for freight and transport to and from the Park Royal area, and**
- e) support the delivery of the West London Orbital passenger route and associated infrastructure.**

Development partnerships and infrastructure

3.36 In terms of planning for the future, the council must work and liaise with providers of social and physical infrastructure, such as Network Rail, Transport for London, utilities providers and its neighbouring boroughs and developers in order to achieve the right spatial arrangement of infrastructure as the borough's population grows. School pupils and healthcare facility users tend to cross borough boundaries, therefore working with neighbouring boroughs as well as education services and health providers is prudent. Outside of its housing estates, the council has relatively little in the way of a property portfolio that can be regarded as developable land which would allow it to exert control as a landowner. It therefore needs to work together with strategic development partners (as is happening at Wembley) such as the Greater London Authority, Transport for London, NHS, home builders and Registered Providers (RPs) to bring forward regenerative development and secure appropriate infrastructure.

The challenges are to:

- a) work with neighbouring boroughs where there is an overlap in infrastructure use; and**
- b) build strategic partnerships with developers and other agencies to bring forward beneficial development with appropriate infrastructure without having control through land ownership.**

4 Development Vision and Good Growth in Brent

DEVELOPMENT VISION ACHIEVING OUR POTENTIAL

Brent will continue to be a great place to live and work. Brent will welcome change and good growth concentrated in accessible areas that better delivers shared prosperity.

This Local Plan will ensure a future built for everyone through regeneration to grow the local economy, improve health and well-being and provide the jobs, homes, transport, green spaces and cultural assets that people need.

Figure 6 Brent Key Diagram

How will Good Growth in Brent Be Delivered?

- 4.1 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

- a) 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
- b) 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
- c) Create a more equal and affordable borough, where the opportunities to access good quality housing, employment, education, digital connectivity and culture are maximised
- d) Strengthen the existing sense of community by celebrating Brent's diversity, heritage and culture, and creating places where Brent's community can meet
- e) 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;~~^{MM3}
- d) 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.

POLICY DMP1 DEVELOPMENT MANAGEMENT GENERAL POLICY

Subject to other policies within the development plan, development will be acceptable provided it is:

- a) **of a location, use, concentration, siting, layout, scale, type, density, materials, detailing and design that provides high levels of internal and external amenity and complements the locality;**
- b) **satisfactory in terms of means of access for all, parking, manoeuvring, servicing and does not have an adverse impact on the movement network;**
- c) **provided with the necessary physical and social infrastructure;**
- d) **conserving and where possible enhancing the significance of heritage assets and their settings;**
- e) **maintaining or ~~and~~^{MM5} where possible enhancing sites of ecological importance;**
- f) **safe, secure and reduces the potential for crime;**
- g) **not unacceptably increasing, and where possible reducing, exposure to flood risk, noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality;**
- h) **retaining existing blue and green infrastructure including water ways, open space, high amenity trees and landscape features and providing appropriate additions or enhancements where possible; and**

i) resulting in no loss of, and where possible enhancing, community facilities or other land/buildings for which there is an identified need.

Justification

- 4.2 The council has a positive attitude towards development and the potential benefits that it can provide to residents, businesses and visitors. Brent seeks to support the presumption in favour of sustainable development within the NPPF. To reduce the potential for repetition of policies within the Brent Local Plan, a general Development Management Policy is included. To also assist people not particularly familiar with the planning process this also gives a broad overview of issues that developments should address and seek to satisfactorily resolve prior to a planning application being submitted and subsequently being approved.
- 4.3 In considering the appropriateness of developments a number of factors as outlined in the policy may be applicable, whilst for some, relatively few will apply. A number of the criteria are inter-related. For each criterion there is also likely to be more specific policy considerations in the NPPF and associated Planning Practice Guidance, the London Plan with associated Supplementary Planning Guidance^{MiM10} and the Brent Local Plan and associated Supplementary Planning Documents.
- 4.4 Where approved, the impact of the majority of developments is likely to be controlled through approving a set of plans, along with a limited number of associated conditions. For larger scale developments the number of conditions is likely to be larger with potential additional information needing to be supplied prior to commencement or occupation of the development. In a small number of cases legal agreements between the developer and the council (and others) might be required to ensure that certain actions or payments are undertaken to make a development acceptable. The council aims to ensure that development complies with appropriate national and local planning policy and guidance through effective enforcement action. Enforcement action will be considered against unauthorised development and will be guided by national guidance and the priorities set out in the Brent Enforcement Plan which includes a test of expediency.
- 4.5 Some uses have specific policy that prioritises their direction towards certain locations, e.g. main town centre uses within town centres; others in principle might be appropriate in a wider variety of locations, e.g. residential. Whilst an individual development of a particular use might be acceptable, a concentration of the same or similar uses might not be, for example if giving rise to potential increases in antisocial behaviour, or exacerbating an adverse environmental issue.
- 4.6 In relation to the siting, layout, scale, type, density, materials, detailing and design of a development, the surroundings of the site will be an important consideration and in particular, the quality of the development and how it would relate to existing buildings and spaces together with its impact on neighbouring occupiers. In areas with a set of consistent characteristics that create a sense of place this does not necessarily mean a slavish reproduction of existing styles or architecture. Modern interpretations based on a demonstrable appreciation of local context can add variety and interest to complement rather than detract from the attributes of recognised high quality areas. For those in the development and neighbours it is important that the development creates a high quality environment, addressing issues like spaces between buildings, privacy, outlook, daylighting, shadowing, micro-climates and amenity space.
- 4.7 The accessibility of a development is a fundamental component of its success. From an equalities perspective development should be as accessible and easily navigable

- as possible to individuals whatever their characteristics. In addition, movements by walking, cycling and public transport should be maximised and functioning of existing movement networks not undermined. Parking, accessibility and servicing of new buildings need to be fit for purpose in terms of amount and layout.
- 4.8 Development will be expected to provide any associated infrastructure required to make it acceptable from a planning perspective. This includes elements such as on or offsite physical infrastructure for example transport improvements, water and sewerage infrastructure, surface water drainage or social infrastructure such as additional capacity in schools or health practices.
- 4.9 Heritage assets include a wide variety of statutorily designated and non-designated features. Some are protected by law and cannot be materially altered without consent, e.g. listed buildings and scheduled monuments. This statutory protection together with national planning policy also places a legal duty on the council to seek to preserve or where possible enhance the significance of such assets and their settings. As such, developments affecting a heritage asset will be required to show that it seeks to preserve or enhance its significance and its setting. Extensive archaeological priority areas of Brent are identified and similarly in such areas developments should seek to identify potential assets and avoid their harm.
- 4.10 Similarly with ecological sites, some have statutory designations, e.g. Sites of Special Scientific Interest whilst for ecology in general other legislation statutorily protects flora and fauna such as bats and nesting birds. The emphasis is on protecting and ideally where possible enhancing these types of features.
- 4.11 Developments should be safe and not expose users or those in neighbouring areas to an unacceptable risk of danger. In seeking to limit the potential for crime the preference is through good design related to factors such as the layout, use, building orientation and materials, passive surveillance, active frontages as well as security deterrents such as locks, fences, alarms and CCTV.
- 4.12 Developments should ensure that they do not create unacceptable exposure to adverse environmental factors to users/ occupiers and those in surrounding areas. National policy seeks to steer development away from areas of flood risk (from rivers and others sources), unless exceptions can be justified. Developments should also control water output to ensure flood risk to other areas is not unacceptably increased. In both cases, where possible, flood risk should be reduced. Similarly, this approach applies to a range of other potential environmental factors which will have to be controlled by, for example, location away from receptors, or physical measures to bring potential impacts to acceptable levels. In the case of a takeaway introduced into a shopping parade with residential properties above, this could require filters and positioning of extraction fans/flues to reduce the impact of noise, smells and diminished air quality, whilst limits on opening hours might be required to regulate general disturbance from patrons at night.
- 4.13 Environmental assets such as blue and green infrastructure enhance the appearance, quality and bio-diversity of Brent, provide a recreational resource, improve air quality and reduce the potential impacts of climate change. As such wherever possible and in particular where they are of high quality they should be retained. In addition to this, developments are encouraged to take every opportunity to provide additional features or where adjacent provide extensions to or enhance the setting of such features.
- 4.14 Brent's predicted increase in population size, along with its continuing trend for increased diversity will put pressure on the capacity of supporting community facilities. This allied to the need to provide new homes and employment

opportunities means that community facilities which have a low monetary value may be under-pressure for redevelopment for higher value uses. Communities have the potential to identify Assets of Community Value. In addition to this in Brent, emphasis will be placed on ensuring that such community facilities are not lost where they meet or could meet a potential need and ideally enhanced to address these needs.

Detailed site policy and development capacity identified.

- 4.15 A greater level of detail of planned change that can be specific to particular sites is set out within the seven Places in the next chapter. Please note that within these chapters all the development capacities in Growth Areas and site allocations are indicative. Most are a high level assessment based on an understanding of the opportunities and constraints and use of typical densities when the plan was drafted based on the prevailing policy context at that time. Planning permissions on sites may subsequently vary capacity up or down due to the more detailed analysis that is undertaken at that stage and potentially changes in higher level policies or circumstances. Meeting indicative capacities should not be used to justify over-riding other policies where it would result in creating poor developments. Similarly, high quality schemes that meet other development plan policies should not be expected to reduce development to be consistent with indicative capacity figures.

5 Places

5.1 Central

Figure 8 Map of Central Place

- 5.1.1 The Central place includes parts of Barnhill, Preston and Tokyngton wards. Its town centres are Wembley Park and part of Wembley. The Chiltern line runs along the southern boundary passing through Wembley Stadium station. Barn Hill conservation area forms the northern boundary whilst the Chalkhill estate and Wembley Stadium Industrial Estate lie to the east. The Wealdstone Brook runs through the Central place.

Character & Culture

- 5.1.2 The Jubilee/Metropolitan line bisects this place and both sides have very different characters. The north is predominantly metroland suburban residential comprising the 1920s/1930s detached and semi-detached houses of Barn Hill conservation area and the later developed Chalkhill estate. The south has some element of typical metroland character to the west of Empire Way, but to its east is very different. Historically it was predominantly industrial land around the Wembley stadium following the closure of the Empire Exhibition in 1925. A significant part of the area has more recently been undergoing a transformational change following completion of redevelopment of the national stadium in 2007. This has resulted in a new Wembley Park development, a high density mixed use neighbourhood of contemporary designed tall buildings predominantly of new homes, but also hotels, student accommodation, library, civic centre, offices and retail/leisure.
- 5.1.3 The eastern fringe between the national stadium and north circular road consists of small scale and large footprint industrial units. This is recognised as a Strategic Industrial Location of importance to London. The quality of public realm here is lower, due to its industrial nature, being traffic dominated and providing a poorer pedestrian experience.
- 5.1.4 There are several notable heritage assets including the conservation areas of Barn Hill, Lawns Court and Wembley High Street and listed buildings such as the SSE Arena and the Lycée International de Londres Winston Churchill (the former Town Hall). The national stadium is an iconic structure of national and international cultural significance in relation to football. The cultural importance of Wembley to London as a visitor hub is identified in the London Plan.
- 5.1.5 There are currently no significant open spaces within the Central place, provision is below Brent's average. Chalkhill and St David's are the principal public parks currently. Nevertheless, larger high quality spaces are adjacent such as King Edward VII Park (to the west) and Barn Hill/Fryent Country (to the north). A new 7-acre public park will be delivered as part of the Wembley Park development which will enhance the character of the place. The Wealdstone Brook and River Brent run through this area. Although a good ecological resource, it is heavily canalised in concrete channels along much of its length. It has very limited public access. Buildings are in close proximity, turning their back on it, limiting its environmental and recreational role.

The extensive redevelopment of the area provides potential for its enhancement. Other wildlife corridors are provided along the railway lines.

Transport

- 5.1.6 This area is well connected to the rest of Brent, Wembley Park and Wembley Stadium stations provide access to central London and South Buckinghamshire by both the Jubilee and Metropolitan lines and Chiltern line. Wembley Central station located in the South West place close by, provides access to Bakerloo, Overground, Southern and London North Western trains. It has become a convenient location for commuters and students travelling into central London. The Jubilee Line is now part of the night tube network, providing an opportunity for the night-time economy to grow here. There are significant congestion issues for road traffic on event days at the national stadium or SSE Arena.
- 5.1.7 The major roads in and connecting Central place elsewhere are A4089 Bridge Road/Wembley Park Drive, Empire Way for north-south movement. East-west movement is provided by the A4088 Forty Avenue/Forty Lane and South Way. South Way links the national stadium and Wembley industrial estate to the North Circular Road. These roads are also the principal bus routes. No strategic London walking routes run through Central. Pedestrian routes are essentially street based, with only Wembley Park Boulevard/Olympic Way being pedestrianised. A potential road connection at Bridge Road/North End Road will help address recognised vehicle circulation problems for local residents during events.
- 5.1.8 This area generally has a high Public Transport Accessibility Level (PTAL) of 4 to 6a, particularly around Wembley Park Station and along Wembley Park Drive towards Wembley town centre. It is one of the best connected places in the borough and has potential for significant tourism and evening economy uses in conjunction with the stadium, SSE arena, London Designer Outlet (LDO), Boxpark and Troubadour theatre.
- 5.1.9 Only 1% of journeys in this area are by cycle. The London Cycle Network borders but does not pass through Central. New and planned links branch from Wembley Park along low-traffic routes such as Wembley Park Boulevard, Olympic Way, Chalkhill Road, Brook Avenue and South Way.
- 5.1.10 The volume of visitors creates significant congestion issues on event days. Less private vehicle use, effective vehicle circulation, controlled access and parking restrictions can better address this. Public realm design and junction improvements from Forty Lane through to Wembley triangle will improve legibility, flow and capacity for pedestrians, cyclists and public transport.

Town Centres

- 5.1.11 This place has two designated town centres, part of Wembley (which also continues in the South West place) and Wembley Park. Wembley Park contains a selection of smaller, independent shops along Wembley Park Drive. It encompasses a number of service uses such as a launderette, pharmacy and estate agents. It includes the highest proportion of night-time economy uses of all town centres in Brent. The new Troubadour Theatre (a meanwhile use before its current site is redeveloped) attracts large productions of West End calibre. The centre also has a diverse selection of inexpensive restaurants, pubs and cafes, supported in large parts by event day visitors. Its offer also caters for the local population. It also has two 'out of town' retail

developments set behind extensive surface car parking; an ASDA superstore and Stadium Retail Park. From a less positive perspective it has one of the highest proportions of betting shops.

5.1.12 Overall, the town centre is considered to be one of the borough’s best performing in terms of occupation. Only two per cent of retail units are vacant, significantly below the borough average and that of London as a whole. Despite relatively high occupancy rates, average rental values are slightly below the borough average. It is likely that as population density increases and the new Wembley Park neighbourhood is built, this will rise.

5.1.13 Wembley town centre in this place essentially comprises the extensive purpose built London Designer Outlet (LDO) shopping centre and ground frontage development along Olympic Way and Wembley Park Boulevard. Aside from its substantial retail offer the LDO provides a wide range of mainstream high street food and drink outlets as well as a cinema. The centre also contains a number of new hotels and new purpose built office floorspace, as well as the significant further visitor attractions of the SSE, Boxpark, Brent Civic Centre and library. Much of this part of Wembley town centre still has to be developed as part of the delivery of the wider Wembley Park masterplan. This will ‘infill’ the gap between the older Wembley town centre, which continues along Wembley High Road, and Wembley Park town centre. Although operating separately, once development is complete, the two should form one contiguous town centre. In recognition of this, the London Plan identifies the emergent single town centre as a potential Metropolitan Centre.

Employment & Education

5.1.14 The Central place is a strategic retail, office and public sector hub with Wembley Park having one of the highest concentrations of employees in the borough. The eastern fringe includes a significant proportion of the borough's Strategic Industrial Land (SIL) which is protected for industrial employment uses. The largest employment sector is public administration, education and health, accounting for a quarter of employment. Significant employers include Brent Council in the Civic Centre, the College of North West London, University College of Football Business (UCFB), the Football Association and Network Homes. It also has a much higher concentration of activity in motor trades, higher tech manufacturing and warehousing and logistics than across London.

5.1.15 Significant new office space, affordable workspace and commercial space is planned as part of the new Wembley Park development consolidating the area’s position as an employment hub. This will help off-set the significant loss of office space in particular that has and will in the short term occur as a result of permitted development to residential uses. The area’s high levels of public transport connectivity make it a prime employment location and affordable workspace provision will allow start-ups to develop. In addition, due to its increasing success the UCFB will be developing a new purpose built campus. The College of North West London is also looking to centre its activities on Wembley Park by consolidating numerous campuses into a single new facility.

Challenges	Opportunities
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- | | |
|--|---|
| <ul style="list-style-type: none"> • East-west travel during events faces significant delays this will need to be further addressed by the proposed removal of the <u>pedestrian ramp (pedway)</u> leading up to Wembley Stadium^{MiM11} • There is currently no significant open space provision in the Central area • Industrial sites in this area are generally underutilised with poor public realm and in poor condition • There is a high percentage of betting shops in Wembley Park town centre • How to successfully merge dense, tall development around the stadium with existing adjacent Wembley Park neighbourhood • There are limited community facilities in the town centre, likely to be exacerbated by significant future population increase • No net loss and maximising <u>employment industrial floorspace</u> in new developments, where <u>there is existing industrial use, is required due to Brent being recognised as a provide capacity borough.</u>^{MM6} • Greater use of the national stadium particularly as a result of commercial potential identified through its potential sale • Limited dwell time by many who attend major events at the national stadium and SSE Arena • Protecting views of the Wembley stadium arch • Poor air quality • Strategic Industrial Location noise, odours, dust, emissions, hours of operation and/or vehicular movements can raise tensions with other land uses and particularly residential development | <ul style="list-style-type: none"> • Continue the new Wembley Park development to create a new neighbourhood for Brent including a new significant public open space and other smaller scale spaces • High PTAL levels could reduce car dependence and allow car-free developments/reduced car parking standards and attract more commercial occupiers/interest • The area is well served by public transport and could benefit from additional cycle routes • The success of existing cultural assets provides a springboard for further cultural and creative assets. • Mixed-use redevelopment of employment sites between the stadium and Wembley Stadium Industrial Estate to create transition/buffer between new residential development and existing SIL • Wembley Park town centre has relatively low vacancy rates and high employment levels • Potential to improve the link between the two town centres through new public space and development and change 'out of town' retail format to complement the offer. • Good potential for evening/night-time economy influenced by events at the stadium, arena and jubilee line night tube. • Two-way working of road networks around the stadium will improve transport links, road safety and the public realm. • Removal of pedway and other public realm improvements along Olympic Way together with potential for better offer in the area overall to retain spend/create a sense of place which encourages more visitors |
|--|---|

	<ul style="list-style-type: none"> • Strengthen role/attractiveness of the use of cycles or walking as a preferred transport option particularly for new residents/business occupiers • Increased tree planting along key pedestrian routes will improve the quality of public space and improve air quality • Greater use of the national stadium, with a demographic encouraging longer dwell time/more local spending • Maximising the potential use of industrial land to further enhance the economic role of the area in the economy • Providing an effective buffer along the length of the SIL boundary
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Figure 9 High Level Plan of the Place Vision More detailed boundaries can be seen on the Policies Map ^{MiM12}

VISION

5.1.16 Wembley Park as part of the wider Wembley Growth Area is set to drive the regeneration of central Brent. It will continue its transformational change to becoming a high quality, high density, highly connected and sustainable city quarter generating thousands of new homes as well as jobs across a range of sectors. Including retail, offices, Brent Civic Centre, conference facilities, hotels, sports, leisure, tourism and visitor attractors, creative and cultural industries and education facilities reflecting its designation as an Opportunity Area and a strategic cluster of cultural attractions for London.

5.1.17 The heart of Wembley will be a series of distinctive mixed-use places connected by a strong pedestrianised commercial spine between Wembley Park and Wembley Stadium stations. Off this will be residential streets, spaces and squares and a major new public park along Engineers' Way. A variety of uses will be introduced to the east of the national stadium to provide a transition from the residential and commercial space around the London Designer Outlet through to the Strategic Industrial Locations further east. The wider Strategic Industrial Location will be protected and where possible intensified for industrial uses, whilst its longer term future, particularly its western edge as an employment led extension of the high density mixed use Wembley Park typology post 2041, will be considered in more detail for development post 2029. ^{MiM13}

5.1.18 New development will build on the cultural heritage of the national stadium and the SSE Arena while the historic Barn Hill neighbourhood will be protected to preserve and ideally enhance its identity, creating a place where the new and existing parts of Wembley interface with one another. ~~Wembley national stadium's use as a venue for the final of Euro 2020 and Brent's status as London Borough of Culture 2020, with its associated legacy opportunities, will be an integral part of improving the place for the future.~~ ^{MiM14}

POLICY BP1 CENTRAL

Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:

Character, Heritage and Design

- 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***
- b) Conserving and enhancing heritage and cultural assets including Barn Hill conservation area, the SSE Arena and the national stadium***
- c) Enhancing the public realm and stadium approach from Wembley Park and Wembley Stadium Stations, which will be reinforced through the removal of the Pedway, whilst creating stronger links between Wembley Park and Wembley town centres***

Homes

- 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***
- 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***

Town Centres

- 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***
- 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***

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

Wembley and Wembley Park town centres to support their future designation as a single metropolitan centre at the London Plan level

~~h) Providing at least one additional food store of between 1,000 and 2,000sqm~~

i) Diversifying the town centre offer to include more cultural and leisure facilities

Employment and Skills

j) Encouraging the intensification of existing Strategic Industrial Locations closer to the North Circular Road

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

l) Increasing the supply of modern affordable workplace developments for the arts and creative industries consistent with Policy BE1^{MM7}

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

n) Providing a new primary school on the York House car park site

Open Space and Biodiversity

o) Supporting the re-naturalisation of the River Brent and Wealdstone Brook and its setting with increased amenity access where possible

p) Creating a new 7-acre public park plus other pocket parks/quality areas of public realm, as part of the Wembley Park redevelopment scheme to serve new and existing communities

Transport

q) Reducing event day congestion/local resident inconvenience by creating a road link between North End Road and Bridge Road by 2020

r) Removing the one-way system to the east of the national stadium by 2020

s) Ensuring that the transportation infrastructure of Wembley is upgraded so that it supports the needs of the local community

t) Promoting access by public transport, bicycle or on foot and encouraging car free/lower parking provision

u) Consolidating the pedestrian/cycle Wembley Park/Wembley Stadium station route along Wembley Park Boulevard/Olympic Way

Justification

(Insert Infographic: Employment land 7%, Conservation area 11%, Open space 14%)

Character, Heritage and Design

5.1.19 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 and Policy BD2 as supported by the Brent Tall Building Strategy.^{MM7}

- 5.1.20 Outside the Wembley Growth Area, there will be opportunity for some additional tall buildings, but of a much smaller scale (potentially around 15 metres or 5 storeys) along intensification corridors. These are main roads such as Blackbird Hill, Forty Lane, Forty Avenue and Wembley Park Drive. Outside of these areas building heights more likely to be more reflective of the existing predominantly two storey local context.

Homes

- 5.1.21 Wembley has seen significant investment, especially around the stadium ~~where the developer Quintain is the main landowner and are taking forward the Wembley masterplan.~~ Development has been at greater densities than envisaged in the 2010 Core Strategy. This, plus the identification of additional sites will increase the Growth Area's potential additional residential capacity to a minimum additional 15,000 homes by 2041.
- 5.1.22 Land along First Way and Watkin Road ~~has previously been allocated for non-industrial development. These sites still provide that an opportunity, but at higher densities than previously identified in the 2010 Core Strategy, whilst also high density residential incorporating on lower floors more employment industrial floorspace. now that Brent is a 'provide capacity' borough for industrial floorspace.~~
- 5.1.23 ~~Outside the Wembley masterplan area~~ There are a number of key sites which could contribute to Brent's housing need. Land either side of Brook Avenue is underutilised and recent development has established a denser character at both ends of the street. It is expected that Wembley Park Station car park is redeveloped to provide a significant number of new homes in line with London Plan guidance on station intensification. In addition, the residential units to the south of the road could be replaced with taller buildings to make better use of the land, reduce flood risk and provide an improved setting for Wealdstone Brook.^{MiM16}
- 5.1.24 ASDA, together with the Kwik Fit/The Torch site has potential to be redeveloped to provide a significant number of dwellings whilst retaining a supermarket. This is due to its size, excellent public transport links and proximity to local shops and services.

Town Centres

- 5.1.25 Convenience retailing floorspace should be directed to Wembley and Wembley Park town centres to alleviate the over-trading of existing food stores currently taking place in the area. The redevelopment of Stadium Retail Park can enhance Wembley's retail offer. It and other sites in the town centres provides the opportunity to re-provide and ideally expand retail floorspace to address identified needs supported in the Retail and Leisure Study 2018. For the Wembley town centres, vitality and viability will be enhanced through ~~6,700~~ 2,100 sqm net comparison goods retail floorspace,

and ~~6,100~~ 4,300 sqm convenience retail floorspace, diversifying the offer through specialist markets and meanwhile uses.^{MM7}

- 5.1.26 The continued expansion of retail/leisure uses particularly in active frontages at ground floor along Wembley Park Boulevard and Olympic Way will provide greater continuity between Wembley and Wembley Park town centres. The improved integration between new developments and the historic parts of the town centres will effectively result in a single continuous town centre with a significant part being in a high quality pedestrianised environment. This connection, plus the addition of floorspace capacity and mix of uses will give the potential for the new single highest-order town centre to be of such significance that it is recognised a metropolitan centre in future London Plans.
- 5.1.27 The Central place is suitable for promotion of the evening and night-time economy due to its excellent public transport links and tourism potential. The restaurants and leisure facilities in the LDO, Wembley Park Boulevard/Olympic Way and Wembley Park town centre will act as a draw to create an eating and drinking destination. The retail and leisure needs study identifies potential for development of further uses which support these functions should conform with Policy BE4 ~~Protecting retail in town centres~~ Supporting Strong Centres, but care should be taken to ensure that the centre's ability to meet day-to-day shopping needs is not reduced along with residential amenity and safety.^{MiM17}
- 5.1.28 Wembley Stadium and the local partners will be encouraged to explore ways to mitigate adverse impacts of event days by exploring support for retailers and other commercial occupiers to help them capture passing trade on match days to support the economy of the area

Employment and Skills

- 5.1.29 The London Industrial Land Demand Study identified Brent as needing to increase capacity across its Strategic Industrial Locations (SIL). The SIL east of Wembley Stadium forms part of a larger industrial site which should be protected to prevent further loss or undermining of the employment land hierarchy. Land at First Way and Watkin Road ~~previously allocated due to its increased potential for high density development, provides greater scope than previously assumed to can help address the need for industrial floorspace~~ Brent's status as a provide capacity borough in the London Plan by incorporating ground floor employment uses.^{MiM18}
- 5.1.30 The close proximity to the North Circular Road provides one of the best opportunities in Brent for the London Plan's industrial intensification policy to be delivered. As such efforts to support this will be undertaken by the council. Towards the east, SIL in the area bounded by development that will occur along First Way/Watkin Road area, London Plan SIL policy E7 will be implemented. ~~If, however there has not been any tangible progress on delivery of intensification by 2029 (either on the ground or via credible developer interest and it is not deliverable due to viability) this area will be actively considered in an update of this Local Plan for co-location/intensification as an extension to the high density mixed use environment of Wembley Park.~~^{MiM19}
- 5.1.31 Historically Wembley has been an area that has a concentration of office development. Much of this has been lost more recently or is about to be lost to residential development as a result of national permitted development rights.

Nevertheless, its connectivity, high central London rents and the development of place-making associated with Wembley Park provides an opportunity for greater market stimulus. The Wembley Park development has the potential to provide more office space through the implementation of planning permissions granted.

Opportunities to provide more office in and around the town centres will be viewed positively. Where permitted development rights for office change of use lapse in areas covered by the Article 4 direction, retention or re-provision of the office space and its enhancement as part of a more efficient use of land which maximises a site's potential will be sought.

- 5.1.32 New small scale affordable workspace has been provided at ground floor level in the more recent Wembley Park developments. Further opportunities will be sought as part of mixed use developments to provide additional space to support economic development for the local communities.

Community and Cultural Facilities

- 5.1.33 Due to high levels of population growth owing to new development there will be a need for new community and cultural facilities. A new primary school on the site of York House car park and community space has planning permission and Quintain have opened the purpose built Yellow pavilion community facility. The provision of Boxpark, Troubadour theatre (meanwhile uses) plus the development of Plot W12 which has permission for further cultural facilities provides the opportunity to further consolidate the cultural offer of the area in the longer term as part of the place making strategy. **MiM20**

- 5.1.34 Improving the night time economy at Wembley Park will support the cultural offer of the area. The addition of affordable workspace has resulted in occupation by artists and makers. The provision of additional space can extend this trend and provide a greater critical mass to make it more of a recognised concentration.

- 5.1.35 Whilst currently not proceeding, the potential sale of the national stadium could provide both opportunities and threats. Whatever the future outcome in terms of an alternative owner to the FA, the process has indicated the commercial potential of the stadium and this is now more likely to be pursued. The Heritage and Culture section of the Local Plan has a specific policy on the stadium to positively address any potential changes.

Open Space and Biodiversity

- 5.1.36 The Central area does not currently contain any significant open space. The creation of a new 7-acre park and other pocket parks as part of the Wembley Park development will alleviate the pressure on open spaces outside the Central area and remove the need to travel to use open space.

- 5.1.37 Within large new developments open space should be provided in line with London Plan and Brent borough standards, offering a mix of green space and community meeting space. Existing small open spaces should be protected and enhanced given the lack of public space currently available in the Central area. Sites of ~~Special Nature Conservation Interest~~ Importance for Nature Conservation such as the Wealdstone Brook and railway corridors provide the opportunity for further ecological enhancement of the place. **MiM21**

Transport

- 5.1.38 The high levels of population growth planned in this area will without mitigation measures place additional pressure on the existing road network, particularly on event days. After the removal of the pedway access to the stadium, east-west road traffic will be closed off on all three existing routes through Wembley Park on event days. To address this, planned improvements to commence in 2020 with the creation of a new road connection via North End Road will allow local traffic to pass. The prioritisation of development close to public transport will reduce pressures on the road network, but require localised improvement measures to support additional capacity. The Western Corridor Study 2018 takes a comprehensive integrated approach to longer term transport solutions for the Growth Area from Forty Lane in the north to Wembley Triangle in the south. The proposed strategy is in line with Local Transport Plan prioritisation of modes. This sets out a number of required investments in enhanced bus services and facilities, improvements to pedestrian and cycling infrastructure, delivering connectivity enhancement to support existing and future residential development around Wembley. This will require interventions on most junctions between the Triangle and Forty Lane/Bridge Road.
- 5.1.39 Where applicable in Central place, land take to undertake any necessary improvements to the movement network outside existing highway land is identified. Land is also required to deliver St. David's Close pedestrian/cycle bridge for future improvements.

(Insert growth area infographic)

Policy BCGA1 Wembley Growth Area

Wembley will continue to drive the economic regeneration of Brent. It will become a high quality, urban, connected and sustainable city quarter generating new jobs across a range of sectors including retail, offices, conference facilities, hotels, sports, leisure, tourism and visitor attractions, creative and cultural industries and education facilities reflecting its recognised potential as a future metropolitan centre and cultural area of significance at the London level.

The council will seek to secure further investment from differing occupiers and commercial uses that add to the town centres' vitality and viability to ensure future growth. A key element to making the centre work will be through ensuring that the physical pedestrian and cycle route linkages from Wembley Triangle to Forty Lane/Bridge Road are provided, as well as into the surrounding development areas, particularly to the east.

Wealdstone Brook's setting and its environmental and recreational benefit will be enhanced through naturalisation of the channel/adjacent land where possible, creation of recreational space provided in the area between the channel and an appropriate set back of development.

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:

- **Junction improvements**
- **New nursery and primary school at York House**
- **Multi-use community centre**
- **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**
- **~~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^{MM8}**

5.1.40 Wembley Growth Area is the Wembley Opportunity Area, as designated in the London Plan. Its designation as an Opportunity Area means that its growth is of strategic importance to the whole of London. It covers an extensive element of the Central place and part of the South West Place and certainly is the major contributor to the majority of the change that will occur in this place. 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.^{MM8}

Key Site Allocations

Wembley Park Station

Watkin Road

Fifth Way/Euro Car Parts

Stadium Retail Park & Fountain Studios

Other Policy Guidance

- ~~Approved Masterplan for Wembley Park relating to Planning Permission 15/5550~~
- ~~Approved Masterplan for the South West Lands relating to Planning permission 14/4931^{MiM22}~~

BCSA1: ASDA/THE TORCH/KWIKFIT

<p>Site Plan</p>	
<p>Existing Use</p>	<p>Supermarket with associated car parking and filling station, public house and Kwik Fit car servicing</p>
<p>Allocated Use</p>	<p>Residential-led mixed-use development</p>

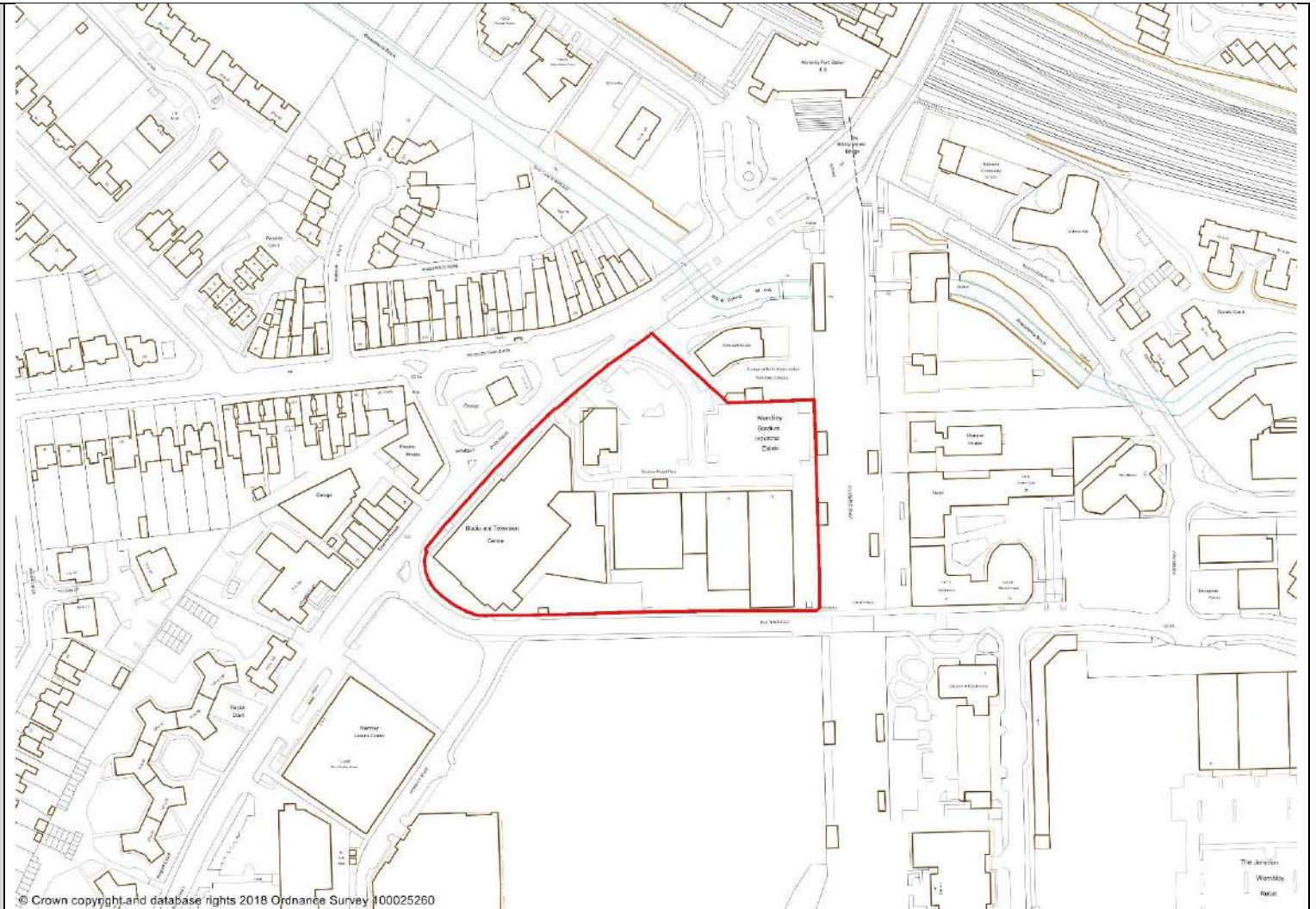
Indicative Capacity	485		
Timeframe for Delivery	0-5 1-5 Years	5-10 6-10 Years	10+ 11+ Years
	20	88 78	377 408
Address	Forty Lane, Wembley, HA9 9EX		
Area	2.79ha (ASDA) and 0.38ha (The Torch/Kwik Fit)		
Description of Existing Site	Site currently comprises a Kwik Fit, Public House and ASDA supermarket 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>		
Ownership	Private		
Planning History	No relevant planning history.		
PTAL Rating	<u>4-5 (current)</u> , 5-6a (2031 estimate)		
Planning Considerations	<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). • There are two vehicular access points to the ASDA site from the A4088 and Opportunities <u>exist</u> 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 <u>the</u> 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 <u>As such</u>, a Preliminary Risk Assessment will be required and if necessary, remediation. • Given <u>the identified need within the Brent's status as a provide capacity</u> borough, the Council will seek no net loss of employment <u>industrial</u> 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. 		

	<ul style="list-style-type: none"> • 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 <u>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</u> • A replacement of public house, pub or community facility D1 use class will be required. • Space for potential junction improvements at Forty Lane/Bridge Road may be required.
Risks	<p>Site is currently occupied by supermarket which is trading well and Kwik Fit meeting their operation needs which may affect willingness of the owners to develop.</p>
Design Principles	<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.
Infrastructure Requirements	<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>

	<ul style="list-style-type: none">• Green and sustainable infrastructure should be part of the development process and the development. MM9
Justification	<ul style="list-style-type: none">• Site is located in an area of high public transport accessibility and large scale ongoing regeneration.• Redevelopment for mixed use retail/residential development would create a more efficient use of land.• The site benefits from accessible green space at the nearby Chalkhill Park and has good access to local shops and services within Wembley Park town centre.

BCSA2: STADIUM RETAIL PARK & FOUNTAIN STUDIOS

Site Plan



Existing Use

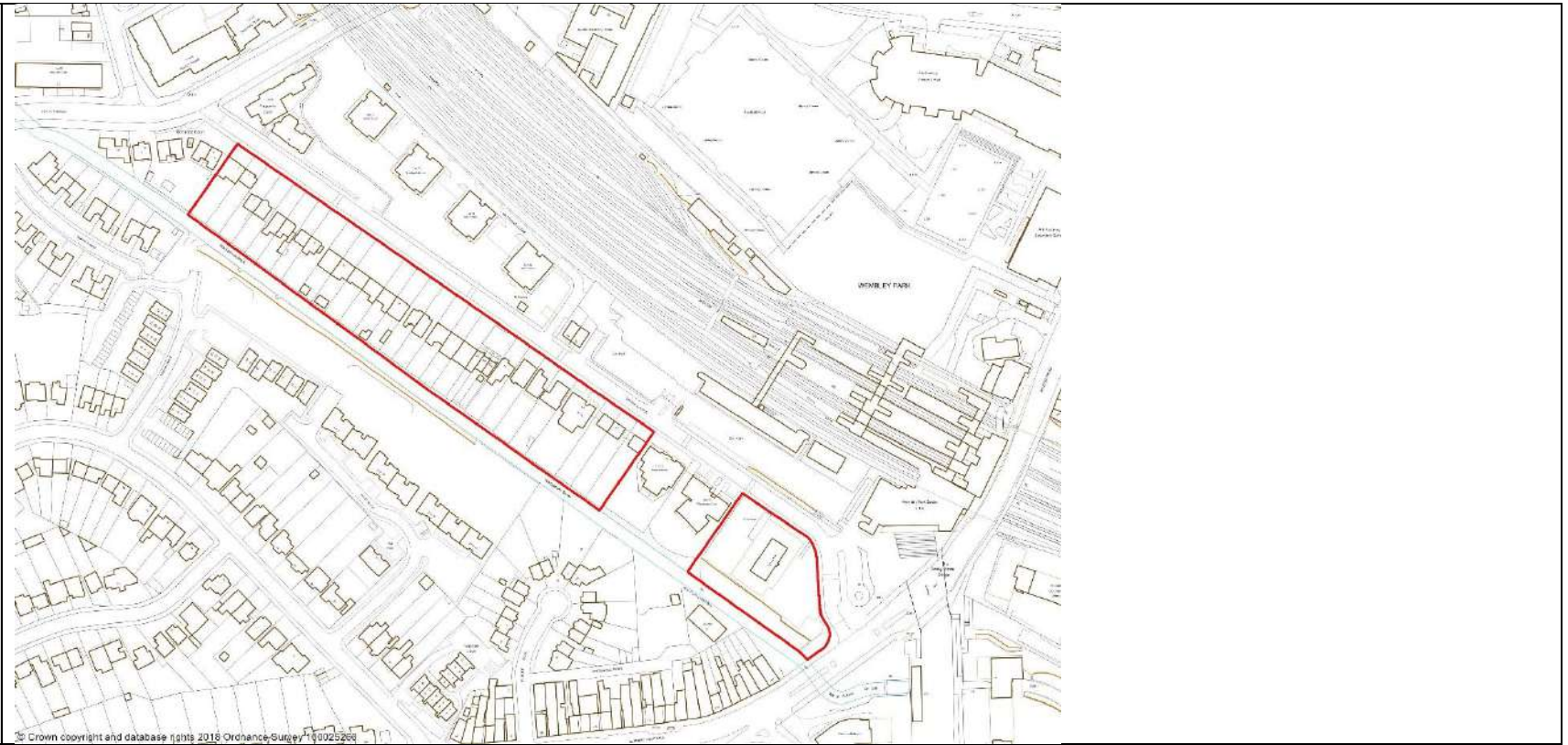
Large retail units and the former Fountain TV studio complex

Allocated Use	Residential-led mixed-use development		
Indicative Capacity	966 homes + mix of commercial, educational uses, leisure and student accommodation		
Timeframe for Delivery	0-5 1-5 Years	5-10 6-10 Years	10+ 11+ Years
		644 966	322
Address	Stadium Retail Park, Wembley Park Drive, HA9 8TS		
Area	1.67ha		
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.		
Ownership	Private		
Planning History	Outline application 17/3059. Proposed development within a series of buildings, ranging from 8 to 25 storeys in height, to A1-A4 Retail and/or B1 Office and/or D1 (Non-Residential Institutions) and/or D2 Leisure up to 6,600 sqm and C3. Associated open space and landscaping; car parking spaces and cycle storage; pedestrian, cycle and vehicle access; associated highway works.		
PTAL Rating	5-6a (current and 2031 <u>estimate</u>) forecast		
Planning Considerations	<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 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. 		

	<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. • 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 <u>2 and 3a</u> and susceptible to surface water flooding. All proposed development will require a detailed Flood Risk Assessment (FRA). <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • The <u>site proposal</u> should take into account the College of North West London site <u>allocation</u> to the north which is also an allocation. Ideally The two sites <u>It</u> should be planned as <u>such one, to that it</u> 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.
Risks	<p>No significant long-term risks identified, <u>however</u> 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>
Design Principles	<ul style="list-style-type: none"> • Building height and massing should build upon the established rhythm in this part of the Wembley Park <u>development regeneration</u> 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 edge. Density should be varied to reduce the number of vulnerable units in high risk areas.

<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"> • <u>The site's town centre location with excellent public transport access offers substantial development potential as an integral part of the wider Wembley development area.</u> • The Wembley masterplan <u>Given the viability and vitality of uses within this town centre location, it is suggested</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 and the close proximity to bus, rail and underground transport interchanges. MM10

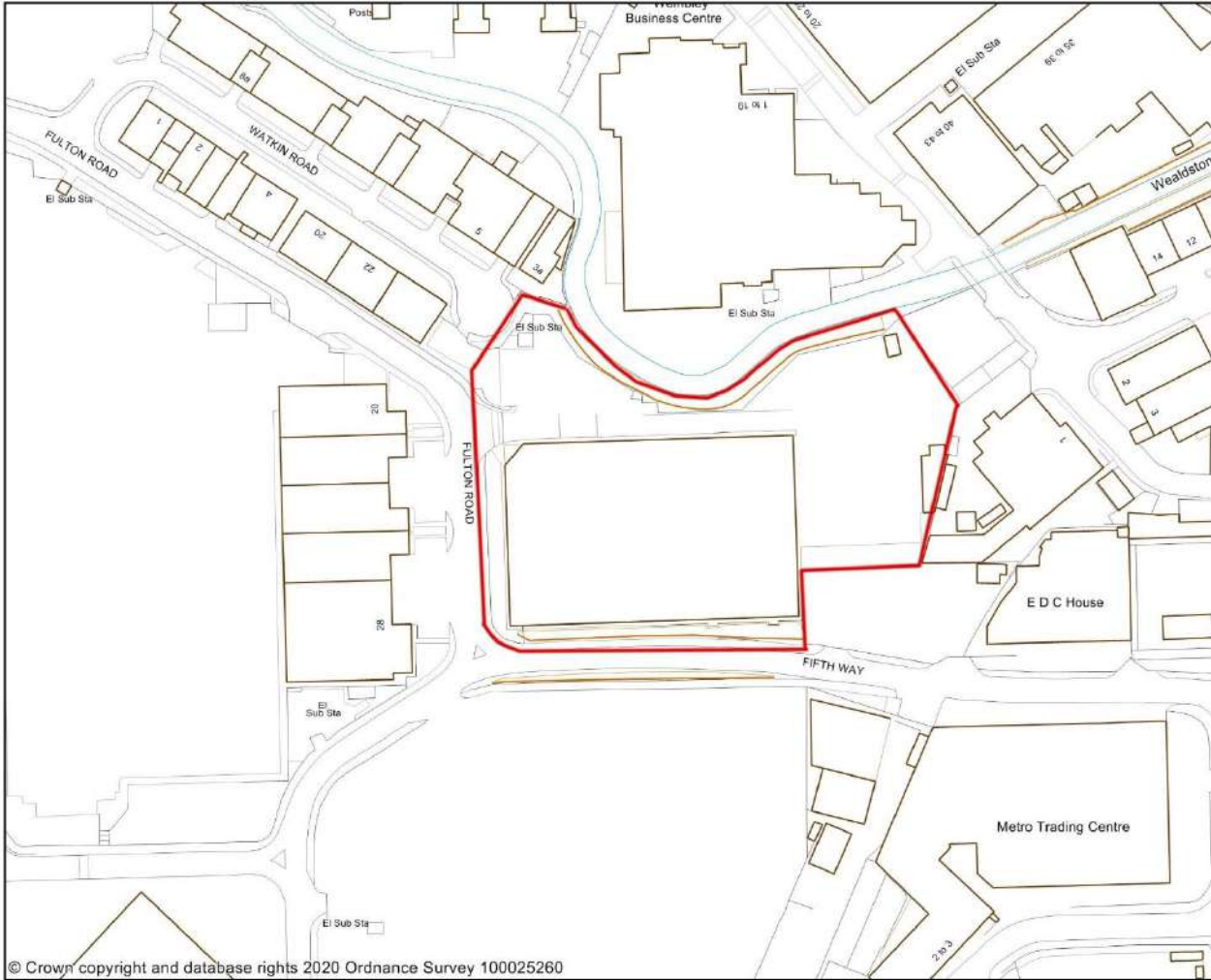
BCSA3: BROOK AVENUE

Site Plan			
Existing Use	Residential		
Allocated Use	Hotel/other main town centres uses/residential on the current Premier Inn site with residential on the remaining along Brook Avenue.		
Indicative Capacity	450		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	-	80	370
Address	Brook Avenue, Wembley, HA9		

Area	1.78ha
Description of Existing Site	Site is a residential street characterised by a mixture of two storey detached and semi-detached houses dating from the early 20 th century. The site is bounded by Brook Avenue to the north and the Wealdstone Brook to the south. The eastern parcel of land comprises a Premier Inn and associated car parking. To the north of Brook Avenue recent development has established a higher density which should be reflected in redevelopment of this site.
Ownership	Private
Planning History	No relevant planning history
PTAL Rating	4-5 (current) 5-6a (2031 estimate)
Planning Considerations	<ul style="list-style-type: none"> • Part of the site is within the Wembley Park town centre (Premier Inn). <u>The site is located within the Wembley Opportunity Area. It all sits within and</u> 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. • 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.

	<ul style="list-style-type: none"> • The site is adjacent to a wildlife corridor, where the London Plan Policy 7.19G6 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.
Risks	Site is in fragmented private ownership which is a barrier to comprehensive redevelopment.
Design Principles	<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 <u>positively contribute to the biodiversity</u>, 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.
Infrastructure Requirements	<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>
Justification	<ul style="list-style-type: none"> • The site is located in an area with Excellent public transport accessibility levels and • <u>Potential to could</u> 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. MM11

BCSA4: FIFTH WAY/EURO CAR PARTS

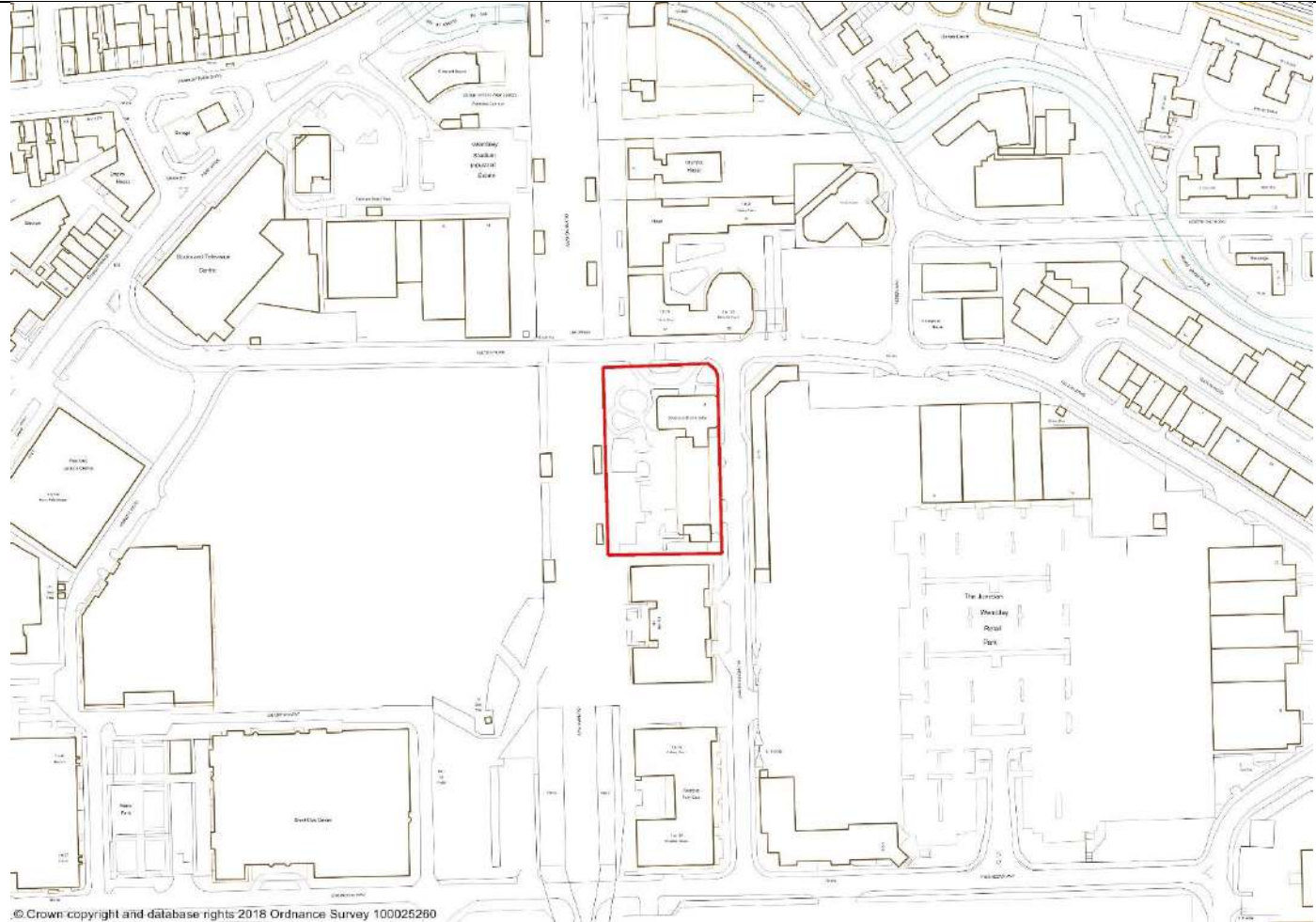
<p>Site Plan</p>	 <p>© Crown copyright and database rights 2020 Ordnance Survey 100025260</p> <p>Map Mod 7</p>
<p>Existing Use</p>	<p>Retail-Warehouse and car park of Euro Car Parts and adjacent vehicle/skip site for Generay</p>

Allocated Use	Mixed-use, residential-led development to to maximising re-provision of industrial floorspace incorporate maximum of business use floorspace, hotel and potentially student accommodation		
Indicative Capacity	Up to 700 dwellings (residential and student accommodation). Employment space and hotel space to be confirmed. <u>450 dwellings and industrial space to be confirmed</u>		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	200 <u>450</u>	500	-
Address	Fifth Way, Wembley		
Area	1.3ha <u>1.14 ha</u>		
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.		
Ownership	Private		
Planning History	No relevant planning history		
PTAL Rating	3 (current) <u>3-4</u> (2031 estimate)		
Planning Considerations	<ul style="list-style-type: none"> • The site is located within the Wembley Opportunity Area and Wembley Growth Area. • 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. As such, development at this site should be air quality positive as it is within the Growth Area. development at this site should achieve to reduce pollutant emissions and minimise exposure. • Given 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. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required and, if necessary, remediation. 		

	<ul style="list-style-type: none"> • 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 buffer zone along the brook will remove the developable area of the site of any major risks. • <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.
Risks	<p>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>
Design Principles	<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 <u>permitted</u> neighbouring heights permitted as part of the Quintain masterplan, tall buildings will be appropriate, stepping down towards the eastern edge of the site <u>and</u> 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 landscaping, tree planting and street furniture as agreed in consultation with the Environment Agency and Brent Council.
Infrastructure Requirements	<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.

	<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>^{MM12}
Justification	<ul style="list-style-type: none"> • This large site is underutilised and would be of much greater benefit as a mixed-use residential led development. • The forthcoming development immediately west of this site will comprise several tall residential towers and this site offers the opportunity to transition between the wider Wembley development and the industrial land to the east. • Development on this site can contribute to an improved setting for Wealdstone Brook including the delivery of open space and river restoration work to improve ecological diversity and climate change adaptation.

BCSA5: OLYMPIC OFFICE CENTRE

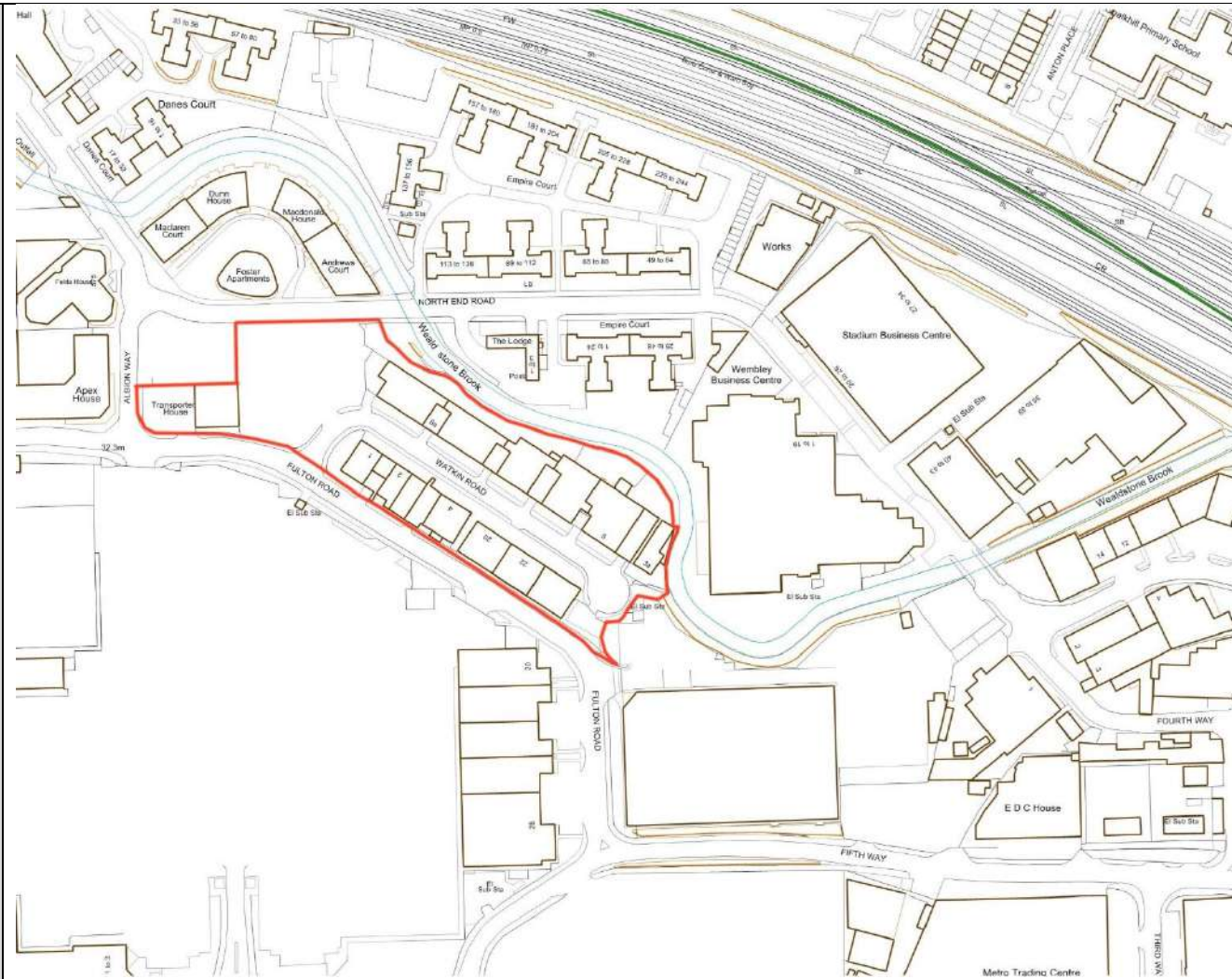
<p>Site Plan</p>	
<p>Existing Use</p>	<p>Offices of Network Homes</p>
<p>Allocated Use</p>	<p>Mixed use main town centre uses, education/campus or residential incorporating flexible retail uses, <u>leisure and community uses (A1, A2, A3, A4, D1, D2)</u>-at ground floor level</p>

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 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.		
Timeframe for Delivery	0-5 1-5 Years	5-10 6-10 Years	10+ 11+ Years
	-	-	-
Address	Olympic Office Centre, 8 Fulton Road, Wembley, HA9 0NU		
Area	0.44ha		
Description of Existing Site	The site is located between Olympic Way and Rutherford Way and is currently occupied by an eight storey office building along with associated car parking and soft landscaping.		
Ownership	Private		
Planning History	Permission granted (17/5097) Redevelopment of the Olympic Office Site and erection of a part-21 and part-15 storey building comprising 253 residential units and 1051sqm of flexible retail uses (A1, A2, A3, D1, D2).		
PTAL Rating	5 (current), 5-6a (2031 estimate) forecast		
Planning Considerations	<ul style="list-style-type: none"> • The site falls within Wembley town centre boundary, <u>the Wembley Opportunity Area</u> 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, <u>Its town centre location makes it suitable for office-led mixed-use development</u> 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. • <u>Excellent</u> Public Transport Accessibility Levels are very high for this site, and so parking spaces should be minimal so car free development should be prioritised. • 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	<ul style="list-style-type: none"> • Building height and massing should build upon the newly established rhythm along this part of Olympic Way and respond to surrounding development coming forward as part of the Wembley Park redevelopment. 		

	<ul style="list-style-type: none"> • The ground floor/podium use should come forward towards the edge of Olympic Way to provide additional continuation of the active frontage edge formed by the adjacent Unite and Novotel developments, as well as along Fulton Road and Rutherford Way. • The Low level podium and massing set out as such to protect the views of the stadium.
Infrastructure Requirements	<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> MM13
Justification	<p>The site is located in an area with excellent public transport accessibility levels and will replace a dated office building with a modern, high quality development that will allow for a more efficient use of land to enhance the viability and vitality of the town centre and Growth Area.</p>

BCSA6: WATKIN ROAD

Site Plan



Map Mod 8

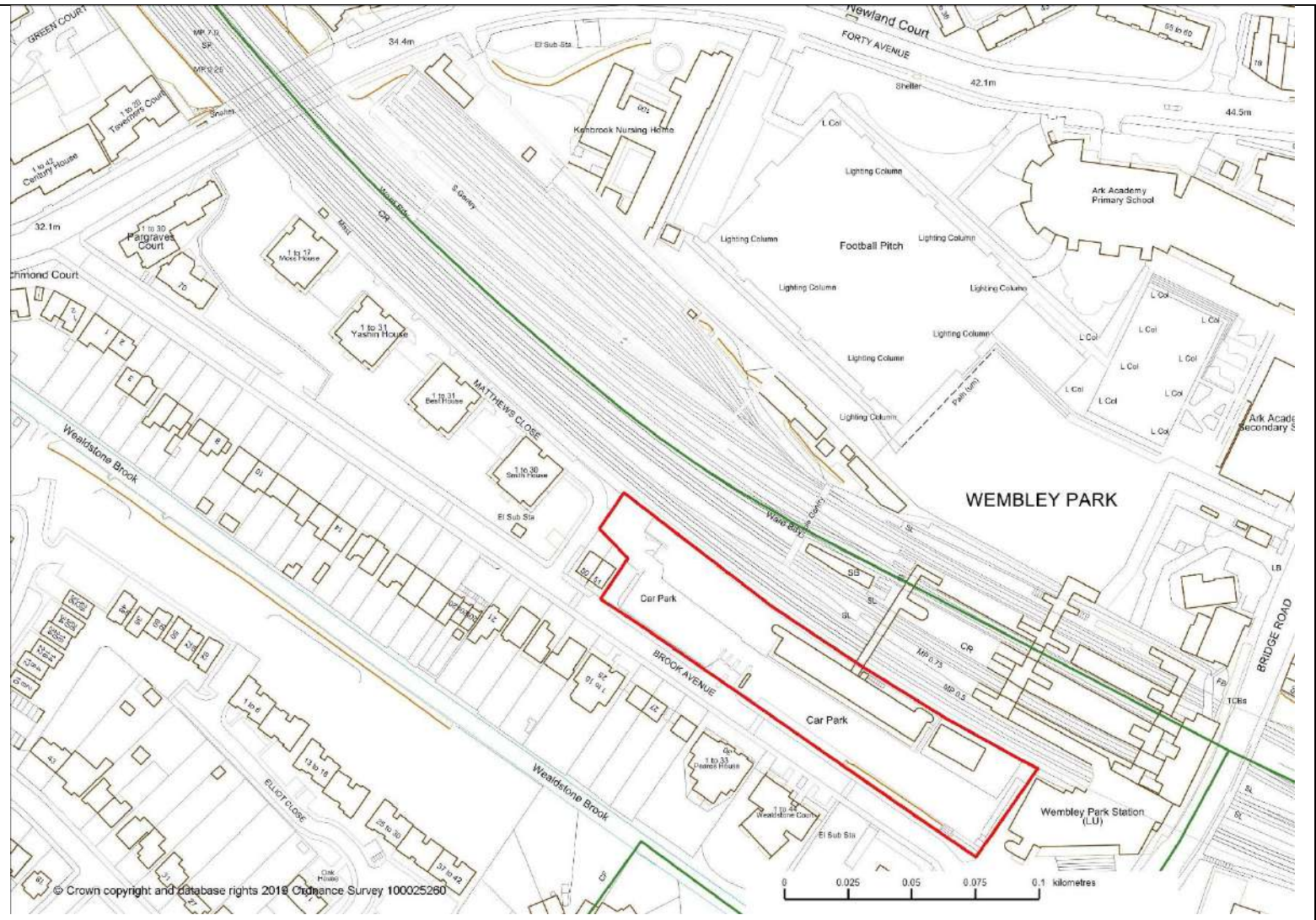
Existing Use	Industrial, storage and ancillary office use.		
Allocated Use	Mixed-use, residential-led development incorporating maximum re-provision of industrial space to the west of the site, adjacent to other schemes coming forward as part of the Wembley Park masterplan transitioning to a more commercial-led 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		
Timeframe for Delivery	0-5 1-5 Years	5-10 6-10 Years	10+ 11+ Years
	500 229	350	150 138
Address	Watkin Road, Wembley, HA9 0NL		
Area	1.41ha		
Description of Existing Site	The site is dominated by car repair garages, accompanied by a mix of industrial, storage and ancillary office buildings. The site contains no designated heritage assets.		
Ownership	Private		
Planning History	<p>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.</p> <p>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>		
PTAL Rating	4 (current and 2031 estimate) 2031 forecast – PTAL		
Planning Considerations	<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 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. 		

	<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. Given the identified industrial land need within the borough, means that employment the maximum viable replacement industrial floorspace at least on the ground floor of 0.65 plot ratio or existing floorspace whichever is the greater will now be sought in developments 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. • 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.
Risks	Site is in multiple ownership
Design Principles	<ul style="list-style-type: none"> • Tall buildings will be acceptable taking into account need to mediate between heights of the adjacent Wembley masterplan <u>development sites</u> 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.

	<ul style="list-style-type: none"> • 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.
Infrastructure Requirements	<ul style="list-style-type: none"> • Green and sustainable infrastructure should be part of the development process and the development. • 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>
Justification	<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. MM14

BCSA7: WEMBLEY PARK STATION (NORTH & SOUTH)

Site Plan



Map Mod 9

Existing Use

Car parking and office facilities for Wembley Park Station and disused railway sidings

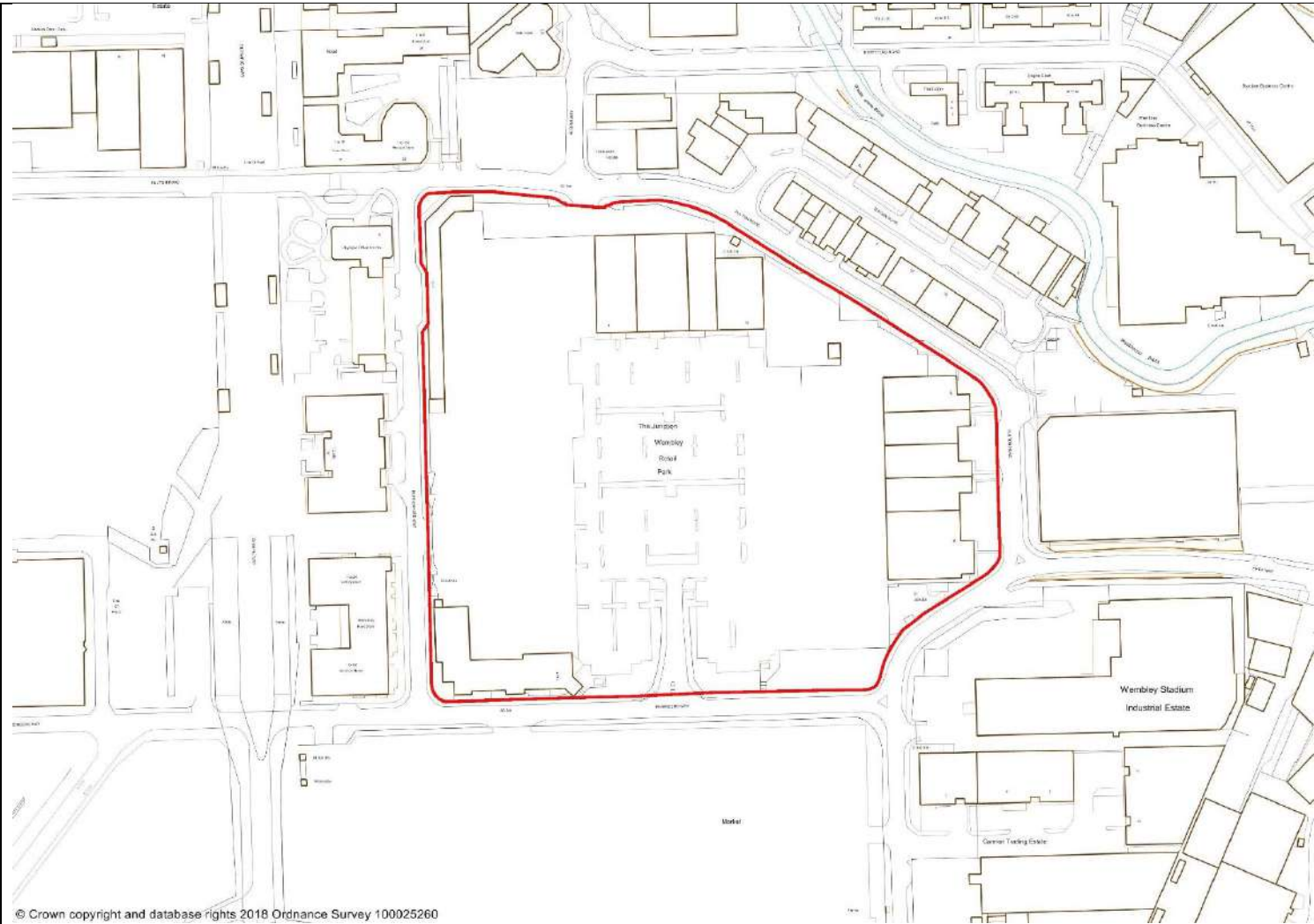
Allocated Use	Mixed-use residential-led development to include replacement of the existing office space <u>TfL ancillary accommodation</u>		
Indicative Capacity	456 <u>400</u> dwellings (300 southern site, 100 northern)		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	150	250 <u>456</u>	
Address	Wembley Park Station, Wembley, HA9 9AA		
Area	0.7 ha		
Description of Existing Site	<p>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>		
Ownership	Site wholly owned by TfL		
Planning History	No relevant planning history.		
PTAL Rating	5-6a (<u>current and 2031</u> estimate)		
Planning Considerations	<ul style="list-style-type: none"> • The site is adjacent to the boundary of Wembley Park Town Centre. <u>The site is located within the Wembley Opportunity Area and sits within the wider Wembley Growth Area</u>, 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, 		

	<p>improve access to nature and its recreational function that are important contributing factors to health and well-being of the community.</p> <ul style="list-style-type: none"> • 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 unacceptable impacts on the surrounding residential areas through displacement of user parking.
Risks	<p>Site is considered available and developable; no significant risks identified.</p>
Design Principles	<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 <u>development</u> 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.

<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"> • Consistent with London Plan Policy H1 the site is a 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. MM15

BCSA8: WEMBLEY RETAIL PARK

Site Plan



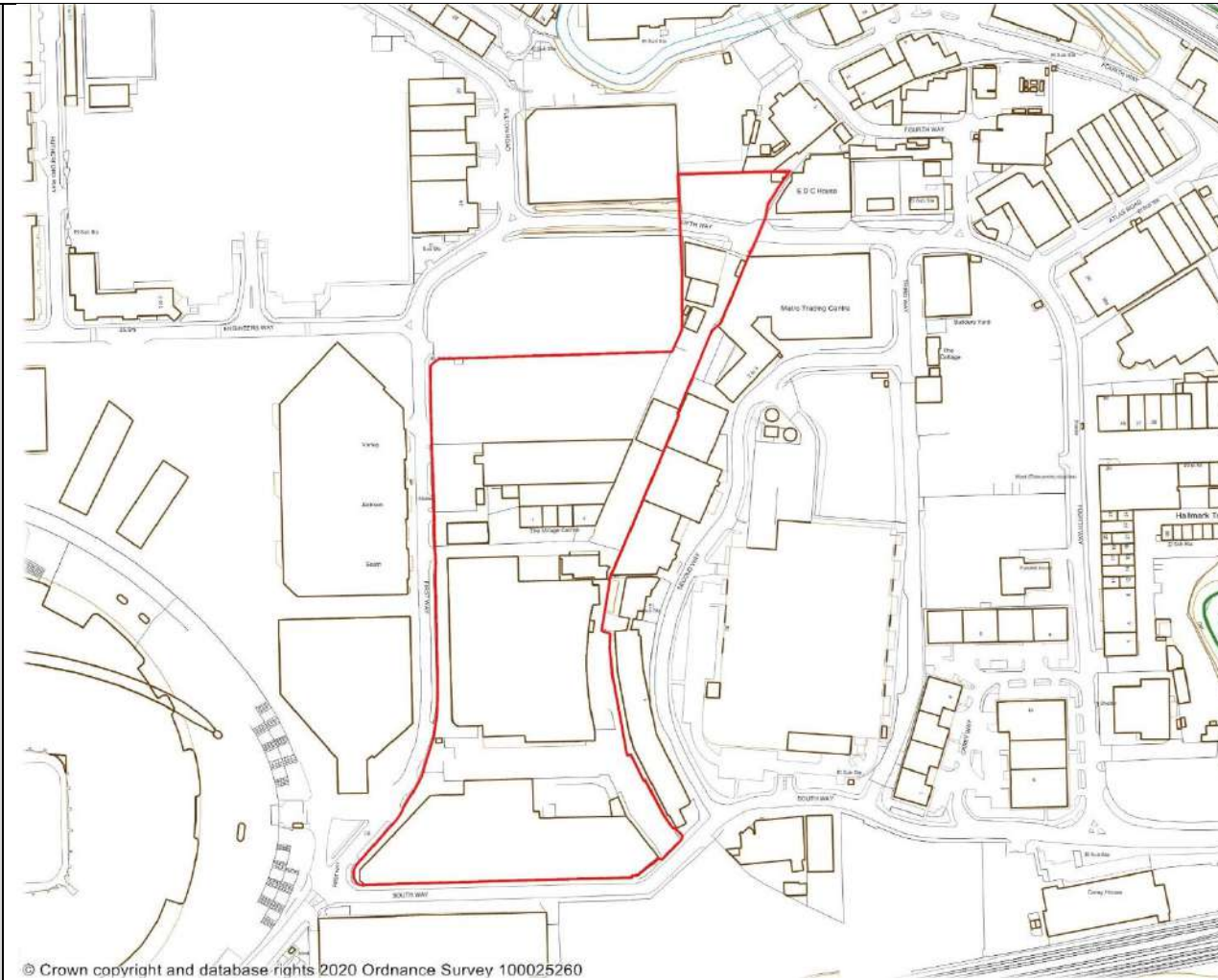
Existing Use	Car parking, industrial warehouse units and meanwhile uses including office facilities and playing pitches
Allocated Use	Mixed-use residential-led development

Indicative Capacity	2180 2260		
Timeframe for Delivery	0-5 1-5 Years	5-10 6-10 Years	10+ 11+ Years
NE01/02, NE03, NE04/05/06	468	1712 2260	
Address	Wembley Retail Park, Wembley, HA0		
Area	5ha		
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.		
Ownership	Private		
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.		
PTAL Rating	3-5 (current and 2031 estimate)		
Planning Considerations	<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 <u>Wembley Opportunity Area and wider Wembley Growth Area</u>, making it suitable for residential <u>led mixed-use</u> 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 <u>provide capacity borough</u>, 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 <u>it is</u> suitable for tall buildings in the <u>Wembley Area Action Plan</u> 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. 		

	<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.
Risks	No significant risks identified.
Design Principles	<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>
Infrastructure Requirements	<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>
Justification	<ul style="list-style-type: none"> The site offers substantial development potential as an integral part of the wider Wembley development area. This plot forms one of the principal development areas of the forthcoming scheme and will provide a significant amount of green space to support the surrounding development. The site's high PTAL and proximity to both Wembley and Wembley Park town centres make it suitable for dense residential development along with associated social and physical infrastructure as necessary. MM16

BCSA9: FIRST WAY

Site Plan



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Map Mod 10

Existing Use

Industrial

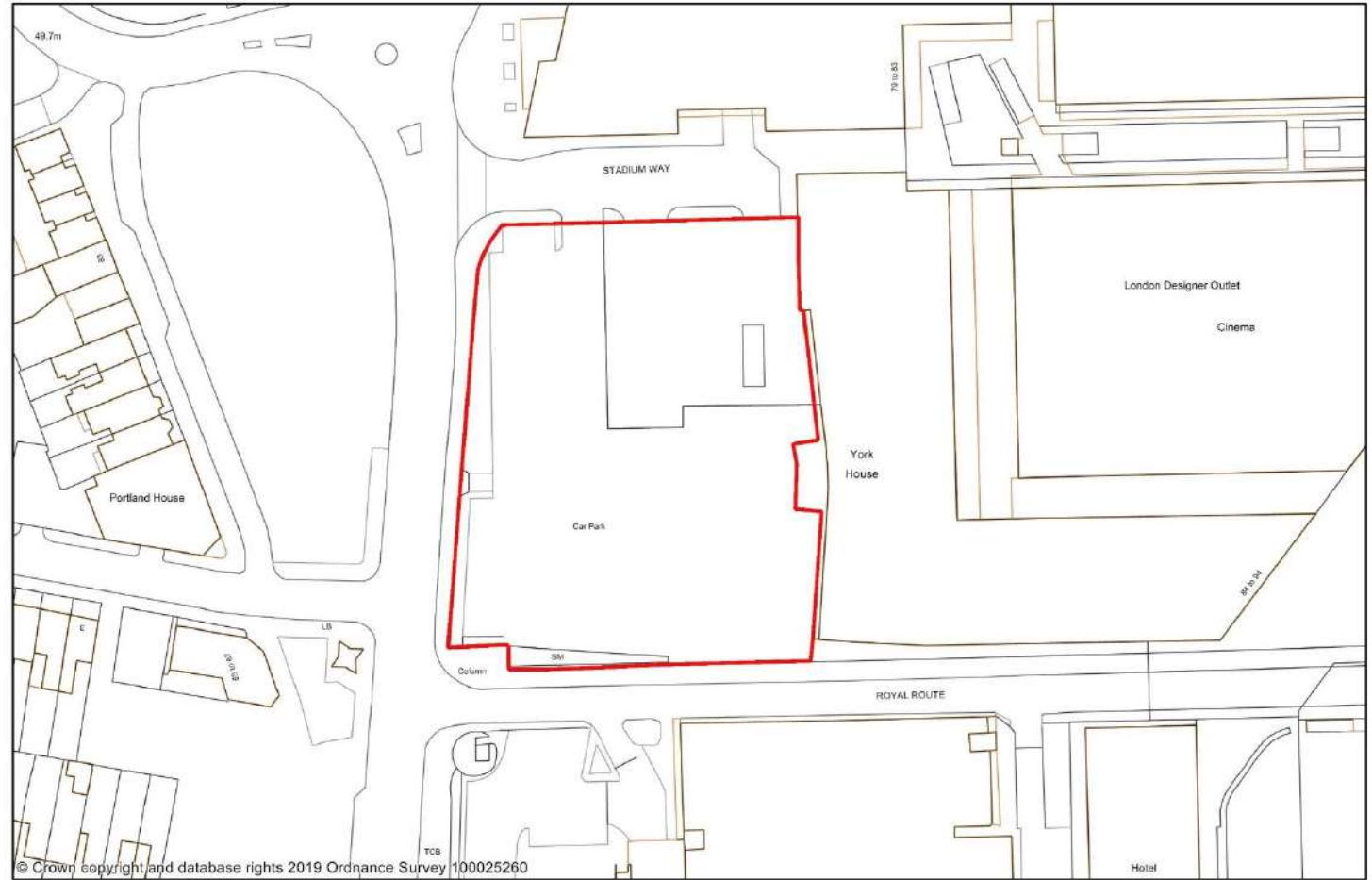
Allocated Use	Residential-led mixed-use development, including student accommodation/ education and business industrial.		
Indicative Capacity	1312 1200 dwellings		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	<u>419</u>	<u>500</u>	<u>393</u>
Address	First Way, Wembley, HA0		
Area	4.42ha- <u>4.58ha</u>		
Description of Existing Site	<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. 		
Ownership	Private		
Planning History	Approved planning application 17/3797 for the demolition of the existing buildings and erection of a part 7/9/10/11 storeys building, comprising educational use (Use Class D1), office use (Use Class B1(a) and student accommodation (Use Class Sui Generis), with ancillary external landscaping.		
PTAL Rating	1a-3 (<u>current and 2031 estimate</u>)		
Planning Considerations	<ul style="list-style-type: none"> The site falls outside Wembley Town Centre boundary however it does Sits within <u>the Wembley Opportunity Area and the wider Wembley Growth Area</u>, making it suitable for residential <u>led mixed-use</u> development. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets. 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 it should come forward at lower heights than those buildings further west towards the stadium.</u> 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. 		

	<ul style="list-style-type: none"> • 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, Given the identified need within the borough, Brent's status as a 'provide capacity' borough in the London Plan means that the maximum re-provision of business industrial 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 phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
Risks	Land is in multiple ownership which may prevent comprehensive redevelopment. Piecemeal development may prevent the most efficient land use.
Design Principles	<ul style="list-style-type: none"> • Development on this site should provide master planning showing a 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 <u>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.</u> • 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.

	<ul style="list-style-type: none"> • Development should provide active frontages along First Way and South Way and the planned pedestrian routes north and south of Dhamecha. • The proximity to the national stadium and coach/car parking means acceptable noise mitigation measures will be required to address event day activity.
Infrastructure Requirements	<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 <u>will</u> 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>
Justification	<ul style="list-style-type: none"> • The site is located at the edge of the current approved masterplan for the land around <u>wider Wembley development adjacent to the Stadium</u> 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. • 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. MM17

BCSA10: YORK HOUSE

Site Plan



Existing Use

Commercial office space and associated Car parking

Allocated Use	Nursery and 3FE primary school		
Indicative Capacity	-		
Timeframe for Delivery	0-5 1-5 Years	5-10 6-10 Years	10+ 11+ Years
	-	-	-
Address	York House, Empire Way, Wembley, HA9 0PA		
Area	0.79ha		
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.		
Ownership	Private		
Planning History	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.		
PTAL Rating	5-6a (current and 2031 estimate)		
Planning Considerations	<ul style="list-style-type: none"> • The site falls outside <u>sits inside</u> Wembley Town Centre boundary, however it sits within the Wembley Growth Area and Wembley Regeneration. <u>Wembley Opportunity Area</u> • 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 <u>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.</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. • 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. 		
Risks	School funding delayed.		
Design Principles	<ul style="list-style-type: none"> • In line with planning application 18/2197 the school should be organised around an internal atrium space and an enclosed courtyard to maintain privacy for the pupils. 		

	<ul style="list-style-type: none"> • The entrance to the school will be from the Royal Route. • The school should be designed to provide a strong built form along Wembley Hill Road and locate its play ground to the rear away from the principal traffic route.
Infrastructure Requirements	<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> MM18
Justification	<ul style="list-style-type: none"> • The site contains a large car park which is surplus to requirements. • The site falls within Wembley Growth Area and Wembley Town Centre and benefits from good access to local services. • Population growth in the borough requires the provision of extra primary school facilities and this site is well suited to being allocated for this use.

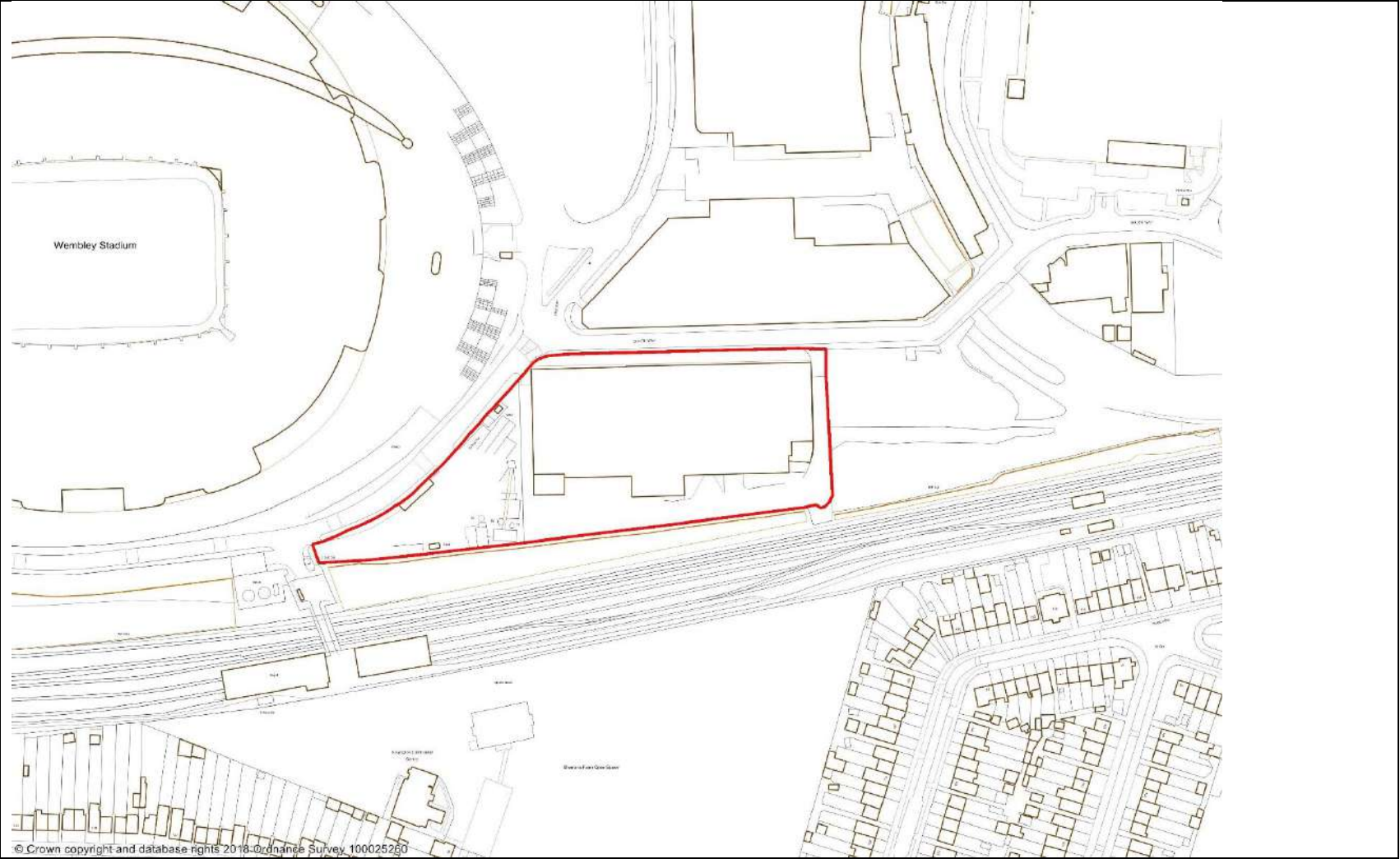
BCSA11: COLLEGE OF NORTH WEST LONDON WEMBLEY

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Educational facility for the College of North West London</p>		
<p>Allocated Use</p>	<p>Mixed-use residential-led development</p>		
<p>Indicative Capacity</p>	<p>155</p>		
<p>Timeframe for Delivery</p>	<p>0-5 <u>1-5</u> Years</p>	<p>5-10 <u>6-10</u> Years</p>	<p>10+ <u>11+</u> Years</p>
	<p>-</p>	<p>155</p>	<p>-</p>

Address	Wembley Park Drive, Wembley, HA9 8HQ
Area	0.24ha
Description of Existing Site	Site is currently home to the College of North West London Wembley campus. The site is bounded by Wealdstone Brook to the north and Olympic Way to the east. To the west the site fronts onto Wembley Park Drive. To the south are large retail units and associated car parking which is subject to a separate allocation in this Plan.
Ownership	Private
Planning History	No relevant planning history
PTAL Rating	6a (<u>current and 2031 estimate</u>)
Planning Considerations	<ul style="list-style-type: none"> • The site falls outside <u>inside</u> Wembley <u>Park</u> Town Centre boundary, however it sits within the Wembley Growth Area and Wembley Regeneration- Wembley Opportunity Area • <u>Most of</u> 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. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • 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 <u>site</u> 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>
Risks	Need to find alternative location for the college
Design Principles	<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 <u>development regeneration scheme</u>, 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.

	<ul style="list-style-type: none"> • 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.
Infrastructure Requirements	<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> MM19
Justification	<ul style="list-style-type: none"> • The site is located in an area with excellent public transport accessibility levels. • The site is likely to be surplus to the college's requirements as part of a process of consolidation of better facilities on another site within Wembley Park. • The site's location on Olympic Way provides an opportunity to create a high quality development to act as a gateway from Wembley Park Station to the stadium.

BCSA12: LAND TO SOUTH OF SOUTH WAY

<p>Site Plan</p>	
<p>Existing Use</p>	<p>Industrial/D2 night club /Concrete batching plant</p>
<p>Allocated Use</p>	<p>Residential-led mixed-use development including business industrial premises.</p>

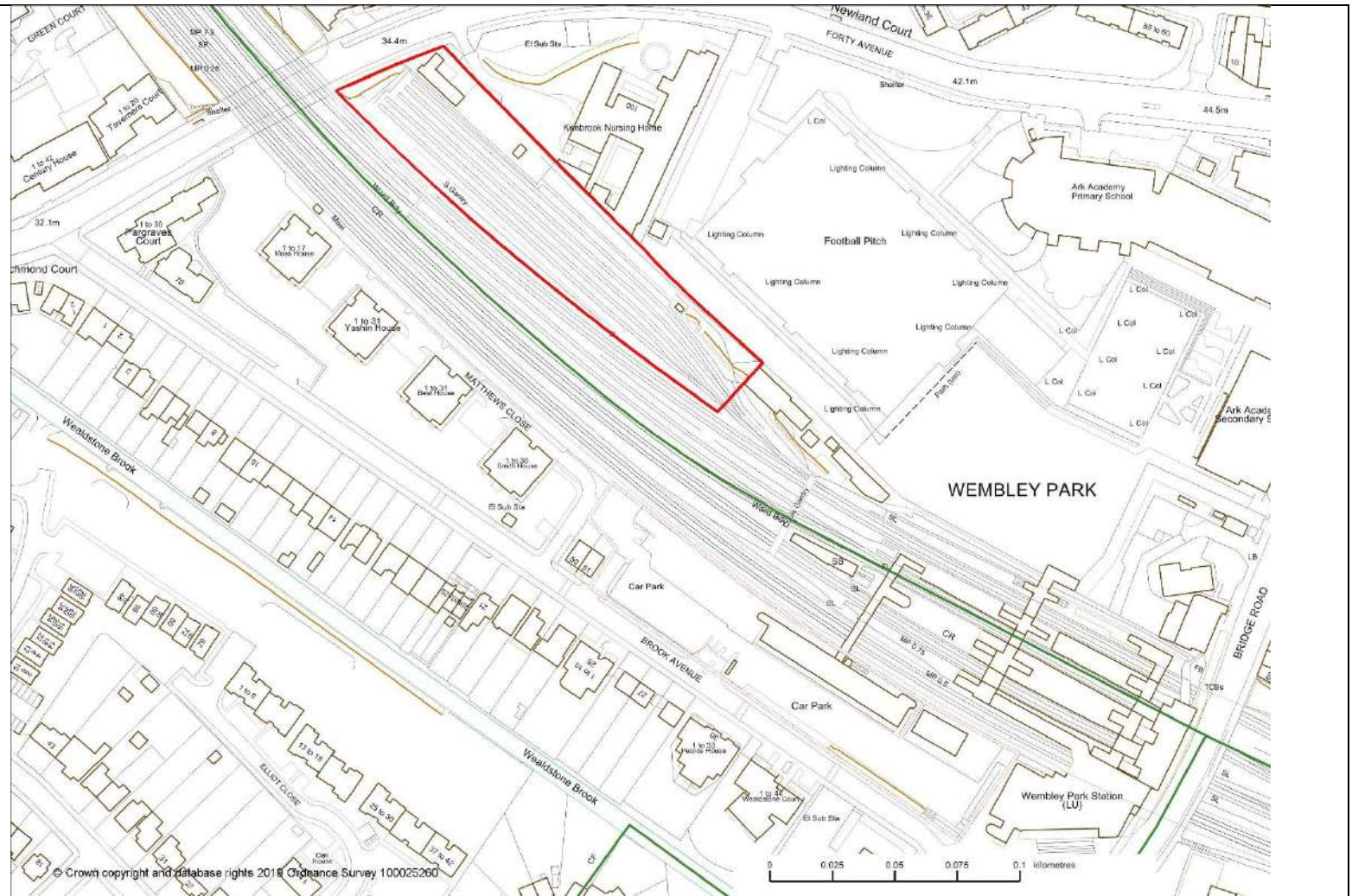
Indicative Capacity	500 dwellings		
Timeframe for Delivery	0-5 1-5 Years	5-10 6-10 Years	10+ 11+ Years
	-	-	500
Address	South Way, Wembley, HA0		
Area	1.7 hectares		
Description of Existing Site	<p>The site currently comprises a mixture low-rise industrial units (one in use as a night club) and a concrete 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>		
Ownership	Private		
Planning History	None		
PTAL Rating	2 (<u>current and 2031 estimate</u>)		
Planning Considerations	<ul style="list-style-type: none"> • The site falls outside Wembley Town Centre boundary however it does sit within the wider Wembley Growth Area <u>and the Wembley Opportunity Area</u>, making it suitable for residential <u>led mixed-use</u> development. • The SINCGrade I Chiltern line passes south of the site. The site is also adjacent to a wildlife corridor, where the London Plan Policy G6 <u>Biodiversity and access to nature</u> is applicable. <u>As such</u>, 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. • <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. 		

	<ul style="list-style-type: none"> • Prior to its Wembley Area Action Plan allocation, The site was formerly Strategic Industrial Land. It still <u>and</u> contains numerous occupied <u>business industrial</u> 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 <u>maximum viable amount of industrial floorspace will be required.</u> 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. • 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.
Risks	<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.
Design Principles	<ul style="list-style-type: none"> • <u>The site falls within the Tall Building Zone however</u> 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.

	<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 <u>industrial</u> 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 <u>adjacent</u> 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>
Infrastructure Requirements	<ul style="list-style-type: none"> • Small parcels of land at the <u>on northern parts and south</u> 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>
Justification	<ul style="list-style-type: none"> • The site is located at the edge of the <u>Wembley area development</u> 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 <u>quality employment</u> <u>industrial</u> 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. MM20

BCSA20: WEMBLEY PARK STATION (NORTH)

Site Plan



Map Mod 12

<u>Existing Use</u>	<u>Disused railway sidings</u>		
<u>Allocated Use</u>	<u>Mixed-use residential-led development</u>		
<u>Indicative Capacity</u>	<u>100</u>		
<u>Timeframe for Delivery</u>	<u>1-5 Years</u>	<u>6-10 Years</u>	<u>11+ Years</u>
	<u>=</u>	<u>=</u>	<u>100</u>
<u>Address</u>	<u>Wembley Park Station, Wembley, HA9 9AA</u>		
<u>Area</u>	<u>0.72 ha</u>		
<u>Description of Existing Site</u>	<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>		
<u>Ownership</u>	<u>Site owned by TfL</u>		
<u>Planning History</u>	<u>No relevant planning history.</u>		
<u>PTAL Rating</u>	<u>4 (current and 2031 estimate)</u>		
<u>Planning Considerations</u>	<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> 		
<u>Risks</u>	<u>no significant risks identified</u>		
<u>Design Principles</u>	<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> 		

	<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>
<u>Infrastructure Requirements</u>	<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>
<u>Justification</u>	<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.</u></p> <p><u>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.</u></p> <p><u>The site has good access to public transport and local infrastructure including shops and green spaces.</u> MM20</p>

FIGURE 10 OTHER SITE ALLOCATIONS

Ref.	Address	Size (ha)	Existing Use	Allocated Use	Indicative homes	Comments
BCSA13	Former Malcolm House Site,	0.2	Temporary construction storage site	Mixed Use with <u>maximum viable a minimum of 0.65 plot ratio</u> B1 business use, <u>light industrial/ research & development floorspace</u> with the remainder being of main town centre uses or residential MM21	100	Ground floor active frontages required on streets, potential for some land required for junction improvements.
BCSA14	St Joseph's Social Club, Empire Way	0.38	Vacant	Residential/community use	60	Re-provision of D1 MM21 community use, plus additional residential uses. Active frontage at ground floor.
BCSA15	Site W10 Wembley Masterplan <u>Land west of multi storey car park on South Way west of the National Stadium</u>	0.5	Car park	Retail or entertainment and leisure at ground, upper floors B1 office or D2 entertainment and leisure MM21	0	Development parameters to be consistent with planning permission 15/5550
BCSA16	Site NW04 Wembley Masterplan <u>Land north of Engineers Way, between Brent Civic Centre and Olympic Way</u>	0.35	Meanwhile use of public realm	A1-A5, D1 ground, D1, B1/C1/D2 uppers <u>Retail/food & drink/ medical or health services/ crèche, nursery or day centre/ Hotels and</u>	0	Outline consent for A1-A5 and B1/C1/D1 uses and development parameters granted through 18/0968. <u>Development must be consistent with the</u>

Ref.	Address	Size (ha)	Existing Use	Allocated Use	Indicative homes	Comments
				<u>hostels/ Learning and non-residential institutions/local community</u>		<u>recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> MM21
BCSA17	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. MM21
BCSA18	Site W12 Wembley Park Boulevard, Wembley <u>Land between Ibis and Premier Inn, South Way</u>	0.015	The Red House	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> MM21	0	Outline planning permission for the demolition of existing building and erection of a 4-storey building and new pedestrian boulevard with associated service yard, landscaping and infrastructure works.
BCSA19	Wembley Park Station, Police Station and Adjacent Land Bridge Road	0.34 MM21	Police station and Underground Station ancillary	Residential, plus re-provision of police station.	60	Provision of an active frontage at ground floor along Bridge Road is required

FIGURE 11 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

Ref.	Address	Size (ha)	Existing Use	Permission Uses	Indicative homes	Comments
14/4931 & 18/0742	South West Lands SW01/02/07 South Way	0.25	NA	Residential	127-156	Site ready On site. Completion due 2022/23 MiM23
14/4931	South West Lands SW03/04/05 South Way		NA	Residential	739	On site MiM24
14/4931	South West Lands SW06/07 South Way	0.1	NA	Residential	29	Site ready MiM25
15/4714	Mahatma Gandhi House, South Way		NA	Residential/Commercial	198	On site MiM26
03/3200	Wembley masterplan W03		NA	Residential/Commercial	340	On site Completion Autumn 2019 MiM27
15/5550	Wembley masterplan W06		NA	Residential/Commercial	150	On site MiM28
15/5550	Wembley masterplan W08	0.5	Meanwhile play space	A1 retail ground, B1 office Upper floors	0	
15/5550	Wembley masterplan NW09/10	0.4	Construction Storage	Residential/Commercial	396	On-site. Completion due 2022/2023 MiM29
15/5550	Wembley masterplan NW11	0.5	Meanwhile Boxpark	Residential/Commercial	125	Meanwhile use completed. Completion due 2030/31 MiM30
17/4538 & 19/0395	1 Olympic Way		Office	Residential/Commercial	298	Mixture of prior approvals and extensions proposed. Started on site MiM31
17/3789	3 Olympic Way		Office	Residential	60	Prior approval

Ref.	Address	Size (ha)	Existing Use	Permission Uses	Indicative homes	Comments
15/5550	Wembley masterplan E01/02		NA	Residential	633	On site and party completed MiM32
15/5550	Wembley masterplan E03		NA	Residential	743	On site close to completion completion Autumn 2020 MiM33
17/3213	Wembley masterplan E05	1.1		Residential, Commercial and community, B1 Office, Coach Parking	458	On site - Completion due 2021/22 MiM34
16/1404	Amex House North End Road		NA	Residential	195	Autumn 2020 Completion MiM35
12/1293	Kelaty House First Way		Vacant Employment	Student Accommodation	240	Started on site. MiM36 Student rooms to dwellings conversion factor 2.5:1 used.
17/4679	6-10 Hallmark Trading Centre, Fourth Way HA9 0LB		Employment	Residential	10	Prior Approval - Started on site MiM37
16/3408	Blocks A & B Raglan Court, Empire Way – Additional 2 storeys		Residential	Residential	72	Not started

5 Places

5.2 East

5.2.1 MiM³⁸ This place includes the wards of Dollis Hill, Dudden Hill, Fryent and Welsh Harp. To the east it is bounded by the A5 Edgware Road which follows the route of the old Roman road, Watling Street into central London. To the north it is bounded by Kingsbury Road, to the west by Slough Lane/ Salmon Street/ Blackbird Hill and River Brent, to the south by Chiltern, Metropolitan/Jubilee and Dudding Hill rail lines.

Figure 12 Map of East Place

Character & Culture

- 5.2.2 East comprises largely residential neighbourhoods with limited focal points, the town centre being Neasden to the south, whilst for other parts it is local centres/parades along main movement corridors. It has one significant industrial area at the London scale at Staples Corner and at the Brent scale along Kingsbury Road. It has three conservation areas; St Andrew's, Homestead Park and Neasden Village.
- 5.2.3 The character is predominantly interwar suburban of low rise terraced, semi-detached and detached homes. Exceptions to this are Neasden which also includes some Victorian and Edwardian terraces and other areas of more recent infill on surplus public land or former employment premises.
- 5.2.4 Significant open spaces include the expansive Welsh Harp reservoir/ Neasden sports and recreation ground, the northern part of Gladstone Park, Silver Jubilee Park and Kingsbury recreation ground. The River Brent and Canal Feeder run south through Neasden, along narrow corridors which largely to the rear of properties, are publically inaccessible and heavily engineered. Along the northern edge of Welsh Harp, part of Wood Lane retains a rural character.
- 5.2.5 There are some notable cultural and heritage assets including the Shree Swaminarayan Mandir temple, English Martyrs RC Church, St Andrew's Church which is Grade I listed along with several other listed monuments in its church yard and dwellings in the adjacent area. Welsh Harp is home to a large sailing club and Silver Jubilee Park to Edgware Town and Kingsbury Town football club grounds.

Transport

5.2.6 Overall, the public transport offer overall is relatively weak, with only one rail station at Neasden providing access to the Jubilee Line. In addition, Dollis Hill underground improves public transport accessibility to the south east part of the East Place. There are bus services that focus on the principal movement corridors of the A5 Edgware Road, A4140 Salmon Street, A4088 Blackbird Hill/Neasden Lane, A406 North Circular, A4006 Kingsbury Road and B454 Church Lane. The limited access to public transport over much of the area promotes a higher reliance on the private car for movement. Part of the London Cycle Network runs through Neasden to the A5 Edgware Road through quiet roads south of the North Circular. Walking routes are predominantly street based, with some recreational ones in parks and open spaces such as Welsh Harp.

Town Centres

5.2.7 This place only has one town centre at Neasden. This is a centre that is struggling in terms of its vitality and viability. In terms of draw/offer it is essentially operating as a neighbourhood centre for convenience shopping. There are a number local parades along main movement corridors such as Edgware Road, Church Lane and Blackbird Hill/ Neasden Lane. These all comprise predominantly small scale independent traders of local convenience shops and services reflecting Brent's diverse communities, with restaurants and takeaways serving food from all around the world.

Employment & Education

5.2.8 Staples Corner is a designated Strategic Industrial Location, meaning it has importance at a London level. Its location near to the A5, A406 and M1 provides potential for good HGV access. It has a range of employment spaces of different sizes but also a high number of trade counter type businesses. Smaller Locally Significant Industrial sites are located along Kingsbury Road, Edgware Road^{MiM39} and near Neasden station. The area includes the College of North West London Neasden Campus and has a good coverage of primary and secondary schools.

<u>Challenges</u>	<u>Opportunities</u>
<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> 	<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</u>

<u>Challenges</u>	<u>Opportunities</u>
<ul style="list-style-type: none"> • <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>infrastructure providing a high quality of life which is attractive to families.</u></p> <ul style="list-style-type: none"> • <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>^{MM23}

Figure 13 High Level Plan of the Place. More detailed boundaries can be seen on the Policies Map^{MiM40}

Vision

5.2.9 Neasden centre's role of local importance will be maintained, providing a range of retailing including many independent shops, a new street market and a mix of community and cultural facilities meeting needs reflecting its diverse population and some new homes. The local population to support it will be added to by the Neasden Stations Growth Area; a key focus for new housing and employment provided in tall buildings and a new West London Orbital railway station. Improvements to the public realm and townscape, particularly along and around the North Circular and Neasden junction will be sought.

5.2.10 Staples Corner will be transformed into a new mixed use community, linking to the Thameslink Brent Cross West station and Brent Cross Opportunity Area in the London Borough of Barnet. It will also be a focus for tall buildings. Employment Industrial^{MiM41} space that meets 21st century needs will be prioritised in association with new homes and social infrastructure. Marking the area's role as a gateway to Brent, there will be significant improvements to townscape on the A5 Edgware Road and A406 North Circular Road, with the Welsh Harp's setting, access and function significantly improved to better reflect its role as an environmental asset and 'green lung' for London.

5.2.11 Elsewhere existing low density development and limited potential for improvements to public transport accessibility will mean extensive change is unlikely. Opportunities for new development will however exist, e.g. town centres and intensification corridors along main public transport corridors, ~~whilst with~~ the height of buildings related to these opportunities ~~will being~~ typically be up to 5 ~~to 6~~ storeys. ~~a~~Active ground floor frontages will wherever possible be maintained or improved.^{MiM42}

POLICY BP2 EAST

Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:

Character, Heritage and Design

Strengthen local identity and character by:

- a) **Conserving and enhancing heritage assets, including Church Lane and Neasden Conservation Areas.**
- b) **Respecting the predominantly suburban low rise character of the area. Tall buildings of over 30 metres (10 storeys) are identified for the Staples Corner and Neasden Stations' Growth Areas, and will step down to form a comfortable relationship with adjacent areas.**
- 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.**
- d) **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.**

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**
- f) **Potential at various locations in Neasden town centre to support its vitality and viability**
- g) **Intensification corridors – as yet numbers of homes are unknown. It is dependent on whether conversion/ extensions or redevelopment of existing buildings**

Town Centres

- h) Neasden town centre will provide convenience retail for local communities in addition to a street market, restaurant and café offer. Additional small scale retail/ other uses floorspace will be supported to consolidate this role. Improvements to the public realm and connectivity will be sought.
- i) Retail parades along Neasden Lane/ Blackbird Hill and Church Lane will be supported with flexibility on uses to maintain commercial premises at ground floor, particularly for meanwhile uses or low cost workspaces. Rationalisation on the edges will however be supported if significant long term vacancies indicate a need to reduce commercial capacity.
- 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.
- 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.
- l) Securing the retention of the area's religious buildings

Employment and Skills

Supporting the local economy by:

- m) Retaining and encouraging intensification of employment light industrial, general industrial and storage and distribution uses at Kingsbury Locally Significant Industrial Site.
- n) Supporting transformational change of Staples Corner and Neasden Stations 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.
- o) Retaining/ seeking re-provision of a variety of small scale employment in association with new development and generally throughout the East Place.^{MM24}
- 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.

Open Space and Biodiversity

- q) Contribute to high quality, well-used open spaces and wildlife corridors to include:

- i. **Enhancement of Welsh Harp's and River Brent's recreational and ecological offer**
- ii. **Maintaining and enhancing Kingsbury Recreation Ground, Silver Jubilee Park and Gladstone Park**
- iii. **Tree planting and associated landscaping around North Circular Road/ A5 and other transport corridors.**

Transport

- r) **Safeguard land for the West London Orbital route and associated infrastructure.**
- s) **Reduce traffic dominance and enhancing the A5 corridor and North Circular Road and public transport corridors through public realm improvements to healthy streets standards.**
- t) **Direct development to and increase patronage/ services on public transport corridors.**

Justification

Character, Heritage and Design

5.2.12 Although of slightly denser character in the south towards Neasden where there is a higher concentration of terrace properties, the area as a whole is typically low rise, low density suburban in character. It is three or four storey properties in a few places along transport corridors/ in Neasden Town Centre, but elsewhere almost all uniformly two storey. The area has not been identified for substantial change in recent Local Plans, containing no Growth Areas. Where development has occurred, it has typically been infill, low rise and low density.

5.2.13 The limited extent of heritage assets focused in Neasden and Church Lane Conservation Areas might be seen as providing opportunity for extensive change. Nevertheless, the relative uniformity of the character, particularly in terms of height limits radical change, as does a range of other factors, most notably limited public transport accessibility.

5.2.14 Tall buildings will not be in character with much of this place. As such opportunities for buildings over 10 storeys are in the Growth Areas which it is proposed will undergo radical change, related to major improvements in public transport accessibility where there is also the need to secure a wide range of benefits and be consistent with the London Plan's priority of development near public transport.

5.2.15 Elsewhere opportunities for taller buildings (up to 5 storeys) are considered likely to be appropriate along intensification corridors and Neasden town centre (~~up to 6 storeys~~)^{MiM43} where the larger scale buildings in the area already exist.

Homes

5.2.16 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 industrial~~ and residential floorspace. A masterplanning exercise will be undertaken involving key stakeholders, landowners and developers to help shape the masterplan from conception to completion. This will to identify the 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.

5.2.17 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.

5.2.18 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 prejudice the delivery of a comprehensive masterplan ~~undermine the outcomes of any likely adopted masterplan.~~ MM25

5.2.19 Elsewhere the opportunity to provide homes is likely to be in Neasden town centre and along intensification corridors, either through redevelopment, or as small scale infill/ redevelopment/ extensions and conversions. Delivery of additional homes is considered more uncertain in these areas, due to competing demands on existing buildings in many cases, e.g. existence of extended family housing, together elsewhere with occupation/ ownership by multiple people/ organisations.

Town Centres

5.2.20 The principal centre in this area is Neasden, which essentially provides a neighbourhood level of service/ attractiveness. It is a council priority centre with an associated action plan being developed. Competition from the internet and competing centres will provide challenges in maintaining its current relevance for the locality as a destination for retail or other activities. There is very limited need for additional retail and leisure/ drinking in the area in the future. As such flexibility will be the key to ensure limited vacancy at ground floor level through, for example, reuse of retail premises for workspace and promotion of development opportunities where they exist. This could be through potentially turning peripheral ground floor commercial uses to residential/ promoting redevelopment of buildings/ inefficient spaces to provide more living accommodation.

5.2.21 Elsewhere the role of the extensive retail parades along Neasden Lane, Church Street and A5 Edgware Road in providing for local convenience and service needs will be supported. These centres are also likely to find trading conditions challenging and as such flexibility of premises will be favoured to maintain commercial ground floor uses, until such a time as this can be shown to be unviable, when consideration will be given to potentially contracting their length to smaller cores.

Community & Cultural Facilities

5.2.22 The need for new community facilities is likely to primarily be within and around the new Growth Areas. This will be resolved through the masterplanning exercise. It is recognised that there are continued unmet demands for religious buildings and youth facilities which these areas may accommodate.

Employment & Skills

- 5.2.23 The principal areas of industrial employment are currently the designated areas at Staples Corner, Kingsbury and Neasden. As identified Staples Corner and Neasden will be taken forward as Growth Areas. This will not be at the expense of employment industrial space, which needs to be added to. Much of these areas have suffered from very low levels of investment in premises over the years. As such many buildings' usefulness/ levels of employment provision are low. Where investment has been made, much has been in quasi retail/ trade counters.
- 5.2.24 Consistent with London Plan policy, the council is seeking to ensure intensification of employment industrial use in modern fit for purpose premises. Providing the incentive to develop these however is considered more likely to happen with cross-subsidy from other more lucrative uses. The council recognises that to date the mixing of larger scale employment industrial uses with residential development in particular has been limited and needs careful management to be successful, creating good environments for communities and businesses.
- 5.2.25 The Kingsbury employment industrial area retains principally clearly defined boundaries, with very little encroachment from non-employment uses. Exceptions have been the permitted development of office to residential which the council has now ceased through an Article 4 direction. The council will support the area's continued employment industrial use through encouraging investment only in employment industrial ^{MiM44} uses.
- 5.2.26 The proposed redevelopment of the College of North West London site will allow the college to amalgamate sites elsewhere in the borough and invest in its future. The college is particularly important in allowing Brent residents to attain skills and training that will enable them to participate in the jobs market. As such, subject to being compliant with other development plan policies, development that maximises the potential to support this and wider local plan objectives on its existing site will be supported.

Open Space and Biodiversity

- 5.2.27 Whilst the north of this place is well served by open spaces, there are areas of deficiency to the south. There are limited opportunities to secure additional open spaces through redevelopment. On the large scale sites, whilst some space will be provided, the existing built up nature, combined with the need to generate sufficient values to ensure viability will be a challenge. It will therefore be important to ensure the quality of existing open spaces are enhanced, even where scoring highly such as at Welsh Harp, Silver Jubilee Park, Kingsbury Recreation Ground and River Brent corridor. The Welsh Harp has the potential to offer so much more in terms of accessibility for recreation and leisure use and ecology. Its proximity to development areas increases the potential to improve its setting and also provide developer funding for its improvement.

Transport

- 5.2.28 The West London Orbital, which will make use of the existing Dudding Hill freight line is a key opportunity to improve passenger orbital links and connect the area to High Speed 2 and Elizabeth Line and Old Oak and to the east Thameslink at Brent Cross West. This will significantly improve public transport accessibility levels in areas which

are currently poorly served. The proposed development at Neasden looks to identify suitable space for the line and any station.

5.2.29 The A5 corridor and North Circular Road are important gateways into both Brent and Central London. They are very heavily trafficked, which creates an unattractive environment both for residents living along the route and businesses. Reducing car dominance and creating a more attractive environment designed to healthy streets standards, will have a positive impact on residents by helping to mitigate poor air quality through tree planting. It will also benefit businesses, particularly those operating in Neasden Town Centre and Staples Corner, by creating an attractive environment.

5.2.30 Other existing public transport corridors along Neasden Lane/ Blackbird Hill have reasonable levels of service. Putting additional development along them however provides for better use of capacity and levels of frequency to potentially be enhanced. Elsewhere development will not be promoted to such an extent, taking account of limited access to public transport, which might otherwise encourage increased car dependency at a time when ideally use of the car will be reduced across the Borough's roads.

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.^{MM26}

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.**

- 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.^{MM27}

Key Site Allocations

Neasden Stations Growth Area

Staples Corner Growth Area

Coombe Road

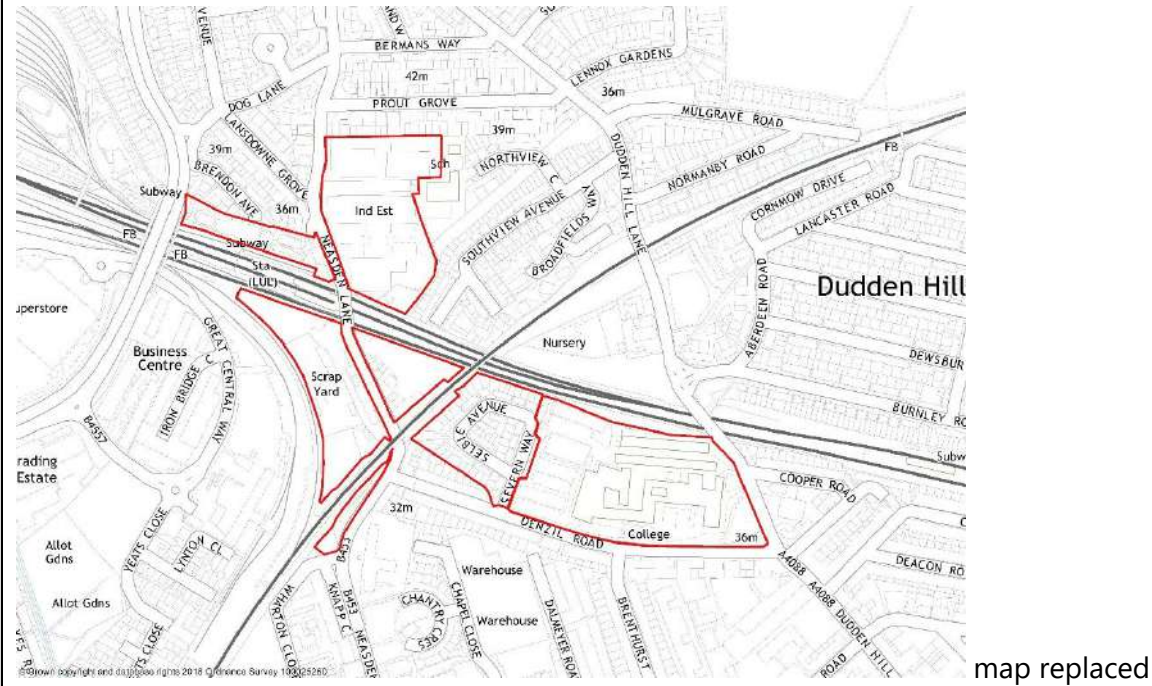
Cricklewood Bus Depot.^{MiM45}

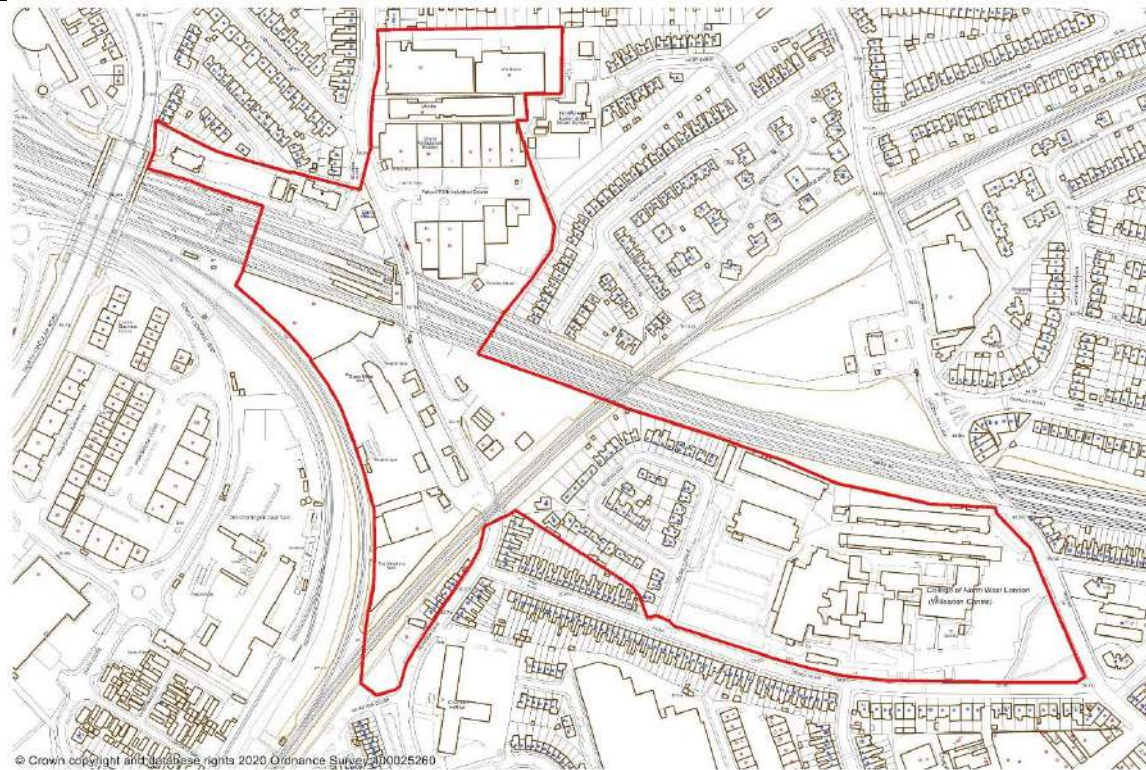
Other Policy Guidance

- ~~Staples Corner Growth Area Master Plan / Supplementary Planning Document / Area Action Plan (forthcoming)~~
- ~~Neasden Stations Growth Area Master Plan / Supplementary Planning Document / Area Action Plan (forthcoming)~~^{MiM46}

POLICY BEGA1 NEASDEN STATIONS GROWTH AREA

Site Plan





replacement map

MM?

Existing Use	Primarily employment uses comprising light industrial, storage and waste recycling and associated activities, some residential, a College of North West London campus and Neasden underground station/railway land.		
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.		
Indicative Capacity	Not yet known, Estimated to be 2000 dwellings subject to a masterplanning process which will provide additional clarity. Estimated using standard densities		
	01-5 Years	65-10 Years	101+ Years

Timeframe for Delivery	<u>0121</u>	<u>735779</u>	<u>12651100</u>
Address	Neasden Lane, Denzil Road and Selbie Avenue NW10.		
Area	11.5 ha		
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.		
Ownership	Private and public ownership		
Planning History	No relevant planning history		
PTAL Rating	3-6a both for now and in <u>(Current and 2031 estimate)</u> . The potential West London Orbital station at Neasden will increase PTAL levels further.		
Planning Considerations	<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 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 • This Growth Area will be <u>is</u> subject to a masterplan process to comprehensively identify how the area it can best maintain and ideally increase above a <u>minimum</u> plot ratio of 0.65, for the current SIL and LSIS sites' employment <u>industrial</u> floorspace (predominantly light industrial, <u>general</u> 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> • <u>Until a masterplan has been completed/ adopted by the council, no redevelopments, particularly to industrial sites will be permitted in the area. 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 be expected, rather than a piecemeal approach to ensure the most effective and efficient use of the site.
- 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.
- 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. Development should not adversely affect their ecological status.
- ~~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.
- 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. High quality pedestrian links should be provided between the existing and new station. Improvements should also be made to the connectivity with Church End and Neasden town centres.
- ~~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.~~ 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.
- Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation.

	<ul style="list-style-type: none"> • 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</u> 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 <u>Appropriate heights, extent and location of these will be identified in the masterplan and more detailed townscape/ views assessment.</u> 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 specimens of more appropriate trees</u> for the setting would be acceptable. • The existing open space along Dollis <u>Dudden Hill Lane</u> 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>
Risks	<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 <u>industrial</u> sites. • GLA policy in relation to acceptability of proposals on <u>LSIS SH.</u>
Design Principles	<p>To be fully drawn out in any future masterplan. Key points to address will be:</p> <ul style="list-style-type: none"> • ensuring successful co-location/ intensification to allow the area to prosper as an employment <u>industrial</u> location;

	<ul style="list-style-type: none"> • 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 Døllis 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.
Infrastructure Requirements	<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>^{MM68} • 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 <u>local</u> 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 <u>are</u> 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. • <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>

Justification	<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 <u>LSIS</u> 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, <u>need to provide for additional industrial floorspace,</u> the SIL and <u>LSIS</u> also provides a vital role in meeting future employment <u>industrial</u>^{MM28} needs. Site owners/ developers are showing interest in bringing sites forward. • 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.
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POLICY BEGA2 STAPLES CORNER GROWTH AREA

<p>Site Plan</p>	
<p>Existing Use</p>	<p>Primarily B1, B2, B8 <u>Light Industrial, General Industrial, Storage and Distribution</u> and Sui Generis Employment Uses, trade counters and some retail, cash and carry, restaurants and residential.</p>
<p>Allocated Use</p>	<p>Growth Area – Strategic Industrial Location subject to co-location and intensification</p>
<p>Indicative Capacity</p>	<p><u>Not yet known</u>, <u>Estimated to be 2,200 dwellings</u> subject to a masterplanning process which will provide additional clarity—<u>estimate of numbers used at this stage.</u></p>

Timeframe for Delivery	0-5 Years	6-10 Years	11+ Years
	0	0	2200
Address	Staples Corner Strategic Industrial Land, adjacent to the Edgware Road and North Circular Road		
Area	42.7 hectares		
Description of Existing Site	<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 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>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 presents 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>		
Ownership	Private Sector		
Planning History	None of a substantial nature specific to the relevance of the policy allocation.		

PTAL Rating	<p>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 <u>will increase PTAL levels.</u>^{MM?}</p>
Planning Considerations	<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 <u>undertaken between Brent, Barnet and the GLA. This will to</u> comprehensively identify how the area can best maintain and ideally increase useable employment <u>industrial</u> floorspace (predominantly light industrial, <u>general</u> industrial and storage and distribution). <u>This will</u> representing a <u>minimum</u> 0.65 plot ratio or replacement of the existing amount of employment <u>industrial</u> floorspace, whichever is the greater, whilst potentially providing a new mixed use community. • 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. • It sits within an Air Quality Management Area. as such Development will have to seek to be air quality neutral <u>positive</u> 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, <u>Brent Reservoir Site of Special Scientific Interest</u>, 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.~~
- 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. 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.~~

	<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 <u>industrial</u> 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. <u>LB Barnet</u> locally protected views from Golders Hill to Harrow on the Hill cross the site. <u>Natural England have indicated for potential impact on the flightpaths and behaviours of breeding wetland birds.</u> These matters should be considered in relation to positioning and location of tall buildings. <u>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.</u> 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. <u>These should be retained and additional street trees and green infrastructure should be provided.</u> 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.
Risks	<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. TfL and Highways England control of adjacent highways where the priority will be on maintaining highway capacity and limiting potential disruption, potentially at the expense of a higher quality public realm. GLA planning policy approval in relation to the existing SIL allocation.
Design Principles	<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 <u>industrial</u> 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 <u>local</u> 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 <u>are</u> 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. • 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 <u>industrial</u> 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 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. MM29

POLICY BESA1 COOMBE ROAD

<p>Site Plan</p>	
<p>Existing Use</p>	<p>Part Shurgard self-storage unit, part light industrial/ employment uses and part McDonalds restaurant/ drive thru.</p>
<p>Allocated Use</p>	<p>Mixed use development including on the ground floor and upper floors if needed to accommodate the required floorspace, replacement of the existing <u>employment B1-B8 light industrial and storage and distribution</u> floorspace and on the McDonalds site <u>A1-A5 retail or takeaway and/or light industrial and storage and distribution B1-B8 employment</u> uses, with the remainder being residential on the upper floors.</p>


Indicative Capacity	3886 sqm <u>light industrial and storage and distribution B1-B8</u> on the existing <u>local employment sites (0.5 plot ratio)</u> and 400 sqm <u>retail or takeaway A1-A5 uses/ light industrial and storage and distribution B1-B8</u> on the McDonalds site (replacement of existing floorspace, with potential for more employment), plus 194 dwellings.		
Timeframe for Delivery	01-5 Years	6-10 Years	10+ Years
	42	37	117
Address	Land at Coombe Road		
Area	1.35 hectares		
Description of Existing Site	The site comprises four different land ownerships. A two storey Shurgard self-storage facility on the south west, and single storey McDonalds drive-thru on the south east, and 1-2 storey light industrial premises on the north east and north west. The site is bounded on the west by the River Brent and on the east by the Brent Canal Feeder, beyond which are two storey residential properties. The north is bounded by Roger Stone Court, a residential block of 3-4 storeys and the south by Neasden Lane, beyond which is an open space.		
Ownership	Private Sector		
Planning History	18/2984 6 & 6a Coombe Road. 42 dwellings plus 727 sq.m. of flexible work space approved March 2019.		
PTAL Rating	3 existing and forecast to (Current and 2031 estimate).		
Planning Considerations	<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 <u>All the site has</u> 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 <u>location</u> 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. 		

	<ul style="list-style-type: none"> • 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>
Risks	The main risk is the appetite of the existing owners/ occupiers, particularly McDonalds and Shurgard to redevelop parts of the site.
Design Principles	<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.
Infrastructure Requirements	<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 <u>local</u> 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.
Justification	<ul style="list-style-type: none"> • The site is <u>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.</u> 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 require 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.^{MM30}

POLICY BESA2 CRICKLEWOOD BUS DEPOT EDGWARE ROAD

<p>Site Plan</p>			
<p>Existing Use</p>	<p>London Transport Bus Depot.</p>		
<p>Allocated Use</p>	<p>Mixed use development including replacement or relocation of bus depot in lower ground 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</p>	<p>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</p>	<p>0-5 Years 0</p>	<p>6-10 Years 0</p>	<p>10+ Years 202</p>

Address	London Transport Bus Depot 329 Edgware Road NW2 6JP
Area	1.35 hectares
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.
Ownership	Public and Private Sector
Planning History	None particularly relevant to the allocation.
PTAL Rating	1b and 3 existing and forecast to (Current and 2031 estimate).
Planning Considerations	<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 <u>location of uses/ buildings</u> followed <u>to ensure that the development does not create an unacceptable on or off-site flood risk.</u> 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 <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. 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.</u>

	<ul style="list-style-type: none"> • At the very least a <u>A minimum 0.65 plot ratio or replacement of the existing industrial floorspace total, or a plot ratio of 0.65</u> whichever is the greatest will be required. • Commercial development along Edgware Road at ground floor level may also be appropriate if the minimum <u>employment industrial</u> 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.
Risks	<ul style="list-style-type: none"> • The main risk is the Site availability of the site for development in the context of <u>Transport for London</u> 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.
Design Principles	<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 <u>employment industrial/commercial</u> elements and residential entrances. • <u>Setting back buildings from the railway lines provides an opportunity to enhance the wildlife corridors.</u>
Infrastructure Requirements	<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 <u>local</u> 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.
Justification	<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 <u>public transport</u> 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 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.
- 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.^{MM31}

FIGURE 14 OTHER SITE ALLOCATIONS

Ref.	Address	Size (ha)	Existing Use	Allocated Use	Indicative homes	Comments
BESA3	5 Blackbird Hill		Vacant school	<u>D4 Medical or health service, crèche nursery or day centre, learning and non-residential institutions or local community use and residential</u>	3057	Replacement <u>D4/ to address potential loss of community</u> floorspace required. ^{MM32}

FIGURE 15 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

Ref.	Address	Size (ha)	Existing Use	Permission Uses	Indicative homes	Comments
17/3698	39 Waterloo Road NW2 7TT		Offices	Residential	11	Prior Approval
16/4010	Warranty House, Dudden Hill Lane, NW10 1DD		Offices/ derelict land	Residential	136	

Ref.	Address	Size (ha)	Existing Use	Permission Uses	Indicative homes	Comments
18/1446	Jubilee House, Townsend Lane, NW9 8TZ		Offices	Residential	12	Prior Approval
13/2453	1 Barons Court		Residential	Residential	26 ^{MiM47}	
17/0298	All units 4-9, Gladstone Parade and garages rear of 4-9, Gladstone Parade, Edgware Road, Cricklewood, London NW2 6JS		Commercial/ residential	Commercial, including replacement pub and Residential	38	Ground floor commercial/ active frontage, residential uppers

5 Places

5.3 North

5.3.1 This place comprises Queensbury and parts of Barnhill, Fryent and Kenton wards. To the north it is bounded by London Borough of Harrow, to the east it is bounded by London Borough of Barnet, to the south it is bounded by the A4006 and the neighbourhoods of Kingsbury and Wembley Park, and to the west are the neighbourhoods of Barnhill and Kenton.

Figure 15 Map of North Place

Character and Culture

5.3.2 This place is largely suburban in character, comprising of neighbourhoods focused around town centres, tube stations and locally significant industrial sites.

5.3.3 There are two main character areas located within this place:

- a) **Kingsbury**, a mainly residential area which has a mixture of suburban and 'metro-land' characteristics. Houses are predominately 2-3 storeys and set in large plots. This character area contains a number of homes by the architect Ernest Trobridge in the 1920s and 1930s, ranging from thatched cottages to flats/ houses with distinctive castle features and crosses.
- b) **The A5 corridor** character area consists of Burnt Oak and Colindale town centres and surrounding residential areas. A number of the buildings date back to the 1930s period, where rapid expansion occurred as a result of the opening of tube stations in the surrounding areas. Arguably, the main feature of this area is the A5. This is a straight road which provides a direct link into Central London. It has historical significance as part of the Old Watling Road, one of the principal Roman roads in Britain.

5.3.4 There are two conservation areas within this place:

- a) **Roe Green**, where the design of the buildings, street setting and street scenes should be viewed in the context of the Garden City movement.
- b) **Buck Lane**, which includes part of seven roads whose design, grouping and setting of the buildings create a special character area. The built form and hilltop location results in impressive views, some privately enjoyed, which add to the character of the area. In addition, high quality architecture creates an enclave of attractive and distinctive character within an area of otherwise everyday suburban landscape.

5.3.5 There are 6 areas of archaeological importance within this place, two of which are located within the boundaries of Fryent Country Park. All areas of archaeological importance are shown on the policies map.

5.3.6 The most significant open space within this place is Fryent Country Park, the borough's only Metropolitan Park. There are smaller open spaces scattered throughout, such as Eton Grove Open Space, Grove Park and Roe Green Park.

5.3.7 There are a number of listed and locally listed buildings within this place. These include the Grade II listed Kingsbury Manor, a number of houses along Slough Lane,

of which two were lived in by architect Ernest Trobridge, and 3-5 Buck Lane, which were built as part of the Summit Estate by H.J. Aldous. Two Art Deco cinemas of note include the Grade II listed Savoy Cinema (last used as a bingo hall) and the former Odeon Theatre, now Hurricane Snooker Rooms.

Employment and Education

- 5.3.8 Located within this place are two locally significant industrial sites (LSIS), Colindale and Honeypot Lane (east and west) and one local employment area, Kingsbury Road. The quality of these employment sites varies. They are well occupied, but as with most industrial locations within the borough have not been subject to significant investment in the recent past; have variable public realm and quality, and accessibility to the strategic road network. In some cases, they have a relatively high representation of non-industrial uses with pockets close to residential properties.
- 5.3.9 Similar to the North West place, employment within this place is concentrated within the public administration, education and health sectors, which account for half of employment. In general, the northern part of the borough accounts for a quarter of all micro businesses, and has the joint highest level of self-employment in Brent. The Burnt Oak/ Colindale area, including the town centre and the neighbouring locally significant industrial site, has the highest concentration of the employees in this place.

Transport

- 5.3.10 The predominant PTAL level within this place is 2. There are large areas within this ward which have a lower PTAL rating than the average; the central part of the Queensbury ward has a PTAL rating of 1a-1b, and a large part of Fryent Country Park has a PTAL rating of 0.
- 5.3.11 Areas which achieve a higher PTAL rating are those with closer proximity to tube stations. Kingsbury and Queensbury stations are in this place and served by the Jubilee Line, now part of the night tube. Burnt Oak and Colindale are northern line stations in London Borough of Barnet and are 0.5 miles from their respective town centres.
- 5.3.12 There are three major roads within this place; A5 Edgware Road, A4006 Kingsbury and Kenton Roads and A4140 Fryent Way and Honeypot Lane. All three roads are located within an air quality management area. Within the Burnt Oak/ Colindale area, the A5 acts as a barrier to east-west movement.
- 5.3.13 Orbital transport within this place is dependent on the bus network. In comparison to other areas within the borough, this place experiences lower levels of congestion.
- 5.3.14 The Capital Ring Walk, a strategic walking route through London's parks, passes through Fryent Country Park, and continues in an easterly direction towards Welsh Harp Open Space. The existing significant cycling infrastructure within this place, includes an on-road cycling route along the A5 and Fryent Way, and an off road cycling route which passes through Roe Green Park.

Town Centres

- 5.3.15 There are three town centres within this place; Burnt Oak, Colindale and Kingsbury. All are classified as district centres.
- 5.3.16 Burnt Oak town centre is within the boundary of the Burnt Oak and Colindale Growth Area. It also falls within the administrative areas of the London Boroughs of Barnet

and Harrow. Brent's portion of the centre is the smallest, containing 35 commercial premises including Peacocks, whilst the majority are services. Vacancy rates are one of the highest of all Brent's town centres.

- 5.3.17 Colindale town centre falls within Brent and the London Borough of Barnet. This centre has the highest proportion of all Brent's town centres in services (63% of all units). The vacancy rate of 7% is similar to the Brent average. Out of the town centre to the north there are larger convenience and comparisons stores including an ASDA superstore, Colindale Retail Park and shops within the Oriental City and Capitol Way developments.
- 5.3.18 Currently, both Burnt Oak and Colindale struggle with their identity. There is no clear boundary identifying their start and end. The environment is dominated by vehicle movement, reflective of its history as one of London's main routes north. This, together with poor public realm and clutter has a detrimental impact on 'dwell times' and active travel uptake.
- 5.3.19 Kingsbury town centre in part also falls within the London Borough of Harrow. The centre has one of the highest proportion of convenience stores and lowest vacancy rates in Brent. Key draws within Brent's section include Tesco Express, Aldi and the Kingsbury Underground station.

Challenges	Opportunities
<ul style="list-style-type: none"> • Burnt Oak and Colindale/ The Hyde have poor quality public realm and is vehicle dominated. As a result, east to west movement across the town centre is impeded. • Burnt Oak, Colindale and Kingsbury town centres straddle two or more borough boundaries. • Cycling uptake within the borough's north is much lower than in the south. • Some of the LSIS sites are either in poor condition, have poor quality environment and public realm or have poor access to the strategic road network. • The level of deprivation varies significantly, ranging from an IMD decile score of 2 to 6. • The highest level of fuel poverty is located around Kingsbury Town Centre. • The quality of open space within this area is not greater than 'fair'; a number of parks are 'poor' quality. • SINC sites' quality within this place varies significantly. 	<ul style="list-style-type: none"> • Support and enhance the role and function of Kingsbury town centre as an ethnic/ specialist food shopping destination. • Develop the offer at Burnt Oak and Colindale town centres to appeal to existing residents, and future Growth Area occupants. • Intensification of locally significant industrial sites to support economic growth and achieve the London Plan targets. • Continue housing delivery within Burnt Oak and Colindale Growth Area, with the possibility of increasing development potential through reviewing its boundaries. • Establish and develop identities for Burnt Oak and Colindale/ The Hyde to support their role as priority town centres; • Strengthen and develop their local economy; • Support the conservation and enhancement of heritage assets within Burnt Oak town centre. This includes

Challenges	Opportunities
<ul style="list-style-type: none"> • In comparison to other centres, Colindale is less accessible. Colindale Station is over a 20 minute walk away. • Poor air quality is focused around the major roads – the A5, Fryent Way and A4006. All of which are located within an air quality management area. 	<p>restoring the Savoy cinema, through its re-use.</p> <ul style="list-style-type: none"> • Improvements to the public realm and streetscape along the A5 corridor including planting more trees, with a focus on the town centres to not only enhance aesthetics, air quality, reduce urban heat island and encourage active travel. • Improving the efficiency of movement along the A5 corridor to reduce environmental impacts of congestion, include targeted bus measures, and improve east to west links. • Improvements to the quality of open spaces and sports facilities, for example at Leybourne Road and Abbey National Open Spaces. • Additional homes within town centres and along main road intensification corridors with relatively good access to public transport.

Figure 16 High Level Plan of the Place More detailed boundaries can be seen on the Policies Map^{MiM48}

Vision

- 5.3.20 The Burnt Oak and Colindale Growth Area as part of the wider Burnt Oak and Colindale Opportunity Area will develop into a mixed, pleasant and accessible district centred along a strategic transport corridor. It will be made up of a series of distinctive, characterful places which build upon the existing strengths of the area. It will contain a range of facilities and infrastructure serving both existing and future occupiers and visitors to the area, located along a coherent and pleasant high street (the A5 Edgware Road).
- 5.3.21 Colindale and Burnt Oak town centres will continue to serve existing and new, residents of the Burnt Oak Growth Area and surrounding areas, through providing a good range of shops, community and leisure uses. Both centres will have high quality public realm, reducing vehicle dominance on the townscape, and have developed an identity which reflects their unique character. Kingsbury town centre will become a destination for ethnic/ specialist food shopping and will continue to be a popular evening economy destination.
- 5.3.22 Intensification and co-location within the locally significant industrial sites in this place will create employment industrial^{MiM49} space that meets 21st century needs and continue to provide good local employment opportunities.

5.3.23 Outside of the Growth Areas and key site allocations it is not likely that significant change will occur. This is as a result of the place's low PTAL levels and limited land availability. It is possible that new development could come forward along intensification corridors and within Kingsbury and Colindale town centres which will be classified as tall buildings. These however, will be more reflective of the suburban character in terms of scale, being no more than typically 5 storeys in height ~~or up to 6 storeys~~ with potential to go higher at strategic points^{MiM50} in town centres. Other in-fill development will respect its context in terms of height and character.

POLICY BP3 NORTH

Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:

Character, Heritage and Design

Maintain and enhance local character and distinctiveness by:

- a) **Continuing to conserve and enhance designated heritage assets within this area;**
- 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.**
- c) **Protecting, and where possible, enhancing the setting and quality of homes designed by Ernest Trobridge.**

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.**
- e) **Co-location on Honeypot Lane LSIS.**
- f) **Redevelopment of the Morrison's site to maximise land use efficiency.**
- g) **Residential development within various locations at Kingsbury town centre to support its vitality and viability.**
- h) **Intensification corridors of the A5 Edgware Road, A4006 Kingsbury and Kenton Roads and A4140 Fryent Way and Honeypot Lane – the development capacity of these areas is unknown. Residential development is dependent on whether conversions/ extensions or redevelopment of existing buildings come forward.**

Town Centres

- i) **Pursue opportunities to enhance the role and function of Kingsbury as an ethnic/ specialist food shopping destination.**

- j) Establish clear identities for the Colindale/ The Hyde and Burnt Oak through implementing public realm, building upgrades and shop facade improvements.
- 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~~ 2100 sqm class A4 cafe/ restaurant floorspace and drinking establishment floorspace by 2028. This floorspace should be directed towards the three town centres.
- l) Additional residential on upper floors or making efficient use of plots within Kingsbury, Burnt Oak and Colindale/ The Hyde town centres will be supported to increase local population catchments.

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
- n) Explore opportunities for additional secondary school provision within this place.
- o) Identify opportunities to potentially meet the need for a new leisure facility that incorporates swimming pool provision.
- p) Improve the quality of strategic sports hall sites within this place.

Employment and Skills

Supporting the local economy by:

- q) Encouraging the co-location redevelopment of Honeypot Lane LSIS to create a wide range of additional new business premises fit for modern day occupiers.
- r) Supporting transformational change at Colindale LSIS to provide intensification and the creation of a new mixed use community.
- s) Supporting new and improved employment industrial^{MM33} premises as part of a wider site development with Morrison's at Honeypot Lane (Lowther Road).

Open Space and Biodiversity

Maintaining and enhancing the quality of public parks, open spaces and biodiversity areas through:

- t) Enhancements to Leybourne Road Open Space and Abbey National Open Space.
- u) Creating at least 3 new public open spaces and squares of at least 0.2 hectares each within the Burnt Oak and Colindale Growth Area.
- v) Pursue opportunities to improve the Capital Ring.
- w) Tree planting and associated landscaping around the A5 corridor.
- x) Improve the quality of the borough's SINC sites within the area, in line with the recommendations included in SINC Review.

Transport

- y) **Reduce the traffic dominance and enhance the A5 corridor, Kenton Road and Kingsbury Road through implementing public realm improvements to achieve Healthy Street Standards.**
- z) **Support the delivery of creating new cycling links between key destinations within this area, such as open spaces, tube stations and employment sites.**

Justification

Character, Heritage and Design

- 5.3.24 The area as a whole is typically two storey, low density and suburban in character. There are exceptions to this. The significant ones are new development in the Burnt Oak and Colindale Growth Area which has some tall buildings and the area within and adjoining Queensbury LSIS which has buildings of three to five storeys. It is anticipated that the Growth Area will continue to be an area where tall buildings will be delivered.
- 5.3.25 Within this place, there are two conservation areas; Roe Green and Buck Lane. Roe Green, Brent's first conservation area, was identified for its special character with regards to building design, street scene and street setting. The area, which contains design elements that can be associated within the Garden City movement, has a distinct village feel. Buck Lane has been designated as a conservation area due to it displaying a range of buildings designed by Ernest Trobridge.
- 5.3.26 Opportunities for buildings above 10 storeys will be promoted in the Burnt Oak and Colindale Growth Area. Opportunities for taller buildings (around 5 storeys) may be considered to be appropriate to support the intensification and co-location of employment/industrial uses at the Queensbury LSIS and Morrisons sites. The same is true within the town centres (18 metres/ 6 storeys)^{MiM51} and along the intensification corridors (15 metres/ 5 storeys) of the A4006 Kingsbury and Kenton Roads and A4140 Fryent Way and Honeypot Lane.

Homes

- 5.3.27 The Burnt Oak and Colindale Growth Area in its initial designation in the Brent Core Strategy 2010 was identified as having the capacity to deliver 2,500 homes over a 15-year period. Over one third of these homes have been delivered by 2018/19. The council has reviewed this Growth Area and have identified new sites and boundary amendments to support additional residential and employment development. This development will further contribute to the creation of a mixed, vital and accessible district. Masterplanning exercises will be undertaken for key sites within the Growth Area to determine the appropriate mix of uses, form of development, infrastructure requirements and density of development.
- 5.3.28 The Capitol Valley site within the Burnt Oak and Colindale Growth Area contains an area of land designated as LSIS. Redevelopment of the site, which will be in accordance with the approved Masterplan, will need to address the requirement to intensify employment/industrial^{MiM52} uses too. In advance of the adoption of a masterplan for this site, the council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.
- 5.3.29 The Queensbury LSIS together with the Morrison's superstore site provides the opportunity to maximise the efficiency of currently underutilised land. Mixed-use

redevelopment will also support intensification of ~~employment~~ industrial space on the LSIS in accordance with the borough's London Plan 'provide capacity' status through ~~co-location with other uses~~ policy E6. In addition, it increases the potential to improve the quality of the public realm along Honeypot Lane and Cumberland Road. A masterplanning exercise will be undertaken for this site to determine the approximate mix of uses to achieve an increase in ~~employment~~ industrial^{MiM53} floorspace and retention of a food store whilst providing a significant number of new homes and any required associated infrastructure.

- 5.3.30 Elsewhere, the opportunity to provide homes is likely to be within the boundary of Kingsbury town centre. Delivery of homes within this centre will help to support its vitality and viability. There are also opportunities to provide additional homes along the intensification corridors, either through redevelopment or as small scale infill/ redevelopment/ extensions and conversions.

Town Centres

- 5.3.31 Burnt Oak and Colindale/The Hyde town centres will continue to support the growing population of the Burnt Oak and Colindale Growth Area, providing residents, both existing and new, with a range of good local shops.
- 5.3.32 To help establish a clear identity for both town centres, the council will adopt the following guiding principles:
- a) Improve the quality of the public realm to enhance walking and cycling access to the centres, and seek to increase 'dwell time';
 - b) Improve accessibility across the A5 for pedestrians;
 - c) Encourage the decluttering of the streetscape to promote 'visual good manners';
 - d) Where appropriate, promote building upgrades and improvements to the shop fronts and facades;
 - e) Enhance 'forgotten' heritage assets;
 - f) Reduce vehicle dominance within the centres, and the impact that they have on the streetscape.
- 5.3.33 Burnt Oak Colindale and Kingsbury town centres boundaries are across two or more boroughs. The council will seek to adopt a co-ordinated approach to these centres.
- 5.3.34 To support Brent's diversity, a number of the borough's centres play an important role in destinations for specialist ethnic world food and non-food shopping. The council's Retail and Leisure Needs Study 2018 identifies that the ethnic/ specialist food shops within Kingsbury make an important contribution to the centre's vitality and viability. Protection and enhancement of this role within Kingsbury Town Centre will be encouraged.
- 5.3.35 There is limited need for additional food and drink establishments within this place. Due to the presence of three supermarkets it is not currently considered necessary to plan for any more.

Community and Cultural Facilities

- 5.3.36 As identified in the council's Indoor Sports and Leisure Facilities Needs Assessment 2018, this place has a number of sports halls identified as 'strategic' in ensuring the borough's demand is met. Some require improvement to see an increase in their capacity.

- 5.3.37 The north currently has poor access to primary swimming pools. The council will consider the need for a new leisure facility within this place, taking into consideration an up-to-date analysis of demand.
- 5.3.38 The former Savoy Cinema premises at 1 Burnt Oak Broadway is a Grade II listed building. Given the nature of the site, the council considers its most appropriate use is likely to be for community or leisure, but other uses compatible with its listed status will be considered. This will bring the building back into use without impacting its integrity or special interest.
- 5.3.39 Further additional community and cultural facilities for this place will be identified through the masterplanning process that is being adopted for the three key site allocations.

Employment and Skills

- 5.3.40 There are three areas of Locally Significant Industrial Sites (LSIS) within this place. All are incorporated into site allocations. The redevelopment of these sites is expected to intensify ~~employment-industrial~~ floorspace and ensure long term safeguarding for ~~employment-industrial~~^{MiM54} uses. Providing the incentive to create these premises is currently only considered possible with cross-subsidy from other more lucrative uses, such as residential. The mixture of uses will require careful management to ensure that development is successful, and creates the environment and conditions to satisfy both the resident population and businesses. Brent Employment Land Demand Study 2015 identified a number of poor performing criteria for each site. A number of these, such as poor quality public realm, condition of buildings, and inadequate parking and servicing, could be addressed through re-development.

Green Infrastructure and Open Spaces

- 5.3.41 This place has reasonably good access to a range of public park typologies. The urban nature and limited land availability means it is important to ensure that the quality of existing open spaces are maintained, and where possible enhanced. Securing additional open space is only likely to be possible on larger scale development sites. Through adopting a masterplanning approach to large scale sites, open space requirements can be considered from the outset and contribute to a development achieving the appropriate urban greening factor.
- 5.3.42 The council will pursue opportunities to improve the Capital Ring within this place.

Transport

- 5.3.43 The projected growth in population, particularly within the Burnt Oak and Colindale Growth Area, will place additional pressure on the existing road network. To reduce such pressure, the council is looking to promote active and sustainable travel over private vehicle use within this place.
- 5.3.44 The A5, which forms the eastern boundary of this place, provides a link to central London and areas beyond, to the midlands and north. The road is heavily trafficked and creates a vehicle dominated landscape within this area. Reducing this dominance and creating an attractive environment which is designed to the healthy street standards, will help to encourage the uptake of active travel modes.
- 5.3.45 Improving the existing cycling infrastructure within this area can help to alleviate pressure on the road network. Extensions to the off-road and on-road cycling

network to key destinations within this place, such as Fryent Country Park and locally significant industrial sites, will be promoted within this place.

POLICY BNGA1 BURNT OAK/ COLINDALE GROWTH AREA

The Burnt Oak/ Colindale Growth Area is promoted for mixed use regeneration along the axis of Edgware Road. The primary emphasis in this area will be on creating a sense of place, through well considered quality design that is complementary to the remaining adjacent metroland heritage of the area. This will also seek to reduce the traffic dominance of Edgware Road through public realm improvements, including significant urban greening. New economic activity will be created along Edgware Road in the form of ground floor commercial and employment uses. Reduction in car dependency and the greater uptake of active travel should be achieved through the implementation of the London Plan Healthy Streets approach. The inclusion of additional commercial floorspace will help revitalise the area and support the growing population which is set to come forward through redevelopment.

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 2,0100 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** ^{MM34}
- **Improved cycle infrastructure along the A5**

Justification

5.3.46 Burnt Oak/ Colindale is a Growth Area that was initially designated in the Brent Core Strategy 2010, as part of the wider London Plan Burnt Oak/ Colindale Opportunity Area. The majority of the Opportunity Area lies within the London Borough of Barnet. It is a location for new homes, commercial floorspace and associated social infrastructure. By 2019 planning permission has already been granted for 892 homes and 18,848 sqm of commercial floorspace; including provision of a supermarket, food hall, garden centre, and community facilities. Much of this development has already been delivered. Additional development sites have been identified in this local plan and in recognition of this the Growth Area boundary has been extended. This new boundary is considered to form an extension to the Burnt Oak and Colindale Opportunity Area boundary previously identified to be within Brent. ^{MiM55}

5.3.47 An extensive area of Locally Significant Industrial Site off Capitol Way provides the opportunity to better meet Brent's longer term employment industrial needs through investment in new premises. Consistent with London Plan employment industrial land policies and Brent's 'provide capacity' status, ^{MiM56} this area will need to be subject to wider masterplanning to ensure effective re-provision. Subject to this process being undertaken, the area is identified as potentially acceptable for co-location to provide a more mixed use area that can also contribute towards improving the sense of place and meeting housing needs.

5.3.48 As the majority of the Opportunity Area's development will occur in the London Borough of Barnet, the council will have to work closely with it, particularly in relation to development along the A5 Edgware Road to ensure its successful implementation. A portion of Burnt Oak town centre also lies within the London Borough of Harrow. It will therefore be important that the council collaborates with them on associated strategic matters relating to Burnt Oak.

5.3.49 Much of the Growth Area remains deficient in all but metropolitan open space. Therefore, in order to produce a sustainable community, it is essential that additional green space of varying typologies is delivered. Under policy BGI1 new major development will be required to provide open space on site and provide a high level of urban greening. This will help to enhance the character of the area and provide further opportunities for recreation. This will also help meet the needs of children through the provision of informal play space for which the area is also deficient. However, additional dedicated outdoor children's play spaces will need to be secured through developments, with the proposed quantum being in line with anticipated child population growth as a result of the development.

Key Site Allocations

Capitol Way Valley

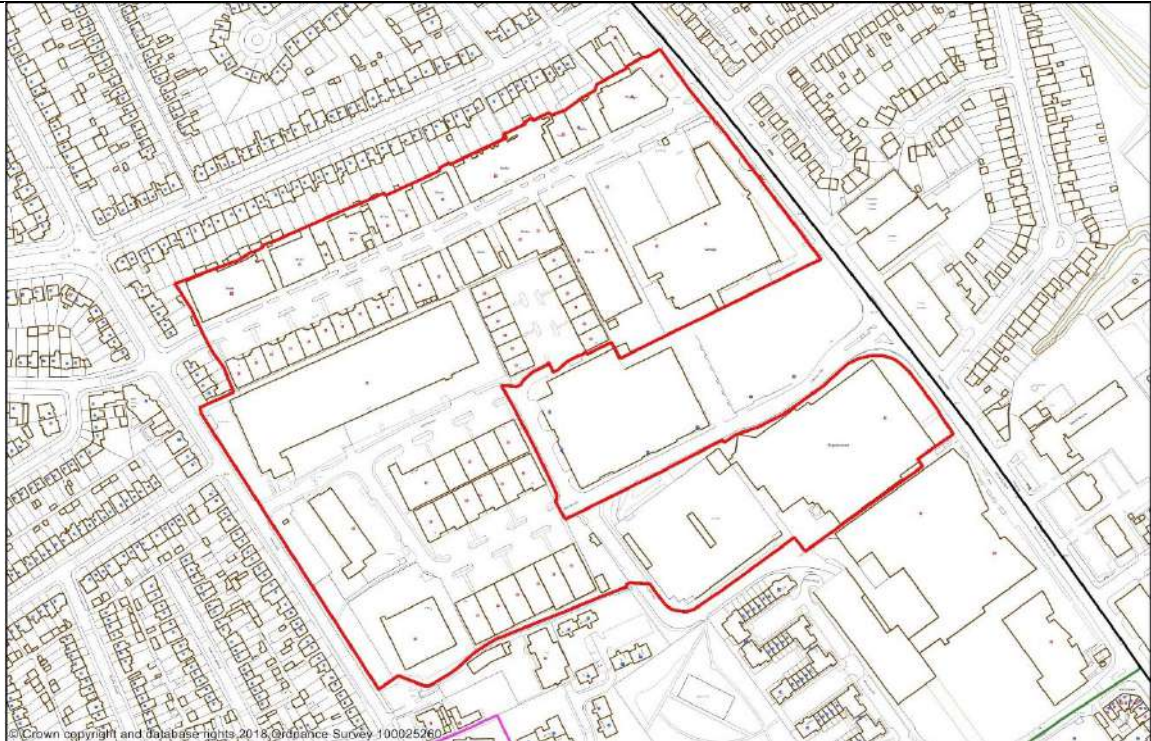
Colindale Retail Park, Multi-storey Car Park and Southon House and ~~Trust Ford Garage~~

Queensbury Honeypot Lane LSIS and Morrisons^{MIM57}

Other Policy Guidance

- Burnt Oak, Colindale and The Hyde Placemaking Plan
- ~~Masterplans for Capitol Way Valley, Colindale Retail Park and Queensbury LSIS~~^{MIM58}

POLICY BNSA1 CAPITOL WAY VALLEY

<p>Site Boundary</p>				
<p>Existing Use</p>	<p>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 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.</u></p>			
<p>Allocated Use</p>	<p>Mixed-use development comprising areas of <u>employment/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</p>	<p>A future masterplanning process <u>involving site owners/ occupiers and other stakeholders</u> will provide clarity.</p>			
<p>Timeframe for Delivery</p>	<p>0-5 years</p>	<p>5-10 Years</p>	<p>10+ Years</p>	
	<p><u>14201</u></p>	<p><u>300</u></p>	<p><u>686599</u></p>	

Address	Edgware Road NW9 0AS Capitol Industrial Park, Capitol Way, NW9 0EQ
Area	12.61 hectares
Description of Existing Site	<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 <u>to the east of the LSIS within the site allocation</u> within the eastern part is a car dealership and associated <u>servicing workshops</u>, parking/ storage land. A petrol station forms the north western<u>eastern</u> 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.
Ownership	Private Sector
Relevant Planning History	<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 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. • 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.
PTAL Rating	The PTAL rating of the site ranges from 1b-3. 1b-3 (current and 2031 estimate)

Planning Considerations

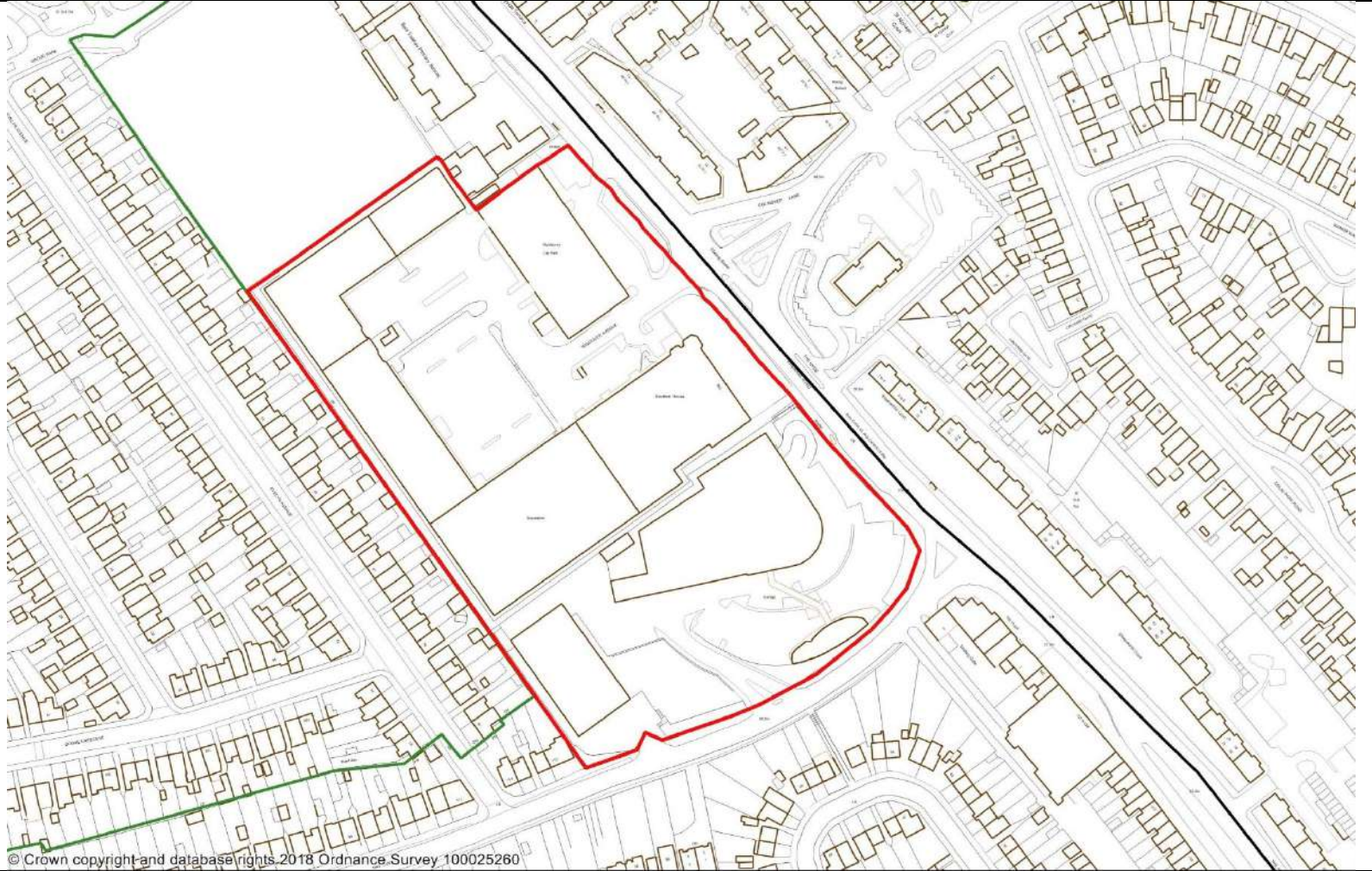
- The site is included within the amended boundary of the Burnt Oak and Colindale Growth Area ~~which has the potential to accommodate significant growth.~~
- A significant portion of the site is designated as a Locally Significant Industrial Site. The Council considers it appropriate for co-location which will be delivered consistent with London Plan policy E7.
- The whole site will be subject to a masterplan process to comprehensively identify how it can increase useable ~~employment~~ industrial floorspace (resulting in a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater), whilst contributing to the Council's vision for the Burnt Oak and Colindale area of creating '*a mixed, vital, accessible and pleasant district*'. ~~Until a masterplan for the site has been agreed/ adopted by the council, no redevelopments (apart from 17/0837 that already consented) will be permitted within this area. 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.~~
- 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.
- ~~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 in the Burnt Oak and Colindale Opportunity Area, and seek to ensureing that development contributes to creating a shared sense of coherent 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 it's retention is sought~~ In recognition of its successful trading and the lack of local alternative sites, a supermarket should be retained, although an increase in floorspace is not required. Any additional retail floorspace will be subject to the Sequential Test and an impact assessment. 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.
- ~~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 the length of Edgware Road.~~

	<ul style="list-style-type: none"> • 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 located</u> 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> • 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 <u>Parts of the site are</u> within <u>surface water flood zone 3 for surface water.</u> 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 <u>Edgware Road</u>, 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.
Risks	<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 redevelopment of the site, which could create a disjointed environment and inadequate provision on infrastructure. • 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</p>	<p>. 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 <u>industrial/employment</u> 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. • 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 <u>Taking</u> 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.

Justification	<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 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 LSISIt also has good access to services and amenities which will support intensification/ co-location. ^{MM35}</p>
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POLICY BNSA2: COLINDALE RETAIL PARK, MULTI-STOREY CAR PARK AND SOUTHON HOUSE

<p>Site Boundary</p>			
<p>Existing Use</p>	<p>Mixture of uses, including Colindale Retail Park which consists of 6 commercial units and associated car parking, a multi-storey car park with car showroom on the bottom floor, Southon House, which contains office floorspace, and a large car dealership forming the southern region of the site.</p>		
<p>Allocated Use</p>	<p>Mixed use development to include residential, retail and employment replacement industrial and office space/<u>affordable workspace</u>.</p>		
<p>Indicative Capacity</p>	<p>To be determined by a masterplanning process – estimated at this stage 500 dwellings</p>		
<p>Timeframe for Delivery</p>	<p>0-5 years</p>	<p>5-10 Years</p>	<p>10+ Years</p>

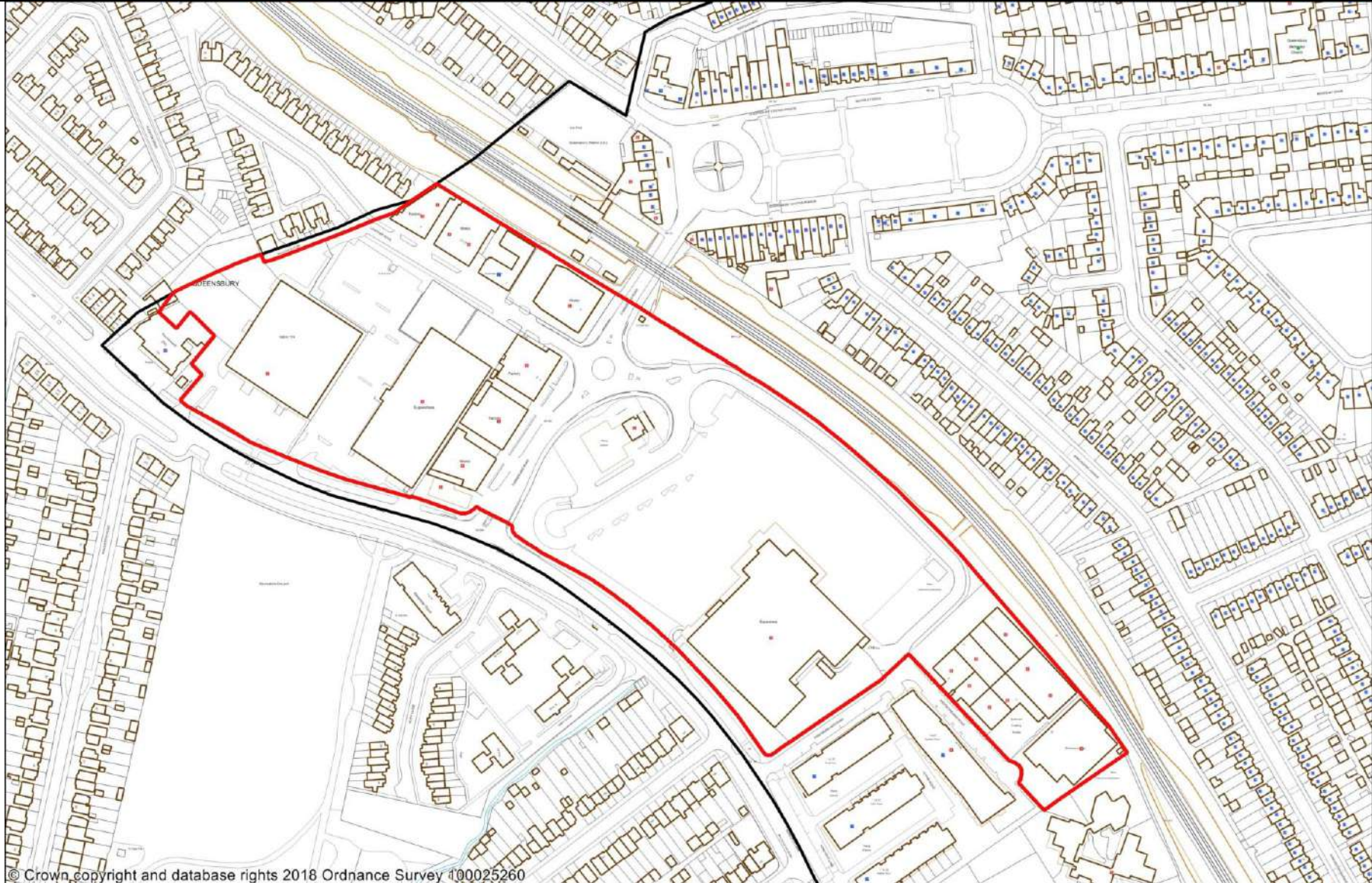
	0	<u>200100</u>	<u>300400</u>
Address	Colindale Retail Park and Edgware Road		
Size	4.02ha		
Description of Existing Site	<ul style="list-style-type: none"> The multi-storey car park is approximately 5 storeys in height and contains a car showroom on the ground floor. Adjoining and to the front of the 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 area of green space which sets the building back from the A5 road, which it adjoins to the east. 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, <u>servicing centre/workshop</u> 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 <u>2 storey residential terrace development</u>, where the predominant character is 2 storey terraced. 		
Ownership	Private Ownership		
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		
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)		
Planning Considerations	<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 <u>Tall Buildings Zone transformational area</u>, 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.
- 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 should inform any potential transport infrastructure improvements that may be needed to support the redevelopment of this site.~~
- 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 appears to be trading well, so is likely (subject to other London Plan and Local Plan retail policies) be receptive to re-provision of some retail if it is necessary from a viability perspective to encourage the site's more intensive development that makes for a more efficient use of land.
- 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.

	<ul style="list-style-type: none"> • 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.
Risks	<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> • 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.
Design Principles	<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'.
Infrastructure Requirements	<ul style="list-style-type: none"> • Increased traffic at site, as a result of residential developments <u>associated parking,</u> may require the current vehicular access to be reconsidered. • Increased traffic at site, as a result of residential developments <u>associated parking,</u> may require the current <u>traffic light junction</u> 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 ^{MM36} • 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.

Justification	The site is located within the Burnt Oak and Colindale Growth Area, which has previously been identified as a suitable location to accommodate additional homes within the borough. Furthermore, the site is currently underutilised and mixed use development at this site would be a more efficient use of land.
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POLICY BNSA3 – HONEYPOT LANEQUEENSBURY LSIS AND MORRISONS

<p>Site Plan</p>	 <p>© Crown copyright and database rights 2018 Ordnance Survey 100025260</p>
<p>Existing Use</p>	<p>Locally Significant Industrial Sites located in the northern and southern parts of the site, with a large retail superstore and associated car parking facilities occupying the central part.</p>
<p>Allocated Use</p>	<p>Mixed use development – intensification at Honeypot Lane <u>Westmorelane Road</u> LSIS, co-location at Lowther Lane Honeypot Lane <u>Lowther Lane</u> LSIS. Redevelopment of the superstore site at Honeypot Lane, to include residential and retail floorspace.</p>

Indicative Capacity	To be determined through masterplanning process. Indicative capacity at this stage of 383 dwellings		
Timeframe for Delivery	0-5 years	5-10 Years	10+ Years
	194	190	193/189
Address	Honeypot Lane, NW9		
Area	8.24 hectares		
Description of Existing Site	<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 <u>north and west</u> 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. 		
Ownership	Private		
Planning History	<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 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. Planning permission (18/2183) has been granted for the car park north east of Morrisons for the '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', subject to the signing of a S106 agreement. 		
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>		
Planning Considerations	<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. Therefor 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. 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. Any such additional space will need to pass the sequential test and an impact assessment.~~

- ~~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. and result in a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater. 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. 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.~~^{MM108}
- 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.
- ~~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.~~
- 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 within, 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 ~~employment~~ industrial 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.~~
- 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.
- 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.

Risks	<ul style="list-style-type: none"> • Fragmented ownership of the site could increase time taken to deliver, and if not properly managed result in piecemeal, rather than a comprehensive approach to redevelopment, resulting in disjointed environments. • Part of the Lowther Road LSIS is located within Harrow's administrative area. As a result, it is likely that cross-boundary working will be required to bring this site forward for development.
Design Principles	<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 <u>employment/industrial</u> 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.
Infrastructure Requirements	<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. • 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.
Justification	<p>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,^{MM37} The proposed intensification and co-location at these sites will contribute towards meeting future <u>employment/industrial</u>^{MM111} 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>

BNSA4 - FORMER MECCA BINGO SITE

<p>Site Boundary</p>			
<p>Existing Use</p>	<p>Vacant site – former bingo hall (closed in 2014)</p>		
<p>Allocated Use</p>	<p><u>Residential, community use, and employment space, some residential development.</u></p>		
<p>Indicative Capacity</p>	<p><u>Unknown – will require detailed assessment as part of planning application.</u> 50 dwellings</p>		
<p>Timeframe for Delivery</p>	<p>0-5 Years</p>	<p>5-10 Years</p>	<p>10+ Years</p>
	<p>=</p>	<p>50</p>	<p>MM?</p>
<p>Address</p>	<p>1 Burnt Oak Broadway, Edgware HA8 5LD</p>		
<p>Area</p>	<p>0.159ha</p>		
<p>Description of Existing Site</p>	<p>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>		

	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.
Ownership	Private Sector
Relevant Planning History	This forms part of the former 2011 site allocation B/C4 3-5 Burnt Oak Broadway for mixed use development to include residential and retail, and to introduce active frontages and a range of storey heights having regard for the residential properties located to the rear. Proposals at this site should contribute to transport improvements along the street frontage.
PTAL Rating	The PTAL rating of the site ranges from 4-5 (current and 2031 estimate)
Planning Considerations	<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. • 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 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.
Risks	<ul style="list-style-type: none"> • Building continues to deteriorate whilst awaiting development. • Developer aspirations being inconsistent with conserving the building's character in line with the requirements of both Historic England and the Cinema Theatre Association.
Design Principles	The special significance of the building lies in its auditorium, foyer spaces and façades. New development should look to preserve these areas of significance. However, it is accepted that to make a scheme viable, new build on top and to the side may be the only option. Some subdivision of the auditorium may also be necessary. Proposals for the building should be carefully considered with its significance in mind within an options and viability appraisal for the site.

Infrastructure Requirements	<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>^{MM38}
Justification	The site is a Grade II listed building, located within the Burnt Oak town centre boundary. Development at this site can support appropriate improvements to the Grade II listed building, with the aim of removing it from Historic England's 'Building at Risk' register. There is a preference to create active frontage within this area to support the vitality and viability of the town centre, which can be achieved through introducing community floorspace on the ground floor of this site.

FIGURE 17 OTHER SITE ALLOCATIONS

Ref.	Address	Size (ha)	Existing Use	Allocated Use	Indicative homes	Comments
BNSA5	Former Kingsbury Library and Community Centre	0.5	Pupil Referral Unit	Mixed use redevelopment including the retention of the existing Pupil Referral Unit and retention of community led use	27	
BNSA6	Ex-Volkswagen Garage	0.35	Former car showroom	Residential development	28	
BNSA7	Kingsbury Trade Centre	0.19	Car showroom, car hand wash	Mixed use redevelopment including the retention of existing employment floorspace		Within an area of archaeological importance.
BNSA8	Queensbury Underground Station Car Park, Turner Road	0.2	Station Car Park	Residential plus re-provision of car parking required for station	36	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> ^{MM39}

FIGURE 18 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

Ref.	Address	Size (ha)	Existing Use	Planning Permission	Indicative homes	Comments
15/1337	Oriental City, Edgware Road, NW9 0JJ		Buildings which housed 'Oriental City', a commercial and retail centre that provides goods and services orientated towards the Asian Market.	Residential, Retail/ Leisure, Primary School	126	Partially complete. Remaining works still in progress 2019. ^{MiM59}
17/1342	Allied Carpets, 3 Burnt Oak Broadway HA8 5LD	0.27	Three-storey building with large scale retail facility at ground floor level	Residential	38	Construction commenced summer 2014 and is ongoing. ^{MiM60}
17/1829	The Willows, Honeypot Lane	0.24	Vacant residential care home	Residential	50	Supported accommodation. <u>Aiming for completion summer 2022.</u> ^{MiM61}
16/2353	Watling Gate, Edgware Road, Kingsbury, London, NW9 6NB	0.11	Office	Residential	43	Prior approval. ^{MiM62}
18/2183	Carpark north east of Morrisons, Honeypot Lane & Vacant Land at the junction of Westmoreland Road, & Cumberland Road	0.7	Parking/ vacant land	Residential	194	Works started early 2019
17/0837	1-8 Capitol Industrial, Capitol Way, NW9 0EQ	1.74	B8 ^{MiM63} Storage and distribution	Commercial/ residential	414	

5.4 North West

5.4.1 This place comprises Northwick Park and parts of Barnhill, Kenton, Preston and Sudbury wards. The place is bordered by London Borough of Harrow to the north and west (Harrow-on-the-Hill). To the east is Fryent Country Park and Wembley Park and to the south is Sudbury.

Figure 19 Map of North West Place

Character and Culture

5.4.2 The North West place is largely suburban in character, with housing focused around town centres, tube stations and significant pieces of social infrastructure (Northwick Park Hospital and the Harrow Campus of University of Westminster).

5.4.3 There are four main character areas located within this place. The variations in character are not significant as the residential element predominantly within this place is based on suburban metroland 'Mock Tudor' vernacular. Northwick Park character area contains Northwick Park Hospital. This provides a stark contrast due to its scale and angular concrete and glass architecture. Its visibility is increased due to the open aspect of the soft landscaping of Northwick Park Metropolitan Open Land (MOL). This encloses it on two sides (east and south). Kenton character area is suburban residential focused around the high street and tube station. Similarly, Preston Road character area is focussed on a high street which gradually slopes from north to south and contains Preston Road Station in its centre. Another key character area within this place can be around Sudbury Court Drive, consisting of large houses which vary in style, with large front gardens, set back behind a pathway, access road and grass verge.

5.4.4 There are three conservation areas located within the place:

- a) Northwick Circle - a typical 1920's and 30s residential development whose high quality architectural character is underpinned by relatively wide and generous roads, tree lined with grass verges between road and pavements
- b) Sudbury Court - housing development planned either side of a central spine of The Fairway. Houses are spaciouly positioned amongst garden buffers and tree lined roads, aided by gentle curves which help to define the garden suburb character.
- c) Mount Stewart - a typical 1920's and 30s residential development that contains housing that are Mock-Tudor style with variable elevations. Housing is set in wide generous roads, which are tree lined with grass verge buffers between the roads and pavement.

5.4.5 Located on the boundary of this place is Sudbury Cottages Conservation area, which contains the remains of this part of the historic core of Sudbury.

- 5.4.6 There are two sites of archaeological importance within this place – Sudbury Court and Lyon’s Farm. Sudbury Court is also designated as an Archaeological Priority Area.
- 5.4.7 The most significant open space within this place is the designated Metropolitan Open Land (MOL) of Northwick Park. The adjoining site referred to as Ducker Pool, is designated as a Grade I SINC of borough importance. Smaller open spaces, and other SINC sites are scattered throughout this place including John Billam Playing Fields, Woodcock Park, Woodcock Park North SINC, Wealdstone Brook from Kenton to the Jubilee Line and Kenton Grange. Northwick Park and Kenton Railside, a Grade I SINC of borough importance, also acts as a wildlife corridor within this place.

Transport

- 5.4.8 The predominant Public Transport Activity Level (PTAL) within this place is 2. Higher PTAL ratings are located around Northwick Park and Kenton stations. Areas with particularly poor transport accessibility are located within the south western corner, and scattered through the central part of this place.
- 5.4.9 There are four underground stations located within this place; Kenton, Northwick Park, South Kenton and Preston Road. On the place’s southern boundary is North Wembley Station.
- 5.4.10 The roads which form the northern boundary (A4506) and western boundary (A404) of this place are London Distributor Roads.
- 5.4.11 The Capital Ring goes from east to west across the central section of this place, passing through Northwick Park. It is a strategic walking route that connects the 33 London boroughs and their greenspaces.

Employment and Education

- 5.4.12 Located within this place is the East Lane Business Park, which is designated as a Strategic Industrial Location (SIL). It is a mixture of mainly older industrial premises, with a very large modern retail distribution unit supplemented by a small office element. It has a number of key strategic characteristics. These include good access to the strategic road network and a ‘good and fit for purpose industrial land supply’ which makes it supportive of employment-industrial^{MiM65} activities.
- 5.4.13 Employment within this place is concentrated within the public administration, education and health sectors. In general, the northern part of the borough accounts for a quarter of all micro businesses, and has the joint highest level of self-employment in Brent (14% of economically active people being self-employed). The northern part of Northwick Park, where the hospital is located, has one of the highest concentrations of employees in Brent, providing approximately 8,000+ jobs. East Lane Business Park is the second highest, providing approximately 4,000-8,000 jobs.

5.4.14 There are 8 primary schools, 3 secondary schools and 1 all through located within this place. The place also includes the University of Westminster Harrow campus, which focuses on design, creative and digital industries.

Town centres

5.4.15 There are two town centres located within this place: Kenton Road and Preston Road.

5.4.16 Kenton is a district town centre. Part of it lies within the London Borough of Harrow, although the majority is within Brent. In comparison to other centres, Kenton has a relatively high proportion of services. Anchors include Sainsbury’s and Kenton Bridge Medical Centre. It also contains Kenton underground and overground station. Vacancy rates within Kenton are equivalent to the London average.

5.4.17 Preston Road is a district town centre. It extends along the Preston Road from Carlton Avenue East to The Avenue and includes Tesco Express as an anchor. It also contains Preston Road underground station. Similar to Kenton, Preston Road has a relatively high proportion of services but also has a range of comparison and convenience outlets. This town centre has relatively low vacancy rates in comparison to borough-wide levels.

Challenges	Opportunities
<ul style="list-style-type: none"> • This place is generally poorly served by public transport. This has an impact on the accessibility of key destinations within this place, including Northwick Park Hospital and East Lane Business Park. • There is some variation in the levels of deprivation within this place, with areas of higher deprivation concentrated around the southern boundary and north eastern part of this place. • While there is no open space deficiency within this Place, there is significant variation in the levels of accessibility to the different public park typologies. • Kenton Town Centre straddles the London Borough of Brent and Harrow’s administrative areas. • After housing cost, child poverty within the Northwick Ward is 13%, Preston is 14%, Kenton is 10% and Sudbury is 18% 	<ul style="list-style-type: none"> • The Northwick Park development provides a number of opportunities for this place, which includes: <ul style="list-style-type: none"> • Improvements to the Northwick Park Hospital and Clinical Research Centre; • New and improved sports pavilion; • Provision of affordable and specialist homes; • Improvements to Northwick Park and Ducker Pool SINC (Grade I); • Enhancements to the Capital Ring section within Northwick Park. • Improving sustainable transport access to, and within, this place through the implementation of a variety of transport schemes, such as: • Improvements to increase capacity and creating step-free access at Northwick Park Tube Station;

Challenges	Opportunities
<ul style="list-style-type: none"> • Child obesity varies significantly across the place – areas within the southern part have relatively low childhood obesity (2.3-6.3%), whilst in the north childhood obesity is high (11.3-23.4%). • Some areas of the place have a higher proportion of Over 50's than others. • More than 1 in 6 residents were aged 65 and over in the Kenton Ward. • Variations in proficiency in English are great – areas of Northwick Park and Kenton are lower than Preston and Sudbury. • English is not the main household language for 19.8% of households within Northwick Park, with 0.9% of households not speaking English. The proportion of households in Kenton where no one was able to speak English was 19.6%. • The uptake of cycling within the north of the borough is low, with it only accounting for 0-1% modal share of journeys. 	<ul style="list-style-type: none"> • Implementation of Cycleways and other schemes within this place, in line with the Transport Strategy, to improve active travel; • Improving the Capital Ring and other pedestrian routes Northwick Park; • Applying the '<i>Healthy Streets Approach</i>' to improve pedestrian and cycling connections between Northwick Park Station and Kenton Town Centre. • Increasing the quality of the open spaces and sports facilities within this place, which can be achieved through: • Pursuing pitch improvement opportunities at Northwick Park; • Investment into purpose-built, non-turf cricket practice facilities at Northwick Park; • Improved signage, pathways and infrastructure in the parks and open spaces within this place; • Public realm improvements within Kingsbury Town Centre. • Intensification of employment <u>industrial</u>^{MiM66} uses at East Lane. • Enhanced level of convenience goods provision within the two town centres.

Figure 20 High Level Plan of the Place More detailed boundaries can be seen on the Policies Map^{MiM67}

Vision

5.4.18 A place which predominantly seeks to retain and enhance the characteristics of its metro-land past. The place will be comprised of a series of attractive suburban

neighbourhoods, whose character and local distinctiveness are enhanced through the Northwick Park Growth Area.

POLICY BP4 NORTH WEST

Proposals should plan positively to deliver the place vision by adhering to the following principles:

Character, Heritage and Design

Maintain and enhance local character and distinctiveness by:

- a) **Continuing to conserve and enhance designated heritage assets within this area**
- b) **Protecting, and where possible, enhancing the established metro-land characteristics of the place**
- c) **Concentrating new tall buildings in the Northwick Park Growth Area, town centres and intensification corridors (A4006 Kenton Road)**

Homes

- d) **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.**
- e) **Delivering mixed-use development on the Sainsbury's Kenton Road site**

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**
- g) **Managing the likely overall reduction in length of the Preston Road and Kenton Town Centres**

Community and Cultural Facilities

- h) **Protecting and enhancing playing pitchfield provision at Northwick Park, JFS School, Claremont High School, John Billam Playing Fields and Tenterden Sports Ground**
- i) **Encouraging community use Bryon Court Primary School's sports facility**

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 ^{MM40} **the following improvements to community and cultural facilities should be achieved:**

- j) Redeveloped and/or enhanced university hospital**
- k) Redeveloped and/or enhanced university facilities**
- l) Enhancements to Northwick Park Sports Pavilion**
- m) Improved setting of and better integration of open space within the site to Northwick Park**

Employment and Skills

Supporting the local economy by:

- n) Retaining and encouraging intensification of SIL land at East Lane Business Park**
- o) Promote employment growth/skills within the Northwick Park Growth Area**

Open Space and Biodiversity

Maintaining and enhancing the quality of the well-used, cherished public parks, open spaces and biodiversity areas through:

- p) Enhancements to Northwick Park, Woodcock Park and Pellat Road Sports Ground**
- q) Pursuing opportunities to increase the provision of pocket parks**
- r) Exploring opportunities to create a Local Nature Reserve at Ducker Pool**
- s) Protecting and enhancing existing wildlife corridors within this place**
- t) Improving the Capital Ring route within this place in the aim of creating a new Green Chain**

Transport

- u) Improving Northwick Park station to increase capacity and establish stepfree access**
- v) Implementing Cycleways to encourage uptake of active travel**
- w) Improvements to road junctions around Northwick Park Growth Area and station with the view of improving road safety**
- x) Improving walking and cycling infrastructure within this place, with a focus on improving pedestrian and cycling links between the four tube stations.**

Justification

Character, Heritage and Design

5.4.19 There are three existing conservation areas within this place which have been designated due to their distinct and special character. Development within and adjacent to these areas will be expected to conserve or enhance their character. Due to their designation, it is not anticipated that there will be a significant amount of development in these areas.

5.4.20 The predominant character of this area is residential suburban, with a number of areas displaying characteristics which can be linked to the metro-land movement. Tall buildings will not be in keeping with the character of the majority of this place. An exception to this will be Northwick Park Growth Area, where the presence of tall

buildings has already been established. In addition, town centres and intensification corridors will accommodate development of potentially around ~~18 metres (6 storey)~~ and 15 metres (5 storeys) respectively, with the opportunity to go higher at strategic points in the town centres.^{MiM68}

Homes

5.4.21 Northwick Park Growth Area provides the opportunity to provide a significant amount of housing in addition to satisfying a number of strategic policy objectives. The Growth Area has the potential to support student housing and large-scale purpose built shared living accommodation as well as mainstream housing. As public land it is anticipated that it will make a significant contribution towards affordable housing needs.

5.4.22 The Kenton Sainsbury's site provides an opportunity for comprehensive redevelopment of a low-density supermarket site. Its proximity to Kenton underground station makes it appropriate for intensification, incorporating residential development. The redevelopment of this site should ensure a replacement food store of comparable size with a layout and store entrance that better addresses the town centre.

5.4.23 Additional homes are likely to be concentrated along the A4006 Kenton Road intensification corridor (a main road with relatively good public transport), within the town centres, local shopping centres and on small scale infill/ redevelopment sites, conversions and extensions. The volume of delivery through these sources is uncertain.

Employment and Skills

5.4.24 Employment and Skills,^{MiM69} In comparison to other places within the borough, there are limited employment opportunities within the North West. There are two areas within this place that offer the opportunity to provide employment space and job opportunities. These are Northwick Park Hospital and Clinical Research Centre, and East Lane SIL. The employment function at these two areas will be protected, and where possible, enhanced.

5.4.25 The Northwick Park Growth Area provides an opportunity to enhance or redevelop the facilities at Northwick Park Hospital and Clinical Research Centre, and introduce an element of commercial and flexible workspace. Additional jobs on this site will help satisfy the strategic objectives of the borough. As will proposed state-of-the-art teaching spaces for both the University of Westminster and the university hospital.

5.4.26 East Lane SIL has a number of positive characteristics which in the context of London Plan policy make it a good candidate for further intensification for employment industrial^{MiM70} uses.

Retail and Town Centres

5.4.27 Preston Road and Kenton Road town centres will continue to support the local population of this place.

Community and Cultural Facilities

5.4.28 The need for new community facilities within this place will primarily be within the Northwick Park Growth Area due to the significant increase in population that will occur as a result of the proposed housing development.

5.4.29 Improvements to Northwick Park Hospital, and the provision of additional hospital floorspace within this area, will be supported through residential development within the Northwick Park Growth Area. Improvements anticipated include upgrading the teaching space offered within the hospital to improve its efficiency.

5.4.30 Furthermore, the opportunities to improve the sports pavilion to support the development that is to come forward within the Growth Area will be supported. ~~One option being considered is to swap the land currently occupied by the sports pavilion and car park with an equivalent area adjacent to Northwick Park station to create an open, active and welcoming frontage by the station. The location of the new sports pavilion has yet to be agreed. Any MOL land swap associated with this will need to demonstrate that it is in compliance with London and national policy, and ensure that there is no net loss in open space.~~^{MiM71}

5.4.31 As part of the development, there is a desire to create a 'local hub', that will provide various uses such as commercial, retail and community uses. The exact nature of the 'local hub' will be informed by community consultation.

5.4.32 The potential to develop a new energy centre to supply energy to the University, Hospital and residential units will be explored.

5.4.33 The council will explore opportunities to increase sports hall provision within this place at appropriate site(s).

5.4.34 Northwick Park has been identified as a strategic site for playing pitch provision within the borough, due to the number of pitches on site and the range of sports it supports. The council will continue to protect playing pitch provision at this site, and where possible, pursue opportunities for its enhancement. Additional playing pitch sites that will be protected, and where possible enhanced, within this place include the pitches at JFS school, Claremont High School and Tenterden Sports Ground. There are also a number of other school sites within this place which can contribute to ensure adequate playing pitch provision within the borough.

Open Space and Biodiversity

- 5.4.35 Whilst there is no open space deficiency within this place, there is a significant deficiency in access to pocket parks as there are none. Limited land availability means that Northwick Park Growth Area provides the best opportunity to increase provision of this typology.
- 5.4.36 In addition to increasing open space provision, it is important to ensure that the quality of the existing open spaces within this place are enhanced. The council's qualitative assessment on open space found that overall quality of public park and open space provision was 'fair'. Scope for improvements were identified, in particular for Pellat Sports Ground and Woodcock Park.
- 5.4.37 Improvements to Northwick Park will be required to support the growth in population as a result of the development within the adjoining Growth Area. Improvements to the park will need to ensure that local needs are satisfied and that the district park remains a first class recreational facility. This must include the increased provision of green infrastructure with the aim to achieve a net gain in biodiversity.
- 5.4.38 Northwick Park and the Ducker Pond Pool^{MiM72} are a designated SINC site of borough importance (Grade I). The site's diverse habitat mosaic of woodland, short and long grassland, ponds, hedges, tree lines, mature/ veteran trees and streams, means that it is one of the more valuable biodiversity sites in the borough.

Transport

- 5.4.39 The projected growth in population across this place will place additional pressure on the road network, particularly around Northwick Park Hospital where most of the growth is focused.
- 5.4.40 One of Brent's Long Term Transport Strategy (LTTs) Objectives is to '*Increase the uptake of sustainable modes, in particular active modes of travel*'. There are a number of schemes and initiatives which can be implemented within this place which can help to achieve this objective. Such schemes include improving the public realm and creating a better link between Northwick Park Station and South Kenton Station.
- 5.4.41 As mentioned above, public transport accessibility levels within this place are low in comparison to other areas within the borough. However, improvements which will increase the capacity and introduce step-free access at Northwick Park Station will improve the public transport accessibility levels around the Northwick Park Growth Area.
- 5.4.42 The uptake of cycling within the north currently lags behind the south. The implementation of Cycleways can encourage residents to cycle, which in turn will contribute to the reduction in congestion. The LTTs indicated that resources will focus on improving cycling uptake within the north of the borough. The council's Cycling Strategy identifies that a number of new cycle routes are being considered within this area. These routes will improve the existing local cycle network, and look

to create new links between key destinations, such as the tube stations and open spaces.

- 5.4.43 Improving road safety within the borough is a priority. In particular, road safety around the Northwick Park Hospital area has been identified as an issue. The design of a new junction to provide better vehicle access and egress, together with associated improved pedestrian crossing facilities can help reduce incidences of accidents, as will amendments to the Kenton Road/Watford Road roundabout.

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.**

- 5.4.44 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.
- 5.4.45 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.
- 5.4.46 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.
- 5.4.47 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.
- 5.4.48 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 delivery 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.^{MM41}

Key Site Allocations

Northwick Park Hospital

Sainsbury's Kenton Road

Other Policy Guidance

- ~~Northwick Park Master Plan/ Supplementary Planning Document/ Area Action Plan~~
(forthcoming)^{MiM73}

POLICY BNWGA1 - Northwick Park Growth Area

<p>Site Boundary</p>	<p>© Crown copyright and database rights 2016 Ordnance Survey 100025280</p>
<p>Existing Use</p>	<p>University of Westminster Harrow Campus and associated student accommodation, Northwick Park Hospital and associated car parking, residential, Northwick Park sports pavilion and Underground Station.</p>
<p>Allocated Use</p>	<p>Growth Area - the site has been allocated for mixed used development, <u>including a small amount of commercial floorspace and Additional</u> 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</p>	<p>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>

Timeframe for Delivery	10-5 Years	56-10 Years	101+ Years
	650218 (net 390)	1950 (net 910)1,702 (1,367 net)	-
Address	Northwick Park Hospital, Watford Road, Harrow, HA1 3UJ University of Westminster, Northwick Park, Middlesex, HA1 3TP Northwick Park Tube Station		
Area	30.5 ha		
Description of Existing Site	<p>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 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>		

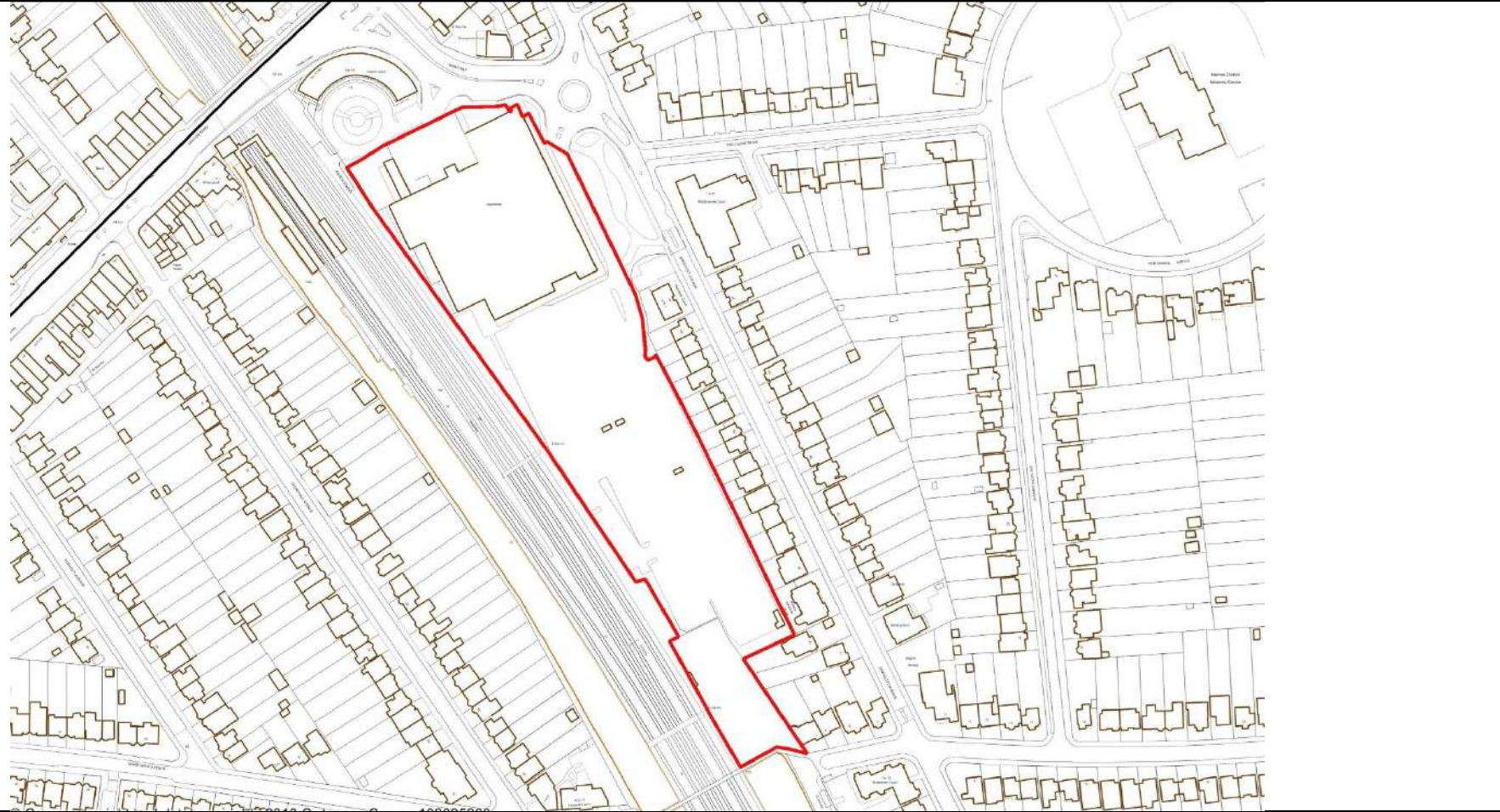
	<p>University of Westminster comprises a number of buildings forms the western part of the Growth Area. Between these there are some areas of open/ communal space. Halls of residence are located within its northern part with an associated green space, not currently publicly accessible. This green space 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> <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>
Ownership	<p>The London Borough of Brent, London North West University Healthcare NHS Trust, the University of Westminster and Network Homes are the key landowners, 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. Transport for London own Northwick Park station and adjacent railway land.</u></p>
Relevant Planning History	<p>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 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>

PTAL Rating	<p>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 Residential Accommodation and Northwick Park sports pavilion.</p> <p><u>2-5 (current), 2-6a (2031 estimate)</u></p>
Planning Considerations	<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 north. Consideration should also be given to impact on the locally protected views as identified in the <u>Harrow Local Plans of Harrow (Country Park at Wood Farm setting corridor) and Barnet (Golders Hill Park toward Harrow on the Hill)</u> . 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. • 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 <u>No net loss of open space will be acceptable.</u> 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. • A ball strike assessment will be <u>required and any necessary ball stop mitigation implemented prior to the development's impact</u> to ensure that new development does not compromise the role of the MOL in terms of sports provision.

	<ul style="list-style-type: none"> • 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 <u>as a Growth Area</u> 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 not exacerbate this the congestion on Watford Road, and ideally new junction solutions will improve it. • 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. Pedestrian access to the site from South Kenton in particular should be enhanced, including from Northwick Park Station which will need No-step free access is currently available to all 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 to 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 surface water flood zone 3 for surface water flooding, the majority being highway land. In the south of the site, flooding from potential reservoirs failure exists. Some northern parts are susceptible to sewer flooding. More detailed assessment will be required through a site specific flood risk assessment.
Risks	<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,

	<p>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>
Design Principles	<p>The design and layout of the scheme should be determined by a comprehensive master planning exercise. Key points that will need to be addressed include:</p> <ul style="list-style-type: none"> • ensuring the scheme blends into Northwick Park and does not have an inappropriate impact on its setting; • sufficient open space provision is found throughout the site, including retention of existing mature trees, the provision of additional trees, and the provision of any open space lost; • providing high quality public realm and improved pedestrian environment between the development, Northwick Park Station and South Kenton; • edges of development responding to the suburban nature of the surrounding area, particularly to the north; • tall buildings on the site should respond to the height of the existing hospital buildings, and ensure that there is a stepping down towards the MOL and residential area to the north.
Infrastructure Requirements	<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. • 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. • Improved sports and leisure facilities as part of the MOL land swap, green infrastructure and public realm throughout the site. MM42 • 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.
Justification	<p>Northwick Park Growth Area provides an opportunity for a fundamental review of separate uses over a significant area that have been developed in a piecemeal fashion over many years with a view to improving the efficient use of land use. This will provide health, educational, recreational and public transport facilities that can better meet needs, as well as addressing the requirements in Brent for additional homes.</p>

BNWSA1: KENTON ROAD SAINSBURY'S AND ADJOINING LAND

<p>Site Boundary</p>			
<p>Existing Use</p>	<p>Sainsbury's superstore and associated car parking and some railway land.</p>		
<p>Allocated Use</p>	<p>Mixed-use development incorporating a retail store of comparable size and residential development.</p>		
<p>Indicative Capacity</p>	<p>Superstore of equal size and up to 150 dwellings.</p>		
	<p><u>10</u>-5 Years</p>	<p><u>56</u>-10 Years</p>	<p><u>101</u>+ Years</p>

Timeframe for Delivery		<u>150100</u>	<u>50</u>
Address	1 Nash Way, Kenton, HA3 0JA		
Area	2.45 hectares		
Description of Existing Site	The site currently consists of one large superstore (Sainsbury's) surrounded by large amounts of parking. There is a small piece of railway land included to the south. The site is bordered by a railway line to the west. Dwellings back onto the car park along the eastern edge of the site. There is also a small area of open space to the east of the site, which provides a green barrier between the store and Draycott Avenue. Located to the north of the site is Kenton Town Centre; the site forms part of the town centre boundary but is currently set back from the majority of the shops due to the road layout.		
Ownership	Private and small part public ownership		
Relevant Planning History	No planning history of relevance.		
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. 4-5 (current), 5-6a (2031 estimate)		
Planning Considerations	<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. • If parking is provided it should be made publically available and be designed to serve the wider town centre. • 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. and needs to be improved <u>this needs to be part of a development solution.</u> • 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 require appropriate mitigation to ensure occupants of any development are not adversely impacted by noise and vibration. The railway is also a designated 		

	<p>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.
Risks	Incentive for Sainsbury's to develop given potential impacts on operations of the existing store which is trading well.
Design Principles	<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. • 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.
Infrastructure Requirements	<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.^{MM43} • 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
Justification	The site provides an opportunity for mixed-use development in a sustainable location. The car park is too large compared to the demand for spaces. The site currently has limited visual impact/ generation of linked trips to the high street of Kenton due to its set back location. The re-development of this site will offer the opportunity to better incorporate the superstore into the town centre frontage, and provide a more appealing development. As encouraged within the London Plan, mixed-use redeveloped is encouraged at supermarket sites, and development within close proximity to tube stations should seek to optimise the potential for housing

delivery. The London Plan also encourages residential development within town centre locations as it will help to provide homes in well-connected places that will help to sustain local communities.

FIGURE 21 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

Ref.	Address	Size (ha)	Existing Use	Planning Permission	Indicative homes	Comments
17/3717	79-83 Kenton Road	0.18	3 two-storey dwellings	Residential	39 (36 net)	<u>Works started on site late 2019</u> ^{MiM74}
16/3294	Clock Cottage next to Kenton Road Garage	0.24	Former stable used for storage	Residential	17	Assisted Living Accommodation. <u>Works to complete late 2022.</u> ^{MiM75}

5 Places

5.5 South Place^{MiM76}

5.5.1 This place comprises Harlesden, parts of Kensal Green, Stonebridge, Tokyngton, and Willesden Green. To the south it is bounded by Park Royal one of Europe's largest industrial estates and Old Oak Opportunity Area, to the east Kensal Green and Willesden and to the north a railway lane separates it from Wembley.

Figure 22: Map of South Place

Character and Culture

- 5.5.2 This place has a diverse community and history, which is reflected in its buildings and attractions. Character varies with pockets of industry and retail warehouses to the north, and to the south large open spaces, terraced housing and Victorian High Streets. Stonebridge Estate, which comprised high rise development from the 1960/70s, has been subject to investment and redevelopment. St Raphael's is a housing estate with a mixed architectural character, from 1960s three-to-^{MiM77} four storey apartment blocks to more traditional two-storey terraces to the east.
- 5.5.3 The Shri Swaminarayan Mandir Hindu Temple is an important landmark and visitor attraction that highlights this area's cultural importance. It was hand carved from 5,000 tonnes of Italian and Indian marble in India before being assembled in Neasden. Other local landmarks include the Jubilee Clock which forms the focal point of Harlesden. Harlesden has a vibrant Caribbean culture, and is considered the place where reggae music was introduced to London in the 1960s. It is still home to Hawkeye reggae record shop, and local musicians.
- 5.5.4 Other notable community and cultural attractions include the Roundwood Children's Centre, SUFRA community kitchen and edible garden in St Raphael's' Estate, and Bridge Park Leisure Centre in Stonebridge.

Town Centres

5.5.5 Harlesden Town Centre's offer reflects its diverse community, with authentic Portuguese, Brazilian and Jamaican restaurants and shops. Church End is a smaller neighbourhood centre. Its offer includes an Afghan Cultural Centre and a market which is currently being redeveloped.

Employment and Education

5.5.6 This Place also contains the southern part of Wembley SIL either side of the North Circular Road. Locally Significant Industrial Sites in Church End contain low density employment industrial^{MiM78} uses and have a poor quality environment. Brentfield Locally Significant Industrial Site in Harlesden contains more modern managed workspace and a power station. Being located in between Park Royal and Wembley industrial sites, a high proportion of jobs in this place are in manufacturing and wholesale, logistics and transport. Harlesden however also demonstrates an entrepreneurial culture with the highest level of business start-ups in the borough alongside Wembley.

Open Space and Biodiversity

5.5.7 The River Brent, which is surrounded by a large open space known as Brent River Park, runs to the west of St Raphael’s Estate. To the east Roundwood Park offers opportunities for recreation, and is adjoined by the Grade II Listed Willesden Jewish Cemetery, which has benefited from Heritage Lottery Funding for enhancements including a new visitor centre. Sports pitches are located at Tokyngton Recreation Ground (part of Brent River Park) and Gibbons Recreation Ground.

Transport

5.5.8 The south of this place has good links to Central London via Harlesden, Stonebridge Park and Willesden Junction stations, which are served by the Bakerloo Line and Overground. The planned High Speed 2 and Elizabeth Line interchange at Old Oak will further improve connectivity. The north however is more dependent on buses, which are less reliable due to road congestion.

5.5.9 Cycle routes are predominantly on-road in this place and include routes from Stonebridge to Kensal Green, and Harlesden Station to Roundwood Park to the east and Church End to the north. Exceptions include off-road routes along Brent River Park and between Harlesden and Roundwood Park. The Brent Long Term Transport Strategy identifies the potential for future cycle routes from Harlesden to Wembley and Cricklewood to the north, and Old Oak to the south.

Challenges	Opportunities
<ul style="list-style-type: none"> • Neasden Temple, although an asset which attracts people from around the world, is currently challenging to travel to by walking or cycling. Some surrounding buildings also do not complement its setting. • Wembley Point, Bridge Park Leisure Centre and the Unisys Building at Stonebridge Park currently present an unattractive gateway into the borough. Bridge Park is a dated leisure facility. • The Indices of Multiple Deprivation indicates St Raphael’s Estate is one of the most deprived areas in Brent, with high unemployment levels and low levels of reported good health. Facilities in the area are limited with the exception of SUFRA community centre and edible garden. The estate has a poor quality environment and turns its back to the Brent River Park. 	<ul style="list-style-type: none"> • Enhance the setting of and wayfinding to Neasden Temple through redevelopment of surrounding sites. • 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 to include a modern leisure centre with swimming pool.</u> MM44 • Continue planned improvements to Stonebridge Estate, including new housing and investment in open spaces, to further enhance the character of this area. • Improve life chances for those living in St Raphael’s Estate by enhancing facilities and improving the quality of the built

Challenges	Opportunities
<ul style="list-style-type: none"> • St Raphael’s and Mitchell Brook Estate feel isolated and are poorly connected to each other and the surrounding area. • Church End Town Centre demonstrates high levels of vacancy, betting shops and takeaways. • Air Quality along the North Circular is particularly poor. • Public transport accessibility levels are lower to the north. • Harlesden Overground station lacks a sense of arrival and is not well connected to the surrounding area. The same is true of Neasden which is outside this place, but could better serve the area. • Part of Wembley industrial site is occupied by Ikea and Tesco stores. The site is underutilised, poorly connected to the surrounding area and have a low quality setting. • Football pitches at Tokyngton Recreation Ground are over capacity. 	<p>environment, improving its relationship with the adjoining Brent River Park and connections to surrounding communities. Enhancements to the Brent River Park could ensure this is a better-used open space, whilst also helping to reduce flood risk.</p> <ul style="list-style-type: none"> • Plans to improve the market at Church End could be a catalyst to improve this town centre. There is also an opportunity to improve low density Locally Significant Industrial Sites and make more efficient use of land, particularly at sites in Church End which form a natural extension to the current growth area. • Old Oak is both a challenge and an opportunity particularly for Harlesden. Harlesden Town Centre needs to be promoted as distinct from Old Oak, with its cluster of multicultural independent shops and restaurants, and music scene. There is a need to work with the Old Oak and Park Royal Development Corporation to improve links between Harlesden Town Centre and Willesden Junction. There is also potential to promote Harlesden to creative businesses looking to relocate from Old Oak due to redevelopment, and potentially for designation as a Creative Enterprise Zone by the Mayor of London which recognises an area’s contribution to supporting creative activity, including artists and creative businesses. • Re-opening the Dudding Hill freight line as the West London Orbital passenger line is a key opportunity to improve

Challenges	Opportunities
	<p>accessibility to the north of this area, and reduce car reliance.</p> <ul style="list-style-type: none"> • Improve sense of arrival at Harlesden and Stonebridge Park stations. • To improve the connectivity of this area with cycle routes from this place to Wembley, Cricklewood and Old Oak. • Better utilise Wembley industrial site, enhancing the quality of environment and improving linkages to the surrounding area and enhancing access for local residents to facilities, services and employment opportunities. • Improving football pitches at Gibbons Recreation Ground will help meet demand and take pressure off Tokyington Recreation Ground.

Figure 23: High Level Plan of the Place More detailed boundaries can be seen on the Policies Map^{MiM79}

Vision

- 5.5.10 A vibrant place which celebrates its diversity and cultural assets including Neasden Temple. Harlesden will have strong links to Old Oak via Willesden Junction, but will keep its distinct identity as a place with multicultural shops, cafes and restaurants with a night time offer which celebrates its musical heritage.
- 5.5.11 The West London Orbital will improve Church End’s connectivity to London as a whole. Mixed use development will make Church End Growth Area a more attractive neighbourhood in which to live and work, focussed around a vibrant multi-cultural local centre with a thriving market.
- 5.5.12 St Raphael’s, Stonebridge and Mitchell Brook will be places which offer a high quality of life, better integrated with their surroundings and improved open spaces, built environment, community and leisure facilities.

POLICY BP5 SOUTH

Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:

Character, Heritage and Design

Strengthen local identity and character by:

- a) Conserving and enhancing heritage and cultural assets and their setting, in particular that of Neasden Temple and Harlesden Conservation Area.
- b) Positively responding to the predominantly low-rise character of the area, enhancing the local setting and having a comfortable relationship with adjacent areas, while providing a dense development pattern.
- c) There is an opportunity for some taller buildings near Wembley Point. This will be subject to buildings being of the highest design quality, and enhancing the local setting. Additional taller buildings of up to 15 metres (5 storeys) could be appropriate in the intensification corridors of A404 Harrow Road/ Brentfield/ Hillside and Craven Park, A407 High Road and A4088 Dudden Hill Lane.
- d) St Raphael's Estate is a priority area for the Council. The council will engage with the community to develop a strategy for this area as a potential area of change. To help address issues identified and deliver more homes, the council is considering options for the estate including refurbishment with limited new build and re-development, the latter of which would require a ballot.

Homes

- e) A minimum of 4,900 additional homes in the period to 2041. Church End Growth Area, providing over 1,300 new homes, 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. A minimum 797 dwellings should be provided in the Harlesden Neighbourhood Plan Area in the period to 2041.

Town Centres

- 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 towards Church End and Harlesden town centres. MM269
- i) Church End town centre will provide convenience retail for local communities, including a market.

Employment and Skills

Supporting the local economy through:

- j) Co-location of ~~employment~~ industrial and residential uses at Church End Locally Significant Industrial Sites, subject to the requirements in policy BE2.
- k) Retaining and encouraging intensification of ~~employment~~ industrial uses at Brentfield Locally Significant Industrial Site.
- 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.

Community and Cultural Facilities

- 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.**
- m) A new high quality indoor leisure facility with swimming pool provision will be secured on the Unisys Bridge Park site.**
- n) Protect playing pitch facilities at Tokyngton and Gibbons Recreation Ground.**
- o) A new 6 form of entry secondary school and college will be secured on the Chancel House site.**
- ~~p) A new space within Church End Growth Area to serve as an employment, community and health hub. 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.~~^{MM45}**

Open Space and Biodiversity

Contribute to high quality, well-used open spaces and wildlife corridors to include:

- q) Enhancements to Sherrin's Farm Open Space, Evefield Open Space, Brentfield Park, Church End Open Space and St Mary's Open Space.**
- r) Prioritise tree planting in areas with poor air quality, particularly along the North Circular Road and other transport corridors.**
- s) Reduce flood risk at Brent River Park through environmental enhancements.**

Transport

- t) Safeguard land for the West London Orbital route.**
- u) Enhance the setting of Harlesden and Stonebridge Park Stations and its connectivity to the surrounding area and Harlesden Town Centre through wayfinding and public realm enhancements.**
- v) Enhance connections to Neasden Temple through wayfinding.**
- w) Create strong links between Harlesden Town Centre and Old Oak via Willesden Junction, and from Harlesden and Stonebridge to Park Royal, through wayfinding and public realm improvements.**
- x) Enhance cycle routes from Harlesden to Cricklewood, Wembley and Old Oak.**
- y) Improve connectivity between St Raphael's Estate and the surrounding area.**

Justification

Employment land 10%, Conservation area 3%, Open space 19%

Character, Heritage and Design

5.5.13 The character of this place in its residential areas is predominantly two to three storey terraced housing. Notable exceptions include Stonebridge Housing Estate, which previously included tall buildings, but redevelopment has replaced this with housing of a more human scale including town houses and apartments on average four

storeys in height. Whilst development should respect the predominantly low rise character of the area, on larger sites over 1ha there is an opportunity to create a new character with higher density development. In addition, additional taller buildings of up to 15 metres (5 storeys) could be appropriate in the intensification corridors of A404 Harrow Road/ Brentfield/ Hillside and Craven Park, A407 High Road and A4088 Dudden Hill Lane.

- 5.5.14 Adjacent to Stonebridge Park Station is the 21 storey Wembley Point building, and the 8 storey Unisys building is situated on the opposite side of the North Circular Road. The Unisys building has been long-term vacant and is currently in a poor condition. Wembley Point is a 1970s office building. Both buildings are located at an important gateway to the borough and are highly visible from the North Circular road and by rail. It is considered a cluster of taller buildings could be appropriate in this location, subject to buildings being of a high quality design which contributes to the sense of arrival to the borough and development successfully mediating between the taller elements and the surrounding low-rise.
- 5.5.15 St Raphael's Estate experiences high levels of deprivation and a low quality environment. It is poorly connected to the surrounding area and nearby facilities including Brent River Park and retail to the north. The council will engage with the community to develop a strategy to help to address the multiple challenges faced in St Raphael's as a potential area of change. The council's existing Housing Strategy 2014-19 states that estate-based regeneration schemes such as in the St Raphael's Estate are expected to deliver new supply alongside improvement or replacement of existing stock in line with regeneration priorities. To help address issues identified and deliver more homes, the council is working collaboratively with residents in considering options for the estate including refurbishment with limited new build and re-development, the latter of which would require a ballot.

Homes

- 5.5.16 The delivery of improved housing and community centre at Stonebridge Park is to be continued. Initial phases replaced 1960s high rise housing with award-winning high quality homes, improved public open space and the Fawood Children's Centre. These developments have improved the quality of the environment and provided mixed communities with social and private housing. Further phases will include new homes, an extension to Stonebridge Primary School including enhancements to open space and new play space. Once complete the scheme will have provided 1,850 new homes including 1,100 for social rent and a new community and health centre.
- 5.5.17 The Harlesden Neighbourhood Plan produced by the Harlesden Neighbourhood Forum will guide the development of Harlesden. A key priority for the forum is to promote housing delivery, in particular affordable housing in this area. The plan contains seven proposed development sites. A key site is the Harlesden Plaza at the town centre's core. The plan proposed a mixed use scheme including retail, residential, community centre and a new public square to create a focal point. In addition to the sites identified in the neighbourhood plan, the redevelopment of sites surrounding Harlesden station could help improve this gateway and connectivity to the town centre.

Town Centres

- 5.5.18 Retail floorspace should be directed towards Harlesden district centre as the highest-order centre in the place. This will ensure it remains a resilient shopping destination able to meet local shopping needs. This is important in light of the proposed new town centre floorspace at Old Oak Common. Harlesden does not presently have a strong evening economy offer, and many residents are travelling to locations further afield. Its enhancement would retain a greater proportion of spend locally, and help diversify the offer of the town centre.
- 5.5.19 Church End serves a local catchment. Although its retail offer is currently limited, the redeveloped market will be a catalyst to improve this area.
- 5.5.20 Both are priority town centres that will be subject to action plans related to a range of issues that seek to improve their vitality and viability.

Community and Cultural Facilities

- 5.5.21 Population growth will give rise to the need for new community facilities in this area, as evidenced by the Brent Infrastructure Delivery Plan. In particular, there is a need for a new secondary school which is to be delivered on the Chancel House site in Church End. Church End as a Growth Area will experience population growth and will also have improved connectivity due to the West London Orbital, making it a preferred location for a new secondary school. Increased population will give rise to the need for a multi-use community centre and ~~health hub~~ a primary care health centre (subject to needs assessed in collaboration with the borough Clinical Commissioning Group)^{MM46} in Church End Growth Area.
- 5.5.22 Reported levels of good health are lower in this part of the borough than elsewhere. Investment in sport and leisure facilities is therefore particularly important. Redevelopment of Bridge Park to provide a new modern leisure centre will ensure this part of the borough has a better sports offer, which will have associated health benefits.

Employment and Skills

- 5.5.23 Parts of this place experience high levels of deprivation and unemployment, scoring within the country's top 10% of most deprived areas. There is therefore a real need to increase employment levels and job quality by promoting investment in employment sites. Mixed-use development will promote intensification and investment in Church End Locally Significant Industrial Sites.
- 5.5.24 Brentfield Locally Significant Industrial Site in contrast has benefitted from investment. It contains Artesian Close, a modern managed industrial estate and power station. It benefits from its proximity to Park Royal and good links to the north circular via Brentfield Road. Although some of the surrounding units are in a poor condition there is an opportunity to improve this site through intensification.
- 5.5.25 The Brent Workspace study identified existing clusters of creative industries in Harlesden, and an unmet demand for incubators, accelerators and co-working space. In addition, the redevelopment of Old Oak is an opportunity to attract displaced businesses looking to stay in the local catchment. Retaining and enhancing creative clusters will bring a number of benefits. These include improving employment opportunities, encouraging enterprise and reducing the need to travel to central London with its associated pressure on the transport network. Where redevelopment

of local employment sites is proposed, mitigation will be required in the form of new affordable workspace to meet identified need.

Open Space and Biodiversity

- 5.5.26 Generally, this place is well served by open spaces ranging in scale from district parks to pocket parks. There are however some areas that are deficient such as Church End and Willesden Green. The Keep Britain Tidy Qualitative assessment identified that whilst many of the open spaces in this place scored highly, a number are in need of improvement. To ensure this place is served by high quality open spaces, improvements should be prioritised to Brent River Park, Sherrin's Farm Open Space, Evefield Open Space, Brentfield Park, Church End Open Space and St Mary's Open Space.
- 5.5.27 Brent River Park and some existing properties in the surrounding area are located within a flood risk zone. Enhancements to the park can be designed to also help reduce flood risk.

Transport

- 5.5.28 Projected population growth will place pressure on the road network, meaning the only sustainable long term solution is to promote active and sustainable travel over private vehicle use. A key barrier to this is that orbital links here are reliant on the bus network and therefore less reliable. The West London Orbital, which will make use of the existing Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to High Speed 2 and Elizabeth Line and Old Oak and to the east Thameslink at Brent Cross West. This will significantly improve public transport accessibility levels in areas which are currently poorly served. Opportunities to allow better connectivity across the line can also be considered.
- 5.5.29 To ensure public transport is the preferred mode of travel it will be important to ensure underground stations provide good interchange facilities and are well connected to the surrounding area. At present at Harlesden and Stonebridge Park Stations this is not the case. On exiting the station there is a lack of sense of arrival; wayfinding is currently poor. Redevelopment of the surrounding area and investment in the public realm will allow the stations' relationship to the surrounding area to be significantly enhanced.
- 5.5.30 The regeneration of Old Oak, an existing industrial site to the south of Harlesden, is planned. It will deliver ~~24,000~~ 25,500 homes and ~~55,000~~ 65,000 new jobs focussed around a new High Speed 2 and Elizabeth Line interchange. ~~Intensification in Park Royal is to deliver a further 10,000 jobs and 1,500 homes.~~ The project is being led by the Old Oak Park Royal Development Corporation (OPDC). It will be important that the council continues to work with the OPDC, and Network Rail as the owners of the operational rail infrastructure, in addition to Transport for London, potential developers and community groups. This is to ensure this significant regeneration project brings the highest number of benefits for Brent residents as possible. In particular, a key priority is to improve the connectivity between Old Oak and Harlesden, now likely to focus on Old Oak Lane, in addition to ~~through~~^{MIM80} an enhanced Willesden Junction Station (including over-station development), and wayfinding. This will better ensure local residents can benefit from job opportunities

and new facilities and that Harlesden Town Centre is not adversely affected by a proposed major centre at Old Oak.

Church End Growth Area

Policy BSGA1 Church End Growth Area

Church End is promoted for mixed use regeneration set around the economic revitalisation of the local centre and an outdoor market square, using the highest standards of urban design to physically improve the area and change the perception to a busy, thriving, safe and secure neighbourhood. The town centre's southern parade will be enhanced and historic features restored, whilst more comprehensive development to the northern parade and car park will deliver a new market facility, community and commercial space and housing.

The redevelopment of industrial sites for co-location will secure investment in new employment/industrial floorspace and improve environmental quality.

New open spaces and outdoor recreation facilities will be supported by high quality landscaping, tree planting and public realm strategy to reduce the impact of vehicular movement and prioritise pedestrians and cyclists. Wayfinding and public realm enhancements will improve pedestrian links to Neasden Station.

The West London Orbital will improve the connectivity of Church End to the wider borough and Central London.

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

- **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**
- **Increased greening through tree planting and the creation of new open space within site allocations.** MM47

5.5.31 Church End is an existing Growth Area identified for new homes, community facilities and a new outdoor market. Planning permission has already been granted for a new market, retail space and approximately 100 homes to the rear of Church End local centre. Whilst 47 homes have been delivered on land to the east of St Mary's Vicarage.

5.5.32 The West London Orbital will further improve the connectivity of this area making it a desirable location to live and work. There is an opportunity to extend the Growth Area boundary to include nearby low density employment-industrial sites to promote investment in these areas. Church End Locally Significant Industrial Sites are low density employment-industrial sites, which also contain uses including retail. These sites have experienced limited investment and in places have a low quality environment. Intensifying these areas through mixed-use development will encourage investment whereby residential development can support the provision of modern workspace to help meet the borough's need for incubators, accelerators and co-working space. The West London Orbital route will greatly increase public

transport accessibility levels in this location, further supporting the need for higher density development on these sites. In advance of adoption of a Church End masterplan supplementary planning document which will seek comprehensive solutions for these ~~employment industrial~~^{MiM81} areas, small scale release of sites will be resisted.

- 5.5.33 The town centre has been designated as secondary frontage. This will allow the centre to provide a more diverse and better quality offer, including restaurants and cafes, to serve the local catchment. There is also scope for community space and small scale employment uses. The southern parade of the centre retains many original features. The focus will be on restoring these features and replacing shopfronts to create a uniform character. There may be potential for some residential development above the shops, for example through sympathetic dormer extensions. The northern parade is in a poorer condition and in need of significant investment. This area has been identified for more comprehensive redevelopment.
- 5.5.34 Whilst the location of the secondary school is fixed the location of additional infrastructure will be identified through the Church End masterplan. With the exception of the Afghan Community Centre there is a lack of community space in Church End. A new space to serve as ~~an employment~~, a workspace, multi-use community centre, and ~~health hub a primary care health centre~~^{MiM82} will help promote community cohesion. Access to open space is limited with the exception of Church End and Neasden Open Space. Under policy BGI1 new major development will be required to provide open space on site and provide a high level of urban greening. This will help to enhance the character of the area and provide further opportunities for recreation. Willesden Jewish Cemetery has benefited from Heritage Lottery Funding which will allow the creation of a visitor centre, which will better promote this important cultural asset in the area.

Key Site Allocations

Church End Growth Area

Argenta House

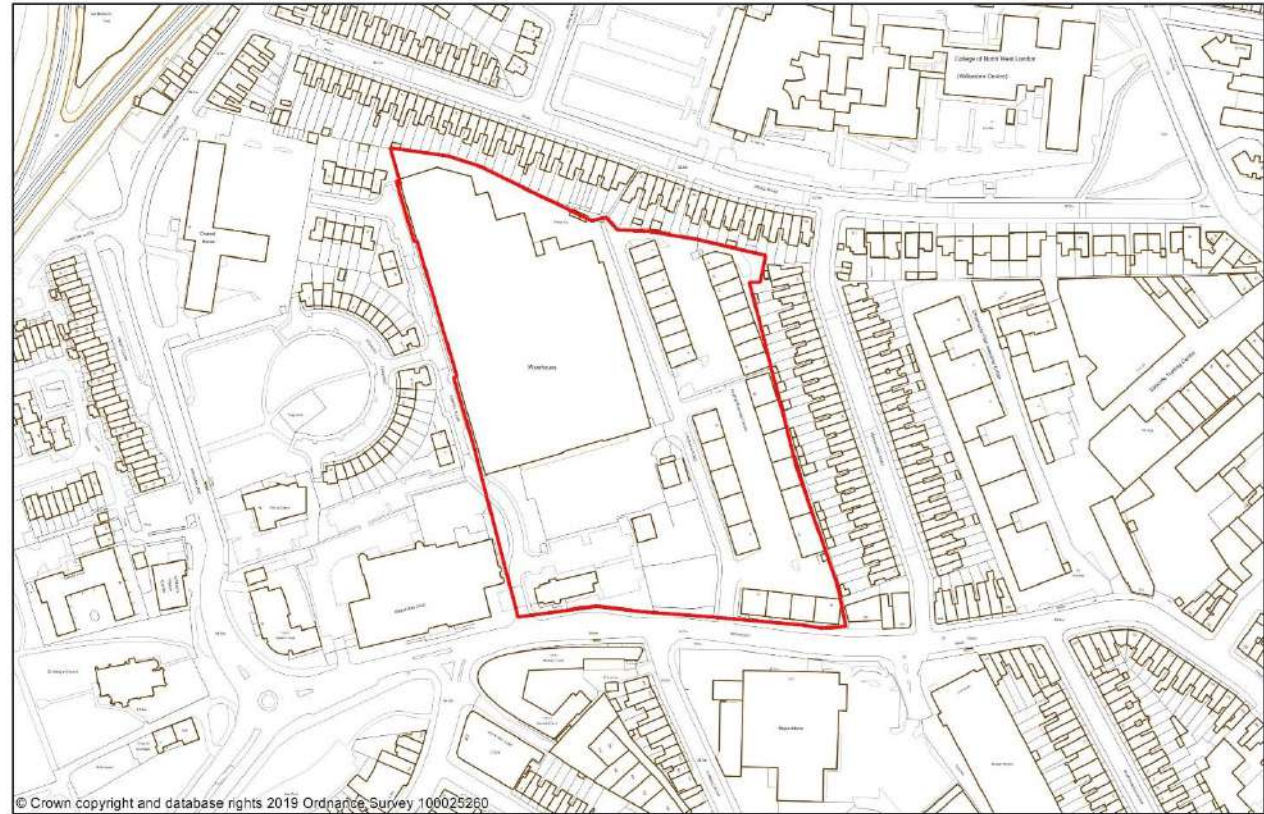
Unisys & Bridge Park

Relevant Policy Documents

- Harlesden Neighbourhood Plan

POLICY BSSA1 ASIATIC CARPETS

Site Plan



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1:2500

27 June
2019

0 0.05 0.1 kilometres



Existing Use	Offices, warehouse and workshops
Allocated Use	Mixed-use residential, employment industrial and supporting community facilities

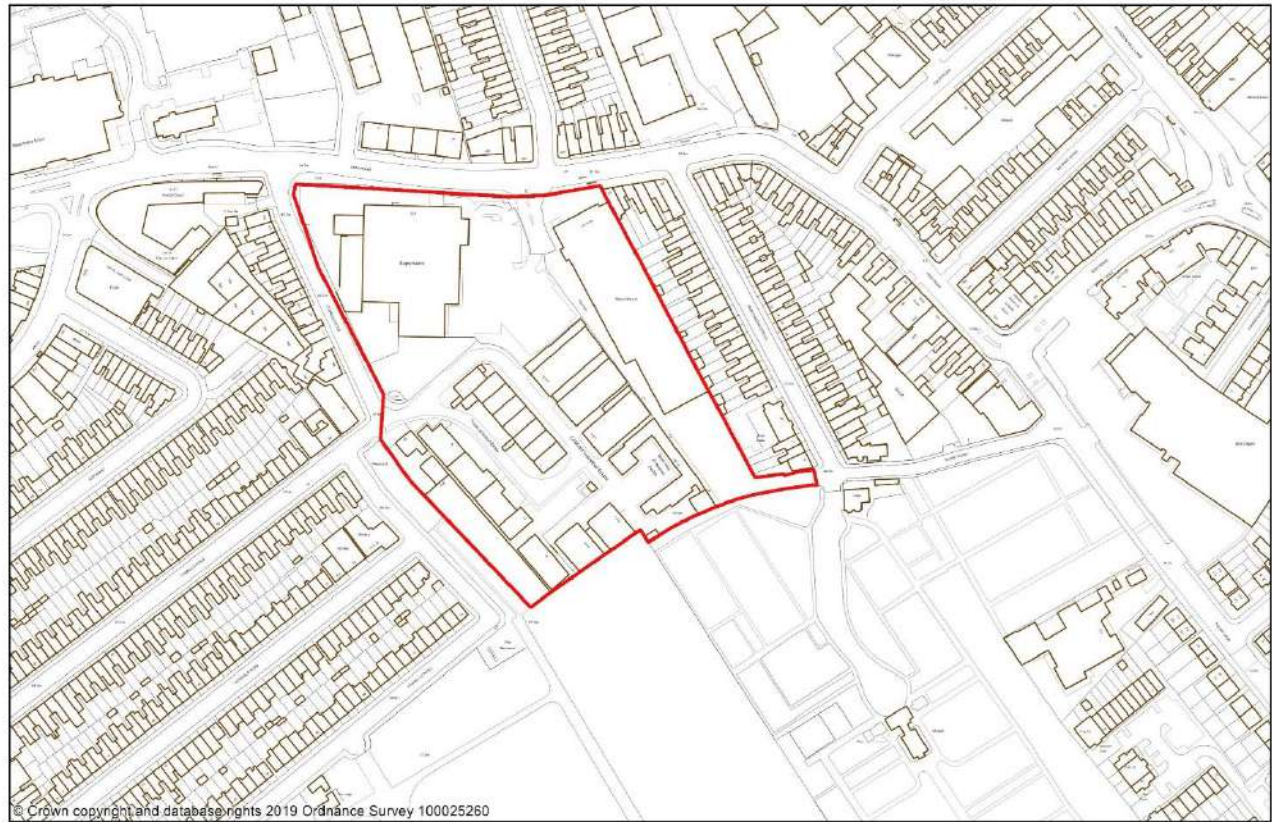
Indicative Capacity	380414		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	34	120	380260
Address	High Road, NW10 2DA		
Area	3.5 ha		
Description of Existing Site	The site contains a large three storey warehouse, a three storey office building and Cygnus business park which comprises smaller one to two storey industrial units. There are large areas of underutilised space and storage. To the north and east the site is bounded by two storey terraced housing; the south modern apartment blocks and a large format retail unit and to the west residential and the magistrates court.		
Ownership	Private		
Planning History	Cygnus Business Centre 29, 30 and 31 Prior approval change of office use to residential (18/2278)		
PTAL Rating	3/4 3-4 (current and 2031 estimate). West London Orbital could uplift by 1.		
Planning Considerations	<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 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, and from the LSIS a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater. 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. 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. 		

	<ul style="list-style-type: none"> • 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 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. • 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, <u>giving the potential for car free development</u>. The closest station is Neasden Station less than 400m away, and regular bus services stop on the site boundary. • 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.
Risks	Impact on businesses. Prior approval changes of use prejudicing a comprehensive development.
Design Principles	<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 <u>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.</u>

	<ul style="list-style-type: none"> • Development should on its edges successfully relate to the scale of existing residential development to the north and west, <u>with a setback and active frontage introduced to the west facing Chapel Close.</u> • withAppropriate heights and density will be determined through a masterplanning exercise. <p>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.</p> <ul style="list-style-type: none"> • 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.
Infrastructure Requirements	<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.
Justification	<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. ^{MM48}

POLICY BSSA2: B&M HOME STORE & COBBOLD INDUSTRIAL ESTATE

Site Plan



1:2500

27 June
2019

0 0.05 0.1 kilometres



Brent

Existing Use

Retail, employment and housing

Allocated Use

Housing, ~~employment~~ industrial and supporting community facilities

Indicative Capacity	160		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
			160
Address	Cobbold Road, NW10 9ST		
Area	3 ha		
Description of Existing Site	The site comprises a large retail unit and expanse of car parking. The 6 storey Moran House has been converted to housing with ground floor commercial. To the rear Cobbold Industrial Estate and Trojan Business Centre comprises predominantly one storey industrial units suitable for small businesses, with a number of larger three storey industrial units to the rear. To the east and west the site is bounded by two storey terraced housing; to the south the Grade II listed Willesden Jewish Cemetery and to the north the High Road and industrial uses.		
Ownership	Public/Private.		
Planning History	Prior approval: Moran House, office to residential (14/3519)		
PTAL Rating	2/42-4 (current and 2031 estimate). West London Orbital could uplift by 1		
Planning Considerations	<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. <u>This will demonstrate 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.</u> • <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. 		

	<ul style="list-style-type: none"> • 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. • 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, <u>giving the potential for car free development</u>. 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.
Risks	High value retail site might impact redevelopment viability for non-retail uses. Impact on businesses. Multiple ownership.
Design Principles	<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 <u>Demonstration of high quality of design and amenity, and</u> 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.

	<ul style="list-style-type: none"> • The development currently presents a blank wall along Cobbold Road. To be sensitive to the adjoining housing, development should be set back from Cobbold Road and provide an active frontage. • <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>
Infrastructure Requirements	<ul style="list-style-type: none"> • The location of the <u>primary health 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 creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process.
Justification	<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, and BE2. ^{MM49}

POLICY BSSA3: CHURCH END LOCAL CENTRE

Site Plan



1:1500

27 June
2019

0 0.025 0.05 kilometres



Existing Use

Commercial, car park, community uses and housing

Allocated Use

Commercial, new market and housing

Indicative Capacity	195		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	99		96
Address	Church Road, NW10 2ET9NP		
Area	0.97 ha		
Description of Existing Site	The site comprises the northern section of Church End local centre. The parade comprises commercial and community uses with residential above and car parking to the rear. A number of the buildings are vacant and show signs of disrepair. A road separates the site from St Mary's Church, Church End open space and the Magistrates' Court to the north.		
Ownership	Public/Private		
Planning History	Permission 34 residential units and a new market 205 Church Road and Eric Road (13/1098) Permission 65 residential and retail 205 – 235 Church Road (13/2213)		
PTAL Rating	2/3 2-3 (current and 2031 estimate). West London Orbital could uplift by 1		
Planning Considerations	<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 through SuDS. <u>A Flood Risk Assessment and appropriate mitigation will be required.</u> 		

	<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. • 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.
Risks	Impact on businesses. Multiple ownership.
Design Principles	<ul style="list-style-type: none"> • Development should create an active frontage on to Church Road. • Building heights should complement the southern parade which is predominantly 3 storeys in height <u>and adjacent developments such as Canaletto Court which is 6 storeys.</u> 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 <u>there and elsewhere through measures such as reducing surface water through SuDS.</u> • 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 <u>Grade II listed</u> St Mary's Church and the associated locally listed buildings.
Infrastructure Requirements	<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.
Justification	<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.

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| | <ul style="list-style-type: none">• Currently the site is underutilised, and given its accessibility it is a sustainable location for higher density development. ^{MM50}• A new market, commercial space and housing will help to revitalise the centre, as will environmental improvement. |
|--|--|

POLICY BSSA4: CHAPMAN'S AND SAPCOTE INDUSTRIAL ESTATE

Site Plan



1:2000

07 May
2019

0 0.025 0.05 kilometres



Existing Use

Warehouse and workshops

Allocated Use	Mixed-use housing, employment industrial and supporting community facilities		
Indicative Capacity	200 300		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
		<u>200</u>	200 100
Address	High Road, NW10 2DH		
Area	3.14ha		
Description of Existing Site	The site can be broadly broken down into four areas. MP Moran & Sons which is open storage and a one storey building, currently in a poor condition. Sapcote Trading estate to the east which comprises one storey units largely occupied by vehicle repair premises. One storey garages fronting Colin Road in a range of sizes. Chapman's Estate to the west comprises larger industrial units largely in use as wholesalers. To the north the site is bounded by two storey terraced housing with large gardens; to the west and south two storey terraces; and to the east commercial uses along Dudden Hill Lane.		
Ownership	Private		
Planning History	None relevant		
PTAL Rating	4/- 5 (current and 2031 estimate)		
Planning Considerations	<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 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. 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.</u> • <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> 		

	<ul style="list-style-type: none"> • The site itself comprises includes expanses of impermeable surfaces and lacks soft 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. • 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 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.
Risks	Impact on businesses. Multiple ownership.
Design Principles	<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 <u>Demonstration of</u> high quality of design and <u>amenity</u>, 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 <u>consider</u> be sensitive to impacting on the amenity of surrounding <u>2-storey</u> 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 <u>an active frontages to Colin Road and Dudden Hill Lane.</u> • Development should increase soft landscaping and increase tree planting along Dudden Hill Lane.
Infrastructure Requirements	<ul style="list-style-type: none"> • The location of the <u>primary health care centre</u>, community <u>centre</u> and <u>workspace</u> as set out in <u>BSGA1</u> will be determined through the masterplanning exercise.

	<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. 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.
Justification	<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. • 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, and BE2. ^{MM51}

POLICY BSSA5: WILLEDEN BUS DEPOT

Site Plan



1:1500

07 May
2019

0 0.025 0.05 kilometres




Existing Use	Transport for London Bus Depot and vacant public house		
Allocated Use	Re-provision of bus depot and public house or employment <u>industrial</u> uses with residential above.		
Indicative Capacity	60		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
		30	30
Address	Willesden Bus Depot, High Road, Willesden Green, NW10 2JY		
Area	1 ha		
Description of Existing Site	<p>The site comprises a Transport for London Bus Depot and the long-term vacant Crown Public House. To the north and east the site is bounded by buildings ranging from two to four storeys in height. These comprise residential units with commercial ground floor uses fronting Willesden High Road. Willesden Jewish Cemetery is located to the west of the site, and to the south a terrace of two storey housing.</p> <p>The site adjoins a warehouse and buildings with permission for mixed-use residential and commercial development.</p>		
Ownership	Public/Private		
Planning History	There is no relevant planning history for the bus depot itself, but the adjoining warehouse and units have planning permission for redevelopment. Prior approval granted to convert adjoining warehouse on 291 High Road to residential. (16/2689). Planning permission for residential with commercial unit at ground floor on 295-197 High Road. (12/1685)		
PTAL Rating	5 to 6 (current and 2031 estimate)		
Planning Considerations	<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. 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). 		

	<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 <u>employment-light industrial maker</u> 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. <u>The site has high PTAL which means development should be car free.</u> 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. • As with the majority of Brent the site is located w <u>Within an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive.</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. • 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.
Risks	<ul style="list-style-type: none"> • The operational requirements of the bus depot are a risk to the delivery of the site. • Construction works will need to be carefully co-ordinated with Transport for London.
Design Principles	<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 successfully relate to the scale of existing <u>adjacent</u> 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 potential conflicts between uses can be mitigated</u> • 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 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.</u>

	<ul style="list-style-type: none"> • 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. • Tree planting along the northern and eastern boundary of the site should be retained and reinforced.
Infrastructure Requirements	<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>
Justification	<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 residential and a re-provided bus depot <u>or a range of industrial uses.</u> ^{MM52} • Crown Public House is a long-term vacant building which is in a poor state of repair and detracts from the streetscene.

POLICY BSSA6: ARGENTA HOUSE & WEMBLEY POINT

<p>Site Plan</p>	 <p>© Crown copyright and database rights 2019 Ordnance Survey 100025260</p> <p>1:1500</p> <p>27 June 2019</p> <p>0 0.025 0.05 kilometres</p> <p>Brent</p>
<p>Existing Use</p>	<p>Light industrial, food and drink kiosk and office with prior approval to convert to residential</p>
<p>Allocated Use</p>	<p>Residential, <u>with potential</u> for affordable workspace, supporting community and cultural uses and small scale retail.</p>

Indicative Capacity	540569		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	440569	100	
Address	Argenta Way, NW10 0AZ		
Area	1.2 ha		
Description of Existing Site	<p>The site is occupied by a two storey light industrial building, which houses a silversmith and kiosk selling food and drink, and the Wembley Point building with prior approval for conversion to residential. The Wembley Point building is a 21 storey building set within a large area of car parking. Wembley Brook intersects the site. The brook is in a concrete channel which connects to the River Brent via a culvert. To the north the site is bounded by two storey housing; to the east Harrow Road; to the south the North Circular Road; and to the west Stonebridge Park Station and associated railway lines.</p>		
Ownership	Private		
Planning History	<p>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 to clad Wembley Point. (18/4535 & 17/3244) Planning permission application to develop 130 residential units on Argenta House site. (18/4847)</p>		
PTAL Rating	4 (current and 2031 estimate)		
Planning Considerations	<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 including extensive 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 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.

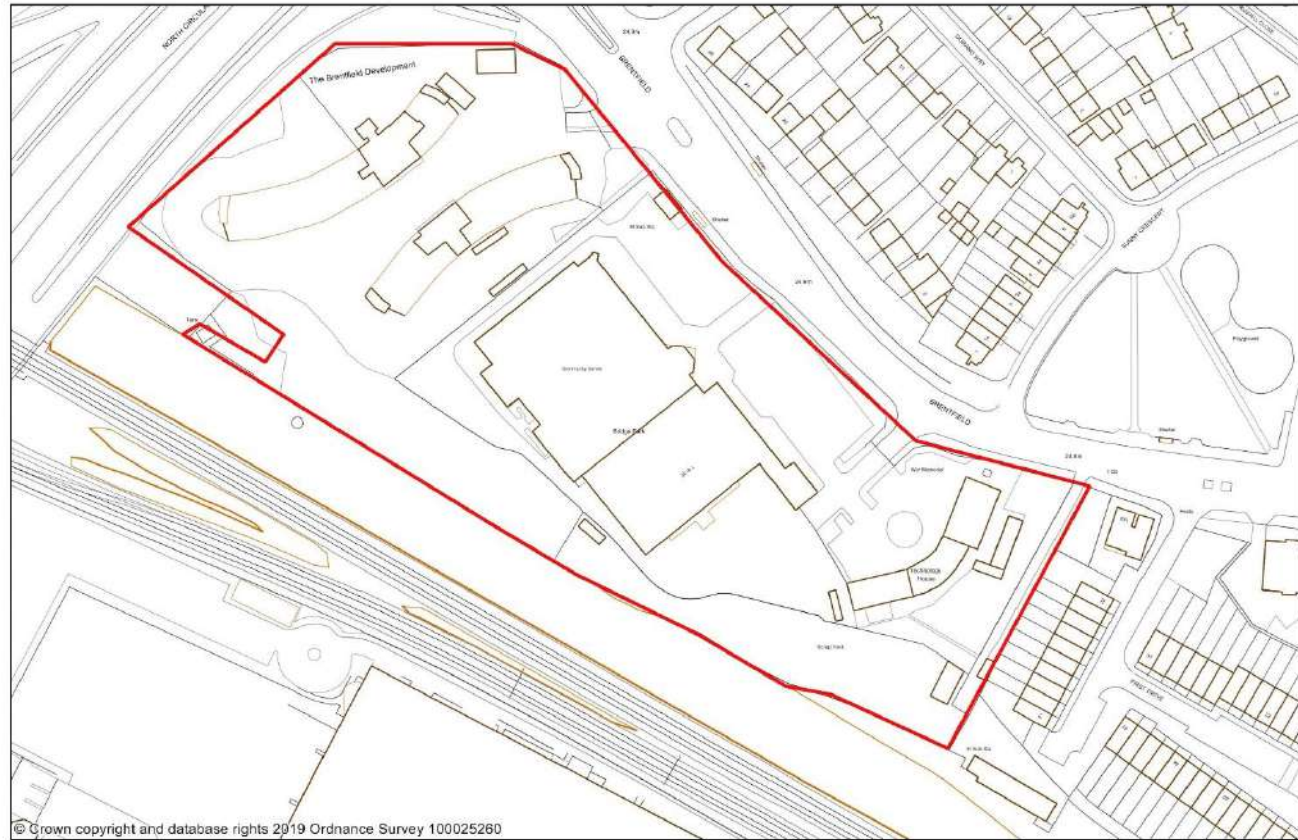
- ~~The area is heavily built up. Lack of landscaping, large expanses of car parking and the North Circular Road contribute to low permeability and accumulated surface water build up.~~
- The railway trackside and Wembley Brook adjacent the site forms part of a wildlife corridor and Grade I Site of Importance 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 should be the starting point for development will be encouraged, subject to a Controlled Parking Zone being achieved.
- 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 was until recently predominantly in employment use contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit. The London Plan identifies Brent as a 'provide capacity' borough in terms of industrial employment floorspace and as As such an increase in provision of some employment floorspace affordable workspace will be sought on site, as part of the potential uses associated with a new mixed use community.~~
- ~~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 nearby parade at Harrow Road. 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 improved, subject to agreement being reached between the Council and landowners.
- Site is of sufficient size to incorporate BH3 Build to Rent and BH8 Specialist Older People's Housing policy requirements.

Risks	Flood risk.
Design Principles	<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 <u>Therefore</u>, the highest architectural quality will be required. • Development must mediate, in scale and layout, between the A-cluster of taller buildings is located in this location, including the 7 storey Unisys buildings and 21 storey Wembley Point building, and the <u>However, to the north the site is bounded by two-storey housing 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 is suitable for tall buildings, subject to</u> achieving development integration <u>ng well</u> • 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 <u>whilst also providing sustainable urban drainage.</u> • 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 active frontage and public realm enhancements. • 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.
Infrastructure Requirements	<ul style="list-style-type: none"> • Flood mitigation. • Improvements of the public realm/ interchange facilities at Stonebridge Park station and step-free access.

	<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>
Justification	<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. • 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 re-provision 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 <u>as part of any development</u>, 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. ^{MM53}

POLICY BSSA7: Bridge Park & Unisys Building

Site Plan



1:1500

07 May
2019

0 0.025 0.05 kilometres



Existing Use

Leisure centre, vacant office buildings, community and commercial uses.

Allocated Use	New leisure centre, hotel, office, residential and small scale commercial and community uses.		
Indicative Capacity	505		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
		275	230
Address	Brentfield, Stonebridge, London, NW10 0RG.		
Area	2.7 ha		
Description of Existing Site	Bounded on the north by Brentfield Road, the east by residential units, south by railway tracks and the west by the North Circular Road. The site is occupied by the Bridge Park Community Leisure Centre, the vacant Unisys buildings, offices, a nursery and religious venue and car parking. The Unisys buildings were once office blocks but have been vacant for around 17 years. The leisure centre, constructed in the 1980s is in need of modernising. There is also a car breakers site in the southern most corner of the site which contributes to the site's neglected feel.		
Ownership	Leisure centre and nursery are public; the rest is private.		
Planning History	None relevant		
PTAL Rating	PTAL 3 and 4 (current and 2031 estimate)		
Planning Considerations	<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 perimeter of the leisure centre's car park, all of which should be retained if possible. • As with the majority of Brent the site is 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 testing should be undertaken along with any necessary remediation works. 		

	<ul style="list-style-type: none"> • The whole 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 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 numerous industrial areas all contributing to low permeability, and accumulated surface water build up. • 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 <u>3-4 4/3</u>, 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.
Risks	<ul style="list-style-type: none"> • Procurement of car breakers site and need to manage relocation of businesses during redevelopment. • Flood risk.
Design Principles	<p>A cluster of taller buildings is located on the western edge of the site, including the 8 storey Unisys buildings and, on the other 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.

	<ul style="list-style-type: none"> • The layout of development must 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 should be enhanced, increasing greenery, and in the process, permeability whilst reducing risk of flooding.
Infrastructure Requirements	<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> • 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.
Justification	<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 <u>In its current state the site is of a poor environmental quality, with dated buildings and the long-term vacant Unisys buildings.</u> • It contrasts with the attractive environment created elsewhere in Stonebridge through modern development. MM54 • Redevelopment would improve the environmental quality of the area and create an attractive gateway to the borough and Stonebridge. • 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.

OTHER ALLOCATIONS

Ref.	Site name	Address	Size (ha)	Existing Use	Allocated Use	Indicative housing capacity	Comments
BSSA8	McGovern's Yard	25 Colin Road, London, NW10 2EE	0.4	Light industry	Residential and employment <u>industrial</u>	50	Consistent with policy BE3 an increase in employment <u>the maximum viable amount of industrial</u> floorspace will be sought as part of any redevelopment. MM55
BSSA9	Barry's Garage	1 Glebe Road, London NW10 2JD	0.4	Vehicle repair garage, commercial uses, residential, church, nursery	Residential, workspace and community space	40	Consistent with policy BE3 an increase in employment <u>the maximum viable amount of industrial</u> floorspace will be sought as part of any redevelopment.

							MM55 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 necessary. The retention of the Willesden Seventh-Day Adventist Church building and the former constitutional club is encouraged.
BSSA10	Dudden Hill Community Centre	Dudden Hill Centre, 19 Dudden Hill Lane, London, NW10 2ET	0.17	Community hall, redundant games court, playground	Housing, re-provision of community centre	25	To mitigate for the loss of the former games court and playground contributions will be required to provide compensatory games court and playground

							provision at Longstone Avenue Open Space.
BSSA11	Euro Car Rental	Vanguard Rental, 101 Brentfield Road, London, NW10 8LD	0.5	Car rental	Housing	25	Development must reflect the predominantly low rise character of the area and respect the setting of Neasden Temple. Development should be set back from the road to protect views to the temple from Brentfield Road and the surrounding area. The canal is important for wildlife and therefore attempts to enhance and incorporate nature into the development will be encouraged.

BSSA12	296-300 High Road	296-300 High Road, Willesden, NW10 2EN	0.09	Commercial, community, public space containing artwork	Mixed-use	8	Public square and artwork to be retained and enhanced
BSSA13	Learie Constantine Centre	43-47 Dudden Hill Lane, London, NW10 2ET	0.03	Community	Mixed-use	1526 ^{MM55}	Community centre to be re-provided
BSSA14	Morland Gardens	Morland Gardens, NW10 8DY	0.3	College	Residential	60	
BSSA15	Harlesden Station Junction	128 Acton Lane, NW10 8UP	0.06	Commercial	Mixed-use residential and commercial. Potential for self or custom-build	3	Enhance the setting of Harlesden Station and improve connectivity to Harlesden Town Centre
BSSA16	Mordaunt Road	Mordaunt Road, NW10 8NU	0.1	Commercial and residential	Mixed-use residential and commercial. Potential for self or custom-build	8	Enhance the setting of Harlesden Station and improve connectivity to Harlesden Town Centre
BSSA17	Harlesden Railway Generation Station	Acton Lane, NW10 8UR	0.21	Workspace and substation	Workspace	0	Enhance the setting of Harlesden Station and improve

							connectivity to Harlesden Town Centre
BSSA18	Harlesden Telephone Exchange	Avenue Road, NW10 4UG	0.39	Telephone Exchange building	Mixed-use residential and commercial	52	This site is immediately adjacent to the Grade II* Church of All Souls and the Harlesden conservation area. The presence of these heritage assets should be clearly indicated and the assessment of any effects on their significance (including on their setting) will be required. The Harlesden Conservation Area Character Appraisal provides further information on these heritage assets.

BSSA19	Chancel House	Chancel House, Neasden Lane, NW10 2UF	0.8	Offices	6FE Secondary School	0	
	Harley Road	Harley Road, NW10 8BB	0.08	Signal Station	Residential. Potential for self or custom-build	7	See Harlesden Neighbourhood Plan
	Car sales at junction of High Street and Furness Road	Furness Road, NW10 4TE	0.08	Commercial	Residential. Potential for self or custom-build	5	See Harlesden Neighbourhood Plan
	Former Willesden Ambulance Station	164 Harlesden Road, NW10 3SF	0.07	Vacant	Residential. Potential for self or custom-build	8	See Harlesden Neighbourhood Plan
	Land at Challenge Close	50-70 Craven Park Road, NW10 4AE	0.19	Commercial	Residential. Potential for self or custom-build	10	See Harlesden Neighbourhood Plan
	Salvation Army & Manor Park Works	Manor Park Road, NW10 4JJ	0.19	Warehouse and Community Space	Residential	45	See Harlesden Neighbourhood Plan. Permission granted 17/2331
	Harlesden Plaza	Tavistock Road, NW10 4NG	0.9	Retail and car parking	Residential	208	See Harlesden Neighbourhood Plan

5 Places

5.6 South East Place

5.6.1 This place includes the wards of Brondesbury Park, Kilburn, Mapesbury, Queen's Park and parts of Kensal Green and Willesden Green. To the east it is bounded by the A5 road which follows the route of the old Roman Road into Central London. The neighbourhoods of Maida Vale and West Hampstead form the boundary to the south, Roundwood Park and Harlesden to the west, and the Dudding Hill Freight line to the north.

Character and Culture

5.6.2 The South East Place comprises largely residential neighbourhoods focussed around town centres, and with eight conservation areas has a strong sense of character. To the south Brondesbury, Queen's Park, Willesden and Kilburn are characterised by Victorian terraces. Further north Cricklewood and Mapesbury are characterised by suburban houses with large gardens and turn of the century town houses. In contrast South Kilburn Estate is an area in transition, and comprises a mix of 1960/70s residential concrete towers and contemporary apartments.

5.6.3 There are many notable cultural and heritage assets including the Kiln Theatre (formerly known as Tricycle Theatre) in Kilburn, which has transferred multiple productions to the West End; the Lexi independent cinema; the Grade II listed Tin Tabernacle originally built in 1863 as a church, formerly home to the Sea Cadets and now a community venue; and the Gaumont State Cinema a Grade II* listed Art Deco building which when first built was one of the largest cinemas in Europe; The Granville Centre and South Kilburn Studios which provide community and workspace; Queen's Park which was opened by the Lord Mayor of London in 1887; and Willesden Green Library a modern library which includes performance, community and exhibition space and is home to Brent Museum.

Town Centres

5.6.4 This place benefits from good access to shops and services. Queen's Park, Willesden Green and Kensal Rise are characterised by independent shops, cafes and restaurants. Cricklewood and Kilburn High Road have an offer which reflects their diverse communities, with restaurants serving food from all around the world. Kilburn High Road has a lively night time offer including restaurants, the Kiln Theatre and cinema, and performance and entertainment venues in its pubs.

Employment and Education

5.6.5 Although there are no designated ~~employment~~ industrial sites here, there is a strong entrepreneurial culture with the highest proportion of micro businesses (with less than 9 employees), home working and self-employment in the borough. Creative

businesses are clustered in Queen’s Park ~~Creative Quarter~~ on Lonsdale Avenue Road^{MiM83}, Kilburn High Road and increasingly at Willesden Green. Employment is concentrated in ICT, media, creative services, professional and financial services.

Open Space and Biodiversity

5.6.6 Significant open spaces include Queen’s Park, Paddington Cemetery, part of Gladstone Park Metropolitan Open Land, Kilburn Park and the recently completed Woodhouse Park. Smaller open spaces and pocket parks, such as Mapesbury Dell, Tiverton Green and Rainbow Park are also distributed across this place. Cricket, football and rugby sports pitches are concentrated at Gladstone Park and Willesden Sport Centre adjoining King Edward Recreation Ground.

Transport

5.6.7 This area has long been a convenient commuter location for central London. Railway stations first opened in Kilburn and Brondesbury in the mid-1800s, followed by the Metropolitan Railway in the late 1800s. Today it is served by the Metropolitan Line, Bakerloo Line, London Overground and the Jubilee Line, which is now part of the night tube.

5.6.8 The London Overground travels through this place providing an orbital route^{MiM84} linking Richmond/Clapham Junction and Stratford, stopping at Willesden Junction, Kensal Rise, Brondesbury Park and Brondesbury. Orbital travel further north in this place is reliant on the bus network, which due to road congestion is less reliable. In particular, the A5 is a congested route into central London.

5.6.9 The majority of cycle and walking routes in this place are on road. The recently completed cycle route 3 connects Gladstone Park to Regent’s Park via Willesden and Kilburn. Brent’s first segregated cycle route has also been introduced in the South Kilburn Growth Area. The Brent Long Term Transport Strategy identifies the potential to improve cycle connections within this place with additional routes from Kilburn and Kensal Rise to Church End via Willesden Green.

Challenges	Opportunities
<ul style="list-style-type: none"> • Although generally a relatively affluent place there are areas of deprivation particularly in South Kilburn, parts of which in 2015 were in the top 10% of the most deprived areas in the country. Linked to this parts of Kilburn experience amongst the lowest levels of reported good health in the borough. 	<ul style="list-style-type: none"> • Continue the regeneration of South Kilburn Estate to create an environment which provides for a better quality of life and provides additional homes. • Kilburn Town Centre is well performing with a strong convenience retail goods offer. It has scope to improve its comparison retail offer. The night tube could be a catalyst to further

Challenges	Opportunities
<ul style="list-style-type: none"> • Whilst the east of Willesden Green Town Centre is performing well the west towards Dollis Hill Station experiences high levels of vacancy and a low quality environment. • The Brent Cross extension could impact on trade to Kilburn and Cricklewood Town Centres. • Although generally well served by high quality open spaces there are areas of open space deficiency to the north of this place. • Orbital transport links in the north of this place are reliant on buses and therefore less reliable. • High volumes of traffic on the A5 impact on the quality of the environment, including air quality and noise and public realm. • Hassop Road to the rear of Cricklewood Town Centre contains a concentration of vehicle repair centres, which impact on the amenity of neighbouring residential units. • Some of the playing pitches at Gladstone Park are in need of improvement. 	<p>enhance Kilburn’s existing night time and cultural offer.</p> <ul style="list-style-type: none"> • Cricklewood, Queen’s Park and Kensal Rise Town Centres provide convenience retail and a restaurant offer which could be further enhanced. • The quality of environment to the west of Willesden Green Town Centre could be improved through redevelopment. • Support and enhance clusters of creative industries in Queen’s Park, Willesden Green and Kilburn to establish Creative Quarters and help meet demand for incubators, accelerators and co-working space. Consider the potential for these clusters to be future Creative Enterprise Zones, a designation by the Mayor of London which recognises an area’s contribution to supporting creative activity, including artists and creative businesses. <u>Supporting research into a ‘Creative Cluster’ and possible establishment of a Creative Enterprise Zone within Queen’s Park, Willesden Green and Kilburn, in accordance with London Plan policy HC5 ‘Supporting London’s Culture and Creative Industries’.</u> MiM86 • Open spaces could be enhanced using Community Infrastructure Levy and other sources of funding to help address deficiency. • Creation of a West London Orbital passenger route on the Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to the proposed Brent Cross <u>West</u>

Challenges	Opportunities
	<p data-bbox="901 248 1382 322">Thameslink station (Midland Main Line). ^{MiM87}</p> <ul style="list-style-type: none"> <li data-bbox="855 338 1374 562">• Ensure development supports public realm improvements along the A5 to reduce traffic dominance and enhances this important gateway into the borough and Central London. <li data-bbox="855 573 1374 797">• The proposed Kensal Canalside development of 3,500 new homes and other uses in the adjacent Royal Borough of Kensington and Chelsea lies to the south of this Place ^{MiM88}

Figure 26 High Level Plan of the Place More detailed boundaries can be seen on the Policies Map ^{MiM89}

Vision

5.6.10 A place which celebrates its historic character and cultural attractions, where creative industries can flourish. A series of attractive green neighbourhoods focussed around vibrant town centres of Cricklewood, Queen’s Park, Willesden Green and Kilburn. Kilburn Town Centre will be a bustling night time destination, with a new market square where the community can come together. South Kilburn Growth Area’s transformation will continue to create a mixed neighbourhood with affordable housing, good access to services, new community space, an enterprise hub and high quality open spaces.

POLICY BP6 SOUTH EAST

Proposals should plan positively to deliver the place vision by contributing to and where appropriate delivering the following:

Character, Heritage and Design

Strengthen local identity and character by:

- a) **Conserving and enhancing heritage assets.**
- b) **The character of the A5 corridor will be enhanced and the Victorian terraces which characterise Cricklewood Town Centre protected. Redevelopment of infill sites currently not in keeping with the character of the terraces will be supported where development is consistent with the building line and proportions of adjoining predominantly 3 storey buildings and of a height and high quality which complements local character.**

- c) Tall buildings will only be appropriate within this place in South Kilburn Growth Area, where consistent with the South Kilburn Masterplan. In intensification corridors of A407 High Road and A4003 Willesden Lane denser development could be appropriate.

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.
- di) Deliver a minimum of 348 new homes in the Kilburn Neighbourhood Forum area in the period to 2041.
- e) Kilburn Square as part of a mixed-use development including re-provision of the market and a new public square
- f) The comprehensive redevelopment of Cricklewood Broadway Retail Park for mixed-use development including residential will be supported.
- g) Redevelopment of identified sites in Cricklewood and Willesden Green Town centres will be supported where development is of a high design quality and makes a positive contribution to the character of the conservation area.
- h) Diversification to uses including residential and employment on the intensification corridor to the west of Willesden Green Town Centre will be encouraged with further residential supported along other intensification corridors.

Town Centres

- i) Enhance and protect Kilburn Town Centre's evening economy and comparison retail offer, including the creation of a food and drink cluster 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.
- 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) Enhance and protect playing pitches fields at Gladstone Park and leisure provision at Willesden Green Sports Centre.**
- li) Promoting increased cultural and community use of the Gaumont State Cinema.**

Employment and Skills

Supporting the local economy by:

- 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^{MM56} uses which improve amenity for neighbouring residential units will be supported.**

Open Space and Biodiversity

Contribute to high quality, well-used open spaces and wildlife corridors to include:

- q) Enhancements to South Kilburn, Chapter Road, Aylestone Avenue and Rainbow Park open spaces**
- r) The creation of new pocket parks in South Kilburn Growth Area.**
- s) Protecting and enhancing existing wildlife corridors.**
- t) Delivering tree planting focussed along the A5 corridor and South Kilburn Growth Area.**

Transport

- u) Safeguard land for the West London Orbital route.**
- v) Create a high quality pedestrian connection from Brent Cross West Thameslink station to Staples Corner and the wider area.**
- w) Reduce traffic dominance and enhancing the A5 corridor through public realm improvements to healthy streets standards.**
- x) Enhance cycle links from Kensal Rise and Kilburn to Church End via Willesden Green, and from Harlesden to Cricklewood.**

Character, Heritage and Design

- 5.6.11 The council is undertaking a review of conservation area boundaries and producing Conservation Area Design Guides. The proposed extension to the Mapesbury, Kensal Green, Queen's Park, Brondesbury, Kilburn and Willesden Green Conservation Areas, plus potential new ones for Kensal Rise, Kilburn Lane and Malvern Road ~~boundary to include parts of Cricklewood Town Centre~~ reflects^{MiM90} the distinct and special character of these areas as outlined in the Brent Heritage Study. This will ensure that future development contributes positively to the character of these areas.
- 5.6.12 This place has a strong sense of character, dominated by two to three storey Victorian terraces and suburban houses with large gardens. Developments should reflect this characteristic with the exception of the South Kilburn Growth Area which is identified as a Tall Buildings Zone where more intense redevelopment at higher densities is part of the SPD for the area. ~~Elsewhere~~ In intensification corridors such as the A407 High Road and A4003 Willesden Lane, denser development buildings up to 5 storeys in height could be appropriate.^{MiM90}

Homes

- 5.6.13 Kilburn Square is the principal opportunity site in Kilburn Major Town Centre. Including the council's land ownership will allow for a more comprehensive scheme which could provide a new public square giving Kilburn Town Centre a much needed focal point and meeting space. The site offers the opportunity to replace the poor quality market facility with a new market and accompanying retail units with larger-floorplate, which are required to support Kilburn's role and function as a Major centre.
- 5.6.14 Cricklewood Retail Park which contains a Matalan and Wickes store is located outside of Brent's town centres. The buildings which take the form of large format retail warehouses and dominant car parking do not contribute positively to the character of the area. The opportunity should be taken for a residential-led scheme which will provide new homes and improve the quality of the environment and make more efficient use of the land. Notwithstanding the existing retail uses, the council seeks to direct retail to existing town centres to support their viability.
- 5.6.15 In Cricklewood Town Centre there have been a number of infill developments which are not sympathetic to the character of this proposed Conservation Area. Redevelopment of these sites to a style more sympathetic to the existing character and uniformity of the terraces fronting the A5 would have a positive impact on local character. In addition, redevelopment should contribute to enhancing the setting of the A5 through public realm improvements and tree planting.
- 5.6.16 Within Willesden Green Town Centre there are a number of key sites which could help to support its viability. The Sainsbury's supermarket is set back from the main high street. Comprehensive redevelopment of the Sainsbury's, car park and adjoining uses for mixed-use development could make better use of this site, improve public realm and create a stronger connection between the retail use and high street. Queen's Parade is a one storey parade of shops. Given that the parade is within a

town centre and in an area of high public transport accessibility, more efficient use could be made of the site by developing residential above ground floor town centre uses. This would help contribute to providing homes whilst also maintaining the town centre uses. The once vacant Police Station is now occupied by employment uses. There is demand for workspace in Willesden Green and this use is consistent with its location in secondary frontage and the ambition to promote the town centre as a Creative Hub. However, there is a need to manage the impact of the employment uses on surrounding residential areas. Redeveloping the site for mixed-use development including employment floorspace to create an active frontage could help better manage these impacts.

Town Centres

- 5.6.17 Kilburn has the highest comparison goods turnover of any centre in the borough, and has increased its market share over the past decade. This positive momentum needs to be protected and enhanced. Kilburn acts as the principal evening economy destination for residents of the Cricklewood area, as well as many residents in its immediate catchment, but faces strong competition from a range of other locations including central London, Camden, and St John's Wood. Building on the introduction of the Jubilee Line Night Tube and promoting evening uses including food and drink 'clusters', will extend the trading life of the centre from retail hours, through to later into the evenings.
- 5.6.18 Queen's Park and Kensal Rise play an important role in the evening economy function of the sub-area, Kensal Rise on account of the independent cinema and Queen's Park as an eating and drinking destination. Cricklewood has a diverse restaurant offer. Development of further uses which support these functions should be supported, but care should be taken that the centre's ability to meet day-to-day shopping needs is not eroded.
- 5.6.19 Although the core of Willesden Green Town Centre is successful, the west experiences a high level of vacancies and a poor quality environment. These units fall outside of the town centre boundary. In the interests of promoting a more compact and viable centre the council will support the diversification of these areas to other uses, including housing and employment.

Community and Cultural Facilities

- 5.6.20 The need for new community facilities is primarily within South Kilburn Growth Area, due both to the planned population growth and the need to improve life chances in the area, which is currently within the 10% most deprived areas in the country. New infrastructure required to support the development include a 3 form entry primary school, nursery, Healthy Living Centre, community space and Enterprise Hub.
- 5.6.21 An assessment of playing pitch provision identified some of the facilities at Gladstone Park require improvement to meet future demand. The sports centre in Willesden,

including running track, is one of only three Council sports centres in the borough and plays an important role in providing sporting facilities.

Employment and Skills

5.6.22 The Brent Workspace study identified existing clusters of creative industries in Queen's Park Design District focused along Lonsdale Road and Queen's Park Town Centre, Kilburn and Willesden Green Town Centre, and an unmet demand for incubators, accelerators and co-working space. Within this area there are no designated ~~employment-industrial~~^{MiM91} sites, but a high level of micro-businesses and home working. This is something the council wishes to support and enhance both to improve employment opportunities, encourage enterprise and to reduce the need to travel to central London for work and associated pressure on the transport network. These creative clusters will be protected and where redevelopment of local employment sites are proposed new workspace to meet identified need will be secured.

Open Space and Biodiversity

5.6.23 Whilst the south of this place is well served by open spaces, there are areas of deficiency to the north. There are limited opportunities to secure additional open spaces through redevelopment, given the lack of large scale sites identified for development. It will therefore be important to ensure the quality of existing open spaces are enhanced. In the Keep Britain Tidy^{MiM92} qualitative study forming part of the Brent Open Space Study (2019), open spaces in this place overall scored highly. However, scope for improvements were identified in particular to Rainbow Park, Aylestone Avenue and Chapter Road Open Spaces. South Kilburn Growth Area is an opportunity to secure additional open space with pocket parks to be secured and Kilburn Park enhanced.

Transport

5.6.24 Projected population growth will place pressure on the road network, meaning the only sustainable long term solution is to promote active and sustainable travel over private vehicle use. A key barrier to encouraging people to use public transport over private vehicles is that orbital links in this part of the borough are reliant on the bus network and therefore unreliable. The West London Orbital, which will make use of the existing Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to High Speed 2 and ~~Crossrail~~ Elizabeth Line^{MiM93} and Old Oak and to the east Thameslink at Brent Cross. This will significantly improve public transport accessibility levels in areas which are currently poorly served.

5.6.25 The A5 corridor is an important gateway into both Brent and central London. It is heavily trafficked, which creates an unattractive environment both for residents living along the route and businesses. Reducing car dominance and creating a more attractive environment designed to healthy streets standards, will have a positive

impact on residents by helping to mitigate poor air quality through tree planting. It will also benefit businesses, particularly those operating in Kilburn and Cricklewood Town Centres, by creating an attractive environment which will increase footfall and dwell time and in turn the viability of these centres.

- 5.6.26 Improving cycle routes and the public realm will encourage more people to cycle or walk and take pressure off the road network, which will have recognised health and environmental benefits.

POLICY BSEGA1 SOUTH KILBURN GROWTH AREA

South Kilburn will be a thriving, vibrant and sustainable community. The council will continue to facilitate a shift from the housing estates of the 1960s and 1970s to new high quality housing, a flourishing local economy supported by adequate infrastructure, a high quality, safe and healthy local environment, and the amenities and sense of space and place to support a diverse and vibrant local culture.

All developments will achieve the highest design standards and contribute positively to the delivery of the wider landscape and public realm strategy to better integrate South Kilburn into the surrounding area.

The priority will be to re-provide social rented housing for existing tenants of South Kilburn. Elsewhere the council will seek a mix of tenures to meet the needs of the wider Brent population.

Retail provision will be supported to enhance the vitality and viability of the existing neighbourhood parade on Malvern Road and to provide greater ground floor animation from Albert Road through to the Peel site.

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)^{MM57} to 2041, supported by social and physical infrastructure to include:

- **An expansion by 1FE of the South Kilburn Park Junior School and Carlton Vale Infant School on a new site plus provision of community space to be used out of school hours;**
- **Provision of a new South Kilburn Health Centre within the Peel Site;**
- **Retention of the Granville Centre enterprise hub and community space and provision of residential on the site;**
- **Existing community spaces retained or premises relocated and improved;**
- **South Kilburn Park will be extended and enhanced;**
- **Additional public open space will be provided on the Gloucester House and Durham Court site; on the existing Hereford House/Exeter House site; as a replacement for the existing Granville Road open space; Denmark Road Pocket Park; and along Cathedral Walk;**

- **Enhanced public realm in line with the public realm strategy and increased tree planting.**

- 5.6.27 The council-led renewal of South Kilburn Growth Area is a 15-year programme up to the mid-2020s. The council's objective is to improve living conditions in South Kilburn by providing new facilities and high quality homes including at least 1,200 affordable homes for social rent for existing South Kilburn tenants, supported by homes for market sale. Two phases have been completed and the quality of new housing, community facilities and open space has been recognised with a number of awards. As of 2019 approximately 500 secure tenants are now living in their new homes, The Granville Centre enterprise and community hub has opened, Cambridge Gardens has been improved and Woodhouse Urban Park opened in spring 2016, providing a park and play spaces for all ages. Additional community facilities with planning permission include a new health centre at the Peel site are about to be built.
- 5.6.28 The revised South Kilburn SPD provides detailed guidance on how policy BSEGA1 will be realised. The SPD sets out detailed guidance to ensure new development achieves the highest standards of design and contributes to the open space and public realm strategy and can facilitate the provision of additional homes.
- 5.6.29 Future improvements include reconfiguration of Kilburn Park, with the existing school relocating to the east. The school move will result in no loss of open space and create a more regular shaped space that can be put to better use and feel more secure. It will raise 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.
- 5.6.30 The existing 2 form entry Kilburn Park Junior School and Carlton Vale Infant Schools will be co-located and extended to create 3 forms of entry. This will accommodate additional children generated by the provision of new homes, provide high quality and up-to-date teaching facilities to increase local educational attainment and provide the opportunity to incorporate a range of community facilities out of hours.
- 5.6.31 South Kilburn is within walking distance of Queen's Park and Kilburn Town centres. The majority of shops and services to meet day to day needs within the Growth Area will be located within local shopping parades at Salusbury Road, Kilburn Lane and Malvern Road. These will be supplemented by small scale provision in active ground floor frontages along Carlton Vale and adjacent to Kilburn Lane. In addition, facilities which complement the healthcare hub and public square will be located on the Peel site.

KEY SITE ALLOCATIONS

South Kilburn Growth Area

Cricklewood Retail Park ~~and Town Centre sites~~

Kilburn Market Square

Willesden Green Town Centre sites^{MiM94}

OTHER POLICY GUIDANCE


South Kilburn SPD

Mapesbury Conservation Area Design Guide

North Kilburn Conservation Area Design Guide

Queen's Park Conservation Area Design Guide^{MiM95}

BESA1 AUSTEN

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Residential, community space and church</p>		
<p>Allocated Use</p>	<p>Mixed tenure housing development incorporating the Marian Community Centre and Immaculate Heart of Mary Catholic Church.</p>		
<p>Indicative Capacity</p>	<p>99</p>		
<p>Timeframe for Delivery</p>	<p>01-5 Years</p>	<p>56-10 Years</p>	<p>110+ Years</p>
	<p>99</p>		

Address	1 -167 Austen House, Cambridge Road, NW6 5YL
Area	0.35ha
Description of Existing Site	Austen House and Dickens House redevelopment sites suffer from inherent internal design problems and the relationships between buildings, streets and spaces are also poor and indeterminate. Built using the 'Bison' method of construction Austen and Dickens form two opposing 18 storey towers linked by podium deck incorporating a playground under which there is garaging. At present Austen presents an inactive ground floor frontage to a public realm dominated on Cambridge Road by the blank rear wall of a separate single storey garage and surface level car parking. Austen House contains 167 dwellings.
Ownership	Public. Church in private ownership
Planning History	None
PTAL Rating	5 (current and 2031 estimate)
Planning Considerations	<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 <u>mean a car free development should be the starting point.</u>
Risks	Need to decant existing residents.
Design Principles	<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 <u>seek to</u> 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 <u>church and community</u> uses.
Infrastructure Requirements	<ul style="list-style-type: none"> • Church and community centre. • 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. Thames Water will need to be engaged

	<p>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	<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 • <u>Capacity</u> for more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets. ^{MM58}

POLICY BESA2 BLAKE

Site Plan



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September
2018

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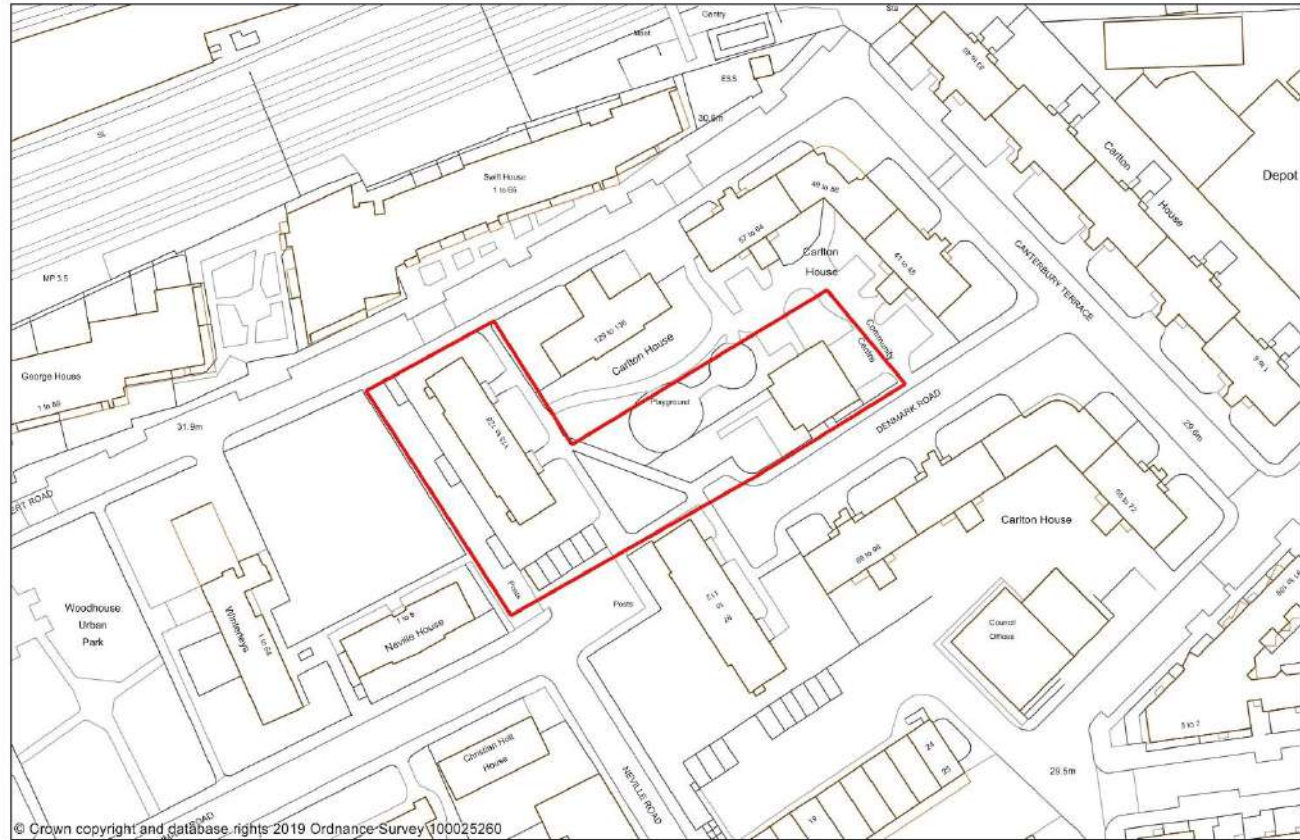
Existing Use	Residential
Allocated Use	Mixed tenure housing development.
Indicative Capacity	121

Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
		121	
Address	1-72 Blake Court, Malvern Road, <u>NW6 5PW</u>		
Area	0.3ha		
Description of Existing Site	Built using the 'Bison' method of construction. Blake is three six storey loosely connected blocks of 72 dwellings forming the southern part of a Dickens, Blake, Austen horseshoe shape around a semi-public space. Dickens is poorly defined in terms of public/private space and its relationship with Malvern Road and Cambridge Road where dead frontage, service areas and parking also prevail.		
Ownership	Public		
Planning History	None		
PTAL Rating	3-5 (<u>current and 2031 estimate</u>)		
Planning Considerations	<ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area <u>and</u> 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. 		
Risks	Need to decant existing residents.		
Design Principles	<ul style="list-style-type: none"> • Blake will be a perimeter block building ranging in height from 4-8 storeys. It will provide <u>active</u> 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 <u>seek to</u> prevent north facing single aspect unit and maximise sunlight and daylight to the courtyard. 		

<p>Infrastructure Requirements</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 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>	<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 more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets.</u> ^{MM59}

BSEA3 CARLTON HOUSE

Site Plan



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27 June 2019

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Existing Use

Residential and community space

Allocated Use	Mixed tenure housing development.		
Indicative Capacity	116 (100 net)		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	116		
Address	113-128 Carlton House and Carlton Hall, Denmark Road, <u>NW6 5DX</u>		
Area	0.2ha		
Description of Existing Site	The site comprises a 1950's four storey residential block, playground and Carlton Hall a one storey community space. Much of the development has poor definition of public and shared space and presents an inactive frontage to Denmark Road.		
Ownership	Public		
Planning History	None		
PTAL Rating	5 (<u>current and 2031 estimate</u>)		
Planning Considerations	<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> 		
Risks	Need to decant existing residents.		
Design Principles	<ul style="list-style-type: none"> The development should blend into the new urban grid and present a strong frontage onto Denmark Road and Neville Road. Heights should range between 4 and 6 storeys to reflect proposals for surrounding buildings. 		
Infrastructure Requirements	<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. 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. 		

Justification	<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 <u>better identify and improve both private and public outdoor spaces</u> and improve tenants shared private space and• Higher density development of currently <u>underutilised</u> make better use of land. which is developed to low densities. ^{MM60}• A new dedicated community hub is provided at Carlton and Granville Centre as part of the wider masterplan.

BSESA4 CARLTON INFANT SCHOOL

Site Plan



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Existing Use	Primary school		
Allocated Use	Mixed tenure housing development.		
Indicative Capacity	62		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	62		
Address	Carlton Vale Infant School, Malvern Place, NW6 5PX		
Area	0.4ha		
Description of Existing Site	The site currently comprises a single storey infants' school in relatively poor quality buildings, bounded by conifer planting on its northern edge along the existing Malvern Road. A separate play area now covers what was formerly part of Malvern Road.		
Ownership	Public		
Planning History	None		
PTAL Rating	2 (current and 2031 estimate)		
Planning Considerations	<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. 		
Risks	Need to relocate school		
Design Principles	<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 vehicular route as it is proposed to close vehicular access between Malvern Road and Carlton Vale. Ideally no or very limited car parking shall be provided between the new building frontages and the highway <u>and landscaping and planting should be improved</u> 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. 		

Infrastructure Requirements	<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. 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.
Justification	<ul style="list-style-type: none"> <u>The site will become available</u> following completion of the move of the school to its new site on the Wordsworth and Masfield the site will allow 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.^{MM61}

BESA5 CRAIK

Site Plan



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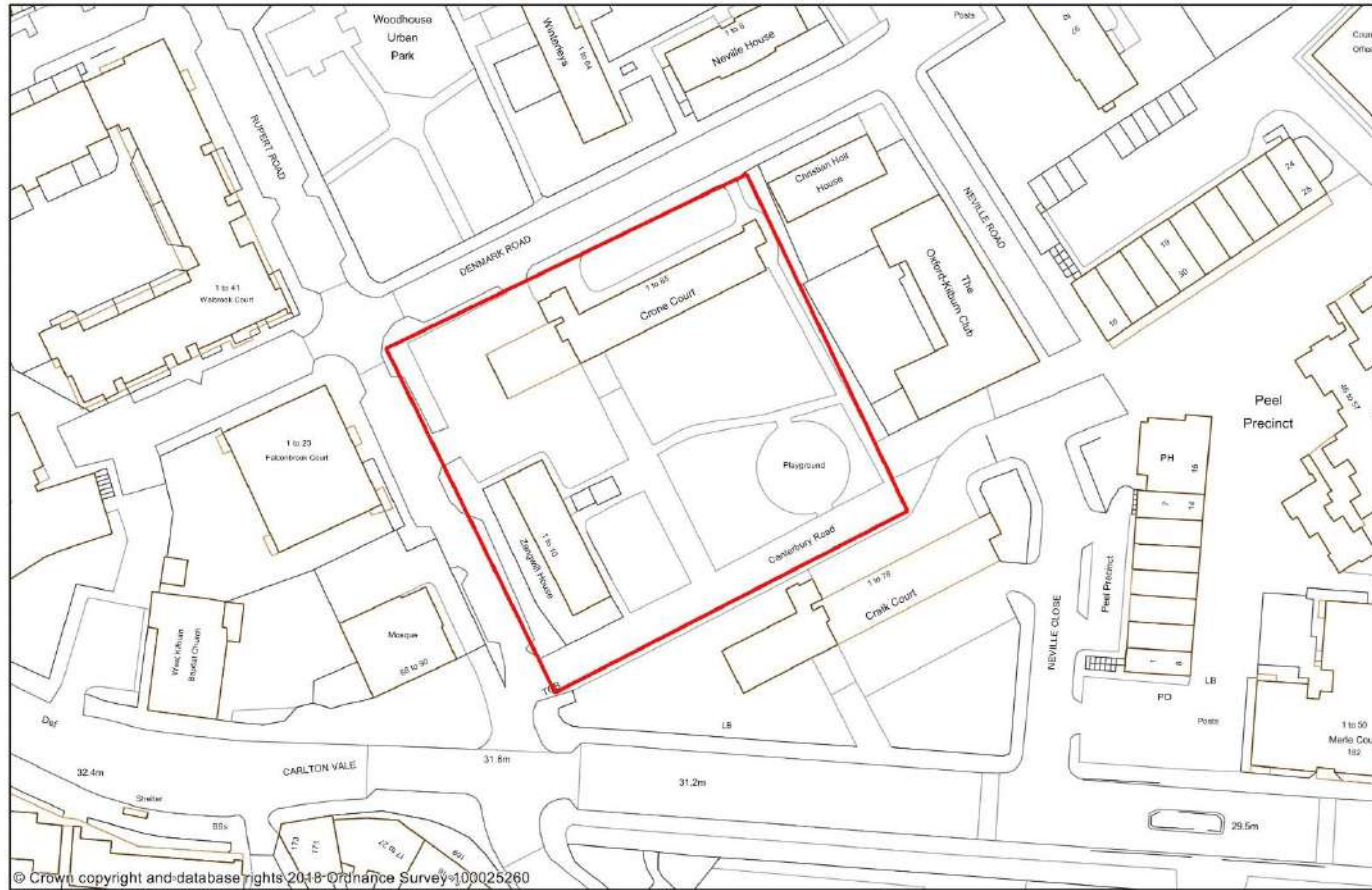
Existing Use	Residential
Allocated Use	Mixed tenure housing development with potentially ground floor commercial uses.

Indicative Capacity	120-50 net (121 gross)		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	20-121	10071	
Address	1-167 Dickens House, Malvern Road 1-78 Craik Court, Carlton Vale, NW6 5HN		
Area	0.29ha		
Description of Existing Site	Twelve storey residential tower of 72 dwellings with ground floor car parking set within landscaping with a small amount of car parking to the front on Carlton Vale and Neville Close and car parking to the rear with no clear boundary between public and private space along pedestrian route which follows the alignment of the Canterbury Road.		
Ownership	Public		
Planning History	None		
PTAL Rating	5 increasing to 6a in 2031 (current and 2031 estimate)		
Planning Considerations	<ul style="list-style-type: none"> The site is within the South Kilburn Growth Area <u>and</u> As with the majority of Brent the site is located within an Air Quality Management Area <u>where</u> 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> 		
Risks	Need to decant existing residents.		
Design Principles	<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. aActive ground floor uses if viable, with sufficient space for tree planting on Carlton Vale. 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>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. 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.
<p>Justification</p>	<ul style="list-style-type: none"> • Poor quality residential block which it is neither viable nor desirable to refurbish. • The opportunity exists to create a stronger corner which will act as a gateway to South Kilburn • to continue continuation of a commercial ground floor use from Queen's Park to Peel (if viable) • whilst continuing the step change in <u>improving</u> the quality of mixed use <u>and</u> mixed tenure residential accommodation. ^{MM62}

BESA6 CRONE & ZANGWILL

Site Plan



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September
2018

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Existing Use	Residential		
Allocated Use	Mixed tenure housing development with potentially ground floor commercial uses.		
Indicative Capacity	145		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	45	100	
Address	1-85 Crone Court, Denmark Road, NW6 5BX and 1-10 Zangwill House Rupert Road, Carlton Vale, NW6 5BY, Canterbury Road		
Area	0.45ha		
Description of Existing Site	<p>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.</p> <p>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.</p> <p>The entrances 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>		
Ownership	Public		
Planning History	None		
PTAL Rating	4/ to 5 (current and 2031 estimate)		
Planning Considerations	<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. 		
Risks	Need to decant existing residents.		
Design Principles	<ul style="list-style-type: none"> A perimeter block development to create frontage along Denmark Road, Rupert Street and Canterbury Road. Development is to range in height from 4 to 10 storeys. A taller 10 storey element should be located adjacent to Woodhouse Urban Park. 		

	<ul style="list-style-type: none"> The scale and form of the development should maximise sunlight and daylight to the courtyard and also Woodhouse Urban Park.
Infrastructure Requirements	<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. 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.
Justification	<ul style="list-style-type: none"> <u>Current buildings</u> The accommodation is <u>are</u> not viable to maintain or bring up to modern day standards. Redevelopment provides an opportunity to create a stronger frontage onto Woodhouse Urban Park <u>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.</u> whilst continuing the step change in <u>Improvement in</u> the quality of mixed use <u>and mixed tenure residential</u> accommodation. <small>MM63</small>

BSEA7 DICKENS

Site Plan



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September
2018

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Existing Use
Allocated Use

Residential
Mixed tenure housing development.

Indicative Capacity	62		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	40	22	
Address	1-167 Dickens House, Malvern Road, <u>NW6 5YP</u>		
Area	0.3ha		
Description of Existing Site	Built using the 'Bison' method of construction Austen and Dickens form two opposing 18 storey towers linked by podium deck incorporating a playground under which there is garaging. At present Dickens presents an inactive ground floor frontage of garages, with a small car park, green space and rear of separate garage block on Malvern Road. Dickens House contains 167 dwellings.		
Ownership	Public		
Planning History	None		
PTAL Rating	3 (current and 2031 estimate)		
Planning Considerations	<ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area <u>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.</u> • 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. 		
Risks	Need to decant existing residents.		
Design Principles	<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 orientated to avoid overlooking issues with the neighbouring school. • The scale and form of the development should seek to prevent north facing single aspect units. 		

	<ul style="list-style-type: none"> • 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.
Infrastructure Requirements	<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.
Justification	<ul style="list-style-type: none"> • The blocks <u>are</u> 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 more dwellings along sound urban design principles</u> that create a better environment and provide better connectivity through introduction of new streets. MM64

BESA8 HEREFORD HOUSE & EXETER COURT

Site Plan



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16 October
2018

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Existing Use	Residential and commercial		
Allocated Use	Mixed tenure housing development and new open space		
Indicative Capacity	20296 net (250 gross)		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	20296		
Address	1-124 Hereford House, <u>Carlton Vale, NW6 5QH</u> and 1-32 Exeter Court, <u>Cambridge Road, NW6 5AJ</u> Carlton Vale		
Area	0.8ha		
Description of Existing Site	<p>Hereford House is an 18 storey residential block comprising 124 dwellings. Exeter Court is 32 dwellings formed of four storey residential blocks, connected by a public open space at a podium level incorporating a playground under which is garaging and a commercial storage facility.</p> <p>The buildings are fragmented and present a blank frontage on to Carlton Vale and Granville Road, with public realm essentially comprising car parking/hardstanding for garage access interspersed with sporadic semi mature trees along the street edge.</p>		
Ownership	Public		
Planning History	None		
PTAL Rating	6a (current and 2031 estimate)		
Planning Considerations	<ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area <u>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.</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 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> 		
Risks	Need to decant existing residents.		
Design Principles	<ul style="list-style-type: none"> • The creation of <u>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.</u> 		

	<ul style="list-style-type: none"> • 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. • <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.
Infrastructure Requirements	<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.
Justification	<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 <u>Provision of</u> 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 <u>Density</u> 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 <u>Replacement of the Granville Open Space which is being developed for housing, (see site allocation</u>

BSESA11) with a ~~I~~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. MM65

BESA9 KILBURN PARK JUNIOR SCHOOL

Site Plan



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2018

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Existing Use	Kilburn Park Junior School		
Allocated Use	Open space		
Indicative Capacity	0		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
	0	0	0
Address	Kilburn Park Junior School, Carlton Vale, NW6 5RG		
Area	0.46ha		
Description of Existing Site	Currently the site is Kilburn Park Junior School		
Ownership	Public		
Planning History	None		
PTAL Rating	5 increasing to 6a in (current and 2031 estimate)		
Planning Considerations	<ul style="list-style-type: none"> The site is within the South Kilburn Growth Area <u>and</u> As with the majority of Brent the site is located within an Air Quality Management Area <u>where</u> 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</u> a car free development should be the starting point. 		
Risks	Need to relocate the school.		
Design Principles	<ul style="list-style-type: none"> Incorporated into the South Kilburn Park. 		
Infrastructure Requirements	Open space		
Justification	<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. 		

- | | |
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| | <ul style="list-style-type: none">• It will raise 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. ^{MM66} |
|--|--|

BSEA10 NEVILLE & WINTERLEY'S

Site Plan



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Brent

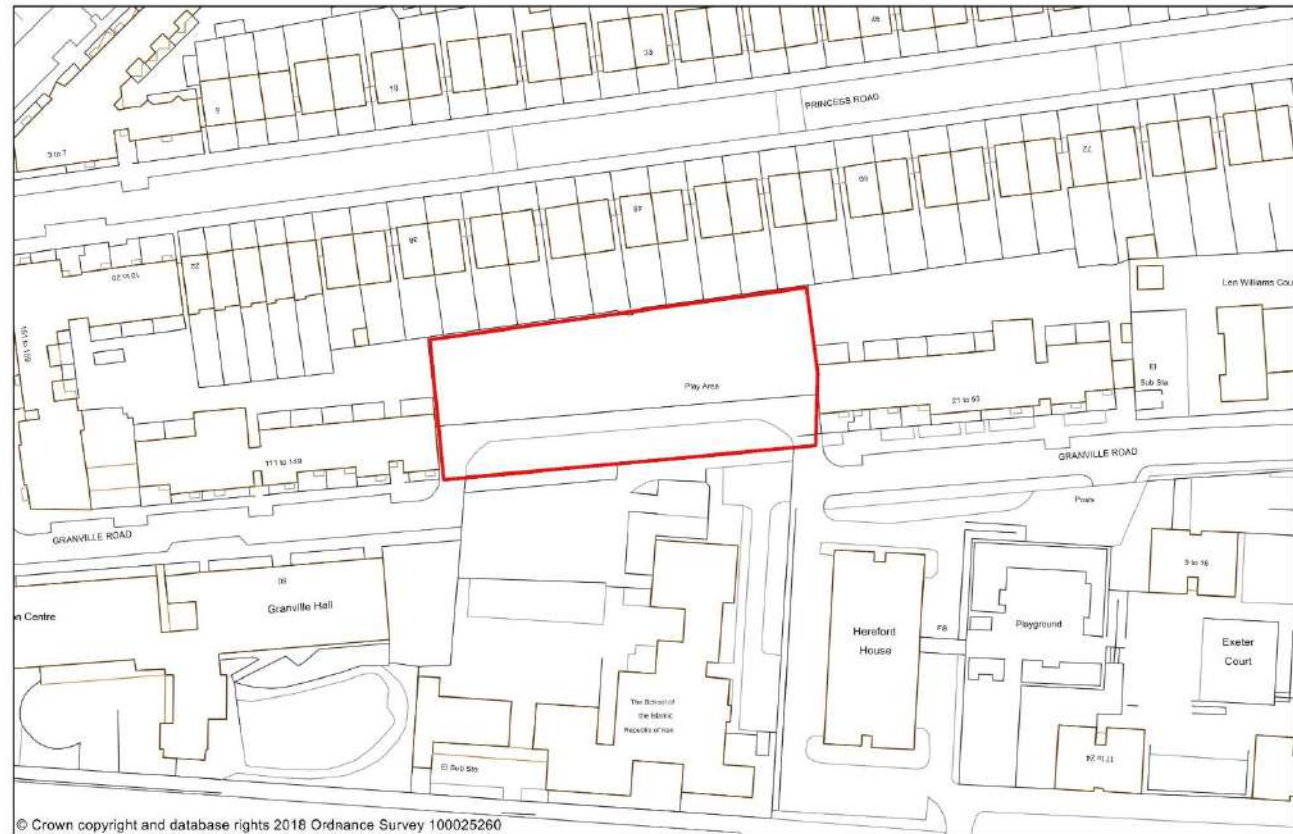
Existing Use	Residential
Allocated Use	Mixed tenure housing development.
Indicative Capacity	148 (76 net)

Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
		148	
Address	1-8 Neville House, Denmark Road NW6 5BT, and 1-64 Winterleys, Albert Road, NW6 5DR		
Area	0.34ha		
Description of Existing Site	More traditional 1950's council blocks. Winterleys is a 12 storey block of 64 dwellings which faces on to Woodhouse Urban Park but is currently separated from the park by car parking. Neville House is a four storey block with 8 dwellings. An open space which has no clear function as either public, or private/tenant space is to the east and north of the two blocks.		
Ownership	Public		
Planning History	18/4920 Redevelopment along with Carlton House. Provision of 264 dwellings.		
PTAL Rating	4/ to 5 (current and 2031 estimate)		
Planning Considerations	<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> 		
Risks	Need to decant existing residents.		
Design Principles	<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. 		
Infrastructure Requirements	<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. 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 		

	<p>to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p>
<p>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 creation of a courtyard will give residents access to more useable private space.</u> • This will contribute to the continued step change <u>Improvement</u> in the quality of mixed use <u>and</u> mixed tenure residential accommodation and public space. ^{MM67}

BSEA11 OLD GRANVILLE OPEN SPACE

Site Plan



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1:1000

16 October 2018

0 0.02 0.04 kilometres



Existing Use

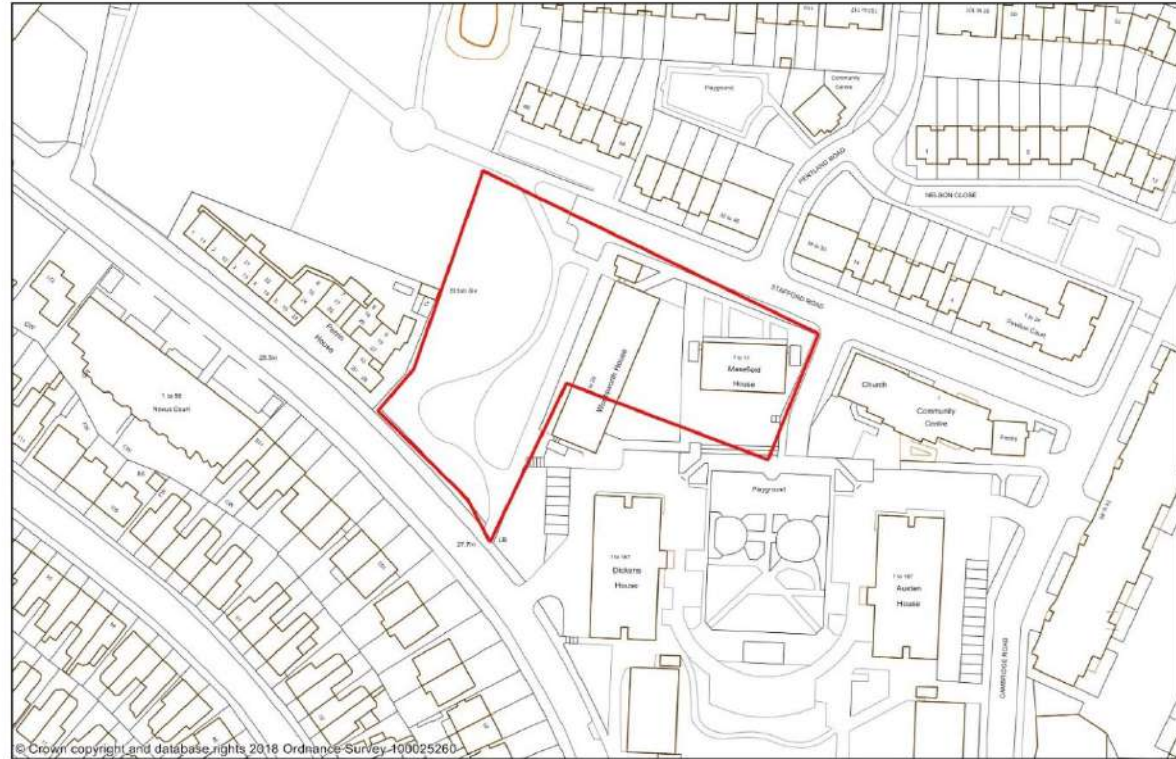
Open space and route

Allocated Use	Mixed tenure housing development and new open space		
Indicative Capacity	1020		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	020	10 ¹⁶¹	0
Address	Land west of 21-51 Granville Road		
Area	0.4ha		
Description of Existing Site	<p>aA small public open space essentially of seating areas <u>and forming within a typically functional municipal landscape created in the early phases of the South Kilburn estate's regeneration.</u> 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>		
Ownership	Public		
Planning History	None		
PTAL Rating	5 (<u>current and 2031 estimate</u>)		
Planning Considerations	<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> • South Kilburn Conservation Area adjoins the site on its northern boundary. • The site comprises open space. Compensatory open space of equivalent quality quantity and higher quality will be provided as part of the Hereford <u>House and Exeter Court (BSESA8)</u> 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 hHigh public transport accessibility level, being in walking distance of Kilburn Park and Kilburn High Road Stations. <u>mean a car free development should be the starting point. A bus stop is adjacent to the site on Carlton Vale.</u> 		
Risks	Securing sufficient land from the Iranian school site to re-open Granville Road to maximise development potential.		
Design Principles	<ul style="list-style-type: none"> • To essentially r<u>Replication of the character of the adjacent buildings. by</u> 		

	<ul style="list-style-type: none"> • creating buildings of a mModest height (typically 4 storeys with opportunities to vary by one storey as has occurred on the adjacent sites). • The buildings will fFrontage to the street and be set back from the pavement edge in a similar manner to that of 21-53 Granville Road, <u>to give</u> This will provide sufficient room for a defensible space, to ensure residents' privacy whilst • for incorporation of sSufficient landscaping to enhance the street setting.
Infrastructure Requirements	<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. 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 ahead of development 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.
Justification	<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. • tThe <u>redevelopment of the site is not dependent upon the reopening of Granville Road</u> currently incorporated into the Iranian school, <u>although this would be preferable.</u> might improve its accessibility and raise public awareness there is no certainty that its inherent potential weakness; a lack of natural surveillance will be satisfactorily addressed. <p>As such it is considered that there is merit in transferring the</p> <ul style="list-style-type: none"> • <u>Equivalent open space will be provided within</u> to the Hereford House and Exeter House development, <u>which</u> 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. <p>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> <p>MM68</p>

BSEA12 WORDSWORTH, MASEFIELD AND PART OF SOUTH KILBURN OPEN SPACE

Site Plan



1:1250

16 October 2018

0 0.025 0.05 kilometres



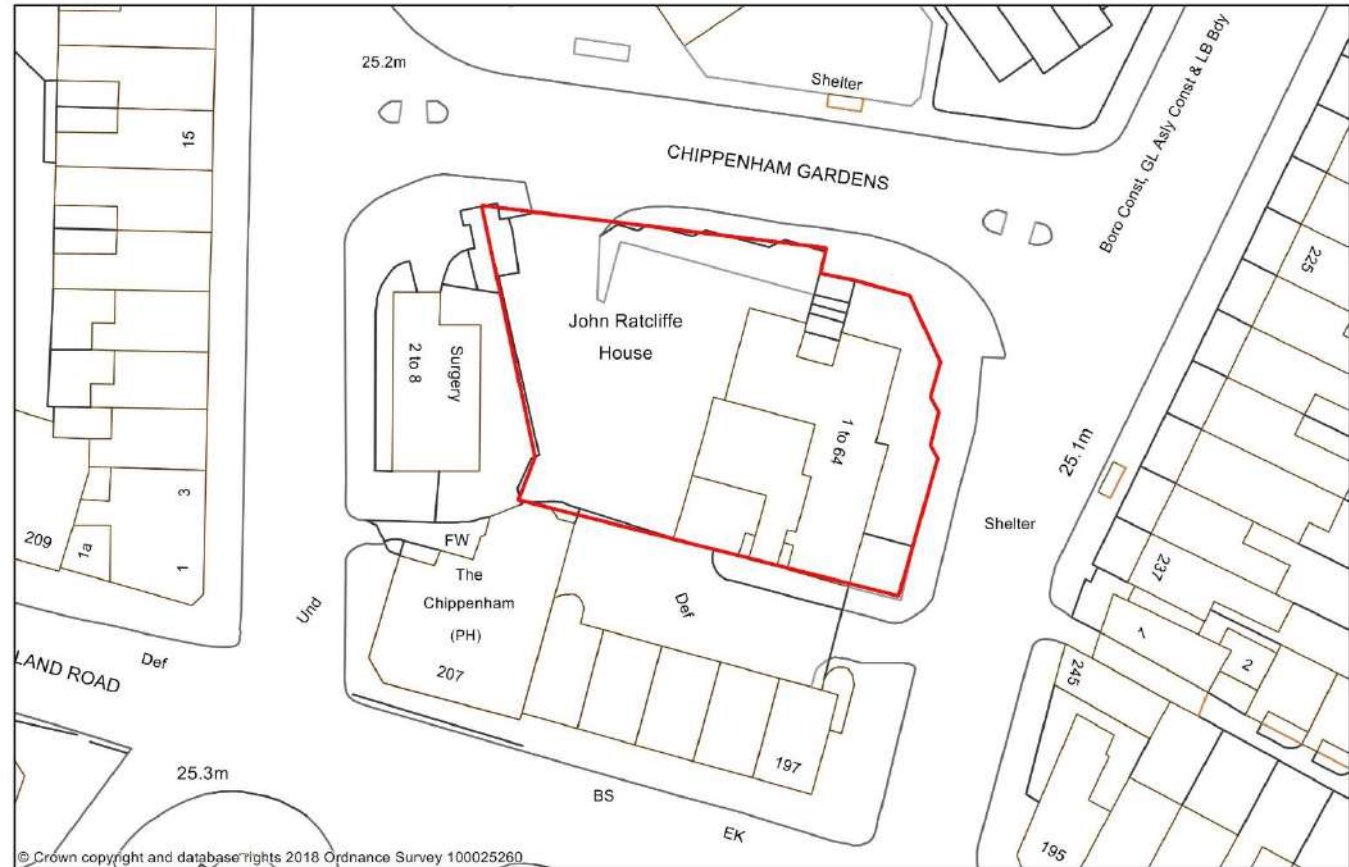
Existing Use	Residential with commercial at ground floor
Allocated Use	Redevelopment to provide a new 3FE school building to incorporate the existing Kilburn Park Junior and Carlton Vale Infants Schools, plus nursery, community space and residential.
Indicative Capacity	Unknown -40 net

Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
		-40	
Address	1-29 Wordsworth House <u>NW6 5YT</u> , and 1-11 Masefield House, <u>NW6 5YU</u> , <u>both</u> Stafford Road		
Area	0.3ha		
Description of Existing Site	<p>Wordsworth House is a six storey residential concrete block comprising 32 dwellings, a mixture of maisonettes and flats. Masefield House is a four storey of similar construction. It has commercial units at ground floor level, comprising launderette and retail uses.</p> <p>The open space is poorly defined. Undulating topography and the pinch point created by Perrin House and the Stafford Road dwellings to the north makes it feel detached from the remainder of the open space.</p>		
Ownership	Public		
Planning History	None		
PTAL Rating	3/4 (current and 2031 estimate)		
Planning Considerations	<ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area <u>and</u> 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 re-provided 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> 		
Risks	Need to decant existing residents.		
Design Principles	<ul style="list-style-type: none"> • The tThree storey school building (with <u>potentially with for additional</u> modest height increases to accommodate residential development, should this be provided to meet staff needs) • with clearly dDefined and animated frontages • will provide a perimeter block on Stafford Road and Percy Road, plus public realm to the south between it. 		

	<ul style="list-style-type: none"> • 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<u>Retention of</u> maturing trees and provide a more clearly defined boundary to the remaining open space.
Infrastructure Requirements	<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 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> ^{MM69} 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.
Justification	<ul style="list-style-type: none"> • The buildings are of poor construction and design, creating problems of antisocial behaviour. • The site provides an opportunity to decant the existing schools in a single move into a high quality contemporary purpose built building with shared facilities, and access by the community to its facilities out of school hours. • It will free up the existing Kilburn Park Junior School site to be incorporated into the South Kilburn open space, whilst the existing open space will become part of the school's amenity and learning space. This will allow a more clearly defined and regular shape open space to be created-which will increase its benefit to the population.

BESA13 JOHN RATCLIFFE HOUSE

Site Plan



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1:500

26
September
2018

0 0.01 0.02 kilometres



Existing Use	Residential with associated parking.		
Allocated Use	Mixed tenure housing.		
Indicative Capacity	35		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
		35-29	
Address	1-64 John Ratcliffe House, Chippenham Gardens, London, NW6 5LH		
Area	0.15ha		
Description of Existing Site	The current building is of 1970s brick design, rising to 9 storeys in height and has inactive frontages onto both Chippenham Gardens and Kilburn Park Road. To the south the site backs onto 3 storey terrace housing of Shirland Road which has commercial frontages on the ground floor. The west portion of the site comprises a car park which is enclosed by surrounding developments.		
Ownership	Public.		
Planning History	n/a		
PTAL Rating	4 (current and 2031 estimate)		
Planning Considerations	<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. • 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 mean a car free development should be the starting point. 		
Risks	Relocation of current residents and their opposing. Need to decant existing residents.		
Design Principles	<ul style="list-style-type: none"> • The frontage is to activate the street and interact with the new Chippenham Gardens development. 		

	<ul style="list-style-type: none"> • 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 <u>space</u> 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.
Infrastructure Requirements	<ul style="list-style-type: none"> • Green space. • Cycle parking. ^{MM70} • 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. 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.
Justification	<ul style="list-style-type: none"> • The building has a high proportion of smaller dwellings, this and its design and build quality means that it is subject to anti-social behaviour, and is unviable to retain in the longer term. • There is an opportunity to make better use of the space to meet a wider range of housing needs and overcome existing problems. • Reconfiguring the building to the plot boundaries will allow the creation of a useable shared courtyard for residents. • In addition, this will allow the height of the building to be lowered to better reflect the scale of surrounding buildings. • This will contribute to the continued step change in the quality of both residential accommodation and public space.

Indicative Capacity	213 gross (66 net dwellings taking account of demolition)		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
	-147	213	
Address	1-74 William Dunbar House, Albert Road, <u>NW6 5DE</u> , and 1-74 William Saville House, Denmark Road, <u>NW6 5DGE</u>		
Area	0.6ha		
Description of Existing Site	Two 1960's residential towers of 13 storeys. William Dunbar House has 73 dwellings and a ground floor council office complex and William Saville has 74 dwellings. At present the towers are poorly connected to the surrounding area due to being set back from the streets onto which they bound. William Saville has been placed where Denmark Road would have continued to Carlton Vale reducing permeability of the South Kilburn estate. The planting and landscape around these blocks is of a significantly better quality than the rest of the older blocks in the South Kilburn estate particularly along Carlton Vale and Albert Road. The provision of brick walls and fences along Carlton Vale provides clarity that the space is for tenants.		
Ownership	Public		
Planning History	n/a		
PTAL Rating	5 (current and 2031 estimate)		
Planning Considerations	<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. • 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 good 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. mean a car free development should be the starting point. 		
Risks	Relocation of current residents.		

Design Principles	<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 <u>for</u> a pedestrian link to Carlton Vale which should to be provided and development provided along this <u>active</u> frontage to create overlooking and <u>improve safety environment</u>.
Infrastructure Requirements	<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 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.
Justification	<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.^{MM71} • In addition, opening up the Denmark Road to pedestrian movement will allow improved connections from the South Kilburn estate into the wider area.

BSEA15 UK ALBANIAN MUSLIM COUNTY AND CULTURAL CENTRE

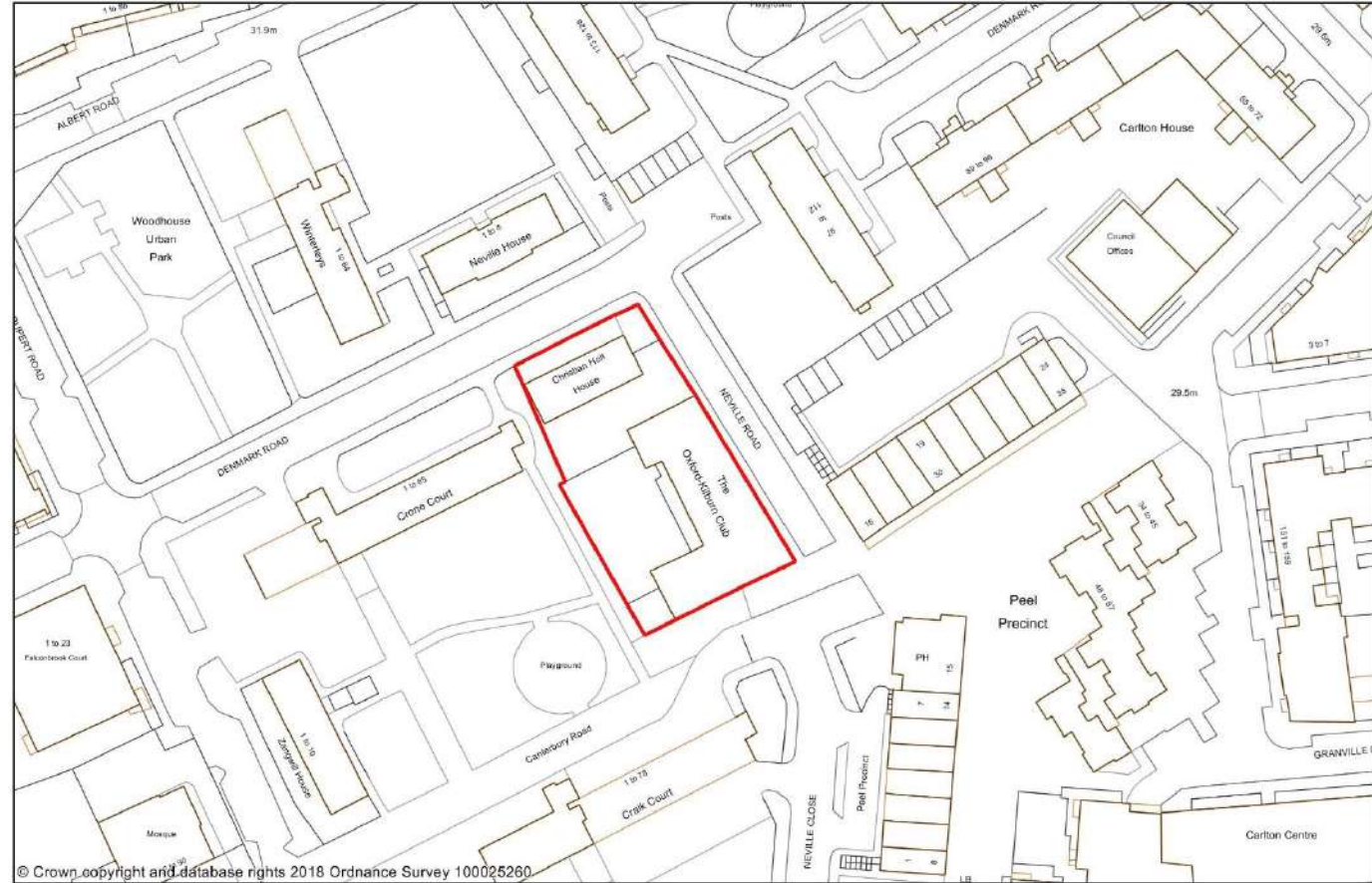
<p>Site Plan</p>	
<p>Existing Use</p>	<p>Community use</p>
<p>Allocated Use</p>	<p>Mixed use comprising community use and commercial or residential</p>

Indicative Capacity	Unknown		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
Address	88-90 Carlton Vale, NW6 5DA		
Area	0.05ha		
Description of Existing Site	Currently the site is a two storey utilitarian heavily altered 1950s building formerly a public house, with adjacent car park.		
Ownership	Public		
Planning History	n/a		
PTAL Rating	5 (current and 2031 estimate)		
Planning Considerations	<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 and 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 mean a car free development should be the starting point. 		
Risks	Impact on the operation of the community centre during redevelopment.		
Design Principles	<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. 		

	<ul style="list-style-type: none"> • The opportunity exists to create A corner landmark building rising to 6 storeys, and possibly higher if incorporating the Baptist Church car park, depending if on relationship with <u>other nearby adjacent existing or proposed buildings, produces a successful solution in terms of sympathetic relationship/overlooking/overshadowing of other buildings.</u> • The West Kilburn Baptist Church is to be retained and its setting enhanced.
Infrastructure Requirements	<ul style="list-style-type: none"> • When further information on the scale of development is available Thames Water will need to be engaged to establish impact on water supply network and water treatment infrastructure.
Justification	<ul style="list-style-type: none"> • The premises are a <u>Currently</u> poor piece of townscape at a very low density, <u>presenting blank walls to adjoining public realm.</u> • given the <u>Good</u> PTAL rate and <u>higher density emerging context.</u> potential heights of adjacent developments such as Craik House. The building currently presents essentially blank facades to the adjoining public realm. • The <u>Opportunity</u> exists to develop at a much higher density, particularly if incorporating the adjacent <u>West Kilburn Baptist Church</u> car park, whilst maintaining and improving the existing community use. ^{MM72}

BSEA16 OK CLUB

Site Plan



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1:1000

11 October
2018

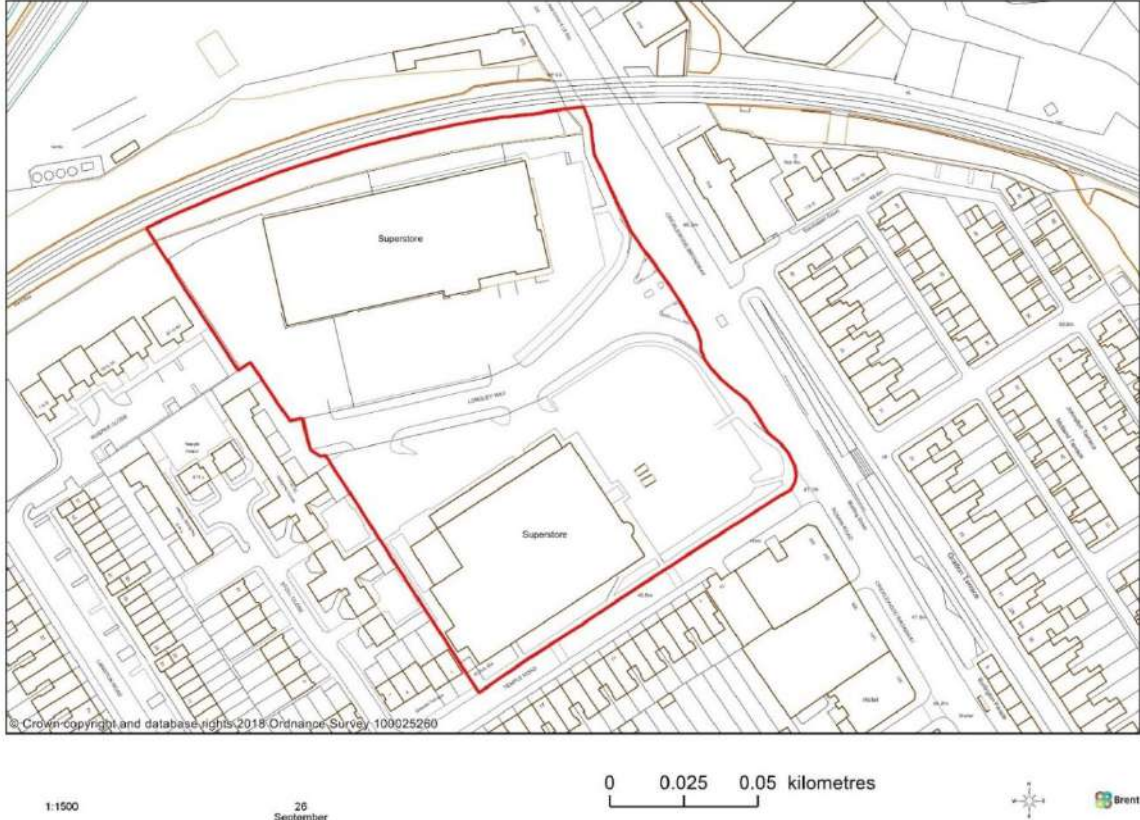
0 0.02 0.04 kilometres



Existing Use	Community use		
Allocated Use	Upgrading of existing community uses, plus mixed tenure residential development.		
Indicative Capacity	Unknown		
Timeframe for Delivery	0-5 Years	5-10 Years	10+ Years
Address	The Oxford Kilburn (OK) Club Neville Road, <u>NW6 5BT</u> and Christian Holt House, <u>45 Denmark Road, NW6 5BP</u>		
Area	0.2ha		
Description of Existing Site	The site is currently occupied by the Oxford and Kilburn Youth Trust, a charity that supports younger people in the area. The premises are a mixture of a three storey (1920's Neo-Georgian), two storey (1960s/70s) and single storey (1920s) buildings. These are used as administrative offices and also have a main single storey hall and other rooms for youth activities consistent with the provision of the services by the Trust. The site also contains a memorial wall and garden dedicated to Dylan Kirby.		
Ownership	Public		
Planning History	n/a		
PTAL Rating	4 to 5 (current and 2031 estimate)		
Planning Considerations	<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 accessibility levels, being in walking distance of links with a PTAL rating of 4, being within a 5 minute walk of 2 bus stops and Queens Park train station mean a car free development should be the starting point. 		
Risks	Impact on the operation of the community centre during redevelopment.		

Design Principles	<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. • Ideally the Dylan Kirby memorial wall should be kept in situ, or appropriately incorporated into the new building.
Infrastructure Requirements	<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>
Justification	<ul style="list-style-type: none"> • The Trust has approached the council regarding the potential Regeneration of the site <u>whilst providing to better support its activities in contemporary premises fit for sustaining the charity's activities and long term purpose,</u> and improving outcomes for young people. • Ideally the community use will remain on site, however 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 providing there would be 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 their they should necessarily be retained if high quality replacements <u>with higher quality buildings would be unacceptable.</u> are proposed. • The Dylan Kirby memorial is clearly well regarded by the local community and its sympathetic incorporation into any regeneration needs to be considered. ^{MM73}

BSEA17 CRICKLEWOOD BROADWAY RETAIL PARK

<p>Site Plan</p>			
<p>Existing Use</p>	<p>Commercial/parking, including: Wicks and Matalan superstores.</p>		
<p>Allocated Use</p>	<p>Residential and commercial</p>		
<p>Indicative Capacity</p>	<p>380</p>		
<p>Timeframe for Delivery</p>	<p>01-5 Years</p>	<p>56-10 Years</p>	<p>110+ Years</p>

		200	180
Address	311-317 Cricklewood Broadway, London, NW2 6JN.		
Area	2.3ha		
Description of Existing Site	The site currently consists of two large superstores (Wickes and Matalan) surrounded by large amounts of car parking. Longley Way intersects the site separating the two superstores. Wickes, to the north, backs onto the railway line. To the east is Cricklewood Broadway, from which the site is accessed. The south of the site is bordered by Temple Road and the west backs onto the 3 storey flats of Stoll Close and 3 storey terrace houses of Rusper Close.		
Ownership	Private		
Planning History	n/a		
PTAL Rating	3/ to 4 (current and 2031 estimate)		
Planning Considerations	<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. • The site has a Historic y of industrial use and will therefore requires testing for contamination, with any potential remediation works being carried out. 		
Risks	Lease length of existing retailers and a reluctance to move, or increasing value of existing use (due to lack of availability of alternative premises) slowing down redevelopment.		
Design Principles	<ul style="list-style-type: none"> • The dDevelopment 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. 		

	<ul style="list-style-type: none"> • 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 SINCC and <u>to help address issue</u> with surface water flooding, <u>and poor air quality along the A5</u> the development should include significant green infrastructure, <u>particularly along its edges</u>, 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.
Infrastructure Requirements	<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 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.
Justification	<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. <u>Opportunity to optimise the density of the site</u> 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. MM74

BSEA18 245-289 CRICKLEWOOD BROADWAY AND HASSOP ROAD

Site Plan



1:1500

08 May
2019

0 0.025 0.05 kilometres



Existing Use

Commercial and associated warehousing and car parking.

Allocated Use	Residential and commercial.		
Indicative Capacity	80		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
		40	40
Address	2435-289 Cricklewood Broadway and Hassop Road, London, NW2 6NX		
Area	0.695ha		
Description of Existing Site	<p>The site currently contains a large inter-War block of commercial units with frontages onto Cricklewood Broadway and Hassop road comprising warehouse access and vehicle repair garages. The roof of the block contains parking which is also accessed via 253 Cricklewood Broadway and exited at the rear onto Hassop Road. The units are made of materials unsympathetic to local appearance, including concrete and corrugated iron. The north of the site is bounded by a building of typical character for Cricklewood Broadway, being a 3 storey period terrace house with ground floor commercial frontage. To the east there is a small green space bordering Cricklewood Broadway with residential terrace housing behind. The south of the site is bordered by a single storey building of local architectural character and the west by two storey housing.</p>		
Ownership	Private.		
Planning History	n/a		
PTAL Rating	5 (current and 2031 estimate)		
Planning Considerations	<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 <u>industrial</u> uses which improve amenity for neighbouring residential units. 		

	<ul style="list-style-type: none"> • 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. • 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.
Risks	Multiple ownership.
Design Principles	<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.
Infrastructure Requirements	<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.¹⁶⁷
Justification	<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. • 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.^{MM75} • Existing vehicle repair garages are negatively impacting on the amenity of adjoining residents. Replacement with lighter industrial uses would help reduce amenity impacts.

BSEA19 GAUMONT STATE CINEMA

Site Plan



1:1000

27 June 2019

0 0.02 0.04 kilometres



Existing Use

Community use

Allocated Use

Leisure and community uses

Indicative Capacity	0		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
Address	197-199 Kilburn High Road, NW6 7HY		
Area	0.7ha		
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>		
Ownership	Private		
Planning History	Change of use from theatre club to place of worship (09/1508)		
PTAL Rating	4-6 (2015/2031) 4 to 6 (current and 2031 estimate)		
Planning Considerations	<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> <u>Given its Grade II* Listed significance early consultation is advised with consultees such as Historic England, C20 Society, and Theatres Trust. Applications for changes of use and substantial alterations to the building will need to be supported and justified within a Heritage Statement.</u> 		

	<ul style="list-style-type: none"> • <u>Continued access to the adjacent carpark area and workshop at the rear which, when back in use, would be are considered essential to the long term viability of servicing the building 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. • 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.
Risks	<ul style="list-style-type: none"> • Need to protect and preserve the listed building, whilst ensuring its continued use. • Need to protect the potential of cultural and community uses for the building.
Design Principles	<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).</u> As such, retention, preservation and enhancement of <u>Any proposals will be required to retain and enhance the Gaumont State building and its setting are required, the building's interior forms part of its significance and should be preserved.</u> 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, 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. 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.
Infrastructure Requirements	-

Justification	<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 <u>and help safeguard its future.</u> MM76
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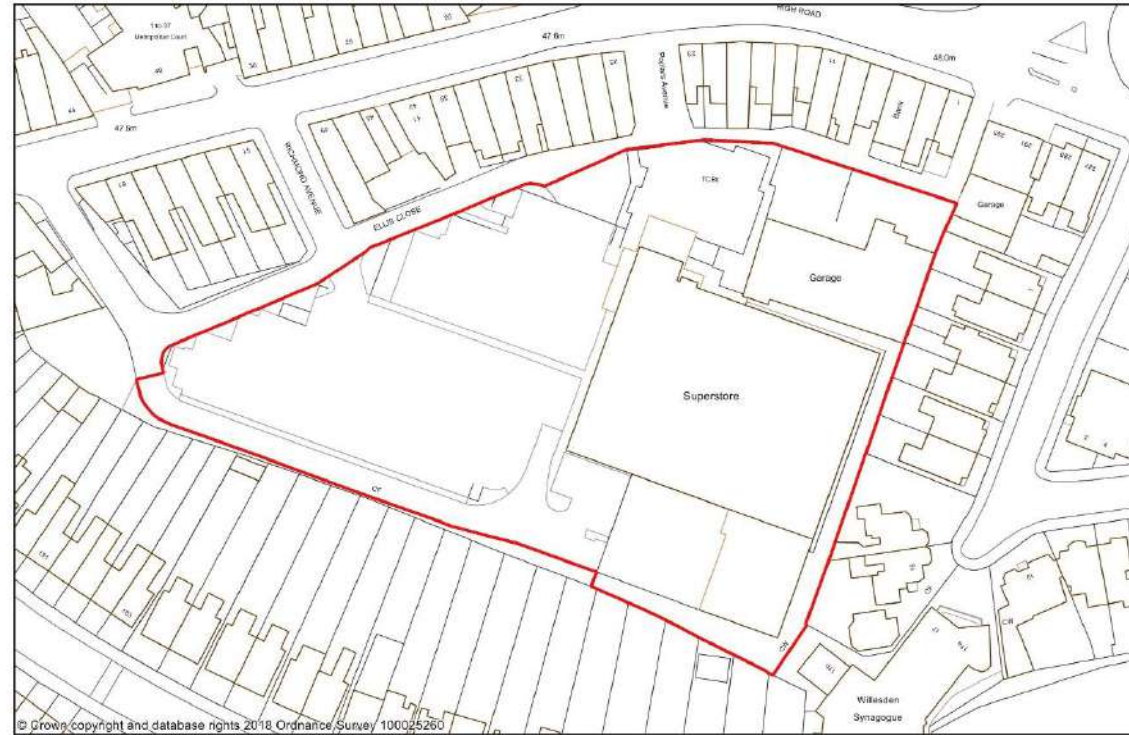
Allocated Use	Mixed-use development including residential, retail including a new market and public square		
Indicative Capacity	100		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years
		50	50
Address	Kilburn High Road, NW6 6JH		
Area	1.1ha		
Description of Existing Site	Kilburn Square is a prominent site on Kilburn High Road. It comprises mixed-use development constructed in the 1960s including a market, car parking, offices, health centre, parade of retail units and housing. Two storey retail units front the high road. There are residential flats of 5 storeys in height with car parking spaces and private green space behind the shopfronts, as well as a health clinic.		
Ownership	Private and council owned		
Planning History	Refurbishment of ground floor retail and provision of replacement market, with residential above (06/3094).		
PTAL Rating	6a (current and 2031 estimate)		
Planning Considerations	<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 <u>will is to be required to be retained and improved in accordance with the requirements of policy BE8 – Markets and Car Boot Sales.</u> • 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 <u>which will require appropriate assessment and if necessary mitigation strategies prior to development.</u> • 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. • <u>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.</u> 		

	<ul style="list-style-type: none"> • 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. • 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. A Flood Risk Assessment will be required. • 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, with regards to High Road night-time uses. 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.
Risks	Need to manage impact on existing occupiers including market stall holders, during construction.
Design Principles	<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. Development fronting the High Road should integrate well with the surrounding context and consider character, setting, and the form and scale of neighbouring buildings.</u> • Given surface water flooding and poor air quality it will be important development seeks to increase soft landscaping.

	<ul style="list-style-type: none"> • 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.
Infrastructure Requirements	<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>
Justification	<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 <u>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.</u> • 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. • 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 <u>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.</u> ^{MM77}

BSEA21 WILLEDEN GREEN SAINSBURY'S AND GARAGES

Site Plan



1:1000

26
September
2018

0 0.02 0.04 kilometres



Existing Use	Supermarket, car parking and an employment retail use.		
Allocated Use	Mixed-use including housing and retail and employment uses.		
Indicative Capacity	50		
Timeframe for Delivery	01-5 Years	56-10 Years	110+ Years

		25	25
Address	Sainsbury's, High Road, London, NW10 2TD.		
Area	1.24 ha		
Description of Existing Site	<p>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 <u>fireplace and antique architectural pieces showroom</u> 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>		
Ownership	Private		
Planning History	n/a		
PTAL Rating	4 (<u>current and 2031 estimate</u>)		
Planning Considerations	<ul style="list-style-type: none"> The site is Within Willesden District Town Centre <u>Secondary Shopping Frontage</u> where <u>replacement ground floor retail frontage will be sought</u> and is adjacent to the Willesden Town Centre Conservation Area. The Sainsbury's currently represents part of Willesden Town Centres <u>Secondary Shopping Frontage</u>. 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. <u>As such an increase in employment floorspace will be sought.</u> 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, <u>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.</u> 		

	<ul style="list-style-type: none"> 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.
Risks	<ul style="list-style-type: none"> Multiple ownership. Impact on operation of supermarket during construction.
Design Principles	<ul style="list-style-type: none"> The scale of development should take into account the proximity of surrounding low density housing, being sure not to overshadow. The layout and route network should ensure commercial uses have a strong connection to the High Road. Public realm should be of a high quality and provide opportunities for interaction. The site currently has very little greenery and should therefore look to enhance the environment with the addition of trees and general landscaping.
Infrastructure Requirements	<ul style="list-style-type: none"> 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. There is a Thames Water asset located on this site and development proposals will need to take account of this feature.
Justification	<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. 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. To protect the vitality and viability of the centre the supermarket should be retained. 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. 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.

- 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.

MM78

FIGURE 27: OTHER SITE ALLOCATIONS

Ref.	Address	Size (ha)	Existing Use	Allocated Use	Indicative homes	Comments
BSESA22	Queen's Parade, 1-12 Queens Parade, Willesden Lane, London, NW2 5HT	0.06	Retail	Housing or student accommodation with ground level retained for commercial use.	20-42	17/0322 pending decision <u>mined to approve</u> MM79
BSESA23	Former Willesden Green Police Station, 96 High Road, Willesden, London, NW10 2PP.	0.14	Vacant former police station and residential	Mixed-use employment and residential	20	The police station building contributes positively to the character of Willesden Green Conservation Area and the setting of the adjoining listed buildings. Any proposals for the police station building should include its retention and reuse as well its curtilage walls and structures.
BSESA24	Kilburn Station arches, Exeter Road, NW2 3UH	0.05	Commercial	Commercial uses, including workspace	0	Environmental improvements encouraged
BSESA25	Park Avenue Garages, St Paul's Avenue, NW2 5TG	0.23	Commercial	Residential	5070	<u>17/5291 allowed at appeal</u> MM79
BSESA26	Park Avenue North Substation, Marley Walk, NW2 4PY	0.34	Substation	Residential. Potential for self or custom-build	2	Mature trees
BSESA27	Car Wash Strode Road, NW10 2NN	0.06	Commercial	Residential. Potential for self or custom-build	4	
BSESA28	80 Strode Road, NW10 2NH	0.18	Commercial	Mixed-use employment <u>industrial</u> and residential ¹⁷⁵	10	

Ref.	Address	Size (ha)	Existing Use	Allocated Use	Indicative homes	Comments
BSESA29	Willesden Telephone Exchange, 50 Harlesden Road, NW10 2BU	0.37	Commercial	Mixed-use employment and residential	20	
BSESA30	61-65 Shoot Up Hill, London, NW2 3PS.	0.3	Commercial, residential and doctor's surgery	Residential and reprovision of doctor's surgery	20	
BSESA31	Turpin's Yard, Oakland Road, London, NW2 6LL	0.4	Employment	Residential and managed affordable workspace	8	Provision of workspace in accordance with policy BE3 required.
BSESA32	45-55 Cricklewood Broadway, London, NW2 3JX	0.08	Commercial	Residential and ground floor commercial	10	
BSESA33	123-129 Cricklewood Broadway, London, NW2 3JG	0.07	Commercial and residential	Residential and ground floor commercial	12	
BSESA34	Kilburn Park Underground Station	0.09	Station and commercial	Stations, ground floor commercial and residential uppers	Unknown 20 MM79	Sensitive location due to proximity of listed buildings, conservation areas and existing station building. Development to be consistent with South Kilburn Masterplan SPD contents.
BSESA35	303 – 309 Cricklewood Broadway	0.27	Storage	Residential and industrial employment in the B use class	12	An uplift in employment <u>The maximum viable provision of industrial</u> floorspace will be required as part of any redevelopment. MM79

FIGURE 28: MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

Ref.	Address	Size (ha)	Existing Use	Planning Permission	Indicative homes	Comments
16/4174	Peel Precinct	1.14	Residential & Commercial	Residential, health centre, retail & community	308 (252 net)	Permission granted
15/4143	105-109 Salisbury Road	0.1	Office	Residential	19	Prior Approval
18/4071	4-26 Stuart Road / 5-9 Chippenham Gardens	0.24	Residential/ Commercial	Residential	52	Permission granted

5 Places

South West

- 5.7.1 The South West place includes the wards of Alperton, Sudbury and Wembley Central. It is bordered to the south by the London Borough of Ealing and to the west by the London Borough of Harrow. East Lane and Sudbury Court Road forms its northern boundary, while the eastern boundary takes in Wembley town centre right up to Wembley Stadium station.
- 5.7.2 The South West place includes an area which has been subject to neighbourhood planning, in the adopted Sudbury Town ^{MiM96} Neighbourhood Plan. It seeks to create a cleaner, greener, safer Sudbury and upgrade Sudbury Town high street. It also highlights the importance of Vale Farm, designating it as a Local Green Space. It supports recreational, sporting and amenity uses that strengthen the potential for Vale Farm as a regional centre for sporting excellence. Along with the London Plan and Brent Local Plan, the neighbourhood plan contains policies against which planning applications will be considered.

Figure 29 Map of the South West Place

Character & Culture

- 5.7.3 The South West varies significantly in character. It is principally low-rise 'Metroland' suburban streets within Wembley central, Alperton and Sudbury. These contain for the most part detached, semi-detached and terrace houses. There are however two Growth Areas delivering ambitious regeneration in Wembley (which also crosses over into the Central place), centred around the town centre, and Alperton around the underground station and along the Grand Union Canal. The character of these is changing with contemporary developments, often of taller apartment blocks. ^{MiM97}
- 5.7.4 There are several significant open spaces, Barham Park, Vale Farm Local Green Space and King Edward Park found towards the north of this place around Sudbury and Wembley. In addition to this there are several other parks and open spaces in the area including Butler's Green, One Tree Hill Recreation Ground and Alperton Cemetery.
- 5.7.5 This area contains several important cultural and heritage assets including the Shree Sanatan Hindu Mandir on Ealing Road, Crabbs House and the Grade II Listed Gardens in Barham Park. The Grade II* Listed Sudbury Town Station was used as the prototype of Modernist designs for the Piccadilly Line extensions of the early 1930s. Sudbury town itself is home to a number of Grade II Listed buildings and is partly designated as an Archaeological Priority Area.

Transport

- 5.7.6 This area is well served by public transport, with the Piccadilly line passing through Alperton and Sudbury and the Bakerloo line in Wembley. In addition to the underground, Wembley Central station is served by London Overground, Southern and London Northwestern train services. Sudbury and Harrow Road station is served by the Chiltern Line. Public transport accessibility is highest in Wembley town centre.
- 5.7.7 There are bus services that focus on the principal movement corridors of the A404 Harrow and Watford Roads and A4005/A4089 Ealing Road. Although there are strong

public transport links to central London, orbital travel relies on the bus network. This is less reliable, with some congestion issues around Wembley, particularly on event days. Away from the principal movement corridors public transport accessibility is in some places very weak, particularly in some areas of Alperton.

- 5.7.8 The cycle and walking network is principally street based. The Grand Union Canal towpath does however provide a valuable long distance route connecting to inner and outer London through Alperton.

Town Centres

- 5.7.9 There are three town centres; Wembley (part), Sudbury and Ealing Road. Wembley is the largest town centre in Brent. Wembley Central station is located within it, as well as it being a convergence place for many bus services. The retail offer in the part in this place contains some high street names, primarily budget sector, but also a lot of convenience shops that cater for the local population. As with all of Brent’s town centres, although appearing busy, it has struggled with competition from adjacent higher order centres outside the borough. The retail frontage vacancy rate in Wembley remains high at 10%, well over the Brent average of 5%. The town centre is also prominent in terms of employment provision. It accounts for over half of all jobs in town centres in the borough. It contains a number of large hotels due to its good transport links and proximity to the SSE Arena and national stadium.
- 5.7.10 Ealing Road Town Centre stretches from Wembley to Alperton. Its strong Indian culture is reflected in its traders and offer. As with most of Brent’s town centres it performs a valuable local function in terms of small scale ethnic convenience shopping. It does however have a quality offer that is attractive for a wider catchment within Brent and further afield. This is a result of its large number of quality Indian fashion and jewellery shops, particularly important for weddings and cultural events, and also its restaurants.
- 5.7.11 Sudbury is a smaller high street largely comprised of smaller units with the main anchor being a Tesco Express. It essentially meets local needs. Sudbury & Harrow Road ^{MiM99} rail station is located within the town centre boundary, with Sudbury Town tube station located to the south. Sudbury has one of the highest proportions of night-time economy uses (behind only Wembley Park). Its size however means that this offer only addresses local needs.

Employment & Education

- 5.7.12 The South West has a number of large industrial employment areas within the Alperton area. This includes a Strategic Industrial Location along the North Circular Road. In addition, there are some extensive areas of Locally Significant Industrial Sites off the Ealing Road. Wembley historically had a very large office offer, since the 1990s this role has diminished, but it is still an important component of the jobs on offer in the place, together with retailing, hospitality and public sector. The area has a good representation of primary and secondary schools, whilst there are no further education sites.

Challenges	Opportunities
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<ul style="list-style-type: none"> • Wembley and Sudbury town centres have a relatively high vacancy rate in comparison to Brent as a whole • Ealing Road and Sudbury have a high proportion of betting shops on the high street. The proportion in Wembley is also quite high • Permitted development schemes have reduced the effectiveness of Alperton regeneration and can be damaging to public realm • Low PTAL levels in some areas in need of regeneration • Fragmented land ownership complicates comprehensive regeneration strategies for Wembley and Alperton • Permitted residential development is leading to the loss of key industrial sites now regarded as being desirable to retain to support employment • Transport links need to be improved in southeast of the area • Transport and parking issues – knock on effect from Wembley to Sudbury particularly on event days 	<ul style="list-style-type: none"> • Wembley has highest level of employment in Brent • Wembley has a relatively high level of night-time economy uses. This could be tied in with Wembley Park which has the highest level in the borough currently to support the London important night time economy/cultural role of Wembley. • Specialist Indian shops on Ealing Road act as a draw from further afield – promoting this distinctive offer more widely could improve its prospects • Continue planned comprehensive regeneration of Alperton, creating a gateway to the area via new development proposed around Minavil House and Alperton House • Chiltern line services to central London and Oxford could improve transport links from the southwest of this place • Opportunities for proposals that result in the improvement and enhancement of Vale Farm Sports Centre • Large areas of open space, popular and good quality suburban housing around Sudbury providing a high quality of life • Canal improvements provide for recreation, tourism and community’s well-being.
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Figure 30 High Level Plan of the Place More detailed boundaries can be seen on the Policies Map^{MiM98}

Vision

5.7.13 The South West of the borough will be a place which combines its suburban metro-land neighbourhoods with pockets of new development. New high density mixed use development will be focused in the Wembley Growth Area within and adjacent to the

town centre and Alperton Growth Area around the underground station and along the Grand Union Canal. Wembley will continue to be Brent's main town centre and positively adapt to meet the challenges of changes in shopping patterns. The cultural heritage of Ealing Road and the Shree Sanatan Hindu Mandir will be enhanced and promoted to create a specialist retail hub.

POLICY BP7 SOUTH WEST

Proposals should plan positively to deliver the place vision by contributing and where appropriate delivering the following:

Character, Heritage and Design

- a) **Conserving and enhancing heritage assets including the Shree Sanatan Hindu Mandir on Ealing Road and the listed buildings and gardens of Barham Park.**
- b) **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.**
- c) **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.**

Homes

- 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.**
- di) **Delivering a minimum of 245 new homes in the Sudbury Town Neighbourhood Plan area in the period to 2041.**
- e) **Co-locating residential uses on areas of industrial and employment land within the Alperton Growth Area, 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.**

Town Centres

- f) **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.**

- 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 4,300¹ sqm of convenience retail floorspace to 2028, in addition to that already existing and consented.
- h) Promoting uses which enhance and diversify the cultural and commercial leisure offer, particularly those which provide 'family entertainment'.

Employment and Skills

- i) Encouraging the intensification of existing Strategic Industrial Locations and Locally Significant Industrial Sites around Alperton.
- j) Introducing mixed-use development to ~~employment~~ industrial sites around the junction of Ealing Road and Bridgewater Road.
- k) Increasing the supply of workspace in Wembley and Alperton including affordable workspace as set out in Policy BE3 ^{MM80}

Community and Cultural Facilities

- l) Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities.
- m) Providing significant new social infrastructure as part of the Northfields development including a new health centre.
- n) Improvement and enhancement of the Vale Farm and its Sports Centre

Open Space and Biodiversity

- o) Supporting all development with a canalside frontage to create better pedestrian/cycle links along the Grand Union Canal in Alperton
- p) Maintaining and enhancing Barham Park and the listed gardens, creating a well-used public space
- q) Providing high-quality open space as part of major developments, accessible to both new and existing communities

Transport

- r) Supporting permeable development in Alperton that contains pedestrian and cycle routes to easily move through the area, including the creation of an east-west cycle route and pedestrian access along the canal
- s) Prioritising public transport use and associated improvements in the Alperton and Wembley Growth Areas
- t) Supporting a new or enhanced crossing to connect the Northfields Industrial Estate regeneration to new development on both sides of the River Brent and Grand Union canal.

Justification

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

Character, Heritage and Design

- 5.7.14 Much of this area has a strong suburban character dominated by two storey detached and semi-detached homes built during the early 20th century. Tall buildings will be appropriate and concentrated in the major regeneration areas along Wembley High Road and around Alperton Station along the Grand Union Canal towards the former Northfields Industrial Estate. In recent years a number of tall buildings have come forward in these areas to create a new urban character, contributing greatly to Brent's housing needs.
- 5.7.15 Outside these regeneration areas building height will more reflective of the local context. Town centres (~~around 18 metres/6 storeys~~^{MiM100}) and intensification corridors (around 15 metres/5 storeys) will provide the opportunity for some additional height. Elsewhere development will be expected to come forward at levels not significantly higher than existing two and three storey developments.

Homes

- 5.7.16 The majority of new housing in the South West place will take place in Wembley and Alperton Growth Areas. These will provide opportunities for new mixed-use developments which along with residential will also provide a significant amount of employment and other uses to meet community needs. A master planning exercise will be undertaken for the Locally Significant Industrial Sites (LSIS) around Alperton station to identify the appropriate mix of uses and form of development. This will be with a view to improving employment opportunities, whilst also providing for a significant number of additional homes. Given the high capacity for new homes these sites offer, it is likely there will need to be some social infrastructure provided. Master planning will identify these requirements, as has happened at the Northfields where new social infrastructure facilities will also be provided.
- 5.7.17 Prior to the adoption of a masterplan for the LSIS, small-scale development will be resisted. This is to prevent any piecemeal development reducing the potential of the sites that would otherwise be achieved through comprehensive redevelopment.
- 5.7.18 Outside these large-scale regeneration sites there are several smaller development opportunities which could contribute to Brent's housing need. Development of inappropriate town centre uses in Sudbury, plus increased intensity of use of town centre sites and intensification corridors will play an important role. There are also smaller underutilised plots that could contribute without harming the suburban character of Brent.

Town Centres

- 5.7.19 Wembley's role as the principal town centre within Brent will be sustained. Reflecting the need to continue its shopping role, retailing will be predominantly focused on the primary shopping frontage. The role of the centre has been and is likely to continue to evolve due to increased competition from adjacent town centres and online shopping. As such planning applications which seek to enhance and diversify the cultural, commercial leisure and night-time economy offer of Wembley will be considered positively. This is subject to being of an appropriate scale and addressing amenity considerations. In particular, there is scope in terms of needs for Wembley to accommodate 'family entertainment' and leisure facilities such as bowling and climbing walls. These type of activities are a good fit with the existing offer,

potentially enhancing Wembley's catchment. The enhancement of the night-time economy (i.e. late-night restaurants/bars/nightclubs) will be supported subject to issues relating to amenity, licencing and public safety being satisfied.

5.7.20 Active frontages should be maintained but also incorporated into all new development on the principal pedestrian route along Wembley High Road between Wembley and Wembley Park town centres. Where the market may be unlikely to support retailing uses, other uses such as workspace that can provide an active frontage will be sought. An investment in wayfinding and public realm improvements would assist in overcoming the current separation between the 'historic' town centre on the High Road and 'new' centre around the London Designer Outlet. The effective joining of Wembley Park and Wembley' town centres through the development around the stadium, plus the volume of retail, leisure and commercial floorspace creates the potential for Wembley to become a metropolitan centre in future London Plans.

5.7.21 There is no requirement for additional comparison or convenience goods provision within or on the edge of Ealing Road Town centre. Development of an appropriate scale which enhances existing provision and strengthens the role and function of the centre, particularly of its niche Indian focus will be supported. Opportunities to increase links to Wembley town centre given the close functional relationship between the two will be supported. Provision of commercial ground floor uses and active frontages will be sought in proposed development within the intensification corridor between the two.

Employment and Skills

5.7.22 Alperton (South) LSIS land will be protected for solely ~~employment~~ industrial uses within ~~use class B1c, B2, B8 and all closely related sui generis uses~~ research and development/light industrial/general industrial/storage or distribution and where possible its use intensified. **MiM101**

5.7.23 Redevelopment of existing industrial floorspace and provision of new ~~employment~~ industrial floorspace in mixed-use development (co-location) will be accepted in the Growth Area on LSIS around the junction of Ealing Road and Bridgewater Road where set out in site allocations. This will be subject to a comprehensive masterplan approach. Small-scale piecemeal development in advance of the masterplan and that which would compromise maximum efficiency of land use will be resisted. **MiM102**

Community and Cultural Facilities

5.7.24 Due to high levels of population growth from new development in South West there will be a need for significant new community and cultural facilities. A health centre will be provided as part of the Northfields Industrial Estate regeneration scheme. It will be located to the west of the site in order to best meet the needs of new and existing residents.

5.7.25 The Sudbury Town 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.~~ **MM81** The existing leisure centre is coming to

the end of its useful life. It will soon require significant investment to ensure it is fit for purpose in the future. The council supports the ambition of improving Vale Farm. It will explore all options of how this can be achieved within the financial parameters available to it.

Open Space and Biodiversity

- 5.7.26 The north of this place is well-served in terms of open space, with the extensive area of Vale Farm identified as a Local Green Space. This designation is equivalent to Green Belt in national policy in terms of its level of protection. There are however, some areas of deficiency around Alperton and just south of Wembley Central. New development in these Growth Areas should comprehensively plan to deliver significant open space where possible to reduce this deficiency.
- 5.7.27 Within large new developments open space will need to be provided in line with London Plan and Brent borough standards, offering a mix of green space and community meeting space. Existing small open spaces will be protected and where possible enhanced given the deficiency in large open spaces in the south of this place.

Transport

- 5.7.28 The high levels of population growth planned in this area will place additional pressure on the existing transport network. Where possible development will encourage residents to avoid private vehicle use. New cycle and pedestrian routes will be created to improve east-west connections. Redevelopment of sites along the canal offer an excellent opportunity to create new east-west pedestrian and cycle links between Northfields and Alperton station. It will also enhance the canal's role as an important route to Park Royal, Old Oak and Central London.
- 5.7.29 Future upgrades to the Piccadilly and Bakerloo lines will increase capacity and range of this area's transport links. Developments requiring improved public transport accessibility to their sites will be expected to improve the quality of bus services and where appropriate underground stations.

Policy BSWGGA1 Alperton Growth Area

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.

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.

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.** ^{MM82}

5.7.30 Alperton was identified as a Growth Area in the Brent Core Strategy in 2010, with further guidance provided on its development within an associated masterplan supplementary planning document. This sought to capitalise on the relatively good transport connectivity of the area and under-used land. In particular, it wanted to draw out the potential of the canal as a focal point and environmental and recreational asset better integrated with its surroundings. The vision is to transform what is currently a disjointed area cut off from its surroundings into a coherent and attractive place to live, work, shop, study and visit.

5.7.31 Progress in developing the area has been slower than was anticipated in the core strategy, in part due to complicated land ownership and the presence of existing businesses. Nevertheless, over 600 new homes, many of which are affordable, and some employment space has now been delivered along Ealing and Atlip Road, along with commercial space and improvements to the canal's setting. A new bridge and shared cyclepath/footway has also been delivered along the canal. There is now significant developer interest in the area, with a number of planning permissions for major developments recently granted. The redevelopment of Northfields Grand Union which has commenced for approximately ~~2900~~ 3030 new homes plus employment land, social infrastructure and energy centre by St George Homes indicates the confidence in the area's long term potential. ^{MiM103} A redeveloped Alperton Community School has provided a quality school with an internationally recognised teacher award and further form of entry at Secondary level.

5.7.32 In taking forward the Growth Area the council has identified further land currently used inefficiently to be incorporated within its boundary at its western end around Ealing and Bridgewater Roads and at its eastern end to incorporate Northfields (east of the Grand Union), reflective of the recent planning permission for that site. Whilst much of the industrial land in Alperton is of poor quality, there are businesses which are doing well and employing local people. Taking account of much of its use as

either Locally Significant Industrial Site, Local Employment Site and Strategic Industrial Land and Brent's need to provide for additional industrial floorspace ~~provide capacity status for employment land in the London Plan~~, a greater emphasis on employment industrial use in mixed use developments is ~~now sought than was previously the case in allocations.~~ **MiM104** The height of existing buildings and planning permissions mean that taller buildings are considered appropriate at the eastern and western ends. In between the heights are likely to principally be mid-rise.

5.7.33 A sustainable approach to transport is set out which proposes fewer cars and improved connections to public transport supported by the introduction and enhancement of areas of biodiversity and tree planting. Appropriate junction mitigation measures will be expected to be assessed as part of Travel Plans submitted with planning applications. Connections will support pedestrians and cyclists, and improve access for new and existing communities to public transport interchanges, including the Alperton and Stonebridge Park stations. An enhanced bridge link across the River Brent will connect Northfields East of the Grand Union with the North Circular Road and onwards to Park Royal, whilst over the canal links will be increased to Northfields West.

Relevant Policy Documents

Sudbury Town Neighbourhood Plan **MiM105**

Key sites

Alperton Industrial sites

Sainsbury's Alperton

Abbey Industrial Estate

Northfields East of Grand Union **MiM106**

BSWSA1 ALPERTON INDUSTRIAL SITES

<p>Site Plan</p>	<p>The map shows an industrial area in Alperton, Derbyshire. A large area is outlined in red, indicating the site plan. The area contains several large industrial buildings, some labeled 'Alperton Works' and 'Higgin's Garage'. A railway line runs through the site. The surrounding area includes residential streets with blue dots representing houses, and other landmarks like 'Alperton Community Centre' and 'Alperton Church'. The River Trent is visible at the bottom of the map.</p>
<p>Existing Use</p>	<p>Industrial and commercial</p>
<p>Allocated Use</p>	<p>Mixed-use scheme co-locating residential units with existing industrial and commercial uses</p>

Indicative Capacity	1200-1850		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	650-1,059	350-114	200-677
Address	Bridgewater Road and Ealing Road, Alperton		
Area	Alperton House (2.19ha), Bridgewater Road (1.45ha) and Minavil House/Wharfside (1.75ha) – 5.39ha in total		
Description of Existing Site	<ul style="list-style-type: none"> • The allocation area comprises three parcels of industrial land and the site known as Minavil House 16/2629 and Alperton House 18/4199 covered by planning permission. • Land to the west of Bridgewater Road contains various commercial and industrial uses as well as The Boat public house. This site is made up of four land parcels; Alperton House scheme, The Boat, Abercorn Commercial Centre and Jewson. The western most businesses are low rise industrial sheds with associated parking while Alperton house rises to six storeys of office accommodation. • The northern most parcel to the east of Bridgewater Road comprises Alperton Bus Garage, a UKPN substation, low rise industrial units and a car wash. This northern boundary of this site is formed by an adjacent railway line served by the Piccadilly Line, connecting at Alperton Station immediately next to this allocation. • Land to the south of Ealing Road includes the Minavil House scheme and Wharfside industrial units. The Grand Union Canal forms the southern boundary of this site, as well as that of the land to the west of Bridgewater Road. The industrial units which form Wharfside Industrial Estate are generally in better condition than those across the rest of the allocated area. 		
Ownership	Private (multiple ownership)		
Planning History	<ul style="list-style-type: none"> • Approved Application 16/2629 to demolish existing two storey commercial buildings to the south of Ealing Road and replace them with a mixed-use development ranging from 10 to 26 storeys, comprising 251 residential units, 1,942sqm retail foodstore on the ground floor, 622sqm office space on the first floor, 634sqm retail floorspace for flexible use as a café, bar or restaurant at lower ground floor and ground floor level. • Approved Application 18/4199 Alperton House to demolish existing buildings and construction of 4 buildings of 14 to 23 storeys, comprising 474 residential units, mixed commercial use at ground and part 1st floor including a new public house (Use Class A4) 		

	retail floorspace (Use Classes A1, A2, and/or A3), workspace (B1b/c), and an office (B1a), associated public realm and infrastructure improvements.
PTAL Rating	3-5 (current and 2031 estimate)
Planning Considerations	<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 <u>Policy 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 industrial floorspace will be agreed as part of the forthcoming masterplan process. • <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. • 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. <u>Development and its associated should take care to protect this area from any works which would should not</u> compromise its biodiversity and retain . There are a number of mature trees across the sites which should be retained where possible.

	<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>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 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. • 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.
Risks	<ul style="list-style-type: none"> • Land is in multiple ownership, although risk can be mitigated through the production of a comprehensive masterplan for the area. • Industrial units are generally well occupied, therefore development must ensure minimal disruption to existing businesses.
Design Principles	<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 peripheries of the sites where in some cases it is likely that adjacent two storey residential properties will remain. • Alperton Station should be well connected to or integrated into new development, providing a high quality public realm/pedestrian/cyclist environment.

	<ul style="list-style-type: none"> • 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.
Infrastructure Requirements	<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 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>
Justification	<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 <u>industrial</u> 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. • 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. MM83

Existing Use	Supermarket with associated car park and petrol station		
Allocated Use	Replacement/maintain existing superstore with residential on remainder of site		
Indicative Capacity	200		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
			200
Address	360 Ealing Road HA0 1PF		
Area	2.6ha		
Description of Existing Site	The site is currently to the west of a Sainsbury's supermarket with associated retail uses within it, a petrol filling station to the east and store car parking between. It is bounded by the Ealing Road on the east, Glacier Way to the south, industrial premises to the west and a mixture of the Grand Union Canal and residential development to the north.		
Ownership	Private		
Planning History	None of significance to the allocation since the site was built.		
PTAL Rating	4 (<u>current and 2041 estimate</u>)		
Planning Considerations	<ul style="list-style-type: none"> The site is within the Alperton Growth Area with a reasonable level of public transport accessibility <u>providing and consistent with London Plan</u> 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 <u>impacts and detailed</u> consideration of BHC1 towards the significance of the heritage asset and its wider context. Development should provide a detailed analysis and justification of the potential impact of the development on the heritage asset. 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.~~
- 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. This must be retained or enhanced as part of any development and early discussion with TfL London Buses on this should take place.
- 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.

	<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
Risks	Desire of Sainsbury's to develop given the current comparative operational success of the store
Design Principles	<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, <u>Grand Union Canal</u> 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.
Infrastructure Requirements	<ul style="list-style-type: none"> • No specific infrastructure requirements identified beyond <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>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. MM84
Justification	<ul style="list-style-type: none"> • The site is located in a Growth Area with good excellent public transport accessibility levels and will be adjacent to high density development. • The existing use is at low intensity being single storey and surrounded with extensive surface level car parking.

- | | |
|--|---|
| | <ul style="list-style-type: none">• Part of Sainsbury's land has previously been developed for housing. The opportunity exists to intensify use of the identified site to assist meeting housing needs whilst retaining the retail floorspace which serves the local population and improving townscape.• The enhancement of the canal as part of the green chain would be beneficial as it will support additional planting scheme along this edge. |
|--|---|

BSWSA3 ATLIP ROAD

<p>Site Plan</p>	
<p>Existing Use</p>	<p>Commercial/employment use</p>
<p>Allocated Use</p>	<p>Mixed-use residential-led scheme, re-provision of gym, re-providing along Ealing Road the range of town centres uses within the Atlip Centre and also the Church of God Prophecy.</p>

Indicative Capacity	335 450 dwellings		
Timeframe for Delivery	0-5 1-5 Years	5-10 6-10 Years	10+ 11+ Years
	86 110	249 330	
Address	Atlip Road, Alperton, HA0		
Area	1.16ha		
Description of Existing Site	<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>		
Ownership	Private		
Planning History	Approved application 15/2061 for 2 Atlip Road proposed demolition of existing former retail warehouse building and erection of development comprising a part 3 storeys to part 10 storeys building of 99 residential units		
PTAL Rating	3-5 (current and 2031 estimate)		
Planning Considerations	<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. 		


	<ul style="list-style-type: none"> • Given Brent's need to provide for additional industrial floorspace Brent's status as a provide capacity borough, the developer needs to consider provision of workspace. • Located within a Tall Buildings Zone, 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 development must take care to preserve and enhance its heritage value. • 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 <u>and associated works</u> 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 plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.
Risks	Impact on businesses.

<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 BS11 Social Infrastructure and Community Facilities. <u>This should be at least to an equivalent scale/quality in any redevelopment.</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> • <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.

- The site's proximity to Alperton Station make it an excellent location for residential use. **MM85**

BSWSA4 SUNLEIGH ROAD

<p>Site Plan</p>	
<p>Existing Use</p>	<p>Industrial</p>
<p>Allocated Use</p>	<p>Mixed-use residential led development incorporating some replacement <u>workspace industrial</u> at ground floor level and potential commercial leisure use at ground floor level to take advantage of/ enhance the canal setting.</p>
<p>Indicative Capacity</p>	<p>395</p>

Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	198-33	197-165	<u>197</u>
Address	Sunleigh Road, Alperton, HA0		
Area	1.9ha		
Description of Existing Site	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.		
Ownership	Private		
Planning History	<ul style="list-style-type: none"> • 18/0418 Prior approval for change of use from offices (Use class B1(a)) to residential (Use class C3) involving the creation of 23 x studio flats. • 18/0320 Demolition of the existing building and redevelopment of the site with nine dwelling houses comprising a terrace of seven three-storey townhouses (5 x 3 bed and 2 x 4 bed) and two detached bungalows (2 x 2 bed) each with private gardens and associated car parking, landscaping, refuse and bike storage. 		
PTAL Rating	2-3 (<u>current and 2031 estimate</u>)		
Planning Considerations	<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 development should come forward at higher densities in line with neighbouring allocations and the wider Alperton regeneration area.</u> • 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. The site is adjacent to the Grand Union canal and classified under Green Chain and Waterside Development Policy BG11, where management, integration and enhancement of existing green and blue infrastructure are encouraged. 		

- ~~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.~~
- ~~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 massing being delivered with existing residential properties. The site is within a Tall Buildings Zone where tall buildings are appropriate.~~
- 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.
- 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.
- 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.~~

Risks	Impact on businesses, multiple ownership creating piecemeal development.
Design Principles	<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 to make the most effective use of land and secure better development outcomes. • 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 <u>should</u> provides a satisfactory relationship in terms of scale and massing <u>with in relation to existing adjacent residential properties that will remain should be provided.</u> • 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 <u>be provide a publicly accessible landscaped set back from the canal in line with policy BG11 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> • <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> • <u>Vehicular access will be from Sunleigh Road and Woodside End.</u>
Infrastructure Requirements	<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. • 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>

	<ul style="list-style-type: none"> • <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 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>
Justification	<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 <u>industrial</u> use. MM86

BSWSA5 ABBEY INDUSTRIAL ESTATE

Site Plan



Existing Use

Industrial

Allocated Use	Mixed-use residential-led development incorporating replacement- employment <u>industrial</u> space, small scale retailing/commercial leisure and community uses (e.g. nursery).		
Indicative Capacity	590 <u>490</u>		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	300 <u>14</u>	290 <u>286</u>	<u>190</u>
Address	Abbey Industrial Estate, Mount Pleasant, Wembley, HA0 1NR		
Area	2.63ha		
Description of Existing Site	<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. 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. The site is also in the Alperton Housing Zone. The site slopes from the north to the south. 		
Ownership	Private		
Planning History	No relevant planning history		
PTAL Rating	2-3 (<u>current and</u> 2031 estimate)		
Planning Considerations	<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 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.~~
- 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 over one hectare a site specific flood risk assessment will be required.
- ~~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 as other potential uses such as small scale retail, commercial leisure or community uses (e.g. nursery).
- ~~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.~~

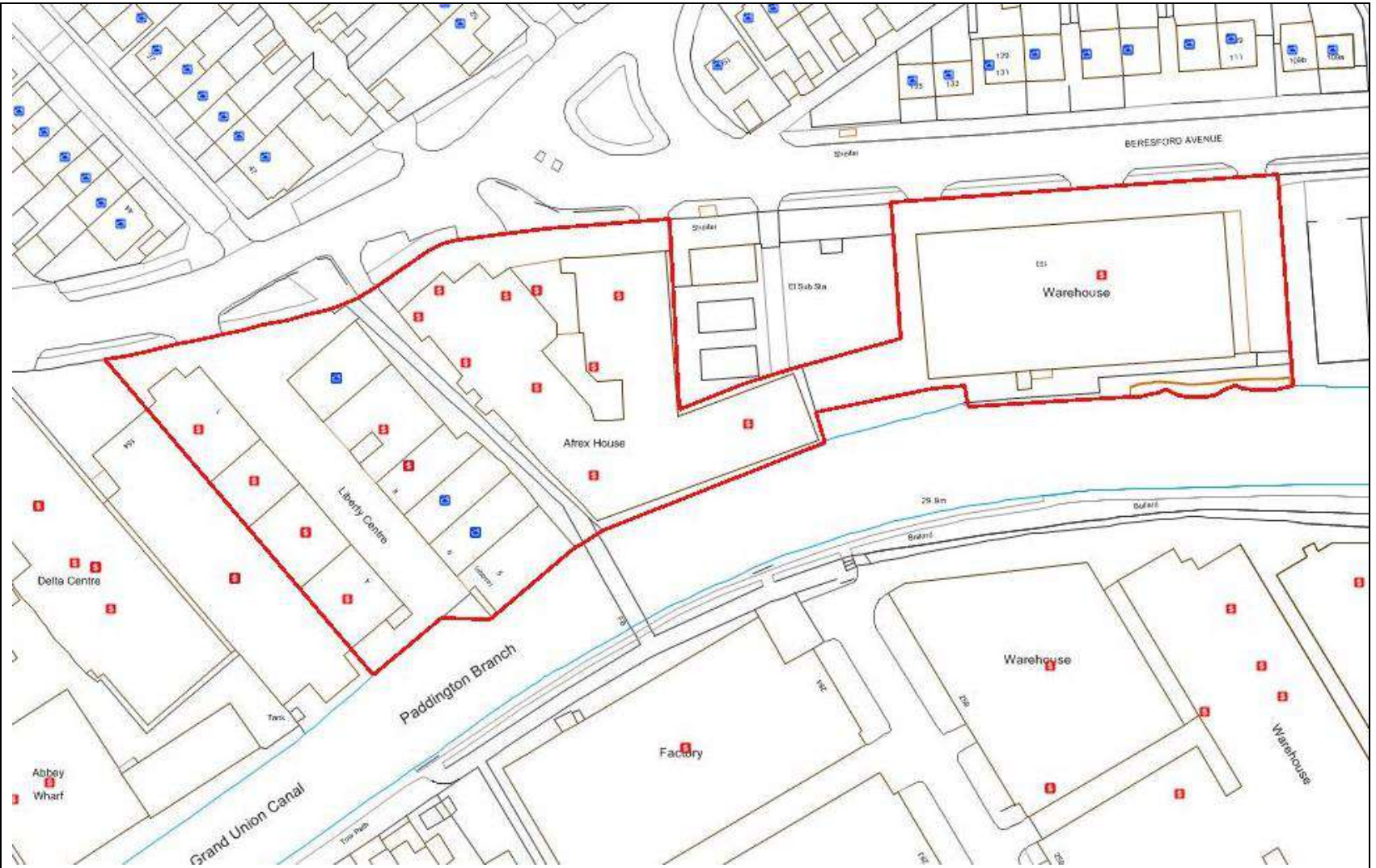
	<ul style="list-style-type: none"> • <u>A Thames Water Sewage Pumping Station is located within the proposed development boundary and this is contrary to best practice set out in Sewers for Adoption (7th edition). The development should make suitable arrangements to address this matter satisfactorily 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>
Risks	Impact on businesses/multiple land owners creating piecemeal development.
Design Principles	<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 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. • 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. • 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

	<p>permeability/connectivity through the site for cyclists and pedestrians in particular, suppressing the desire potential for rat-running of vehicles from adjacent streets/areas.</p> <ul style="list-style-type: none"> • Development should be provide a publicly accessible landscaped set back from the canal in line with policy BG11 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. • Vehicular access will be from Mount Pleasant and Woodside End.
Infrastructure Requirements	<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. • A direct and high quality homezone route that links the site to Atlip Road to create a continuous route from Woodside End through to Mount Pleasant. • 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. • New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity. • Consideration of blue/green and sustainable infrastructure in masterplanning and during 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. • 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. MM87
Justification	<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.

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| | <ul style="list-style-type: none">• 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 residential use. |
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BSWSA6 BERESFORD AVENUE

Site Plan



Existing Use

Industrial

Allocated Use	Mixed-use residential-led development incorporating employment <u>industrial</u> uses.		
Indicative Capacity	135-147		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	135 <u>33</u>	<u>104</u>	
Address	Beresford Avenue, Alperton, HA0		
Area	0.96ha		
Description of Existing Site	<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. 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 		
Ownership	Private		
Planning History	<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. <u>Residential</u> prior approvals in the Liberty Centre 		
PTAL Rating	2 (<u>current and</u> 2031 estimate)		
Planning Considerations	<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. <u>The site is within a Tall Buildings Zone where tall buildings are appropriate.</u> 		

	<ul style="list-style-type: none"> • Given that the site is an existing <u>employment industrial</u> land and <u>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.</u> • 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. • 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.
Risks	Prior approvals and piecemeal development risk efficient land use and access for future development.
Design Principles	<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.

	<ul style="list-style-type: none"> • Flexible light industrial/maker workspace, plus potential <u>retail/commercial, leisure or community A1 or D1</u> uses should be provided at ground floor level. • 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.
Infrastructure Requirements	<ul style="list-style-type: none"> • A publicly accessible <u>east/west walking/cycling route should be provided adjacent to the</u> 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 cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</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> • <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> MM88
Justification	<p>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.</p>

BSWSA7 NORTHFIELDS

<p>Site Plan</p>	<p>The site plan shows an industrial estate bounded by Beresford Avenue to the north, Wycombe Road to the east, and Abbeydale Road to the south. A light blue aqueduct runs through the center of the site. Other streets shown include Highcroft Avenue, Kenmere Gardens, Park Drive, Water Road, and Longley Avenue. The area is labeled 'Northfield Ind Est'. There are also labels for 'laying fields' to the northwest, '37m' and '28m' dimensions, and 'SI' and 'Drain' near the aqueduct.</p>
<p>Existing Use</p>	<p>Mixed use (Industrial with residential under construction)</p>
<p>Allocated Use</p>	<p>Mixed-use residential-led scheme</p>

Indicative Capacity	2900 3,030 new homes		
Timeframe for Delivery	0-5 1-5 Years	5-10 6-10 Years	10+ 11+ Years
	752 400	750 974	1398 2,056
Address	Northfields Industrial Estate, Beresford Avenue, Wembley, HA0 1NW		
Area	9.16ha		
Description of Existing Site	<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 <u>the site</u> 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 <u>(1.06ha)</u> 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 <u>that is not</u> 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 to the site is the Grade II listed "Brent Viaduct" over the North Circular Road. The site comprises brownfield land <u>the majority</u> 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. 		
Ownership	Private		
Planning History	<ul style="list-style-type: none"> Approved <u>hybrid planning permission application 18/0321</u> is a hybrid planning application <u>as amended by permission 19/2732</u> for the comprehensive redevelopment of the <u>former Northfields</u> industrial estate. The scheme proposes demolition of all existing 		

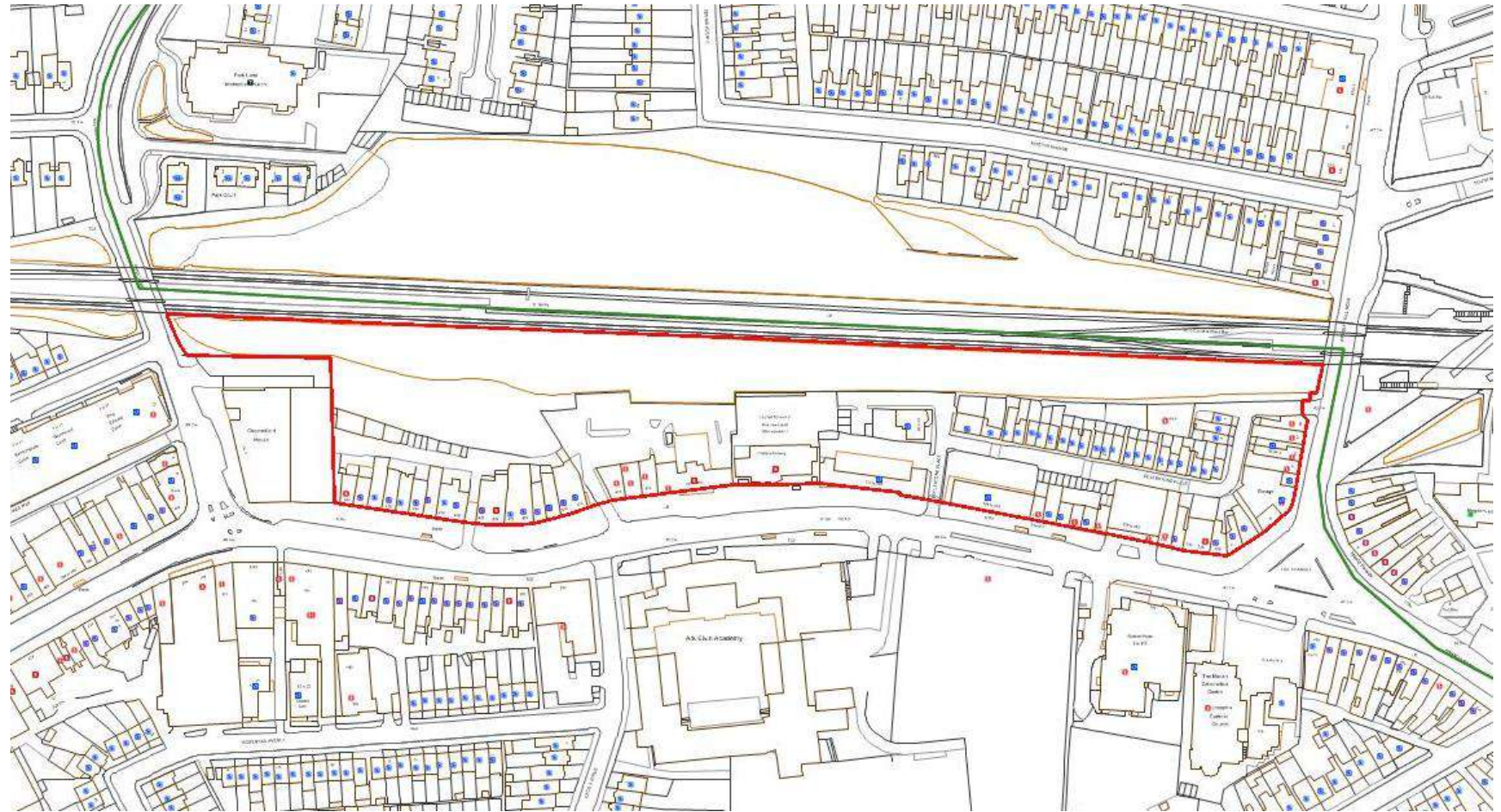
	<p>buildings on site and the delivery of a mixed-use development including 2,900 <u>3,030</u> homes, around 2,300sqm commercial floorspace, a minimum of 17,581sqm and up to 19,000sqm employment floorspace and 1,610sqm community and assembly and leisure floorspace (use classes B1a, B1c and B8), up to 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>
PTAL Rating	0-3 (<u>current and 2031 estimate</u>). May be revised in light of new development
Planning Considerations	<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 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. • 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 the development creating identified additional capacity requirements. • Consistent with planning permission 18/0321 due to the site's historic SIL designation a minimum of 17,581 sq.m. of <u>industrial employment floorspace of the typology and affordability associated with that planning permission</u> must be re-provided as part of

	<p>the development. Due to Brent's <u>identified need classification</u> 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	<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.
Design Principles	<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, <u>and community centre</u>. 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. <u>Tall buildings are appropriate on this site consistent with the heights parameters established by planning permission 18/0321 (as amended by application 19/2732).</u> Given the scale of the site, it can create a new building height character.

<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 walking/cycling routes to mitigate the impact of the development on the surrounding movement network.</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. 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 <u>3030</u> homes, industrial employment floorspace, community, retail and leisure facilities and includes both a health centre and an energy centre. • 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. MM89

BSWSA8 WEMBLEY HIGH ROAD

Site Plan



Existing Use A mixture of retail, residential and commercial uses

Allocated Use Mixed-use residential led development incorporating main town centre uses. Increase in industrial floorspace.

Indicative Capacity	650		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	263 <u>310</u>	160 <u>113</u>	237 <u>227</u>
Address	Wembley High Road, Wembley, HA9		
Area	3ha		
Description of Existing Site	<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. The current site forms the northern side of Wembley High Road between Wembley Triangle <u>to the east</u> and the Chesterfield House development <u>to the west</u>. 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. 		
Ownership	Public and private ownership		
Planning History	Planning <u>permission</u> (application <u>ref.</u> 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.		
PTAL Rating	5-6a (<u>current and 2031 estimate</u>)		
Planning Considerations	<ul style="list-style-type: none"> <u>The site falls within the Tall Building Zone so is appropriate for tall buildings.</u> <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.
- Development close to rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.
- 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.
- 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 the development creating identified additional capacity requirements.~~

Risks	<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. • Sites along the High Road not coming forward may hinder development to the rear.
Design Principles	<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.
Infrastructure Requirements	<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 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> MM90
Justification	<ul style="list-style-type: none"> • The site is located in an area with excellent public transport accessibility levels and will replace the underutilised land with a well-designed, contemporary scheme, contributing towards Brent's housing need. • There is an opportunity for development here to create a greater link between Wembley Central and the new development around the stadium, with an improved active frontage along the High Road.

Allocated Use	Residential-led mixed use, Community facilities		
Indicative Capacity	250		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	250		
Address	Wembley High Road, Wembley, HA9 7DU		
Area	0.84ha		
Description of Existing Site	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 <u>recently developed for</u> 248 new homes with flexible commercial space at ground floor. To the south of the site sits the newly built Ark Elvin Academy, while to the east and west Wembley Park and Wembley town centres are a short walk away.		
Ownership	Public, owned by Brent Council		
Planning History	Previously allocated for development in the Wembley Area Action Plan- <u>None</u>		
PTAL Rating	6a (<u>current and 2031 estimate</u>)		
Planning Considerations	<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 <u>must be created to the along</u> 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 • 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. 		

	<ul style="list-style-type: none"> • 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.
Risks	No significant risks identified
Design Principles	<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>	<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> MM91
<p>Justification</p>	<ul style="list-style-type: none"> • The site is located in an area with excellent public transport accessibility levels and will replace the former school buildings with a well-designed, contemporary scheme, contributing towards Brent's housing need. • There is an opportunity for development here to create a greater link between Wembley Central and the new development around the stadium, with an improved active frontage along the High Road.

BSWA10: BSWSA10 ELM ROAD

Site Plan



1:2500

21 May
2019

0 0.05 0.1 kilometres



Existing Use	Commercial use, hotel, parking, vehicle repair garage, residential, mixed-use residential, employment, church		
Allocated Use	Mixed-use town centre use within town centre boundary, Mixed used residential led development, Hotel and supporting community facilities		
Indicative Capacity	400		
Timeframe for Delivery	0-5 <u>1-5</u> Years	5-10 <u>6-10</u> Years	10+ <u>11+</u> Years
	200	200- 400	
Address	Elm Road, HA9 7JA		
Area	2.98 ha		
Description of Existing Site	<ul style="list-style-type: none"> • Part of the site is within the Wembley town centre boundary comprising of <u>comprises a</u> 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. • 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. 		
Ownership	Private and Public		
Planning History	Permission granted to 1-7, 9, 11 and 11A Elm Road in 2018 for demolition of existing hotel buildings and erection of 5 storey 226 bed aparthotel plus 5-storey basement (18/4063).		
PTAL Rating	PTAL 4-6a (current) <u>increasing to 5-6a by (2031 estimate)</u>		

<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 <u>An active frontage of main town centre uses</u> 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 existing Euro Hotel. The site contains a church and any future development <u>of this must</u> take care to provide accessible <u>replacement</u> 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 <u>employment maximum viable industrial floorspace use</u> should be re-provided <u>through a net increase in employment industrial floor space.</u> • 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>Risks</p>	<p>Impact on infrastructure and wildlife corridor, business relocation, edge of town centre, multiple land owners.</p>
<p></p>	

<p>Design Principles</p>	<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 and reflect the character of the area. 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 pubic 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. • <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 <u>excellent PTAL</u> and its <u>close proximity to Wembley Central Station, bus routes and High Road</u> make it a good location for residential and employment use. MM92

FIGURE 31 OTHER SITE ALLOCATIONS

Ref.	Address	Size (ha)	Existing Use	Allocated Use	Indicative homes	Comments
BSWSA 11	Wembley Cutting North, Mostyn Road	0.2	Railway land	Residential	15	Part of Former WAAP W4, so principle of development considered acceptable. Suburban scale development. MM93
BSWSA 12	Keelers Service Centre, Harrow Road, Wembley, HA0 2LL	0.07	MOT Test Centre	Residential/commercial/employment (Business Use Class)	24 22	Ground floor <u>commercial</u> /employment-use maximised, with upper storeys residential MM93
BSWSA 13	Wembley Police & Fire Stations Harrow Road and Wembley Community Hospital/Chaplin Road Health Centre	3.9	Police, fire and health facilities	Existing police, fire and health facilities retained/reconfigured, opportunities for other community uses considered and residential on any surplus land	Unknown at this stage	Potential One Public Estate Site Reconfiguration. Site inefficient due to piecemeal development/old building stock. Existing uses to be retained/improved buildings potentially realising residential site.
BSWSA 14	Sudbury Town Station car park	0.22	Car park	Residential	30	Development should protect and enhance the setting of the Grade II* listed Sudbury

Ref.	Address	Size (ha)	Existing Use	Allocated Use	Indicative homes	Comments
						Station. Suitable levels of replacement car parking for disabled station users must be retained.
BSWSA 15	Employment Land on Heather Park Drive	0.5	Business and office space	Residential/ employment <u>industrial</u> use	28 <u>36</u>	Mixed use residential with maximum replacement employment <u>light industrial, general industrial or storage and distribution</u> floorspace. MM93
BSWSA16	Carphone Warehouse 416 Ealing Road	0.5	Retail warehouse	Mixed use retail/commercial/commu nity and residential	80 <u>120</u> MM93	Loss of majority of retail acceptable. Some replacement to serve local area sought/active ground floor frontages particularly along Ealing Road.
BSWSA 17	Former Wembley Youth Centre/Dennis Jackson Centre London Road HA9 7EU	0.96	Vacant Youth & Community Centre	Residential with community use	150 <u>170</u> MM93	Re-provision of approx. 350 sq.m. of community required

FIGURE 32 MAJOR SITES WITH PLANNING PERMISSION FOR HOUSING

Ref.	Address	Existing Use	Permission Uses	Indicative homes	Comments
17/1104	253a Ealing Road, HA0 1HH	Industrial	Residential	20	Not started MiM107
15/3950	1C Carlyon Road, HA0 1HP	NA	Residential	28	On site MiM108
16/3606	245-249 Ealing Road, HA0 1EX	Public House/Industrial	Residential/community/public	92	Not started
15/2061	2 Atlip Road, Wembley, HA0 4LU	Warehouse	Residential	99	Not started MiM109
16/4478	All Units at Abbey Wharf & Delta Centre and All of 152, Mount Pleasant, Wembley, HA0	Industrial	Residential	135	On site MiM110
16/4156	Heron House, 109-115 Wembley Hill Road, Wembley HA9 8DA	Office	Mixed use residential led	40	Prior approval started MiM111
15/4550	Chesterfield House, Wembley High Road	NA	Residential/Commercial	239	On site MiM112
15/4743	Brent House	NA	Residential/Commercial	248	On site MiM113
16/1698	Cottrell House, 53-63 Wembley Hill Road HA9	-	Residential/Commercial	55	On site MiM114

6 Themes

6.1 Design

Where we are?

- 6.1.1 Brent is a great place to live, work and visit. The combination of the borough's rich culture and the diversity of its people have evolved into a number of distinctive places and neighbourhoods which give Brent its unique character. This local distinctiveness should be harnessed and reinforced through new development.
- 6.1.2 What makes each place distinctive and unique is set out in more detail in the individual Place chapters. In summary, the borough's character can be split into two – north and south of the North Circular Road. The south has a diverse community and history which is reflected in its buildings and attractions. It was largely developed between 1890 and 1910, characterised by Edwardian and Victorian terraced houses for workers in industry and services as well as small number of estates of larger houses around Kilburn. Typically, densities are higher with residential and non-residential uses more likely to be mixed together.
- 6.1.3 The north was predominantly built out in the 1920s and 1930s as 'metroland' where rapid expansion occurred as a result of the opening of rail and tube stations in the surrounding areas. Compared to the south, the area was essentially of a lower density residential suburban nature, and has greater segregation of land uses, planned more around movement by car with more generous incidental open space, tree planting and parks and open spaces. Some areas within the north contain a number of homes by the architect Ernest Trobridge (1920s-30s), ranging from thatched cottages to flats/ houses with distinctive castle features and crosses.
- 6.1.4 As across much of London, the council has more recently placed a greater emphasis on high quality design in recognition of the value that it creates in improving quality of life and successful places to live. Good design encourages civic pride and can discourage crime. It can also help attract investment lead to healthier lives and mitigate the impacts of climate change.
- 6.1.5 In response to this, the council has updated its design guidance, provided better design advice in masterplans and requires the use of a design review panel on major developments. It has also led by example on developments such as the award winning regeneration of South Kilburn. This has sought to improve housing quality and standards, providing accessible and inclusive high quality design in a high quality public realm.

Where do we want to be?

- 6.1.6 The National Planning Policy Framework sets out the importance of good design in planning. The council is committed to design excellence and achieving high quality, sustainable development. It will require a high quality of design for all buildings and spaces in the borough and work towards making Brent a healthier and an even more attractive place to live, work and visit. This includes preserving and where possible enhancing heritage assets alongside the provision of well designed, innovative and modern buildings. Development should be mindful of and sympathetic to the character of the borough, but also able to create new places which reflect current times and needs, and which are fit for the future.

- 6.1.7 The council is committed to securing a high-quality built environment and wishes to secure excellent contemporary architecture and design which is inspired by and reinforces Brent's unique local distinctiveness. This includes the contribution made by the historic environment and Brent's diverse communities. Irrespective of their architectural style, new buildings should be attractive and interesting, enrich their localities and improve the quality of people's every day experiences.
- 6.1.8 Brent has ambitions to grow, this includes accommodating significant housing and economic growth. This is necessary to support Brent's continued prosperity and that of wider London as a leading world city. The spatial strategy seeks to concentrate new development in focused areas. This provides an opportunity to create new communities that have a different character to the typically suburban character that has historically endured, including tall buildings and modern innovatively designed neighbourhoods. The ambition is that these will be recognised as quality places to live in the future and will knit into their surrounding context.
- 6.1.9 The London Plan has very detailed design policies that comprehensively address many of the strategic and development management policies that existed in Brent's previous Local Plan documents and those which might also have been missing. It is policies will in the majority of cases work well for Brent in managing the design quality of developments. These policies are referenced below.
- 6.1.10 As such the council's focus will be on addressing issues which London Plan policies place requirements on us to tackle, as set out in this chapter, but also through more detailed advice in Supplementary Planning Documents (SPD). Some of these documents have already been adopted, others will be produced and more detail will also apply in some site allocations policies. These references will highlight the characteristics of existing areas that need to be respected, such as conservation area assessments, or set out the key design principles of what development should be expected to achieve, e.g. through site specific masterplans or where more detailed specific advice might be required such as in design codes. Appendix 2 sets out how the council's SPD1 principles relate to London Plan design policies. Notwithstanding the above, an overarching policy committed to delivering the highest design quality across the borough is also included in this local plan.

LONDON PLAN

Policy D1 London's Form, Character and Capacity for Growth

Policy D4A2 Infrastructure Requirements for Sustainable Densities

Policy D4b3 Optimising site capacity through a design led approach

Policy D24 Delivering Good Design

Policy D35 Inclusive Design

Policy D46 Housing Quality and Standards

Policy D57 Accessible Housing

Policy D78 Public Realm

Policy D9 Tall Buildings

Policy D101 Safety, security and resilience to emergency

Policy D14~~2~~ Fire Safety

Policy D12~~3~~ Agent of Change

Policy D13~~4~~ Noise^{MiM115}

Brent Supplementary Planning Documents

SPD1 Brent Design Guide

SPD2 Residential Extensions Guide

SPD3 Shopfront Design Guide

Conservation Area Appraisals/Design Guides

POLICY BD1: LEADING THE WAY IN GOOD URBAN DESIGN

All new development must be of the highest architectural and urban design quality. Innovative contemporary design will be supported where it respects and complements historic character but is also fit for the future. In delivering high quality design, development proposals will be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1.

Justification

- 6.1.11 The council is committed to delivering excellence in development quality. It expects all new development to embrace the principles of good design, and positively respond to the character of Brent's places.
- 6.1.12 The policy seeks to create buildings and places of high quality that will be appreciated by future generations. High quality design is both visually interesting and attractive and should enhance local character. Good design is not just about what things look like, it is also about how places function and how individual buildings and the spaces around them contribute to the public realm and community well-being. The design of the places and buildings that make up our local environment affects everyone and the quality of life. Good design makes places that put people first, promote health and are welcoming, feel safe, are enjoyable and easy to use for everyone. The council will continue to use advice from the Brent Design Review Panel to inform the decision making process.

POLICY BD2: TALL BUILDINGS

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

- 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~~ identifies that the Brent Local Plan ~~to~~ should 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.
- 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.~~
- 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. 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. 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.

- 6.1.16 Within the areas identified there should be variety in heights to add to visual interest to the skyline. Whilst there will need to be a progressive stepping down of buildings to the edge of the tall buildings zone, 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. 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.
- 6.1.17 In town centres (~~outside conservation areas and areas of distinctive character~~) and intensification corridors outside conservation areas and areas of distinctive residential character, to support increased density to deliver a significant number of new 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 (typically, but not exclusively 22.5 metres) and space/relationship with properties to the rear 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.
- 6.1.18 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 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.
- 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.~~
- 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.

- 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 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.
- 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, D3, D24, and D46 (incl. Table 3.2) and D6 formed 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:
- a) Visual impacts:
 - 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
 - No adverse reflected glare
 - b) Functional Impacts:
 - 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:
 - Wind, daylight, sunlight and temperature conditions
 - Support air movement
 - Noise
 - d) Cumulative Impacts:

- Combined impacts of numerous buildings in one place

LONDON PLAN

D1 London's Form, Character and Capacity for Growth

Policy D4A2 Infrastructure Requirements for Sustainable Densities

Policy D4b3 Optimising Site Capacity Through a Design Led Approach

Policy D24 Delivering Good Design

Policy D89 Tall Buildings ^{MM94}

BRENT

Brent Tall Building Strategy

Brent Design Guide SPD1

POLICY BD3: BASEMENT DEVELOPMENT

Proposals for basement development of an existing property must:

- Demonstrate that sustainable design standards are integral to the proposal, including its construction and operation**
- In the case of habitable development only be ancillary accommodation to a dwelling above**
- Be no wider than the original building**
- Extend no further than the existing front elevation, 3 metres to the rear and 1 storey down (4 metres floor to ceiling height for a detached property or 3m in other cases)**
- Ensure any rooflights are flush with the ground and close to the main building**
- 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.**
- Be protected from sewer flooding by a suitable pumped device** ^{MM95}

Justification

6.1.23 London Plan Policy D910 Basements development ^{MiM116} requires the council to establish a policy to address the negative impacts of large-scale basement development below existing buildings. Basement applications have increased in Brent, particularly to the south where property prices are generally higher. The extensive excavation to create basement space, plus necessary structural works for buildings above and plots adjacent can mean extended periods of works are required. Many aspects of concerns raised by residents about basements are controlled by regimes outside the planning system. Brent has produced a Basement Supplementary Planning Document to identify to applicants and those surrounding about the planning and non-planning issues that need to be addressed.

6.1.24 The policy focuses on controlling the size, use and the environmental impacts of basements. This is to ensure that from a planning perspective they provide an acceptable accommodation solution for their occupants and do not significantly adversely impact on the character of an area and the amenity of neighbours.

LONDON PLAN

D910 Basements development^{MiM117}

HC1 Heritage conservation and growth

Brent Local Plan

DMP1 Development Management General Principles

Basements Supplementary Planning Document

6 Themes

6.2 Housing

Where we are?

- 6.2.1 Brent, as is the case for the rest of London, has a large unfulfilled need for additional homes. There is a significant difference between needs and the supply of the right type of homes at the right price. This means that there are significant affordability issues for renters and buyers. House prices rose by 22% in the last 5 years (2014-2019)¹, whilst rents increased 20%², with house prices at over 16 times local incomes³. Inability to afford the right home has contributed to a 24% increase in overcrowded homes to some of the highest levels in England.⁴
- 6.2.2 Delivery of additional homes in Brent has been good in comparison to many parts of London. This is both in overall numbers and amounts of affordable (7th highest⁵). Brent's annual minimum London Plan housing target has been amended from 1,065 in the period to 2014/15, to 1,525 in the period from 2015/16. The ~~draft~~ London Plan increases it to ~~2,915~~ 2,350^{MiM118} from 2019/20.
- 6.2.3 833 additional affordable dwellings have been delivered in the last 3 years (2016/17-2018/19), 2,907 market dwellings, plus 1,097 institutional dwellings⁶ (mostly student accommodation). This is 262 dwellings more than its London Plan targets, albeit student accommodation was a significant component of delivery.
- 6.2.4 The council has a long-standing target of 50% of new homes needing to be affordable. In comparison to other London boroughs, performance has been good, but it has not achieved 50% overall. Although house prices have risen significantly, the affordable percentage delivered has fallen since 2010. This is principally for two reasons: the effects of changes to national and London Plan policy; and funding reductions for registered providers (such as housing associations). National policy places a significant amount of emphasis on the viability of development needing to be maintained. Affordable housing requirements have to be flexible to ensure viability. The London Plan sought to maximise affordable housing provision but did not have a specific affordable housing target. Viability is tested through an assessment process that has been subject to much criticism of its complexity and ability to be scrutinised by the public.
- 6.2.5 The Mayor through changes to the London Plan has sought to overcome this. This is by being specific about affordable housing targets, acceptable inputs into the viability modelling and the need for greater transparency. A strategic target for London is now 50%; in the interim for most sites to be delivered by private developers the London Plan's default position is that a minimum of 35% that meets a borough's tenure split and meets all other Plan requirements will be acceptable without the need for viability analysis.

¹ Land Registry UK House Price Index

² VOA Average Private Rents (Median) to 09/2018

³ ONS House Price to workplace-based earnings ratio Mar 2019

⁴ ORS Brent SHMA 2018

⁵ London Plan AMR 14 2016-17 for average over 2014-15 to 2016-17

⁶ Brent AMR 2016-17-2018-19 and MHCLG Live Tables 123 and 124

Housing needs – market and affordable

- 6.2.6 The Brent Strategic Housing Market Assessment 2018 (SHMA) identified a need for approximately 48,000 additional homes between 2016-2041. 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 884 dwellings per annum (19,448 homes over the Plan period) or 46% of that need. 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.^{MM96} This does not include people who currently live in private rented 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.
- 6.2.7 Government has recently redefined affordable housing needs to include people who can afford to rent, but not to buy. This was done after the council had completed its most recent assessment. As such, there is currently no detailed Brent study on this aspect of need. A rough estimate can be used by assuming that most people who rent would, if circumstances allowed, want to buy. This could comprise up to 14% or 17,400 of households (this represents the difference between owner occupation rates in 1991 (highest) and 2011). If this backlog was to be met over the period to 2041 this would mean that 82% of new homes identified in the SHMA for Brent would need to be affordable.
- 6.2.8 Government has also identified a new Local Housing Need target methodology for plan making purposes. For Brent in 2019 this would be an annual target of 3,537 dwellings per annum. National policy allows for a stepping up to achieve this target albeit in a very short period from what would be an initial target of 2,135. The Government's methodology is consistent with its aim to provide 300,000 additional homes per year. London's contribution to this is 77,000. As such in the short to medium term the council does not anticipate any move away from higher level targets which will be set out in future London Plans requiring Brent to provide significantly more housing than in the period to 2014/15. This local plan seeks to positively address this likely long term challenge.

Housing needs – dwelling sizes

- 6.2.9 For Brent needs the majority of size of homes required is for family dwellings of 3 bedrooms or more (53.8%), with 16.5% 1 bed and 29.8% 2 bed. Market housing requirement for family dwellings (16,900) was well above needs identified for affordable dwellings of this size (8,900).
- 6.2.10 In terms of household size composition, there will be an additional 11,800 single persons, 16,900 of two adults without children and 10,800 others (multi-generational or living in shared housing), whilst the number of couples with children is expected to drop by 100.

Housing Needs – Build to Rent

6.2.11 Over the last 5 years there has been an increase in institutions seeking to deliver large purpose built residential developments for rent. Quintain, the majority landowner of Wembley Park, is now concentrating on this tenure for 5,000 homes. Government and the Mayor are keen on this type of development; it provides potential to accelerate housing delivery as another source of capacity. The council has also been positive about it for these aspects, but also because of the quality of the homes/ services provided. National and London Plan policy encourages boroughs to support further build for rent schemes. Private rented accommodation is expected to provide at least 30% of new homes (this would reflect current tenure splits across the borough). If however, trends in tenure change since 2001 continue, it is possible that more than 50% of additional homes will be private rented.

Housing Needs – Houses in Multiple Occupation

6.2.12 The cost, limited availability of housing and flexibility of development rights has resulted in many Brent homes becoming houses in multiple occupation (HMO); properties shared by two or more households. ~~Whilst they do~~ Where such accommodation is purpose built, well managed and high quality it provides a valuable role in meeting housing need and will be supported. However where this is not the case their concentration can sometimes have adverse impacts on neighbours. This includes; poor maintenance of properties and waste management, overcrowding, increased anti-social behaviour, pressure on parking and other social infrastructure. HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families. ^{MiM119} Increased permitted development rights together with lack of housing licensing requirements for smaller HMOs until quite recently has resulted in the council having a limited ability to address this matter. There are now approximately 16,000 HMOs in Brent.

6.2.13 The council has introduced licensing for all HMOs with 3 or more people forming two or more households. These changes point to likely greater control of quality outside of planning, helping to reduce potential for adverse impact on neighbours and tenants. Nevertheless, the council is likely to go through the process of removing permitted development rights for change of use to HMOs to come into effect in ~~2020~~2022. ^{MiM120}

Housing needs – self and custom build

6.2.14 Government and the Mayor are keen to diversify how and who delivers new homes. Self and custom build or alternative community type home building is supported. It is seen as a potential key component of additional delivery. The council has a statutory duty to support self and custom build. It maintains a register of those interested and should plan to meet needs. Interest in Brent appears limited in terms of registrations (76 in 2 years) and build out (33 CIL relief claims in 5 years). The council also has to maintain a brownfield register. This helps identify opportunities for self and custom build homes. The supply of self and custom build plots is typically very small scale, usually infill between existing dwellings, or in rear gardens. In other countries however, groups of self-builders come together to deliver larger schemes such as blocks of flats. To date no sites have been specifically identified in the Local Plan for self and custom build.

6.2.15 Typically, around 260 new homes per year have been delivered on small sites (defined as sites less than ~~25 dwellings or 2,500 sqm~~ 0.25 hectares 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~~ 433 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~~ indicate this will be a challenging target. 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.^{MM96}

Housing needs – Specialist older people's housing

6.2.16 Currently there are approximately 1,400 specialist dwellings for older people in the borough. Examples include sheltered housing or homes with independent residents receiving greater levels of care, but not nursing homes. The majority of older people do and are likely to continue to live in their own home until the end of their lives. It is anticipated that the doubling of 75 year olds in particular will require additional specialist older people's dwellings. 4,400 specialist older people's dwellings will be required, graded across a variety of care interventions, for example Extracare retirement villages. The ~~draft~~ London Plan sets a benchmark target figure^{MiM121} for Brent of 230 additional homes per year.

6.2.17 There are many people living in residential institutions in Brent, e.g. nursing homes. The growth in older people in particular will mean a rise in the institutional population to around 3,300. Depending on care models, this may mean a greater need for additional capacity in such institutions, or alternatively more homes (normal and specialist) not accounted for in the 48,000 additional homes.

Housing needs – Student accommodation

6.2.18 London as a whole has a deficit of purpose built student accommodation. Wembley in particular has proven attractive for investors. It has relatively swift direct connections to central London. It also allows for a scale of building that supports the sector's preference for modular building techniques. To date over 2,400 student bed spaces have been built. Another 2,400 have consent. With the likely further higher^{MiM122} education sector expansion proposed, accommodation needs are increasing. The London Plan supports further provision in outer London boroughs. Therefore additional student accommodation in Brent is likely.

Housing Needs – Other specialist accommodation

6.2.19 Although the main categories of residential accommodation have been identified, there are other forms of specialist accommodation. These historically might have been provided as residential institutions. Models of care have changed with social inclusion being a priority to provide better integration with existing communities. Many now prefer to occupy existing dwellings modified to meet needs. The council currently supports this approach in planning policy. This is when accommodation is close to amenities and public transport, there is no overconcentration of such uses and suitable management can be shown.

Housing needs - Gypsies and travellers and travelling showpeople

- 6.2.20 Brent has one dedicated Gypsy and Traveller site at Lynton Close. This is owned by the council. National planning policy on meeting Gypsy and Traveller needs has undergone a series of radical changes over the last decade, the most recent being a change in definitions. To qualify, households now have to move around on a sustained basis annually. ~~The draft London Plan definition includes more qualifying criteria.~~ MiM123
- 6.2.21 The council with other West London boroughs undertook a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment in 2018. ~~This used both definitions.~~ The national definition used identified no additional pitch needs. Indeed Lynton Road Close occupiers are not defined as Gypsies or Travellers for planning purposes due to their limited travelling. More recent work by the Council in assessing the quality of accommodation available at the Lynton Close site indicates the need for significant on-site improvements. If these cannot be achieved potentially an alternative site might need to be identified to meet all current occupants' accommodation needs. Using the alternative London Plan definition, a minimum of 90 additional pitches are required. Assuming traditional levels of density of accommodation this would indicate the need for nearly 3 hectares of additional sites. This would translate into the need for three or more sites, depending on their size. MiM124
- 6.2.22 Brent currently does not have any sites for travelling showpeople. No additional sites were identified in the Accommodation Assessment as being required for Brent.

Quality of housing development

- 6.2.23 London Plan policies seek to lift the quality of new homes by setting size and accessibility requirements, such as 10% homes being wheelchair accessible/ easily adaptable and nearly all homes having step free access. They require high quality design, including on site amenity space and energy efficiency measures. To supplement these policies there are also numerous Supplementary Planning Guidance documents.

Where do we want to be?

- 6.2.24 The council recognises that the largest issue facing it and the borough is the lack of sufficient homes to meet needs. As such it wants to maximise the amount of homes that can be delivered, with truly affordable homes being especially important, to meet the needs principally derived from its residents. It also recognises as a constituent part of the London housing market that it has a role in meeting wider general needs, as well as some specialist needs such as students. As such in taking forward the Plan it seeks to maximise what can be provided, but as would be expected by its community, primarily focus on Brent's needs. It will seek to meet the range of identified needs in high quality developments to create balanced and mixed communities.
- 6.2.25 The council does have an arms-length housing company I4B which may develop in the future. It also has a programme to develop on its own estates. Nevertheless, in the context of overall delivery required it currently has very limited ability to directly impact on delivery rates as a builder of homes. Private developers and housing associations are the main deliverers. The council has sought to identify as many sites as possible for housing and with the exception of very few sites has included all those

put forward by developers/ landowners. It has set ambitious, challenging but achievable targets, not unobtainable ones as the council has very limited ability to directly impact on delivery rates as a builder of homes.

- 6.2.26 To do otherwise will, as a result of current national policy, potentially result in Brent's new Local Plan policies being over-ridden by the Housing Delivery Test and presumption in favour of sustainable development. This would not serve the community well. It may mean housing development being allowed in areas, or of such a design, which the council and communities would otherwise find unacceptable, undermining other Local Plan objectives. The council will continue to ensure that the number of planning permissions for new homes significantly outweighs the annual supply. Over the last decade, on average the number of homes with planning permission at year end has been 7 times that which is built.
- 6.2.27 It will also where possible seek to provide greater certainty in relation to planning on where and how specialist housing needs can be met. It is anticipated that this will primarily be related to Growth Areas and larger sites where there is scope to provide a greater diversity of housing as part of mixed communities.

LONDON PLAN

Policy H1 Increasing housing supply

Policy H2 Small sites

~~Policy H3 Monitoring housing targets~~

Policy H4~~3~~ Meanwhile use

Policy H5~~4~~ Delivering affordable housing

Policy H6~~5~~ Threshold approach to applications

Policy H7~~6~~ Affordable housing tenure

Policy H8~~7~~ Monitoring of affordable housing

~~Policy H9 Vacant building credit~~

Policy H10~~8~~ ~~Redevelopment~~ Loss of existing housing and estate ~~regeneration~~ redevelopment

Policy H11~~9~~ Ensuring the best use of stock

Policy H12~~10~~ Housing size mix

Policy H13~~11~~ Build to Rent

Policy H14~~12~~ Supported and specialised accommodation

Policy H15~~13~~ Specialist older persons housing

Policy H16~~14~~ Gypsy and Traveller accommodation

Policy H17~~15~~ Purpose-built student accommodation

Policy H18~~16~~^{MiM125} Large-scale purpose-built shared living

POLICY: BH1 INCREASING HOUSING SUPPLY IN BRENT

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.^{MM97}

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.

Justification

- 6.2.28 The London Plan housing target is related to the needs of the borough, but also wider London. It reflects the identified capacity for homes on sites that the GLA considers will become available. The Plan has sought to provide as much certainty as it can from a planning policy perspective on how it will try to meet the overall target to 2029. It has also sought to look to the period to 2041 and potentially beyond on some sites. This will produce better planning outcomes, bringing greater certainty to where future homes and jobs are likely to be located and encourage their timely delivery as many of the larger sites can take a significant amount of time from their identification to implementation.
- 6.2.29 Wherever it can the Local Plan seeks to identify specific sites on which new homes will be delivered. The spatial strategy focuses the majority of development in Growth Areas. Five of these have been taken forward from the previous Local Plan with additional capacity identified within their existing boundaries and in some cases through their extension. In addition, three new Growth Areas, including two taking advantage of better connectivity provided by new rail stations, have been identified.
- 6.2.30 Within the Place chapters, site specific allocations with more detailed policies are shown. The Plan also allocates sites with an indicative housing target but no site specific policy, which will be developed in accordance within the development plan. In addition, an assessment has been made of the likely delivery from 'windfall' small sites, which is sites of less than 25 dwellings/ 0.25 hectare. There are also sites with extant planning permissions, some of which might have started which will contribute to the target.
- 6.2.31 All these sources are listed in the Brent Housing Trajectory, updated on an annual basis. History tells us that there are likely to be large sites not yet identified in the Plan that will be subject to planning applications for housing development. No explicit assumption of the likely number of homes that they will deliver has been included in this Plan. Nevertheless, where they accord with policies in the development plan they will be given planning permission and contribute towards the target. These will assist in helping provide more certainty of getting closer to or ideally exceeding Brent's London Plan target of 29,150 a minimum of 23,250^{MiM126} dwellings in the period to 2028/29.
- 6.2.32 National policy requires that assessment of^{MiM127} both the potential to achieve the Local Plan housing target and its actual delivery is undertaken on an annual basis. The council has to demonstrate in the future a five-year supply of deliverable housing

sites. In looking back the Housing Delivery Test assesses the previous 3 years' delivery. Should there be failure against either of these assessments, then there are potentially significant consequences. At its extreme there is the possibility for local policy to be over-ridden by national policy when determining planning applications. This could lead to outcomes which neither the council nor Brent residents/businesses support. As such the council will endeavour to undertake the necessary actions to ensure that it can achieve the required number of homes, including supporting delivery of homes on its own land portfolio such as estates.

LONDON PLAN

Policy H1 Increasing housing supply

Policy H2 Small sites

Policy H2A Small Housing Developments^{MiM128}

POLICY: BH2 PRIORITY AREAS FOR ADDITIONAL HOUSING PROVISION WITHIN BRENT

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);^{MM98}**
- 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

6.2.33 In addition to the Growth Areas and Site Allocations in the Plan, consistent with national and London Plan policy, town centres and areas with higher levels of public transport accessibility, some of which the Council has also identified as intensification corridors with the potential for increased building heights to encourage small sites windfall residential development, are priority areas for the provision of the additional homes required. The intensification corridors have been identified not only on the basis of their public transport accessibility (PTAL3 or above) but also their capacity in terms of their existing character (taking account of matters including current built form, width of roads and relationships with adjoining buildings), accessibility to social infrastructure and environmental factors related to providing an acceptable residential environment. Where these priority areas for additional homes^{MiM129} are adjacent or along the borough boundary, the council will work with adjoining boroughs and the OPDC to identify consistency of approach to development and infrastructure that might be required to serve areas that straddle boundaries. As well as meeting housing needs, it is recognised that additional homes and their residents can bring other benefits to areas, such as their regeneration, or in the case of town centres, bring additional activity to an area. Nevertheless, non-residential uses can

also play an important role in an area. They can add to the vitality and viability of these places and in meeting employment and other needs of the population, businesses and other groups. Residential development tends to be a higher monetary value use that can displace other not so financially valuable uses.

- 6.2.34 Whilst it is a priority to meet housing needs, the provision of residential should not necessarily be at the expense of these other uses. This is particularly so where there is an identified need, or reasonable prospect that non-residential floorspace will be used for its intended purpose. Many uses within these areas may be protected or their re-provision required by other policies in the Plan, e.g. ground floor uses in primary shopping frontages, employment or community uses, but some will not be. As such this policy seeks to protect existing uses where appropriate.
- 6.2.35 Nevertheless, there is a balance that needs to be struck. Whilst the council wishes to promote mixed use environments, there have been cases where it has previously sought ground floor commercial uses along main streets which subsequently have remained vacant for some time. Some of this is related to the capital cost for an occupier of bringing the space up to a standard that can meet their needs. As such the council will seek to ensure that quality of space is provided at a minimum that would encourage its early occupation in viable locations. In other cases, lack of occupation has been as a result of lack of demand. This has resulted in some cases in a declining townscape quality and image for an area. As such the council will not require re-provision where there is no reasonable prospect of non-residential premises being used for their intended purpose. In the case of this policy, where a developer does not propose the re-provision of non-residential uses and where not protected/ required as a result of other policies in the Plan, it will apply similar tests on need/ vacancy as required for local employment sites.
- 6.2.36 In very exceptional circumstances the council might accept wholly residential schemes without the development meeting tests related to need/ likely occupation. This might be for instance where an existing use is a 'bad neighbour'/ 'non-conforming' use which is undermining the amenity of an area. In these types of cases the applicant would have to show that the problems could not be addressed through its redesign or suitable conditions attached to a planning permission to overcome those adverse effects.

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Policy H1 Increasing housing supply

Policy H2 Small sites

Policy SD1 Opportunity Areas

Policy SD6 Town Centres and High Streets

Policy SD7 Town Centres: Development Principles and Development Plan Documents

Policy SD8 Town Centre Network

BRENT LOCAL PLAN

Policy BE3 Local Employment Sites and Work-Live

Policy BE4 Supporting Strong Town Centres

Policy BSI1 Social Infrastructure & Community Facilities

POLICY: BH3 BUILD TO RENT

The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent.^{MM99} 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:

- a) be shown to undermine the overall site's timely development; or
- b) would undermine viability to such an extent that it significantly undermines affordable housing delivery.

Justification

6.2.37 Build to rent provides a valuable addition in terms of increasing the capacity of the development sector to deliver new homes. The council is keen to encourage its provision as it widens the type of homes available in Brent, assists in producing additional homes to meet overall targets and is likely to drive up standards for tenants in new and existing market rented homes. To date the finances and models of delivery of build to rent appear to limit the extent to which these operators can compete with residential for sale. The London Plan Policy H13~~11~~^{MiM130} sets out the criteria for a development to be defined as Build to Rent, including a minimum size of 50 dwellings. The policy seeks to ensure that some sites are made available to build to rent developers. It is recognised however that as the product and market is relatively new. South Kilburn Growth Area is excluded from this policy due to the need to re-house the existing population within social rent properties which requires significant levels of subsidy generated by conventional market housing sales.

6.2.38 To limit risks of unintended consequences of this policy expectation, where there are genuine reasons why on-site provision might cause unintended consequences some flexibility is allowed. This might be for example if a site owner/developer has made genuine attempts to work with a build to rent operator but has been unsuccessful in being able to come to an agreement, meaning likelihood of significant programme delays which where provision is likely to be severe for housing delivery overall. Alternatively it could be if the inclusion of a build to rent element within the scheme can be evidenced to adversely affect viability to such an extent that it significantly undermines or^{MiM131} affordable housing provision. At the other extreme, the council does not wish to see all large scale development sites coming forward as build to rent. It wants to encourage additional home ownership opportunities within the borough for those that can afford it. Again this is part of its desire to see balanced and mixed communities where people have a long term commitment to the area and thus are likely to contribute more fully towards its social cohesion.

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Policy H12~~11~~^{MiM132} Build to Rent

POLICY: BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT

~~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.

Justification

6.2.39 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.

6.2.40 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).

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Policy H2 Small sites

Policy H2A Small Housing Developments

Policy G5 Urban Greening

Policy D7 Accessible Housing^{MM100}

POLICY: BH5 AFFORDABLE HOUSING

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.^{MM101}

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

Justification

6.2.42 The number of homes needed to meet Brent's affordable housing needs are significant. The needs outweigh the number of genuinely affordable homes within the necessary tenures (predominantly social rent) that can realistically be delivered over the lifetime of the Plan. This is the case when taking into account both the planning enabling and affordable housing provider funding mechanisms available. National policy requires the council to set affordable housing targets that are realistic. Particular regard has to be made to development viability. Government does not expect that each major housing application should routinely be subject to viability assessment.

6.2.43 London Plan Policy H6~~5~~ sets a threshold approach to affordable housing provision to remove the need for viability assessment. The affordable target is set and assessed on the basis of the percentage of the development's habitable rooms, or if there is a disparity between affordable and private room sizes, the habitable floorspace. Policy H7~~6~~^{MiM133} sets out the Mayor's minimum requirements in terms of tenure for 60% of the affordable housing sought. It then requires borough local plans to provide further detail on what the remaining 40% should comprise. Brent's needs are predominantly

for social rent/ London Affordable Rent levels. These are more difficult to deliver as they require the highest amounts of subsidy, either from the public purse or via cross subsidy from market homes for sale/ rent.

- 6.2.44 The council is very supportive of the Mayor's long term 50% affordable housing target and in the interim the fast track approach as set out in policy H65^{MiM134} as a tool towards achieving the 50% on all sites in the longer term. The council recognises that its historic target set out in the previous Local Plan of 50% of all new homes being affordable with a 70% social rent/ 30% intermediate tenure split was extremely challenging to achieve. The most recent Local Plan viability assessment indicates that this will not be achievable on most privately developed sites. It is still very challenging on publically owned sites, particularly against a backdrop of significant reductions in housing subsidy from central government as a result of austerity measures since the target was initially set. Government has more recently given some additional funding to support public sector/ subsidised housing provision. It has indicated potentially greater flexibilities on council funds to support affordable housing and additional financial support to Registered Providers. Nevertheless, against the backdrop of the significant step change in housing delivery required, these measures to date are still well short of increasing affordable supply to levels required and last seen in the 1970s.
- 6.2.45 Taking account of the potential for changes in circumstances, similar to the Mayor, the Council retains its strategic target of 50% of additional homes delivered being affordable. In relation to its local element of the London Plan tenure split over which it has discretion, the council will seek to maximise the amount of social rent/ London Affordable Rent that can be delivered on site in non-build to rent schemes.
- 6.2.46 Consistent with London Plan policy H6, any deviation from the minimum affordable percentage of habitable rooms not consistent with the required tenure mix and other policy requirements consistent with the fast track approach will need to be fully justified through a policy compliant viability assessment. ~~In these situations, where the case is proven, flexibility will be shown on the part of the council to allow a move away from the preferred tenure of social rent/ London Affordable Rent. This will however be to homes that will still be affordable to those that are able to receive housing benefits.~~^{MiM135}
- 6.2.47 Where viability impacts are so great that a reduction in percentage of affordable housing that can be achieved on site is below that required for the fast track approach, the council will seek to pursue the preferred tenure split set out in policy. It views the delivery of more affordable tenures that would meet needs (social rent and London Affordable Rent) as a greater priority than achieving a potentially higher percentage of affordable housing on site that places greater emphasis on intermediate tenures. Some developers nevertheless seek to increase the overall headline affordable homes percentage delivered on their site above the London Plan threshold levels through the provision of more intermediate tenure dwellings. In these cases, the council will seek at no extra cost to the developer, a scheme which greater prioritises genuinely affordable rents, even if this results in the overall headline percentage of affordable justifiably reducing.
- 6.2.48 London Plan Policy H1311^{MiM136} sets out a requirement for 30% of the affordable dwellings within a build to rent scheme to be at London Living Rent levels. The other

70% is for boroughs to identify, taking account of needs and viability. Within Brent the local plan viability study indicates that generally 100% London Living Rent equivalents can be achieved in relation to the thresholds identified in policy H6 for build to rent developments. This is therefore what is sought. As with affordable housing delivered from qualifying mainstream housing developments, it will prioritise affordable housing that meets priority needs (cheaper forms of rent) where the fast track approach is not being pursued. For schemes where affordable is below threshold levels it will as a minimum seek 70% of the affordable provided as London Living Rent equivalent.

6.2.49 In relation to intermediate housing tenures, the council would welcome affordable solutions, such as community land trusts, which offer a genuine alternative community focused/ led way of delivering new affordable homes. Where these types of solutions however potentially undermine the delivery of its preferred tenure mix, it should not automatically be assumed that this will be acceptable. Promoters of such schemes should seek to engage early on with the council, prior to committing any significant resource.

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 sought to support affordable housing provision elsewhere in the borough as set out in Policy BH5.^{MM102}

6.2.50 The extent of affordable housing need in Brent is very great. Small sites are expected to contribute a significant number of homes to meeting Brent's housing target. The Local Plan viability study indicates that minor developments (of under 10 dwellings) are sufficiently viable to provide some affordable housing. ~~London Plan Policy H6 identifies that boroughs for a number of reasons should only seek to address affordable housing requirements on minor developments through a tariff approach to off-site contributions.~~^{MiM137} The level of contribution sought will be identified in an Affordable Housing Commuted Sum calculator made available on the council's website.

Application Information

6.2.51 Design and access statement to clarify how the preferred size and tenure mix was taken into account in the initial design of the scheme and subsequent amendments. It will also identify how the need to promote 'inclusive development has been addressed, for example encouraging a mix of tenures across developments and a 'tenure blind' approach to external buildings' and outdoor space design.

- 6.2.52 An affordable housing schedule that provides information and justification on the tenure mix and size of dwellings included within the development. Ideally this should identify the Registered Provider who will own/ manage the affordable dwellings in non-build to rent schemes.
- 6.2.53 An affordable housing viability assessment if the application is not meeting the minimum fast track approach. Details of what this must include are set out in the London Plan and Housing SPG and the council's Local Validation List.

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Policy H76 Affordable housing tenure

Policy H87 Monitoring of affordable housing

Policy H131^{MiM138} Build to Rent

POLICY: BH6 HOUSING SIZE MIX

The council will seek to deliver a target of 25% of new homes as family sized (3 bedrooms or more) dwellings. For every four dwellings included within developments at least one must be 3 bedrooms or more. Exceptions to the provision of family sized dwellings will only be allowed where the applicant can show that:

- a) **the location or characteristics of the development are such that it would not provide a high quality environment for families, or**
- b) **its inclusion would fundamentally undermine the development's delivery of other Local Plan policies.**

Justification

- 6.2.54 In terms of dwelling sizes Brent's predominant needs (~~65.54%~~^{MiM139}) are more for larger sized (3 bed or more) family dwellings. Brent has significant levels of overcrowding (some of the highest in the country) and its ethnic mix means that multi-generational households are very prevalent. Despite the large need the policy requirement for family dwellings is set at 25%. The policy approach is considered to reflect a fair balance between meeting needs and ensuring mixed communities in new developments, providing enough flexibility on the remaining dwellings for developers to make schemes viable, whilst facing the market realities of incorporating this size of home in the types of developments that are predominantly going to be built in the borough. The 25% relates to the total provision on site and does not necessarily have to be reflected in each tenure, e.g. a higher proportion of affordable 3 bedroom or more dwellings for which there is a priority need can off-set provision in market dwellings.
- 6.2.55 The council understands that for some developments there might be legitimate reasons why the developer considers the provision of family housing is incompatible with the development proposed, e.g. specialist older people's housing, specific site characteristics, or viability impacts having a significant impact on the ability to achieve affordable housing targets. In these circumstances it will, where the reasons put forward by the applicant are suitably compelling, allow an exception to the 25% provision to occur.
- 6.2.56 Figure 33 shows the dwelling mix by tenure identified in the most recent SHMA. These needs will be updated periodically when new SHMAs are commissioned. This

table should inform a residential development's content particularly in terms of affordable homes provision. Where developments are providing affordable housing however, the council encourages early engagement as there may be specific needs in that area that are a greater priority to address.

Figure 33 Identified Needs Dwelling Size by Tenure Mix

	1 bed	2 bed	3 bed	4 bed	5+ bed	Total
Market Housing	14%	20%	52%	13%	1%	100%
Social/ London Affordable Rent	20%	40%	26%	11%	3%	100%
London Living Rent	10%	42%	30%	13%	5%	100%
Affordable Rent/ Shared Ownership	12%	50%	25%	12%	1%	100%

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Policy H4210^{MiM140} Housing size mix

POLICY BH7: ACCOMMODATION WITH SHARED FACILITIES OR ADDITIONAL SUPPORT

Proposals for student accommodation, non-self-contained or self-contained residential accommodation with shared facilities or on-site support/care to assist residents in their daily lives will be supported where the development meets all the following criteria:

- a) is located in an area with good access to public transport and other amenities, including shops (normally within 400m);
- b) is of an acceptable quality meeting appropriate standards for the needs of its occupants, including external amenity space, appropriate communal facilities, levels of support/ care and mobility;
- c) includes management arrangements agreed with the council suitable to its proposed use and size to not unacceptably impact on neighbour amenity;
- d) 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
- e) 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.**^{MM103}

The loss of existing accommodation or a site where planning permission exists for such use will only be acceptable where:

- a) demonstrated that there is no Brent need for the accommodation type, or residents' needs can be better met by other existing accommodation and the site owner after undertaking reasonable endeavours in working with the

council is not successful in finding an alternative supported accommodation scheme for the site; or

b) replacement of unsatisfactory existing accommodation which cannot be improved to achieve current standards.

Justification

- 6.2.57 The majority of housing needs will be met through self-contained residential accommodation. However, some will be met through non self-contained accommodation with shared facilities (such as houses in multiple occupation, shared-living or purpose built student accommodation). It might also be more institutional in its form as self-contained or non-self-contained accommodation that shares facilities or requires additional on-site support for residents (such as hostels, or extra care facilities). The policy seeks to provide greater clarity on how the council will support development proposals for these uses through the planning process.
- 6.2.58 For the purposes of this policy shared housing includes houses in multiple occupation (HMOs), bed-sits, hostels, housing for older people, supported housing for those with special needs, shared-living and specialist student accommodation. It also includes accommodation providing any level of care, whether non self-contained or self-contained units with a small amount of communal facilities. The policy seeks to protect the amenity of existing areas and create a good standard of accommodation in locations that are likely to be more suited to meeting occupiers' needs. It also protects existing sites where there is currently such provision.
- 6.2.59 Changes in demographics, welfare and lifestyle choices mean that there will be increased demand for these types of accommodation. These types of uses make a significant contribution to meeting local and in the case of students, London needs. They can also assist in developments through increasing viability and vitality and more balanced communities.
- 6.2.60 The developments are likely to be aimed at people with limited accessibility to personal transport. Consequently, there is a need for them to be located close to public transport and other amenities.
- 6.2.61 The developments could potentially be for people with specialised needs but with lower levels of income. This however should not diminish the quality of the accommodation provided. Where self-contained rooms are proposed they will be assessed against London Plan Policy D46 Housing quality and standards^{MiM141}. External amenity space will be required as will appropriate communal facilities to support residents (e.g. meeting rooms to stop residents congregating outside, in the vicinity of the development). Where levels of care or support are high provision of staff residential accommodation may be required.
- 6.2.62 To ensure that residential accommodation meets needs over time, London Plan policy requires 10% wheelchair accessible/ easily adaptable dwellings. The accommodation covered by this policy is likely to be meeting needs of specific sectors of the population. On this basis the council will be willing to depart from the minimum 10% wheelchair where evidence is compelling to indicate why it might not be appropriate e.g. where occupants are less likely to suffer from mobility disabilities compared to the general population. In other forms of accommodation there could be a need for a higher proportion, e.g. disability orientated housing.

- 6.2.63 Affordable housing requirements will be applicable to qualifying proposals for accommodation classified as C3 under this policy. Student accommodation is also subject to affordable requirements, as set out in London Plan Policy H4715. Shared living affordable housing requirements are set out in London Plan Policy H4816.^{MiM142}
- 6.2.64 There are also scenarios where these forms of accommodation can particularly impact on residential amenity, character and housing mix of an area. Residential amenity means both that of the potential occupiers and those adjoining the development. Adverse impacts are more likely where there are concentrations of one or more of these types of accommodation in an area. Common issues can include: noise and disturbance associated with intensification of the residential use and/or occupant lifestyles; on-street parking pressure; transient populations replacing settled family occupants; social cohesion impacts; changes in supporting community infrastructure such as shops; external alterations undermining clear local character; and poor waste management.
- 6.2.65 Harmful concentrations are likely to arise when the types of issues identified cumulatively result in detrimental effects on the qualities and characteristics of a place or where housing choice is reduced to not provide for differing community needs. For example, a concentration of accommodation for older or vulnerable people may have implications for local services such as GPs. Where the existence of similar uses in an area means this is identified as a concern, it should be demonstrated that local services have capacity or planned capacity to meet the needs of future occupants. Where this is not the case, and no other mitigation is agreed, the proposal may be unacceptable.
- 6.2.66 All of the forms of accommodation addressed by the policy will require information on their intended management to meet residents' needs to reduce the potential for adverse impact on amenity of those surrounding. For example, standards of behaviour expected tenants to reduce potential for persistent anti-social behaviour.
- 6.2.67 Brent is an area with lower property values than some parts of London, particularly inner London. Pressure created by welfare reform and support agency budgets to reduce costs might provide drivers for relocation to Brent. For the reasons identified in relation to potential adverse factors identified above in relation to concentration, Brent is reluctant to encourage such a move. Consequently, it will seek to ensure that with the exception of students, the accommodation proposed is addressing a Brent population specific need. Where appropriate it will seek to ensure that at least initially and in some cases for subsequent occupiers that priority for such housing is made available to people in Brent.
- 6.2.68 Consistent with London Plan principles of creating long term sustainable buildings, emphasis should be placed on construction methods to assist future conversion to self-contained residential accommodation. This may include allowing future rearrangement of internal walls, or a design based on permanent residential layout standards.

Houses in Multiple Occupation (HMOs)

- 6.2.69 HMOs must meet the standards of Brent's HMO licensing scheme, including minimum room sizes. These sizes have been developed in accordance with the Housing Act 2004. To reduce the potential for over-concentration the policy adopts a

simple approach of seeking to allow no more than 4 of any 11 adjacent 3 of properties being HMOs where three already exist in the ten nearest properties to the application property. This is measured taking the nearest front entrances when walking from the front door of the application property (so this is likely to exclude properties that share a rear garden boundary with the application property for instance). Each individual flat is regarded as one property for the purposes of this calculation. Where the application property is a flat, flats on the same floor are counted first within the ten. For houses this will be taken as 5 self-contained dwellings on each side on the proposal on the same side of the street, or as far up to 5 as possible with the remainder of the 10 on the property's other side. For flats the test will apply to adjacent self-contained properties sharing the same entrance, and if these do not add up to 11, then neighbouring properties. The landlords will be expected to register properties in conformity with the council's licensing scheme. In Build to Rent developments (as defined in the London Plan Policy H13) the Council is aware that operators may want to rent some self-contained properties to sharers and that it would be an unnecessary burden on both the Council and the developer to require planning permission for each change of use from self-contained dwelling to House in Multiple Occupation. As such the Council will seek to work with Build to Rent schemes to ensure that there is sufficient flexibility in planning permissions to ensure that an agreed number of dwellings can be used as Houses in Multiple Occupation at any one time.^{MiM143}

Hostels

6.2.70 Hostels must be designed with a layout to satisfactorily meet the needs of their intended occupants, with suitable communal spaces and rooms to meet any other associated needs.

Specialist Student Accommodation

6.2.71 The London Plan anticipates that the numbers of students in London will continue to grow and requires boroughs to ensure that both demonstrable local and strategic student housing needs are addressed. There has been a substantial increase in the amount of large scale purpose built specialist student accommodation from national providers in Brent recently, particularly in the Wembley area. This has been provided as either self-contained accommodation or rooms with shared facilities. It is good quality and has high levels of on site management. Continued additional provision particularly as part of a balanced mix of housing types within regeneration is supported. Growth Areas with their accessibility to public transport and local services, together with their potential for tall buildings are considered to be the most likely places for this type of accommodation. The London Plan has detailed policy H1815^{MiM144} in relation to student accommodation.

Losses of Accommodation

6.2.72 Other than in exceptional circumstances proposals should not result in the loss of ~~permanent self-contained accommodation with shared facilities or additional support. Such accommodation which provides care~~ will be protected unless it is no longer needed in the borough or it is replacing unsatisfactory accommodation that ~~and~~ cannot be brought up to current standards. Given the likely need for additional

supported housing within the borough, the council is keen to ensure that the opportunity to reuse supported housing ^{MiM145} sites or those with planning permission for supported accommodation are considered and given the opportunity to occupy these sites. This could be in its existing or reconfigured/ redeveloped form on the site. As such the owner will be expected to work with the council and use reasonable endeavours to test these opportunities with potential end users prior to, if this proves to be unsuccessful, accepting the potential for other non-supported uses being considered/ taken forward.

Application Information

- 6.2.73 Within the Planning Statement how the application addresses evidenced local needs or in the case of student accommodation London's needs is required.
- 6.2.74 To assess impacts on local amenity, the identification of other non HMO uses covered by this policy within a 50 metre radius of the property. For uses that accommodate more than 10 occupants the detail of impact on social infrastructure (such as GPs for supported and student accommodation) and whether this can be accommodated or if sufficient capacity is not available currently how this will be addressed.
- 6.2.75 Details and mechanisms of how the council can be assured that the accommodation will be:
- a) used by the people in the need identified to support the application, and
 - b) managed long term to minimise the potential for adverse impacts on the surrounding area
- 6.2.76 For example through suggested conditions related to restricting type of occupants and an agreed management plan. Where total loss of specialist accommodation is proposed without its replacement elsewhere in the borough, the justification as to why either the need for the accommodation is no longer required, or the accommodation is no longer fit for purpose and could not reasonably be made to be. This will include evidence to show that reasonable endeavours have been undertaken in association with the council to find an alternative specialist accommodation provider to use the site.

LONDON PLAN

Policy D46 Housing quality and standards

Policy H4412 Supported and specialised accommodation

Policy H4715 Purpose-built student accommodation

Policy H4816 ^{MiM146} Large-scale purpose-built shared living

POLICY: BH8 SPECIALIST OLDER PERSONS HOUSING

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;**

- b) Elsewhere, as a minimum 10% on ^{MM104} sites with a capacity of 500 or more dwellings.

Justification

- 6.2.77 The SHMA identified a need for more specialist accommodation to meet the needs of the growing numbers of older people. The London Plan sets an annual specialist housing for older people benchmark figure target ^{MiM147} for Brent of 230 dwellings. The Brent SHMA provides further detail and identifies that this will be across a range of products, including the traditional sheltered to schemes with increasing levels of support, such as extra care or specialist such as dementia.
- 6.2.78 Specialist older people's housing is provided by both the market, registered providers such as the council and Housing Associations and charities. More often than not however most models cannot compete directly with private sector led build for sale homes in the land market. As such the council is seeking to ensure that the potential for them to gain access to sites is made available through this policy. A specific percentage for all individual sites across the borough is not considered appropriate in policy as the models of delivery of specialist accommodation will vary related to delivery models reflective of needs. It may for example that an Extra-care scheme typically require a large number of dwellings to allow on-site provision of a range of support services to residents, whilst those with limited support or at the greater scale of intervention can be smaller in scale. On individual sites in Growth Areas it is therefore accepted that some may provide more housing for older people than others, although the emphasis will be on providing 10% overall. Given that many types of older people's schemes are supported by Registered Providers, there might well also be opportunities to consider to what extent affordable housing requirements on sites can be tied into potential older people's housing provision. ^{MiM148} As such the Council will seek evidence from the developer that they have made best endeavours from the outset to consider and accommodate a range of types of specialist older people's housing in Growth Areas and on large housing capacity sites. South Kilburn is excluded from this policy due to the need to re-house the existing population within social rent properties which requires significant levels of subsidy generated by conventional market housing sales.
- 6.2.78a The inclusion of older people's housing will play a part in creating mixed and balanced communities. The Housing Learning and Improvement Network (Housing LIN) provides a good source of information on high quality and innovative housing solutions for an aging population. Guidance has been produced by HAPPI (Housing our Aging Population Panel for Innovation) that gives examples of how to design homes so that they better meet users' needs. It also shows how they can be positively integrated into places to encourage the benefits that interaction creates between occupiers of the dwellings and the wider community. ^{MiM149}

LONDON PLAN

Policy H4513 ^{MiM150} Specialist older persons housing

POLICY BH9: GYPSY AND TRAVELLER ACCOMMODATION

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.

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.~~

~~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:

- a) Meet a Brent derived need for such accommodation;**
- b) 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;**
- c) Have acceptable accessibility by road users and pedestrians and to local services and public transport; and**
- d) Be laid out and incorporate boundary treatments that seek to positively integrate with the adjacent townscape/ communities.**

Justification

6.2.79 Brent currently has ~~30~~ 31 formal pitches of accommodation located on the Lynton Road Close 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 consistent with national policy and guidance related to identifying needs. Using the draft London Plan definition of a Gypsy or Traveller, a minimum of an additional 90 pitches would be required. This is very different to the results in the same assessment generated for the national definition. This indicated a need for no additional pitches. Existing residents of Lynton Road Close although living in caravans did not fall within the current national definition of Gypsies and Travellers for planning purposes. ~~Clarity will be provided on adoption of the London Plan which is the most appropriate.~~ The Council brought Lynton Close back under its management in 2017 and subsequently undertook an audit of the site. 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. The Council has resolved to address both these issues. It has invested £700,000 in installing bathrooms and kitchens for all the pitches in advance of any potential reconfiguration. It is working with the site's occupants to find a solution for those legitimately on site. This involves a

variety of options to support intergenerational living, ranging from provision of a limited number of additional standard traditional caravan pitches through to multi-storey dwellings that can accommodate all the occupants on site. It is the preference of the occupants to be on a single site. A move from traditional caravan accommodation might be difficult for some of the occupants. Ultimately it will be for the community working 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.

- ~~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 or 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.
- ~~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 allocations/ windfall sites that come forward for development incorporating new homes.
- ~~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.
- ~~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.
- 6.2.84 Any new proposed Gypsy and Traveller sites will need to provide a safe and acceptable potential living environment; essentially consistent with the characteristics expected of mainstream housing and ideally forming part of a wider balanced and mixed residential community. 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 Gypsy and Travellers' sites, particularly at their edges, should look to integrate well with its surroundings and promote opportunities for positive interaction with the adjacent townscape and associated communities.^{MM105}

LONDON PLAN

Policy H46^{MiM151} Gypsy and Traveller accommodation

POLICY BH10 RESISTING HOUSING LOSS

Development resulting in the net loss of residential dwellings will be supported only in exceptional circumstances where:

- a) sub-standard dwellings would be brought in line with London Plan space standards; or**
- b) de-conversion of flats would create a family size home (3 bed or more) resulting in the net loss of no more than one dwelling of 2 bedrooms or less; or**
- c) providing social or physical infrastructure to meet an identified local need which could otherwise not exist.**

Justification

- 6.2.85 The housing targets for Brent will be challenging to achieve. Loss of existing housing to make way for other forms of development would exacerbate this. London Plan Policy H408 deals with the ~~redevelopment loss~~ of existing housing and estate regeneration ~~redevelopment~~.^{MiM152} Brent seeks to supplement this policy by providing greater clarity on locally specific additional limited circumstances it is likely to consider such loss appropriate.
- 6.2.86 Some of Brent's housing stock does not meet national housing space standards and has poor standards of occupier amenity. This is particularly the case for dwellings created without planning permission but now established and dwellings created under-permitted development rights. In these situations, their loss and replacement with fewer dwellings achieving standards would be supported where the site does not provide the potential to accommodate more dwellings.
- 6.2.87 As identified in the SHMA and Policy BH6 Housing Size Mix provision of family accommodation (3 bed or more dwellings) to meet Brent's needs is a priority. Consequently, the de-conversion of flats into a family size dwelling will be supported where it results in the net loss of no more than one dwelling of 2 bedrooms or less.
- 6.2.88 Exceptional circumstances may arise in Brent where a loss of residential floor space will be acceptable in order to achieve Brent's strategic priorities. Situations include meeting an essential identified local need, e.g. overcoming a deficiency of local social infrastructure such as nursery space, place of worship or physical infrastructure that cannot be avoided such as a significant transport improvement.

Application Information

- 6.2.89 Supporting evidence showing conformity with the policy, e.g. comparison of existing accommodation with that proposed in meeting current policy requirements around space and amenity, or justification for exceptional loss of residential accommodation to meet wider community benefits.

LONDON PLAN

POLICY BH11 CONVERSION OF FAMILY SIZED DWELLINGS

To maintain family size housing conversion of a family sized home (3 bedrooms or more) to two or more other dwellings will only be allowed where all the following criteria are met:

- a) the existing home is 130 sq.m. or more or could acceptably be extended to be that size;**
- b) it results in at least a 3-bedroom dwelling, preferably with direct access to a garden/ amenity space; and**
- c) it is within an area of PTAL 3 or above.**

Exceptions to this will only be allowed where the amenity of the existing family sized home is so deficient that family occupation is unlikely and it could not reasonably be changed to overcome such deficiencies.

Justification

6.2.90 Conversion of existing housing stock into smaller dwellings provides many additional homes across London and Brent. Nevertheless, family housing to meet local needs is also a Brent priority. In recognition of this priority it is therefore appropriate to identify circumstances when loss of family housing is likely to be acceptable. Residential conversion in other cases is addressed by London Plan policies, the contents of the Housing SPG and Policy DMP1 General Development Management Policy.

6.2.91 The policy seeks to allow for efficient use of existing housing stock through the conversion of existing larger dwellings to assist in meeting housing targets. However, it also seeks to ensure continued provision of family sized housing (3 bedrooms or more) suitable for occupation by families to meet Brent's housing needs. Consequently, where larger properties are suitable for conversion, schemes should include at least a 3-bed or more dwelling suitable for at least 4 people. Ideally the family sized accommodation will be at ground floor (if there is no access to a lift) to provide for ease of entry and also have direct access to associated amenity space. The minimum size of 130 sq.m. for the existing home can take into account its potential to extend through permitted development rights not yet implemented, or potential extensions which will be consistent with Brent's Residential Extensions and Alterations Supplementary Planning Document. This size is used to ensure that the proposed dwellings within the development would be London Plan Policy D46^{MiM154} space compliant. Effort should be made to provide all additional flats with amenity space.

6.2.92 In exceptional circumstances the council may accept the conversion of a family sized dwelling to two or more 1 or 2 bedroom dwellings. This will be appropriate where the existing dwelling is likely to be so deficient in terms of its amenity for family accommodation and it could not reasonably be changed to overcome such deficiencies. Lack of a garden/ amenity space will not automatically allow for the conversion of dwelling into smaller dwellings. Other amenity factors will also be taken into account in deciding whether an existing family sized dwelling provides or has the

potential to provide a good family environment. This will include location and other factors. For example, above a retail parade in a centre may have adverse associated impacts such as disturbance caused by hours of opening, noise, smells, constrained access width to upper floors and other issues.

LONDON PLAN

D46^{MiM155} Housing quality and standards

Housing SPG

Application Information

6.2.93 Supporting evidence showing conformity with the policy, e.g. comparison of existing accommodation with that proposed in meeting current policy requirements around space and amenity, or justification for exceptional loss of family accommodation.

POLICY BH12 RESIDENTIAL OUTBUILDINGS

Planning permission will only be granted for outbuildings that will not be residential accommodation or do not support the increased occupation of a dwelling.

Justification

6.2.94 The policy seeks to reduce the potential for overcrowding of residential properties through means available through the planning process. In particular, it seeks to reduce the potential addition or use of outbuildings to increase the capacity of a dwelling's occupation.

6.2.95 London Plan Policy D46 and also the Housing SPG give significant direction on the standards and quality that residential development is expected to achieve. In Brent all new housing should comply with the standards. Brent has a high proportion of overcrowded dwellings. It also has some very poor quality private rented accommodation. The council is taking measures through its statutory roles related to housing in improving the quality of residential accommodation in the Borough and the ^{MiM156} reducing the incidences of poor properties. Planning has a complementary role to play in reducing the opportunities for overcrowding to occur.

6.2.96 'Beds in sheds' are a prevalent issue in Brent. These are buildings or structures in gardens either used as self-contained accommodation or for 'primary' living accommodation (e.g. kitchens, toilets, bathrooms, bedrooms and living spaces) ancillary to the main dwelling. Often this accommodation is built without planning consent, often with great effort to conceal its use and if detected a retrospective application sought for its retention. Brent's experience means the council considers that such development is unlikely to provide a satisfactory residential environment for its occupants, or if ancillary, for those in the main house. It often adversely impacts on neighbours through an over-intensification of use.

Application Information

6.2.97 For buildings ancillary to residential accommodation, clarity on the purpose of the building and agreement to a planning condition restricting use of the building to not include sleeping accommodation, bathrooms, laundry rooms or kitchens.

POLICY BH13 RESIDENTIAL AMENITY SPACE

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.^{MM106}

Justification

- 6.2.98 The policy seeks to ensure a suitable level of provision of amenity space in association with residential development. It identifies for Brent a locally distinctive target reflective of a historic approach to provision of amenity space.
- 6.2.99 The London Plan Policy D46^{MiM157} sets out a baseline minimum standard amount for the provision of amenity space in new developments and the characteristics it is expected to have. It also deals with children's play space in Policy S4. Brent has historically sought and often delivered within higher density schemes higher levels of amenity space based on its own standard which it considers should be maintained. Family housing for purposes of policy is identified as 3 or more bedroom dwellings.
- 6.2.100 New developments should provide private amenity space to all dwellings, accessible from a main living room without level changes and planned to take maximum advantage of daylight and sunlight. Where sufficient private amenity space cannot be achieved individually for each dwelling to meet the full requirement of the policy, the remainder should be supplied in the form of communal amenity space. In some locations, such as town centres, in high density developments the council understands that meeting the overall minimum might be challenging. Whilst amenity space will assist in achieving the urban greening factor targets, other requirements such as renewable energy sources may compete for areas that might otherwise accommodate amenity areas, such as roofspace. As such flexibility could be allowed where it can be shown that all reasonable options for provision have been considered. In these cases, the quality of any communal space will need to be particularly high to show it can meet residents' needs. Where not meeting the standards, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account factors such as, accessibility of dwellings to their own amenity space and its quality, the amount and quality of communal space, proximity to other areas of open space nearby and internal amenity spaces.^{MiM158} The calculation of amenity space does not include any parking, cycle or refuse and recycling storage areas.

LONDON PLAN

Policy D46^{MiM159} Housing quality and standards

Policy S4 Play and Informal Recreation

Housing SPG

Play and Informal Recreation SPG

6 Themes

6.3 Social Infrastructure

Where are we?

- 6.3.1 Brent has a range of community facilities including health, education, leisure, culture and sports facilities which provide essential services to residents. These facilities contribute to a good quality of life and play a vital role in supporting Brent's diverse community; reducing inequality and helping to promote social inclusion and cultural wellbeing.
- 6.3.2 Rapid population growth and the high housing target set for Brent in the London Plan has generated increased need for community and social facilities at the same time as pressure on existing facilities has increased.

Where do we want to be?

- 6.3.3 Development in Brent will be supported by new and improved community facilities to meet the needs of the growing population. Facilities will be located in accessible locations throughout the borough in response to identified need and will be flexible, adaptable and open to the wider community outside of core hours. There will be reduced pressure on sites to convert to higher-value uses such as residential and new facilities will be co-located as part of mixed-use developments to support large developments coming forward in Brent's Growth Areas.

LONDON PLAN

London Plan S1 Developing London's social infrastructure

London Plan S2 Health and social care facilities

London Plan S3 Education and childcare facilities

London Plan S4 Play and informal recreation

London Plan S5 Sports and recreation facilities

London Plan S6 Public toilets

London Plan S7 Burial space

POLICY BSI1: SOCIAL INFRASTRUCTURE & COMMUNITY FACILITIES

EXISTING SOCIAL INFRASTRUCTURE

Existing social infrastructure and community facilities will be protected and retained unless it can be demonstrated that:

- a) **The existing facility is not required in its current use and there is no demand for any other suitable community use on the site; and**
- b) **The loss of social infrastructure would not result in a shortfall in provision of that use; or**
- c) **A replacement facility that would better meet the needs of existing users is provided; or**
- d) **Redevelopment is part of an agreed programme of social infrastructure re-provision to ensure continued delivery of social infrastructure and related services, as evidenced through a service delivery/estates strategy**

In reference to criteria a and b, where there is no longer a community need for the facility's current use, the potential of re-using or redeveloping the existing site for an alternative social infrastructure use, particularly educational, religious, sports and leisure facilities or specialist housing, must be considered before other uses are pursued.

NEW SOCIAL INFRASTRUCTURE

Proposals for new or enhanced social infrastructure facilities, including the consolidation of existing facilities, will be supported by the Council where:

- e) easily accessible by public transport, walking and cycling, preferably in town centres or Growth Areas;**
- f) located within the community they are intended to serve;**
- g) provided in flexible and adaptable buildings;**
- h) ideally co-located with other social infrastructure uses; and**
- i) maximising wider community benefit, through if necessary, requiring formal community use agreements.**

Justification

6.3.4 Social infrastructure (also referred to as community and cultural facilities) plays a vital role in supporting Brent's diverse community, reducing inequality and helping to promote social inclusion and cultural wellbeing. The Council defines social infrastructure as a wide variety of services that are essential to the sustainability and wellbeing of a community. This could include the following:

- a) Educational facilities including early years' education, primary education, secondary, special schools, further education and adult learning;
- b) Health services including primary and secondary health;
- c) Sports and leisure facilities including swimming pools, sports halls and outdoor sports spaces;
- d) Libraries;
- e) Places of worship;
- f) Theatres, music, galleries and other cultural space;
- g) Community space, meeting rooms and halls;
- h) Specialist/supported housing;
- i) Fire stations, ambulance stations, policing and other criminal justice or community safety facilities; and
- j) Public houses.

6.3.5 This list is not exhaustive and other facilities can be included as social infrastructure.

6.3.6 As Brent's population continues to grow and diversify it is essential that the local need for community facilities is adequately met. It also needs to be designed to be easily accessible and adaptable. This will allow it to be better used and more likely to be viable in the longer term. It will also meet users' needs without the need to invest substantial sums, which for most community groups are unlikely to be available. Social infrastructure should also be used to its maximum potential, which often is not currently the case due to occupier practices. To promote community cohesion and make best use of land, the multiple use of new premises will be sought. Where relevant, Community Use Agreements (CUA) will be secured to ensure dual use

through S106 planning obligations. The development and implementation of CUAs can help support well-managed and safe community access to facilities, for example on educational sites. This can also encourage other outcomes. As well as widening access to facilities and providing clarity on their use CUAs can help to enhance links between community groups, educational establishments and sports clubs.

- 6.3.7 Across Brent's Growth Areas, significant developments will come forward over the Local Plan period which will provide opportunities for the provision of new social infrastructure and the enhancement of existing facilities. Further detail on what's required is set out in individual site allocations.
- 6.3.8 Brent's Local Plan will play an important role in safeguarding existing infrastructure. It will also ensure that new development seeks to provide adequate new infrastructure to meet the needs of a growing population. This will be either by delivering facilities onsite or adjacent to it or through payments made to the council to ensure facilities are provided in another location within or sometimes outside the borough. In other cases, it might be through policies that identify specific sites for infrastructure or facilitate its delivery subject to it meeting criteria that make its provision acceptable in planning terms.
- 6.3.9 Developments which propose the provision or loss of social infrastructure will need to supply sufficient evidence of its local need, using accepted methodologies. The evidence will demonstrate if there is a local demand, and if so, how this demand would be best met. With regards to loss, evidence should be provided demonstrating how the premises have been marketed at realistic rates for a minimum of 12 months. This will allow alternative community uses to bid prior to its use as a non-community facility.
- 6.3.10 Significant pieces of social infrastructure that are currently known about or predicted to be required are set out in the infrastructure delivery plan. Further details are provided in the delivery and monitoring chapter. This will be updated on a rolling basis, taking account of information that is available at the time. It is clear that against a background of significant population growth that the requirements for social infrastructure will be significant. Against a current and likely future background of public sector funding restrictions, there is a substantial predicted deficit in finance to deliver much of what is required. The Mayor and council will continue to lobby for sufficient funds to properly support growth.

6 Themes

6.4 Economy and Town Centres

Where we are?

- 6.4.1 Brent's economy is currently home to 14,500 businesses employing 113,500 people and generates a Gross Value Added to the economy of approximately £8.9 billion.¹ The borough has experienced strong economic growth since 2014. The number of jobs has increased by 17%, and the number of businesses by 24%. The borough has a diverse business base; micro businesses (employing up to 9 people) comprise 89% of businesses. Unemployment levels have been reducing. They remain higher than the London average, and particularly high amongst women. In April 2018, median gross weekly earnings for full-time employees in Brent was £583, up 3.3% from 2017. This is still well below the average for London (£713). This reflects many of Brent's main employment sectors being lower skilled and therefore typically lower paid.
- 6.4.2 The largest employment sectors in Brent are public administration, education and health; retail; hospitality, leisure and recreation and business support services. Combined these four sectors account for around 55% of employment in Brent. Other specialisms include wholesale, logistics, transport and manufacturing, particularly food manufacturing. There are variations in sector representation across the borough. In the south east there is a higher concentration of employment in ICT, media, creative services, professional and financial services. To the south west manufacturing, logistics, wholesale and transport are the dominant sectors, whilst in north and central Brent health, public services and administration are the main sectors. Wembley also has a focus on tourism and retail.
- 6.4.3 Brent's economic hubs are provided across a range of locations. Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) are larger industrial estates which cater for a wide range of industrial uses and account for 374.5ha of Brent's industrial land. These include Park Royal SIL, London's largest industrial site, and Alperton LSIS. Park Royal has been designated by the Mayor of London as an Opportunity Area, and planning policy for this area is contained within the Old Oak and Park Royal Development Corporation Local Plan. Local employment sites account for 90ha of industrial land, and are smaller scale often embedded in residential areas. Town centres also accommodate many businesses as well as the more obvious retail and leisure uses. Brent's industrial estates are generally low density. Whilst some contain modern well managed premises, others are in a poorer condition and have seen limited investment.
- 6.4.4 To support businesses and the local economy the council has established a range of business support initiatives and engagement across its priority town centres. It works

¹ ONS (2017) Regional gross value added (balanced) by local authority in the UK.

alongside the West London Alliance to promote inward investment at a sub-regional level.

- 6.4.5 Brent's town centres play an important role in supporting the borough's economic vitality and reflect the diversity of the communities that they serve. Brent's town centres provide 20% of jobs within the borough and over the last decade significant investment has delivered improvements to the overall retail and leisure offer including the London Designer Outlet and numerous improvements to the public realm on key high streets. Despite this, the borough's town centres still face significant challenges. Vacancy rates in several centres far exceed the London average and local businesses face tough competition from online shopping and out-of-town shopping centres such as Brent Cross and Westfield. Brent has nine priority town centres which each have an assigned Town Centre Manager. These are: Kilburn, Colindale, Burnt Oak, Harlesden, Willesden Green, Neasden, Church End, Wembley and Ealing Road. The council is producing town centre action plans that deal with objectives related to retail, improving the economy, making centres more attractive and accessible, allowing them to better meet the needs of the surrounding community and providing for additional housing opportunities.

Where we want to be

- 6.4.6 To reduce inequalities Brent has to move to a higher wage economy, fostering conditions where business and individuals can develop and succeed.
- 6.4.7 When compared with other London boroughs Brent is overrepresented in sectors more at risk of automation and changes in technology and patterns of trade. Supporting existing business is important. However, there is also a need to enable future growth sectors such as the low carbon circular economy, science and technology, and creative industries. This will involve improving infrastructure, particularly digital and 5G networks, and securing a range of high quality workspaces, including affordable, incubator, accelerator and co-working (IAC) spaces, research labs and makerspaces.
- 6.4.8 For individuals, access to skills, education and training as well as jobs, will be key. Brent already benefits from a number of major employers in education and health. The University of Westminster's School of Media, Arts and Design is located at Northwick Park as is Northwick Park Hospital. The College of North West London has campuses at Willesden and Wembley. Brent Start adult community learning provision has a presence in Stonebridge, Harlesden, Willesden and in community venues across the borough. There is scope to further improve all of these facilities, increase access to employment, high quality education and re-skill employees in declining sectors. For example, the College of North West London is looking to consolidate its facilities into one at Wembley Park. The council is very supportive of this because of the benefits it will bring to the college, its students and also the place making of Wembley. In addition, it will be important to capture the benefits of development for local people. e.g. by ensuring they can access the employment and training opportunities development brings.

- 6.4.9 The West London Employment Land Evidence London Plan identifies a need within Brent as having potential to provide for additional employment industrial workspace floorspace capacity. To achieve this, there will be a need to make better use of industrial sites and secure additional employment industrial floorspace elsewhere. This will be through intensification of SIL and LSIS to increase plot ratio to a minimum of 0.65; seeking an increase in employment industrial floorspace on non-designated industrial sites; securing new employment industrial floorspace in Growth Areas and through the diversification of town centres. MiM160
- 6.4.10 The London Plan ~~also~~ MiM161 emphasises the importance of town centres and seeks to promote and enhance their vitality and viability to create hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, social infrastructure and residential development. To pre-empt and prevent further decline of Brent's high streets and in particular the retail sector, mixed-use developments will be encouraged on the peripheries of town centres, providing space for developments containing a mix of housing, workspace and/ or community facilities. The council has developed short, medium and long term action plans for its priority town centres. The wider role of town centres will be addressed in this section, the housing and heritage and culture sections, as well as the individual places.

LONDON PLAN

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E3 Affordable workspace

Policy E4 Land for industry, logistics and services to support London's economic function

Policy E5 Strategic Industrial Locations (SIL)

Policy E6 Locally Significant Industrial Sites

Policy E7 Industrial intensification, co-location and substitution

Policy E11 Skills and opportunities for all

Policy SI6 Digital connectivity infrastructure

Policy SD6 Town Centres and high streets

Policy SD&Z Town Centres: Development principles and Development Plan Documents

Policy SD7&8 ^{MiM162} Town Centres Network

Policy SD9 Town Centres: Local Partnerships and implementation

West London Waste Plan

POLICY BE1 ECONOMIC GROWTH AND EMPLOYMENT OPPORTUNITIES FOR ALL

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.

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.

Further and higher Educational provision quarters at Northwick Park and Wembley will be protected and enhanced.^{MM107}

An Employment, Apprenticeship and Training Plan will be required for all developments of 5,000sqm or more or sites capable of providing 50 or more residential units, to be prepared in partnership with Brent Works or any successor body.

The council will work with its partners and require developments to support improvements to Wi-Fi and move towards 5G across the borough.

Justification

6.4.11 The Granville in South Kilburn Growth Area is a good example of how workspace can support the local economy and foster a sense of community. The Granville is managed by South Kilburn Neighbourhood Trust, and was developed with support from the council and Mayor of London. It provides an affordable range of enclosed office, shared studio and dedicated desk space, as well as training opportunities for local people. Opportunities for additional affordable workspace will be sought in South Kilburn, where it does not prejudice the wider programme to provide new social rented housing for existing secure tenants. Securing workspace in Growth Areas will contribute to creating vibrant places where people want to live. It will also be important to meet the ~~London Plan requirement~~ need for Brent to provide additional ~~employment~~ industrial floorspace. The Brent Workspace Study has established a need for additional industrial workspace to meet local needs, especially in Growth Areas. All major developments exceeding 3000 sq.m in employment floorspace in the Growth Areas outlined ~~above~~ in Policy BE1 should provide a minimum of 10% affordable workspace in ~~the B-use class~~ studio, makerspace and light industrial uses. Where a site is both a SIL/LSIS and a Growth Area requirements in Policy BE2 takes precedence.^{MiM163}

6.4.12 Affordable workspace is workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. Affordable workspace should be provided for start-up companies or in the form of 'move on' space for SMEs. ~~B1(c)~~ Light industrial floorspace will be prioritised to meet the identified need for this form of ~~employment~~ workspace in the borough. An Affordable Workspace Operator should be engaged at the earliest stage, before

pre-application advice is sought, to ensure space is fit for purpose. The council's list of approved Affordable Workspace Operators seeking space in the borough is available at:

www.brent.gov.uk/your-community/regeneration/affordable-workspace. If an operator is identified that is not on the list, they can apply to be registered. Affordable workspace will be secured for the lifetime of the development. The applicant should submit evidence of having consulted with an approved Affordable Workspace Provider Operator^{MM164} to determine the design of the space is suitable and that it is affordable, at no more than 50% of comparable local market rate. Each lease should cover a period of at least 10-15 years. This will be secured via a S106 planning obligation. The level of fit out of the workspace to a specification agreed with the Affordable Workspace Operator and to a minimum of CAT A fit-out, unless agreed otherwise with the Operator or the council. An Affordable Workspace Management Plan will be required for the space, agreed between the Affordable Workspace Operator and council, covering how the space will be managed, rent levels and reasonable priority for local people. Consideration will be given to the requirements of the Workspace Operator. Further detail will be provided in a Brent Affordable Workspace SPD.

- 6.4.13 In some circumstances rather than provide workspace on-site, it may be appropriate for developments to provide financial contributions to delivering workspace elsewhere within the Growth Area or town centre. For example, where it is preferable to create one larger workspace, with shared management arrangements. Discussion with the council and operators will determine where this is appropriate.
- 6.4.14 Northwick Park Hospital, University of Westminster and College of North West London are major employers in Brent. In some cases, their premises are becoming dated. The council will support proposals which will improve, modernise and consolidate their facilities, so they can better meet future healthcare and educational needs. Any reduction in floorspace for education that results in a loss of capacity for learners will be resisted.
- 6.4.15 Brent Works provides developers and businesses support in training and recruitment. This benefits the business by helping to provide access to a skilled, local workforce. It also ensures local people benefit from the employment, apprenticeship and training opportunities development can bring. ~~Major developments will be required to produce an~~ Employment, Apprenticeship and Training Plans will be required^{MiM165} in line with guidance produced by Brent Works. Developers should engage with Brent Works at the earliest stage to discuss their needs.
- 6.4.16 The Brent Digital Strategy sets out how the council will work with and support local residents, partners and businesses to help Brent to become a digital borough. A key objective of the strategy is to ensure borough-wide digital infrastructure providing instantaneous connectivity. This includes improving broadband speeds so that they are fit for purpose, now and in the future and working with the market to ensure Brent benefits from the roll out of new 5G networks.

6.4.17 Consistent with this objective, London Plan policy S16 Digital connectivity infrastructure requires new developments to achieve greater digital connectivity than set out in Building Regulations and ensure provision of sufficient ducting space for future digital connectivity infrastructure. In Brent in applying this policy, full fibre (FTTP) gigabit capable connection and ducting which allows multiple providers to easily pull fibres through the ducts without the need for costly and disruptive additional digging will be sought. Fibre delivery early in the planning process alongside traditional utilities will be required.

POLICY BE2 STRATEGIC INDUSTRIAL LOCATIONS (SIL) AND LOCALLY SIGNIFICANT INDUSTRIAL SITES (LSIS)

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

Employment Industrial Site^{MM248}	Designation	Policy approach
East Lane	SIL	Intensification 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.
Northfields (east and west of Grand Union Canal) ^{MM251}	SIL	
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	On these sites intensification through co-location will be supported, subject to a comprehensive masterplan approach produced with or agreed by
Church End	LSIS	
Colindale	LSIS	
Cricklewood	LSIS	

Honeypot Lane (Lowther Road)	LSIS	<p>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; 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.
Honeypot Lane (Westmorelane Road)	LSIS	
Neasden Lane	LSIS	
Northfields (east of Grand Union Canal)	SIL	<p>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.^{MM108}</p>

Justification

6.4.18 The evidence base supporting the London Plan, the London Industrial Land Demand Study (LILDS) identifies a significant need for additional industrial premises across

West London in the period to 2041. For Brent (including parts of the borough where OPDC is the planning authority) it identifies the need for an equivalent of 46.9 hectares of additional industrial land. The West London Employment Land Evidence 2018 (WLELE) commissioned by west London boroughs, including Brent, reviewed the LILDS. The WLELE identifies that additional capacity is required, but for a much smaller amount of 0.6 hectares. Consistent with national policy and the London Plan, the Council has to plan to meet the need for additional capacity as a provide industrial capacity borough. Demand is identified for light industrial, general industry and storage and distribution uses floorspace, with increased need principally related to the logistics sector in the use classes B1c, B2 and B8. The West London Employment Land Review (WLELR) identified demand for an additional 0.6ha of industrial floorspace, primarily to meet projected demand for logistics. In addition to this, a number of sites within designated industrial sites are protected for waste purposes as identified in the West London Waste Plan and the policies map. The London Plan sets a higher waste target for Brent than previously which may mean additional sites for waste purposes will be required. Consistent with its 'provide capacity' status Brent the Council is committed to exceeding this figure delivering an to increase in industrial floorspace to support growth in business and employment.

6.4.18a There is a large divergence in the results of LILDS and WLELE. In relation to the LILDS, the London Plan provides no specific industrial land needs target for Brent or the OPDC. Park Royal as the preeminent industrial location in West London, with the associated higher rents and development values is the most viable area in the borough and West London to accommodate the London Plan's emphasis on intensification of SIL. It is anticipated it will play a significant role in meeting the additional needs. Elsewhere the viability of intensification purely for industrial purposes is less clear and will need further assessment, although for co-location with other development including residential, it is more encouraging. The Council will work closely with the OPDC who are producing their Local Plan and with the GLA to clarify the extent to which intensification in Park Royal will provide additional industrial capacity. This work will also need to involve LB Ealing as Park Royal is also within their borough and similar to Brent has OPDC as local planning authority and other boroughs/stakeholders across west London if necessary. Notwithstanding this, within the area covered by this Local Plan Consistent with its 'provide capacity' status Brent the Council is committed to delivering an exceeding this figure to increase in industrial floorspace to support growth in business and employment. Currently, many of the borough's industrial sites are underutilised and include non-industrial uses. London Plan policy E7 requires d Development in SIL and LSIS which are not identified as suitable for co-location in policy BE2 provides an opportunity for the market to intensify industrial floorspace to meet needs. In these locations, loss of industrial floorspace will be resisted. In designated industrial areas identified as appropriate for co-location an increase of industrial floorspace to achieve a plot ratio to 0.65 (0.65 sq.m. of floorspace for each 1 sq.m. of site area) or the re-provision of the existing amount of industrial floorspace, whichever is the highest, will be sought. Such intensification will be instrumental to increasing industrial floorspace in the borough. Additional capacity will also be secured by where possible increasing floorspace on non-designated industrial sites (policy BE3), and securing workspace in

Growth Areas and secondary frontage of town centres (policy BE1 and BE4), and intensification of Park Royal which is being led by the OPDC. The extent to which intensification and co-location will lead to an increase in industrial floorspace at this time is not known. Initial preliminary masterplan options work on Staples Corner in association with the GLA has shown addressing landownership and viability issues to incentivise and deliver additional floorspace is a complicated process. Nevertheless, the Council will undertake best endeavours to provide additional capacity in excess of the WLELE need, with a backstop position of not dropping below the 0.65 plot ratio within each defined industrial location.^{MiM166}

6.4.19 The West London Employment Land Review (WLELRE) identifies that whilst demand and viability will support intensification of industrial uses in some areas of SIL and LSIS, in others co-location is needed to incentivise intensification. Policy BE2 sets out Brent's approach to co-location and intensification based on an analysis of SIL and LSIS in the WLELRE and Brent Industrial Land Audit. Policy BE2 is a starting point which identifies where co-location could be appropriate, but this would be subject to demonstrating the criteria in London Plan policy E7 could be achieved through a masterplan-led approach. ~~Critically, it will need to be demonstrated that co-location would achieve a plot ratio of 0.65.~~^{MiM167} The council will work with its partners to develop masterplans for Church End, Neasden and Staples Corner. Where masterplans are developer-led, the developer will need to work closely with the council and GLA from the outset. Masterplans will need to be produced in accordance with the GLA Practice Note: "Industrial intensification and co-location through plan-led and masterplan approaches".

6.4.20 In calculating what constitutes the minimum floorspace requirement required in any site's redevelopment supported by a masterplan, the existing employment industrial or warehousing floorspace or a plot ratio of 0.65 will be applied, whichever is the higher. Brent's employment areas contain a number of sui generis uses, such as trade merchants. These in the future could reasonably convert to other industrial uses to help meet demand for industrial, storage and warehousing. Therefore, for the purposes of calculating existing floorspace the council will include all floorspace within office, research and development, light industrial, general industrial and storage and distribution ~~the B use class~~^{MiM168} and closely related sui generis uses. Where a site has been long-term vacant or converted to uses which are not compliant with SIL and LSIS the level of floorspace will be based on plot ratio.

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Policy E4 Land for industry, logistics and services to support London's economic function

Policy E5 Strategic Industrial Locations (SIL)

Policy E6 Locally Significant Industrial Sites (LSIS)

Policy E7 Industrial intensification, co-location and substitution

POLICY BE3 LOCAL EMPLOYMENT SITES AND WORK-LIVE

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. 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 be successful, financial contributions will be secured to provide equivalent affordable workspace elsewhere. ^{MM109}

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

6.4.21 Local Employment Sites are sites outside of SIL and LSIS in employment use within the B use class office, research and development, light industrial, general industrial or storage and distribution and closely related sui generis uses. They can be sites wholly in employment use, or part of the floorspace or yardspace of a mixed use building or site. They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy in recognition of the need for additional industrial floorspace within the borough seeks to support the retention and intensification of Local Employment Sites for continued industrial use, consistent with policy E7 of the London Plan. ^{MiM169} The 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.

6.4.22 Under criterion a of Policy BE3, to demonstrate there is no demand for a Local Employment Site for ongoing employment use the applicant must submit evidence that the site is vacant and a thorough marketing exercise at realistic prices for the area has been sustained over a 24 month period. Marketing must be through a

commercial agent at a price that genuinely reflects the market value in relation to use, condition, quality and location of floorspace. A professional valuation of the asking price and/or rent will be required from at least three agents to confirm that this is reasonable. It must be demonstrated that consideration has been given to alternative layouts and business uses, including smaller premises with short term flexible leases appropriate for SMEs. Where the Council accepts that a site is unviable for its retention for wholly employment purposes, it will seek the re-provision of maximum amount of employment space that is viable in any development proposal.
MiM170

6.4.23 Under criterion b of Policy BE3, in exceptional circumstances a mixed-use development incorporating non-employment uses may be appropriate. The applicant must demonstrate that redevelopment will result in:

- a) an increase in the amount of employment floorspace as defined in 6.4.21 on the site;
- ab) the accommodation of the existing employment use, or all provides the increased workspace is provided as affordable studio, research and development, light industrial or general industrial workspace with maker space in light industrial use prioritised to meet development needs of businesses in Brent, particularly SMEs;
- b) ~~an increase in the amount of employment floorspace on the site in the B use class;~~^{MiM171}
- c) delivery of wider regeneration benefits to the community; and
- d) employment floorspace with a very strong prospect of being occupied.

6.4.24 As evidence the employment space will be occupied the council will require a letter of agreement from the current employment use operating from the site stating their intent to occupy the proposed floorspace. Alternatively, where the current occupier has agreed to relocate the additional employment floorspace should be provided as affordable workspace should be provided for start-up companies or 'move on' space for SMEs. B1(c)-Light industrial floorspace will be prioritised to meet the identified need for this form of employment space in the borough. Brent's requirements for affordable workspace as set out in Policy BE1 and supporting^{MiM172} paragraph 6.4.12 apply.

6.4.25 For development of Local Employment Sites in areas with existing or emerging creative clusters, affordable workspace is to be provided on-site. This is These are 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. Elsewhere in the borough if the Council considers that there is no demand for workspace or that the space is unlikely to operate as affordable workspace over the longer term, financial contributions will be secured to re-provide equivalent affordable workspace employment floorspace elsewhere within existing or emerging creative clusters.^{MiM173}

6.4.26 Work-Live is the combination of living accommodation (Use Class C3 defined as dwellinghouses in the use classes order) with workspace (office, research and

~~development and light industrial uses Use Class B1, but not B2 or B8~~^{MiM174} within a single self-contained unit. Applications for Work-Live development must be supported by a management plan agreed by the council which demonstrates the units will be managed by an organisation committed to their long term management primarily for employment. An indicative ratio of 70:30 in favour of the work element will be sought.

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Policy E7 Industrial intensification, co-location and substitution

POLICY BE4: SUPPORTING STRONG CENTRES DIVERSITY OF USES

DIVERSITY OF USES^{MiM175}

No further A4drinking establishments or A5takeaway uses will be permitted within the defined Primary Shopping Frontage of Brent's town centres, as shown on the Policies Map.

~~Non-A1 or A2 uses will be permitted within town centres where:~~

- ~~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.~~

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.^{MM110}

MEANWHILE USES

The use of vacant/under-utilised sites or buildings for occupation by temporary uses that will benefit a town centre or Growth Area's viability and vitality will be supported. All phased major developments within town centres or growth areas will be required to submit an appropriate Meanwhile Feasibility Study and if feasible, an appropriate Meanwhile Strategy. Proposals for workspace, new markets, including farmers' markets and street-food markets, will be encouraged as well as other seasonal/temporary uses. Temporary entertainment and leisure uses will be supported, particularly those which enhance and promote Brent's heritage and culture.

IMPACT ASSESSMENTS

Proposals involving 500 sqm or above gross retail or leisure floorspace, which are outside of town centres and do not accord with the Local Plan, should be accompanied by an Impact Assessment.

Justification

6.4.27 Brent includes a diverse range of well-functioning town centres, each helping to serve their immediate communities, with some of the larger centres, such as Wembley and Kilburn, serving a wider catchment. There are currently no Metropolitan Town Centres within Brent, however, it is the aspiration of the council to increase the connectivity of both Wembley and Wembley Park Town Centres, and expand their offer to meet the relevant floorspace metrics and gain status as a Metropolitan Town Centre. The existing Town Centre hierarchy is as follows:

- Major centres: Kilburn, Wembley.
- District centres: Wembley Park, Kenton, Preston Road, Burnt Oak, Colindale, Kingsbury, Neasden, Cricklewood, Willesden Green, Harlesden, Ealing Road.
- Local centre: Kensal Rise, Queen's Park, Church End, Sudbury.
- Neighbourhood parades: can be viewed on the planning policy map.

Figure 34 Town centre hierarchy

6.4.28 ~~The policy approach will also be applied in assessing permitted development prior approval applications for change of use of existing town centre uses. The proportion of frontage is to be calculated based on the length of the primary frontage in metres in the centre as a whole. A1 uses are shops, A2 uses are financial and professional services, A3 uses are restaurants and cafes, A4 are drinking establishments and A5 are hot food takeaways.~~ ^{MiM176}

6.4.29 The policy outlines the council's approach to managing primary and secondary shopping ~~areas~~ ^{MiM177} frontages, town centre boundaries, and the mix of uses within frontages. It also states the need for a lower threshold for retail impact studies to take account of recent town centre health checks and the recommendations of the 2018 Retail and Leisure Needs Assessment. The flexible approach taken here will enable the development of a mix of uses, supporting the increasing leisure function of our town centres and enhancing their destination appeal. This will serve to increase the footfall and dwell times within our centres which in turn will support the overall function of the primary shopping frontages.

6.4.30 As referenced in the London Plan and Brent policy BHC4, the night time economy of Wembley has been identified as an area of National/ International importance, and those of Cricklewood, Kilburn ^{MiM178} and Wembley Park as areas of more than local importance. It is therefore of special relevance to these centres that their leisure and entertainment functions are supported and enhanced.

- 6.4.31 Main town centre uses as defined in the NPPF, with particular emphasis on the delivery of leisure and entertainment uses, will be considered acceptable in designated frontage subject to meeting other policy requirements. As an exception the conversion of peripheral secondary frontage to residential development will be permitted where this will not impact on the vitality and viability of the town centre.
- 6.4.32 Frontage will be considered peripheral at the outer edges of secondary frontages which show high levels of vacancy, particularly within a wider centre that is appearing to struggle. Where contraction of the centre is desirable by release of secondary frontage, it shall be done in a controlled manner ensuring that the vitality and viability of existing viable adjacent premises is not undermined. Where it is desirable to maintain an active frontage the strong preference will be conversion to ~~workspace in the B1 use class~~ (office, research and development or light industrial workspace compatible with a residential environment)^{MiM179} at ground floor with residential above.
- 6.4.33 Developers will be required to demonstrate that the unit is unviable by providing evidence. This will be that the unit has been vacant for a year despite an active marketing campaign, or that long term vacancy levels are such that uses could reasonably be relocated elsewhere in the centre. Marketing must be through a commercial agent at a price that genuinely reflects the market value in relation to use, condition, quality and location of floorspace. A professional valuation of the asking price and/ or rent will be required from at least three agents to confirm that this is reasonable.
- 6.4.34 A 'meanwhile use' is the temporary use of vacant buildings or land for a socially beneficial purpose until such a time that they can be brought back into commercial use again. A 'meanwhile use' is not the same as a normal temporary lease or license because it recognises that the search for a commercial use is ongoing.
- 6.4.35 Vacant premises can provide opportunities for start-ups and small local businesses, as well as community groups. As such, where required meanwhile strategies must support the objectives or action plans for the relevant town centre or Growth Area, contributing to the regeneration of the surrounding area, and enhancing the sustainability of the completed development. In particular, for vacant or under-utilised buildings, consideration should be given to the provision of: temporary creative workspace, community facilities, related ancillary or complementary facilities and uses, and cultural venues. Developments which have vacant or under-utilised land, particularly within phased developments, should consider the provision of: pocket parks, community gardens or facilities, workspace and/ or other commercial space/ features that promote community engagement with developers.
- 6.4.36 London Plan Policy SD6 requires the Brent Local Plan to promote and enhance the vitality and viability of the borough's town centres. The council has done this by allowing some flexibility in use where retail units are no longer viable and by placing restrictions to prevent over-concentrations of particular uses.

6.4.37 This preferred approach would restrict conversion from commercial to residential use to units outside of the designated Primary Shopping Area. This would preserve a defined area where retail development is concentrated but pre-empt and prevent future decline by encouraging mixed-use development on the periphery of town centres.

6.4.38 Several centres in Brent would benefit from a shortened high street with a condensed retail offer, strengthening their appeal and viability. This approach would also support efficient and effective land use to respond to local growth pressures and help to meet the council's housing targets.

POLICY BE5: PROTECTING RETAIL IN TOWN CENTRES

BETTING SHOPS, ADULT GAMING CENTRES AND PAWNBROKERS

Betting shops, adult gaming centres and pawnbrokers will be permitted where it will result in:

- a) **no more than 4% of the town centre frontage consisting of betting shops;**
- b) **no more than 3% of the town centre frontage consisting of adult gaming centres or pawnbrokers/payday loan shops;**
- c) **no more than 1 unit or 10% of the neighbourhood parade frontage, whichever is the greater, consisting of betting shops, adult gaming centres or pawnbrokers/payday loan shops;**
- d) **a minimum of 4 units in an alternative use in-between each.**

TAKEAWAYS

Subject to other policies within the development plan, takeaways will be approved except where they would result in:

- a) **The introduction of any new ~~A5~~takeaway use within the designated primary frontage of a town centre;**
- b) **an ~~A5 use~~takeaway within 400 metres walking distance of a primary school, secondary school or further education establishment entrance/ exit point;**
- c) **more than 6% of the units within a town centre frontage in ~~A5 uses~~ being takeaways;**
- d) **more than 1 unit or 15% of the units within a neighbourhood parade, whichever is the greater, in ~~A5 use~~ being takeaways ;**
- e) **less than ~~three~~ two non-~~A5~~takeaway ^{MM112} units between takeaways; or**
- f) **on-street parking in front of the premises creating highway safety problems.**

SHISHA CAFÉS

Shisha Cafés will only be permitted outside 400 metres walking distance of a school with a secondary school element or further education establishment entrance/ exit point.

Justification

- 6.4.39 To ensure there is not an over-concentration of particular uses within any single length of frontage the policy seeks to prevent adult gaming centres, pawnbrokers, betting shops and takeaways locating in close proximity to a unit in the same use.
- 6.4.40 The NPPF states planning policy is to take account of and support local strategies to improve health, social and cultural wellbeing. Local studies have found that takeaways and shisha cafés are impacting negatively on the health of Brent residents, particularly young people. Accordingly, to support local health strategies, this policy sets a limit on the proximity of these uses to secondary schools and further education establishments.
- 6.4.41 Brent's town centre health checks indicate in the borough pawnbrokers often also provide a payday loan service, and these uses are often indistinguishable from each other, therefore for the purposes of this policy the term pawnbroker is inclusive of payday loan companies.
- 6.4.42 Further education establishments are those which deliver compulsory education for people over 16.
- 6.4.43 The need to prevent an over-concentration of takeaways is supported by national and regional policy as well as a growing evidence base. This is due both to health implications and to preserve the primary retail function of Brent's town centres. While it is acknowledged that takeaways provide a convenience service to local communities, the retail-based role of town centres must be preserved and so an upper limit of 6% of units in a centre's frontage being in ~~A5 use~~ takeaways has been set as well as a restriction on any new ~~A5 uses~~ takeaways ^{MiM180} within the designated primary frontage of a centre. This approach allows takeaways to locate within town centres without jeopardising the retail function.
- 6.4.44 In order to prevent an over-concentration of ~~A5 use~~ takeaways within the secondary frontage of the borough's town centres there is a requirement to have no less than three non-~~A5 use~~ takeaways ^{MiM181} between takeaways. This will maintain a diverse and viable high street offer and restrict impacts on amenity.
- 6.4.45 London Plan Policy E9 places restrictions on development proposals containing ~~A5~~ hot food takeaway uses. Any new ~~A5 uses~~ takeaways ^{MiM182} within 400 metres walking distance of an existing or proposed primary or secondary school should be refused.

POLICY BE6: NEIGHBOURHOOD PARADES AND ISOLATED SHOP UNITS

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^{MM113} frontages, and the parade or unit is within 400 metres of equivalent alternative provision and;

- a) **is unviable; or**
- b) **the proposal will provide a community facility for which there is a demonstrable need.**

Where there is no equivalent alternative provision within 400 metres, loss will not be permitted unless retention is unviable for these range of uses with associated evidence to show that the premises have been vacant and actively marketed for a minimum of 2 years.

Where permitted, sympathetic retention of any existing shop front will be required unless a high quality alternative more sympathetic to the building's qualities or street scene will be delivered.

Justification

6.4.46 Outside of town centres, neighbourhood parades and isolated shop units provide convenient access to goods and services which are needed on a day to day basis. To promote sustainable communities, the loss of ~~retail and services~~ such premises^{MiM183} will be resisted in under-served areas.

6.4.47 In determining applications for planning permission and change of use permitted development to residential prior approvals, development resulting in the loss of ground floor local ~~retail commercial, business~~ and service provision will not be permitted unless there is alternative equivalent provision within 400 metres. This is considered a reasonable walking distance (5 minutes for the average person) to access convenience shopping and local services. In the context of prior approval permitted development, a 'Key Shopping Area' is considered to be any area within a designated town centre frontage or a neighbourhood parade, as defined on the policies map.^{MiM184} Provision will be considered equivalent where it provides a similar offer which meets the same need, such as the need for fresh food or a financial service. Marketing evidence will be required demonstrating an active marketing campaign, at an appropriate rent (providing examples of 3 comparable shop unit rents within the vicinity), for a continuous period of at least 2 years whilst the premises were vacant or in 'meanwhile use', which has shown to be unsuccessful. A change of use to a community facility such as a community centre will be permitted where it can be demonstrated there is a need for such provision. Demonstration of need must include evidence of consultation with service providers and the local

community and an audit of existing provision within the local area. Weight will also be given to the prospect of the commercial use of the site becoming viable with any anticipated future population growth within the surrounding area. This will be particularly relevant in the borough's Growth Areas, for which there will likely be an emerging need.

6.4.48 To protect the viability of the remaining retail commercial, business^{MiM185} and service units within a parade, consideration will be given as to whether or not the proposal incurs a breakage in the parade's frontage.

6.4.49 Where a loss of commercial, business retail or local service to uses other than community uses^{MiM186} is allowed, the most appropriate alternative use would be housing. In considering applications for alternative uses, particular regard will be given to the possible effect on the amenity of adjoining residential properties. The council's Shopfronts SPD3 (June 2018) provides further guidance on sympathetically converting shops to residential units.

POLICY BE7: SHOP FRONT DESIGN AND FORECOURT TRADING

Proposals for shop fronts and forecourts will be required to retain shop fronts of architectural or historic merit, demonstrate a high quality of design, complementing the building and adjoining properties.

Forecourt trading will be permitted where it does not cause an obstruction to pedestrians or nuisance to neighbouring residential occupiers.

Justification

6.4.50 Shop fronts play a key role in establishing the character of Brent's town centres and neighbourhood parades. Policy BE7 is to ensure shop fronts and forecourts contribute to an attractive environment. It is supplemented by detailed guidance in the Shopfronts SPD3 (June 2018).

6.4.51 The council will take enforcement action on shop owners if the visual amenity of frontages is not maintained within acceptable standards.

POLICY BE8: MARKETS AND CAR BOOT SALES

The council will protect and promote markets by:

- a) resisting the permanent loss of existing retail market sites unless comparable provision is made or there is no demand for continued market use;**
- b) supporting the improvement of existing retail markets, including storage and preparation space for traders to meet public health requirements; and**
- c) giving favourable consideration to proposals for new markets in town centres which help diversify provision.**

Planning permission for new markets and car boot sales will be subject to a Management Plan being agreed by the council.

Justification

6.4.52 Markets can make an important contribution to the vitality of town centres and therefore are to be retained and enhanced. However, if poorly designed or managed, markets and carboot sales can cause harm to surrounding areas. This policy establishes the factors the council will consider when determining an application for such uses.

6.4.53 Applications for markets and carboot sales must be accompanied by site layout plans and Management Plans. For carboot sales the layout plan should indicate vehicle trading areas, maximum number of vehicles, spacing and aisle widths. Management Plans must include details of time and duration of the sale, arrangements for marshalling access, parking, servicing, safety measures and signage, with arrangements for the display and/or collection of sellers' details.

6.4.54 Management Plans for the operation of such sales should satisfactorily address the following considerations:

- a) The proposal should include adequate arrangements for the storage and/ or collection of waste during the sales, as well as its disposal afterwards;
- b) The scale of activity, in terms of the number of pitches, is not excessive in relation to the scale of the centre;
- c) Any additional traffic generated by the sales would not cause unacceptable impact on the existing road network nor constitute a safety hazard;
- d) The access and parking arrangements for both trading and customer vehicles would not cause noise disturbance to nearby residents at unsociable hours; and
- e) In the case of carboot sales that provision for the parking of all trading vehicles is made on-site.

6.4.55 Any permission granted for carboot sales would be for a limited period only (normally 18 months) and subject to a condition waiving an appropriate proportion of permitted development rights on the cessation of the planning permission. In all cases, permission will be made personal to a named person or persons, to ensure the responsibility and arrangements for the operation of the sale do not change without the knowledge and express consent of the planning authority.

6.4.56 In addition to planning controls, the council manages proposals for new markets through its role in determining applications for street trading licenses.

POLICY BE9: VISITOR ACCOMMODATION AND ATTRACTIONS

Future hotel provision will be encouraged in the two major town centres of Wembley and Kilburn. In addition to sites allocated in this plan, hotels and other visitor

accommodation will be appropriate in town centres in accordance with the sequential approach, and will be supported provided they:

- a) do not significantly compromise the supply of land for new homes on allocated housing sites and the council's ability to meet its housing targets;**
- b) are inclusive and accessible, with applications for detailed planning permission accompanied by Accessibility Management Plans;**
- c) are not occupied by any resident for 90 consecutive days or more; and**
- d) create active ground floor frontages.**

Justification

6.4.57 Hotels are classified by the NPPF as a main town centre use and the provision of a good range of hotel facilities is important in attracting visitor spend which can have potential spin-off benefits for town centres in instances where a hotel is well-sited within a centre in proximity to complementary uses such as bars and restaurants.

6.4.58 The GLA has forecast future demand for serviced accommodation by borough, identifying a requirement for 2,622 net additional serviced accommodation rooms in Brent over the period 2015-40.

6.4.59 Hotels and visitor accommodation are encouraged in Wembley town centre to further strengthen existing provision and support the area's role and function as a destination for sports and entertainment. In Kilburn there is relatively limited provision at present given its proximity to central London. The development of additional hotel/ visitor accommodation facilities would further diversify the offer of the centre and potentially generate additional footfall and spend for existing businesses. It is important that where its ground floor faces a public space that it has an active ground floor frontage.

6.4.60 In addition to hotels, visitor accommodation includes: aparthotels, guesthouses, bed and breakfast accommodation, self-catering facilities and youth hostels. Conditions will be applied to ensure visitor accommodation is managed appropriately as short term accommodation and rooms are not occupied for periods of 90 days or more.

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.^{MM114}

6.4.61 Design and Access Statements are to be sufficiently detailed to demonstrate that inclusive access is integral to the design and, in the case of hotels, an adequate choice of accessible room types is provided to all customers. Applications for hotel development are required to be accompanied by an Accessibility Management Plan (AMP) to demonstrate that the management and operation of accessible rooms is considered from the outset of the design. An AMP is distinct from a Design and Access Statement as its purpose is to ensure accessibility and inclusion are monitored and maintained throughout the life of the development. Both are to be prepared in keeping with the criteria set out in the Mayor's Town Centres SPG.

EVIDENCE BASE

Brent Employment Land Demand Study 2015, URS

Brent Workspace Study 2017, Regeneris

West London Employment Land ~~Review~~ Evidence 2019, GL Hearn

~~West London Affordable Workspace Study, 2019~~ Avison Young

Brent Retail & Leisure Need Assessment 2018, Urban Shape

Brent Industrial Land Audit and Intensification Analysis^{MiM188} 2019, Brent Council

6 Themes

6.5 ^{MiM189} Heritage and Culture

Where we are?

- 6.5.1 Brent has a comparatively low number of recognised heritage assets in the context of London, as identified in the Brent characteristics section. On a planning policy basis, the council considers that national planning policy, the London Plan and Brent's current Local Plan policy "Brent's Heritage Assets" provide sufficient support and clarity in the determination of applications that have the potential to impact on heritage assets.
- 6.5.2 The council ~~is preparing~~ has prepared ^{MiM190} an Historic Environment Place-Making Strategy which will enable a programme of review of heritage assets within the borough. This is not just an exercise in listing known buildings and areas. It also attempts to provide an understanding of their value to society (their significance), their physical conservation status, the contribution of their settings, scope for enhancement and their potential to contribute to the delivery of other sustainable development and place making objectives. The Strategy looks at Brent's Listed Buildings, Heritage at Risk, Historic Parks and Landscapes and Archaeology. In particular, it reviews conservation areas and considers whether their boundaries are correct. In some cases, there may be justification for extension or potential de-designation. In addition, there are some areas in the borough considered likely to be of sufficient merit to warrant conservation area status.
- 6.5.3 For some areas there is a need to provide greater advice within the associated conservation area design guides. This will be related to the types of development that are popular in the area that might currently be refused that, with amendment consistent with the character of the conservation area, might be viewed acceptable. The Local List has partly been updated and includes a better description of assets included on it. This will allow a better understanding of the architectural/historic elements that need to be taken account of in any development proposal.
- 6.5.4 Whilst not yet a listed building due to its age, the National Stadium Wembley is of national cultural significance. Recognising its importance, views to it have been protected in current planning policy and this will continue. Although the prospect of its sale has receded for now, a potential for change in ownership of the stadium brings both opportunities and risks. Protecting the stadium's status as a premium location for football in particular but also other significant cultural events is necessary. As it grows older it will face increased competition from newer purpose built stadia in England and also abroad.
- 6.5.5 Brent has for some time been an area which has been subject to extensive levels of in-migration from different waves of ethnic groups. This role is embraced and seen by residents, the majority of whom are from minority ethnic backgrounds, as a positive thing. In addition to heritage assets, the diversity of Brent's population obviously creates a rich cultural environment; a key element of its recognition as London Borough of Culture 2020. This cultural wealth has been reflected spatially in some of its buildings, uses and places, e.g. creation of places for worship which more recently has been for ornate temples or mosques, Irish pubs and music venues from the 1950s in areas such as Kilburn and Wembley and reggae in Harlesden from the

1960s. Much however is more spontaneous and occurs on a day to day basis in everyday, in homes, streets and schools rather than special places. As such dedicated cultural facilities are comparatively rare in Brent.

- 6.5.6 Continual changes in the ethnic composition of the population can present pressures around continued use /viability of some cultural institutions. This is compounded by high values of land and buildings, especially as a result of competition/potential for residential development. The commercial pressure in particular can make it difficult for new cultural facilities or associated creative industries/types to be established. Historically these have often have relied on colonising buildings or areas neglected by the market. Lack of suitable premises is limiting the potential cultural expression and wider social value that Brent's diverse population can bring. The council has been successful in negotiating affordable/creative workspace in association with new developments, such as in Alperton and Wembley Growth Areas.
- 6.5.7 The London Plan through policy HC6 Supporting the Night Time Economy seeks to maintain and improve its status, particularly across a number of important centres in London. Brent's night time economy has a symbiotic relationship with cultural industries, both supporting and being reliant upon them. 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. The council is working on a night time economy strategy for Kilburn High Road. This is in recognition of its wider importance historically as a destination for and concentration of a music/entertainment industry cluster. It is also in order to seek to stop and ideally reverse its more obvious recent decline. This is also in addition to but complementary to the town centre strategy/action plan for the centre. Each of the other locations are also priority town centres which will have supporting action plans.
- 6.5.8 In relation to cultural facilities, pubs long recognised as community and cultural hubs have been in severe decline over the last two decades in particular. Brent has been no different in this respect to London. If anything, the ethnic diversity of the borough may well have been a more significant contributing factor, particularly away from high streets/retail parades. In recognition of the adverse impact and also to protect pubs from being displaced by more valuable uses such as housing, the Brent Local Plan contains a Public Houses protection policy, as does the London Plan in policy HC7 Protecting Public Houses.

Where do we want to be?

- 6.5.9 In terms of heritage and cultural assets, the council wants to continue to encourage listed buildings and other designated and non-designated heritage assets to be valued in the development process. Heritage and cultural assets can have great value in creating local distinctiveness and a sense of place. For heritage assets, as a minimum the council seeks to ensure new uses, extensions or new build preserves them or their setting and ideally enhances it. The same should be applied to cultural assets, the most prominent example of which is the national stadium. There are already protected views of the stadium from shorter and longer distances which new development has had to take account of to ensure that the important views are not compromised. The council will seek to continue to protect these views. It will also seek to protect and enhance the architectural integrity of the stadium to ensure like other significant cultural assets, e.g. Royal Festival Hall, it will retain its functional

relevance as a viable facility, but that any changes undertaken do not compromise its architectural purity.

- 6.5.10 In relation to the future of the national stadium the council wants to continue its role as the preeminent location for football in England. It also recognises that internationally the stadium will increasingly be competing with newer stadia for events. As happened with the old stadium, it will need to adapt over time to meet changing needs. A different owner may also be more likely to pursue the option of more, larger scale capacity events than is currently allowed. As the temporary arrangement with Tottenham Hotspur showed, the council will consider and be supportive of change where it can be certain that this will bring benefits that outweigh adverse impact. In moving forward it wants to strike a balance to retain the premier facility status. This will ensure that the venue's policy should not restrict change to such an extent that its comparative attractiveness for event organisers/users is undermined. This will however only be where mitigation measures put in place can show that impacts do not cause significant harm.
- 6.5.11 London Plan policy HC5 Supporting London's Culture and Creative Industries provides a sound overall basis on which to determine planning applications for the creation or loss of cultural facilities. It encourages boroughs to identify Creative Enterprise Zones, ~~which was~~^{MiM191} a Mayor initiative with associated funding. Brent bid for Willesden Green to be a Creative Enterprise Zone but was not successful. It is not clear if the Cultural Enterprise Zone initiative will continue. If it does the council may well seek to identify other areas where there is potential.
- 6.5.12 As indicated there is a specific action plan for the night time economy in Kilburn, whilst the other important night time economy areas are supported as part of town centre action plans. It is considered that these in association with a policy in the Brent Local Plan which supports the retention of and promotion of new night time economy uses in these centres should be sufficient.
- 6.5.13 In relation to pubs, ~~the Council wants to continue in seeking their protection or ensuring appropriate re-provision in developments. from a planning policy perspective the existing Brent policy appears to be working well. Whilst there is a draft London Plan which contains a policy that seeks to protect public houses, it is not considered to be as detailed and therefore as robust as Brent's, so it is proposed to essentially take Brent's existing policy forward in its current form.~~^{MiM192}

LONDON PLAN

HC5 Supporting London's^{MiM193} culture and creative industries

HC6 Supporting the night time economy

POLICY BHC1: BRENT'S HERITAGE ASSETS

Proposals for or affecting heritage assets should:

- a) demonstrate a clear understanding of the archaeological, architectural or historic significance and its wider context;**
- b) provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the development on the heritage asset and its context as well as any public benefit;**
- c) ~~retain buildings, structures, architectural features, hard landscaping and spaces and archaeological remains, where their loss would cause harm~~**

- c d) sustain and or enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the streetscene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating;**
- d 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;**
- e) 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.**
- f) where demolition is proposed ~~within a conservation area~~^{MM115} 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 permitted conditions and/or legal agreements will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures.**

Justification

- 6.5.14 Brent's heritage assets make a substantial contribution to the borough's local character and distinctiveness. They are a unique and irreplaceable resource which justifies protection, conservation and enhancement in a manner appropriate to their significance. The council recognises and identifies both designated and non-designated assets through the plan making or planning application process. It is acknowledged that they hold value to society at many levels and identification allows protection and consideration in planning decisions.
- 6.5.15 Brent's statutory listed buildings, conservation areas and registered parks and gardens are all designated heritage assets. Brent's Local List, areas of distinctive residential character, sites of archaeological importance and archaeological priority areas are non-designated heritage assets identified as having a degree of significance meriting consideration in planning decision stage. Guidance on Brent's heritage assets, as set out below, is available at www.brent.gov.uk/conservation and will be a material consideration in the determination of applications for development. Applicants should refer to it early on to ensure that their proposals are based on an understanding of the significance of heritage assets that may be affected.
- 6.5.16 The areas of distinctive residential character are places which the council has identified as having the potential for conservation area status. It will seek to ensure that their character is not diminished prior to the necessary statutory processes being undertaken. This process will be prioritised as set out in the Historic Environment Place-Making Strategy.

- 6.5.17 The purpose of this policy is to provide greater clarity on the specific additional requirements applicable in Brent taking account of existing NPPF, NPPG London Plan, Brent Local Plan policies and local evidence base.
- 6.5.18 Brent's heritage assets include a wide range of architectural styles from Victorian Italianate, Gothic Revival, suburban 'Arts & Crafts', 'Tudorbethan', 'Old World', Modern and Brutalist as well as planned 'village' settlements. Furthermore, its formal public gardens, cemeteries together with the trees and gardens in the 20th century residential developments have matured contributing to setting. Its archaeological discoveries to date^{MiM194} are scarce; sites have been built over and there are limited places where archaeologists could investigate. Records suggest existence of settlements from prehistoric times meaning new discoveries would be significant partly because so little is known.
- 6.5.19 Heritage assets are valued by the public as established and tangible evidence of the last culture, providing a sense of permanence and belonging. Once lost or detrimentally altered, heritage assets cannot easily be reinstated. It is important that the most valuable are not needlessly or inadvertently destroyed. Policy ~~BD1~~ BHC1^{MiM195} therefore, specifically seeks to protect Brent's heritage. It ensures that the case for conservation and enhancement is fully considered when assessing all proposals for development. It also seeks to safeguard the potential for further investigation on sites and buildings where the heritage asset's significance may be previously undiscovered. Archaeological Priority Areas and Archaeological Sites indicate where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. However, sites of archaeological importance could be discovered elsewhere in the borough.
- 6.5.20 The council supports and recognises that change is necessary, but needs to not compromise heritage significance and exploit opportunities for enhancement. Any proposal must have special regard to the desirability of preserving a heritage asset or its setting or any features of special archaeological, architectural or historic interest. When granting consent, special regard will be given to matters of detailed design, especially within main frontages, prominent elevations and roofs, and to the nature, quality and type of materials proposed to be used. Even small scale development proposals, including extensions, roof extensions, dormers and outbuildings and potentially the most minor changes or incremental alterations (such as window replacement and the loss of original fittings) will be unacceptable if overly dominating or otherwise causing harm to character, integrity or appearance.
- 6.5.21 Special regard will be given to proposals near or affecting heritage assets identified as at risk on Historic England's Heritage at Risk Register. The council will use its development management and other planning powers to secure the future viable use of the borough's heritage assets. For archaeological assets, the layout of the development, extent of basements and design of foundations may need to provide for physical preservation. If significant archaeological remains are not to be preserved in-situ then appropriate investigation, analysis, publication and archiving will be required.
- 6.5.22 When considering any planning application (including demolition) that affects a conservation area the council will require the retention of all buildings and structures which make a positive contribution to its significance. Similarly new proposals must pay special attention to the desirability of conserving or enhancing the character and

appearance of that area. This can be achieved either by a positive contribution or by development which leaves character and appearance unharmed, that is to say conserved. Development located within, adjacent to, or otherwise affecting the setting of a conservation area, will be permitted where the visual and functional impact of the proposals can be demonstrated to conserve or enhance:

- a) the distinctive characteristics of the area, including important views into and out of the area
- b) the general design and layout of the area, including the relationship between its buildings, structures, trees and characteristic open spaces; and
- c) the character and setting of the buildings and other elements which make a positive contribution to the appearance and special character of the area. Development involving demolition in a conservation area will only be supported if a befittingly-designed replacement has been granted planning permission with appropriate mitigation measures in place to ensure the replacement is constructed.

6.5.23 The council will also require the identification of non-designated heritage assets, including building or structures contained on the Local List, archaeological priority areas, areas of distinctive residential character, sites of archaeological importance and sites contained within the London Parks & Gardens Trust's Inventory of Historic Spaces at the beginning of the design process for any development, especially where this may impact on their significance.

6.5.24 The council will resist ~~significant harm to or loss of~~ in the first instance to designated 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. Substantial harm or loss should be exceptional, especially where the asset is of high significance. Where the harm ~~would be~~ is considered to 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~~ its significance of the conservation area.^{MM116} 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.

6.4.24a It should be noted that identification ~~designation~~ as a Locally Listed Building does not provide further statutory protection where it is not in a conservation area but it draws attention to the special architectural, historic, streetscape and design qualities of the building. Development proposals that affect non-designated heritage assets will be required to demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset. Planning permission may be granted in cases where a proposal could result in harm to or loss of a non-designated heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance. A balanced approach will be taken. Where it is accepted by the Local Planning Authority that demolition is acceptable, recording of the heritage asset should be undertaken. Replacement buildings should draw upon the heritage elements of the previous design that made it significant within a suitable time frame. This may include the special qualities listed above.^{MiM196}

Planning Application Requirements

- 6.5.25 Outline planning applications are not acceptable in conservation areas as full details of the proposed development are required to make a decision.
- 6.5.26 A Heritage Statement is required where a proposal is for or affects a heritage asset. It must describe and demonstrate a clear understanding of the significance of any heritage assets affected by proposals and the impact on their significance, including any contribution from their setting. The level of detail must reflect the importance of the asset and clearly identify the potential impact of the proposal. Where development is proposed for a site which includes or has the potential to include heritage assets with archaeological interest, developers must submit an appropriate desk-based assessment and, where necessary, a field evaluation in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works. Applicants should consult with Historic England's Greater London Archaeological Advisory Service in order to determine the scope of the archaeological requirements. ^{MiM197}

LONDON PLAN

Policy HC1 Heritage Conservation and Growth

BRENT GUIDANCE

Conservation Area Assessments and Design Guides

Brent Local List

POLICY: BHC2 NATIONAL STADIUM WEMBLEY

Development must not be to the detriment of the following views as shown on the Policies Map of the National Stadium Wembley:

- 1. Barn Hill, Wembley**
- 2. Elmwood Park, Sudbury**
- 3. Horsenden Hill, Perivale**
- 4. One Tree Hill, Alperton**
- 5. Welsh Harp Reservoir**
- 6. Wembley Park Station**
- 7. The Bobby Moore Bridge**
- 8. Olympic Way North of Fulton Road**
- 9. Chalkhill Park, Wembley**
- 10. Metropolitan & Jubilee Line north of Neasden Station**
- 11. Great Central Way**
- 12. South Way at the River Brent Bridge**
- 13. The White Horse Bridge**
- 14. Neasden Station, Neasden Lane**
- 15. North Circular Road/Harrow Road junction**
- 16. West Coast Mainline Stonebridge**
- 17. Abbey Road/Grand Union Canal Park Royal**

Proposals that contribute to the national stadium's continued success as a world renowned location for sport and cultural events will be supported.

Proposals which increase the frequency and volume of use of the national stadium beyond existing consents will be required to mitigate potential adverse effects to acceptable levels.

Proposals that adversely impact on the national stadium's ability to be the premier nationally recognised location for England's national football teams and any world, European, national, association, league or non-league football finals or games of similar significance will be refused.

Development must preserve and enhance the architectural integrity of the national stadium.

Justification

- 6.5.27 London Plan Policy HC3^{MiM198} Strategic and Local Views requires local plans to clearly identify important local views. It advises boroughs to use the principles of HC4 London View Management Framework for the management of local views.
- 6.5.28 The National Stadium Wembley is an iconic building of national cultural significance, pride and international renown, principally for football. The stadium's size and height, in particular that of its impressive white lattice arch, combined with its elevated position mean that it is very prominent from numerous points locally. It is also visible from much of London. Since the start of its construction the council has sought to protect more immediate and wider views to it from across the borough on account of its wider cultural significance, function as a landmark/reference point and the role that clear views to it play as part of the whole experience of excitement and anticipation of people attending an event. This has and will include limiting building heights immediately adjacent to no more than the stadium's shoulder height.
- 6.5.29 17 views have been identified. Two views originate outside the area where the Council is Local Planning Authority. The Council has made OPDC and LB Ealing aware of each view's origins and it will be for them to determine the weight to give to the importance of the views when considering proposed development in their respective areas.^{MiM199} London Plan policies and associated Supplementary Planning Guidance set out the key principles and methodology for information that needs to be supplied to support development proposed which could impact on views and the key considerations in determining whether it is acceptable.
- 6.5.30 The cost of the stadium to construct and operate together with its initial design attributes to accommodate a wide range of sporting and cultural events has meant that it was always anticipated that it would be used for more than just nationally and internationally important football games. Notwithstanding this, the funding of the stadium and associated agreements together with the Football Association's role as owner/occupier and national custodian of the game meant that football would be given prominence over other uses. Any different ownership of the stadium potentially raises issues around football's priority, in terms of number and stature of games accommodated, the range of other events sought, desire to increase higher capacity attendances and the need for the stadium to adapt for new sports. In addition, the older the stadium gets, there is an increasing potential for it to need to change to retain its competitiveness against other stadia or cultural venues.
- 6.5.31 The policy seeks to protect the preeminent position of the stadium at a global level as a renowned location for sport and cultural events, but ensure that its status in

particular in relation to football in England is not diminished. The owner/custodian of the stadium needs to be supported to ensure the on-going commercial success which allows continued investment in the facility. The council recognises the benefit that the stadium brings overall to the residents and businesses of Brent, and its role in raising the profile of Wembley across the world. Nevertheless, Brent's population and number of businesses is growing, particularly in the vicinity of the stadium. To protect them, conditions were placed on the rebuilt stadium's original planning permission which limited the number of events annually with an attendance of over 50,835 to 37 (22 sports and 15 non-sports). The council supports the 'agent of change' principle and has ensured that development in the vicinity of the stadium pays suitable regard to its operation. Nevertheless, the cap on high capacity events was in place for good reasons and the council will when required use this control to ensure that there are no unacceptably adverse impacts from changes to the stadium's types of activities, their frequency or duration.

- 6.5.32 In addition to protecting the views to the stadium, the policy also seeks to protect and enhance the architectural integrity of Sir Norman Foster's design. This will be from the impact of both small and large scale proposals taking account of the potential for adverse cumulative change over time.

LONDON PLAN

Policy HC3 Strategic and Local Views

Policy HC4^{MiM200} London View Management Framework

London View Management Framework Supplementary Planning Guidance

POLICY BHC3: SUPPORTING BRENT'S CULTURE AND CREATIVE INDUSTRIES

Working with others the council will through all its activities and affordable workspace and town centre action plans ensure that creative industries are supported through the development of improved and additional creative workspaces, cultural facilities and other mutually complementary uses. Existing clusters of creative workspaces in Harlesden, Kilburn, Willesden Green, Queen's Park and Wembley will be protected and promoted.

Justification

- 6.5.33 The council consistent with the Mayor's policy on creative enterprise zones seeks to build on the work of the area's current creatives and cultural facilities to promote better opportunities for such activities to thrive. This will support educational, economic and cultural enrichment, but also add to the vibrancy, sense of place, and relevance of the area in people's lives as part of the rich tapestry of positive experiences associated with the diversity within Brent and London.
- 6.5.34 Consistent with London Plan policy HC5 criterion c) the council will support such areas through allowing development that furthers the provision of temporary and permanent creative workspace, related ancillary or complementary facilities and uses and cultural venues which support the objectives and action plans for the zone. The areas of Alperton, Harlesden, Kilburn, Queen's Park, Wembley and Willesden Green are those where existing or creative industries are congregated or where the Brent Workspace Study indicates there is likely to be strong demand. As such the council will through its employment policies, town centre action plans and also its affordable

workspace strategy seek to support the retention of and provision of more creative industries' space.

LONDON PLAN

Policy HC5: Supporting London's Culture and Creative Industries

LOCAL PLAN

Brent Policy BE1 Economic Growth and Employment Opportunities for All

Brent Affordable Workspace Strategy

Brent Town Centre Action Plans

POLICY: BHC4 BRENT'S NIGHT TIME ECONOMY

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.

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. ~~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 would undermine it will be refused.~~ 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.^{MM117}

Justification

- 6.5.35 The centres of Wembley, Kilburn High Road, Cricklewood and Wembley Park are all identified as being of more than local importance for the night time economy by the London Plan. In the case of Wembley this is of national/international importance, principally as a result of the National Stadium and SSE Arena, although Boxpark (a meanwhile use) also is a significant draw for its mixture of food, drink and entertainment. These venues and the concentration of large hotels provide significant patronage for the extensive food and drink offer at Wembley Park. Cricklewood has a wide range of eating and drinking establishments, the same is true of Kilburn High Road which is home of the Kiln Theatre and also recognised for its live music/comedy venues usually associated with public houses.
- 6.5.36 The council recognises the function that these centres play and that ensuring a successful night time economy covers a multiplicity of council functions as well as many other public agencies, the private sector and other groups. Each area is subject to a council town centre action plan which will address the night time economy. Kilburn has been prioritised through a night time economy action plan due to its recent history of loss of music venues. London Plan Policy HC6 Supporting the Night Time Economy provides greater detail on key considerations for planning decisions.
- 6.5.37 It is important that night time economy activities and venues are fully inclusive and accessible to support Brent and London's diversity as set out in the Mayor's Culture and the Night Time Economy Supplementary Planning Guidance. It is also important

that impacts on local amenity are assessed in accordance with other policies in the London Plan and Local Plan.

LONDON PLAN

HC6 Supporting the Night Time Economy

BRENT

Kilburn High Road Night Time Economy Action Plan

Wembley Town Centre Action Plan

Kilburn High Road Town Centre Action Plan

Cricklewood Town Centre Action Plan

POLICY: BHC5 PUBLIC HOUSES

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:

- a) **its continued use as a pub or as an alternative community facility ~~within the D1 use class~~^{MM118} is not economically viable as demonstrated by meeting the marketing requirements as set out in paragraph 6.5.39;**
- b) **the proposed alternative use will not detrimentally affect the character and vitality of the area and will retain as much of the building's defining external fabric and appearance as a pub as possible;**
- c) **the proposal does not constitute the loss of a service of particular value to the local community; and**
- d) **if registered as an Asset of Community Value the premises can be shown to have been offered for sale to local community groups and no credible offer has been received from such a group at a price that is reflective of the condition of the building and its future use as a public house. The Council will treat registration as an Asset of Community Value as a material planning consideration.**

Justification

6.5.38 In recent times Brent has seen an increase in conversion of public houses to other uses. This is of concern to the council as public houses can make a valuable contribution to the community by adding character to the area and providing employment and a place for social interaction. Many public houses provide space for evening classes, clubs, meetings or performances. As such, and in keeping with the NPPF, public houses are classed as social infrastructure and proposals which would result in their loss will be subject to this policy. This supplements the London Plan policy HC7 Protecting Public Houses. In addition, due to the contribution public houses make to the borough's local character and distinctiveness, policy BHC1 Brent's Heritage Assets will normally apply. Whilst pubs have been in decline overall, in some other parts of London, with the increase in popularity of 'craft beers' new pubs have also more recently opened. Should there be sufficient commercial interest in

opening new pubs in Brent, the Council would be supportive, in accordance with the national 'sequential test' prioritising their location within town centres.^{MiM201}

6.5.39 Where applications for a change of use or redevelopment of a public house are received, to make an assessment against criteria in policy BHC5, the council will require evidence that:

- a) the public house has been marketed for 24 months as a public house and for an alternative local community facility, at a price agreed with the council following an independent professional valuation (paid for by the developer) and there has been no interest in either the free-or lease-hold either as a public house in the first instance or as a community facility for provision of medical or health services, crèche, day nursery or day centre or learning and non-residential institutions falling within 'D1' use class;^{MiM202}
- b) the public house has been offered for sale locally, and in the region, in appropriate publications and through specialised licensed trade agents;
- c) all reasonable efforts have been made to preserve the facility, including all diversification options explored – and evidence supplied to illustrate this;
- d) the CAMRA Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes demonstrate that the public house is no longer economically viable;
- e) there has been public consultation to ascertain the value of the public house to the local community;
- f) an assessment has been made of alternative licensed premises within easy walking distance of the public house; and whether such alternative premises offer similar facilities and a similar community environment to the public house which is the subject of the application.

LONDON PLAN

Policy HC7 Protecting Public Houses

BRENT

Policy BHC1 Brent's Heritage Assets

6 Themes

6.6 Green Infrastructure and Natural Environment

Where we are?

6.6.1 There is 637ha of green space and approximately 42 hectares of water space within the borough. This provision takes a range of forms, which includes public parks, canals, rivers, allotments, sites of interest for nature conservation, local nature reserves and cemeteries. In comparison to some other areas of outer London, the borough has a lower percentage of green space.

Public Parks and Open Spaces

6.6.2 Brent currently has 103 public parks, which are of various sizes and typologies. They cover 463 hectares, equivalent to 1.39 hectares per 1,000 population. This is well above the national FiT (Fields in Trust) target of 0.8 hectares of parks and gardens per 1000 population. **MiM203** If the current level of provision per person were to be maintained, an additional 86.4 hectares of public parks would be required to 2041.

6.6.3 Since the previous Local Plan, progress has been made in improving open space accessibility. Figure 35 however demonstrates, there are still areas not within 400m of any public park. When each different public park typology¹ is looked at individually, significant variations in distribution occur. In particular, there are limited amounts of pocket parks within the west and no provision of either district or metropolitan parks to the south.

Figure 35 – Open Space Deficiency

6.6.4 At a ward level, variations in public park provision are significant; ranging from 0.046 to 6.54 hectares per 1,000 population. Overall, the majority of wards fall below the borough average. Only 6 wards have equivalent or higher provision.

6.6.5 The quality of public parks and open spaces varies significantly. The Brent Open Space Qualitative Assessment 2017 found that this can be attributable to a number of factors. These include the presence of litter, quality of infrastructure and equipment and perception of safety.

Urban Greening Factor

6.6.6 London Plan policy G5 sets minimum standards of green infrastructure provision within developments, through an 'urban greening factor'. The main form of urban greening within major residential developments is open space/landscaping and green roofs. Green walls within the borough to date are limited in number.

Trees

6.6.7 The borough's tree stock contains a wide variety of tree species of different age-classes. Locations include public parks, woodlands, streets/public realm, Sites of Importance for Nature Conservation, gardens and landscaping in developments. The 18,000 street trees form a significant proportion of the tree stock. Where possible, opportunities to increase the amount of streets trees are pursued. Approximately 380

¹ Typologies of public park provision have been defined using the London Plan Public Open Space Categorisation

street trees were planted in 2016/17, 400 in 2017/2018 and 800 in 2018/2019. Over 260 tree preservation orders (TPOs) protect a range of individual, groups and areas of trees.

Sites of Special Scientific Interest and Sites of Importance for Nature Conservation

- 6.6.8 Brent has no nature conservation sites of international importance. At a national level the Brent Reservoir is a Site of Special Scientific Interest (SSSI). It is 69 hectares and in a favourable condition.
- 6.6.9 There are 62 Sites of Importance for Nature Conservation, covering a range of habitats, for example woodlands and hedgerows, grasslands, wetland and rail side. The Review of Sites of Importance for Nature Conservation 2014 found that their quality varied from poor structure and species diversity to species-rich and structurally diverse. Invasive species such as Japanese knotweed exist on a number of sites, for example, the Brent River Park and railway tracksides.

Blue Ribbon Network and Water Quality

- 6.6.10 Brent's existing blue infrastructure or Blue Ribbon Network, includes the Lower River Brent, Grand Union Canal – Paddington Arm ~~and~~ ,Welsh Harp, Wealdstone Brook, Brent Feeder Canal and Dollis Brook and Upper Brent. Water quality is of 'moderate' status in all waterbodies. This is as a result of pollution and physical modification from development, transport and the water industry. The '*Brent River Corridor Improvement Plan*' seeks to ensure that rivers are of a 'good' status to support wildlife. The Grand Union Canal runs through an area of open space deficiency in the borough and is an important route in linking to other open spaces. **MiM204**

Where do we want to be?

- 6.6.11 To support a growing population, high quality and multi-functional green and blue infrastructure networks will be achieved. These will seek to maximise broader economic, environmental, social and sustainable objectives. They will support public well-being and health, sustainable transport, outdoor sports facilities, recreation and tourism use, strengthening resilience and creating conditions suitable for growth. This will be through protecting and, where the opportunities arise, adding to its amount and enhancing green infrastructure quality and accessibility. The council will adopt an approach that seeks to support creation of new sites and habitats that will in time be worthy of designation a recognised status. It will also support improvements those existing sites of recognised nature conservation quality to improve their categorisation.
- 6.6.12 Trees will play an important part of this. New green infrastructure will be created within the Growth Areas. Consistent with London Plan policy G5 Urban Greening all major development will be expected to have a minimum amount of green infrastructure. The targets are challenging. Where feasible, new major developments will create high quality publicly accessible space. These measures will: add to local character and distinctiveness; improve physical and mental wellbeing; contribute towards reducing the impacts of climate change; and attract investment.

LONDON PLAN

Policy G1 Green Infrastructure

Policy G3 Metropolitan Open Land
Policy G4 Open Space
Policy G5 Urban Greening
Policy G6 Biodiversity and Access to Nature
Policy G7 Trees and Woodlands
Policy G8 Food Growing
Policy G9 Geodiversity
Policy SI14 Waterway – Strategic Role
Policy SI16 Waterways – Use and Enjoyment
Policy SI17 Protecting London’s Waterways

Evidence base

Brent Open Space, Sports and Recreation Study 2019^{MiM205}

Brent Indoor Sports Facilities Assessment 2018
Brent Playing Pitches Assessment 2018
Brent Parks and Open Spaces Study 2017
Natural Capital Accounts for Public Open Space in Brent 2017
Brent Biodiversity Action Plan 2007

Other Guidance^{MiM206}

Biodiversity Metric 2.0. DEFRA/ Natural England
Biodiversity net gain. Good Practice Principles for Development. A Practical Guide
CIRIA/CIEEM/IEMA

POLICY BGI1 GREEN AND BLUE INFRASTRUCTURE IN BRENT

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.^{MM119}

For all developments:

- a) open space should meet all of the following criteria:**
 - I. be appropriately designed to be accessible, safe, usable and integrated into the development site;**
 - II. enhance biodiversity and where adjacent to, integrated into existing green and blue infrastructure network; and**
 - III. include a suitable long-term management plan**
- b) adjacent to the Blue Ribbon Network development is required to improve access to the waterway, enhance its setting and provide an appropriate landscaped set-back which may include public open space;**
- c) on or near the Capital Ring (as shown on the Policies Map) development is required to take full account of the need to protect its character, and where appropriate, contribute towards its improvement;**
- d) achieve a net gain in biodiversity and avoid any detrimental impact on the geodiversity of an area;**
- e) in meeting the urban greening factor, place emphasis on solutions that support biodiversity;**
- f) adjacent to green chains development should not undermine its biodiversity and seek to establish a connection to it;**
- g) adjacent to the Blue Ribbon Network and other tributaries, or waterways, or which has the potential to negatively impact on its water quality, development will be required to contribute towards restoration and naturalisation of waterways, and seek to enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive and Thames River Basin Management Plan.**

Justification

- 6.6.13 The borough's urban nature, limited land availability and significant population growth means that the protection and enhancement of existing green and blue infrastructure is of great importance. This will ensure its benefits are maximised for both current and future residents and visitors. The management of development proposals will play an important part in achieving these outcomes.
- 6.6.14 London Plan policy G1 Green Infrastructure sets out key objectives for development and development plans to do this. Nevertheless, in the context of the size of existing provision actions by the council and other parties such as homeowners/occupiers will probably also have more significant influence on outcomes. Taking a comprehensive approach to green infrastructure across its services and actions is therefore important for the council in improving outcomes. Adopting a Green Grid Framework will enable it to ensure that existing blue and green spaces are better connected to communities, and their quality and function are maximised. The Framework will also support the

creation of new open spaces strengthening their links. More details on the Council's Green Grid Network will be set out in the Brent Green Infrastructure Strategy.

- 6.6.15 Brent's existing significant areas of green infrastructure are shown on the policies map. London Plan Policy G3 gives Metropolitan Open Land (MOL), such as Northwick Park and Fryent Country Park, the same level of protection as the Green Belt. Essential ancillary facilities will only be acceptable on MOL where they maintain its openness. The NPPF and London Plan Policy G4 seeks to protect existing open space, sports and recreational buildings and land, including playing fields from development. Exceptions to this are where it can be clearly shown to be surplus to requirements, equivalent local provision is made or the development is for alternative sports and recreational provision the need for which outweighs the loss of the current or former use.
- 6.6.16 As required by London Plan Policy G6, the level of protection afforded to SINC sites should be in proportion to their status and contribution towards the region and/or local ecological networks. Welsh Harp, designated as a nationally recognised Site of Special Scientific Interest is afforded a high level of protection through the Wildlife and Countryside Act. The Brent Sites of Importance and Nature Conservation Study (2014) identifies the biodiversity resources present in these sites. It also makes site specific recommendations to enhance their biodiversity. Development with the potential to impact on a SINC will be expected to have regard to the Study and contribute to delivering its recommendations.
- 6.6.17 Brent's green chains and wildlife corridors are linked to more continuous areas of open space. They allow for the movement of plants and animals/insects and may provide an extension of the habitats they join. For example, the council has supported the planting of urban meadows to form a bee corridor in the borough's greenspace to enhance biodiversity. These types of routes will be protected from development which would impede movement. In exceptional circumstances it may be appropriate to provide an alternative route, providing it can be robustly demonstrated this will continue to support movement.
- 6.6.18 Limited land availability means that existing ratios of green and blue infrastructure space to population cannot be maintained in line with the growing population. London Plan Policy G5 Urban Greening requires a minimum amount of green and blue infrastructure on major development sites. The council will seek the standards as set out in that policy to be met on site. The challenging targets will require its consideration as an integral part of the development, rather than as an after-thought. All development is required to make a positive contribution to biodiversity and contribute to the targets of the Brent and London Biodiversity Action Plan wherever possible. Developments should be designed with an understanding of their wider ecological context. As such the council seeks developers to place a greater emphasis on solutions which have better bio-diversity outcomes where possible when meeting Policy G5 requirements.
- 6.6.19 Barn Hill Open Space, which is located within the boundary of Fryent Country Park has been identified by the London Geodiversity Partnership as being suitable for designation as a Locally Important Geological Site (LIGS). In line with national and regional policy, the council seeks to protect, promote and enhance geodiversity within Brent.

- 6.6.20 The council will place emphasis on designs which reflect and enhance the proposed use of the building or space and the needs of its users, the natural character of the locality and the surrounding buildings and those which best enhance bio-diversity. This will include soft landscaped frontages, boundary treatments and the retention/reinstatement of features of landscape character.
- 6.6.21 In association with this policy and G4 realistic opportunities for additional public open space will be sought wherever possible on major development sites and also in Growth Areas. New provision will particularly be sought within areas identified as being deficient in open space. Where it is agreed that on-site provision is not feasible, the council will seek enhancements to the existing green and blue infrastructure by seeking contributions towards improvements.
- 6.6.22 The council's Food Growing and Allotments Strategy 2012 recommended that opportunities for temporary food growing are pursued. Integration of food growing opportunities into new major residential developments will be sought, taking into consideration the demand for provision within the area. Where it is considered appropriate, the council will encourage the creation of new allotment plots on major development sites. **MiM207**
- 6.6.23 On major sites in particular, which may take some time to develop, or even on smaller sites, a meanwhile green infrastructure use will be encouraged and supported. This could include pocket parks, community gardens or other features that promote community engagement with the developer or integration of the development within the surrounding community.
- 6.6.24 In order to meet open space standards identified in 'Shaping Neighbourhoods: Play and Informal Recreation' Supplementary Planning Guidance, on-site provision will be required. The amount will be consistent with the policy. Where this cannot be achieved, a financial contribution in lieu will be required to ensure suitable provision through new or improved open space elsewhere. The level of contribution sought will be identified and take account of other guidance such as 'Shaping Neighbourhoods: Play and Informal Recreation' Supplementary Planning Guidance. Management and maintenance of new open spaces needs to be considered from the start of the design process. **MiM208**
- 6.6.25 The Open Space, Sport and Recreation Study (2019) sets standards to ensure that reflect that there is adequate open space provision across the borough. It sets open space requirements for each Growth Area. Outside of these, major residential developments within wards which now or through population growth will not achieve minimum standards of open space deficiency provision (i.e. Alperton, Brondesbury Park, Dudden Hill, Harlesden, Kensal Green, Kilburn, Mapesbury, Queens Park, Queensbury, Tokyngton Wembley Central or Willesden Green Ward) should seek to maximise the opportunities on site to create publicly accessible open space with a range of sizes and for a range of users achieve 0.81 sqm of on-site publicly accessible open space per resident. Major residential development in other wards with adequate provision should seek to provide achieve 0.81 sqm of publicly accessible open space provision based on the need generated by the development per resident unless the site is within 400 metres (by the most direct safe walking route to the nearest access point) of an existing publically accessible open space of a

larger typology than can be provided on site, as identified on the policies map.
MiM209

- 6.6.26 In both cases it may be acceptable for the council's residential private amenity standard of 50sqm per home for family housing (3 bedrooms or more) situated at ground floor level and 20 sqm for all other housing ~~20 sqm minimum per dwelling or 50 sqm for a family home (3 bedrooms or more)~~ to be off-set against any proposed on site publicly accessible open space, subject to a minimum of ~~5 sqm~~ London Plan standards of private amenity space being provided for each dwelling. Where on site provision of publicly accessible open space is not feasible, the council will seek S106 contributions for enhancements to the quality of spaces taking account of the recommendations from the qualitative assessment that was carried out by Keep Britain Tidy in 2018. **MiM210**
- 6.6.27 It should not be assumed that the council will automatically adopt the public open spaces provided. Indeed, there may be merit in terms of ensuring high quality maintenance for occupiers of developments to be responsible for their management and upkeep. The incorporation of food growing opportunities on site enhances the likelihood of occupier interest in/ownership of the quality of the space. Any adoption by the council will be subject to its agreement and a suitable commuted sum for on-going maintenance being secured.
- 6.6.28 New or replacement open space provision, should be designed in consultation with the council, and will be expected to address the following:
- a) Location and security – easily accessible by non-car means. Contribute to a sense of security by applying the principles of London Plan Policy D4011 'Safety, security and resilience to emergency'; **MiM211**
 - b) Long-term management plan – to ensure the space will be managed in the long-term to ensure its continuation as a well-used high quality space;
 - c) Layout and design – usable and practical spaces, well suited for a variety of users. Good linkages and permeability will encourage movement and independent play within the site;
 - d) Habitat creation – which assist in achieving Brent Biodiversity Action Plan targets, balancing undistributed habitat zones and areas that people can enjoy and relax in;
 - e) Integration – with proposed and existing green routes including green corridors and the All London Green Grid; and
 - f) Ownership – preferably local community input into the design of the open space to meet needs, promote a sense of ownership, respect, territorial responsibility and community.
- 6.6.29 The council will explore opportunities to improve accessibility to the existing green and blue infrastructure. The focus will be on the creation of new active travel links to and within the borough's open spaces. Opportunities to enhance, and where applicable, expand existing routes, such as the Capital Ring and cycle routes will be pursued. It is anticipated that development will be a key enabler of improving accessibility to the borough's green and blue infrastructure.
- 6.6.30 In developments adjoining the borough's Blue Ribbon Network the council will pursue opportunities to improve public accessibility and its setting, both in relation to buildings and public realm. It should be noted that as a result of the Environmental

Permitting (England and Wales) (Amendment) (No2) Regulations 2016 a permit may be required for certain development adjacent to within 8m of a main river or its tributaries. As such, is required by the Environment Agency to have usually seek a minimum set back of 8m. Where existing set back is greater than 8m the higher distance ideally this should be maintained. This applies to all rivers and specifically to River Brent and Wealdstone Brook. This setback enables ease of general waterway maintenance, helps to create a sense of openness, protecting and offering the opportunity for the enhancement of habitats for wildlife. It also enables opportunity for sustainable and cost effective flood risk management options. Early engagement with the Environment Agency, where applicable, is advised.

- 6.6.30a) The River Brent, which gives the borough its name, formed a natural division between Willesden and Wembley. The name 'Brent' is Old English, from Celtic words meaning 'sacred waters'. The River Brent is formed of a number of tributaries, which join and flow to the borough of Ealing. Despite much of it now being culverted, it is significant to Brent's history and culture. Just as important are the Grand Union Canal and Brent Feeder Canal which are completely artificial watercourses and important as historic transport infrastructure. By 1820 there was not enough water to supply the canal, so under an Act of Parliament in 1819, the Regent's Canal Company decided to dam the River Brent and create a reservoir, an artificial lake, in order to guarantee a sufficient water supply. These water landscapes are recognised as non-designated heritage assets for their historic significance to protect and enhance cultural and heritage value to Brent. Equally, so is the protection, promotion and enhancement of their curtilage, which impact on the setting of these heritage assets. **MiM212**
- 6.6.31 Canal Cottage, Twyford Abbey Road (now in OPDC area) and Reservoir Cottage, in Birchen Grove, are locally listed but much of the twentieth-century development and canal heritage is not protected, and in particular, deserves better recognition. For example, the canal is supported by two aqueducts, one as it passes over the River Brent, the Twyford Aqueduct and the other over the North Circular Road (A406). Other historic features of the canal include a WWII concrete pillbox, bridges and concrete drainage mechanisms. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will also need to balance the protection and enhancement of biodiversity and the multiple needs of the users of canal and towpath. In Brent, development adjacent to the Grand Union Canal in particular provides an opportunity to create new towpaths, public open spaces and access points. Early engagement with the Canal and River Trust for schemes adjoining the Grand Union Canal, Welsh Harp and the Brent Canal Feeder is advised. **MiM213**
- 6.6.32 Notwithstanding the need for development to meet the urban greening factor, areas that currently might not have a designated status might well be rich in biodiversity. On these sites developments should avoid a net loss of biodiversity.
- 6.6.33 Green chains form an important part of the biodiversity network. There are gaps in this network across Brent. Where development is adjacent to a green chain it should ideally link into it to extend the potential for movement of flora and fauna.
- 6.6.34 The Water Framework Directive is a European Union Directive which commits all member states are required to achieve achieving a 'good' status' or 'good ecological; status by 2021, or if an extension is granted, then for all water bodies by 2027. **MiM214**

Currently, all water bodies within Brent are achieving a 'moderate' status. There are a number of reasons as to why these water bodies are not achieving good status. These includes physical modification as a result of urbanisation, effluents and emissions from industry, commerce, homes and roads. This can be due to a number of reasons for example, using drains to dispose off waste, failure of pollution traps, misconnections, blockages and overloading of the sewerage system. In line with London Plan Policy SI5 and Brent Local Plan BSUI4 development should ensure that it is designed to separate and properly connect foul and surface water outfall and where possible remove existing misconnections.

6.6.35 In Brent all waterside developments and other developments which could negatively impact on water quality, **MiM215** such as those where connecting to a combined sewer is unavoidable, will be expected to mitigate impacts by contributing to the delivery of the emerging Thames River Basin Management Plan. The Plan sets out the following measures to enhance the Brent catchment:

- a) Deculverting, removing un-natural structures such as obsolete weirs and banks and bed reinforcements and retaining existing natural watercourse elements.
- b) Bypassing barriers to fish passage, such as weirs improving native aquatic plants and wildlife presence by restoring or creating new and enhanced natural physical and wetland habitats throughout the river corridor.
- c) Control and management, of invasive non-native species.

6.6.36 Such developments should also contribute to the delivery of the Brent River Corridor Improvement Plan, produced by the Brent Catchment Partnership, Brent Biodiversity Action Plan, and the London Rivers Action Plan. Specific projects in Brent catchment are identified on the interactive map on the River Restoration Centre website.

POLICY BGI2 TREES AND WOODLANDS

Development with either existing trees on site or adjoining it that could affect trees will require:

- a) **Submission of a BS5837 or equivalent tree survey detailing all tree(s) that are on, or adjoining the development site;**
- 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. 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.** ^{MM120}
- c) **In the case of minor development which results in the loss of trees provision of appropriate replacements on site.**
- d) **Existing trees on site to be retained or proposed trees to be planted, to accord with the recommendations of BS5837 or equivalent;**
- e) **All agreed works to trees to accord with BS3998:2010.**

Justification

- 6.6.37 Trees and woodlands are vital components of the borough's landscape and green infrastructure with its associated benefits. A tree's growth is within and beyond the human lifecycle, providing a link to the past, present and future. There are a number of veteran trees, which provide niche habitats. Ancient trees and ancient woodlands are afforded special protection by the NPPF. Brent has other valuable trees, which over time may become 'veteran' or 'ancient' and should be protected. The council is undertaking an on-going review of Tree Preservation Orders. It will prioritise new Orders where trees of significant amenity value are potentially under threat.
- 6.6.38 Consistent with London Plan Policy G7 Trees and Woodlands the council strongly encourages the retention of trees on development sites. If trees are located on or adjacent to a site, applicants should carry out a Tree Survey. The survey will need to accord to the standards set out in BS 5837 Trees in relation to construction – Recommendations. It should inform the design and layout of the development to ensure the long term retention of as many existing high and moderate quality trees as possible and should accord with the hierarchy of Avoid-Mitigate-Compensate. Where it is agreed with the council that the retention of trees is not possible, re-provision should be made on site of equivalent canopy cover. Where agreed to not be feasible, a contribution to off-site tree planting for equivalent canopy cover will be required. Total canopy area of existing trees proposed to be removed will be measured from the tree survey. Developers should make proposals for new trees which, at time of planting, provide an equivalent canopy area to those removed. Taking account of the right species, wildlife value, planting location, availability of space, aftercare and growing conditions. This will need to be evidenced in the ecology assessment. **MiM216**
- 6.6.39 The London Plan encourages the 'Right Tree for a Changing Climate' approach. This seeks to ensure that newly planted trees will thrive in the changing climate and assist in coping with the predicted warmer temperatures and the change in weather patterns. Trees should be designed into a development scheme from the outset. They should complement the surrounding local landscape. They need sufficient space to enable them to reach their mature height and spread without causing issues to the integrity of the built structure and its future occupants. BS 8545:2014 *Trees: from nursery to independence in the landscape – recommendations* should be used when choosing landscaping and devising management plans for trees within developments. **MiM217** The council encourages early engagement to agree the most appropriate species are used for the scheme.
- 6.6.40 The London Plan and the Mayor's Environment Strategy recognise the value that trees bring to the environment and seek to increase tree cover by 10% by 2050. To support this target, the council will encourage planting of more diverse species on development sites and elsewhere. This will mitigate the risks that relying on a restricted range of species or monoculture and climate change present. Further, the council will prioritise growth areas, AQMAs, areas of open space deficiency and schools across the borough for tree planting through an integrated strategic approach informed by a feasibility study.

- 6.6.41 The Mayor's Greener City Fund continues to plant trees within the borough and the council will continue to support Community Tree Planting Grants through NCIL and S106.
- 6.6.42 Wherever possible, opportunities to increase the borough's tree population will be taken. Gladstone, Barham and Roundwood Parks are of an open and spacious nature. Together with other large open spaces and generous highway verges they provide opportunities for the planting of large canopy species, adding to character. The council will ensure that the planting at such sites will not be at the expense or loss of other habitats and that new planting works with the existing landscape scheme that is in place. Street tree planting for the most part will focus on smaller trees, consistent with the right tree right place philosophy. This will limit the council's on-going tree management and public realm maintenance costs.
- 6.6.43 ~~The council does not yet have full knowledge of the existing tree stock, and its quantified environmental and economic benefits. Developing a database such as i-tree Eco will provide a base line and enable setting future targets and a focus on tree deficient areas.~~ The council has recently developed an existing tree stock database informed by the i-tree Eco survey to quantify the borough's existing tree stock's environmental and economic benefits. **MiM218**
- 6.6.44 The appropriate management of trees can prolong their lifespan, support their successful establishment and maximise their ecosystem benefits. BS 3998:2010 *Tree Work - Recommendations* should be used for established trees. For newly planted trees on the site, the council will require a management plan which details how they will become an established component of the landscape and refer to BS 8545 *Trees: from nursery to independence in the landscape - Recommendations*.
- 6.6.45 As well as trees, mixed species of mature shrubs and hedges that make a significant contribution to the streetscape should be kept. This will require appropriate space and conditions to allow their long term health to be maintained. Detailed specification for new planting, promoting native species, and including like for like or a higher quality of replacements trees will be sought in support of applications.

6 Themes

6.7 Sustainable Infrastructure

Where we are now:

- 6.7.1 The majority of schemes which come forward within Brent adhere to the Draft new London Plan and Brent Council sustainability policies. There are schemes that do not meet the sustainability criteria, largely the office to residential conversions allowed through permitted development rights.
- 6.7.2 A private site-wide Combined Heat and Power (CHP) network has been installed in the Wembley Park area. A number of major developments within the Growth Area have also been designed to allow future connection to a district heating network should one become available. Plans for a sustainable energy network within the South Kilburn Growth Area have been forwarded through the review of the South Kilburn masterplan in 2016.
- 6.7.3 On average, major development within Brent has achieved a 31% reduction in CO₂ emission on Part L 2006 in 2016/17 and a 36% reduction in 2015/16. The preferred method of providing renewable energy on-site within Brent is through solar photovoltaics (PV). This type of renewable energy technology was found in 38% of all major development in 2016/17 and 67% in 2015/16.
- 6.7.4 The majority of Brent is within an Air Quality Management Area (AQMA). Brent meets all national air quality targets except for two pollutants – Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). There are currently four Air Quality Focus Areas (AQFA) in Brent. These are: Neasden Town Centre; Church End; Kilburn Regeneration Area; and parts of Wembley Central and Tokyngton. The largest contributors to poor air quality are road transport, local energy generation and construction. The impacts can also be made worse by wider issues such as poverty, deprivation and general poor health. At least 200 premature deaths and a further unquantified amount are attributable to poor air quality within Brent.
- 6.7.5 Flooding can have major economic and social impacts on the borough's residents, as well as devastating environmental impacts. Brent is susceptible to flooding from different sources. Fortunately, over the last twenty years Brent has not experienced major flooding from its brooks and rivers, with the most recent events (2007 and 2010) occurring on the highway, open spaces and gardens. The Policies Map shows areas of the borough that are subject to fluvial and surface water flooding. ^{MiM219}
- 6.7.6 The majority of the borough is at low risk to fluvial flooding. Areas of Flood Zone 2 (>0.1% and < 1% annual flooding exceedance) and Flood Zone 3 (Fluvial and Tidal) (>1% annual flooding exceedance) generally follow the course of the River Brent and its tributaries. Approximately 1,390 properties are potentially at risk of fluvial flooding at least once every 100 years, and 2,000 once every 1,000 years. There are a number of areas within the borough which are at risk to surface water flooding (Flood Zone 3). This occurs as a result of high intensity rainfall, resulting in water ponding or flowing over ground before it enters the underground drainage network or a watercourse. The areas of flood risk tend to be located within the highway. In a much more extreme event (1 in 200 probability occurrence in any given year) approximately 35,500 residential properties and 4,400 non-residential properties could be at risk of surface flooding of greater than 10cm depth.

- 6.7.7 Climate change is one of the key factors which could see an increase in the risk of flooding within Brent. The extent of flooding and its impacts will vary depending on the climate change scenario. Maps showing the varying extents are included within the [Joint West London Strategic Flood Risk Assessment SFRA](#). Brent has 27 critical drainage areas, a number of which cross into other boroughs. Instances of sewer flooding are generally higher in the north of the borough than in the south, with Kenton ward (81 incidences over last 5 years), Northwick Park and the south part of Kilburn ward (both over 41 incidences) being hot spots.
- 6.7.8 Unsurprisingly the increased potential for elevated groundwater within areas follows those adjacent to the course of waterways. Artificial potential sources of flooding include Brent Reservoir, owned and managed by the Canals & Rivers Trust. In the extremely unlikely event of the reservoir failing and releasing its water, impacts would be greatest on properties to the south and west.

Insert sustainable infrastructure infographic

Where we want to be:

- 6.7.9 The Council made its “climate and ecological emergency” declaration in July 2019, promising to aim for carbon neutrality by 2030. It will be delivering a new climate strategy in 2020, which will provide greater clarity on the actions that will be taken in Brent to address climate change. In terms of clean generation, carbon reduction/energy efficiency and construction emissions, the council will aim to ensure all major developments accord with the London Plan’s policy objectives meeting renewable energy standards on site. There will be the wider delivery of established district wide CHP systems within the Wembley and South Kilburn Growth Areas. In addition, new district heating networks will be sought within the remaining Growth Areas. **MiM220**
- 6.7.10 There is a significant role for Green Infrastructure to be multi-functional. It can improve physical and mental health, increase biodiversity, provide recreation, assisting in supporting environmental resilience and addressing the impacts of climate change. The council wants to see improved air quality through a number of measures, with particular emphasis on reducing pollution in focus areas, identified pollution hot spots and around schools. The council will aim for all development within identified Growth Areas to be ‘Air Quality Positive’. In addition, the development of a high quality green infrastructure network within areas subject to high exposure of poor air quality will be taken forward.
- 6.7.11 With regards to flooding, the council will work strategically across catchments with neighbouring boroughs. All major developments are likely to contribute to reducing local flood risk by limiting rainfall run-off to greenfield rates and be outside the floodplain or if this is not possible, incorporating flood resilience to protect the occupiers and property. The council will work with the Environment Agency to deliver the Tokyngton Park flood alleviation scheme.
- 6.7.12 Details about flood alleviation schemes, and the delivery of large-scale sustainable infrastructure within the borough is detailed within the council’s Infrastructure Delivery Plan.

POLICY BSUI1 - CREATING A RESILIENT AND EFFICIENT BRENT

The council will require establishment of district heating networks within the new Neasden Stations, Northwick Park and Staples Corner Growth Areas. All other Growth Areas will be expected to develop district heat networks, however the scale and type of network will vary depending on the location and scope of the projects.

All major developments shall connect to or contribute towards a decentralised energy system unless it can be demonstrated that such provision is not feasible or the proposed heating system is 100% renewable.

All major developments will be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used to enable the development to mitigate and adapt to climate change over its intended lifetime.

All major non-residential development to achieve a BREEAM standard of 'Excellent'.

LONDON PLAN

Policy SI2 Minimising greenhouse gas emissions

Policy SI3 Energy Infrastructure

Policy SI4 Managing heat risk

Policy SI5 Water Infrastructure

Sustainable Design and Construction SPG

Justification

6.7.13 It is anticipated that without implementing mitigation and adaptation measures, climate change will have a significant impact on Brent. Impacts include increased storms both in frequency and intensity, greater temperature variation (i.e. colder in winter, hotter in summer) and increased risk of flooding. Creating a resilient and efficient Brent, will not only tackle climate change within the borough, but also improve air quality and bring a number of economic and social benefits. Ensuring that all developments have high standards of environmental performance will be a key part in delivering this objective. The London Plan and associated guidance provides a strong and challenging policy context in order to meet these objectives. As such, Brent focuses its policies on more specific local requirements to support them.

Sustainable Design and Construction

6.7.14 The Mayor's Sustainable Design and Construction SPG provides detailed guidance on how to achieve environmental sustainability policy objectives in the London Plan effectively. The council acknowledges that minor developments will have limited opportunities to incorporate sustainability measures, however they should seek to reduce potential overheating and reliance on air conditioning system through good design.

6.7.15 All major development proposals are to be accompanied by a Sustainability Statement demonstrating at the design stage, how sustainable design and construction measures will mitigate and adapt to climate change over the intended lifetime of a development. The statement must demonstrate the scheme has incorporated the advice set out in the Mayor's Sustainable Design and Construction

SPG, and any subsequent guidance, and meets the requirements of London Plan policy. Information on the sustainable design and construction measures included within minor development should be included within the Design and Access Statement.

- 6.7.16 For major non-residential development a Design Stage BRE Interim certificate of compliance and a Post Construction Certificate will be required to demonstrate achievement of a BREEAM rating of Excellent.

Water Efficiency

- 6.7.17 London is in an area of high water stress, with demand for water forecasted to increase as a result of the growth in population and economy. Therefore, it is essential that development within Brent should seek to increase water efficiency and ensure the security of water supply. For residential development, a Water Efficiency Assessment will be required providing evidence the development will meet the target of 105 litres or less per head per day, excluding an allowance of 5 litres or less per head per day for external water use.
- 6.7.18 For sewage collected from northern parts of Brent there is the potential for wastewater treatment infrastructure to be nearing capacity towards the end of the Plan period. Developers of major schemes should seek a coordinated water management approach with Affinity and Thames Water to ensure sufficient water supply and wastewater infrastructure capacity at an early stage to establish a sustainable approach, efficiency and effective mitigation of impacts. Consideration should be given to the use of water recycling measures, in particular grey water recycling to reduce the impact the development will have on wastewater treatment infrastructure. The council will take into account advice from Thames Water in relation to water generated from developments in particular and where necessary will use appropriate conditions to ensure that development does not create risk of adverse environmental impacts caused by potential sewage outfall on watercourses.

Energy Efficiency

- 6.7.19 Improving energy efficiency within the borough is key if Brent is to be zero-carbon by 2050 as required in the London Plan. Greater energy efficiency will bring a number of environmental benefits, but will also deliver positive social impacts such as helping to tackle fuel poverty, and improving the health and wellbeing of the borough's residents.
- 6.7.20 Policy SI2 of the London Plan requires major developments to be net zero-carbon, which is to be achieved through minimising carbon emissions in accordance with the energy hierarchy: Be Lean, Be Clean, ~~and~~ Be Green and Be Seen. The carbon reduction targets should be met on-site. Only where it is clearly demonstrated carbon reduction targets cannot be fully met on site, any shortfall may be off-set through local carbon offsetting. **MiM221**
- 6.7.21 To help achieve the zero-carbon target, a change in how energy is supplied and used within developments is required. The council actively promotes decentralised energy systems, acknowledging the important role they could play in the borough's future energy supply. The Wembley Growth Area has an established decentralised energy system, with new major developments within this area expected to connect or contribute to the system. The Gloucester and Durham development at South Kilburn

will provide the infrastructure to support delivery of a district network in that area. The council will seek to establish new sustainable energy networks within new Growth Areas identified within this plan. Innovative solutions are encouraged. Existing features such as the Grand Union Canal for example, provide the opportunity for heating and cooling of buildings. The council will maintain a record of constructed/approved developments which have been designed to allow connection to a network.

- 6.7.22 The incorporation of on-site renewable energy generation makes a valuable contribution to the reduction of a site's carbon emissions. The council will strongly encourage the use of solar technology, and other innovative technological solutions, in major developments that will help reduce carbon emissions. Minor developments will be encouraged to maximise feasible opportunities for on-site renewable energy generation.
- 6.7.23 While sustainability standards are rising for new build developments, improvements to the energy efficiency of Brent's existing building stock will be necessary to achieve carbon reduction targets.
- 6.7.24 An Energy Assessment will be required to demonstrate that major developments will be constructed to achieve energy targets in accordance with London Plan energy hierarchy. Energy Assessments are to be prepared in accordance with the latest GLA guidance. An Energy Assessment Review will be required no later than two months after completion confirming whether the development achieved the energy targets. Only if the feasibility study in the Energy Assessment demonstrates that all on-site options have been considered and are not feasible, will carbon offsetting be considered.
- 6.7.25 In accordance with London Plan Policy SI2, where it is demonstrated that the zero-carbon target cannot be achieved developers should actively seek to deliver their remaining carbon savings through local carbon saving projects. Currently, the council will use the standard London recognised price or that such as that set by the Zero Carbon Hub, and seek payment into a local fund which will be used to deliver carbon offsetting in the borough. Carbon offsetting schemes proposed by developers should accord to the Council's Carbon Offsetting Spending Policy.

POLICY BSUI2 AIR QUALITY

Major developments within Growth Areas and Air Quality Focus Areas will be required to be Air Quality Positive and elsewhere Air Quality Neutral. Where on site delivery of these standards cannot be met, off-site mitigation measures will be required.

LONDON PLAN

Policy SI1 – Improving Air Quality

London Environment Strategy

Sustainable Design and Construction SPG

Justification

- 6.7.26 Poor air quality is a prominent issue within Brent. A range of studies have shown that it can result in a range of short-term and long-term health impacts. These include the exacerbation of asthma, negative impacts on lung functionality and Chronic Obstructive Pulmonary Disease.

- 6.7.27 A range of interventions will be needed throughout the Plan period to address poor air quality within Brent. Air pollution is also a shared problem, so partnerships with other Local Authorities, the London Mayor and other relevant stakeholders will be developed to maximise resources and realise wider air quality benefits.
- 6.7.28 London Plan Policy SI1 states that London's air quality should be significantly improved and exposure to poor air quality, especially for the vulnerable, should be reduced. It also places a requirement on all development to be air quality neutral, unless it is the development of large-scale redevelopment areas or is large enough to be subject to an Environmental Impact Assessment where an air quality positive approach should be aimed for.
- 6.7.29 Brent's Air Quality Action Plan identified Nitrogen Dioxide and Particulate Matter as the pollutants of most concern in the borough. An Air Quality Management Area (AQMA) covering areas of the borough where EU limit values are not, or are unlikely to be met has been declared. AQMAs are shown on the Policies Map.
- 6.7.30 The high concentration of vehicle movements along the North Circular and other major thoroughfares means that these areas have some of the highest concentrations of pollutants within the borough. As a result of this, targeted action will be needed along the borough's strategic road corridors.
- 6.7.31 For major development to be 'air quality neutral' it must meet the building emissions benchmarks set out in the Mayor's Sustainable Design and Construction SPG. For developments to be 'air quality positive' they do not only have to be net zero carbon, but also contribute actively to a progressive reduction in emissions. The Mayor is developing guidance about the most effective approach to ensure a development is air quality positive.
- 6.7.32 Proposals should demonstrate how air quality targets will be met, and where applicable, exceeded through an Air Quality Impact Assessment. This is to be produced in accordance with guidance in the Mayor's SPG. Where an Air Quality Impact Assessment cannot be made at the application stage, for example if the final technology decisions have not been made, it will be required by condition.
- 6.7.33 An Air Quality Impact Assessment by a suitably qualified person, is required for all major developments and installations of CHPs/large communal boilers. The assessment will address baseline local air quality; whether the proposed development could significantly change air quality during the construction and operational phases; and/or whether there is likely to be a significant increase in the number of people exposed to poor air quality. It will also include mitigation measures proposed to create an acceptable development. Mitigation measures will be site specific but could include for example urban greening or promoting the use of sustainable modes of transport. Post-completion stack emission monitoring may be required, to demonstrate that any approved energy plant meets the emission standards specified in the Impact Assessment.

LONDON PLAN

Policy SI12 – Flood risk management

POLICY BSUI3 MANAGING FLOOD RISK

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:

- a) **minimise the risk of flooding on site and not increase the risk of flooding elsewhere;**
- b) **wherever possible, reduce flood risk overall;**
- c) **ensure a dry means of escape;**
- d) **achieve appropriate finished floor levels which should be at least 300mm above the modelled 1 in 100 year plus climate change flood level; and**
- e) **not create new basement dwellings in areas of high flood risk.**

Proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

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. ^{MM121}

Justification

6.7.34 Consistent with national and London Plan policy, development in Brent will not be allowed that unacceptably increases the risk of flooding. Development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical guidance on flood risk over the lifetime of the development. The West London SFRA provides more detail of the requirements for Flood Risk Assessments (FRAs) undertaken to support development proposals in Brent. In accordance with national policy the sequential test will be applied to ensure development is steered to areas with the lowest probability of flooding. Where suitable sites of lower flood risk are not available, the Exceptions Test is a method to demonstrate and help ensure flood risk to people and property will be managed satisfactorily. ^{MiM222}

6.7.35 Developments which are required to pass the Exceptions Test will need to address flood resilient design and emergency planning in accordance with London Plan policy. This has to take account of the latest climate change allowance as identified by the Environment Agency, but take a precautionary approach to reducing long term risk based on the fact that such allowances are subject to periodic review.

6.7.35a) 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.

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. 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. **MM122**

6.7.36 Zone 3 flood zones for fluvial and surface water are shown on the Policies Map. Flood risk zones are shown on maps produced by the Environment Agency, available on their website and updated annually. For ease of use any such changes will also be made to the interactive West London SFRA maps as well as the Policies Map.

Information in support of planning applications

6.7.37 The following development proposals should be accompanied by a FRA to consider all forms of flooding:

- a) in flood zone 2 or 3 including minor development and change of use;
- b) more than 1 hectare (ha) in flood zone 1;
- c) less than 1 ha in flood zone 1, including a change of use in development type to a more vulnerable class (for example from commercial to residential), where they could be affected by sources of flooding other than rivers; and
- d) in an area within flood zone 1 which has critical drainage problems.

6.7.38 The West London SFRA sets out a check list for sustainable flood risk mitigation measures and level of detail to be included in site-based FRAs dependant on the flood zone to demonstrate how the development seeks to reduce flood risk. For development within Zone 3 for surface water, the applicant will be expected to have undertaken dialogue with the council's Lead Local Flood Authority representative prior to submission of an application.

LONDON PLAN

Policy SI5 Water Infrastructure

Policy SI13 Sustainable drainage

OTHER

The SuDS Manual 2015 CIRIA

Designing Rain Gardens: A Practical Guide. 2018 Urban Design for London

POLICY BSUI4 ON SITE WATER MANAGEMENT AND SURFACE WATER ATTENUATION

Substantial weight will be afforded to the target for mains water consumption of 105 litres or less per person per day and to the achievement of greenfield runoff rates for surface water. Where greenfield run-off rates cannot be achieved this should be clearly justified by the applicant.

Major development proposals or minor developments and changes of use which would impact on the current drainage regime must be accompanied by a drainage strategy.

The design and layout of major development proposals will be required to:

- a) use appropriate sustainable drainage measures to control the rate and volume of surface water run-off;**
- b) ensure where feasible separation of surface and foul water systems;**
- c) make reasonable provision for the safe storage and passage of flood water in excessive events; and**
- d) demonstrate adequate arrangements for the management and maintenance of the measures used.**

Proposals for minor developments, householder development, and conversions should make use of sustainable drainage measures wherever feasible and must ensure separation of surface and foul water systems.

Proposals that would fail to make adequate provision for the control and reduction of surface water run-off will be refused.

Justification

6.7.39 The Draft new London Plan policy S15 addresses the pressure on London's water supply related to existing scarcity which will be exacerbated by climate change and population growth. Similar to most of London, Brent also has combined sewer networks which do not have the capacity to deal with extreme events, consequently causing pollution to water courses. As such and consistent with London Plan policy it is necessary to ensure that water use is limited to protect supply, but also reduce potential for pollution. The 105 litres target is consistent with Part G2 of the optional requirement of the 2010 Building Regulations which specifies maximum consumption values for water fittings. Brent gives significant weight to this element of London Plan policy. Conditions will be applied to planning permissions to ensure the delivery of this element of the building regulations.

6.7.40 It is a national requirement for all major development and all developments in areas of flood risk to utilise sustainable drainage systems (SuDS), unless demonstrated to be inappropriate. London Plan policy S113 states development should aim to achieve greenfield run-off rates and ensure that surface water is managed as close to its source as possible in accordance with the drainage hierarchy. Such solutions should be an integrated element of the site's green infrastructure to meet London Plan policy G5 Urban Greening requirements. The council will assess applications involving SuDS in its role as Lead Local Flood Authority. It has a preference for natural SuDs such as rain gardens, swales and storage ponds than piped and mechanical solutions.

- 6.7.41 A Drainage Strategy will be required for all major developments and also for minor developments and change of use proposals which will impact on the current drainage regime. This must demonstrate how surface water could affect a site and the surrounding areas. Detail will need to be provided on how water is expected to behave on site, determine the site's SuDS infiltration potential, runoff rates, and flow pathways, both before and after the proposed development is in place.
- 6.7.42 A SuDS and drainage strategy maintenance plan will also be required. The developer is to provide Water Quality and Biodiversity Statements and cost benefit analysis for conventional and SuDS systems. It must also be demonstrated SuDS have been designed in a way which contributes to the delivery of Brent's Surface Water Management Plan and other policy. A Drainage Strategy Submission checklist is provided within the West London SFRA.

6 Themes

6.8 Transport

Where we are?

- 6.8.1 Overall Brent has generally good public transport links. It is the joint top borough for the number of rail and underground stations in London. It is served by the Jubilee, Metropolitan, Bakerloo and Piccadilly lines and the London Overground. In addition, the Chiltern Line rail service runs between Marylebone and South Buckinghamshire via Wembley Stadium station, and the Southern and London Northwestern rail services run between South London and Milton Keynes and Euston and West Hertfordshire respectively via Wembley Central station. It has many bus routes serving town centres within and outside the borough. Whilst the underground and overground provide good radial links to Central London, orbital links are served by overground and the bus network which tends to be less reliable due to road congestion. Road congestion is experienced in parts of the borough during peak times and is a major contributor to poor air quality. Areas of particular pressure include the North Circular which intersects the borough, and the road network around Wembley on events days. An Ultra-Low Emission Zone (ULEZ) is being taken forward by the Mayor, in which vehicles must meet new, tighter emission standards or pay a daily charge to travel within the area. From October 2021 the ULEZ will expand to include parts of Brent up to the North Circular.
- 6.8.2 Brent also has a number of industrial estates that both rely on and generate freight movements. Freight, deliveries and construction traffic have a significant impact on the network in terms of congestion, road safety and air quality.
- 6.8.3 There are two radial cycle routes in the borough and one orbital route forming part of the 900km London Cycle Network Plus, and there are some quietways in parts of the borough. The Brent section of the Gladstone Park to Regent's Park cycleway is now complete. However, cycling take up is still relatively low and varies across the borough. In the south of the borough cycling claims 2-5% modal share of journeys, whereas in the north this falls to 0-1%. One of London's metropolitan walking routes passes through Brent. The Capital Ring, a 78 mile walking route which encircles London, connects Northwick Park and South Kenton to Welsh Harp. The Paddington Arm of the Grand Union Canal is a pedestrian and cycle route connecting Alperton to Greenford to the west and Park Royal and Old Oak to the east. Pedestrian mode share accounted for 27% of all trips in 2013/14-2015/16. Quality of public realm and safety have been cited as barriers both to walking and cycling.

Where do we want to be?

- 6.8.4 The Mayor's Transport Strategy (2018) has a target that by 2041 80% of all journeys will be undertaken by walking, cycling and public transport. Currently 41% of journeys in the borough are by private vehicle. To reduce this to 20% will require a

significant change in behaviour. The council is committed to working towards this target and the Brent Long Term Transport Strategy 2015-35, identifies how we will promote sustainable travel and active travel (public transport, walking and cycling) over the use of private vehicles. The Brent Local Implementation Plan is updated on a rolling basis. It sets out the transport schemes that will be invested in to achieve the objectives of the Transport Strategy.

- 6.8.5 Sustainable and active travel is not only necessary for the road network to cope with demand, but there are clear health benefits in promoting physical activity and reducing air pollution from vehicles. To make active travel the preferred choice for shorter journeys the quality and coverage of walking and cycling routes in the borough will need to be improved. New walking routes will be designed to healthy streets standards (see Figure 36), taking account of the needs of all users including older people and disability groups. Brent's cycle network will be extended to include new cycleways. Future cycle routes include Wembley Central to Willesden Junction and Wembley Park to Harrow Weald and the Grand Union Canal cycleway which is being extended from Alperton to the west towards Hayes, and subject to funding to the east towards Park Royal and Old Oak.

Figure 36 Healthy Streets Standards

Source: GLA

- 6.8.6 The council will work closely with its partners including TfL, the West London Alliance and WestTrans to improve public transport access for all across Brent. A key priority is to improve orbital links from east to west through the West London Orbital (WLO) rail link. The link would use the existing Dudding Hill freight line to create an overground passenger line connecting Hounslow in the west to Hendon and West Hampstead in the east via Old Oak Common (~~Cross-rail~~ Elizabeth Line, Great Western Mainline and High Speed 2 stations), Harlesden, Church End, Neasden and Brent Cross West (Thameslink station). It will also be important that strong pedestrian links are created from surrounding stations into the borough. A pedestrian route over the A5 is needed to connect Brent Cross West station to Staples Corner. The precise location of the WLO stations will be firmed up as the project progresses. When there is more certainty on their location more detailed work can be done on improving their connectivity to surrounding areas.^{MiM223} To the south the regeneration of Old Oak, being led by the Old Oak and Park Royal Development Corporation, is a key opportunity to improve connections from Harlesden to Old Oak and secure a much needed upgrade to Willesden Junction station. In addition, the council will continue to work with bus operators to improve coverage to key destinations and interchange facilities. It will be important that public transport is accessible to all, with step free access to overground and underground stations a key priority. Step free access will be introduced at Brondesbury Park and Queen's Park Stations and feasibility work is being undertaken for Northwick Park.

Figure 37 Proposed West London Orbital Route

Source: Mayor's Transport Strategy, GLA

6.8.7 Developers will also be key to achieving this ambition by ensuring new developments, through their design and use of technology, make active travel the preferred choice for users. Major developments and Growth Areas will need to connect and contribute to cycling and walking routes; be located in areas with good public transport access; be car-free or car-lite; help to increase coverage of Electric Vehicle charging points; enable broadband access to encourage home working and assist independent living.

LONDON PLAN

London Plan T2 Healthy Streets

London Plan T5 Cycling

London Plan Pedestrian Comfort Guidance for London, TfL

London Cycle Design Standards, TfL

West London Cycle Parking Design Guide, WestTrans

EVIDENCE BASE

Mayor's Transport Strategy

Brent Local Implementation Plan

Brent Long Term Transport Strategy

Brent Cycle Strategy

Brent Walking Strategy

Brent's Parking Standards

Heavily Parked Streets

POLICY BT1 SUSTAINABLE TRAVEL CHOICE

The council will prioritise active and sustainable travel over private motor vehicles. The council, will work with its partners and, where appropriate, require developments to:

Active Travel

- a) design public realm to meet healthy streets principles and provide access for all; publicly accessible private space will be managed in accordance with the Mayor's Public London Charter or locally adopted equivalent standard;**
- b) protect the character of the Capital Ring walking route and, where appropriate, contribute to its improvement;**
- 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;**

- d) enhance the A5 corridor to reduce traffic dominance and improve the public realm;
- e) improve environmental quality and reduce severance along the North Circular and London Distributor Road Network;
- f) remove vehicle cross-overs or other public realm features no longer required;

Sustainable Travel

- g) safeguard land for and enable the delivery of the West London Orbital overground;
- h) create a high quality pedestrian connection from Brent Cross West Thameslink station to Staples Corner and the wider area in parallel with the delivery of the station;
- i) create a high quality pedestrian and cycle connection between Harlesden and an upgraded Willesden Junction station;
- j) increase the number of tube and overground stations with step free access in the borough;

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;

Clean Technology ^{MM123}

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

Justification

6.8.8 Promoting active and sustainable travel has recognised health benefits. Private vehicles are a major contributor to poor air quality in the borough. Prioritising private vehicle use would have negative environmental impacts in terms of air and noise pollution. Active travel has recognised benefits for physical and mental health. Government guidance¹ recommends children aged 5 to 18 need 60 minutes of moderate intensity activity each day, whilst adults are recommended 150 minutes each week. Promoting walking and cycling will help ensure people get the level of activity they need to stay healthy.

6.8.9 Safety and quality of public realm have been cited as two key barriers to walking and cycling. To address this walking routes should be designed to healthy streets standard. New cycling routes will be delivered in accordance with the most up to date Brent Cycling Strategy. Routes are shown in Figure 38.

Figure 38 Existing and Proposed Cycling Routes

¹ UK physical activity guidelines, www.gov.uk, 2011

Source: Brent Cycle Strategy

- 6.8.10 New development can render some existing public realm features redundant and they can adversely impact on the quality of the walking environment. This includes features such as vehicle cross-overs which can perpetuate uneven surfaces or encourage obstruction of the footway by vehicles. Where such redundant features occur, these should be removed and the public realm made good by the development.
- 6.8.11 An improved public transport network is also needed for longer journeys. The WLO is an opportunity to make use of an existing freight line to improve orbital travel in Brent. Subject to feasibility the council is seeking stations initially at Harlesden and Neasden with interchanges to the existing transport network. The strategic outline business case was published by TfL in June 2019. The council will continue to work closely with TfL and boroughs forming the West London Alliance to facilitate the delivery of the WLO. Other than the WLO there are limited opportunities to further extend the underground and overground network in the borough. It is important that improved connections are created from within the borough to proposed stations on its boundary including Brent Cross West Thameslink Station and HS2 and Elizabeth Line stations at Old Oak. To the north of the borough the priority will be to enhance the coverage and frequency of the bus network.
- 6.8.12 The North Circular Road is part of the TfL Road Network and the A5 is a London Distributor Road. Both experience high volumes of traffic and at times congestion, which impacts on the quality of the environment in the surrounding area and operation of businesses. Environmental improvements and opportunities to reduce severance, for example by enhancements to underpasses and crossing points, will be sought. Brent Council will work with the London Boroughs of Barnet and Camden to deliver improvements along the A5, including improved public realm and increased tree planting. Intelligent signing could help manage traffic flow along the North Circular.

Transport Implications of New Development

- 6.8.13 London Plan Policy T4 sets out the need for developments to appropriately address impacts on the movement network. It also identifies the need for transport assessments and associated travel plans to be submitted in association with major developments. This will therefore be a requirement for all major developments when planning applications are submitted.
- 6.8.14 Where significant impacts arise including during development construction, mitigation measures should be proposed and the residual impacts assessed. This includes mitigation on smalls^{MiM224} scale schemes where issues are not caused by levels of generated traffic, but by poor design. Planning obligations may be sought to fund mitigation measures to make development acceptable or conditions may be imposed on a planning permission to restrict impacts.

6.8.15 The range of mitigation for which planning obligations may be sought includes, but is not restricted to, the following. These have been selected as examples as they either encourage use of sustainable modes or manage those trips which need to be made by car on the highway network:

- a) Travel Plans.
- b) Public transport improvements sufficient to service the scheme or to integrate it with the surrounding area. Developments attracting a significant number of trips in areas with low or moderate public transport accessibility or causing capacity issues to the existing network will only be acceptable when significant public transport improvements are secured which are both viable and justifiable in the longer term.
- c) The extension or bringing forward of on-street parking controls or waiting restrictions due to an unacceptable impact on road safety, emergency vehicle access or traffic management.
- d) Improvements to pedestrian and/or cycle facilities.
- e) Traffic calming measures.
- f) Acceptable road safety and essential highway improvements, not necessarily restricted to the immediate development area.
- g) Programmes to reduce car usage and ownership (car pooling, car clubs, cycle sharing schemes).

LONDON PLAN

Policy T4: Assessing and mitigating transport impacts
Transport Assessment Best Practice Guidance, TFL
Travel Plan Guidance, TFL

POLICY BT2 PARKING AND CAR FREE DEVELOPMENT

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. ^{MM124}

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.

MANAGING THE IMPACT OF PARKING

Additional parking provision should not have negative impacts on existing parking, highways, other forms of movement or the environment. The removal of surplus parking spaces will be encouraged. Development will be supported where it does not:

- a) add to on-street parking demand where on-street parking spaces cannot meet existing demand such as on heavily parked streets, or otherwise harm existing on street parking conditions;
- b) require detrimental amendment to existing or proposed CPZs. In areas with CPZs access to on-street parking permits for future development occupiers other than for disabled blue badge holders will be removed or limited;
- c) create a shortfall of public car parking, operational business parking or residents' parking;

The council will require off-street parking to:

- d) preserve any means of enclosure, trees or other features of a forecourt or garden that make a significant contribution to the building's setting and character of the surrounding area; and
- e) provide adequate soft landscaping (in the case of front gardens 50% coverage), permeable surfaces, boundary treatment and other treatments to offset adverse visual impacts and increases in surface water run-off.

Public off-street parking will be permitted only where it is supported by a transport assessment and is shown to meet a need that cannot be met by public transport.

The council will accept the loss of off street short-term publicly available parking only where this would not lead to under-provision in the locality.

Justification

Car and Cycle Parking and Car Free Development

6.8.16 London Plan policies T6 – T6.5 address parking and provide associated parking standards. For uses not covered by London Plan policy, local standards are set out in Appendix 4. The requirements for electric charging points and cycle parking are set out in London Plan policies T5 and T6-T6.1.^{MiM225} A proportion of electrical charging points should be publicly accessible to all road users at all times to encourage greater use.

6.8.17 The amount of parking provided in accordance with parking standards is a balance between a number of factors. These include seeking to reduce unnecessary car trips, promoting effective use of land, urban design and environmental quality, making development viable and not creating on street parking pressure which undermines quality of life. The standards promote fewer spaces in locations better served by public transport. The emphasis is on ~~not trying to~~ only providing spaces where they are unnecessary. The starting point should always be a 'car-free' development.^{MiM226} Opportunities for car free development might include locations close to public transport interchanges where space for parking is constrained. Other areas that are easily accessible by public transport may also be suitable for car free development, subject to a CPZ being in place or implemented. Where development is car free, or

there is a limit on the number of occupiers able to park on-street, legal agreements or conditions will be used to ensure that future occupants are aware they may not be entitled to on-street parking permits. Reductions in parking provision can also be delivered through car clubs and pool cars, which promote more efficient use of spaces. Even within car free development disabled parking will be required in line with London Plan standards.

6.8.18 The design of car parking should be consistent with Brent's Domestic Vehicle Footway Cross-Over Policy Guidance. It should support other objectives for Brent including improving design quality and a sense of place, green infrastructure provision, bio-diversity and sustainable drainage. TfL's emerging Design of Car Parking guidance will also provide advice on this matter.

6.8.19 The council will seek the retention of short term publically available parking spaces where they are needed to support town centre vitality and viability or serve an identified need. Town centre development will be required to make available to the public any parking provided. New public off-street parking will be subject to a legal agreement to control the layout of the parking spaces, the nature of the users and the pricing structure. Where parking is created or reallocated, the council will encourage the allocation of spaces for low emission vehicles, car clubs, pool cars, cycle hire and parking, and electric vehicle charging equipment.

NATIONAL & LONDON PLAN

~~London Plan~~ Policy T6 Car parking

~~Emerging Design of Car Parking, TfL~~ MiM227

POLICY BT3 FREIGHT AND SERVICING

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.**^{MM125}

SERVICING IN NEW DEVELOPMENTS

The provision of servicing facilities is required in all development covered by the Plan's standards in Appendix 5. The Council will work with developers to provide the optimum servicing and delivery arrangements for new developments. Wherever possible servicing should be provided off the highway. Loss of existing servicing will be resisted where it is still required to meet operational needs.

Justification

6.8.20 The London Plan policy T7 requires development to facilitate sustainable freight and servicing, from road to rail and water. Proposals for development are to be accompanied by Construction Logistics Plans and Delivery and Servicing Plans. These must be developed in accordance with TfL guidance and reflect the complexity of the development. To reduce pressure on the road network delivery outside of peak hours should be encouraged. Larger developments should include facilities to enable micro-consolidation. The provision of hydrogen refueling stations and rapid electric vehicle charging points at logistics and industrial locations is also supported by London Plan policy. This is to support carbon-free travel from 2050.

6.8.21 Efficient handling and transport of freight is crucial for the regeneration of the industrial areas of the borough. Rail and water are much more sustainable means of transporting freight over longer distances than by road and can be more economic. Even where movement by road is necessary for part of the journey, transshipment to rail/water for the remainder is to be preferred. There are opportunities for rail freight related development within the Park Royal and Wembley Strategic Industrial Locations and by water along the Grand Union Canal.

LONDON PLAN

Policy T7: Freight and Servicing
London Freight Plan, TfL

POLICY BT4 FORMING AN ACCESS ON TO A ROAD

Other than the Transport for London Road Network (TLRN) and London Distributor Roads applications for the creation of an access to a highway or where development will result in the increased use of existing access points will be acceptable where:

- a) access would be safe having regard to the council's cross over guidance;**
- b) the access and amount of off-street parking proposed would be visually acceptable (having regard to existing highway verges and trees affected);**

- c) on Heavily Parked Streets, the proposal does not result in the loss of more than one on-street car parking space, and where there is controlled parking does not result in the creation of more off-street spaces than set out in the parking standards.**

New accesses on the TLRN (the North Circular Road) will be resisted in all cases except where offering improved road safety for all users. A preliminary safety audit must be submitted with all major development proposals which abut the TLRN. New accesses on London Distributor Roads (as shown on the Policies Map) should be resisted where alternative access is available to the side or rear and turning facilities should be provided where possible. Increased use of existing safe access points will be allowed where it does not harm the road's strategic traffic distribution role and particularly that of bus movement.

Justification

- 6.8.22 The priority to promote sustainable modes of transport will help to reduce pressure on the existing highway network. Nevertheless, it is also important that the network should operate efficiently and safely for all users. There is a requirement for a balance to be achieved between different road users' needs. This will depend to a large extent upon the character of the road and its role within the road hierarchy. Where new development requires access to the road network, account needs to be taken of these factors and ensure no adverse highway safety impact.
- 6.8.23 Heavily Parked Streets have been identified across the borough. This has been done for two reasons: to help manage new residential development parking without detrimental impact on highway safety; and so that any new access created would not result in an excessive loss of on-street parking spaces where there is a current shortage. In relation to criterion c) of the policy, greater flexibility to the loss of more than one parking space may in exceptional cases be justified. An example might be where off-street parking provided as part of a proposed development together with other measures would reduce the on-street parking demand compared to the existing use. The council is keen to maintain and enhance the street scene through the provision of green infrastructure. It has an extensive programme of street tree planting.
- 6.8.24 The North Circular Road is a Transport for London Route Network (TLRN) road. It forms a Corridor Link between Brent Cross and Ealing (two major interchange points by public transport as well as by road). It provides a parallel option for through traffic which can help take pressure off the Brent Cross to Wembley and Wembley to Ealing routes which will carry more locally based traffic. The road forms a key element in the London road network in channelling essential traffic, especially freight, away from inner London. Brent is keen to see more of a balanced approach with emphasis on other modes, rather than the needs of car users dominating. To this end there is a general presumption against locating new accesses on to the route. Nevertheless, it is recognised that sometimes additional access is necessary to facilitate regeneration, or that safety improvements could be made through alternative provision. For other

strategic movement corridors, a similar approach to ensuring its function is not unacceptably impacted upon by the development is sought either through capacity or safety issues.

- 6.8.25 In relation to transport matters in development proposals priority should be given to safety issues. This includes the convenience and safety of vulnerable road users such as pedestrians and cyclists. Improvements to road safety should follow recognised guidance, including the Road Safety Action Plan (TfL). This advises that a preliminary safety audit should be submitted with all major development proposals and associated transport changes on the TLRN. TfL has a strategic management function in minimising congestion on its Strategic Road Network. It requires consultation on proposals which would affect this network, which includes Edgware Road and Harrow/Watford Road corridors. Proposals which would affect the M1 Motorway shall require consultation with Highways England. Where a developer is required to undertake works to the highway to make their access acceptable, this will be expected via a section 278 agreement (see Glossary).

7 Delivery and Monitoring

7.1 Delivery

- 7.1.1 The successful delivery of the vision for Brent, the Places and theme policies is reliant upon effective, coordinated and committed delivery from a multiplicity of public agencies; as well as the ability to secure sustained substantial levels of private commercial interest, investment and capacity to support development. This will be at levels realistically not seen in over a generation. It is against a backdrop of significant financial challenges across much of the public sector, operating on much reduced budgets since the commencement of austerity.
- 7.1.2 The Mayor through the London Plan has sought to meet nearly all London's projected housing needs within its boundaries. He has been clear in the London Plan and other lobbying that London's continued growth will require significant additional financial and other support from central Government to ensure successful delivery. This relates not only to supporting housing delivery, but also the associated infrastructure related to population and economic growth. This will require a long term commitment and associated actions from Government. The London Plan currently identifies a total gap between committed and required funds of £3.1 billion per annum. Without providing clarity on how this funding gap will be addressed Government has made it clear that London should deliver more housing than is currently included in the London Plan.
- 7.1.3 The planning process has two main mechanisms for ensuring or contributing to the delivery of some of the infrastructure that will be required related to development that is given planning permission. These are the Community Infrastructure Levy (CIL) and S106 planning obligations. CIL currently is providing about on average £15 million per year towards strategic infrastructure in Brent. Planning obligations are used for requirements not addressed by CIL.

Housing

- 7.1.4 This Plan has been ambitious in seeking to identify long term the delivery of housing sites at a level that is way above recent previous planned levels. Not meeting the Government's Housing Delivery Test provides a significant risk of losing control of how planned development occurs within the borough. The ability of councils to deliver housing has been severely constrained by the borrowing cap, meaning councils are largely reliant on private developers to deliver housing.
- 7.1.5 As such this means that the council has no other realistic option than to grant planning permission for development in accordance with this plan's and national and London Plan policies. This will provide a number of challenges, particularly around associated infrastructure to keep pace with assumed levels of delivery. Whilst providers will be aware of the location and timing of population growth it will however mean that due to funding lags most social infrastructure and some physical infrastructure will be playing catch up after development has been delivered. This will inevitably impact on existing communities.
- 7.1.6 The council in the Plan has sought to plan as best as it can to meet housing needs. As identified by the council's evidence base, there is a chronic need for affordable housing. This is well beyond the private sector's and planning policy's ability through S106 planning obligations to assist delivery through cross subsidisation subsidy on

development sites. Realistically the deficit can only be addressed through greater public sector investment than is currently available to Registered Providers (housing associations) and the council. The council will nevertheless continue through looking at the potential of its own housing estate, but also through direct provision through an arm's length delivery vehicle (company name: I4B) in assisting delivery.^{MiM228}

- 7.1.7 The Mayor has various initiatives to support the build to rent sector, small and medium sized builders and increasing capacity of the construction industry. These if increased and perpetuated will assist in delivery. Where this plan has identified the need for comprehensive redevelopment of larger sites, the council will consider the powers available to it to compulsory purchase sites where delivery is being compromised by landowners not engaging positively to take sites forward.

Transport

- 7.1.8 The London Plan identifies the risk associated with the delivery of new strategic transport projects and on-going^{MiM229} funding for supporting and expanding existing services. The continued necessity in Brent to prioritise people's movement through non-private car modes to limit congestion means that sustained investment in public transport is required. The most significant proposed public transport scheme that is planned within Brent is the opening of the West London Orbital line. The strategic outline business case was published by TfL in June 2019. The council will continue to work closely with TfL and boroughs forming the West London Alliance to facilitate the delivery of the WLO.
- 7.1.9 In terms of cost/benefit analysis the business case is strong. This however, does not necessarily mean it will be funded within current timescales to ensure its envisaged delivery, if at all. It is competing against many other projects for TfL and Network Rail funding. Its lack of delivery will be a significant blow to, but ultimately not fundamentally undermine delivery of the Neasden stations' Growth Area and smaller planned development around Cricklewood and Harlesden. In relation to the Staples Corner Growth Area however, it may well impact on development scale and timing. This area does not have very good public transport accessibility currently. Investor perceptions of the area/market sentiment could well be changed if it is not delivered. This could well impact on the viability of co-location/intensification of the industrial area.
- 7.1.10 In relation to other transport requirements, where sites have specific significant local impacts on infrastructure they will be required to overcome through S106 planning obligations. It is not envisaged that these will be a significant potential blockage to development delivery. The council sets out the investment priorities on an on-going rolling 5 year basis for transportation in its Local Implementation Plan (LIP). This is agreed by the GLA as a mechanism for identifying where its funds will be used to support transportation schemes in the borough.

Education

- 7.1.11 School place planning is complex and made more difficult by the more recent changes in the role that local authorities have, in particular their lack of direct provision. It is increasingly reliant on foundations and free schools on which it has limited influence to provide places. The need for places is often subject to short term cyclical changes. Factors such as economic cycles, people's prosperity, fertility rates,

national sentiment, lifestyles and migration can radically impact on birth rates affecting demand. In addition, the quality of Brent's schools compared to neighbouring boroughs also is a significant factor.

- 7.1.12 The Infrastructure Delivery Plan (2019) assesses existing provision of social infrastructure facilities and identifies the types and quantities, as well as specific locations where they are required to support growth in Brent over the Plan period.
- 7.1.13 In terms of early years and primary school places in the short to medium there is sufficient capacity. One additional primary school is planned in the short term at York House, Wembley Park. The former Oriental City site on Edgware Road is being considered for a Special Education Needs school. Additional capacity equivalent to two new secondary schools is also required within the period to 2024. One school is planned for Chancel House, Church End, whilst expansions to others in the north of the borough are planned. In terms of identifying and planning for future needs, education planners have a good understanding of development patterns and future population trends to be able to deal with growth.
- 7.1.14 The College of North West London is consolidating and relocating from dispersed sites to one site in Wembley Park. This will improve the quality of its teaching facilities and be supported by funds from enabling development on its existing sites.

Health Facilities

- 7.1.15 As with schools, health planning has become more complicated over time. The National Health Service is split up into various layers. Brent has two acute national health hospitals. These are at Northwick Park and Central Middlesex, run by the London North West University Health Trust. The council has on-going dialogue in relation to their estate. Currently both sites are subject to master-planning to allow capacity to meet their future needs and other associated providers (ambulance and Clinical Commissioning Group (CCG)) to be accommodated. The council also works closely with Brent CCG on their estate strategy and in seeking sufficient capacity for General Practitioner surgeries where required on new development sites. Recent examples include the Peel development in South Kilburn and Northfields at Alperton. Subject to early identification of the need for premises from the CCG, and agreement on acceptable premises rents it is not envisaged that there will be significant difficulties in addressing longer term needs arising from developments related to additional premises. There is the potential for expansion of healthcare provision in the Brent area to support growth in adjacent communities and vice versa. The Council and the Brent CCG will work with adjoining boroughs (and OPDC) and relevant CCGs to ensure suitable and timely provision of necessary facilities.^{MiM230}

Utilities

- 7.1.16 In relation to water, electricity, gas and communications feedback received from providers and analysis of longer term infrastructure investment plans indicates no significant barriers to delivery. Thames Water have recently confirmed that previous concerns about medium term capacity in the sewage treatment works that serve Brent have been addressed.
- 7.1.17 For all of these utilities, there might be a need for some local capacity enhancement but as long as developers engage early on in their projects it is not envisaged that there will be significant 'showstopper' events preventing occupation of development.

Green Infrastructure

7.1.18 The most significant piece of new green infrastructure that will be added to Brent will be through the development of a new park at Wembley Park. Elsewhere in relation to the Growth Areas, the master planning process will provide greater clarity on the extent and location of additional green space. The council will continue to seek to work with developers to ensure sufficient provision of space on site and local improvements. A significant project for improvement of existing open space ~~are~~ is the Brent River Park north of the North Circular which will improve bio-diversity and recreational resources as well as contributing to flood alleviation. The council's role in managing parks, open spaces and the public realm will continue to play a significant part in the quality of the green infrastructure network. It also has large implications for sports provision as well, as many playing pitches are within council managed spaces. As in many cases this is non-statutory work, it is likely to be subject to increased budgetary pressures, which will result in amendments to management regimes and different ways of ~~trying~~ seeking to support their continued high quality provision. ^{MiM231}

Cultural Infrastructure

7.1.19 There are two significant improvements that need to be made to existing sports centres. These are at Bridge Park and Vale Farm, both of which essentially need to be replaced. Bridge Park leisure centre plans are more advanced and will be delivered in association with an adjacent development site where the council has a development partner. Vale Farm is less certain at this stage. It is identified as having the potential as a regional sports facility in the Sudbury Neighbourhood Plan. The council will need to work with the Sudbury neighbourhood forum to clarify how this ambition can be met within the parameters of the local green space designation and the realistic funding opportunities that are available. Elsewhere most of the cultural facilities will be provided by trusts, interest and faith groups and also commercial enterprises, reflecting demand/needs related to particular interests. This plan seeks to ensure that existing uses are not lost to more valuable uses, or if they are no longer viable other cultural/community uses are given the opportunity to use that space/site.

Infrastructure Delivery Plan

7.1.20 The council has an Infrastructure Delivery Plan. This will be reviewed on an on-going basis. It will inform the council's capital programme and the work that it does in terms of supporting other agencies delivering infrastructure requirements, particularly through developer contributions, such as Community Infrastructure Levy, and to a much lesser extent due to its more limited role, S106 planning obligations. 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. ^{MM126}

Monitoring

- 7.1.21 The Local Plan will be monitored to enable an understanding of the extent to which the Local Plan policies deliver the Council's vision and objectives for Brent.
- 7.1.22 Monitoring is an important part of the continuous planning process. Changing circumstances means that the monitoring of policies is required to deliver, 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. 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.
- 7.1.23 A set of key indicators and targets have been developed so that the effectiveness of policies in achieving the objectives can be assessed. Where objectives are not being met, appropriate action may be taken which can adjust the outcome or, in some circumstances, a review of policy may be necessary. The targets have been summarised in Figure 39, highlighting the relationship between the policies, indicators and targets.

Figure 39 Local Plan Policy Performance Measures

PERFORMANCE MEASURE	TARGET	SPECIFIC POLICY TO BE MONITORED
<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>	<u>15% 2031</u>	<u>Development Vision</u>
<u>Proportion of the top 20% least deprived areas nationally as identified in the Indices of Multiple Deprivation</u>	<u>2% 2031</u>	<u>Development Vision</u>
Tall Buildings allowed inconsistent with policy	None <u>Zero</u>	BD1 <u>BD2</u>
Residential basements in existing properties allowed that are larger than policy criteria	None <u>Zero</u>	BD2 <u>BD3</u>
Net additional homes built	Meeting the NPPF Housing Delivery Test	BH1
Proportion of Homes Built in Growth Areas	60%	BH2
Built to Rent Properties Net Additions	20% of net additional homes 2019/20-2028/29	BH3

PERFORMANCE MEASURE	TARGET	SPECIFIC POLICY TO BE MONITORED
<u>Percentage of Build to Rent housing to be London Living Rent tenure</u>	<u>100%</u>	<u>BH3</u>
<u>Number of homes built on small sites</u>	<u>443 dwellings per annum</u>	<u>BH4</u>
Percentage of affordable housing within major development with an affordable housing planning obligation.	>35%	BH5
Tenure split of affordable housing within major development with an affordable housing planning obligation.	70% social/ <u>London affordable rent</u> ; below LHA rates 30% intermediate	BH5
Percentage of net additional homes built 3 bedrooms or more	25%	BH6
Additional bed spaces built in communal establishments	No <u>specified</u> target	BH7
Specialist Older Persons Homes Built	230 net additional homes 2019/20-2028/29 average per annum	BH8
Net Number of Additional Gypsy and Traveller Pitches Provided	Consistent with accepted definition <u>outcome of Lynton Close audit</u>	BH9
Net number of dwellings lost where the development results in an overall loss of dwellings	No <u>specified</u> target ¹	BH10
Number of permissions where conversion of an existing 3 bed dwelling results in additional dwelling plus family accommodation	No target <u>No net loss of family sized (3+bedroom) accommodation</u>	BH11
Amount of managed work space provided.	No target <u>10% of employment floorspace within major developments exceeding 3000sqm as affordable workspace</u>	BE1

¹ Reasons for any net loss of dwellings to be explored and clarified within the AMR. MiM?

PERFORMANCE MEASURE	TARGET	SPECIFIC POLICY TO BE MONITORED
Net additional <u>employment industrial</u> floorspace provided in SIL and LSIS <u>and LES</u> by intensification or co-location	No <u>specified</u> target, but definitely no <u>net</u> loss	BE2 and BE3
<u>Net additional industrial</u> floorspace provided in Local Employment Sites	<u>No specified target. Reasons for any net loss of floorspace to be explored and clarified in the AMR</u>	BE3
Additional A4 or A5 <u>drinking establishments and hot food takeaway</u> units granted permission in Primary Shopping Frontages	<u>None Zero</u>	BE4
Proportion of <u>primary frontage</u> in A1 and A2 use.	Proportion of frontage in A1 and A2 use not to fall below 65%, or 50% if vacancy rates exceed 10%.	BE4
Concentration of betting shops, adult gaming centres and pawnbrokers	Proportion of frontage in use as betting shops not to exceed 4%, and proportion in use as adult gaming centres or pawnbrokers not to exceed 3%.	BE5
Concentration of takeaways and proximity of takeaways to <u>primary schools</u> , secondary schools and further education establishments.	Proportion of units in use as takeaways in town centres not to exceed 6%, and no further takeaways within 400 metres of a secondary school or further education establishment.	BE5
Proximity of shisha cafes to secondary school or further establishments.	No further shisha cafes consented within 400 metres of a secondary school or further education establishment	BE5
Number of Visitor Rooms Built	2622 rooms 2015-40	BE9
Number of Buildings on the Buildings at Risk Register	Less than 5	BHC1
Number of public houses lost and not replaced by development.	No <u>net</u> loss in number of <u>viable</u> public houses/ <u>drinking establishments</u>	BHC5
Change in amount of public open space, in Target	+ 5 hectares and in Specific Policy to be monitored	BGI1

PERFORMANCE MEASURE	TARGET	SPECIFIC POLICY TO BE MONITORED
Loss of Category A Tree Preservation Order Trees	None <u>Zero</u>	BGI4-BGI2
Change in Community Infrastructure Floorspace (Schools, Healthcare, Other Community Space, Cultural and Leisure Facilities).	None <u>Zero</u>	BS11
<u>Number of new district heat networks in growth areas</u>	<u>No specified target</u>	<u>BSUI1</u>
<u>Percentage of major developments delivered within Growth Areas and Air Quality Focus Areas that are air quality positive</u>	<u>100%</u>	<u>BSUI2</u>
<u>Percentage of major developments delivered outside of Growth Areas and Air Quality Focus Areas that are air quality neutral</u>	<u>100%</u>	<u>BSUI2</u>
<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>	<u>Zero</u>	<u>BSUI3</u> ^{MM127}
Modal share of journeys by walking, cycling, public transport and private vehicle.	By 2041 80% of all journeys will be undertaken by walking, cycling and public transport.	BT1
Delivery of Site Allocations	Delivery in line with timescales identified in the Local Plan	Site Allocation References

8 Appendices

APPENDIX 1 – No longer necessary

~~8.1 Status of existing Brent Local Plan Policies within the Core Strategy adopted 2010, Site Specific Allocations Document adopted 2011, Wembley Area Action Plan adopted 2015 and Development Management Policies Plan adopted in 2016~~

~~8.1.1 Once adopted, the The policies in this version of the Local Plan will replace the majority of all policies within the Local Plan documents identified above. A small number of policies in the Brent Development Management Policies Plan will be taken forward unchanged with the exception of their policy number.~~

Brent Core Strategy 2010	
Policy Reference	Status
All Policies	Superseded
Site Specific Allocations Document adopted 2011	
Policy Reference	Status
All Policies	Superseded
Wembley Area Action Plan adopted 2015	
Policy Reference	Status
All Policies	Superseded
Development Management Policies Plan adopted in 2016	
Policy Reference	Status
DMP1, DMP2, DMP3, DMP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20 <u>All Policies</u>	Superseded
DMP4a	Now referenced BE7
DMP5	Now referenced BE8
DMP7	Now referenced BHC1
DMP21	Now referenced BHC5 ^{MM128}

Appendix 2

Schedule that shows how London Plan Design Policy & Brent SPD1 Design Principles are inter related ^{MiM232}

London Plan policy (amended Jul 2018)	SPD1 guidance (adopted Nov 2018)	SPD1 principles	London Plan policy
D1B3 OPTIMISING SITE CAPACITY THROUGH THE DESIGN-LED APPROACH	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D1B3, D89, G1
	3.1 Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D1B3, D46, D89
	3.2 Animated facades	Development should ensure active frontage and maximise doors and windows to active ground floor rooms.	D1B3, D46
	3.3 Urban grain	New development should respect existing urban grain and human scale.	D1,
	3.4 Roofscape	Building roofs should be designed to minimise the impact of height and positively respond to the character of the area.	D1,
	3.5 Proportions	Buildings, including window dimensions and void-mass ratio, should be well proportioned; respecting local character.	D1
	3.6 Building materials	Building materials should be durable, attractive and respect local character.	D1
	4.1 Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D46, D78
	4.2 Parking	New developments should provide a suitable amount of parking in a mix of parking solutions that are convenient, efficient and facilitate good urban design.	D1, D78
	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7

	4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D78, G5
	4.5 Public realm	Street design and public realm should reflect the street hierarchy and accommodate for movement and the street as a place accordingly.	D1, D78
	4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D78, G1
D46 Housing quality and standards	3.1 Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D1B3, D46, D89
	3.2 Animated facades	Development should ensure active frontage and maximise doors and windows to active ground floor rooms.	D1B3, D46
	4.1 Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D46, D78
	5.1 Privacy and amenity	New development should provide adequate privacy and amenity for new residents and protect those of existing ones.	D46
	5.2 Private outdoor space	New development should provide good levels of private outdoor space and well-designed communal amenity space for new residents.	D46
	5.3 Bins and bike storage	Services, bin and bike storage, should be designed as part of the building envelope wherever possible; minimising visual impact on the streetscene.	D46
	5.4 Space standards	New development should provide adequate space, access and orientation and adhere to the relevant space standards.	D46
	5.5 Lighting and noise	Buildings and spaces should be designed to minimise potential noise and light pollution.	D46
D78 Public realm	4.1. Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D46, D78,
	4.2 Parking	New developments should provide a suitable amount of parking in a mix of	D1, D78,

		parking solutions that are convenient, efficient and facilitate good urban design.	
	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7
	4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D78, G5
	4.5 Public realm	Street design and public realm should reflect the street hierarchy and accommodate for movement and the street as a place accordingly.	D1, D78,
	4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D78, G1
D89 Tall buildings	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D4B3, D89, G1
	3.1. Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D4B3, D46, D89
G1 Green infrastructure	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D1, D89, G1
	4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D78, G1
G5 Urban greening	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7
	4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D78, G5
G7 Trees and woodlands	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7 ^{MiM233}

Appendix 3

BRENT LOCAL PLAN ANNUAL HOUSING REQUIREMENT-HOUSING DELIVERY TRAJECTORY

Consistent with Policy BH1 'Increasing Housing Supply in Brent' this is a table of the annual delivery targets against which the National Planning Policy Framework's Housing Delivery Test and 5 year Supply of Deliverable Housing Sites will be assessed.

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	
Dwellings		27,482		18,074	45,554
Average Per Year Over Period		2,748		1,807	4,555

<u>Period</u>	<u>Housing Delivery Target Per Annum</u>
<u>First 5 years (2019/20 - 2023/24)</u>	<u>2,325</u>
<u>6-10 years (2024/25 - 2028/29)</u>	<u>2,325</u>
<u>Total First 10 years – consistent with London Plan 2021</u>	<u>23,250</u>
<u>11-15 years (2029/30 - 2033/34)</u>	<u>1,897</u>

16-22 years (2034/35 - 2040/41)	<u>1,897</u>
Total for the next 12 years	<u>22,768</u>
Whole plan period	<u>46,018</u>



MM129

Appendix 4

BRENT PARKING STANDARDS TO BE USED IN ASSOCIATION WITH POLICY BT2 PARKING AND CAR FREE DEVELOPMENT WHICH ARE CONSIDERED NECESSARY RELATED TO BRENT'S CHARACTERISTICS RATHER THAN THOSE IN THE LONDON PLAN ^{MiM234}

Parking for Employment Uses

8.4.1 Parking standards for Class E(g)(i) uses or B1a uses as set out in the London Plan policy T6.2 apply in Brent. For other employment uses in the B and Class E(g)(ii) and Class E(g)(iii) ^{MiM235} use class or closely related sui generis uses, the following standards, as detailed in Table 1, should be applied. The employment areas in Brent have significant variations in levels of access to public transport and other individual characteristics. A distinction is made between areas of the borough to the north and the south of the Dudding Hill railway line as this broadly reflects variations in public transport provision.

8.4.2 The provision of parking in new developments below the standards set out in the table is encouraged (see car free/car capped section).

LOCATION	DEFINITION	MAXIMUM PARKING STANDARD
Inner Brent	South-east of Dudding Hill railway line	1 space per 800m ² gross floor space
Outer Brent	North-west of Dudding Hill railway line	1 space per 200m ² gross floor space

Table 1 - Employment Maximum Parking Standards

Retail Parking

8.4.3 Parking standards as set out in the London Plan policy T6.3 apply in Brent.

Residential Parking

8.4.4 Parking standards as set out in the London Plan policy T6.1 apply in Brent.

Parking for Hotels

8.4.5 The following standards will be applied to hotels:

- a) PTAL 4-6: Operational and disabled parking provision only, with minor exceptions where warranted.
- b) PTAL 1-3: Additional parking allowable up to 1 space per 5 bedrooms if justified by a transport assessment.
- c) One coach parking space should be provided for every ~~50~~ 75^{MiM236} bedrooms.

8.4.6 Only operational and disabled parking should be provided for new hotels in the Major Town Centres of Wembley and Kilburn.

Parking for Residential Institutions Hospitals

8.4.7 For hospitals, these should be assessed individually due to the differing nature of the parking demands depending on the range of treatments offered. There will be a higher level of operational parking required than for other large institutions. A Travel Plan should be developed to ensure that visitor and employee parking is managed. Where existing hospitals are subject to developments or refurbishment, the existing levels of parking should be the starting point, with any additional requirements justified through a transport assessment.

C2 (Other Residential Institutions)/ C4 (Houses of Multiple Occupation)

8.4.8 Other residential institutions such as care homes, homeless hostels, halls of residence and residential schools and colleges and houses of multiple occupation should base the parking provision on the number of bedrooms with a maximum standard of one space per 10 beds. Further visitor parking may be acceptable provided adequate justification is provided through a Transport Assessment. Where the development is for the provision of student halls of residence, in line with recent consented schemes, we will seek car free schemes, due to the low levels of car ownership amongst students.

Parking for non-residential institutions (~~D1~~)

8.4.9 This category covers places of worship, health centres, nurseries and museums, all with varying parking requirements. For all ~~D1~~ non-residential institution^{MiM237} uses, up to 1 car parking space may be provided per 10 users/visitors on site at any one time. However, for developments situated in high PTAL locations, parking provision should be justified by a transport assessment. Longer stay visitor parking should be deterred.

8.4.10 A separate standard applies for schools:

- a) PTAL 1-3: one car parking space per 5 staff; and
- b) PTAL 4-6: operational and disabled provision only, unless otherwise justified through a transport assessment

Parking for Assembly and Leisure

- 8.4.11 This category covers cinemas, bingo halls and theatres along with leisure centres, swimming pools and gymnasiums.
- 8.4.12 In locations with PTALs of 4-6, on-site provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches and deliveries/ servicing. In locations with PTAL of 1-3, provision should be consistent with objectives to reduce congestion and traffic levels and to avoid undermining walking, cycling or public transport.
- 8.4.13 Applicants are encouraged to make use of existing publicly available parking spaces before making on-site provision. Where on-site provision is required, it is proposed that up to 1 car parking space is provided per 10 users/visitors on site at any time. Where venues provide a total capacity over 500 patrons, it is proposed that the level of parking is determined on an individual basis, subject to a detailed transport assessment.

Disabled Parking

- 8.4.14 Disabled parking standards as set out in the London Plan policy T6.1 for residential and T6.5 for non-residential apply in Brent. Council car parks will provide spaces in line with best practice standards.

Cycle Parking

- 8.4.15 Cycle parking standards as set out in the London Plan policy T5 apply in Brent.

APPENDIX 5

BRENT NON RESIDENTIAL PREMISES SERVICING STANDARDS AS REQUIRED IN ASSOCIATION WITH POLICY BT3 'FREIGHT AND SERVICING, PROVISION AND PROTECTION OF FREIGHT FACILITIES'

MiM238

A1 E(a) Retail

- 8.5.1 For A1 E(a) ^{MiM239} retail units less than 500m² gross floor area, one transit sized bay for service vehicles should be provided. Food retail units of over 500m² should provide 12m bays for servicing. For larger A1 retail units over 2000m², one full size lorry bay per 2000m² for service vehicles should be provided.
- 8.5.2 If the development forms part of a group of smaller units, the total floor area of the entire groups of units should be used to determine the number of service vehicle bays. Existing service facilities should also be taken into account.

A3 E(b) ^{MiM240} Food and Drink Establishments

- 8.5.3 Standards should be provided on a site specific basis, depending on the size of service vehicles and each location.

B1 E(g) ^{MiM241} Business

- 8.5.4 For units under 100m² one transit sized bay for service vehicles should be provided. Units over 100m² should provide service space only for 8m rigid service vehicles, as opposed to full sized (10m) rigid vehicles at each location.

B2 General Industry and B8 Warehouse

- 8.5.5 Units under 300m² should provide a loading bay that can accommodate an 8m rigid vehicle. Units between 300m² and 1000m² should provide a loading bay for 10m rigid vehicles. Beyond 1000m², there should be provision of full- sized 16.5m loading bays.

C1 Hotels

- 8.5.6 In addition to the coach parking provision standards, new hotel developments should also provide a loading bay for at least one 8m sized rigid vehicle. Any specific sites with alternative requirements should be reviewed separately.

APPENDIX 6

Strategic Policies in the new Brent Local Plan for the purposes of Neighbourhood Planning

8.6.1 The NPPF requires Plans to make it explicit which are strategic policies.

Strategic Policies	Non-Strategic Policies
<p>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, BSI1, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BT1, BT2, BT3, BT4</p>	<p>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</p>
	<p><u>4. DEVELOPMENT VISION AND GOOD GROWTH IN BRENT POLICIES:</u> <u>DMP1</u> Development Management General Policy</p>
<p><u>Chapter 5 ALL PLACE POLICIES:</u> <u>BP1, BP2, BP3, BP4, BP5, BP6, BP7</u></p>	<p>=</p>
<p><u>Chapter 5 ALL GROWTH AREA POLICIES:</u> <u>BCGA1, BEGA1A, BEGA2A, BEGA1, BEGA2, BNGA1, BNWGA2A, BNWGA1, BNWSA1, BSGA1, BSEGA1, BSWGGA1</u></p>	<p>=</p>
<p><u>CHAPTER 5 ALL SITE ALLOCATION POLICIES:</u> Central Place: <u>BCSA1-BCSA20</u> East Place: <u>BESA1-BESA3</u> North Place: <u>BNSA1-BNSA8</u></p>	<p>=</p>

<p>North West Place: <u>BNWSA1</u> South Place: <u>BSSA1-BSSA19</u> South East Place: <u>BSESA1-BSESA35</u> South West Place: <u>BSWSA1-BSWSA17</u></p>	
<p>CHAPTER 6.1 DESIGN: <u>BD1</u> Leading the Way in Good Urban Design <u>BD2</u> Tall Buildings in Brent</p>	<p><u>BD3</u> Basement development</p>
<p>CHAPTER 6.2 HOUSING: <u>BH1</u> Increasing Housing Supply in Brent <u>BH2</u> Priority Areas for Additional Housing Provision within Brent <u>BH3</u> Build to Rent <u>BH4</u> Small Sites and Small Housing Developments in Brent <u>BH5</u> Affordable Housing <u>BH6</u> Housing Size Mix <u>BH7</u> Accommodation with Shared Facilities or Additional Support <u>BH8</u> Specialist Older Persons Housing <u>BH9</u> Gypsy and Traveller Accommodation <u>BH10</u> Resisting Housing Loss <u>BH11</u> Conversion of Family Sized Dwellings</p>	<p><u>BH12</u> Residential Outbuildings <u>BH13</u> Residential Amenity Space</p>
<p>CHAPTER 6.3 SOCIAL INFRASTRUCTURE: <u>BSI1</u> Social Infrastructure and Community Facilities</p>	<p>=</p>
<p>CHAPTER 6.4 ECONOMY AND TOWN CENTRES: <u>BE1</u> Economic Growth and Employment Opportunities for all <u>BE2</u> Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) <u>BE3</u> Local Employment Sites and Work-Live <u>BE4</u> Supporting Strong Centres <u>BE9</u> Visitor Accommodation and Attractions</p>	<p><u>BE5</u> Protecting Retail in Town Centres, Betting Shops, Adult Gaming Centres and Pawnbrokers <u>BE6</u> Neighbourhood Parades and Isolated Shop Units <u>BE7</u> Shop Front Design and Forecourt Trading <u>BE8</u> Markets and Car Boot Sales</p>
<p>CHAPTER 6.5 HERITAGE AND CULTURE: <u>BHC1</u> Brent's Heritage Assets <u>BHC2</u> National Stadium Wembley <u>BHC3</u> Supporting Brent's Culture and Creative Industries <u>BHC4</u> Brent's Night Time Economy <u>BHC5</u> Public Houses</p>	<p>=</p>
<p>CHAPTER 6.6 GREEN INFRASTRUCTURE <u>BGI1</u> Green and Blue Infrastructure in Brent <u>BGI2</u> Trees and Woodlands</p>	<p>=</p>
<p>CHAPTER 6.7 SUSTAINABLE INFRASTRUCTURE</p>	<p>=</p>

<p><u>BSUI1</u> Creating a Resilient and Efficient Brent</p> <p><u>BSUI2</u> Air Quality</p> <p><u>BSUI3</u> Managing Flood Risk</p> <p><u>BSUI4</u> On-site Water Management and Surface Water Attenuation</p>	
<p>CHAPTER 6.8 TRANSPORT</p> <p><u>BT1</u> Sustainable Travel Choice</p> <p><u>BT2</u> Parking and Car Free Development</p> <p><u>BT3</u> Freight and Servicing, Provision and Protection of Freight Facilities</p>	<p><u>BT4</u> Forming an Access on to a Road^{MM130}</p>

Glossary

Accessibility Management Plan: A plan which sets out how accessibility and inclusion will be monitored and maintained throughout the life of a development.

Adult Gaming Centre: An adult gaming centre is a place of gambling where access is restricted to persons over 18.

Affordable housing: defined by Government in the NPPF 2018 as: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Air Quality Management Area (AQMA): An area which a local authority has designated for action, based upon a prediction that Air Quality Objectives will be exceeded.

Betting Shop: A store where the primary activity on the premises is betting services. Each premises is permitted to have up to four gaming machines, known as fixed odds betting terminals.

Compulsory Purchase Order (CPO): A legal function that allows certain bodies which need to obtain land or property to do so without the consent of the owner.

Decentralised Energy Network: The local generation of electricity and where appropriate, the recovery of the surplus heat (combined heat and power – CHP) for purposes such as building space heating and domestic hot water production.

Forecourt Trading: Trading from a designated area which is connected to the frontage of a shop and either on the public footway or private land. Also known as street trading.

Greenfield Run-off Rates: The rate of run-off that would occur from the site in its undeveloped and therefore undisturbed state.

Green roof: Also known as an eco-roof, living roof, or vegetated roof, is one that is either partially or completely covered in vegetation on top of the human-made roofing structure.

Heavily Parked Street: Streets where the percentage of cars parked on-street exceeds 80%, the safe and legal maximum level of parking.

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.^{MM131}

Live: Work Premises: Purpose-built premises, or purposely converted units, comprising a mix of residential and business uses which cannot be classified under a single class within the Use Classes Order.

Local Employment Sites: Sites, outside of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), which provide, or are capable of providing, local employment opportunities. These sites include those on the fringes of SIL and LSIS, scattered large sites and smaller sites dispersed throughout the borough including those in residential areas.

Locally Significant Industrial Sites (LSIS): Industrial sites identified in the Local Plan as being of significance to Brent's economy. Occupancy within these sites is generally similar to that within SIL, but is more varied and may include office or trade uses.^{MM132}

Lifetime Neighbourhood: Places where, in view of an ageing society, transport, basic amenities, green spaces, decent toilets, and places to meet and relax, are consciously

planned for people of all ages and conditions in mind within easy reach of homes, accessible to all and planned into proposals at the outset.

Main Town Centre Uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Major Developments: 10 or more residential units (or if a number is not given, where the area is more than 0.5 hectares), or 1000 sq m (or more) gross commercial floorspace.

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. ^{MM133}

Meanwhile Uses: The temporary use of vacant buildings or land for a socially beneficial purpose until such a time that they can be brought back into commercial use again.

Metropolitan Open Land: MOL are strategically important open spaces to London. MOL performs 3 valuable functions:

- a) to provide a clear break in the urban fabric and contribute to the green character of London;
- b) to serve the needs of Londoners outside their local area; and
- c) contains a feature or landscape of national or regional significance. MOL is afforded the same level of protection as the Green Belt and the London Plan stresses that there should be a presumption against development in these areas.

Neighbourhood Parades and Isolated Shop Units: Neighbourhood Centres and isolated units are located outside of designated town centres. These shops serve a local retail need and play an important social role in the community as well as contributing to the character and function of the local area.

Open Space: All land in Brent that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a the broad range of types of open space, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Opportunity Areas: Areas designated in the London Plan as London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing.

Pawnbroker: A store which offers loans in exchange for personal property as equivalent collateral. In Brent many of these stores also provide a payday loan service.

Payday loan shops: A company that lends customers small amounts of money at high interest rates, on the agreement that the loan will be repaid when the borrower receives their next wages.

Playing Field: A playing field is an area containing at least one playing pitch (0.2 ha or more, including run-offs), irrespective of ownership.

Playing Pitches: A playing pitch means a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015).

Primary Frontages: Frontages comprising a high proportion of retail uses which may include food, drinks, clothing and household goods. Primary frontage is shown on the Polices Map.

Primary shopping area: Defined area where retail development is concentrated..

Public Transport Accessibility Level (PTAL): A detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability.

Quiet Areas: The Environmental Noise (England) Regulations 2006 (as amended) require that Noise Action Plans for agglomerations (including much of Greater London) include provisions that aim to protect any formally identified 'Quiet Areas' from an increase in road, railway, aircraft and industrial noise.

Secondary Frontage: That part of a shopping centre outside the primary frontage, usually on the fringe, where units provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses. Secondary frontage is shown on the Polices Map.

Section 278 Agreement: A legally binding agreement between the Local Highway Authority and the developer to ensure that the work to be carried out on the highway is completed to the standards and satisfaction of the Local Highway Authority.

Small and Medium Enterprises (SMEs): Defined in EU law as enterprises which employ fewer than 250 people and which have an annual turnover not exceeding €50m, and/or an annual balance sheet total not exceeding €43m.

Social Infrastructure: A wide variety of services that are essential to the sustainability and wellbeing of a community such as education facilities, places of worship, health provision, community, cultural, recreation and sports facilities.

Strategic Industrial Location (SIL): These exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including general and light Industrial uses, logistics, waste management and environmental

industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.

Studio Flat: Also known as a studio apartment, a small apartment which combines living room, bedroom, and kitchenette into a single room.

Sustainable Urban Drainage System (SuDS): An alternative approach from the traditional ways of managing runoff from buildings and hardstanding. They can reduce the total amount, flow and rate of surface water that runs directly to rivers through stormwater systems.

Transport for London Route Network (TLRN) Road: The Transport for London Route Network is made up of roads that are owned and maintained by Transport for London (TfL). They are the key routes or major arterial roads in London.