

GREATER LONDON AUTHORITY

Paul Lewin

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Department: Planning

Our reference: LDF04/LDD17/LP04/HA01
Date: 12 August 2021

By email: planningstrategy@brent.gov.uk
[REDACTED]

Dear Paul,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Brent Local Plan: Consultation on Proposed Main Modifications

Thank you for consulting the Mayor of London on the proposed Main Modifications to Brent's Local Plan following the Examination Hearing sessions. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments on the Regulation 19 version of the draft Brent Local Plan on 05 December 2019 (Reference: LDF04/LDD17/LP03/HA01) and agreed a Statement of Common Ground with Brent on 1st October 2020¹.

The London Plan 2021 was formally published on the 2 March 2021, and now forms part of Brent's Development Plan and contains the most up-to-date policies.

The Deputy Mayor has carefully considered the proposed main modifications and is of the opinion that the draft Local Plan is in general conformity with the London Plan 2021 (LP2021).

The Mayor has afforded me delegated authority to make more detailed comments on his behalf which are set out below. Representations from Transport for London (TfL), which I endorse, are included and attached to this response.

¹ <https://www.brent.gov.uk/media/16417068/brent-statement-of-common-ground-for-the-mayor-oct-2020-final.pdf>

Detailed comments on the proposed main modifications to Brent’s Local Plan are set out in the table below.

Main Modification Reference	Policy / Paragraph	Mayor’s response
MM3	Chapter 4	The Mayor notes and welcomes the clear recognition of the housing target set out in Table 4.1 of the LP2021 to deliver at least 23,250 new homes between 2019 and 2029.
MM7 and others	Policy BP1 and throughout	The Mayor welcomes the intention to amend the term ‘employment’ to ‘industrial’ where appropriate throughout the document to ensure the appropriate protection, intensification and future development of industrial land.
MM12	BCSA4	The intention to maximise the re-provision of industrial floorspace as part of future redevelopment of the site is welcomed.
MM14	BCSA6	The intention to maximise the re-provision of industrial floorspace as part of future redevelopment of the site is welcomed.
MM16	BCSA8	The Mayor welcomes that should the current plans for the site be changed in the future that maximum industrial floorspace re-provision will be sought.
MM24	BP2	The Mayor welcomes the retention and promotion of the intensification of industrial uses within the Kingsbury Locally Significant Industrial Site (LSIS) in accordance with Policy E7 of the LP2021.
MM28	BEGA1	The Mayor made it clear in his responses to the Local Plan Regulation 18 and 19 consultations that the part of the site allocation which is currently designated as Strategic Industrial Land (SIL) should be clearly identified. Brent’s intention to downgrade that part of the site from SIL to LSIS has only now been made explicitly clear. The intention to do so should be made much clearer in the site allocation, supporting text and illustrated in maps. That part of the site which is to be downgraded to LSIS is a part of the Wembley SIL and it is noted that proposed Map Modification 32 (see comment later on) would also result in a large additional part of the SIL being released from its industrial designation. Combined, the downgrading and release of this SIL would result in a significant reduction of the Wembley SIL as a whole, and the draft Plan should explain how this SIL industrial capacity would be reprovided elsewhere and evidence should be used to support the approach in accordance with Policy E7 of the LP2021. For example, will the remaining part of the Wembley SIL support industrial intensification to offset the proposed loss? If so, this should be explained clearly and supported by evidence. The same part of the site allocation is home to a safeguarded waste site, as set out in the West London Waste

		Plan. Plans for the future of the waste site should be made clear and if it is to remain where it currently is, it should be noted that the downgrading of the SIL could jeopardise the safeguarded waste site's ability to effectively function, especially if residential development were to be introduced as a result of co-location. Paragraph 9.8.11 of the LP2021 should be noted, which sets out that land within the SIL will provide the main opportunities for locating waste treatment facilities. On the other hand, if the waste site is to be re-located, this should be planned for as part of a waste plan so that it is consistent with Policy SI 9 of the LP2021. Brent should also note the guidance set out in paragraph 9.8.20 of the LP2021 which makes it clear that Agent of Change principles should be followed so that developments adjacent to waste management facilities are designed to minimise the potential for disturbance and conflicts of use. Further explanation of Brent's intended approach should be provided and supported by appropriate evidence.
MM35	BNSA1	The Mayor welcomes the requirement for a masterplan approach prior to the introduction of non-industrial uses within the area which is consistent with Policy E7 of the LP2021.
MM37	BNSA3	The Mayor welcomes the requirement for a masterplan approach prior to the introduction of non-industrial uses within the area which is consistent with Policy E7 of the LP2021, which would result in maintaining or exceeding the current level of industrial capacity
MM48	BSSA1	The Mayor welcomes the requirement for a masterplan approach prior to the introduction of non-industrial uses within the area which is consistent with Policy E7 of the LP2021, which would result in maintaining or exceeding the current level of industrial capacity
MM49	BSSA2	The Mayor welcomes the requirement for a masterplan approach prior to the introduction of non-industrial uses within the area which is consistent with Policy E7 of the LP2021, which would result in maintaining or exceeding the current level of industrial capacity
MM51	BSSA4	The Mayor welcomes the requirement for a masterplan approach prior to the introduction of non-industrial uses within the area which is consistent with Policy E7 of the LP2021, which would result in maintaining or exceeding the current level of industrial capacity
MM78	BSEA21	The Mayor welcomes that an increase in industrial floorspace will be sought as part of any future redevelopment of the site in accordance with Policy E7 of the LP2021.
MM83	BSWSA1	The Mayor welcomes the requirement for a masterplan approach prior to the introduction of non-industrial uses within the area which is consistent with Policy E7 of the

		LP2021, which would result in maintaining or exceeding the current level of industrial capacity
MM94	Policy BD2	The Mayor notes and welcomes the proposed amendments to Policy BD2 which now clearly identifies those areas that are and those areas which are not suitable for tall building development. Directions received from the Secretary of State in December 2020 ² in relation to the London Plan 2021 resulted in changes to Policy D9 Tall buildings. In light of those and the proposed modifications, Brent's approach to tall buildings is consistent with Policy D9 of the LP2021.
MM108	Policy BE2	The Mayor welcomes the proposed amendments which were agreed between the Mayor and the London Borough of Brent through a Statement of Common Ground signed on the 1 st and 2 nd October 2020. These agreed amendments resulted in the Mayor withdrawing his position that the draft Plan was not in general conformity with the London Plan.
Map Mod 1-5		The Mayor welcomes the clear identification of waste sites as set out in the West London Waste Plan which is in line with Policy SI 9 of the LP2021.
Map Mod 11		The Mayor welcomes the removal of the site as the introduction of non-industrial uses within SIL is not consistent with Policy E7 of the LP2021.
Map Mod 32		This proposed modification would result in a large portion of the Wembley SIL being released from its industrial designation. The intention to release this part of the Wembley SIL has only now been made clear and is currently home to Ikea and Tesco. While not in industrial use at present, it does provide a realistic opportunity for strategic industrial development. If this SIL capacity is to be reprovided elsewhere then Brent should explain this clearly and support the approach with appropriate evidence in line with Policy E7 of the LP2021.
MiM166		The Mayor welcomes the proposed amendments which were agreed between the Mayor and the London Borough of Brent through a Statement of Common Ground signed on the 1st and 2nd October 2020. These agreed amendments resulted in the Mayor withdrawing his position that the draft Plan was not in general conformity with the London Plan.
MiM167		The Mayor welcomes the proposed amendments which were agreed between the Mayor and the London Borough of Brent through a Statement of Common Ground signed on the 1st and 2nd October 2020. These agreed amendments resulted in the Mayor withdrawing his position that the draft Plan was not in general conformity with the London Plan.
MiM168		The Mayor welcomes the proposed amendments which were agreed between the Mayor and the London Borough of Brent through a Statement of Common Ground signed on the 1st

² https://www.london.gov.uk/sites/default/files/201210_sos_annex_b_further_directions.pdf

		and 2nd October 2020. These agreed amendments resulted in the Mayor withdrawing his position that the draft Plan was not in general conformity with the London Plan.
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Next steps

I hope these comments positively inform the ongoing preparation of Brent’s Local Plan. We have welcomed the collaboration to date between our respective teams and we look forward to continuing to work with you to ensure it aligns with the LP2021 as well as delivering Brent’s objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]



ANNEX 1 – Transport for London Representation

Transport for London
City Planning
5 Endeavour Square
Westfield Avenue
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London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

10 August 2021

Dear Sir/Madam,

Re: Brent Local Plan Proposed Modifications – July 2021

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments reflect TfL's role in implementing the Mayor's transport policies as set out in the London Plan and Mayor's Transport Strategy and as a transport operator and strategic highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development Planning (TfL Property) to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on Brent Local Plan Proposed Modifications - July 2021. The London Plan 2021 has recently been published and now forms part of Brent's development plan.

We welcome the inclusion in the Main Modifications of a large number of changes that we requested in our Regulation 19 consultation response. We welcome strengthened requirements to provide funding towards transport infrastructure improvements including at Alperton and Stonebridge Park stations as well as recognition of the need to take account of the proximity of rail infrastructure in a number of site allocations.

A key concern at previous stages was the three site allocations that include operational bus garages. These sites are not in TfL ownership, but they are very important in supporting the local bus network and their loss would be contrary to strategic policies on the retention of transport land.

Although the three bus garages have not been removed from the site allocations as we had originally suggested, we are pleased to note that the proposed modifications include appropriate wording to ensure retention of bus garage capacity.

Although we are supportive of the broad approach to parking and car free development where this is in line with London Plan parking policies, TfL has concerns about the approach for employment uses. The London Plan seeks to promote economic development that makes the fullest use of the public transport and active travel networks and encourages boroughs to support the growth of sustainably located employment. This is particularly important given that workplaces generate a significant volume of regular trips during the peak hours of congestion. Every opportunity to reduce the proportion of these trips made by car – both through a development’s location and design and through parking restraint – must be taken to deliver good growth.

It is disappointing that the proposed modifications have not made changes to the employment parking standards in appendix 4. These changes had previously been agreed in writing with TfL. We can supply correspondence that indicates Brent Council’s intention to modify the wording. However, these changes have not been included in the main or minor modifications. As a result, the proposed parking standard for the Egii/Egiii (formerly B1b/c) use classes for developments in the Wembley Opportunity Area is not in conformity with the London Plan. We therefore object to minor modification MiM235 which does not reflect the agreed wording. Our preference would still be for the employment parking standards to defer to the standards in Table 10.4 of the London Plan 2021 for all Eg (B1) uses. We trust that you will be able to correct this omission as had previously been agreed.

We look forward to continuing our work together in finalising the document. We are committed to continuing to work closely with GLA colleagues to help deliver integrated planning and make the case for continued investment in transport capacity and connectivity to unlock further development and support future growth.

Yours sincerely,

[Redacted signature]

London Plan and Planning Obligations team | City Planning

[Redacted contact information]



Appendix A: Specific suggested edits and comments from TfL on Brent Local Plan Proposed Modifications – July 2021

Modification	Section	TfL response
MM13	BCSA5	We welcome the updated text which now states that car free development should be prioritised.
MM15	BCSA7 Wembley Park Station	<p>We welcome the division into two separate site allocations. We also welcome the addition of a requirement that ‘The development should not compromise the ability to add potential platforms at Wembley Park station on the Chiltern Line Aylesbury Branch.’</p> <p>TfL Commercial Development (TfL CD) has been working on proposals for residential-led mixed use development on land around the station, including Wembley Park station car park, which comprises the ‘Wembley Park Station South’ allocation. Further comments on their development proposals are provided in the separate response prepared by TfL CD.</p>
MM22	BCSA20	We welcome the separation of this site from BCSA7. We also welcome the statement that a car free development would be desirable
MM26	BEGA1A Neasden Stations Growth Area	We welcome the statement that ‘Space will be provided for and the development will integrate with a potential new West London Orbital Station accommodated adjacent to Neasden Lane.’ However, we would like to see the amended wording setting out more clearly a requirement for sufficient land to be safeguarded and for development of the site to contribute directly to either the delivery of a new station should the plans for the West Orbital rail link proceed within an appropriate timescale or to station improvements at the existing Neasden station.

Modification	Section	TfL response
MM28	BEGA1 Neasden Stations Growth Area	<p>We welcome the requirement for development to take account of the operational requirements of rail infrastructure and the need to provide mitigation for any impacts and to consider the potential for a future bus/cycle/pedestrian link between Neasden Lane and Great Central Way and, if possible, allow sufficient space within the layout to allow this longer term aspiration to be delivered.</p> <p>Under infrastructure requirements we welcome acknowledgement that Neasden station has a constrained ticket hall and stairways and that TfL has identified that there may be a need to consider station improvements to accommodate development related demand, with associated financial contributions. We also welcome reference to space being provided for a West Orbital line station with potential for platforms for 8 car trains.</p> <p>We welcome the requirement for engagement with TfL and Highways England and the submission of an independent Transport Assessment taking account of updates to TfL strategic modelling and mitigation for any impacts on the strategic road network.</p>
MM29	BEGA2 Staples Corner Growth Area	<p>We welcome the intention to work with TfL to secure a car free development and to improve links across the A5 and North Circular to rail stations. Concerns about overspill parking should be addressed through the use of appropriately targeted parking controls including the use of CPZs as advocated in policy T6.1 of the London Plan 2021.</p> <p>The potential opening date for the West London Orbital should be changed from 2026 to 2029.</p> <p>We welcome the requirement for engagement with TfL and Highways England and the submission of an independent Transport Assessment taking account of updates to TfL strategic modelling and mitigation for any impacts on the strategic road network.</p>

Modification	Section	TfL response
MM31	BESA2 Cricklewood Bus Garage	TfL's current view is that the site is ideally suited to a bus garage and that the bus garage use should be retained. Therefore, we do not support the amended wording of the allocated use that now refers to replacement or relocation of the bus depot. We support the addition of wording in the 'Planning Considerations' which states that '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.'
MM36	BNSA2 Colindale Retail Park	We object to deletion of the following sentence: 'The council will encourage the use of lower parking provision, in line with London policy.' Now that the London Plan 2021 has been published it is even more important that lower parking provision is encouraged to ensure that there is consistency with policy T6.1.
MM37	BNSA3 Queensbury LSIS and Morrisons	We welcome the addition of wording to clarify that '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'
MM41	BNWGA1A - Northwick Park Growth Area	We welcome the requirement that supporting infrastructure will need to be included in a forthcoming masterplan, TfL looks forward to working with the Council and other stakeholders to develop the masterplan. We support the requirement for 'Improvements to site accessibility, prioritising funding toward the most sustainable modes of transport'.

Modification	Section	TfL response
MM42	BNWGA1 – Northwick Park Growth Area	<p>We welcome recognition of TfL ownership of Northwick Park station and adjacent railway land. TfL CD Planning will respond separately on issues relating to land ownership and development potential. We note that there is now a requirement to provide step free access to all platforms at Northwick Park station</p> <p>TfL is working with Brent Council to increase capacity and introduce step free access at Northwick Park station. However, the wording needs to make it clear that proposed development on the wider site would be expected to provide a significant contribution towards these works. TfL is not able to provide a commitment to these works without significant third party funding. The list of infrastructure requirements only lists ‘Improvements to the capacity of, and pedestrian accessibility to, Northwick Park Station.’ It should be made clear that the development will also need to deliver step free access to reflect the amended wording under planning considerations.</p>
MM43	BNWSA1 – Kenton Road Sainsbury’s	<p>Although we support the principle that ‘If parking is provided it should be made publicly available and be designed to serve the wider town centre’, based on the estimated future PTAL of 5 – 6a, all retail and residential development should be car free to ensure compliance with the London Plan 2021. This should also be reflected under the amended infrastructure requirements where the statement that ‘An appropriate amount of car parking spaces will need to be retained for the superstore’ is no longer appropriate following publication of the London Plan 2021.</p> <p>We welcome the addition of wording to clarify that ‘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.’</p>
MM48	BSSA1	We welcome additional wording that recognises the site has potential for car free development.
MM49	BSSA2	We welcome additional wording that recognises the site has potential for car free development.

Modification	Section	TfL response
MM52	BSSA5 Willesden Bus Depot	<p>We support the addition of wording in the 'Planning Considerations' which states that '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.'</p> <p>We welcome the statement that 'The site has high PTAL which means development should be car free'.</p> <p>We do not support the addition of 'or a range of industrial uses' to the justification. This implies that a range of industrial uses could be an acceptable alternative to re-provision of the bus depot which is not the case.</p>
MM53	BSSA6 Argenta House and Wembley Point	<p>We welcome amended wording stating that 'Car free development should be the starting point' and the removal of a requirement that this is 'subject to a Controlled Parking Zone being achieved'.</p> <p>We welcome the requirement that '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'.</p>
MM54	BSSA7 Bridge Park and Unisys Building	<p>We welcome encouragement of car free development and the removal of a requirement that this is 'subject to a Controlled Parking Zone being achieved'.</p> <p>We welcome the requirement that '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'.</p>
MM58	BSESA1	We welcome amended wording stating that 'Car free development should be the starting point.'
MM59	BSESA2	We welcome amended wording stating that 'Car free development should be the starting point.'
MM60	BSESA3	We welcome amended wording stating that 'Car free development should be the starting point.'
MM62	BSESA5	We welcome amended wording stating that 'Car free development should be the starting point.'
MM63	BSESA6	We welcome amended wording stating that 'Car free development should be the starting point.'
MM64	BSESA7	We welcome amended wording stating that 'Car free development should be the starting point.'

Modification	Section	TfL response
MM65	BSESA8	We welcome amended wording stating that 'Car free development should be the starting point.'
MM66	BSESA9	We welcome amended wording stating that 'Car free development should be the starting point.'
MM67	BSESA10	We welcome amended wording stating that 'Car free development should be the starting point.'
MM68	BSESA11	We welcome amended wording stating that 'Car free development should be the starting point.'
MM70	BSESA13	We welcome amended wording stating that 'Car free development should be the starting point.'
MM71	BSESA14	We welcome amended wording stating that 'Car free development should be the starting point.'
MM72	BSESA15	We welcome amended wording stating that 'Car free development should be the starting point.'
MM73	BSESA16	We welcome amended wording stating that 'Car free development should be the starting point.'
MM74	BSESA17	We welcome the removal of the infrastructure requirement 'Potentially parking'. However, this should be reinforced with a statement that 'Car free development should be the starting point' in line with other site allocations with a similar PTAL.
MM76	BSESA19	We welcome amended wording stating that 'Car free development is the starting point for development.'
MM77	BSESA20	We welcome amended wording stating that 'Car free development is the starting point for development.'
MM78	BSESA21	We welcome amended wording stating that 'Car free development is the starting point for development.'

Modification	Section	TfL response
MM83	BSWSA1	<p>Although negotiations are ongoing about securing a replacement bus garage site in connection with proposed development that would include Alperton bus garage, we support the addition of wording in the 'Planning Considerations' which states that '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.'</p> <p>We welcome the addition of wording to clarify that '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.'</p> <p>We welcome the requirement that '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.'</p>
MM84	BSWSA2	<p>In relation to the bus stand on Glacier Way, we welcome the addition of a requirement that 'This must be retained or enhanced as part of any development and early discussion with TfL London Buses on this should take place.'</p> <p>We welcome the requirement that '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.'</p>

Modification	Section	TfL response
MM85	BSWSA3	<p>We welcome the addition of wording to clarify that ‘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.’</p> <p>We welcome the requirement that ‘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.’</p>
MM86	BSWSA4	<p>We welcome the requirement that ‘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.’</p>
MM87	BSWSA5	<p>We welcome the requirement that ‘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.’</p>
MM88	BSWSA6	<p>We welcome the requirement that ‘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.’</p>
MM89	BSWSA7	<p>We welcome the following infrastructure requirement: ‘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’.</p> <p>We welcome the addition of wording to clarify that ‘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.’</p>

Modification	Section	TfL response
MM123	BT1	<p>We welcome the addition of a reference to London Plan standards in part c when referring to cycle parking requirements.</p> <p>We welcome the amendments to part k to set out how the bus network will be supported.</p>
MM124	BT2	<p>We welcome amendments to the first paragraph to clarify that car free development ‘should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking’.</p>
MM125	BT3	<p>We welcome amendments to this policy to support freight consolidation and to give greater protection for sites that have potential for water or rail freight use.</p>
MiM235	Appendix 4 8.4.1	<p>We object to the modification which does not reflect the agreed wording which should have been put forward in response to TfL’s Regulation 19 response set out in Brent’s consultation response document submitted in February 2020 as part of the EiP process. The consultation response included the action 8.4.1 Amend: “Parking standards for B1a uses in outer London as set out in the London Plan policy T6.2 apply to all B1 uses in Brent. For office development south of the Dudding Hill Line Inner London standards will apply.”</p> <p>The absence of this amendment from the list of proposed modifications was raised in correspondence between TfL and Brent when preparing the Statement of Common Ground in July 2020. At the time the Brent planning officer confirmed that ‘we will also include this proposed modification within our response to the inspectors MIQ’s’. We trust that this omission can be corrected. We can forward the relevant correspondence if this is helpful.</p>

