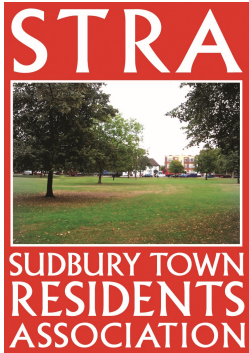


[REDACTED]

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**From:** STRA Planning [REDACTED]  
**Sent:** 07 September 2021 17:17  
**To:** Lewin, Paul  
**Cc:** [REDACTED]

**Subject:** RE: Draft Local Plan Main Modifications Public Consultation ends 19 August 2021



Dear Mr. Paul Lewin,

Thank you for contacting STRA to confirm our submission details.

**We have revised the email, sent at 16.45 today because it could not be delivered and removed all attachments.**

STRA would like to express our concerns regarding the recent Main Modifications Public Consultation. Our understanding is that the purpose of the Main Modifications Public Consultation is to consult the public regarding some changes made in the wording of the Draft Local Plan. Simultaneously, as part of actions agreed with the Inspectors at the Examination Hearings held in September / October 2020, new documents have been introduced. These new documents intend to add clarity, the Council's methodology and justifications for strategies, policies and site allocations. However, these new documents extend beyond the guidance of the Inspectors and lead to major material changes in the Draft Local Plan.

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[REDACTED]

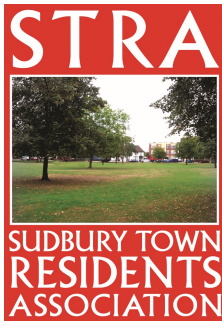
[REDACTED]

[REDACTED]

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STRA Team

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[Redacted signature]

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[REDACTED]

[REDACTED]

[REDACTED]

*Independent*

*Intercultural*

*Imj*

On 01/09/2021 16:31 Lewin, Paul wrote:

Dear STRA planning

Do you wish for your last e-mail below to be registered as a representation on the proposed modifications consultation?

Regards

Paul Lewin

Team Leader Planning Policy

Regeneration & Environment

Brent Council

0208 937 6710

[www.brent.gov.uk](http://www.brent.gov.uk)

[@Brent\\_Council](https://twitter.com/Brent_Council)

We are working hard to maintain high standards of service delivery, but due to the impact of the Covid-19 virus, please be patient as there could be an impact on our ability to respond in the usual manner.

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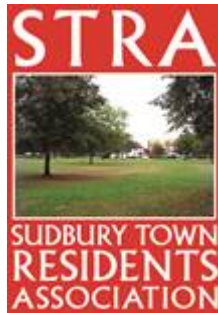
**From:** STRA Planning

**Sent:** 19 August 2021 14:10

**To:** Lewin, Paul



**Subject:** RE: Draft Local Plan Main Modifications Public Consultation ends 19 August 2021



Dear Mr. Paul Lewin,

Thank you for your reply.

Our understanding of the NPPF is that Strategic policies should encompass borough wide goals and aspirations, creating a vision on evidence-based needs. We do not find this to be the case in the Draft Local Plan.

We support the Inspectors' recommendations made at the Examination Hearings, which are noted in the document titled:

*Schedule of Main Modifications of Draft Brent Local Plan submitted for Examination in March 2020 document (ref: Core\_04d) page 2:*

*Modification number MMI*

*Chapter 2 Introduction*

*Paragraphs 2.14 – 2.17*

*Reason for Modification*

*Additional paragraph to clarify the Council's approach to making explicit the strategic and non-strategic policies within the Local Plan, as required by the Framework.*

The Council have amended paragraph 2.14 of the draft Local Plan, referencing NPPF Para 21. The amendment reads:

*The NPPF (paragraph 21) requires local planning authorities to make explicit which policies are strategic in the 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.*

Many Strategic policies listed in Appendix 6 Table 8.6.7 are detailed and do not meet the NPPF's direction to provide an overall strategy as noted in NPPF 2021 Para 20 below:

*Strategic policies should set out an **overall** strategy for the pattern, scale and design quality of places....*

NPPF 2021 Para 21 also supports this:

*....Strategic policies **should not extend to detailed matters** that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.*

The draft Local Plan presently includes many detailed matters as Strategic policies. The Council's approach remains unclear and additional wording does not provide justification.

For example:

- - Policy BH9 on page 300 – ‘*Gypsy and Traveller Accommodation*’ is a Strategic Policy. We support redressing housing shortages for all those who are in need, however, we do not understand why Policy BH9 is a Strategic policy and the Council have been unable to explain their approach.
- - Policy BT4 on page 377 – ‘*Forming an access on to a road*’ is a Strategic policy. We do not understand why Policy BT4 is a Strategic policy and the Council have been unable to explain their approach.

There are many other examples of detailed matters being listed as Strategic policies without justification.

The National Planning Policy Framework sets out the requirements for a plan to be found sound. It states a Plan must be: (a) positively prepared; (b) justified; (c) effective; and (d) consistent with national policy.

Strategic policies form the basis of all Local Plans and we consider that the changes to Para 2.14 do not meet the criteria of NPPF Paras 20 – 30. We remain unclear as to the approach the Council has used when identifying and differentiating between Strategic and non-Strategic policies and are concerned about the lack of justification.

Please note that in MM1, Para 2.14 Amendments, Table 1 in Appendix 6 is titled 8.6.7 and not Table 1. We are unable to locate Table 2. Please could you direct us to Table 2.

We also highlight the changes of the Statement of Community Involvement as another example of deviation from the NPPF as seen in the referencing below.

NPPF Para 25 states:

*Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. **They should engage with their local communities and relevant bodies....***

The non-Covid related changes to the Statement of Community Involvement without public consultation and its introduction in the late stages of the Draft Local Plan process we consider to be a significant deviation from the NPPF.

The NPPF guides policy makers to develop an on going effective engagement process to create strategic and non-strategic policies as shown below:

NPPF Para 26 states:

*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.*

NPPF Para 28 states:

*Non-strategic policies should be used by local authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development.*

NPPF Para 29 states:

*Neighbourhood planning gives communities the power to develop a shared vision for their area.*

The combination of the draft SCI 2021 and designation of non-Strategic policies as Strategic policies will effectively obstruct communities from shaping their own area.

This is also contrary to the London Plan 2021 Policy GG1 Building strong and inclusive communities, page 14:

*Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:*

*A encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies*

The draft SCI 2021 does not support engagement with local communities and deviates from the core intentions of the NPPF and London Plan 2021. The wording of each impacts the other, its application and impact on community involvement and neighbourhood planning.

The Strategic policies, non-Strategic policies and the Statement of Community Involvement are all intertwined.



All Local Plans aim to improve the quality of life of the people of an area. This Local Plan is intended to guide planning, growth and development in Brent for the next 20+ years. To rush through the review at this stage would be to the detriment of the people of Brent.

We would like an opportunity to review the information deemed to be of no material consideration, with fresh eyes and objectivity. We understand that sometimes working closely with documents is an arduous task and we appreciate your hard work.

We hope this provides some insight into our thoughts and encourages mutual understanding. We respectfully continue to seek a separate public consultation regarding the draft SCI 2021 to develop a collaborative framework for consultations and neighbourhood planning. We believe this will form a strong foundation for the people of Brent to shape their areas with a shared vision and meet local needs now and in the future.

We would again kindly request in the interest of fairness to all either a borough-wide extension or reschedule the Main Modifications Public Consultation to enable collation of other public consultation findings and review of additional documentation. This will enable all parties to provide constructive responses and feedback.

We look forward to your reply.

Kind regards,

STRA Planning



[REDACTED]

[REDACTED]

Independent

Intercultural

Impartial

On 19/08/2021 12:24 Lewin, Paul  
[REDACTED] wrote:

Dear STRA Planning

Thank you for your e-mail and associated attachments. The consultation is about proposed modifications to the Plan as a result of issues raised during the examination hearings. The strategic/ non-strategic policies are modifications that are part of the consultation. As such, the Council will welcome comments on these that specifically set out which policies STRA considers are strategic and non-strategic. The Council has set out its justification in supporting material which has been made available. STRA has the ability to justify its position on what are strategic and non-strategic taking account of the NPPF and other matters that it considers are material.

The up-date to the SCI specifically related to the Local Plan examination was to address the potential for Covid to require amendments to the standard consultation processes undertaken in relation to its next stages. This was to ensure that principally should restrictions be in place on people being able to access paper copies of consultation documents that the Council was undertaking consultation in accordance with the SCI. This and other changes to the SCI have no material bearing on the content of the Local Plan and the modifications that are subject to consultation.

On the other matters, the Council does not consider that they are material to the content of the draft Local Plan. You may disagree and highlight to the Inspectors other matters that you consider have emerged since the examination hearings that should be considered material to the content of the Plan either in the response to the modifications or separately. The Council is willing to discuss with STRA the other issues it identifies and where subject to consultation STRA will also be able to respond on the respective consultations. The Council however does not consider that these warrant an extension to the local plan modifications consultation deadline for STRA.

Regards

Paul Lewin

Team Leader Planning Policy

Regeneration & Environment

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We are working hard to maintain high standards of service delivery, but due to the impact of the Covid-19 virus, please be patient as there could be an impact on our ability to respond in the usual manner.

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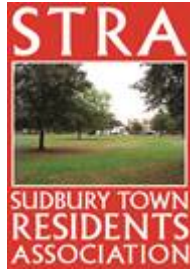
**From:** STRA Planning [REDACTED]

**Sent:** 18 August 2021 23:35

**To:** Lewin, Paul [REDACTED]

[REDACTED]

**Subject:** RE: Draft Local Plan Main Modifications  
Public Consultation ends 19 August 2021



Dear Mr. Paul Lewin,

Thank you for your detailed response today and yesterday.

The draft SCI 2021 contains significant changes that are non-Covid related. In particular, there are some changes to public consultations during the process from preparation to adoption of Local Plans, as well as the roles of Neighbourhood Forums and Neighbourhood Planning. We consider these non-Covid related amendments to be of material consideration to the Draft Local Plan.

This is further significant in light of many policies, which we consider to be non-Strategic listed as Strategic in Appendix 6, Table 8.6.7.

NPPF 2021 Para 20 states:

*Strategic policies should set out an overall strategy for the pattern, scale and design quality of places....*

NPPF 2021 Para 21 states:

*....Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.*

The draft Local Plan presently includes many detailed matters as Strategic policies and Neighbourhood Plans are required to be in line with Strategic Policies.

The combination of the draft SCI 2021 and designation of non-Strategic policies as Strategic policies prevents communities from shaping their own area and enhancing the special characteristics of their local parts.

We therefore kindly seek a separate public consultation regarding the draft SCI 2021 to develop a collaborative framework for consultations. The findings of this public consultation can be included in the Draft Local Plan Submission documents to help shape our borough.

Transport Infrastructural needs are vital and Strategic, especially in the context of Brent's high growth projections and important Industrial sites. Brent's Long term Transport Strategy 2015 – 2035 is relied upon as evidence throughout the Draft Local Plan. However, a revised Draft Local Plan is under review. We have downloaded the Forward Plan 36 of the Cabinet dated 14 May 2021 (copy attached). On the last page, it states:

*Brent Long Term Transport Strategy Review –  
Draft for Consultation*

*For Cabinet to*

*(i) approve the approach contained within the Draft Brent Long Term Transport Strategy for delivering improvement to the transport system in the borough*

*(ii) agree for the draft strategy to undergo a period of public consultation and wider stakeholder engagement during Autumn 2021*

*Expected date of Decision 16 August 2021*

The Cabinet decision appears to have been rescheduled and the public consultation delayed. We are keen to review this document in context of the Main Modifications.

Please could you provide STRA and the Inspectors a copy of the draft Brent Long Term Transport Strategy and let us know when the Public Consultation is likely to take place.

The current Article 4 Direction Public Consultation contains a number of matters that directly relate to the Draft Local Plan (copy of Consultation details attached). There is an Overview page in which you are noted as the person to contact regarding this Consultation (copy attached). This indicates that the Consultation is from 05 August to 19 September 2021. The findings of this relevant Public Consultation are of material consideration to the Draft Local Plan projections. Given its importance, we are keen to review these findings in order to constructively contribute.

We would again kindly request that the Public Consultation regarding the Main Modifications be rescheduled to enable review of the above

findings, with additional information and relevant documentation.

Thank you.

Kind regards,

STRA Planning

[REDACTED]

[REDACTED]

[REDACTED]

On 18/08/2021 16:09 Lewin,  
Paul [REDACTED]  
wrote:

Thank you for your comments. Notwithstanding these, we do not propose to amend the consultation deadline which we consider is appropriate for this stage of the Plan. As indicated, to do so at this late stage would be unfair to those that have met the deadline. The main modifications essentially reflect changes suggested necessary by the Inspectors for the Council

at the examination hearings, the majority of which STRA were in attendance.

We consider that the strategic and non-strategic policies have an appropriate level of justification set out for them. When making representations at the examination hearings on the strategic and non-strategic policies, STRA must have considered which policies in particular that it had issues with as being identified as strategic and the reasons why they weren't justified. It might be best to focus on them.

The consultation on Article 4s is separate and the Council has provided additional time on that consultation above the statutory minimum of 21 days to avoid it being in close proximity to the Local Plan consultation deadline. These Article 4s remove permitted development rights which otherwise due to the limited conditions required to be considered will not allow most Local Plan policies to be applied in determining acceptability of schemes relying on those rights. The confirmation of Article 4s if it is appropriate following consultation is likely to be dependent on input from the Secretary of State following recent changes to the NPPF. To date no timescale has been identified by MHCLG on when the Council is likely to get a response. As such, it is not clear when the Council will be in a position to understand if and when it can proceed with confirming the Article 4s, which given the date they are proposed to come into effect, could be up to a year away.

The draft Long Term Transport Plan is no longer going to Cabinet in September and is now lined up for Cabinet in October. The draft nature of the document, together with its associated consultation period



and the need to consider representations will mean that it will be a reasonable time before it is adopted. As set out in our previous e-mail, we do not consider that the contents of this document will materially impact on the contents of the draft Local Plan, as both documents have been written taking into account the proposed level of development for the borough set out in the draft Local Plan and the transportation priorities and associated solutions available to the Council as a result of the Mayor's transport strategy.

The outcome of the Planning White Paper is as yet unknown and its contents now appear highly speculative in light of recent ministerial comments. Notwithstanding any future change to the status of Local Plans and their relationship to planning permissions, there will be a period of transition where the draft Brent Local Plan if and when adopted will be in effect. It will be for future Local Plan updates to bring into effect the potential zoning approach identified in the White Paper, until that time the current relationship between Development Plan and applications will remain.

Overall, we consider that the biggest risk to effective planning in Brent is not having an up to date plan in place which prolonging the draft local plan adoption process will further contribute towards. We urge you to try to make comments on the main modifications as best as you can within the deadline.

Regards

Paul Lewin

Team Leader Planning Policy

Regeneration & Environment

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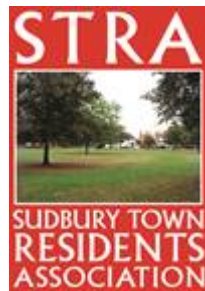
**From:** STRA Planning  
[REDACTED]

**Sent:** 18 August 2021 11:03

**To:** Lewin, Paul

[REDACTED]

**Subject:** RE: Draft Local Plan Main Modifications Public Consultation ends 19 August 2021



Dear Mr. Paul Lewin,

Thank you for your speedy response yesterday.

Yes, we received an email from the Secretary of State on 11 May 2021, pertaining to some additional works in relation to the Examination Hearings held in September / October 2020.

We are writing to you regarding a separate matter, the current Public Consultation that Brent Council is undergoing with the people of Brent.

We received notice of the Stage 3 Public Consultation on 07 July 2021. The significance in our minds of the current Public Consultation is that it is a culmination of the Draft Local Plan, Inspector's recommendations, additional supporting evidence, new document submissions and recently proposed Modifications to the Draft Local Plan.

The Main Modifications documents were only made available from 07 July 2021. The impact of the new evidence and documents requires assessment with the Modifications documents.

We recall that at the Examination Hearings the Inspectors highlighted that the Strategic Policies noted in Appendix 6 Table 8.6.7 may be far wider reaching than the NPPF directs and may be more appropriate within non-Strategic policies and Neighbourhood Plans. With this in mind, combined with proposed changes to the SCI 2017, additional documents,

outstanding information from currently open consultations ending 16 September and pending Cabinet decision on 13 September 2021, we kindly request that the current Public Consultation be reopened after this information is available to the Council and the public.

With the Council's clear direction, the public can then fully understand, assess and apply the evidence, justification, Strategic and non-Strategic policies proposed in the Draft Local Plan and provide meaningful and relevant consultation responses, that can help the Council to shape our Borough.

We are also mindful of the proposed changes in the planning system by Central Government, which may result in Communities being unable to respond to Planning Applications and only participate at Local Plan stages. It is therefore vital as a local community for us to help to shape our Borough.

Please could you kindly reconsider and let us know your decision.

Thank you.

Kind regards,

STRA Planning

[REDACTED]

[REDACTED]

[REDACTED]

Independent

*Intercultural*

On 17/08/2021  
16:08 Lewin, Paul

[REDACTED]  
[REDACTED] wrote:

Dear STRA

Further to the points below, the documents you highlight apart from the modifications were on the examination website from the 10<sup>th</sup> May 2021 and you were made aware of this by the programme officer in an e-mail sent on the 11<sup>th</sup> May 2021. This means you have had 14 weeks to date to consider their content.

Regards

Paul Lewin

Team Leader  
Planning Policy

Regeneration &  
Environment

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**From:** Lewin, Paul

**Sent:** 17 August  
2021 14:20

**To:** 'STRA Planning'

[REDACTED]

**Subject:** RE: Draft  
Local Plan Main

Modifications  
Public Consultation  
ends 19 August  
2021

Dear STRA  
Planning

Thank you for the comments provided and your request for an extension to the consultation deadline. We have considered this request and I am afraid given the late stage of this request that we will not be extending the deadline for STRA, or that of the wider consultation. This would be unfair on other participants who have already submitted responses.

The changes to the SCI are not material to the content of the draft Local Plan main modifications consultation, but highlight how consultation may be required to change on planning documents such as the Local Plan as a result of any Covid19 restrictions, should they be required, which looks increasingly unlikely. We will be willing to have a separate

discussion on the neighbourhood planning elements of the SCI if you wish although there is no statutory requirement for us to consult on a SCI. The content of the document does not go beyond current regulations/ planning practice guidance and the Council's neighbourhood planning protocol.

On the emerging Local Transport Plan, given the length of the Local Plan and its time for adoption it is inevitable that there are likely to be other long term strategies that are updated either prior to or post adoption. The Transportation Planning Manager has been involved closely in both the draft Local Plan and the Strategy. Both documents identify the level of Growth planned for the borough and the priority given in the Mayor's transportation strategy, which take forward promoting the move towards more sustainable forms of transport in the borough. It is not considered that the emerging Transport strategy will materially change



circumstances to such an extent that will significantly affect the content of the draft Local Plan. The infrastructure delivery plan has always been identified as a document that will be updated on an on-going basis and as such it has the ability to accommodate changes in infrastructure required.

On HMOs, the Council consulted on an Article 4 and as a result of representations received on this consultation did not introduce it as planned. The Council's Cabinet in October 2021 is likely to consider another Article 4 for HMOs that will apply to the borough but exclude growth areas. This will support Policy BH 7 that sets out limit an over-concentration of HMOs and loss of family housing. The current Article 4 direction consultations are not the same issue. They apply to restricting permitted development rights essentially related to changes of use from Use Class E to dwellings and redevelopment of employment

premises to  
dwellings.

Regards

Paul Lewin

Team Leader  
Planning Policy

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**From:** STRA  
Planning

[REDACTED]



**Subject:** Draft Local  
Plan Main  
Modifications  
Public Consultation  
ends 19 August  
2021



Dear Mr. Paul  
Lewin,

The Council  
consultation on  
the proposed main  
modifications to  
the draft Local  
Plan following the  
Examination  
hearings is due to  
come to an end on  
19 August 2021.

STRA  
participated  
throughout the  
Examination  
hearings and are  
very grateful for  
your  
understanding,  
facilitation and  
support through  
this process. We  
are keen to

continue to fully participate in the preparation of Brent's Local Plan.

To this end however we would like to ask for more time to respond to this latest round of consultations, given the broad extent of some of the changes proposed, the introduction of significant numbers of documents to the evidence base, and the interrelation between the Local Plan process and other deliberative processes that have (or are capable of having) an impact on the Local Plan.

On the first and second points, by way of example only there appear to have been the production of a series of new documents relevant to neighbourhood planning. This includes a significantly revised Statement of Community Involvement, going beyond

COVID-related amendments and setting out new material about neighbourhood planning, and also a document setting out new housing requirements for neighbourhood plan areas. Given the paucity of information about intensification corridors provided to the Examination, there is also now a justification document which requires considerable scrutiny,

On the third point, we note that the Council is currently deliberating on two matters which are capable of having a significant impact on the Local Plan.

First, a new Brent Long Term Transport Strategy is due to be reviewed by Cabinet on 13 September 2021. This is significant for the emerging Local Plan, as the Infrastructure Delivery Plan (October 2019) is reliant on the

existing Brent Long Term Transport Strategy 2015-2035. There is a necessary connection between these two policy processes therefore, and we are concerned that the emerging Local Plan and its Infrastructure Delivery Plan need to take into account the Council's proposed approach to transport infrastructure delivery throughout the plan period.

Second, the Council's approach to HMOs within Brent seems to be constantly changing. The Examination hearings proceeded on the basis that the Council would not seek to remove permitted development rights allowing the creation of small HMOs without planning permission. However the Council is now consulting on an Article 4 direction to do precisely this, in particular affecting SIL,

LSIS, Town  
Centres and Site  
Allocations in the  
Draft Local Plan  
as all being  
impacted by this  
decision. The  
outcome of this  
process is capable  
of affecting  
Brent's Industrial  
Land stock, town  
centre economy,  
site allocations  
and housing  
delivery.

STRA would  
therefore request  
an extension of 80  
days of this main  
modification  
period, in the first  
place to enable us  
to respond as  
constructively as  
possible to the  
main  
modifications  
proposed, but also  
to enable those  
consultation  
responses to take  
into account the  
Council's  
emerging policy  
position in other  
areas.

Kind regards,

STRA Planning

[Redacted signature]

[Redacted name]

[Redacted contact information]

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STRA Planning

[REDACTED]

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STRA Planning

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