



Brent Local Plan
Examination Stage Proposed
Modifications Representation Form

**Council
Reference
Number:**

27 a- o

Representations on the proposed modifications must be received by the Council by 5pm 19th August 2021.

All the representations should be submitted to planningstrategy@brent.gov.uk or Paul Lewin, Planning Policy Team Leader, Brent Civic Centre, Engineer's Way, Wembley, HA9 0FJ. Ideally provide your response in Word or similarly editable document formats. This will make it easier for us to summarise representations and speed up the process of reporting to the Inspectors.

Data Protection

The personal information you provide on this form will be processed in accordance with the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. It may be used by the Council, the Planning Inspectors or the Local Plan Programme Officer to contact you, if necessary, regarding your submission. All representations including all accompanying personal data will be sent to the appointed Planning Inspectors undertaking the Local Plan examination. Please see the [Council's planning](#) and [Planning Inspectorate's](#) privacy notices

Your name, organisation name (if relevant) and comments will be made available for public inspection when displaying and reporting the outcome of the consultation. No other personal data will be displayed. No anonymous representations will be accepted.

If you consent the Council will place your details on our Planning Policy consultation database and inform you of any next stages in the Local Plan adoption process.

I wish / ~~do not wish~~ to be informed of the next stages, such as publication of the Inspectors recommendations or the adoption of the Local Plan - **delete as appropriate.**

If you consent, the Council will also retain your details to inform you of any further planning policy consultations, such as any review of the Local Plan, Community Infrastructure Levy, Supplementary Planning Documents, Article 4 Directions, conservation area/ other heritage asset reviews and neighbourhood planning.

I wish / ~~do not wish~~ to be informed of other planning policy consultations - **delete as appropriate.**

Please sign and date this form. Forms signed electronically or with typeset will be accepted.

Declaration:

By completing and signing this form, I agree to the above use of data submitted in association with my representations.

Signature:	RPS on behalf of Wembley Towers Ltd	Date:	19.08.21
------------	-------------------------------------	-------	----------

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

**1. Personal
Details***

**2. Agent's Details (if
applicable)**

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wembley Towers Ltd"/>	<input type="text" value="RPS Consulting Services Ltd"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="20 Farringdon Street"/>
Line 2	<input type="text"/>	<input type="text" value="London"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="EC4A 4AB"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

(necessary to assist in communicating with you effectively and ensuring the examination process is not subject to delay)

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Wembley Towers Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM3**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Stonebridge Real Estate Development Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM5**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Stonebridge Real Estate Development Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM44**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	X
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Stonebridge Real Estate Development Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM45**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Stonebridge Real Estate Development Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM53**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Stonebridge Real Estate Development Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM94**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Stonebridge Real Estate Development Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM99**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Stonebridge Real Estate Development Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM101**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Stonebridge Real Estate Development Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM104**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation: **RPS on behalf of Stonebridge Real Estate Development Ltd**

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1 **MM106**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To allow a full explanation of our objection and discussion with the appointed Inspector and Local Planning Authority.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Guidance Note to Accompany Model Representation Form

1. Introduction

1.1. The Council has proposed modifications to the Brent Local Plan that it has been submitted for examination by the appointed Planning Inspectors. It is only the proposed modifications and associated documents that are subject to consultation. All previous representations received on the submitted Plan have been considered by the Inspectors as part of the examination process to date and do not need to be re-submitted, or additional points made on them. The *Planning and Compulsory Purchase Act 2004*, as amended, [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspectors will consider all representations on the plan that are made within specified consultation periods.

1.2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available and taken into account by the Inspector.

2. Legal Compliance and Duty to Co-operate

2.1. You should consider the following before making a representation on legal compliance:

- The plan should be included in the Council's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the Council proposes to bring forward for examination. If the plan is not in the current LDS it should not have been published for representations. The LDS should be on the Council's website and available at its main offices.
- The process of community involvement for the plan in question should be in general accordance with the Council's Statement of Community Involvement [SCI]. The SCI sets out the Council's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The Council is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The plan should be in general conformity with the London Plan (formally known as the Spatial Development Strategy).
- The plan should comply with all other relevant requirements of the PCPA and the *Town and Country Planning (Local Planning) (England) Regulations 2012*, as amended [the Regulations].

2.3. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the Council to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The Council will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

3. Soundness

3.1. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- **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 authorities 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 NPPF.

3.2. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy or the London Plan?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

4. General advice

4.1. If you wish to make a representation seeking a modification to a plan or part of a plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 3.1 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

4.2 You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You

should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

4.3. Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

4.4. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

Our ref: KJ/BB/23453

Date: 18 August 2021

Policy Team
Brent Civic Centre
Engineer's Way
Wembley
HA9 0FJ

20 Farringdon Street
London, EC4A 4AB
T +44 20 3691 0500

By email: planningstrategy@brent.gov.uk

Dear Sir / Madam

REPRESENTATION TO BRENT LOCAL PLAN: CONSULTATION ON PROPOSED MAIN MODIFICATIONS

We act on behalf of our client Wembley Towers Ltd, owners of the Wembley Point site located off Harrow Road. Wembley Towers Ltd is seeking to develop Strategic Site Allocation BSSA6 (Argenta House & Wembley Point). We have been instructed to submit the following representation to the Main Modifications Publication Stage consultation. You will also be aware that Wembley Towers Ltd has been active in the formulation of the Plan to date having commented on the Regulation 18 Consultation in November 2018, and the Regulation 19 Consultation in December 2019. They welcome the opportunity to continue to influence the Plan and to work in partnership to facilitate the regeneration of the area.

We set out our comments below against the relevant thematic sections, specific Site Allocations and detailed policies. In our comments we indicate recommended modifications to ensure the Plan's soundness.

MM3 - Chapter 4: Development Vision and Good Growth in Brent

We support the principle of 'good growth' set out within this section and note that development is to make the best use of land by prioritising development in accessible locations and deliver efficiently and intensively in Growth Areas. We also note that the strategy supports higher density development in Brent's town centres and in areas with good accessibility to public transport.

We would recommend that it should be made clearer that opportunities for growth can also be derived from an objective of overall regeneration, particularly where there are several large-scale sites that cumulatively will make a substantial positive impact in an area through effective planning and maximising opportunities through appropriate land use and scale. Such an area is focussed on Stonebridge Park where, for example, a strategic planning application has been approved at Northfields and where other draft Site Allocations such as Argenta & Wembley Point could lead to a substantial overall beneficial improvement of the local area, delivering the 'good growth' sought. The opportunity and focus for increased densities and substantial transformative change should be emphasised in these types of locations.

Proposed Modifications: It is recommended that a further criterion 'Regeneration Opportunities' is added under the heading 'Making the Best Use of Land' (Para 4.1) emphasising the opportunities and support for regeneration within the Growth Areas and Town Centres. This will ensure soundness through compliance with the requirements of National Planning Policy Framework (NPPF) paragraph 124 which seeks to achieve appropriate densities and that planning policies and decisions should support development that makes efficient use of land, taking into account various factors including promoting regeneration and change (Part d).

MM5 - Policy DMP1: Development Management General Policy

We are generally supportive of this policy but recommend that modifications are made to ensure soundness.

Proposed Modifications: It is recommended that Policy DMP1 is amended to include an additional criterion as follows:

'prioritises locations or areas that are well served by public transport'.

This will ensure consistency with national policy in the context of NPPF paragraph 125 which states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, especially in accessible locations, and ensure that developments make optimal use of the potential of each site. NPPF paragraph 125 also states that in these circumstances criterion a) requires that plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible, and that this should include the use of minimum density standards for city and town centres and other locations that are well served by public transport.

MM44 - Section 5.5: South Place

We note the reference to Wembley Point, Bridge Park Leisure Centre and the Unisys Building at Stonebridge Park currently presenting an unattractive gateway into the borough (Table at Para 5.5.9). This is an important reference given there are a number of sites within close proximity to Stonebridge Park station that have the scope (either individually or cumulatively) to make a dramatic transformational change to the townscape – through high quality design and enhanced permeability – and via optimised housing delivery through providing taller buildings, particularly to offset the negative aspects of the North Circular and to respond to the strong urban frontage.

MM45 - Policy BP5: South

We are supportive of this policy. Whilst we note the requirement in criterion b) to positively respond to the low-rise character of the area, enhancing the local setting and having a comfortable relationship with adjacent areas, while providing a dense development pattern; criterion c) provides an opportunity for taller buildings near Wembley Point. This will be subject to buildings being of the highest design quality and enhancing the local setting. This approach is supported, and it is noted that there is no reference to the specific height of the taller buildings. This is logical given that Wembley Point already provides a marker of height in the local area. The height of the buildings will be dependent on the design quality, technical considerations and local context developed at application stage, albeit the site, alongside Argenta House is of sufficient size to create its own character and sense of place, whilst ensuring that the adjacent hinterland is successfully mediated with appropriate scaling and location of buildings.

The policy supporting text paragraph 5.5.14 refers to the existing 21 storey Wembley Point building and the 8 storey Unisys building and recognises that both buildings are located at an important gateway to the borough and highly visible from the North Circular road and by rail. It is also noted that the supporting text considers a cluster of taller buildings could be appropriate in this location, subject to the buildings being of high quality design which contributes to the sense of arrival to the borough successfully mediating between the taller elements and the surrounding low-rise. This is supported.

MM53 - Site Allocation Policy BSSA6: Argenta House & Wembley Point

Our client owns Wembley Point and the surrounding land. Argenta House is in separate ownership.

In respect of Argenta House, Planning Permission (ref. 18/4847) was granted on 18.08.2020, for the following development:

“Demolition of the existing two storey building (Use class B1) and redevelopment to provide a 24-storey building comprising 130 residential dwellings (37 x 1 bed, 75 x 2 bed and 18 x 3 bed) with associated car and cycle parking, provision for bin stores, landscaping, and ancillary works.”

The representation submitted for this site allocation is solely in relation to Wembley Point.

Prior Approval was granted (Council Ref: 18/3125) for the change of use from office (Use Class B1) to residential (Use Class C3) involving the creation of 439 residential units, provision of 46 car parking spaces and secure cycle storage at Wembley Point in December 2018. This consent has been implemented and the development will be completed in October 2021.

Our ref: KJ/BB/23453

Therefore, whilst an increase in the indicative capacity is welcomed, it is recommended that the site allocation is clarified to confirm the indicative capacity of the site over and above the 439 residential units approved as permitted development at Wembley Point and 130 residential units which Members have resolved to approve at the Argenta House site.

Detailed technical feasibility work is currently being undertaken to review the current site constraints, including flood risk. In the context that the allocation considers that this area is suitable for tall buildings, subject to satisfactorily resolving and mitigating constraints and further feasibility work, there is an opportunity to bring about enhanced place-making to significantly increase the capacity of the site.

Proposed Modifications: It is recommended that the allocation's indicative capacity is significantly increased to 1,150 to reflect its capacity over and above the consented residential units to be provided at Wembley Point and the scheme which benefits from a Member resolution to approve at Argenta House.

The continued allocation of the site and modifications to the allocated uses is supported.

The site allocation states the *'majority of the site is within Flood Zone 3 including extensive flood zone 3b (functional floodplain)'*. It further states any changes to the functional flood plain boundary will need to be agreed by the Environment Agency. Given that the Environment Agency has already confirmed that the site is outside of Flood Zone 3b and entirely within Flood Zone 3a, this inaccurately represents the current situation and is unnecessary.

Proposed Modifications: It is therefore recommended that text within the Planning Considerations section is modified as follows:

~~"Wembley Brook and River Brent are potential sources of flooding and most of the site is within Flood Zone 3a". Part of the site is within including extensive flood zone 3b (functional floodplain). Development, other than water compatible uses, will not be acceptable within functional floodplain. Any flood modelling from applicants which seeks to justify a revision to the functional floodplain boundary will need to be agreed by the Environment Agency."~~

It is accepted that due to the site's location within Flood Zone 3 that a Flood Risk Assessment and Drainage Strategy will be required to support any redevelopment proposals. However, the inclusion of the requirement for development proposals to be *'consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'*, is not supported.

The Brent Strategic Flood Risk Assessment Level 2 states:

"The site currently has risk associated with fluvial flooding being with the exception of one small part wholly within Zone 3, with a large proportion identified through current modelling as functional floodplain (3b). No development should take place within what is identified as functional floodplain."

The inclusion of this recommendation wholly undermines the development aspirations set out within the Strategic Site Allocation. It is also inconsistent with the Environment Agency which has agreed to the removal of the site from Flood Zone 3b.

Proposed Modifications: It is therefore recommended that text within the Planning Considerations section is modified as follows:

"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.~~"

It is noted that the site is referred to as being in light industrial use. It is recommended that this use is solely attached to Argenta House given this is the only light industrial use within the allocation site boundary. In this context, the requirement for the re-provision of employment floorspace relates specifically to Argenta House

Our ref: KJ/BB/23453

and clarification is therefore required that this land use mix is only relevant to the redevelopment of this building. The remaining site allocation (including the Wembley Point Building) does not have any land use restrictions.

It is noted that the allocated use refers to the residential and affordable workspace uses. Again, affordable workspace provision (defined in Policy BE1 as minimum of 10% of total floorspace within major developments exceeding 3,000 sqm) should only apply to Argenta House given this is within a Local Employment Site. However, it should be recognised that given the potential for regeneration of the site, that there should be a mixture of appropriate uses as now included within the allocated use. These uses are likely to be located on the ground floor, due to flood risk and the need to activate the site and draw people through as a permeable route from Harrow Road to the station.

The removal of the requirement to provide affordable workspace on site to offset the loss of employment floorspace is supported. But the policy is still considered to be too prescriptive. It is not for the Council to determine a specific type/ model of employment use (such as affordable workspace), it should instead encourage the development of employment uses (which may include affordable workspace) in accordance with paragraph 20 of the NPPF.

Proposed Modifications: It is therefore recommended that text within the Planning Considerations section is modified as follows:

“The site was until recently predominantly in employment use. As such employment uses, including provision of some affordable workspace, will be encouraged sought on-site, as part of the potential uses associated with a new mixed-use community.”

It is noted that the allocation includes that the site is of sufficient size to accommodate BH3 Built to Rent and BH8 Specialist Older People’s Housing policy requirements. It is considered that the wording should be clarified to indicate that the provision of Build to Rent and Specialist Older People’s Housing is encouraged on the site, subject to a detailed feasibility assessment, but not mandated. This clarification is necessary to ensure that the policy is sound and consistent with national policy. Separate comments are provided below in respect of Policy BH3: Build to Rent.

Proposed Modifications: It is recommended that text within the Planning Considerations section is modified as follows:

‘The site is of sufficient size to consider the incorporation of BH3 Build to Rent and BH8 Specialist Older People’s Housing policy requirements, subject to a detailed feasibility assessment’.

The Design Principles modifications are mostly supported, but the requirement for any future development to mediate between the Wembley Point building and Unisys buildings places an unnecessary constraint on any future development of the site. It is not considered that the existing heights of these buildings should provide the basis for any constraints on height. It is acknowledged that development proposals should be proportionate in scale to these buildings, but the requirement to mediate, in scale and layout between them imposes an arbitrary height restriction across the site allocation.

This requirement would undermine the purpose of the Tall Buildings Zone that the site is identified as being within. In line with the Tall Buildings Policy, this Site Allocation Policy should provide the necessary flexibility to deliver a high-quality place making, including the siting of tall buildings across the site (subject to detailed planning considerations).

Proposed Modifications: It is therefore recommended that text within the Design Principles section is modified as follows:

~~*“Development must mediate, in scale and layout, between the cluster of taller buildings including the 7 storey Unisys buildings and 21 storey Wembley Point building, and the two storey housing to the north, and mitigate any potential impacts.”*~~

~~*“The site is within a Tall Buildings Zone and is suitable for tall buildings, subject to achieving development integration.”*~~

Our ref: KJ/BB/23453

The site is within a Tall Buildings Zone and is suitable for tall building, subject to integrating with the existing cluster of tall buildings, the two storey housing to the north and mitigating any potential impacts.

The development of the site is likely to generate a demand for community and cultural uses which could be accommodated as part of the mix of uses on site. But the modified requirement to provide these ‘as part of any development’ is unnecessarily restrictive and does not provide the inherent flexibility required to successfully develop this site allocation. Community and cultural uses should be sought as part of the broader mix of uses on site, but the policy should be updated to recognise that the site allocation may be delivered in stages.

Proposed Modifications: It is therefore recommended that text within the Justification section is modified as follows:

“Community and cultural facilities will be supported on site ~~required as part of any development~~, to meet need and create opportunities for social interaction and integration.

MM94 - Policy BD2: Tall Buildings in Brent

We are generally supportive of this policy and identification of Site Allocation BSSA6 within a Tall Building Zone on the proposed Local Plan Policies Map.

Policy BD2 states that Tall Building Zones heights should be consistent with the general building heights stepping down towards the Zone’s edge. Although Site Allocation BSSA6 has some individual site constraints, such as flood risk, there is a significant opportunity to deliver high-quality place-making, including an increase in density and height. As a result, there is likely to be significant scope to secure maximum height parameters within the site as part of any future development proposals.

Proposed Modifications: It is recommended that text within BD2 is updated as follows to ensure it is sound and consistent with other policies and site allocations in the plan:

“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 and intensification corridors.”

MM99 - Policy BH3: Build to Rent

This policy is restrictive and *ultra vires*. Although a Development Plan can support various housing models, it cannot dictate a type of model and preclude others. This would instead be a matter for the market to decide. Therefore, whilst the support of Build to Rent is welcomed, a policy which demands that within Growth Areas (excluding South Kilburn) or on development sites of 500 dwellings or more, the provision of Build to Rent would be expected is unsuitable as a policy. This is especially the case for this site given the significant supply of Built to Rent properties that have been consent in proximity as part of the regeneration of Wembley.

The policy is unsound and inconsistent with national policy in the context of Planning Policy Guidance (Paragraph: 001 Reference ID: 60-001-20180913) which advises that authorities should include a plan policy setting out their approach to promoting and accommodating Build to Rent. This should recognise the circumstances and locations where build to rent developments will be encouraged (our emphasis), for example as part of large sites and/or a town-centre regeneration area.

In addition, the policy should acknowledge other forms of residential accommodation which can add to the housing stock and meet local demand, such as the potential provision of co-living accommodation.

Proposed Modifications: It is recommended that the first paragraph of Policy BH3 is revised as follows:

“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~~ encouraged unless this would...”

Our ref: KJ/BB/23453

As set out above, it is suggested that Policy BSSA7 is modified to indicate that the provision of Build to Rent is encouraged on the site, subject to a detailed feasibility assessment, but not mandated.

MM101 - Policy BH5: Affordable Housing

This policy needs to be updated to state clearly that a minimum provision of 35% affordable housing will be acceptable without the need for a viability appraisal.

The approach to Build to Rent as part of the affordable housing delivery is not set out in this policy. The London Plan recognises that boroughs will need to determine if there should be a greater number of affordable homes or fewer homes at a deeper discount. It also states that in order to follow the fast track route, developments should follow tenure split contained within London Plan H6. The policy should therefore be updated to clarify the proportion of Discount Market Rent (DMR) homes to be provided to benefit from the fast track route, having regard to the relationship between the level of discount required and the viability of achieving the relevant threshold level. This should also reflect NPPF 2021 which defines affordable housing provision for rent as 'at least 20% below local market rents (including service charges where applicable)'. This provision is suitable for those Build to Rent operators seeking to provide accommodation for key/essential workers in London such as those people employed in the public sector.

Proposed Modifications: To ensure soundness and that the policy is justified through compliance with the requirements of London Plan Policy H6, it is recommended that Policy BH5 is revised to set the affordable housing target at 35% and include the requirements to qualify for the fast-track approach without the need for a viability assessment.

It is also recommended that the policy is modified to clarify the Council's Build to Rent affordable component and relevant rental levels to take account of the fast-track route (considering the relationship between the level of discount required and the viability of achieving the relevant threshold level).

MM104 - Policy BH8 Specialist Older Persons Housing

It is noted that to support achieving the London Plan annual benchmark monitoring provision target of 230 dwellings per annum the council will require provision of specialist older people's accommodation in defined circumstances. 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. Elsewhere, the policy requires specialist older people on sites with a capacity of 500 or more dwellings.

As set out above, it is necessary to ensure the plan is sound to modify Policy BSSA6 to indicate that the provision of all types of Specialist Older Persons Housing is encouraged on the site (including market provision), subject to a detailed feasibility assessment, but not mandated.

MM106 - Policy BH13: Residential Amenity Space

This policy requires all new dwellings to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs, which is normally expected to be 20 sqm per flat and 50 sqm for family housing (including ground floor flats). The policy wording is considered particularly onerous and prescriptive particularly in the context that developments in built-up parts of London need instead to seek to optimise valuable internal amenity space, whilst developments may also provide, or be best suited to the provision of, communal amenity space or the utilisation of public amenity space in the area.

Although not set out within the policy itself, the supporting text (paragraph 6.2.100) states that 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. The supporting text goes on to state that 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.

Our ref: KJ/BB/23453

Proposed Modifications: to ensure soundness and the required flexibility set out within the policy supporting text, it is recommended that additional text is included within the Policy to set out to identify clearly the exceptions to provision of external private amenity space below the specified thresholds as follows:

“Where sufficient private amenity space cannot be achieved individually for each dwelling to meet the full requirement of the thresholds above, 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. The provision of amenity space will be considered flexibly where it can be shown that all reasonable options for provision have been considered and where it can be demonstrated that high quality communal space can be delivered to meet residents’ needs”

Conclusion & Recommendation

We trust the above representation to the Brent Local Plan: Consultation on Proposed Main Modifications will be fully taken into consideration by the Council.

We wish to be kept informed of the progress of the Local Plan. If you require any further information in the meantime, please do not hesitate to contact Jorge Nash (jorge.nash@rpsgroup.com) at this office. Otherwise please direct all correspondence to the aforementioned.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

[Redacted Title]

[Redacted Address]

for RPS Consulting Services Ltd

Encs.