

**Brent Local Plan**  
Examination Stage Proposed Modifications  
Representation Form

**Council Reference Number:**  
32a - c

**Representations on the proposed modifications must be received by the Council by 5pm 19<sup>th</sup> August 2021.**

All the representations should be submitted to [planningstrategy@brent.gov.uk](mailto: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:

[Redacted Signature]

Date:

19/08/21

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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.

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### Part A

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#### 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)	Northwick Park Partnership (NPP)	Sphere25
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
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)

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**Part B – Please use a separate sheet for each representation**

Name or Organisation:

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" 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 checked="" 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 attached 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 attached 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:

**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.

Paul Lewin  
Planning Policy Team Leader  
London Borough of Brent Council  
Brent Civic Centre  
Engineer's Way  
Wembley  
HA9 0FJ



19<sup>th</sup> August 2021

BY EMAIL

Dear Paul

## **Northwick Park Partnership's Representations**

### **Main Modifications proposed for the Emerging Brent Local Plan**

Sphere25 write to provide representations on behalf of our clients Network Homes, the University of Westminster, the London Borough of Brent and London North West University Healthcare NHS Trust, referred to hereafter as 'Northwick Park Partnership' or 'NPP'.

The NPP is a consortium of landowners who are seeking to bring forward the development proposed within the Local Plan allocation Policy Reference: BNWGA1A 'Northwick Park Growth Area'.

#### **Introduction and Overview**

The aspiration to deliver new homes and improved facilities is a longstanding ambition of the NPP. Working with Brent Council and through the One Public Estate (OPE) initiative it has been possible to secure funding for significant external funding for access improvements. In particular, road widening and junction works. Over £9 million of investment has been allocated through the Housing Infrastructure Fund (HIF) to help realise these ambitions.

The NPP is a non-legal entity which describes the four key landowners within the emerging Northwick Park Growth Area 'BNWGA1A'. The NPP has been working collaboratively over a number of years and are now seeking to bring part of BNWGA1A forward for future development, having submitted a masterplan outline planning application to the London Borough of Brent (the "Council") in February 2020 together with a suite of related applications.

The proposals for the site have been developed for the land bound by Northwick Park on its western and southern boundaries and as identified in Figure 1. The outline application seeks to create a comprehensive redevelopment which delivers affordable and market housing, student housing, new teaching and sports facilities, and improved road and pedestrian access to Northwick Hospital and its facilities.





Figure 1: Land relevant to the NPP and the emerging allocation BNWGA1A 'Northwick Park Growth Area'. (Source: PRP Architects)

Having reviewed the Main Modifications proposed for the emerging Local Plan, The NPP is supportive of the Council's strategic aims and policies, especially in relation to the promotion of sustainable development.

The Main Modifications continue to prioritise the majority of residential development in Growth Areas including Northwick Park.

Northwick Park is capable of making a significant contribution to Brent (and London's) housing supply. The NPP therefore welcomes the designation of Northwick Park as a "Growth Area" and look forward to working with the Council to deliver their aspirations. Indeed, a resolution to grant planning permission for both a detailed first phase of development (654 homes) and outline for 1,600 homes and 51,150m<sup>2</sup> of student facilities to help bring forward development.

With regards to the specific Northwick Park allocation, the NPP wishes to comment on the following proposed changes set out within the Main Modifications.

**MM40, 5.4 North West,**

*Amend part d) of 'Homes' of the policy to read:*

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

It is not understood why the allocation has been reduced in scale. For the avoidance of all possible doubt, the figures in the proposed applications only refer to part of the wider allocation

There is no reason or evidence base provided that justifies a reduction in the allocation at this late stage.

### MM41, BNWGA1A: Northwick Park Growth Area

*Insert new policy after para 5.4.43 to read:*

#### Policy BNWGA1A Northwick Park Growth Area

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

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

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

☑ A new flexible retail offer adjacent to Northwick Park station which will serve to meet local needs;

☑ A new nursery capable of meeting existing needs, and those arising from new development;

☑ A range of multi-purpose green spaces which seek to enhance the biodiversity of the surrounding area whilst providing new play space for children, including 2 new 0.2ha pocket parks;

☑ Improvements to site accessibility, prioritising funding toward the most sustainable modes of transport;

☑ On site combined heat and power centre which will provide a network for surrounding major development, including potentially those at Harrow-on-the-Hill;

☑ Enhancements to existing on-site infrastructure which serves the wider area and that of London.

5.4.44 The Northwick Park Growth Area is coming forward under the Governments One Public Estate (OPE) scheme, via the Northwick Park Partnership which includes all landowners, including the [redacted] Work Homes, National Health Service (HNS), and the University of Westminster. Together [redacted] the OPE scheme, the site will see the greater utilisation of land for residential development.

This will help support the further delivery of essential large scale on-site infrastructures, including those which support and enhance the hospital and university functions.

5.4.45 The site is well connected, being adjacent to a range of public transport facilities, achieving a peak PTAL rating of 6a to 2031. This includes immediate proximity to Northwick Park LUL which includes the Metropolitan line to central London, Watford and west London, and Kenton LUL (a 5 minute walk) which includes the Bakerloo and Overground lines. There are also a number of buses which pass through the site, providing access in and around the local residential areas and serve access to the hospital.

5.4.46 The site is also adjacent to a significant amount of green infrastructure, including Northwick Park Metropolitan Open Land, Ducker Pool, Northwick Park golf course, and Harrow School playing fields. These areas include a number of Sites of Importance for Nature Conservation (SINC) and provide the opportunity to enhance these areas for both nature and recreation harmoniously.

5.4.47 The site is within close proximity to Kenton town centre which will enable residents to meet their wider needs. The site is somewhat detached from this area and should therefore have on-site provision which will better enable occupants to meet their day-to-day needs using sustainable transport modes. The range of needs addressed on site will need to reflect the scale of development, and the types of residents (such as families and students), which are likely to occupy the site as a result of the housing delivered and its location.

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

## MM42, BNWGA1A: Northwick Park Growth Area

Amend parts of the policy to read:

### Allocated Use

Growth Area - the site has been allocated for Mixed used development, including a small amount of commercial floorspace and ~~Additional~~ residential development to enable upgrades/ refurbishment to the existing and retained Northwick Park Hospital and University of Westminster facilities. A replacement sports pavilion, small amount of commercial floorspace, and possibly new small-scale non-acute medical facilities to also be provided on site.

### Indicative Capacity

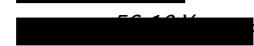
Capacity for circa ~~3,600~~ 1,920 units, of which ~~2,600~~ 1,585 net additional, development capacity will be better identified through a more detailed masterplan process.



Units for Delivery



10-15 Years: 650 218 (net 390)



50-100 Years: 1,950 (net 910) 1,702 (1,367 net)



The site is located off Watford Road close to the boundary with the London Borough of Harrow. It is formed of five main areas:

Northwick Park District Park, Northwick Park Hospital, Northwick Park Tube Station, Northwick Park Hospital Residential Accommodation and the University of Westminster. Within the site is a part of the one-way road system (also referred to as a 'ring road') that comes off of Watford Road, the main vehicular access for the site. Adjoining the northern boundary of the site is the Northwick Park underground station and tracks.

**The site consists of a mixed building stock of generally low quality, and is dominated by hospital buildings which range up to 8 storeys in height. The residential buildings on site provide accommodation for key workers and students.**

~~Northwick Park Station is a small, suburban station which has two platforms. The platforms are above the level of the surrounding area, and can be accessed by a flight of stairs from the ticket hall. The pedestrian connection from the station to Northwick Park is a requirement, through a narrow tunnel. Access to Northwick Avenue is relatively open from the ticket hall, past a small shop.~~

~~Northwick Park Hospital residential accommodation forms the eastern, and part of the southern part of the Growth Area. It consists of a number of affordable homes provided by Network Homes, some occupied by hospital employees. These are terrace homes and flats, predominantly 2 to 4 storeys. All housing is set back from the road behind either grass verges, hard landscaping or car parking spaces.~~

~~Northwick Park Hospital Campus consists of a number of buildings varying in height between two and eight storeys, mixed in quality and age. Large portions of the hospital campus are dedicated to at grade car parks. A multi-storey is located in the west. Northwick Park hospital provides a full range of services, which includes neurology, cardiology and elderly care medicine. It also has a 24/7 A&E service and Urgent Care Centre. It is one of the eight Hyper Acute Stroke Units within London. There are a number of trees located along the eastern boundary which provide a visual screen to Northwick Park.~~

~~University of Westminster comprises a number of buildings forming the western part of the Growth Area. Between these there are some areas of open/communal space. Halls of residence are located within its northern part with an associated green space, not currently publicly accessible. This green space has a variation in site levels and a number of trees. Trees line the southern boundary of the university site, acting as a visual break between it and the Northwick Park Hospital.~~

~~Northwick Park sports pavilion provides changing rooms and facilities to support recreation on the park. The facility is tired, needing significant investment to enhance its quality to allow the sports pitches to be used to their potential.~~

### Ownership

The London Borough of Brent, London North West University Healthcare NHS Trust, the University of Westminster and Network Homes are the key landowners, who come together to form the Northwick Park Partnership which will develop the site under the They have committed to work in partnership through a memorandum of understanding to promote the redevelopment of land at Northwick Park in a comprehensive manner through jointworking as part of the One Public Estate programme. It is also the responsibility of the London Borough of Brent to provide the land for London own Northwick Park station and adjacent railway land.

### Relevant Planning History

~~There have been numerous applications for the hospital site including new buildings, extensions, creation of multi-storey car park, ancillary services/infrastructure and facilities to support the functioning of the hospital.~~

Applications for redevelopment of the site under the Northwick Park Partnership include:

Permission (19/4272) has been granted for the 'Erection of a multi-storey car park on 5 levels for staff only, a separate plant/energy facility and associated works to access road at Northwick Park Hospital'

Permission (20/0677) has been granted for 'Full planning permission for junction improvement works to the A404 (Watford Road), and the widening of the existing Northwick Park Hospital spine road to allow two-way traffic; pedestrian and cycle improvements and associated landscaping and public realm works, and associated changes to access, and subject to a Deed of Agreement dated 4 December 2020 under Section 106 of the Town and Country Planning Act 1990, as amended'

Permission (20/0701) has been granted for 'Full planning permission for demolition of existing buildings and structures on the site, all site preparation works for a residential led mixed-use development comprising 654 new homes, associated car and cycle spaces, a replacement nursery, retail space, associated highways improvements, open space, hard and soft landscaping and public realm works.'

*PTAL Rating*

*2-5 (current), 2-6a (2031 estimate)*

As with the wider housing distribution - It is not understood why the site specific allocation has been reduced in scale. For the avoidance of all possible doubt, the figures in the proposed applications only refer to part of the wider allocation. Furthermore, the number of student homes was purposefully stated in floorspace rather than homes, and in outline.

There is no reason or evidence base provided that justifies a reduction in the allocation at this late stage.

Whilst clearly intended to be a helpful cross reference for a reader, the amended policy should not refer to specific planning applications and reference numbers. Indeed, the road application cited has already been superseded by planning application reference (21/2714)

*Tall Buildings*

The NPP strongly supports the Council's view that BNWGA1A is suitable for tall buildings on the site, subject to proposals being sensitively designed. Additionally, The NPP agrees that the design of the scheme should be conceived utilising a masterplan approach, with new buildings responding to the existing Northwick Hospital buildings in terms of scale.

The wording of the policy should therefore allow for a masterplan approach to determine the best use of the site and therefore we would suggest the following wording:

*[Redacted] for tall buildings, subject to being a high quality design. These should respond to [Redacted] existing hospital buildings, stepping down towards the MOL and areas to the north. Consideration should also be given to impact on the locally protected views as identified in the [Redacted] Harrow Local Plan. The appropriate height, extent and location of buildings will be identified within a masterplan for the site.*

## Figure 20 High Level Plan of the Place

NPP requests that the Northwick Park Growth Area BNWGA1A is identified on Figure 20 ‘High Level Plan of the Place’. The minor amendment will make its location is easily identifiable to those interpreting the emerging Local Plan.

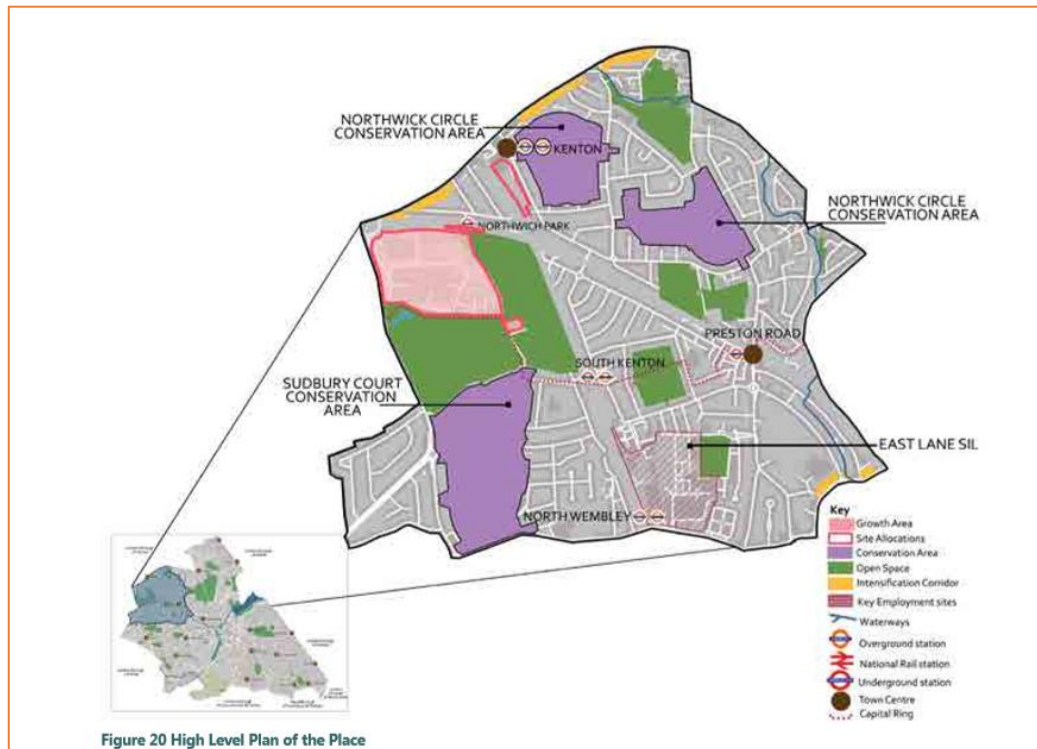


Figure 2: Extract from Regulation 19 draft of Brent Local Plan – Figure 20 ‘High Level Plan of the Place

This is supported.

### Conclusion

In summary, Northwick Park Partnership welcomes the continued commitment to Northwick Park within the emerging Local Plan. We look forward to receiving confirmation of receipt of these representations and request to be kept informed on progress of the next stages of the plan process.

Should you require further information at this stage please do not hesitate to contact me on the number below.

Yours Sincerely

[Redacted signature block containing several lines of blacked-out text]