

Brent Local Plan Main Modifications Consultation 8th July – 20th August 2021: Summary of representations received and Council response

SUMMARY OF REPRESENTATIONS RECEIVED, COUNCIL RESPONSES AND SUGGESTED FURTHER MODIFICATIONS TO THE DRAFT LOCAL PLAN – PRINT FORMAT A3 SIZE FOR THIS DOCUMENT
PLANNING POLICY TEAM

This document includes all representations received on proposed Main Modifications to make the Brent Local Plan sound, in accordance with paragraph 35 of the National Planning Policy Framework (NPPF). The representations have been summarised and responded to by the Council, with suggested modifications for the Inspectors where appropriate. This consultation ran from 8th July to 19th August 2021.

Formatting explainer: Throughout the document, in the proposed changes column, the proposed Modifications are generally expressed in the form of strikethrough for deletions of text and underlined for additions of text.

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Chapter 2 Introduction						
2 Introduction	MM1	MM130	Sudbury Town Residents Association (MMR_40)	<p>Strategic policies consistent with the NPPF should encompass borough wide goals and aspirations, creating a vision on evidence-based needs. This does not occur in the Draft Local Plan. The principle of the Inspectors' recommendations made at the Examination Hearings captured in MM1 is supported but not the associated detail. Many policies listed in revised Appendix 6 Table 8.6.7 are detailed and do not meet NPPF 2021 Para 20's focus on providing an 'overall strategy for the pattern, scale and design quality of places....'. They are contrary to para 21 by extending to detailed matters more appropriately dealt with through neighbourhood plans or non-strategic policies. Additional wording provided by the Council does not provide sufficient justification, e.g. Policy BH9. We support redressing housing shortages for all those in need, but do not understand why it is a strategic policy, the same is true of BT4. Many other examples exist. In MM1, a Table 1 in Appendix 6 is identified, this however in Appendix 6 is currently titled 8.6.7 and Table 2 is not included.</p> <p>NPPF Para 25 puts an emphasis on strategic policy-making authorities collaborating to identify relevant strategic matters to address in their plans and in doing so engagement with their local communities and relevant bodies. Para.26, 28 and 29 sets out the need for effective and on-going joint working between strategic policy-making authorities and relevant bodies, the use of strategic and non-strategic policies and the role of neighbourhood planning. The volume of strategic policies identified in the draft Plan, together with changes to the SCI will effectively obstruct communities from shaping their own area.</p>	<p>The NPPF definition of strategic and non-strategic policies provides the potential for a wide range of interpretation as was discussed at the examination hearings session on this issue, with examples being provided by Counsel appointed by the Council. The Council considers it has provided sufficient assessment against the NPPF as set out in Table 2 to be placed in Appendix 6 to justify the relative strategic/ non-strategic status of each. The balance is considered proportionate. The most recent adjacent whole borough Local Plan adopted by Westminster in 2021 Appendix 2 identifies that of 45 policies, only 9 contain a non-strategic element, and only one wholly is non-strategic.</p> <p>On Policy BH9, this is strategic in that it is making a commitment to seeking to address borough wide needs, this is consistent with the agreement made with other London Boroughs in that each seeks to meet its own needs for Gypsies and Travellers. With regards to collaboration and engagement as a strategic policy making authority the Council has complied with legal and NPPF requirements and has been consistent with the relevant adopted SCI. STRA have been given a fair opportunity to raise their points at the examination hearing and the Council extended an invitation at the session for STRA to set out which policies it considered to be strategic and non-strategic with justifications for the Council to consider when dealing with the Inspectors request for the Council to further consider justification of the strategic/non-strategic issue. Notwithstanding their position that more justification evidence is required, STRA have to date not provided a specific example of how potential neighbourhood planning policies in general, or more specifically for their area could be undermined by policies identified as strategic in the Local Plan. In any case any new neighbourhood plan would have to go through its own examination process in which the Council would be expected to set out an opinion on 'general conformity' of its provisions with strategic policies. On the basis of experience of neighbourhood planning to date in Brent, in the unlikely event that the Council could raise an objection on this basis, the forum would still be able as part of the examination process be able to set out the reasons for its departure from general conformity. The Plan examiner would be able to assess the relative positions, taking account of the</p>	<p>Amend MM130 to: "<u>Table 1:</u> Strategic Policies in the new Brent Local Plan for the purposes of Neighbourhood Planning....." Add after Table 1 contents: "<u>Table 2:</u> <u>Assessment of the Draft Brent Local Plan policies against the Strategic Policy Criteria in the NPPF.</u>" with the associated table 2 contents as set out in PHA_04 Action 5 document also added.</p>

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					locally specific circumstances and also the provisions of the NPPF and where appropriate consider the forum's policy justified. In relation to Table 1 and Table 2, it is agreed that MM130 does not adequately capture the information set out in MM1 for Appendix 6 and needs to be modified to do so.	
Chapter 3 Brent Characteristics						
3 Brent Characteristics	MM2		Sport England (MMR_17)	Reference to the Council's Indoor Sports and Leisure Needs Assessment and Playing Pitch Strategy is welcomed	Noted	No change
Chapter 4 Development Vision and Good Growth in Brent						
4 Development Vision and Good Growth in Brent	MM3		Canal and River Trust (MMR_1)	Support the modification: 'Enhancing the capacity of existing green and blue infrastructure such as Welsh Harp, the river Brent corridor and Grand Union Canal across a range of needs, including recreation, biodiversity and climate change.'	Support welcomed	No change.
4 Development Vision and Good Growth in Brent	MM3		Universities Superannuation Scheme (MMR_6)	The modification to 4a) is supported. It would benefit from inclusion of ".....release, where appropriate <u>and viable</u> and also..." to ensure decisions can reflect changes in the market.	The appropriateness sites identified for intensification and release in site allocations or Policy BE2 has taken account of its likely viability. Whilst it is accepted that there may be variability in full compliance when taking into account the whole range of policies that may apply to a development, there is no need to reiterate the viability issue continually throughout the Plan.	No change.
4 Development Vision and Good Growth in Brent	MM3		Resident (MMR_15)	Criterion 4d): The area already has a surplus of hotel accommodation. The pandemic has normalised virtual meetings. This will result in less demand for temporary business accommodation. No evidence is given for the need for this provision.Remove this criterion.	There is evidence of need as set out in the GLA Economics Apr 2017 publication: 'Projections of demand and supply for visitor accommodation in London to 2050'. This sets out a significant additional room requirement for the borough, principally to be delivered in Wembley and to a lesser extent Kilburn as priority locations.	No change.
4 Development Vision and Good Growth in Brent	MM3		Sport England (MMR_17)	Support the Council ensuring a sufficient supply of indoor and outdoor sports provision to meet demand. This aligns with Sport England's Planning Policy.	Noted	No change
4 Development Vision and Good Growth in Brent	MM3		Sudbury Court Residents Assoc (MMR_21)	Objectives 2 where housing will be on 'Intensification corridors' and 6, setting housing targets beyond of the London Plan minimum of 23,250 are unsound. Our borough is already congested with excess traffic and pollution. With the climate crisis, planning for housing exceeding the London Plan minimum will be unsustainable. Building high density, high rise housing will not provide good quality, attractive housing. These mistakes made in the past must not be repeated. Proposed modifications: 2b) "Supporting higher density development in Brent's town centres, Intensification Corridors and in areas with good accessibility to public transport," 6a) "Housing delivery will be maximised, with sufficient planning permissions to	In order to be compliant with London Plan and national planning policy, the Council has to identify the ability to more than meet the London Plan minimum. A minimum 5% buffer is required, but if the Council fails the housing delivery test a 20% buffer is required. To prevent unwanted consequences of the presumption in favour of sustainable development occurring better outcomes will come for residents and businesses in Brent if the Plan identifies more than sufficient sites to meet the minimum housing requirement.	No change.

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				support delivery of more homes than at the minimum London Plan housing target of 23,250 between 2019/20-2028/29....."	The intensification corridors are priority locations that are considered appropriate for higher intensity development and marginally greater height than exists currently. This will support the delivery of additional small sites housing capacity which is of increasing importance in seeking to be able to achieve the increased London Plan housing target.	
4 Development Vision and Good Growth in Brent	MM3		SAI Architects & Assoc (MMR_22)	Land is running short and we cannot build on any green land or belt in London and Brent which leaves only available option of brownfield sites. Use CPO and change design rules to accommodate needs by: 1) Going high density and high rise. 2) Prioritising bicycles (Brent Cycling scheme), in the stadium area from all nearby underground stations, Alperton, Sudbury, Preston Road, Neasden stations etc. to encourage more pedestrian/cycle movements rather than vehicles. 3) CPO all warehouses unused for more than 5 years. Encourage more multi-use with social and economics as the design tool for sustainable use and period. 4) Keep planning flexible to allow for change of use.	It is agreed that options for greenfield land development in Brent are very limited and that brownfield development will constitute the majority of the borough's opportunities for development. 1) The Council is encouraging more intensive use of land within appropriate locations such as growth areas, town centres, intensification corridors and areas with higher public transport accessibility. 2) These areas are essentially regarded as being acceptable for car free development which will prioritise residents walking and cycling to get to destinations. 3) It is extremely unlikely that any warehouses are vacant for so long these days. There is a shortage of industrial floorspace, with vacancy levels at historic lows of under 5%. 4) The Council is flexible in its approach on the majority of sites and where a developer can show the existing use is unviable, or the site could be used more effectively for something else will generally be supportive of such change.	No change.
4 Development Vision and Good Growth in Brent	MM3		TfL Commercial (MMR_25)	Support amendment to part 4a of the development vision and good growth section. This helps provide clarity on co-location and industrial land release.	Support welcomed.	No change.
4 Development Vision and Good Growth in Brent	MM3		Wembley Towers (MMR_27)	Support principles of Good Growth. Recommend including specific reference to an objective of regeneration, particularly when several large scale sites come together, such as is happening at Stonebridge Park. This should emphasise the opportunity for increased densities through transformative change.	The vision references the role of regeneration of Brent, whilst 1a) focuses on the opportunities at Stonebridge. The opportunities for South Place identifies the potential to improve Stonebridge Park gateway through redevelopment of the Argenta House/Wembley Point site. This together with the site allocation and identification as a Tall Buildings Zone provides sufficient policy support for a transformational change of this site/area.	No change.
4 Development Vision and Good Growth in Brent	MM5		Wembley Towers (MMR_27)	Support, however, to make sound should include new criterion as below: 'prioritises locations or areas that are well served by public transport' . This will ensure compliance with NPPF paragraph 125 which requires optimise land for development in well connected locations. Criterion a) of this paragraph makes clear that this should be reflected in Development Plans.	This comment essentially goes beyond the scope of the main modification proposed to this policy and would have been more appropriate at Reg 19 stage, whilst the policy itself focuses on developments essentially meeting minimum standards to allow for acceptable development. The strategy of the Plan in prioritising the majority of development in growth areas, town centres and intensification corridors,	No change.

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					together with associated allocations essentially addresses this matter.	
4 Development Vision and Good Growth in Brent	MM3		Stonebridge Real Estate Development (MMR_29)	Support principles of Good Growth. Recommend including specific reference to an objective of regeneration, particularly when several large scale sites come together, such as is happening at Stonebridge Park. This should emphasise the opportunity for increased densities through transformative change.	The vision references the role of regeneration of Brent, whilst 1a) focuses on the opportunities at Stonebridge. The opportunities for South Place identifies the potential to improve Stonebridge Park gateway through redevelopment of the Argenta House/Wembley Point site. This together with the site allocation and Tall Buildings Zone designation provides sufficient policy support for a transformational change of this site/area.	No change.
4 Development Vision and Good Growth in Brent	MM3		Stonebridge Real Estate Development (MMR_29)	6c states that 25% of new homes are to be 3 bedrooms+. This conflicts with London Plan policy H10, part A6, which states that decision makers should have regard to the nature and location of the site, with developments in well connected locations having a higher proportion of 1 and 2 bed dwellings. Whilst for low cost rent the policy also fails, stating that boroughs should provide guidance on unit sizes to ensure housing meets the identified need. Therefore the target should only apply to low cost rent housing, which would align the policy with the London Plan in both respects. In addition, it should be noted that families can also be occupied by 2b4p units and that a proportion of these units should be included within the definition of new family housing.	The objective is not site specific, applying to the borough overall. It should be noted that the London Plan panel of Inspectors recommended amendment to policy H10 to move away from a specific focus on one and two bed dwellings as previously set out in the draft version of the London Plan to allow boroughs the ability to identify priorities for dwelling sizes to meet evidenced local needs. Policy BH6 deals with the potential to move away from the 25% on specific sites in a number of circumstances. The SHMA takes into account the potential of 2 bed properties to house families. The 3 bed need specifically relates to the characteristics of the families in need, whether in market or affordable housing and Government's housing standards of when it is appropriate for children of different ages and sexes to share rooms. This together with optimising dwelling sizes for households' gives the minimum sizes of homes required.	No change.
4 Development Vision and Good Growth in Brent	MM5		Stonebridge Real Estate Development (MMR_29)	Support, however, to make sound should include new criterion as below: 'prioritises locations or areas that are well served by public transport' . This will ensure compliance with NPPF paragraph 125 which requires optimise land for development in well connected locations. Criterion a) of this paragraph makes clear that this should be reflected in Development Plans.	This comment essentially goes beyond the scope of the main modification proposed to this policy and would have been more appropriate at Reg 19 stage, whilst the policy itself focuses on developments essentially meeting minimum standards to allow for acceptable development. The strategy of the Plan in prioritising the majority of development in growth areas, town centres and intensification corridors, together with associated allocations essentially addresses this matter.	No change.
4 Development Vision and Good Growth in Brent	MM3		Resident (MMR_31)	part 6a of the Good Growth objectives identifies an unsound number of homes to be delivered. This figure cannot be met without being in breach of other policies within this Plan. This negligence of policy is current and ongoing. Examples include granting of permission of a 26 storey development on the Minavil House site in 2017 despite the Area Action Plan stating a max of 17 storeys. The Action Plan being quietly revoked due to such examples. Many new homes are to be delivered in areas of existing open space deficiency, yet these are unlikely to deliver new open space. Those delivered, particularly in taller buildings, have limited private amenity space, such as those approved for the Ujima House site where three bed homes have 7.5sq.m. balconies when recommended is 50sq.m. This is identified as acceptable as there is a park only 500m away. This park has	The homes target is considered justified and in accordance with London Plan and NPPF requirements. The Council is faced with a challenging housing target which has to be balanced against other policy requirements and priorities for the borough. The limited availability of sites to develop means that in the context of significantly higher housing requirements within the London compared to the 2010 Core Strategy and when the Alperton SPD was written, where there are limited impediments to doing so, the Council must consider	No change.

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				already been used for such justification, despite already serving a large population. It is accepted that more homes are needed, however, these should be genuinely affordable, not for sale/ rent at unaffordable sums.	schemes that promote the best use of land, which includes taller buildings. It is agreed that options for open space on smaller individual sites are more limited, but developments such as Wembley Park and Northfields show that where larger sites are developed there can be some reasonable sized public open spaces provided where currently there are none. The private amenity space standards for Brent are higher than those of the London Plan. The Ujima House site also has shared communal amenity space which is additional to that provided in private balconies. It should be noted that despite its town centre location, these new homes will provide more and a better quality of outdoor space than dwellings that have historically been built along the High Road. King Edward Park is an extensive high quality open space with a wide range of amenities. Development has and will continue to contribute towards its improvement. The Council can only control the cost of affordable homes and the percentages of affordable dwellings that it can seek through the planning system from third party developers is controlled by national policy and in particular ensuring viable development. Meaningful additions to affordable housing provision to properly address total needs can realistically only be dealt with through additional funding of either the Council's or registered providers development programmes.	
4 Development Vision and Good Growth in Brent	MM3		Resident (MMR_31)	Part 2d on identifying areas for tall buildings. Many such areas identified for example in Wembley, were previously identified as inappropriate. Protection has long been granted to Brent's metroland heritage. Tall buildings development is likely to destroy, not complement this character. The sense of place created would maximise profits, but negatively impact upon 1,000's of residents health and well-being. To remedy this 6a should be amended to ' <u>no more homes that the minimum London Plan housing target</u> ', with part 2d being removed.	It is recognised that some areas previously identified as being sensitive to tall buildings have been identified as appropriate for tall buildings, and that a small number of areas as being inappropriate have also now been identified as appropriate. This reflects two circumstances. One is the need to provide for much increased housing targets as set out in the London Plan. The other is consideration of the impact of consents for areas identified as appropriate or sensitive to tall buildings which has changed the context of the townscape from when no tall buildings existed, and as such has influenced which sites are now considered appropriate. The Council has sought to limit extensive change for the majority of Brent's suburban character by focussing the most development in a more limited number of areas. Notwithstanding Brent's character, policies within the London Plan limit the weight that can be attached to areas that do not have any elevated heritage protection status. It is expected given their relatively low density that the character of outer London suburbs will change overtime to meet the housing challenge. Reducing heights means that more areas for development would be required,	No change.

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					<p>which ultimately would result in physical change to the character of wider areas. To meet minimum housing requirements, the Council realistically has to identify significantly more capacity to ensure that there is a reasonable prospect of the target being met. This is because sites are often subject to unforeseen delays. Whilst it might not be appreciated by those who feel too much housing is being provided, such a strategy will actually result in better outcomes for the borough as the alternative is for the NPPF's presumption in favour of sustainable development to be enacted which could result in sites that ordinarily would not be considered appropriate for housing being brought forward by developers.</p>	
4 Development Vision and Good Growth in Brent			Brent Cycling Campaign (MMR_34)	<p>Given the urgency of the Climate break down it is surprising there is not more emphasis on the need to ensure more walking and cycling, or clear actions on how these modes are to be prioritised. This should be inherent to any long planning strategy to 2041. Changes are needed now with targets clearly spelt out in order to have the best future we can by then. The borough is already congested with excess traffic and pollution especially in areas that will benefit the most from regeneration projects. Planning must be in line with the latest London Plan and the latest Government guidance (Local Transport Note (LTN) 1/20) that came out following Covid. Gear Change clearly says: "We will ensure that all new housing and business developments are built around making sustainable travel, including cycling and walking, the first choice for journeys." This will not happen if sustainable transport infrastructure comes as an afterthought and if the council continues to put private motor traffic flow above everything else. Active travel must be embedded in planning. Government recognises that: "While many local plans already say the right things, they are not always followed consistently in planning decisions" and therefore Active Travel England will be a statutory stakeholder within the planning system. It would make sense for Brent to acknowledge this and be adequately prepared with an ambition matching the challenges ahead.</p>	<p>Noted. The Plan is positively prepared with regard to promoting active transport. Part 3b of the Good Growth Objectives states the following: 'Integrating physical activity back into the everyday lives of residents through promoting safe environments, active travel'. Again, given the cross cutting potential of active travel, it is further referenced under objective 5b as follows: 'Tackle congestion and air quality around the North Circular, improving orbital public transport routes such as the West London Orbital railway scheme and prioritising active travel to provide realistic alternatives to travelling by car.' These objectives are seen as a golden thread which run through the policies of the plan, and represent a strategic priority for the Council. This is specifically supported by policy BT1 which seeks to promote sustainable transport modes, including cycling. This references specific standards, such as London Plan and TfL cycling standards and Healthy Streets. It makes reference to the delivery of the Brent Cycling Strategy, which will be updated in accordance with these standards, and seek to deliver on the Plans strategic transport objectives, including that of the Mayors in seeking for 80% of trips to be undertaken by sustainable modes by the end of the Plan period. This is then further strengthened by other supporting policies, such as the individual Place policies which identify specific transport measures within certain parts of the borough which will help meet these strategic targets. This is in addition to other policies, such as policy BT2 which encourages a push approach to BT1's pull, and policy BSUI2 on air quality, which will seek to alleviate all forms of pollution, particularly that from transport which is the primary contributor of pollution within the borough. The approach to active transport and cycling will be considered holistically with the Brent</p>	No change.

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					Climate Emergency Strategy, and will be instrumental in helping the borough achieve its commitment to zero carbon by 2030. Together these policies and supporting strategies, and those within the London Plan, are considered to provide a strong basis upon which to help strive for sustainable and active transport within the borough.	
4 Development Vision and Good Growth in Brent	MM3		GLA/Mayor (MMR_37)	Note and welcome clear recognition of London Plan 2021 housing target 2019-2029 to deliver at least 23,250 new homes.	Noted	No change.
4 Development Vision and Good Growth in Brent	MM3		Sudbury Town Residents Association (MMR_40)	The Plan identifies growth to be delivered primarily within Growth Areas, and Intensification Corridors. Intensification Corridors are identified on parts of the primary road network, the same network which connects the Growth Areas. This will result in further congestion which the Council has not considered.	Noted. The Council is looking to deliver sustainable growth. To do this, it has identified the most sustainable areas within the borough which may accommodate this growth. This includes areas of high Public Transport Accessibility Levels (PTAL), such as within Growth Areas and Intensification Corridors. Part of the criteria in identifying Intensification Corridors explicitly excludes all areas outside of PTAL 3+. Policy BT2 of the Local Plan identifies that all development proposals should start with an aim to be car free. Development within PTAL 3-4 is likely to be considered appropriate for car free development, and as a minimum, will be car-lite in accordance with the maximum parking provisions identified in Appendix 3 of the Plan. Parking provision is considered a proxy for car dependency, and with suitable restrictions in place, serves as a measure to reduce this dependency within the borough. As such, the resulting development is not considered likely to significantly impact upon the road network, and in all likelihood, may result in fewer cars on the roads in these area than is already the case. Strategic modelling by TfL has raised no fundamental concerns with the amount and location of development proposed which would have resulted in them objecting to impacts on the strategic and main road network which are also principal bus routes. Indeed they have raised no objections to the general strategy of location and amount of development.	No change.
4 Development Vision and Good Growth in Brent	MM3		Sudbury Town Residents Association (MMR_40)	Raised concerns previously about the Article 4 Public Consultation open until 16 September. This public consultation is pertaining to dwellings, HMOs, SIL, LSIS and conversion from other class orders to dwellings. Housing data can be significantly impacted by the conclusions of this Article 4 direction Public Consultation. During the course of the Draft Local Plan, the Council's decisions regarding HMOs, SIL and LSIS has fluctuated. The findings of this Public Consultation should be included in the Draft Local Plan evidence and used to accurately project the number of new dwellings from different types and tenures of housing and conversions from other class orders.	The Article 4s seek to retain provisions of existing Article 4s in limiting change of use of offices and light industrial premises into dwellings that have been/will become redundant due to use class changes and amendments to permitted development. They also seek to remove wider rights introduced since the examination for wider changes of use for Class E in town centres and redevelopment of existing office and light industrial business premises. Without the Article 4s the impacts are likely to be mixed. It could result in additional dwellings through change of use,	No change.

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					but also some capacity could be lost for example from site allocations through piecemeal development as has occurred at the Liberty Centre site in Alperton. The Article 4 directions will also be subject to intensive scrutiny by the Secretary of State who to date has not commented. As such it is unclear what the outcomes will be in terms of housing outputs. Realistically it would take at least 5 years to understand the extent to which permitted development rights were leading to consistent changes in windfall site delivery that could be factored into a reliable assumption on capacity from this source. A reliable estimate could not be made now and therefore the windfall assumptions that have been tested through the London Plan examination are considered the most appropriate form of estimation. The Council will be taking forward a revised C3 dwellings to HMO article 4 based on consultation feedback previously received. This is likely to be made and consulted upon in later October 2021.	
4 Development Vision and Good Growth in Brent	MM3		Sudbury Town Residents Association (MMR_40)	The government reforms intent for Local Plans to form the framework for all planning decisions, with local input only being possible during the consultation of this document, and not at application stage. The Local Plan proposed modifications consultation is intended for amendments to the wording of the policies only, not for introduction of new strategies/ evidence. This now makes it permissible for every home to be sold, bought by compulsory purchase and demolished to building tall, blocks of flats. As such, and for this to be the only opportunity for Brent residents to help shape development within the borough for 25 years, it is considered that the Council start a new reg. 19 consultation whereby residents can have proper input. If however the Council wish to proceed, then STRA should be afforded 80 additional days to comment upon this consultation, enabling consideration of currently unavailable documents/ information (notably, the LTTS).	The proposals set out in the White Paper 2020 were highly speculative and it is not clear what outcomes will be. There appears to have been a significant shift in Government thinking on how radical the changes will now be. Notwithstanding what may emerge in terms of new legislation, there will be a transitional period which is likely to give increased weight to recently adopted Plans compared to ones over 5 years old, which if the Council did not proceed to adoption would leave Brent in a very vulnerable position. Ministers have urged Councils to not slow down progress on taking forward plans on the basis of waiting for new legislation.	No change.

Chapter 5 Places

5.1 Central Place

5.1 Central Place	MM21		Quintain (MMR_3)	MM21 leaves policy BCSA18 unsound as, although considered appropriate for cultural uses in supporting paragraph 5.1.33, D2 has been removed from allocated uses and not replaced in line with the new use class order. To rectify, 'Cultural and Leisure uses' should be included in the Allocated Uses section.	Given the town centre location and the former identification of the site for D2 uses, the inclusion of 'cultural and leisure uses' is considered appropriate.	Amend MM21 to: " A1-A4/B1/D1 and D2 uses. Retail/food and drink/ offices/ medical or health services/ crèche, nursery or day centre/ Learning and non-residential institutions/local community/ cultural and leisure uses. "
5.1 Central Place	MM15		Barratt London (MMR_4)	Welcome separation of site into BCSA7 and BCSA20. The indicative capacity of 456 homes is supported which is similar to application reference 20/0967 that has been supported by the Council. Planning history should be revised to: " No relevant planning history. 20/0967 - Resolution to grant planning permission – Demolition of existing buildings and structure and redevelopment of the site to	By their very nature plans become out of date quickly and there is the question of where to draw the line on policy modifications. In this case the resolution to grant is significant in indicating that the site, although subject to a call in, is progressing through the	Amend MM15 to: " No relevant planning history. 20/0967 - Resolution to grant planning permission – Demolition of existing buildings and structure and

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				<p><u>provide 454 residential units, 1,101sqm of replacement train crew accommodation and 115sqm of commercial floorspace across five buildings ranging from 13-21 storeys in height.</u>"Reflecting technical reports in support of application 20/0967 Planning considerations should be amended to: "There is a row of mature trees along the site boundary on Brook Avenue which ideally should be retained are of a limited quality. Development proposals should look to retain the existing trees but where this is not possible, compensatory tree planting should be provided that delivers a betterment on the existing, both in terms of tree quality and quantum."To reflect other site allocations within Tall Building Zones, it would be appropriate to add: "<u>The site falls within the Tall Building Zone as such it is suitable for tall buildings.</u>"</p>	<p>planning system, giving greater certainty of delivery. The changes to the trees reflect more up to date information so is considered appropriate for inclusion. Reference to the site being within a Tall Buildings Zone, consistent with other site allocations is considered appropriate.</p>	<p><u>redevelopment of the site to provide 454 residential units, 1,101sqm of replacement train crew accommodation and 115sqm of commercial floorspace across five buildings ranging from 13-21 storeys in height.</u>" There is a row of mature trees along the site boundary on Brook Avenue which ideally should be retained are of a limited quality. Development proposals should look to retain the existing trees but where this is not possible, compensatory tree planting should be provided that delivers a betterment on the existing, both in terms of tree quality and quantum....."and "....<u>The site falls within the Tall Building Zone as such it is suitable for tall buildings....</u>"</p>
5.1 Central Place	MM17		V Fund Ltd (MMR_5)	<p>The site owners have been in pre-application discussions and gained in principle support from the Council about the development of the site. The waste use on the site has focussed on processing of materials from the Neasden facilities based on operational convenience rather than necessity and can be transferred there so that no tonnage will be managed from this site.</p> <p>For clarity we request that where site allocations refer to residential it is clear that this is inclusive of non-self-contained accommodation for students and older people, etc. with modifications to:</p> <p>4.16 add: "<u>Places in the next chapter, this refers to self-contained and non self-contained accommodation (including accommodation for students and older people etc...)</u></p> <p>6.2.29 "<u>Wherever it can the Local Plan seeks to identify specific sites on which new homes will be delivered.</u> <u>Where 'residential' uses are identified for the Allocated Use of the specific sites set out in the Places chapter, this refers to both self-contained and non self-contained accommodation (including accommodation for students and older people etc...).</u> The spatial.."</p> <p>6.2.57 end add: "<u>Where 'residential' uses are identified for the allocated use of specific sites set out in the Places chapter, this relates to self-contained and non self-contained accommodation such as that identified in paragraph 6.2.57.</u>"</p> <p>Support the inclusion of the site within the Tall Buildings Zone and therefore its suitability for tall buildings.</p>	<p>The allocation policies when referring to residential are not prescribing a particular type of residential accommodation but provide the flexibility to allow the market to meet the most appropriate needs, subject to certain other policies within the Plan being met, e.g. BH3, BH5, BH6, BH7 and BH8. This could be clarified in supporting text prior to the Places chapters referring to detailed site policy as set out in paragraph 4.15.</p>	<p>Minor modification add to the end of paragraph 4.15 "<u>Residential capacity has been based on a standard residential dwelling mix however, where the allocated use is residential this does not necessarily mean that standard self-contained homes will be expected on the site. Subject to other policies in the Plan the sites could be acceptable for a range of self-contained and non-self contained residential uses, such as, but not necessarily limited to accommodation for students, older people, supported or specialised accommodation or large-scale purpose built shared living .</u>"</p>
5.1 Central Place	MM9	MM10, MM11, MM12, MM13, MM14, MM15, MM16, MM17, MM18,	Resident (MMR_15)	<p>Thames Water and the Environment Agency should have been engaged in discussions before this Plan went to the Inspectorate. This failure threatens the viability of a substantial number of its major proposals, undermining the Local Plan's credibility. Approval should be denied until this engagement has been undertaken with the subsequent approval of necessary infrastructure planning and funding.</p>	<p>The Council did engage with both. The reference to water infrastructure relates to small scale localised interventions, rather than strategic ones which it is appropriate to individual developments to address. There will be sufficient safeguards through conditions attached to planning permissions to ensure that development does not place an unacceptable impact on local water infrastructure with its potential associated adverse environmental impacts.</p>	<p>No change.</p>

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		MM19 & MM20				
5.1 Central Place	MM22		Resident (MMR_15)	This will result in over-development of the disused sidings. There are issues with accessibility and potential flooding. Instead the site should be naturalised to extend and enhance the green corridor and contribute to the Council's Climate Emergency Strategy. Delete MM22.	The policy seeks to balance up the potential of the site given its location and characteristics with the impact on the character of the surrounding area. The development is likely to be car free or car-lite given its PTAL 4 score, but in any case there is sufficient area in which to accommodate safely any small scale vehicular access points required to service the site, if necessary with left in left out only. The site is not within either a fluvial or surface water floodzone 3. Whilst there is some potential for elevated ground water and incidences of historic sewer flooding these are not considered significant impediments to development and can be addressed through the planning application process. The SINC designation, along with a requirement to meet the urban greening factor and provide for net bio-diversity gain will ensure betterment for ecology.	No change.
5.1 Central Place	MM8		Sport England (MMR_17)	The specific inclusion of outdoor sports provision and Multi Use Games Areas (MUGA's) in the anticipated infrastructure, as separate from local and park requirements, is welcomed. It provides clarity of expectations. The Council's up-to-date sport facility strategies should inform new provision.	Noted	No change
5.1 Central Place	MM13		Transport for London (Spatial Planning) (MMR_23)	Welcome car free development being prioritised.	Noted	No change.
5.1 Central Place	MM15		Transport for London (Spatial Planning) (MMR_23)	Welcome division into two separate site allocations and addition of 'The development should not compromise the ability to add potential platforms at Wembley Park station on the Chiltern Line Aylesbury Branch.'	Noted	No change.
5.1 Central Place	MM22		Transport for London (Spatial Planning) (MMR_23)	Welcome separation from BCSA7 and that a car free development would be desirable.	Noted	No change.
5.1 Central Place	MM15		TfL Commercial (MMR_25)	Agree with the change of wording from "replacement of the existing office space" to "replacement of TfL ancillary accommodation". Also support revised indicative capacity which reflects extant planning application. The planning history box should be amended to reflect the Resolution to grant planning permission for "Demolition of existing buildings and structure and redevelopment of the site to provide 454 residential units, 1,101sqm of replacement train crew accommodation and 115sqm of commercial floorspace across five buildings ranging from 13-21 storeys in height."Text should better reflect the new development context information from technical reports submitted through 20/0967.As the site is within a Tall Building Zone, the following text should be added for consistency with other policies: <u>"The site falls within the Tall Building Zone as such it is suitable for tall buildings."</u>	Noted. In response to Barratt London who have made a similar representation, the Council has agreed to update the planning history and wording on the trees on site.	Amend MM15 to: " No relevant planning history. 20/0967 - Resolution to grant planning permission – Demolition of existing buildings and structure and redevelopment of the site to provide 454 residential units, 1,101sqm of replacement train crew accommodation and 115sqm of commercial floorspace across five buildings ranging from 13-21 storeys in height." There is a row of mature trees along the site boundary on Brook Avenue which ideally should be retained are of a limited quality. Development proposals should look to retain the existing trees but where this is not possible, compensatory tree planting should

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						<i>be provided that delivers a betterment on the existing, both in terms of tree quality and quantum....."and "...The site falls within the Tall Building Zone as such it is suitable for tall buildings..."</i>
5.1 Central Place	MM22		TfL Commercial (MMR_25)	Support new flexibility of wording around taking a design-lead approach. Indicative capacity is, however, too conservative and would result in densities of ~142dwpha. Given this is an underutilised brownfield site with a PTAL of 4, this should be increased. This is a complex site which will require significant infrastructure requirement, and as such, initial feasibility studies demonstrate higher densities are required to bring the site forward.	As set out in paragraph 4.15 of the Plan indicative capacities are not an impediment to site allocations accommodating more development. None of TfL's capacity assessment work has been shared with the Council's policy team, or submitted as part of the Local Plan representations which makes it difficult to comment more specifically. The relatively narrow linear form of the site, together with need for setback from the railway line, plus the close proximity of the two storey residential care home with its associated sun lounge room/communal courtyard amenity space to the north are likely to limit the extent of site coverage/position of buildings. This together with the Secretary of State calling in the Wembley Park station application to consider the appropriateness of its height indicate the sensitivity of this edge of Wembley to increased height and that the Council's approach to site capacity to reflect relatively modest provision of homes is at this stage appropriate.	No change.
5.1 Central Place	MM7		Resident (MMR_31)	Parts unsound as allows for tall building development in inappropriate areas. This is considered acceptable in the main Wembley Park area, but not outside, which was agreed in the Wembley Area Action Plan. This would damage the suburban character of the residential areas of Wembley Park and Wembley Hill which have previously been protected. As such, the area which is identified as appropriate for tall buildings should remain the pre-existing Wembley masterplan area, and not elsewhere within Wembley.	The approach of limiting tall buildings to areas previously identified around Wembley Park in the Wembley Area Action Plan is not considered appropriate due to the changes in circumstances, including the increase in dwelling numbers required and more pertinent in the case of Wembley the impact of existing consents for tall buildings which have changed the townscape context significantly.	No change.
5.1 Central Place	MM7		Resident (MMR_31)	To make sound again, the following sentence should be reinstated, which should also be reflected in the policies map and policy BD2: <u>'The taller elements within the area will be consistent with the parameters set out in the Wembley masterplan associated with the outline planning permission 15/5550 for the remainder of Wembley Park.'</u>	This application has subsequently been subject to Section 73 amendments including changes to the parameters of heights of buildings in certain locations, so reference to the original outline permission and associated masterplan is not considered appropriate.	No change.
5.1 Central Place	MM15		Resident (MMR_31)	BCSA7 unsound as indicative capacity would result in overdevelopment. Heights required to deliver these units would breach set maximums, design principles which identify up to 10 storeys and stepping up slightly, and especially given this location was identified as inappropriate for tall buildings in the Wembley Area Action Plan. The site is also within an area of open space deficiency which this development would exacerbate. This is seen as an effort to legitimise a recommendation on an application received at planning committee November 2020. To make sound the figure should be reduced to its previous 300 units, or preferably less.	The inclusion of the site within the Tall Buildings Zone reflected the changes in circumstances of increased housing targets and to a large extent the changes in heights of development given consent within Wembley Park close to Wembley Park station. The site has a very high PTAL rating and London Plan policy placed more weight on increasing intensity of development at stations. The modification to the indicative capacity reflected the emerging scheme subject to pre-application discussions, which ultimately was approved in principle by the Council's	No change

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					planning committee subject to a S106 planning obligation. This balanced up a wide range of policy requirements, including in this case building heights and the maximisation of affordable housing delivery. The change to capacity reflected the increased certainty of housing delivery associated with the site progressing through the application process. As has rightly been identified, the application has been called in by the Secretary of State for his determination. Should this result in the application being refused then the Secretary of State's reasons will likely provide clarity to deliver an alternative acceptable scheme. As indicated in paragraph 4.15 the indicative capacity should not be used to justify otherwise non-policy compliant schemes. Given that both the Council and GLA consider that the scheme is in principle acceptable, a reduction to 300 dwellings is not considered appropriate at this stage.	
5.1 Central Place	MM10	MM11, MM14, MM19, MM21, MM28, MM30, MM39, MM53, MM54 & MM65	Environment Agency (MMR_35)	Support the modification stipulating recommendations of SFRA L2 should be followed.	Noted	No change.
5.1 Central Place	MM7		GLA/Mayor (MMR_37)	Welcomes intention to amend the term 'employment' to 'industrial' where appropriate throughout the document, ensuring appropriate protection, intensification and future development of industrial land.	Noted	No change.
5.1 Central Place	MM12	MM14	GLA/Mayor (MMR_37)	Welcome intention to maximise the re-provision of industrial floorspace as part of future redevelopment.	Noted	No change.
5.1 Central Place	MM16		GLA/Mayor (MMR_37)	Welcome that maximum industrial floorspace re-provision will be sought should the site's current plans be changed.	Noted	No change.
5.2 East Place						
5.2 East	MM23		Canal and River Trust (MMR_1)	Support the modification: 'To improve the setting and attractiveness of the Welsh Harp as a recreational and wildlife asset.'	Support welcomed	No change.
5.2 East	MM25		Canal and River Trust (MMR_1)	Support the modification that identifies that Staples Corner master planning will involve key stakeholders. As the owner of the Brent Reservoir, we look forward to working with the Council to identify appropriate waterside uses and opportunities to improve environmental quality in this area.	Support welcomed	No change.
5.2 East	MM27		Canal and River Trust (MMR_1)	Support the modification which includes the addition of 'The potential for tall buildings will be considered taking account of the need not have a detrimental impact on the Brent Reservoir Site of Special Scientific Interest, reducing in scale towards its residential and open space edges.'	Support welcomed	No change.
5.2 East	MM28	MM35	Universities Superannuation Scheme (MMR_6)	Unnecessary to include an overarching reference to Compulsory Purchase Orders. This should only relate to smaller fragmented parts of the allocations where it could help bring these forward comprehensively. This should also be replaced with a commitment to work collaboratively with landowners to ensure the future	The reference to compulsory purchase is considered appropriate and necessary for inclusion within the policy, should for any reason the Council be required to use such powers. The policy makes reference to	No change.

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				success of the area on the larger parts of the allocations such as Falcon Park and Capitol Park.	masterplanning involving key stakeholder, landowners and developers which will give these groups the opportunity to shape its content including likely phasing of delivery. The CPO process is not one that the Council often pursues, only doing so where it is absolutely necessary and all other means of seeking to work with landowners/ occupiers have failed. The CPO process provides sufficient safeguards to protect site owners/tenants' interests. In addition, the delivery timetable for the Neasden Stations Growth Area which extends beyond 10 years recognises that some sites will take much longer to deliver taking account of the existing premises high levels of occupation and likely building lifetimes.	
5.2 East	MM25		Universities Superannuation Scheme (MMR_6)	The timing of the draft of the Neasden Stations' Growth Area SPD which has been subject to consultation is premature. Normally it would be expected to follow adoption of the Local Plan. The commitment to engage with landowners is welcome, however this has not happened, meaning USS has been unable to commit to any of the SPD's options. Would welcome the Council's engagement with USS and other landowners.	It is not the case that draft SPDs are normally consulted upon after a Local Plan has been adopted. It is a relatively common practice in providing greater clarity on outcomes to help shape and understand the policy and ensure early delivery on sites. Under London Plan policy E7 intensification, consolidation and co-location of LSIS is subject to a co-ordinated masterplanning process rather than ad-hoc planning applications. As such, it is in the interest of landowners and developers for the SPD to be brought forward in a timely manner. The Council has engaged with landowners both informally prior to public consultation and formally during the draft SPD consultation phase. Attempts were made to engage early on with USS but received no response. The Council will continue to seek to engage and work with landowners who are a key part in ensuring that delivery outcomes can be achieved.	No change.
5.2 East	MM26		Universities Superannuation Scheme (MMR_6)	Support the principle of BEGA1A. Whilst not objecting to redeveloping and intensifying Falcon Park in the longer term, there needs to be recognition that it currently provides fully let, good quality units offering and range of jobs and services. The policy should support switching to alternative employment uses on Falcon Park in the interim before it is redeveloped. When redeveloped it should be clear it should aim to increase employment provision as well as consider co-location with residential. Whilst supporting a high-level masterplan, it should be made clear each landowner is able to bring forward their part of the allocation in a phased manner which should be agreed. USS does not want to be in a position where it precludes development of the wider masterplan by not developing its site. It should also be clear each site landowner will be responsible for the detailed masterplanning following the general principles of the overarching masterplan. BEGA1A should include: <u>"The Falcon Park Industrial Estate is a good quality, functional and fully occupied industrial estate. As this site is separate from the main area of the Neasden Stations Growth Area it could continue to operate in its existing use without contributing to piecemeal development. It could also be redeveloped in the longer term to include a mix of industrial and housing should the demand for industrial uses change."</u>	It is recognised that Falcon Park provides relatively modern premises that are fit for purpose in meeting current occupiers needs. The policy indicates that housing delivery will occur over time, thus it is implicit that in all likelihood premises and sites will be used for other purposes before then. The Council is providing the positive framework for the area to develop to its potential given its proximity to public transport through the masterplan. It considers that the development sites will essentially be for the site owners or developers to bring forward and that this will also be reliant upon issues such as lease lengths and viability of development, Vs retaining uses as they are and economic cycles. The Council's intervention in site assembly will only occur where absolutely necessary and all other mechanisms of potential agreement have otherwise been exhausted. To date compulsory purchase has only really been pursued in relation to its own estate development, or where the Council is a significant land owner and	No change.

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					delivery of planning permissions of sites that are otherwise ready for delivery is being frustrated by 3rd parties, such as in South Kilburn. It is considered that the current policy framework provides a sufficiently flexible approach to the site future either for mixed use industrial/residential purposes in the longer term, but continued flexible use for industrial occupation in the short to medium term.	
5.2 East	MM28		Universities Superannuation Scheme (MMR_6)	The indicative capacity of 2,000 homes should be seen as a minimum across the whole allocation and not used to prevent new homes coming forward once this has been met. Support alteration of 10+ years to 11+ years for the longer-term development sites.	It is agreed that the indicative capacity should not be regarded as a cap, however Paragraph 4.15 sufficiently addresses this matter.	No change
5.2 East	MM35		Universities Superannuation Scheme (MMR_6)	The commitment to work with landowners to develop the masterplan included in BEGA1 is not included in BNSA1 and should be added to it. Policy BNSA1 should also acknowledge Falcon Estate is good quality and that change to employment uses before a masterplan has been prepared and the site is ready to come forward for redevelopment will be supported.	The inclusion of working with landowners to develop the masterplan does not need to be duplicated. In any case, the masterplanning process has started to occur and there has been engagement with landowners where they responded to Council requests for discussions. The owners of Falcon Estate have been invited to contribute to the masterplans initial development as well as having the opportunity to respond to the draft SPD consultation.	No change
5.2 East	MM29		Marchmont Investment Management (MMR_7)	The modification is ambiguous. Unless clarified it could imply development, including industrial uses that are entirely appropriate within this area, would not be permitted until a comprehensive masterplan has been prepared. It is clearly drafted to restrict non-industrial development coming forward ahead of a masterplan for co-location. Restriction of industrial development is inconsistent with London Plan Policy E7. The Council needs to ensure the pipeline and enhancement of industrial floorspace is supported in SIL, to prevent detriment of both the local and regional economy. Proposed modification: "...industrial floorspace. <u>Non-industrial</u> , piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted."	The wording deals with non-industrial development before a masterplan is adopted and is clear it will not be permitted in advance of an approved masterplan. The next sentence related to piecemeal applies to all types of development that could prejudice the delivery of a comprehensive masterplan. In advance of a comprehensive masterplan, it would be very difficult to refuse an application for smaller site industrial development within the SIL on the basis that it would prejudice delivery of the masterplan, so this is unlikely to happen. Nevertheless, post adoption of a masterplan such industrial piecemeal development could be considered inappropriate.	No change
5.2 East	MM26		Maddox Planning (MMR_12)	Policy BEGA1A inclusion is supported as its general thrust and in particular, support towards provision of tall buildings close to Neasden Station is agreed. It should be made clearer this should not be limited to land south of the stations, but north and south where it has a high accessibility and can be demonstrated to come forward without causing undue harm. This will optimise the density of development in locations well served by public transport ensuring consistency with national planning policy paragraph 125. Amend modification: "...Neasden Lane. Tall buildings will be located <u>on sites</u> close to the stations and along the <u>north and south</u> of the underground line whilst reducing in scale towards its residential edges. All developments....	The Tall Buildings Zone identified for the area is extensive and defines the extent of where tall buildings (subject to stepping down towards the edges where smaller scale development adjoins) will be suitable. The wording is reflective of the zone, being focussed on the area around the stations, but also extending to the south of the underground line towards Dudden Hill Lane and is considered appropriate as is.	No change.
5.2 East	MM26		Transport for London (Spatial Planning) (MMR_23)	Welcome statement that 'Space will be provided for and the development will integrate with a potential new West London Orbital Station accommodated adjacent to Neasden Lane.' However, wish to see a clear requirement in the policy for sufficient land to be safeguarded and for development of the site to contribute directly to either the delivery of a new station should the plans for the West Orbital rail link proceed	The current wording around space for the WLO and for the development to integrate with the potential station is considered appropriate and this issue is also covered in BEGA1 infrastructure requirements. Site owners' emerging plans are accommodating space for and integrating with the stations. Viability of development in accommodating all	Amend MM28: "...Neasden station has a constrained ticket hall and stairways. TfL has identified that there may be a need to consider station improvements to accommodate development related demand, with associated financial

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				within an appropriate timescale or to station improvements at the existing Neasden station.	current identified policy requirements is likely to be challenging and it is anticipated that contributions to the WLO station would principally be through CIL. Nevertheless, to provide flexibility on where contributions to create appropriate station capacity, reference to contributions towards WLO will be added to infrastructure requirements in BEGA1 through MM28.	contributions. <i>Similarly contributions may also be sought for the new WLO station where it is used to justify additional on site development, capacity should it proceed within an appropriate timescale....."</i>
5.2 East	MM28		Transport for London (Spatial Planning) (MMR_23)	Welcome requirement for development to take account of the operational requirements of rail infrastructure and the need to provide mitigation for any impacts and to consider the potential for a future bus/cycle/pedestrian link between Neasden Lane and Great Central Way and, if possible, allow sufficient space within the layout to allow this longer term aspiration to be delivered. Welcome acknowledgement that Neasden station has a constrained ticket hall and stairways and that TfL has identified that there may be a need to consider station improvements to accommodate development related demand, with associated financial contributions. Welcome reference to space being provided for a West Orbital line station with potential for platforms for 8 car trains. Welcome the requirement for engagement with TfL and Highways England and the submission of an independent Transport Assessment taking account of updates to TfL strategic modelling and mitigation for any impacts on the strategic road network.	Noted.	No change
5.2 East	MM29		Transport for London (Spatial Planning) (MMR_23)	Welcome intention to work with TfL to secure a car free development and to improve links across the A5 and North Circular to rail stations. Concerns about overspill parking should be addressed through the use of appropriately targeted parking controls including the use of CPZs as advocated in policy T6.1 of the London Plan 2021. West London Orbital potential opening date should be changed from 2026 to 2029. Welcome the requirement for engagement with TfL and Highways England and the submission of an independent Transport Assessment taking account of updates to TfL strategic modelling and mitigation for any impacts on the strategic road network.	Noted. It is acknowledged that the pandemic has interrupted the likely progress of WLO and that 2029 is now a more realistic timescale.	Amend MM29: "...Brent Cross West Thameslink station will open in 2022 which could also be served by the West London Orbital in 2029....." New minor mod to para 3.33: "...and potentially the West London Orbital with additional stations at Harlesden and Neasden (2029)....."
5.2 East	MM31		Transport for London (Spatial Planning) (MMR_23)	The site is ideally suited to a bus garage with its use retained. We do not support amended wording referring to "replacement <u>or relocation of bus depot</u> ". Support addition of ' <u>An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.</u> '	Noted, whilst re-location may not be preferred by TfL, sufficient safeguards exist within the policy to ensure that operational capacity for bus storage/servicing is maintained either on or off-site. It would be unreasonable to not allow relocation if operational capacity could be appropriately provided elsewhere.	No change.
5.2 East	MM24		TfL Commercial (MMR_25)	Support inclusion of 'not subject to site allocations' in part d, however, do not support inclusion of no more than 2 storeys above prevailing heights for developments in areas where designated heritage assets will be impacted, which is limiting. This would restrict the delivery of 5 storey developments in areas where the prevailing heights are 2 storeys, but the location is otherwise suitable. Such developments have been delivered successfully, for example, in instances where a difference in ground level helps better integrate taller elements. Given D3 and GG2 of the London Plan which regard land optimisation, we would welcome a more flexible, and design-led approach in the wording of this policy.	The Council has taken a proportionate approach to heights in this place and identified opportunities for significant areas to accommodate tall buildings and also mid-rise buildings in town centres and intensification corridors in an area that is essentially for the most part two storey. It considers that it has taken an appropriate balance between seeking to increase housing delivery to meet London Plan minimums by allowing for a change of character in some areas, whilst recognising that the prevailing character is and will be likely to remain two storey	No change

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					suburban across the majority of this place and the borough.	
5.2 East	MM26		TfL Commercial (MMR_25)	Support identification of Neasden Stations Car Park within BEGA1.	Support welcomed.	No change.
5.2 East	MM23		Brent Cycling Campaign (MMR_34)	Does not mention active travel where it clearly should. Why?	Noted. It is recognised that given the limited access to public transport identified as a challenge, improvements to active travel in association with new development could be highlighted as an opportunity.	Amend MM23 Opportunities first bullet point as follows: 'The opening of the ThameslinkBrent Cross West station in 2022and proposed creation of a WestLondon Orbital passenger routeon the Dudding Hill freight linewill significantly improve publictransport accessibility in thevicinity of Staples Corner andNeasden station. <i>This and other development also can support improvements to the movement network to encourage more active travel in this place.</i> '
5.2 East	MM26		Brent Cycling Campaign (MMR_34)	At least mentions cycling	Noted	No change.
5.2 East	MM27		Brent Cycling Campaign (MMR_34)	Should address walking and cycling *at* Staples Corner as well	Agreed that these should also where possible be improved.	Amend policy MM27 BEGA2a as follows: 'Improvements to the public realm, cycling and walking routes <i>within Staples Corner as well as</i> along and across the North Circular Road and the Edgware Road;'
5.2 East	MM28		Brent Cycling Campaign (MMR_34)	Why does this use stronger wording about pedestrian routes, but not the same tone about cycle routes.	It is agreed that it would better to focus on improvements for all forms of active travel rather than just an improved pedestrian environment.	Amend MM28 BEGA1, planning considerations: 'Neasden Lane and Dudden Hill Lane pedestrians ' environment should be improved <i>to encourage greater active travel</i> through <i>measures such as</i> wider pavements, tree planting and, additional overlooking/ active frontages.....High quality pedestrian <i>and cycle</i> links should be provided between the existing and new station. Improvements should also be made to their connectivity with Church End and Neasden town centres.'
5.2 East	MM29		Brent Cycling Campaign (MMR_34)	Needs to remove reference to problem at Staples Corner.	It is not clear what this representation is specifically addressing.	No change
5.2 East	MM28	MM29	Highways England (MMR_39)	Support modifications to BEGA1 and BEGA2 which now reference the need to consult Highways England given the developments potential to impact upon the Strategic Road Network, in accordance with the Statement of Common Ground between Highways England and the Council.	Noted	No change.
5.2 East Place	MM24		GLA/Mayor (MMR_37)	Welcome retention and promotion of the intensification of industrial uses within Kingsbury LSIS in accordance with London Plan Policy E7.	Noted	No change.
5.2 East Place	MM28		GLA/Mayor (MMR_37)	The intention to downgrade part of the site from SIL to LSIS has only now been made explicitly clear. It should be made much clearer in the site allocation,	The proposed modification to remove the SIL designation was part of those identified prior to the	No change.

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				supporting text and illustrated in maps. This together with other proposed modifications significantly reduces Wembley SIL. The draft Plan should explain how lost SIL industrial capacity would be reprovided elsewhere in accordance with London Plan Policy E7, for example through industrial intensification elsewhere. The safeguarded waste site's future should be made clear. If remaining, downgrading of the SIL and introduction of residential could jeopardise its ability to effectively function. London Plan para 9.8.11 sets out importance of SIL for locating waste treatment facilities. If re-located, it should be part of a waste plan and consistent with Policy SI 9. The Agent of Change principles should also be followed to minimise potential for disturbance and conflicts of use.	submission of the Plan for examination and reflected changes that had been made to the Policies Map and were also set out in the Brent Industrial Land Audit 2019, which the GLA commented on. This section of SIL changed to LSIS at Neasden Lane is small and has essentially no functional relationship with Wembley SIL, effectively being an island isolated from it by a railway track. Vehicular access between the two areas is between 2-2.5 miles depending of whether travelling to of from Neasden Lane. Its severance from Wembley SIL, the principal vehicular routes being through residential areas, combined with its proximity to the Proposed West London Orbital line with the associated mixed use opportunities provided by a very high PTAL site close to an existing station meant that on balance, the removal of this designation was considered necessary to provide the flexibility for co-location and a more effective use of the site. As a protected waste site, the policy is clear that the capacity of this site will need to be reprovided, either elsewhere or on site. The provisions of the West London Waste Plan also apply.Paragraph 6.4.18a, in support of policy BE2, outlines the Council's approach to the intensification of industrial land in the borough which is considered sufficient. The policy is clear that industrial capacity across the whole area would be subject to masterplanning identifying how more than a 0.65 plot ratio of the designated industrial areas can be achieved.	

5.3 North Place

5.3 North	MM36		DTZ Investors (MMR_20)	Support the revised allocated uses and confirmation of no expectation of replacement retail floorspace and that the allocation's replacement element relates to industrial and office space/affordable workspace. Support inclusion within a Tall Buildings Zone. Note new aspiration for redevelopment to ensure historic building lines are reinstated along Edgware Road. It is unclear what the historic building line is and to what part of history the master planner should revert to. This may not be effective. Unclear about how 'that the retail element appears to be trading well' conclusion has been reached. Retail warehousing has struggled significantly following the structural changes to retailing, many retailers, whilst in occupancy, are not trading financially sustainably. However, the proposed wording, to not require replacement retail floorspace but recognising that there is a future role for retail floorspace if it is required to support a viable intensive development, is an appropriate balance and should be maintained.	Noted. On the historic building lines, the point is well made and research of older maps indicates that buildings on the site that preceded those currently on site were in fact set back much further than current buildings. From a good urban design perspective it would be best for people walking along the street to feel that they are overlooked, that there is active frontage and reasonable level of enclosure. On this basis it is suggested that reference to ensure historic building lines along Edgware Road are reinstated is removed as its likely to have the reverse of desired outcomes and that it is replaced with alternative wording.	Redevelopment at this site should ensure that historic building lines are reinstated , <u>brought closer to Edgware Road to provide an appropriate sense of enclosure</u> and that active frontage is provided at <u>ground floor level along Edgware Road this is achieved.</u>
5.3 North	MM36		Transport for London (Spatial Planning) (MMR_23)	Object to deletion of: 'The council will encourage the use of lower parking provision, in line with London policy.' Publication of London Plan 2021 policy T6.1 means it is even more important that lower parking provision is encouraged.	Noted, the change was for brevity as the Council will apply the appropriate London Plan/Local Plan standards.	No change.

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5.3 North	MM37		Transport for London (Spatial Planning) (MMR_23)	Welcome requirement that supporting infrastructure will need to be included in a forthcoming masterplan, TfL looks forward to working with the Council and other stakeholders to develop the masterplan. Support 'Improvements to site accessibility, prioritising funding toward the most sustainable modes of transport' requirement.	Noted.	No change.
5.3 North	MM33		TfL Commercial (MMR_25)	The height limit for town centre and intensification corridor development under Policy BP3 Part (b) is unnecessarily restrictive. This should be amended to be more flexible, following a design-lead approach which optimises the development of sustainably located brownfield land in accordance with London Plan policies D3 and H1, and NPPF paragraph 11. As a minimum, it should be made consistent with policy BD2 which states that in these areas opportunities to go higher may be possible at strategic points.	The Council has taken a proportionate approach to heights in this place which is typically of low density character and two storey dwellings. Within this prevailing character mid-rise buildings in town centres and intensification corridors are considered to be appropriate. Notwithstanding the Place based policy BD2 would still apply, allowing for exceptions where suitably justified.	No change.
5.3 North			Brent Cycling Campaign (MMR_34)	Strongly dispute the use of the word 'significant' in para. 5.3.14, this infrastructure would qualify as below standard expected and is not inclusive.	Noted. See proposed change.	Amend paragraph 5.3.14 as follows: 'The existing significant cycling infrastructure within this place, includes an on-road cycling route along the A5 and Fryent Way, and an off road cycling route which passes through Roe Green Park.'
5.3 North	MM35		Brent Cycling Campaign (MMR_34)	Addresses connections between Stag Lane and Edgware Road, but not the roads themselves.	The new and enhanced pedestrian and cycle routes between Stag Lane and Edgware Road will be delivered in accordance with the most up to date standards, in line with policy BT1. Their connection and quality, as well as opportunities for active transport routes elsewhere will be considered holistically as part of the local transport network. Such implementations will be made as can be reasonably expected as far as they relate to development at this site. This may include improvements of the active transport infrastructure on adjacent road networks, and their linking up with the site.	No change
5.3 North	MM35		GLA/Mayor (MMR_37)	Welcome requirement for a masterplan approach prior to introduction of non-industrial uses, consistent with London Plan Policy E7.	Noted	No change.
5.3 North	MM37	MM48, MM49, MM51, MM83	GLA/Mayor (MMR_37)	Welcome requirement for a masterplan approach prior to introduction of non-industrial uses, consistent with London Plan Policy E7 resulting in maintaining or exceeding current levels of industrial capacity.	Noted	No change.
5.4 North West Place						
5.4 North West	MM40		Sport England (MMR_17)	Support change from playing ' <i>pitch</i> ' to ' <i>field</i> ' and the term aligns with National and Sport England Policy. Also welcome the Council seeking to protect and enhance John Billam Playing Fields.	Noted	No change
5.4 North West	MM42		Sport England (MMR_17)	Welcome clarity and potential requirements in relation to 'ball strike'.	Noted	No change
5.4 North West	MM42		Transport for London (Spatial Planning) (MMR_23)	Welcome recognition of TfL ownership of Northwick Park station and adjacent railway land. TfL is working with Brent Council to increase capacity and introduce step free access at Northwick Park station. However, it needs to be made clear that proposed development on the wider development site would be expected to	Planning considerations does identify '...Northwick Park Station which will need step free access available to all platforms....' Nevertheless, it could be made clearer that this is an infrastructure requirement. This section currently identifies	Amend MM42: "...Improvements to the capacity of, and pedestrian accessibility to <i>and within</i> , Northwick Park Station, <i>including step free access to all platforms...</i> "

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				provide a significant contribution towards these works. TfL is unable to provide a commitment to these works without significant third party funding. The list of infrastructure requirements should include that the development will also need to deliver step free access.	improvements to pedestrian access to the station are required, but is not specific about step free.	
5.4 North West	MM43		Transport for London (Spatial Planning) (MMR_23)	Support the principle that 'If parking is provided it should be made publicly available and be designed to serve the wider town centre', but based on the estimated future PTAL of 5 – 6a, all retail and residential development should be car free to ensure compliance with the London Plan 2021. 'An appropriate amount of car parking spaces will need to be retained for the superstore' should not be included following publication of the London Plan 2021. Welcome 'Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.'	Noted. The wording of the policy recognises the role that the current car park plays in supporting the town centre by allowing for linked trips and providing for a store of sufficient scale that it provides an anchor to the centre. Whilst the site itself has high PTAL, this drops off considerably across the catchment area for this store. It is agreed that home deliveries are increasing in popularity, however this form of retail is currently still reliant on car based access to remain viable. Without sufficient incentive/ flexibility the site is unlikely to be brought forward by Sainsbury's for development if the store's business model still requires some car parking. The Council will seek to limit car parking as much as possible as its provision is expensive and often does not support the most effective use of land which is likely to impact on other outputs such as the amount of affordable housing.	No change
5.4 North West	MM40		Northwick Park Partnership (MMR_32)	The indicative dwelling numbers should not have been reduced. The figures proposed within extant applications for both a detailed first phase of development (654 homes) and outline for 1,600 homes and 51,150m2 of student facilities only refer to a part of the wider allocation. There is no reason or evidence base provided that justifies a reduction in the allocation at this late stage.	The indicative has been amended taking account of more detailed work associated with the outline and full permissions considered by planning committee. This includes appropriate assumptions on existing dwellings to be lost and self-contained dwellings proposed, plus an estimation of additional student bed spaces applying London Plan/NPPF conversion factors for non-self contained to self-contained dwellings monitoring figures. Notwithstanding the representation, the outline scheme appears to represent the maximum amount of development that can be accommodated on site in terms of building volume for those parts that realistically will become available. The remaining area within the ownership of the hospital outside the outline application contains few areas without buildings, or buildings of low intensity use that might be easily considered as potential for residential. On this basis, without a fundamental change to the existing higher plot ratio/ intensively used purpose built hospital buildings for which there does not appear to be any clear plans/ or commitment from the Trust to change, it is difficult to see where additional capacity for residential will be generated. On this basis the indicative capacity identified is regarded as being the most appropriate approximation at this time and no evidenced alternative has been provided in association with the representation made. As indicated in paragraph 4.15 the indicative capacity does not act as a ceiling, so should circumstances	No change

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					change, this will not act as an impediment to alternative proposals for the hospital site.	
5.4 North West	MM42		Northwick Park Partnership (MMR_32)	Again, the housing figure should not be reduced, and the student homes were stated in floorspace rather than units. This has not been evidenced and lacks justification at this late stage. The application should not refer to reference numbers. For instance, the road application has already been superseded by 21/2714. Support identification of site for tall buildings and that the site should be subject to a masterplan approach, using a sensitive design which responds positively to existing structures. As such, the policy should allow the masterplan to determine the best scale of development. We would therefore require the following amendment: 'There is potential for tall buildings, subject to being a high quality design. These should respond to the height of the existing hospital buildings, stepping down towards the MOL and areas to the north. Consideration should also be given to impact on the locally protected views as identified in the Harrow Local Plan. The appropriate height, extent and location of buildings will be identified within a masterplan for the site.'	The figures represent those that were presented to planning committee as an estimate of the net-self contained dwellings, including appropriate conversion of student to self-contained dwellings conversion factors, to be delivered when the application was considered. The reference to application numbers admittedly can date quite quickly and in this instance can be updated to reflect the latest permission. In terms of heights of existing buildings on site, taking account of the parameters identified as acceptable in the outline which have considered wider range views and the impact on the MOL that it is not necessary to specifically reference tall buildings responding to the height of existing buildings. Nevertheless, as with all Tall Buildings Zones and in particular this site's position adjacent to the MOL, it is considered appropriate to retain the principle of a stepping down to the MOL and areas to the north, which is reflective of the general strategy set out within the outline permission, although inclusion of the word generally can provide the flexibility necessary such as that show within the parameters of the outline for a tall building marking the entrance to the site when walking from Northwick Park station.	Amend MM42: "...There is potential for tall buildings, subject to being a high quality design. These should respond to the height of the existing hospital buildings, generally stepping down towards the MOL and areas to the north..... "
5.4 North West	MiM67		Northwick Park Partnership (MMR_32)	Support inclusion of Northwick Park Growth Area on figure 20.	Support welcomed.	No change.
5.4 North West	MM41		Brent Cycling Campaign (MMR_34)	Does not mention active travel.	Noted. See proposed change.	Amend MM41 paragraph 5.4.45 to: ' <u>...serve access to the hospital. This strong public transport network will need to be supported by improvements to the public realm, encouraging more active modes of transport such as walking and cycling, enabling the linking of multi modal trips.</u> '
5.5 South Place						
5.5 South Place	MM48	MM49, MM58, MM59, MM60, MM62, MM63, MM64, MM65, MM66, MM67,	Transport for London (Spatial Planning) (MMR_23)	Welcome additional wording recognising the site's potential for car free development.	Noted	No change

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		MM68, MM70, MM71, MM72, MM73, MM76, MM77, MM78				
5.5 South Place	MM52		Transport for London (Spatial Planning) (MMR_23)	Support addition of: 'An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.' Welcome: 'The site has high PTAL which means development should be car free'. Do not support addition of 'or a range of industrial uses' to the justification. It implies a range of industrial uses could be an acceptable alternative to the bus depot's re-provision. This is not the case.	Noted. It is not agreed that inclusion of 'or a range of industrial uses' implies that this could be an acceptable alternative to the bus-depot's re-provision, as it is clear that an operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.	No change
5.5 South Place	MM53	MM54	Transport for London (Spatial Planning) (MMR_23)	Welcome amended wording 'Car free development should be the starting point' and removal of a requirement that this is 'subject to a Controlled Parking Zone being achieved'. Welcome requirement that 'The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought'.	Noted	No change
5.5 South Place	MM44		Wembley Towers (MMR_27)	Note reference to Wembley Point, Bridge Park Leisure Centre, and the Unisys Buildings at Stonebridge providing an unattractive gateway into the borough. This is important and denotes the capacity of high quality/ density, permeable development to provide a strong urban frontage in this area, offsetting the negative impacts of the North Circular.	Noted.	No change.
5.5 South Place	MM45		Wembley Towers (MMR_27)	Support policy, especially with regard to criterion b) an c). This does not identify a specific height limit for the area which is determined by the existing Wembley Point, and will be identified at later stages through a high quality design-lead approach. Supporting text 5.5.14 is also supported, as this regards the potential for the area to develop into a high quality cluster of taller buildings.	Noted.	No change.
5.5 South Place	MM53		Wembley Towers (MMR_27)	130 units have been permitted on the Argenta House site (18/4847), and 439 through permitted development at Wembley Point (18/3125) to make a total of 569 which is reflected in the new indicative capacity. This is supported, however, should be amended to reflect the remaining capacity of the Wembley Point site which is currently at feasibility stage. The indicative capacity should therefore be increased to 1,150 to reflect this identified capacity.	The policy recognises that "Should flood risk modelling approved by the Environment Agency result in changes to the extent of the functional floodplain, a higher level of development may be achievable." Whilst pre-application discussions have been occurring and the Environment Agency has agreed the revised modelling that takes all of the site apart from the river channel out of functional floodplain, all the site does however remain in fluvial Zone 3. The water heights, speed of flow and potential for rapid inundation are significant risks to life during times of flood. There is also the potential displacement of water from existing land available for flood storage by new buildings which will need to be compensated for. Whilst solutions for compensation may be available on or off-site, at the moment without clarity on how the site's location within the floodplain can be satisfactorily addressed any assessment of potential capacity is likely to be	No change.

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					highly speculative. On that basis no change is considered appropriate.	
5.5 South Place	MM53		Wembley Towers (MMR_27)	The allocation inaccurately states that the site includes extensive areas of flood zone 3b (functional floodplain) and that any changes to its boundary will need to be agreed with the Environment Agency (EA). The EA has already confirmed that the site is outside of flood zone 3b, being entirely within 3a. The following modification is therefore required: "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 recognised that the Environment Agency has now agreed to an amended catchment model submitted as part of pre-application discussions, which is a significant change. As such it is agreed that the text can be modified.	Modify MM53 to: "Wembley Brook and River Brent are potential sources of flooding and <u>nearly all the majority</u> of the site is within <u>fluvial</u> Flood Zone 3a. <u>Recent flood modelling has shown the majority of the site to be no longer within flood zone 3b. Part of the site is within including extensive flood zone 3b (functional floodplain). Development, other than water compatible uses, will not be acceptable within functional floodplain.</u> Any flood modelling from applicants which seeks to justify a revision to the functional floodplain boundary will need to be agreed by the Environment Agency."
5.5 South Place	MM53		Wembley Towers (MMR_27)	Do not support the requirement for all development proposals to be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2. This assessment identifies part of the site as functional floodplain, and states that no development should take place in this area, undermining the development aspirations set out within the site allocation, and is inconsistent with the Environment Agency whom have removed the site from functional floodplain. As such, reference to this requirement should be removed.	The SFRA Level 2 takes account of the potential for the modelling to be amended in this location. Notwithstanding its removal from 3b, the SFRA Level 2 site assessment still contains valid, up-to-date and useful mitigation guidance not only on fluvial flood risk (flood zone 3 in general) but other sources of flood risk so to remove the reference on the basis of the 3b element alone is considered excessive. It still has value even if the 3b recommendations are no longer applicable.	No change.
5.5 South Place	MM53		Wembley Towers (MMR_27)	Reference is made to the site being within light industrial use. It should be made clear that this is with regard to Argenta House only as is the case. Therefore the requirement for re-provision only relates to Argenta House. The same is true for affordable workspace provision. The remaining area does not have any land use restrictions. The site is however appropriate for a mix of uses, particularly at ground floor level which will be activated to draw people to the station. The removal of the affordable workspace requirement is supported, however, the wording is still too prescriptive on this matter, and should encourage a range of uses which may include affordable workspace in accordance with NPPF paragraph 20. Therefore modifications are required as below: "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."	Agreed, the implementation of the prior approval means that for all of the site with the potential for additional development over that which already has consent, there are essentially no existing local employment site uses. Given the change to BE1 which seeks affordable workspace only as part of major (3,000 sq.m.) employment schemes, the Council's position to require affordable workspace is not justified. On this basis, the modification suggested is considered appropriate.	Amend MM53 to: "The site was until recently predominantly in employment use. As such provision of some <u>employment uses, including some</u> affordable workspace, will be <u>encouraged sought</u> on site, as part of the potential uses associated with a new mixed-use community."
5.5 South Place	MM53	MM104	Wembley Towers (MMR_27)	Requirement for the delivery of Build to Rent and Specialist Older Persons Housing on-site should be subject to a detailed feasibility assessment, but not mandated. Amendments should be as below: '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 current wording is appropriate in making reference to those policies, which are subject to their own separate criteria and policy justification which do not need to be reinterpreted or commented on within the site allocation.	No change.
5.5 South Place	MM53		Wembley Towers (MMR_27)	The requirement for future development to mediate between Wembley Point and Unisys buildings is not supported. The existing heights of these buildings should not provide the basis for any constraints on height. It is accepted that	Consistent with its approach to the development of Argenta House, the Council considers that the existing height of Wembley Point essentially provides	No change.

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				proposals should be proportionate in scale to these buildings, but to mediate between them is too restrictive, undermining the proposed Tall Building Zone. This therefore requires greater flexibility as below: "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. 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 maximum height that is regarded as appropriate in this location.	
5.5 South Place	MM53		Wembley Towers (MMR_27)	Agree development is likely to create a demand for community and cultural uses, however, the requirement for these is unnecessarily restrictive. These should be delivered on site, but the policy should recognise that the allocation may be delivered in phases as below: "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.	The extent of community and cultural facilities will be reflective of the prospective size of development and the size of new community created, which as yet is unknown due to the need to address matters such as flooding and the feedback of needs from social infrastructure providers related to that population increase. The emphasis on being 'required' as part of any development provides clarity of the obligation of the development to meet those needs, whilst the emphasis on 'support' for such uses dilutes this to perhaps be regarded as a 'nice to have'. As such the suggested modification is not supported.	No change.
5.5 South Place	MM44		Stonebridge Real Estate Development (MMR_29)	The additional text makes reference to the replacement of existing redundant tall buildings, disregarding any opportunity to retain existing structures as would be the most sustainable option. This should be amended as follows: 'Improve Stonebridge Park gateway through redevelopment of Argenta House/Wembley Point and Unisys/Bridge Park sites. Unisys/Bridge Park presents the potential for a comprehensive redevelopment to replace the existing of the redundant tall buildings for alternative uses next to the North Circular and provide a scale of enabling development to support provision of a modern leisure centre with swimming pool.'	Noted. The point is fair in that it may be possible to repurpose the existing buildings. As such the proposed modification is considered acceptable in principle, but amended to take account of redevelopment of the remainder of the site and change of use of the redundant tall buildings.	Amend MM44 to: ".....Unisys/Bridge Park presents the potential for a comprehensive redevelopment to replace the existing including the reuse of the redundant tall buildings next to the North Circular for alternative purposes and provide a scale of enabling development to support provision of a modern leisure centre with swimming pool.....'
5.5 South Place	MM45		Stonebridge Real Estate Development (MMR_29)	Criterion c) should not make explicit reference to building heights but should rather take a design-lead approach as alluded to elsewhere within the policy, which seeks to establish the area as a tall building gateway to the borough. Amendment required as follows: 'c) There is an opportunity for some taller buildings near Wembley Point. This will be subject to buildings being of the highest design quality, and enhancing the local setting. Additional taller buildings of up to 15 metres (5 storeys) could be appropriate in the intensification corridors of A404 Harrow Road/ Brentfield/Hillside and Carven Park, A407 High Road and A4088 Dudden Hill Lane.'	It is noted that criterion c) is not proposed as a modification and that this comment would have been more appropriate at Regulation 19 stage. Notwithstanding its location adjacent to an intensification corridor, the identification of Wembley Point within a Tall Buildings Zone provides greater flexibility on height as long as the development steps down towards its edges. The example showed in the Tall Buildings Strategy of a perimeter block stepping down shows some variety of height, some of which is well above the lower height of adjacent buildings on the edges, although the height and massing overall is more sympathetic to those adjacent heights.	No change
5.5 South Place	MM54		Stonebridge Real Estate Development (MMR_29)	Support allocation. Allocated uses should be identified as 'potential' uses, subject to feasibility work (especially with regard to non-residential uses). Amendment required as follows: "Allocated Use: New leisure centre, hotel, office, residential, with potential for small scale commercial and community uses."	This amendment is not considered necessary as the site lends itself to a variety of small scale commercial and community uses which would ordinarily be expected to support a new residential community,	No change.

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					plus take account of existing non-leisure community uses in the Bridge Park buildings and the existing Local Employment Site. The extent of these will be based on what can realistically prove to be viable once the finer detail of the scheme becomes apparent.	
5.5 South Place	MM54		Stonebridge Real Estate Development (MMR_29)	Update capacity to take into account detailed site analysis which identifies capacity for up to 1,000 dwellings.	No evidence has been provided to the Council in terms of the Local Plan review to support an amendment of the indicative capacity, which was based on a scheme that showed a high intensity use of the site. The site's location within fluvial and surface water Flood Zone 3 will require compensatory flood storage capacity if there is an increase in building footprints above those which exist. As identified in the Plan para 4.15 in any case, the indicative capacity should not be considered a ceiling on appropriate dwelling numbers if other policy aspects can be satisfactorily addressed.	No change
5.5 South Place	MM54		Stonebridge Real Estate Development (MMR_29)	Requirement for the delivery of Build to Rent and Specialist Older Persons Housing on-site should be subject to a detailed feasibility assessment, but not mandated. Amendments should be as below: '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 current wording is appropriate in making reference to those policies, which are subject to their own separate criteria and policy justification which do not need to be reinterpreted or commented on within the site allocation.	No change.
5.5 South Place	MM54		Stonebridge Real Estate Development (MMR_29)	Support identification of hotel use within site allocation.	Noted	No change.
5.5 South Place	MM80	Map Mod 18	Sonal Worldwide Ltd (MMR_30)	Support inclusion of site within Growth Area. Support aspirations of BP7 and delivery of substantial number of new homes, however, target figure of 6,800 units should be a minimum.	The policy does identify a minimum 6,800 additional homes.	No change
5.5 South Place	MM80		Sonal Worldwide Ltd (MMR_30)	Also support aspiration to deliver creative industries, and co-location of residential and industrial uses. To ensure existing uses are taken into account when considering the delivery of industrial uses, the following text should be added to BP7: " e i) When considering applications for residential development within industrial and employment land, flexibility should be given to sites which can demonstrate existing and established non-industrial uses, such as residential uses; "	Notwithstanding residential use of this site on upper floors allowed through the prior approval process within designated SIL, some employment floorspace exists on the respondent's site at ground floor level which has the potential to meet for employment needs. These types of unplanned incursions which would not ordinarily have been allowed through the planning application process create a legacy of 'non-conforming' residential uses in designated industrial areas. In these scenarios the solution to the potential for further residential development will vary, taking into account the prospect for betterment of what is likely to be 'sub-standard' dwellings in terms of current lack of compliance with development plan policies, the potential for re-provision or increase in quality or quantum of employment floorspace and also impacts on adjacent designated industrial land occupiers. In this scenario each case will be judged on its merits, the Council does not accept that flexibility 'should' be given through a change in policy, as such development may	No change

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
					still be inappropriate in designated industrial areas. It will however take a pragmatic approach, taking account of the NPPF and local policy considerations.	
5.5 South Place	Map Mod 31		Sonal Worldwide Ltd (MMR_30)	Retention of SIL designation on site not justified given established residential use through permitted development, as accepted by the Council, and must be removed. Also question why adjacent woodland SINC area remains designated SIL. The Brent Employment Land Demand Study (2015) recommended the removal of the Northfields Industrial Estate from SIL designation as it would enable wider regeneration of the area; had high vacancies; impact from industrial uses; help achieve wider housing targets. This study identified this site as remaining in employment use as residential would be inappropriate due to proximity to the North Circular. This did not take into account the permitted development for change of use to residential, despite being published three months after this was granted. This was also missed by the later Industrial Land Audit (2019) study. This also fails to take into account other similar sites across London which have been successful in mitigating against these identified concerns. With regard to the study and its recommendations, this site should be released so as to contribute to the overall regeneration of the area, providing new housing and viable non-residential floorspace over what exists currently, and integrate into the emerging Northfields Masterplan site, catalysing development of other similar sites adjacent to the North Circular and helping to overcome any associated issues. It should also be noted that the recommendations of both the above mentioned Brent studies, as they relate to this site, are at odds, with the later suggesting retention as SIL whilst the former suggested de-designation. For retention of SIL the 2019 study stated low PTAL as reason for avoiding residential uses, for which it should be noted, the site is within an 8-12 minute walk of Stonebridge Part LUL/ overground station, and a number of bus stops. Indeed the PTAL is likely to increase to 3 in the near future due to improvements to bus routes, extending the 83 route, and increasing the frequency of the 112. Redevelopment of the site will also enable greater access to the canal. There is also a limited range of industries which a 0.254ha site could accommodate, with low potential for the movement of HGV's, with smaller light industrial type uses being better suited to such sites, which can be co-located with residential. Conversion to LSIS would also provide issues, and would benefit greater from de-designation to Local Employment Site, providing flexibility of use.	The 2015 Employment Land Study was dealing with a situation in which it was identified that there was surplus industrial land capacity. In this scenario it took account of the size of Northfields and the ability to consolidate the site to be used for residential purposes, but also plan for providing new industrial floorspace that would better meet business needs, rather than the dilapidated space and open storage that existed on site. This resulted in a comprehensive development of a sufficient scale to support a new community with its associated social infrastructure as well as a new separate high quality industrial facility cross-subsidised by the residential development. The site's location adjacent to the North Circular Road and the fact that it is bounded by designated SIL area within the borough to the east and also to the west in the neighbouring LB Ealing means that notwithstanding the fact that it does have some residential use on site, as it is not wholly within this use, including employment floorspace, and is part of a wider contiguous area identified for its strategic industrial role its removal from the SIL designation is not considered appropriate. The justification for the site to be regarded as a high intensity residential location is of limited merit. Whilst it will be close to the Northfields residential development, the physical links to this development are poor with very limited prospect of being improved to such an extent that they will form a meaningful link/ integration. This leaves this site as an island in a harsh environment dominated by heavy traffic and predominantly industrial land uses. Notwithstanding potential limited improvements to public transport accessibility, the adjacent uses present dead inactive frontage along the North Circular at off-peak times when residents are most likely to be accessing Stonebridge Station to the east which is unlikely to significantly change. In these circumstances its retention as SIL provides a clear indication that the Council will support its use for high intensity occupation by industrial floorspace, as is adjacent.	No change.
5.5 South Place	Map Mod 18		Sonal Worldwide Ltd (MMR_30)	Support inclusion of site within Tall Building Zone, however, consider height limit of up to 78m too restrictive. Heights should be determined by a design-led process. The adjacent Northfields masterplan site includes a number of buildings which exceed this height.	The site is on the edge of the Tall Buildings Zone and is small, giving it limited ability to step down in any meaningful way through a series of buildings over its extent to provide a stepped transition between it and the adjacent Northfields development. Adjacent industrial buildings are unlikely to rise to significant heights that would get near to this maximum, which would make very tall buildings on this site	No change.

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
					approaching the maximum inappropriate. On this basis it is considered for this particular site, there would be no need to amend the height range acceptable within the zone.	
5.5 South Place	MM53		Environment Agency (MMR_35)	Support the modification that is consistent with the Statement of Common Ground	Noted	No change.
5.5 South Place	MM48		Asiatic Carpets Ltd (MMR_38)	<p>Elements are not sound, either being not justified, not clearly written or do not evidence how a decision maker should react to a development proposal. The wording does not clearly reflect how an application in the Asiatic Carpets site should be determined. It should refer to the relevant policies, rather than clumsily explaining them within the allocation text. The allocation should also be clear that the masterplan is for the Church End Growth Area, rather than an allocation. This modification is not in accordance with MM109, which does not require Local Employment Sites to increase industrial floor space. It also prevents the mixed-use allocation from being delivered until the Council adopt a masterplan. The masterplan requirement is unreasonable and un-evidenced as it effectively prevents the site from boosting the housing supply, should a masterplan never be adopted by the Council. Modify the policy: "Redevelopment will be consistent with London Plan policy E7 and Brent Local Plan policy BE2 and BE3. It will be subject to a masterplan-led approach <u>for the whole Church End Growth Area, demonstrating comprehensive development will result in a net increase in employment overall industrial floorspace totalling the maximum viable that can be achieved from the existing local employment site, and from the LSIS a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater.</u>" and "Piecemeal development which would prejudice the delivery of a comprehensive masterplan-led approach for the Church End Growth Area will not be permitted"</p>	<p>The policy refers to relevant policies within the text, only expanding where the site specifics require further elaboration, such as here where there exists both LSIS and Local Employment Site designations. Here a distinction is made upon the requirements of both land parcels, with LSIS requiring a minimum delivery of industrial floorspace, whilst the Local Employment Site needs to deliver the maximum viable. The approach is therefore consistent with policy BE3 and associated modification MM109. The Asiatic Carpet site shares an access road with the LSIS and is in close proximity to it, as such the Council considers that some appreciation of how the Asiatic site would sit in terms of not compromising the wider site allocation's development is still appropriate, through a masterplanned approach. It is correct that a masterplan is to be delivered by the Council for the whole Church End Growth Area. This masterplan is currently being drafted with the Council's consultant team KCA having engaged with the local community and businesses as part of the evidence base gathering over the last year. It is anticipated the formal consultation on the masterplan will occur in early 2022 and adoption Summer 2022, as committed to in the current Local Development Scheme. This will provide developers with greater certainty and will therefore serve to speed up delivery. It is not clear if Asiatic Carpets are intent on bringing forward an application before that date as no formal pre-application discussions have taken place to date which would normally be anticipated on a site of this size. As worded currently the lack of reference to the wider masterplan provides more flexibility and the opportunity for the Asiatic carpets developer to produce a masterplan for the site allocation in association with an application in the unlikely event that the Council's masterplan consultation is delayed significantly.</p>	No change
5.6 South East						
5.6 South East	MM56		Sport England (MMR_17)	Support change from playing 'pitch' to 'field' and the term aligns with National and Sport England Policy.	Noted	No change
5.6 South East	MM79		TfL Commercial (MMR_25)	Support increased indicative capacity.	Support welcomed.	No change.

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
5.6 South East Place	MM76		Theatre Trust (MMR_2)	Support revised text as it better facilitates the safeguarding of the Gaumont State building, in particular in retaining the car park to enable shows and productions and the revising description of significance.	Support welcomed	No change.
5.6 South East Place	MM69		Sport England (MMR_17)	Support MUGA re-provision and the requirement of a Community Use Agreement for it and other spaces within the school. School facilities are important for local communities to be active and Sport England's 'Use our School' tools could be of assistance.	Noted	No change
5.6 South East Place	MM74		Transport for London (Spatial Planning) (MMR_23)	Welcome removal of infrastructure requirement 'Potentially parking', which should be reinforced with the 'Car free development should be the starting point' statement in line with other similar PTAL site allocations.	Noted	No change
5.6 South East Place	MM79		Resident (MMR_24)	Objection to BSESA35. Existing use "storage" is only correct with regard to 303-305. All 5 floors of 307-309 are the Manor Health and Leisure Club. Currently the owner is not anticipating redevelopment although change of use to the upper floors of Nos. 307-309 could be a more immediate prospect. Should redevelopment be considered, then some residential could well be expected. However, inclusion of an industrial element where none currently exists in what is primarily a residential area will not be a viable option. It would be potentially damaging to the residential environment and prejudicial to overall prospects of redevelopment. It is of insufficient size to accommodate both residential and industrial uses (Class B2) due to on-site servicing facilities. Delete site allocation BSESA35.	Noted. An amendment to reflect the presence of the existing health club can be made. The representation misunderstands the application of Policy BE3 for the re-provision of industrial space that would apply to this Local Employment Site element of the allocation site. This allows for a wide range of industrial uses that can adequately be accommodated within a residential environment and does not a sole focus on B2. Pre-application material submitted indicates the need for a more comprehensive approach to the site as the owner's current plans for 307-309 have the potential to fetter a more effective use of 303-305 whether that be through upward extensions or redevelopment.	Amend BSESA35 existing use: "Storage <i>and health and fitness centre</i> ." and proposed use to: "Residential, <i>commercial</i> and industrial"
5.6 South East Place	MM78		GLA/Mayor (MMR_37)	Welcome industrial floorspace increase sought in the site's redevelopment consistent with London Plan Policy E7.	Noted	No change.
5.7 South West						
5.7 South West	MM80		TfL Commercial (MMR_25)	The height limit for town centre and intensification corridor development under Policy BP3 Part (b) is unnecessarily restrictive. This should be amended to be more flexible, following a design-lead approach which optimises the development of sustainably located brownfield land in accordance with London Plan policies D3 and H1, and NPPF paragraph 11. As a minimum, it should be made consistent with policy BD2 which states that in these areas opportunities to go higher may be possible at strategic points.	The Council has taken a proportionate approach to heights in this place and identified opportunities for significant areas to accommodate tall buildings and also mid-rise buildings in town centres and intensification corridors in an area that is essentially for the most part two storey. It considers that it has taken an appropriate balance between seeking to increase housing delivery to meet London Plan minimums by allowing for a change of character in some areas, whilst recognising that the prevailing character is and will be likely to remain two storey suburban across the majority of this place and the borough.	No change.
5.7 South West	MM87	MM88, MM89	Brent Cycling Campaign (MMR_34)	Support the reference to "A publicly accessible east/west walking/cycling route should be provided along the northern edge of the canal side..." Will need to be inclusive and fully accessible to anyone regardless of their age, gender or level of ability.	Support welcomed. Policy BT1 makes reference to TfL design standards. This includes the TfL London Cycling Design Standards. Guiding principle 4 makes reference to the need for inclusive design, as is reflected throughout the document. This is considered sufficient for the Local Plan does not seek to duplicate extant material.	No change.
5.7 South West Place	MM83		Transport for London (Spatial Planning) (MMR_23)	Negotiations are ongoing about securing a replacement bus garage site in connection with proposed development that would include Alperton bus garage but welcome 'An operational bus garage of equivalent capacity needs to be	Noted	No change

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
				retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.' Welcome: 'Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.'Welcome: 'Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.'		
5.7 South WestPlace	MM83		Resident (MMR_8)	Out of context with and changes the two storey character of the area.Further congestion will be expected with increasing traffic levels on poor quality roads and insufficient provision of parking spaces.Local resources such as doctors and dental surgeries are already strained and no plan to address this, which will mean rapid turnover of residents.No bus route improvements have been made and the station is at full capacity.Development overshadows the nearby school who should have been consulted on its impact on children's safety and educational experience.Creating a ghetto will increase crime and anti-social behaviour further than recent rises which no one at the Council appears to be concerned with.Alperton was a small village, current development will make it more like a central London hub.	The need to achieve very ambitious housing requirements means that on the limited amounts of sites that the Council has been able to identify as appropriate for development that significant increases in density in some locations is required. As an area with particularly high PTAL and a good range of local infrastructure, Alperton is such an area and is considered appropriate for Tall Buildings.The majority of development will be car free or 'car-lite' with minimal vehicle parking provision. Combined with controlled parking off-site and improvements to bus services, public transport and other more sustainable modes of transport, impacts are considered likely to be acceptable.On health care the Council has engaged with the CCG and developments such as Northfields have provision for additional surgeries, whilst other community/ commercial floorspace being provided in the developments will allow for dental and other NHS and commercial medical facilities to be provided. Bus route improvements are planned and contributions to improved public transport have been attained. The site allocations seek an appropriate contribution towards improving access/ capacity at Alperton Station.Over-shadowing of the school is likely to be limited in its duration, with detailed planning applications considered impacts and appropriate mitigation, such as bulk, massing and location of tall buildings.The design of buildings and places will be in accordance with good urban design principles and include input from the police's secured by design officer. The amount of residential in areas currently occupied by industrial uses is likely to increase natural surveillance, having the potential to reduce crime, although it is accepted that the general increase in population and associated per-capita crime rates may lead to a increase in incidents of crime overall.London is a dynamic place in which areas go through continual change, sometimes this has resulted in loss of population with its associated issues, other times, such as now it is seeking to accommodate a rapid and sustained increase in population. Alperton's characteristics mean that it provides an opportunity to accommodate significant	No change.

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
					amounts of development to meet the needs of the increased population, which will undeniably change its character.	
5.7 South West Place	MM84		Transport for London (Spatial Planning) (MMR_23)	Welcome 'This must be retained or enhanced as part of any development and early discussion with TfL London Buses on this should take place.' in relation to the bus stand. Welcome: 'Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.'	Noted	No change
5.7 South West Place	MM85		Transport for London (Spatial Planning) (MMR_23)	Welcome: 'Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.' Welcome: 'Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.'	Noted	No change
5.7 South West Place	MM86	MM87, MM88	Transport for London (Spatial Planning) (MMR_23)	Welcome: 'Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.'	Noted	No change
5.7 South West Place	MM89		Transport for London (Spatial Planning) (MMR_23)	Welcome: 'Contributions to improve Beresford Avenue, the bus network, Stonebridge Park station and surrounding walking/cycling routes to mitigate the impact of the development on the surrounding movement network'. Welcome: 'Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.'	Noted	No change
5.7 South West	MM89		St. George (MMR_26)	Support increased indicative capacity and changes to timeframes. The Secretary of State directed the Mayor to achieve 'the minimum level' of home delivery. London Boroughs must be in general conformity with the London Plan, and as such, indicative capacities must be identified as minimums. Flexibility is required to respond to evolving needs. To make sound amendments required as follows: INDICATIVE CAPACITY: A minimum of 3,350 new homes TIMEFRAME FOR DELIVERY: 11+ Years: 2,056 1,976 + DESCRIPTION OF EXISTING SITE: Three industrial units remain along Beresford Avenue and are currently occupied under of which two are under the ownership of St George, with the third unit held under a different ownership. There is also a temporary information centre with associated parking that is accessed from Beresford Avenue towards the west of the site, which is currently being operated as a marketing suite for the Grand Union development. PLANNING HISTORY: Approved hybrid planning permission 18/0321 as amended by permission 19/2732 and 20/2784 and a number of other non-material amendment applications for the comprehensive redevelopment of the former Northfields industrial estate. The scheme proposes demolition of all existing buildings on site and the delivery of a mixed-use development including 3,030 homes, around 2,300sqm commercial floorspace, a minimum of 17,581sqm and up to 19,000sqm employment floorspace and 1,610sqm community and assembly and leisure floorspace (use classes B1a, B1c and B8), up to 2,900sqm community and assembly and leisure floorspace (uses classes D1 and D2), an energy centre, public and private open space, new routes and public access along the River Brent and Grand Union Canal, parking and cycle provision and new site	The Council considers that there is no merit in identifying the site capacities as minimums. Paragraph 4.15 sets out how the indicative capacity should be interpreted. However, given the more recent amendment to the outline consent, a change in indicative capacity to 3,350 dwellings is considered appropriate, with the associated change for 11+ years of 1,976. The description of the existing site can be amended to reflect change in ownership of the units. It is agreed that the planning history should be updated, but reference to the wider range of non-residential elements should remain. Within the planning considerations it is agreed that the application references can be updated. However, it is considered that the reference to the historic SIL designation is appropriate, although the provision of the amount of floorspace provides clarity. The change of name in planning risks is considered appropriate. Design principles - the reference to more recent permissions is considered appropriate. Minor changes to the justification to reflect permissions are considered appropriate.	Amend MM89: "INDICATIVE CAPACITY: 3,350 3,030 new homes"" TIMEFRAME FOR DELIVERY: ...11+ Years: 2,056 1,976 " PLANNING HISTORY: "Approved hybrid planning permission 18/0321 as amended by permission 19/2732 and 20/2784 and a number of other non-material amendment applications for the comprehensive redevelopment of the former Northfields industrial estate. The scheme proposes demolition of all existing buildings on site and the delivery of a mixed-use development including 3,030 3,350 homes, around 2,300sqm commercial floorspace, a minimum of 17,581sqm and up to 19,000sqm employment floorspace and 1,610sqm community and assembly and leisure floorspace (uses classes D1 and D2), an energy centre, public and private open space, new routes and public access along the River Brent and Grand Union Canal, parking and cycle provision and new site " PLANNING CONSIDERATIONS: "Consistent with planning permission 18/0321 as amended by permission 19/2732 and

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
				access and ancillary infrastructure. PLANNING CONSIDERATIONS: Consistent with planning permission 18/0321 as amended by permission 19/2732 and 20/2784 , due to the site's historic employment use SIL designation a minimum of 19,801 sq.m. of industrial and employment floorspace of the typology and affordability associated with that planning permission must be re-provided as part of the development. RISKS: Potential need for Compulsory Purchase Order of later phases to ensure delivery of site not owned by St George . DESIGN PRINCIPLES: The scale and massing should be sympathetic to existing heights in the surrounding context with lower building heights closer to Beresford Avenue. Tall buildings are appropriate on this site consistent with the heights parameters established by planning permission 18/0321 (as amended by application 19/2732 and 20/2784). Given the scale of the site, it can create a new building height character. JUSTIFICATION: The approved scheme seeks to provide for the redevelopment of this industrial site with a high density, residential-led mixed-use development. It will provide a minimum of 3,350 homes, industrial and employment floorspace, community, retail and leisure facilities and includes both a health centre and an energy centre.		<i>20/2784</i> , due to the site's historic SIL designation a <i>minimum of 19,801 sq.m. of industrial and employment</i> floorspace of the typology and affordability associated with that planning permission must be re-provided as part of the development." RISKS: "Potential need for Compulsory Purchase Order of later phases to ensure delivery of site not owned by <i>Berkley Homes St George</i> ." DESIGN PRINCIPLES: "...Tall buildings are appropriate on this site consistent with the heights parameters established by planning permission 18/0321 (as amended by application 19/2732 <i>and 20/2784</i>)..." JUSTIFICATION: "...It will provide <i>3,350 3030</i> homes, industrial <i>and employment</i> floorspace, community, retail and leisure facilities and includes both a health centre and an energy centre....."

Chapter 6 Themes

6.1 Design

6.1 Design	MM94	Map Mod 26	Barratt London (MMR_4)	Support Brent's Tall Building Zone strategy, the inclusion of Site Allocation BCSA7 within the Wembley Tall Building Zone and the removal of the core area from the Zone. We would welcome clarification within Policy BD2 that the metric within the tall buildings zone relates to height of buildings rather than AODm.	The acceptable heights are those above ground level as referenced in relation to the intensification corridors and town centres, whilst it is assumed most people would read it this way for all references to heights in the policy it is accepted that this could be made more explicit to provide greater clarity in Policy BD2.	Amend MM94 to: "A tall building is one that is more than 6 metres above the general prevailing heights of the surrounding area or more than 30 metres in height <u>above ground level</u> . Tall buildings are directed to the locations shown on the policies map in Tall Building Zones, intensification corridors, town centres and site allocations. In Tall Buildings Zones heights should be consistent with the general building heights <u>above ground level</u> shown on the policies map, stepping down towards the Zone's edge."
6.1 Design	MM94	Map Mod 19	DTZ Investors (MMR_20)	Support Tall Building Zone strategy, BNSA2's inclusion within a Tall Building Zone and removal of the 'core' from the Zone. Would welcome clarification within Policy BD2 that the metric within the tall building zone relates to the height of buildings, rather than AODm. It is unclear how the height of 51 metres has been derived and the evidence base to support this. Planning permission 17/2284 (Park Parade Mansions) is above this threshold at 18 storeys. Zenith House opposite	It is agreed that Park Parade Mansions which was formally given consent in July 2021 is taller than 51 metres; including lift over-run it is about 61 metres high from Edgware Road. On this basis it is accepted that the appropriate heights should be amended to 61 metres. This will still be complementary to the	Amend Map Mod 19 to: "Up to 51 <u>61</u> metres"

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				comprises c.17 storeys; and the Northern Quarter (TNQ) at Capitol Way is c.17 storeys. Given the Council's increased housing needs and limited available growth area sites, evidence would suggest allowable heights should be increased across the Opportunity Area.	general heights shown as being appropriate for this area within the LB Barnet Tall Buildings Update December 2019.	
6.1 Design	MM94		TfL Commercial (MMR_25)	<p>The height limit for town centre and intensification corridor development under Policy BP3 Part (b) is unnecessarily restrictive. This should be amended to be more flexible, following a design-lead approach which optimises the development of sustainably located brownfield land in accordance with London Plan policies D3 and H1, and NPPF paragraph 11. Opportunities to go higher at strategic points in town centres should also be extended to Intensification Corridors.</p> <p>Support the Tall Building strategy and the inclusion of Site Allocation BCSA7 within the Wembley Tall Building Zone, and the removal of the 'core' area from this zone.</p> <p>We would welcome clarification within Policy BD2 that the metric within the tall building zone relates to the height of buildings, rather than AODm.</p>	<p>Noted. The intensification corridors generally have a greater consistency of character and height than town centres which have been subject to more change over time and higher intensity development. The Council has identified extensive areas for intensification, which will continue to sit in close proximity to side streets or properties to the rear where heights are likely to remain two or occasionally three storey. The approach is considered balanced and justified.</p> <p>For the sake of clarity it is agreed that reference to heights of buildings in DB2 should be from ground level.</p>	<p>Amend MM94 to: "A tall building is one that is more than 6 metres <u>above the general prevailing heights of the surrounding area or more than 30 metres in height <i>above ground level</i></u>.</p> <p>Tall buildings are directed to the locations shown on the policies map in Tall Building Zones, intensification corridors, town centres and site allocations.</p> <p>In Tall Buildings Zones heights should be consistent with the general building heights <u><i>above ground level</i></u> shown on the policies map, stepping down towards the Zone's edge."</p>
6.1 Design	MM94	Map Mod 18	St. George (MMR_26)	<p>Support identification of Alperton Tall Building ZOE and removal of core. However, do not support proposed upper limit of 75m. This is less than permitted developments, rising to 85m in height, or 116m AOD. This is not evidenced, and as such, should be amended to 95m, or noted as indicative. It should also be clarified that heights are in reference to the buildings, not AOD, and regard all developments, including commercial. The policies map should not include indicative heights as this is contrary to the London Plan design-lead approach. The definition of tall buildings within town centres and intensification corridors should be amended to 18m as opposed to 15m to reflect London Plan policy D9.</p> <p>Amendments required as follows: In intensification corridors and town centres outside conservation areas and areas of distinctive residential character developments of a general building height of 185 metres <u>when measured from ground to the floor level of the uppermost storey</u> could be acceptable, with opportunities to go higher at strategic points in town centres. Amendment of building heights shown in the draft policy map to confirm they represent building height and not AODm.</p>	<p>It is acknowledged that the heights of the permission for the Northfields site are above those identified as appropriate within the Zone. On this basis it is accepted that the heights on the Tall Buildings Zone for Alperton should be amended to up to 85 metres. The change to 95 metres is not considered appropriate as no evidence has been provided in support of this height. The policy justification para 6.1.15 provides for flexibility above heights on the policies map where suitable justification can be provided by the applicant.</p>	<p>Amend Map Mod 18 to: "Up to 78 <u>85</u> metres"</p>
6.1 Design	MM94		Wembley Towers (MMR_27)	<p>Support policy, and capacity to deliver at high densities at the Wembley Point site. Amendment required as below to make sound and consistent: "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 <u>and intensification corridors</u>."</p>	<p>The intensification corridors generally have a greater consistency of character and height than town centres which have been subject to more change over time and higher intensity development. The Council has identified extensive areas for intensification, which will continue to sit in close proximity to side streets or properties to the rear where heights are likely to remain two or occasionally three storey. The approach is considered balanced and justified. Notwithstanding its location adjacent to an intensification corridor, the identification of Wembley Point within a Tall Buildings Zone provides greater flexibility on height as long as the development steps down towards its edges. The example showed in the Tall Buildings</p>	<p>No change.</p>

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
					Strategy of a perimeter block stepping down shows some variety of height, some of which is well above the lower height of adjacent buildings on the edges, although the height and massing overall is more sympathetic to those adjacent heights.	
6.1 Design	MM94	Map Mod 24	Stonebridge Real Estate Development (MMR_29)	Support identification of site within Tall Building Zone, and removal of core from zone. Do not support height limit of 78m. Heights should be determined by design, townscape and environmental assessments at application stage. Reference to this height should be removed.	Noted. The Council is required to identify appropriate heights within the Plan to be consistent with Policy D9. 78m provides for the potential for very tall buildings in this location, which the Council is comfortable with. Notwithstanding this, as set out in the policy justification para 6.1.15 to BD2 there might also be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.	No change.
6.1 Design	MM94		Avison Young (MMR_36)	The Tall Buildings Strategy notes that a fine-grained approach to building height has not been established and further masterplanning exercises (which could be either by the Council or by landowner(s)) may provide further justification for building heights. Updated NPPF (2021) at Paragraphs 73, 125 and 129 promote appropriate tools such as masterplans and design guides or codes. This should be reflected in the policy, which should not unnecessarily preclude tall buildings or constrain development. Amend Policy BD2 ".....In Tall Buildings Zones heights should generally be consistent with the approximate general building heights shown on the policies map, stepping down towards the Zone's edge, unless robustly justified through a masterplanning exercise....." and reinstate "Elsewhere tall buildings not identified...." onwards which was proposed to be removed.	Local Plan policy BD2 has been produced in accordance with London Plan policy D9. This states that boroughs need to define what a tall building is, where they are considered appropriate, and at what heights. The Brent policy does exactly this through identifying appropriate zones and heights on the policies map. The policy is, however, potentially flexible on heights where there is justification providing flexibility by the use of 'should' and building heights being identified as 'general building heights'. Further detail is provided in supporting paragraph 6.1.15: 'There might however also be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable'. This provides sufficient flexibility should deviation from the identified heights be considered to be justified. The section following 'Elsewhere tall buildings not identified...' was deleted as GLA indicated that this was a general conformity issue and deemed not to be in accordance with London Plan policy D9, part B3. This states that tall buildings can only be developed in identified locations (i.e. those which have been identified under part B2 of the same policy).	No change.
6.1 Design	MM94		GLA/Mayor (MMR_37)	Welcome as now clearly identifies areas suitable for tall building development. Directions received from the Secretary of State in December 2020 in relation to the London Plan 2021 resulted in changes to Policy D9 Tall buildings which Brent's policy is now consistent with.	Noted	No change.
6.2 Housing						
6.2 Housing	MM93		TfL Commercial (MMR_25)	Support inclusion of 'The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent'.	Support welcomed.	No change.
6.2 Housing	MM101		TfL Commercial (MMR_25)	Support the inclusion of 'equivalent rents or lower'. Support the principle of delivering London Living Rent on BtR schemes, however, believe a mono tenure of 100% is overly restrictive, will not deliver 'a range	Policy H11 criterion A identifies the Mayor's 'genuinely affordable rent' homes to be preferably at London Living Rent level. Whilst the sentiment	No change

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				genuinely affordable rents' as required within London Plan policy H11, and will not result in the delivery of a mixed and balanced community as required within policy GG4. As such, a more balanced and flexible approach should be taken in line with policy H11, providing 30% at LLR and the remainder at a range of Discount Market Rent products as agreed with the Council.	behind providing a range of genuinely affordable rents to create mixed income occupation is understood, the Council is happy with its approach of seeking the Mayor's preference for London Living Rent levels. The fact that this tenure is pegged to incomes rather than market rents and Brent's low income levels means it is likely to endure for longer as a more affordable product. People on benefits can also be accommodated in the properties as rents are in many areas below Local Housing Allowance rates. Due to a lack of clarity on required rental levels previously, the fact that 80% of market rents are in national policy regarded as affordable and the requirement to be flexible with regards to affordable housing viability, Brent has more than enough affordable dwellings to meet 'intermediate' needs of those on reasonable incomes compared to needs identified in the SHMA. In addition, identifying a range of rents reduces certainty as the inclination of developers is to assume that they can move overall to more expensive products. Providing clarity by focusing on LLR removes that ambiguity and inclination to swap to more expensive rental products.	
6.2 Housing	MM106	MiM158	St. George (MMR_26)	Policy inconsistent with NPPF and lacks flexibility, and therefore not sound. Targets for amenity space likely to be undeliverable on high density schemes and requires greater flexibility. No evidence has been provided to support this need and how this would be delivered. Support modification MiM158 which grants flexibility when amenity space quality is maximised. Proposed modification: All new dwellings will be expected to provide have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This is normally expected to be 50sqm per family home for family housing (3 bedrooms or more) situated at ground floor level and 20 sqm for all other housing.	Evidence was provided in response to the MIQs that indicated the target was achieved or close to being achieved across a range of development scenarios, but also where it wasn't the Council was still sufficiently flexible in considering mitigating circumstances to grant permission. The policy and its application by the Council is considered to be sufficiently flexible as it includes 'normally' and sets out a range of alternatives for the standard to be achieved through communal amenity space solutions in the policy justification.	No change.
6.2 Housing	MM99		Wembley Towers (MMR_27)	Development Plans can support specific housing models, but they cannot impose them and preclude others. This is for the market to determine. Therefore whilst Build to Rent is welcomed, a policy which demands it in specific circumstances is not. This is particularly true for sites within areas which already have a large supply of Build to Rent dwellings. The policy is therefore unsound, being inconsistent with the NPPF and PPG (Paragraph: 001 Reference ID: 60-001-20180913) which advises that Plans set out their approach to promoting and accommodating Build to Rent, identifying appropriate circumstances/ locations where Build to Rent will be 'encouraged'. The policy should also identify other forms of appropriate accommodation such as co-living. Amendments should be as below: 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...'	This comment essentially goes beyond the scope of the main modification proposed to this policy and would have been more appropriate at Reg 19 stage. The current Local Plan has 'encourage' policies, whilst providing a positive policy context these nevertheless have not resulted in needs for example of older people's housing being sufficiently addressed. This is why in the context of a London Plan target and outputs from the Letwin review a more positive policy context has been included in the Plan. The exceptions set out in the policy allow sufficient flexibility, for example due to a lack of operator appetite/ interest, which presumably would otherwise result in timely development or undermine viability to the detriment of affordable housing delivery.	No change.

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
6.2 Housing	MM101		Wembley Towers (MMR_27)	Policy should be clearer on not requiring a viability appraisal if a minimum of 35% affordable housing is delivered on site. Neither is it clear what the tenure should be when meeting this threshold, as is required by London Plan policy H6. Neither does the policy lay out the affordable housing approach for Build to Rent developments. This should be included and made clear.	The Brent Local Plan does not seek to repeat upper tier policy set out in the London Plan. The policy makes reference to London Plan Policy H5 that sets out when viability assessments will be required which varies depending on the site characteristics and 35% may not be appropriate for no viability appraisal if certain criteria are met, e.g. loss of industrial floorspace or public sector land. Policy H5 paragraph 4.5.16 also refers to the threshold approach for other forms of specialist housing as set out in appropriate London Plan policies such as H13, H15 and H16. London Plan Policy H16 sets out the Council's approach to Build to Rent whilst Policy BH5 identifies Brent's preferred tenure mix.	No change.
6.2 Housing	MM106		Wembley Towers (MMR_27)	Policy onerous, particularly in built up areas which may need to instead maximise internal amenity space, whilst also providing communal amenity space or public amenity space. Supporting paragraph 6.2.100 acknowledges a range of competing demands, and as such, flexibility should be allowed where it can be demonstrated that all reasonable options have been considered. This should include the following text: <u>"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"</u>	Evidence was provided in response to the MIQs that indicated the target was achieved or close to being achieved across a range of development scenarios, but also where it wasn't the Council was still sufficiently flexible in considering mitigating circumstances to grant permission. The policy and its application by the Council is considered to be sufficiently flexible as it includes 'normally' and sets out a range of alternatives for the standard to be achieved through communal amenity space solutions in the policy justification. As such it is considered to not be necessarily to amend the policy.	No change.
6.2 Housing	MM99		Stonebridge Real Estate Development (MMR_29)	Development Plans can support specific housing models, but they cannot impose them and preclude others. This is for the market to determine. Therefore whilst Build to Rent is welcomed, a policy which demands it in specific circumstances is not. This is particularly true for sites within areas which already have a large supply of Build to Rent dwellings. The policy is therefore unsound, being inconsistent with the NPPF and PPG (Paragraph: 001 Reference ID: 60-001-20180913) which advises that Plans set out their approach to promoting and accommodating Build to Rent, identifying appropriate circumstances/ locations where Build to Rent will be 'encouraged'. The policy should also identify other forms of appropriate accommodation such as co-living. Amendments should be as below: 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...'	This comment essentially goes beyond the scope of the main modification proposed to this policy and would have been more appropriate at Reg 19 stage. The current Local Plan has 'encourage' policies, whilst providing a positive policy context these nevertheless have not resulted in needs for example of older people's housing being sufficiently addressed. This is why in the context of a London Plan target and outputs from the Letwin review a more positive policy context has been included in the Plan. The exceptions set out in the policy allow sufficient flexibility, for example due to a lack of operator appetite/ interest, which presumably would otherwise result in timely development or undermine viability to the detriment of affordable housing delivery.	No change
6.2 Housing	MM101		Stonebridge Real Estate Development (MMR_29)	Policy should be clearer on not requiring a viability appraisal if a minimum of 35% affordable housing is delivered on site. Neither is it clear what the tenure should be when meeting this threshold, as is required by London Plan policy H6. Neither does the policy lay out the affordable housing approach for Build to Rent developments. This should be included and made clear.	The Brent Local Plan does not seek to repeat upper tier policy set out in the London Plan. The policy makes reference to London Plan Policy H5 that sets out when viability assessments will be required which varies depending on the site characteristics and 35%	No change

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
					may not be appropriate for no viability appraisal if certain criteria are met, e.g. loss of industrial floorspace or public sector land. Policy H5 paragraph 4.5.16 also refers to the threshold approach for other forms of specialist housing as set out in appropriate London Plan policies such as H13, H15 and H16. London Plan Policy H16 sets out the Council's approach to Build to Rent whilst Policy BH5 identifies Brent's preferred tenure mix.	
6.2 Housing	MM106		Stonebridge Real Estate Development (MMR_29)	Policy onerous, particularly in built up areas which may need to instead maximise internal amenity space, whilst also providing communal amenity space or public amenity space. Supporting paragraph 6.2.100 acknowledges a range of competing demands, and as such, flexibility should be allowed where it can be demonstrated that all reasonable options have been considered. This should include the following text: <u>"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"</u>	Evidence was provided in response to the MIQs that indicated the target was achieved or close to being achieved across a range of development scenarios, but also where it wasn't the Council was still sufficiently flexible in considering mitigating circumstances to grant permission. The policy and its application by the Council is considered to be sufficiently flexible as it includes 'normally' and sets out a range of alternatives for the standard to be achieved through communal amenity space solutions in the policy justification. As such it is considered to not be necessarily to amend the policy.	No change
6.4 Economy and Town Centres						
6.4 Economy and Town Centres	MM107		Barratt London (MMR_4)	Support the modification to affordable workspace requirements being 10% of employment floorspace where over 3,000 sqm of employment floorspace. Also support that where exceptional circumstances preclude affordable workspace delivery on site a financial contribution for off-site provision can be secured.	Noted.	No change.
6.4 Economy and Town Centres	MM109		V Fund Ltd (MMR_5)	Given the allocation of non-designated industrial sites for residential-led development (such as Site Allocation BCSA9), the policy wording and supporting text should acknowledge that these allocated sites would be supported for development. Amend BE3 to: "....a) continued wholly employment use is unviable; or <u>b) the site is allocated for development in the Places chapter; or</u> c) development increases the "	Most of the site allocations that are Local Employment Sites indicate that they can be developed to also accommodate non-employment uses. It is however, agreed that the Plan would benefit from it being clearer that all allocations currently qualifying as Local Employment Sites have been considered appropriate for non-employment uses whilst ensuring the maximum viable replacement employment floorspace will be sought on site.	Modify MM109: "....prioritised to meet demand; <u>or c) the site is allocated for development.</u> Where criterion a) <u>or c)</u> is being used to justify the release...."
6.4 Economy and Town Centres	MM108		Universities Superannuation Scheme (MMR_6)	Support the principle to intensify industrial floorspace in Neasden Lane and Colindale LSIS, but are concerned that the 0.65 plot ratio is too prescriptive and may not be appropriate and viable when a masterplanning exercise is undertaken. This could also have implications if any existing units need to increase floorspace in the interim before a comprehensive redevelopment comes forward.	The Council has taken a proportionate approach to the need to Plan for meeting additional industrial land requirements, whilst providing for the opportunity to use land more effectively and meet housing needs taking account of viability. Applying the ratio across the whole LSIS gives sufficient flexibility to account for potential variations between potential delivery from individual sites. This policy will allow for co-location, without it as designated	No change.

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					industrial land the sites would not be identified as being acceptable for non-industrial use. As industrial areas, in the unlikely event that existing industrial premises wish to increase floorspace either through redevelopment or extension before a masterplan is agreed, the Council will consider each application on its merits. Given the need for additional industrial floorspace, it is likely to be supportive unless such a scheme is likely to be considered significantly prejudicial to delivery of the wider co-location outcomes.	
6.4 Economy and Town Centres	MM109		Universities Superannuation Scheme (MMR_6)	Support the requirement for the maximum viable re-provision of existing employment floorspace when sites are redeveloped.	Support welcomed.	No change
6.4 Economy and town centres	MiM166		OPDC (MMR_19)	<p>Since the completion of Brent's Local Plan Examination Action Ref 49 OPDC has published and submitted a Post Submission Modified Draft Local Plan (PSMDLP). In support, an updated Industrial Land Review Addendum (ILRA) has also been published. This shows the potential uplift in industrial capacity within the Brent part of the OPDC area, of a net gain of 112,873sqm. This is the same figure quoted in Action ref 49. To reflect the fact that OPDC has set out in the ILRA what can be potentially be provided in constituent boroughs within the OPDC area, small modifications to Para 6.4.18a are suggested:</p> <p>"....It is anticipated <u>that there it will be a potential net uplift in industrial capacity within the Brent part of the OPDC area play a significant role in meeting the additional needs, as evidenced in OPDC's Industrial Land Review Addendum accompanying its Post Submission Modified Draft Local Plan.</u> Elsewhere....." and "more encouraging. <u>The Council will work closely with the OPDC who are producing their Local Plan and with the GLA to clarify the extent to which intensification in Park Royal will provide additional industrial capacity. This work will also need to involve LB Ealing as Park Royal is also within their borough and similar to Brent has OPDC as local planning authority and other boroughs/stakeholders across west London if necessary. Notwithstanding this, w</u> Within the area covered...."</p>	Agreed. The modification reflects the position agreed with the GLA which was prior to fuller discussion occurring with OPDC and their submission to the examination. The suggested text from OPDC reflects the most up to date position with regards to the potential availability of sites in the OPDC area to meet Brent's identified London Plan evidence base needs.	Modify MiM166 to: "....It is anticipated <u>that there it will be a potential net uplift in industrial capacity within the Brent part of the OPDC area play a significant role in meeting the additional needs, as evidenced in OPDC's Industrial Land Review Addendum accompanying its Post Submission Modified Draft Local Plan.</u> Elsewhere....." and "more encouraging. <u>The Council will work closely with the OPDC who are producing their Local Plan and with the GLA to clarify the extent to which intensification in Park Royal will provide additional industrial capacity. This work will also need to involve LB Ealing as Park Royal is also within their borough and similar to Brent has OPDC as local planning authority and other boroughs/stakeholders across west London if necessary. Notwithstanding this, w</u> Within the area covered...."
6.4 Economy and Town Centres	MM107		DTZ Investors (MMR_20)	Support the modification to affordable workspace requirements being 10% of employment floorspace where over 3,000 sqm of employment floorspace. Also support that where exceptional circumstances preclude affordable workspace delivery on site a financial contribution for off-site provision can be secured.	Noted	No change.
6.4 Economy and Town Centres	MM107		St. George (MMR_26)	Support modification which now correctly identifies sites providing more than 3,000sq.m. employment floorspace as having to provide 10% as affordable workspace. Also support the flexibility for exceptional circumstances which disallow onsite delivery and afford alternative provision for financial contribution.	Noted.	No change.
6.4 Economy and Town Centres	Map mod 31		St. George (MMR_26)	Support removal of SIL designation from Northfields east site as set out in this map mod.	Noted.	No change.

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6.4 Economy and town centres	MM112		McDonalds Restaurant (MMR_33)	<p>We have the following policy objections to draft Policy BE5:A. The 400m exclusion zone is inconsistent with national planning policyB. The policy is inconsistent, discriminatory and disproportionate.C. Examination of other plans have found similar policy approaches to be unsound.D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.In summary, there is no sound justification for a policy such as Policy BE5, Point b, which imposes a blanket ban on hot food takeaways “within 400 metres walking distance of a primary school, secondary school or further education establishment entrance/exit point”. It should be deleted from the plan.McDonald’s supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the proposed Policy BE5 is a sound way of achieving those objectives. The underlying assumption in the policy is that all hot food takeaways (and any restaurants with an element of takeaway use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald’s own business is an example of a restaurant operation which includes takeaway but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve.In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald’s own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health.The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with Class E consents and can be delivered from the latter. The policy makes no attempt to control these uses.For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses, on supporting town centres, and on the sequential approach. There is no justification in national policy for such restrictions to be applied to hot food takeaways. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald’s from major commercial and tourist areas.For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy, concerning a school exclusion zone, for around a decade (LB Waltham Forest). It has had no discernible effect on obesity levels, which have in fact increased since its introduction.Given the overall objective of improving lifestyles and lowering obesity levels, restrictive policy regarding hot food takeaway development is a narrow-sighted approach. There is no mention of other possible reasons behind the national high levels of obesity. To discriminate against hot food takeaways alone is worrying and using the planning system to influence people’s daily lifestyle choices is not acceptable.</p>	<p>The modifications to the policy are essentially to change the now defunct A5 use class to the more recognisable use that it applies to, which are 'takeaways'. The information submitted by McDonalds would have been more appropriate at Regulation 19 stage in informing the soundness of the policy through the examination hearings MIQs. Notwithstanding this, the Council considers that the policy limiting takeaways in the manner proposed are appropriate. It is consistent with upper tier policy set out in the London Plan and the Council's role in promoting better public health outcomes, which given the nationally significant rates of obesity of Brent's younger population in particular is of increased importance. The Council's evidence of children's eating habits indicates a greater inclination to eat takeaway food more regularly where these premises are close to schools. Invariably children's focus is on unhealthy options, as these products have the highest prominence in advertising material in the media and premises. Notwithstanding healthier food options which it is accepted form a small part of the menu at many takeaway establishments, including McDonalds, and that associated information on calorie content might also be in place, the reality is that the majority of products in such establishments have relatively low nutritional value, but are of higher calorific value generated by higher fat or carbohydrate contents, producing low levels of satiation ordinarily associated with higher fibre or whole foods. Cost to calorific content they are cheaper and thus encourage people to eat more calories. They might be considered as acceptable on occasion as part of a wider balanced and healthier approach to diet, but as a major contributor in their own right, which is more likely to be the case where they are located close to schools, they do not support good health outcomes for children/younger people. The control of the number of establishments in close proximity to schools is considered appropriate and justified.Furthermore, the Local Plan needs to be in general conformity with the London Plan. London Plan policy GG3 (Creating a healthy city) part I states those involved in planning and development must seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options. London Plan policy E9 (Retail, markets and hot food takeaways) part D states hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. As</p>	No change.

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					such, the policy approach proposed has been accepted and already applies across London.	
6.4 Economy and Town Centres	MM108	MiM166, MiM167, MiM168	GLA/Mayor (MMR_37)	Welcome modifications consistent with the Statement of Common Ground which resulted in withdrawal of the Mayor's position that the draft Plan was not in general conformity with the London Plan.	Noted	No change.
6.4 Economy and Town Centres	MM109		Asiatic Carpets Ltd (MMR_38)	Substantial modification to a policy that previously allowed release of industrial floorspace where "a development increases the amount of affordable workspace in the B use class". The modification is not sound as its not justified, taking into account reasonable alternatives and not based on proportionate evidence, and its not consistent with national policy. The Plan is committed to provide at least 0.6 hectares of employment floorspace, whilst the Council's evidence indicates it can deliver up to approximately 50.5 hectares. Delivery of only part of this capacity would more than meet the minimum policy target. The Mayor was directed to remove the 'no net loss' policy to local employment sites and directed by the Secretary of State to take a more proportionate stance to allow more optimal uses for industrial sites where housing is in high demand. The modified policy is far more restrictive than previous. A further modification to MM109 is suggested to allow for the controlled release of Local Employment Sites through site allocations for residential and mixed-use development to help meet housing need. Modify BE3 through an additional criterion: " <u>c) where the site has been allocated for residential or mixed-use development in the Local Plan.</u> "	The majority of the proposed modification both seeks to make clear the Council's position on local employment sites, and include explicit reference to appropriate uses as the B use class no longer exists. Part b) now includes reference to retention of the existing employment use. This was already explicit under supporting paragraph 6.4.23 part b). This was moved into the policy text for greater clarity. The policy as worded provides flexibility on the requirement for employment floorspace reprovion should the site be released for non employment uses, requiring the maximum viable reprovion of employment floorspace. This makes no reference to net loss, and is therefore in conformity with the London Plan. The requirement for maximum viable reprovion of employment floorspace was effectively already made clear within the Plan under supporting paragraph 6.4.21 which states that 'The policy allows for the release of unviable employment floorspace...' The upshot of this text is equivalent to requiring the maximum viable reprovion, however, for clarity and due to the strong requirement of the text, it was again considered that this should be included within the policy text itself. It is therefore considered that the proposed modification is not in fact substantial given the existing texts, and that this does not result in a significantly more restrictive policy than was being proposed prior to this modification. London Plan policy E7 states that development plans should be proactive and encourage the intensification of employment sites, including non designated industrial sites. Part c of this policy states that they should only be released where there is no prospect of the site being used for industrial purposes, or industrial floorspace has been provided as part of a mixed use development. This is reflected within Brent Local Plan policy BE3, which takes a proactive approach toward intensification of industrial uses, whilst providing the opportunity for non-employment uses in instances where continued existing use is unviable, or floorspace is reprovion as part of a mixed use development. This will ensure that the identified target is met, whilst ensuring compliance with London Plan policy in ensuring a proactive approach toward industrial intensification within the borough. In addition, the London	Modify MM109: " <u>....prioritised to meet demand; or c) the site is allocated for development. Where criterion a) or c) is being used to justify the release.....</u> "

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					Industrial Land Demand Study identified a need for 46.9ha of new industrial floorspace within Brent, including the parts of Brent which have been subsumed by the OPDC. This is not identified as a target within the London Plan, however, in order for the Local Plan to be in general conformity with it and its evidence base, it was considered necessary for the Council to pursue an approach which would seek to maximise the delivery of industrial floorspace as set out in BE2, in accordance with the strategic objectives of the London Plan. In regard to the Council's evidence on capacity, the Brent Industrial Land Audit provided a high level assessment of the quantum of industrial floorspace that could be delivered if all SIL and LSIS sites were intensified to a plot ratio of 0.65. It was clear this was potential capacity rather than an indicator of what could reasonably be expected to be delivered over the lifetime of the Plan. As such, the audit recommended a number of approaches to secure industrial floorspace, including seeking an increase in industrial floorspace on non-designated industrial sites. Brent's non-designated industrial sites account for approximately 22ha of Brent's industrial land supply in terms of site area, and make an important contribution to industrial land supply. Most of the site allocations that are Local Employment Sites indicate that they can be developed to also accommodate non-employment uses. It is however, agreed that the Plan would benefit from it being clearer that all allocations currently qualifying as Local Employment Sites have been considered appropriate for non-employment uses whilst ensuring the maximum viable replacement employment floorspace will be sought on site. A modification has been proposed in response to a similar representation by V Fund Ltd.	

6.6 Green Infrastructure and Natural Environment

6.6 Green Infrastructure and Natural Environment	MiM212		Canal and River Trust (MMR_1)	Support reference to Grand Union Canal, the Brent Feeder Canal and the Welsh Harp Reservoir as non-designated heritage assets. For clarity, MiM212 should be amended to include: '.....dam the River Brent and create a reservoir (<u>known as the Welsh Harp Reservoir or Brent Reservoir</u>), an artificial lake.....'	This clarification is likely to prove to be useful as 6.6.31 MiM213 makes reference to early engagement with the Trust for schemes adjoining Welsh Harp.	Minor modification to MiM212: '.....dam the River Brent and create a reservoir (<u>known as the Welsh Harp Reservoir or Brent Reservoir</u>), an artificial lake.....'
6.6 Green Infrastructure and Natural Environment	MiM213		Canal and River Trust (MMR_1)	Support better recognition of canal heritage assets noted in MiM213, and welcome continued engagement about how the development process can support this.	Support welcomed	No change.
6.6 Green Infrastructure	MM119		Sport England (MMR_17)	Welcome open space, which often contains sports facilities and are areas for informal play, is to be provided based on current and future needs rather than a standards approach.	Noted	No change

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and Natural Environment						
6.7 Sustainable Infrastructure						
6.7 Sustainable Infrastructure	MM121		Environment Agency (MMR_35)	Support the modification that is consistent with the Statement of Common Ground	Noted	No change.
6.7 Sustainable Infrastructure	MM122		Environment Agency (MMR_35)	Support the modification that is consistent with the Statement of Common Ground	Noted	No change.
6.7 Sustainable Infrastructure	MiM219		Environment Agency (MMR_35)	Note this recognising all forms of flood risk.	Noted.	No change.
6.8 Transport						
6.8 Transport	MM123		Transport for London (Spatial Planning) (MMR_23)	Welcome addition of reference in part c to London Plan standards when referring to cycle parking requirements. Welcome part k amendments setting out how the bus network will be supported.	Noted	No change
6.8 Transport	MM124		Transport for London (Spatial Planning) (MMR_23)	Welcome first paragraph amendment that car free development 'should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking'.	Noted	No change
6.8 Transport	MM125		Transport for London (Spatial Planning) (MMR_23)	Welcome amendments supporting freight consolidation and giving greater protection for sites that have potential for water or rail freight use.	Noted	No change
6.8 Transport	MM123		Brent Cycling Campaign (MMR_34)	Good to see this now addresses relevant cycling standards, or at least "London Plan standards", however, this is not the most recent standard. Please refer to the Local Transport Note 1/20 which is the latest guidance. Reference required to inclusive cycling design standards for long and short stay cycle parking and lane design provision as in Wheels for Wellbeing guide, which informed LTN 1/20.	Noted. The policy states that facilities should be delivered in line with or exceeding London Plan standards and TfL and WestTrans design standards. TfL works closely with Wheels for Wellbeing, and strives to deliver the highest standards possible as informed by relevant evidence document, such as those produced by central government. As progressive organisations that seek to encourage greater cycling, TfL and West Trans standards are likely to be updated if national guidance now provides for a higher standard than their publications. As such, it is considered that this policy is flexible enough to point to the latest design standards without being too long and exhaustive, as may become the case should it refer to every possible standard.	No change.
6.8 Transport	MM125		Brent Cycling Campaign (MMR_34)	Encouraging freight consolidation should also include exploring logistics hubs with a greater use of cargo bikes and Council support for development investigating this option either in isolation or in conjunction with the use of sustainable alternatives, i.e. by rail and canal. Need more joined up thinking between transport and health.	It is agreed that cargo bikes can potentially play a greater role, particularly in the denser parts of Brent where distance between drops is likely to be more limited and congestion and limitations on road space/parking/loading likely to be the greatest. London Plan Policy T7 F identifies that new consolidation and distribution facilities should be supported where....2) they enable sustainable last mile movements, including by cycle....Criterion G sets out that Construction Logistics Plans and Delivery and	Amend MM125 "...ie. by rail and canal, <u>or for last mile delivery cargo cycles</u> , and pursuit of best practice....." Amend paragraph 6.8.20 to read: '...Larger developments should include facilities to enable micro-consolidation. <u>This should be considered as part of a wider approach, and include sustainable</u>

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					Servicing Plans will be required and developed in accordance with TfL guidance and in a way which reflects the scale and complexities of development. TfL Guidance is now relatively old (2017) and makes no mention of cargo bikes. On this basis a more explicit reference in the Brent Local Plan policy T7 to cargo bikes is considered appropriate, as well as supporting text.	<u>last mile deliveries, including where appropriate prioritising the use of cargo bikes .'</u>
Chapter 7 Delivery and Monitoring						
7 Delivery and Monitoring	MM127		Brent Cycling Campaign (MMR_34)	There is no clear definition of "air quality positive or neutral"	The GLA Sustainable Design and Construction SPD sets out the emissions benchmarks for a range of use classes to be neutral in both Appendix 5 (buildings), and 6 (transport). Supporting paragraph 6.7.31 of the Local Plan identifies that in order to qualify as Air Quality Positive, development not only has to be zero carbon, but also contribute toward a progressive reduction in emissions. This is also defined in the Mayor's Air Quality Positive SPD which identifies best practice approaches to help deliver air quality positive development. This is currently at draft stage, but once adopted, will help guide developers in delivering air quality positive development in accordance with Local Plan policy BSUI2.	No change.
Miscellaneous						
Appendix 4 8.4.1	MiM235		Transport for London (Spatial Planning) (MMR_23)	Object to LB Brent's lack of inclusion of modification as previously agreed with TfL to amend: "Parking standards for B1a uses in outer London as set out in the London Plan policy T6.2 apply to all B1 uses in Brent. For office development south of the Dudding Hill Line Inner London standards will apply."	Agreed, this omission was a mistake and should be made.	Amend MiM235 to: "Parking standards for Class E(g)(i) or B1a uses <u>in outer London</u> as set out in the London Plan policy T6.2 apply <u>to all Class E(g) uses or B1 uses</u> in Brent. <u>For office development south of the Dudding Hill Line Inner London standards will apply.</u> For other employment uses in the B and Class E(g)(ii) and Class E(g)(iii) MiM235 use class or closely related sui generis uses, the following standards, as detailed in Table 1, should be applied. The employment areas in Brent have significant variations in levels of access to public transport and other individual characteristics. A distinction is made between areas of the borough to the north and the south of the Dudding Hill railway line as this broadly reflects variations in public transport provision. 8.4.2 The provision of parking in new

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						<i>developments below the standards set out in the table is encouraged (see car free/car capped section). LOCATION DEFINITION MAXIMUM PARKING STANDARD Inner Brent South-east of Dudding Hill railway line 1 space per 800m² gross floor space Outer Brent North-west of Dudding Hill railway line 1 space per 200m² gross floor space Table 1 – Employment Maximum Parking Standards"</i>
Miscellaneous	N/A		Canal and River Trust (MMR_1)	No soundness concerns.	Noted	No change.
Miscellaneous	Map Mod 5		V Fund Ltd (MMR_5)	Area north of Fifth Way is used for storage and staff welfare facilities and has no Environmental Permit. Consider it should not be shown on the Policies Map as a safeguarded waste site.	The site functions as a whole and as such it is considered that the designation of this part of the site as safeguarded for waste purposes is appropriate. The designation derives from the Joint West London Waste Plan, rather than the new Local Plan. The safeguarded waste sites and boundaries will be reviewed when the Waste Plan is updated. Given the joint approach to meeting West London's waste apportionment it is considered this is the most appropriate place to do so rather than through the Brent Local Plan.	No change.
Miscellaneous	Map Mod 26		V Fund Ltd (MMR_5)	Support the site allocation BCSA9 being within the boundary of the tall buildings zone where up to 102 metres high would be appropriate.	Whilst this is the case, as the site is on the edge of a Tall Buildings Zone and also potentially affects views of the stadium arch from the Metropolitan line, these factors will need to be suitably addressed in height and massing.	No change.
Miscellaneous	Map Mod 32		IKEA Properties Investment Ltd (MMR_9)	IKEA's inclusion within SIL was not supported by any evidence and its removal to be replaced as unallocated 'white' land is sound.	Noted.	No change.
Miscellaneous	Map Mod 27		Kilburn Neighbourhood Forum (MMR_10)	<p>Character & Place-making</p> <p>Tall Buildings Zone inconsistent with the site allocation policy or Core Strategy</p> <p>CP5 Placemaking - particularly in relation to consideration of the heritage of the area.</p> <p>MM3 4.1.2d requires that Tall Buildings should "add quality to and complement Brent's character and sense of place".</p> <p>Core Strategy 5.6.10 includes Kilburn as 'a place which celebrates its historic character and cultural attractions focussed around the vibrant town centre..'. Whilst there is potential for some residential in place of the disused clinic building, it must comply with Brent's CP5 policy.</p> <p>As well as being out of character with surroundings, another tall building will remove green space, mature trees and amenity space for residents of a well established, settled estate, where residents have taken measures to secure community cohesion and reduce crime. Over-development puts residents' health at risk, given the Covid context showing the importance of open space and the impact of the poor air quality along the High Road.</p> <p>Design</p> <p>MM77 notes the Brondesbury Road Conservation area adjacent to Kilburn Square</p>	CP5 is a material consideration for any current application, but will be superseded by policies in the draft Local Plan. Nevertheless, it is accepted that an area's heritage and character is an important consideration in the design and location of major development and tall buildings. The Tall Buildings Strategy does take these factors into account when considering the potential appropriateness of identification of a Tall Buildings Zone where tall buildings are considered acceptable in principle. Whilst the surrounding area does contain designated and non-designated heritage assets, that in the Tall Buildings Zone selection criteria do not make it a priority location for Tall Buildings, the site allocation already contains a tower. The existing tower is part of the "character, setting and form and scale of surrounding buildings" which the site allocation policy sets out need to be considered, as well as the	No change.

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
				<p>and states "Development should integrate well with the surrounding context and consider character, setting and the form and scale of surrounding buildings". The Tall building policy states: "...heights should be consistent with the general buildings heights shown in the policies map and stepping down towards the Zone's edge..... In all cases the tall buildings must be shown to be positive additions to the skyline that would enhance the overall character of the area....of exceptional design quality, consistent with London Plan Policy requirements in showing how they positively address their visual, functional, environmental and cumulative impacts." These requirements cannot be met with the addition of a new tower here.</p> <p>So Map Mod 27 should be deleted.</p>	<p>wider surrounding area which has recognised conservation area status or emerging status as a heritage asset. In the context of lack of flexibility within BD2 for sites not identified within the Local Plan as suitable for tall buildings, the Council however also needs to take account of the benefits that the additional volume of homes (in this case social rent homes for which there is a desperate need within the borough) which can be accommodated on site that could now make the site suitable for identification in accordance with policy BD2. It is not only the Council's opinion that the site can accommodate a tall building with less than substantial harm to the character of the designated heritage assets adjacent, but the scheme has also been subject to Design Council design panel review and the principle of an additional tall building in the square regarded as acceptable. The design of any tall building will have to be of very high quality and as such will have the potential to add quality to and complement Brent's character and sense of place. The proposal will have a mid rise scheme fronting Brondesbury Road which will be sympathetic in scale and design to the adjacent buildings on that street, as has occurred with recent infill on other parts of the estate and also limit views of tower buildings behind, whilst in the longer term, the same is likely to be true of the wider site allocation's frontage along Kilburn High Road as proposed by the site allocation. Further analysis of the appropriate height and its acceptability related to massing, design and impacts on the locality can be taken at planning application stage. However, it is considered that the Map Modification 27 is appropriate in identifying that in principle the site is acceptable for a small cluster of tall buildings.</p>	
Miscellaneous	Map Mod 27		Kilburn Village RA, BEST, QPARA and BRAT (MMR_11)	<p>To designate Kilburn Square is a ridiculous mis-reading of the thrust of the MM94 Tall Buildings policy, which explicitly envisages clusters of Tall Buildings. On the really small footprint there is theoretically room for one tall building, and no scope for the prescribed stepping down...in no way can that constitute a cluster or a Zone. MM3 requires Tall Buildings to "add quality to and complement Brent's character and sense of place". MM77 BSESA20 Design Principles (p222) notes the adjacent Brondesbury Road Conservation Area and states "Development should integrate well with the surrounding context and consider character, setting and the form and scale of surrounding buildings". Brent has draft housing plans for a new 17-storey tower on the Kilburn Square footprint. KVRA strongly contends that such a building would fail all three policy tests. The existing 17-storey tower of over 30 years is a skyscape anomaly for the surrounding area, it would not be approved today. No Heritage or Urban Design report in has been proposed in support of this proposed new clause; nor evidence of potential compliance with the Climate Emergency strategy or other environmental impacts; nor of consultation with the neighbouring Borough of</p>	<p>The Tall Buildings Strategy started from the perspective of identifying clusters appropriate for tall buildings, which is the Council's preferred strategy approach. Nevertheless, it was envisaged that there would be some flexibility within policy BD2 as previously set out in the policy justification to account for considering smaller individual sites on their merits as the Council could not predict all opportunities that might become available over the lifetime of the Plan. Due to the Secretary of State's direction on London Plan Policy D9 this flexibility is no longer available and requires suitable sites to all be identified in Local Plans. It is agreed that the existing tower is an anomaly, but nevertheless it does exist and has changed the townscape in this part of Brent. It is against this backdrop that the</p>	No change.

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				<p>Camden on a Tall Building zone. Suggestions by Brent's New Council Homes (NCH) team that a second tower would create a Kilburn "Landmark" and bring desirable "symmetry" with the (not even matching) existing tower are absurd. In July 2021, NCH held pre-engagement with KVRA and neighbouring RAs; the proposal for a second 17-storey tower was unanimously rejected as not being consistent with the surrounding context. With residents on the KS estate itself, an extensive engagement process by independent advisors Source Partnership is nearing completion. We are confident its conclusions will show negligible support for a new Tall Building. A petition launched by a KVRA member, rejecting a new Tower, has over 800 signatures. Clearly the current residents and neighbours of the small Kilburn Square site roundly reject the proposition and the Zone should be deleted. This representation is also supported by the Chairs of neighbouring named residents associations identified. Delete Map Mod 27.</p>	<p>appropriateness of an additional tower must be assessed as identified in BSESA20. The existing tower is part of the "character, setting and form and scale of surrounding buildings" which the site allocation policy sets out need to be considered, as well as the wider surrounding area which has recognised conservation area status or emerging status as a heritage asset. The Council however also needs to take account of the benefits that the additional volume of homes (in this case social rent homes for which there is a desperate need within the borough) which can be accommodated on site. It is not only the Council's opinion that the site can accommodate a tall building with less than substantial harm to the character of the designated heritage assets adjacent, but the scheme has also been subject to Design Council design panel review and the principle of an additional tall building in the square regarded as acceptable. The proposal will have a mid rise scheme fronting Brondesbury Road which will be sympathetic in scale and design to the adjacent buildings on that street and also limit views of tower buildings behind, whilst in the longer term, the same is likely to be true of the wider site allocation's frontage along Kilburn High Road. Further analysis of the appropriate height and its acceptability related to massing, design and impacts on the locality can be taken at planning application stage. It is clear that there is significant opposition to an additional tower through its engagement with the residents and the Council's housing team will need to consider how it best takes into account representations received in adapting its scheme to one which will gain better resident acceptability. The identification of Kilburn Square as a Tall Buildings Zone was discussed with Camden officers at a regular duty to co-operate meeting and no representation on this matter was received from Camden on this matter.</p>	
Miscellaneous	Map Mod 27		Resident (MMR_14)	<p>MM3 requires Tall Buildings to "add quality to and complement Brent's character and sense of place". MM77 BSESA20 Design Principles (p222) notes the adjacent Brondesbury Road Conservation Area and states "Development should integrate well with the surrounding context and consider character, setting and the form and scale of surrounding buildings". Brent has draft housing plans for a new 17-storey tower on the Kilburn Square estate. Kilburn Square residents have strongly objected contending that such a building would fail the policy and tests. The existing 17-storey tower of over 50 years has caused problems including wind tunnelling. It is an anomaly for the surrounding area, it would not be approved today. Suggestions by Brent's New Council Homes (NCH) team that a second tower would create a Kilburn "Landmark" and bring desirable "symmetry" with the (not even matching) existing tower are absurd. It will only bring doubling of wind effects and increase crime due to proximity to the High Road with all the problems that brings. Nearly all Kilburn social housing towers in Kilburn have</p>	<p>It is agreed that the existing tower is an anomaly, but nevertheless it does exist and has changed the townscape in this part of Brent. It is against this backdrop that the appropriateness of an additional tower must be assessed as identified in BSESA20. The existing tower is part of the "character, setting and form and scale of surrounding buildings" which the site allocation policy sets out need to be considered, as well as the wider surrounding area which has recognised conservation area status or emerging status as a heritage asset. The Council however also needs to take account of the benefits that the additional volume of homes (in this case social rent homes for which there is a desperate need</p>	No change.

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
				<p>been pulled down because of crime and anti-social behaviour. No Heritage or Urban Design report has been proposed in support of this proposed new clause; nor evidence of potential compliance with the Climate Emergency strategy or other environmental impacts. Has the neighbouring Borough of Camden been consulted on a Tall Building zone. Kilburn Square Housing Coop who have managed the estate since 1994, was set up by residents due to crime coming into the estate from the high road. Residents reduced crime, making it a community and safer place to live. Residents are totally opposed and have rejected a second tower block on the estate. We do not want to live surrounded by more 17 storey tower blocks and problems they will bring. Please do not design problems back onto us at Kilburn Square estate. Remove Map Mod 27.</p>	<p>within the borough) which can be accommodated on site. It is not only the Council's opinion that the site can accommodate a tall building with less than substantial harm to the character of the designated heritage assets adjacent, but the scheme has also been subject to Design Council design panel review and the principle of an additional tall building in the square regarded as acceptable. The proposal will have a mid rise scheme fronting Brondesbury Road which will be sympathetic in scale and design to the adjacent buildings on that street and also limit views of tower buildings behind, whilst in the longer term, the same is likely to be true of the wider site allocation's frontage along Kilburn High Road. Further analysis of the appropriate height and its acceptability related to massing, design and impacts on the locality can be taken at planning application stage. The impact of wind from the towers and suitable mechanisms if necessary for mitigating its impact to acceptable levels can be considered as part of the detailed application scheme. The design of the development can satisfactorily address potential crime. Many aspects of design of municipal estates that have contributed to crime, such as poor overlooking and public access to what are essentially shared residents' facilities are now better controlled through modern day security systems and a clear delineation between public and private spaces. The strategy for security in the new development will not be detrimental to the improvements to the security of the wider estate that have occurred over the last 25 years. The majority of towers that have and will be demolished in South Kilburn are due to construction and design inadequacies which mean that it will be uneconomic to invest in those properties to bring them up to decent homes standards. They are also an ineffective use of land which can accommodate many more homes, that will also follow good urban design principles that will assist in reducing the incidences of crime compared to the poor layouts that existed previously. Crime within the towers that remain prior to demolition has been reduced significantly compared to many years ago through use of effective security mechanisms that limit access to communal areas to residents only. The identification of Kilburn Square as a Tall Buildings Zone was discussed with Camden officers at a regular duty to co-operate meeting and no representation on this matter was received from Camden on this matter.</p>	

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
Miscellaneous	Map Mod 20		Resident (MMR_14)	Neasden is predominantly suburban two storey housing. Map Mod 20 suggesting buildings up to 60 metres high will be appropriate contradicts Brent's SPD1 "In the areas of Brent that are predominantly suburban in character, new tall buildings are unlikely to be appropriate" and Core Strategy CP17: Protecting and enhancing the suburban character of Brent. Increased home working and the exodus of London's EU citizens creates the risk of empty and entirely unaffordable tower blocks. London's future should be resident and not developer led. Delete Map Mod 20.	Whilst this statement is in SPD1, earlier in the document it identifies under Principle 3.1 a) 'Sites appropriate for tall buildings' that sets out the Council's approach in identifying areas appropriate for tall buildings, Neasden Stations' Growth Area is such an area. The Core Strategy's policy approach reflects a housing target that is less than half of that which the current London Plan requires from the borough. In this context the Council has had to make some difficult choices about how it addresses this requirement. The preferred option is to focus the most growth in a number of smaller areas, which ultimately will result in less change in other parts of the borough compared to spreading out growth in a more dispersed manner. Notwithstanding the impact of Covid and Brexit, London's population is still predicted to grow significantly and the current level of homes to be delivered in the London Plan represents only 2/3rds of that required on an annual basis according to Government's standard housing need methodology.	No change.
Miscellaneous	Map Mod 18	Map Mod 19, Map Mod 20, Map Mod 21, Map Mod 22, Map Mod 23, Map Mod 24, Map Mod 25, Map Mod 26 and Map Mod 27	Resident (MMR_16)	The Tall Building Zones do not make provision for the likely overloading of sewage and likely restrictions of water supply to support the high intensity developments. It creates sky ghettos - families want to live within communities. Services in the borough such as healthcare and transport cannot accommodate this increase in households. The council are ignoring local people's planning representations and trying to maximise council tax receipts. The Zones ignore recent flooding in London and the climate emergency, which provide warning about high density living and the lack of green space. Additional provision of greenspace would improve air quality and absorb rainwater for existing residents. These objections apply to all Tall Buildings Zones and as such acceptable heights in each should be reduced by 50%.	Discussions have occurred with both Affinity and Thames Water who are both aware of projected development trends enabled by the Local Plan. A significant proportion of London's population originate from overseas where high density high rise development is prevalent in most large urban communities, as such many families will be used to living in high rise buildings. The Council has engaged with healthcare and transport providers who are aware of the volume of development proposed and have set out additional infrastructure requirements factored into the Council's infrastructure delivery plan. The Council has to balance local people's views with development targets and planning policies within the London Plan and national policy. Planning policy is not driven by the Council's likely council tax base. The zones do not ignore the risk of flooding. The climate emergency has implications for all forms of urban development, not just high rise. It does not remove the Council's need to be consistent with higher tier development targets. The Council's policies in requiring an urban greening factor to be met, improved biodiversity, air quality neutral/positive development and seeking greenfield run-off rates for surface water in most cases will result in betterment compared to the existing brownfield site's characteristics. Due to limitations on Council funds it will not be possible to provide additional greenspace without new development. Reducing tall building heights when	No change.

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
					they would otherwise be acceptable will divert dwelling needs elsewhere in the borough, for which additional sites will need to be found.	
Miscellaneous	Map Mod 27		Resident (MMR_18)	No coherent case made. Clearly introduced to allow the Council's highly damaging proposal for a second 17-storey tower. The estate is close to but not part of the Kilburn High Road mini-town centre. It works well as it is. So far few, if any, of the consequences at ground level of building 17 storeys high, such as play areas, car parking or access for services have been addressed.	It is agreed that the inclusion of a Tall Buildings Zone in this location is in response to the lack of flexibility resulting from modifications to policy BD2 that were required for it to be in general conformity with London Plan Policy D9 Tall Buildings, following Secretary of State directions for its modification. Due to modifications to D9 only sites identified in Local Plans will be considered acceptable for tall buildings. Notwithstanding the views of residents and without prejudice to the forthcoming determination of the planning application that might come before the Council, the principle of a tall building in this location has been considered and found to be appropriate by an independent Design Council design review panel. The Council has to not only consider the needs of its existing tenants and residents, but also those without a home, or who cannot afford to live in a home of their choice and has to maximise the use of its property assets to provide for those in need. The consequences of the development at ground level can be appropriately addressed through the application process. The development site is a brownfield redevelopment, which in such a high PTAL area is likely to be car-free or car-lite. The development provides a substantial opportunity to enable significant improvements through associated cross-subsidy from development to the public realm/ residents' amenity space of this part of the estate, which is typical of 1960s onwards development of being far too heavily dominated by vehicle parking spaces or circulation routes and poorly designed public realm.	No change.
Miscellaneous	MM9	MM11-17	Thames Water (MMR_28)	Text as regards water/ wastewater infrastructure is confusing. References that Thames Water have raised concerns for a number of sites which are within the Affinity Water service area. Where Thames Water is the service provider, there may be a number of concerns, however, these may change over time and will be dependent on the resultant development. For these sites, the site allocation text may be revised to read: <u>Development has the potential to impact on local water and wastewater networks. Developers should engage with the relevant providers prior to any application being submitted to discuss infrastructure requirements and identify whether any necessary network upgrades area necessary. Where required a housing and infrastructure phasing plan should be prepared to ensure essential infrastructure is delivered prior to the phase of development creating identified additional capacity requirements.</u>	It is accepted that it appears that for some allocations a generic approach has been taken to each site allocation which appears to have not sufficiently taken account of the subtleties of the responses around the ability of the waste water network to accommodate development provided by Thames Water at regulation 19 stage for individual allocations and as such each should be amended with the appropriate advice for each allocation.	Amend MM9,MM84, MM85, MM86, MM87, MM89, MM90, MM91 to: "Thames Water has indicated the local <u>waste</u> water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to <u>may</u> be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure <u>where required</u> essential infrastructure is delivered prior to the development creating identified additional capacity requirements.Amend MM10, MM11,

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
						<p>MM12, MM13, MM14, MM15, MM16, MM17, MM18, MM19, MM20 to: "Thames Water has indicated the local <u>waste</u> water network capacity in this area may be <u>is likely</u> unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure <u>where required</u> essential infrastructure is delivered prior to the development creating identified additional capacity requirements.MM30, MM31, MM68, MM70 to: "Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development, and that local upgrades to the wastewater network are likely to be required...."MM37, MM43, MM75, MM88 to: " Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree <u>if required</u> a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to being required to meet additional demands created through the development."MM48, MM63, MM64, MM67, MM71 MM74 to: "Thames Water has indicated the water <u>supply and wastewater</u> network capacity in this area may be unable to support the demand anticipated from this development.MM49, MM51 to: "Thames Water has indicated the water <u>supply</u> network capacity in this area may be unable to support the demand anticipated from this development."MM58, MM60, MM61 to: "Thames Water has indicated the water network capacity</p>

Chapter	Mod Ref	Mod Ref2	Name/Organisation/ Rep Reference Number	Summary	Officer Response	Proposed Change
						<i>in this area may be unable to support the demand anticipated from this development, and</i> upgrades to the wastewater network are likely to be required...."MM72: "When further information on the scale of development is available Thames Water will need to be engaged to establish impact on water supply network and water treatment infrastructure at the earliest opportunity to agree if required a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. MM73: "Thames Water has indicated the scale of development could require upgrades to water supply capacity and it is likely to require upgrades to the wastewater network. <i>When further information on the scale of development is available</i> Thames Water will need to be engaged to establish impact on water supply network and water treatment infrastructure at the earliest opportunity to agree <i>if required</i> a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."
Miscellaneous			Brent Cycling Campaign (MMR_34)	Good references to car free as starting principle for developments with high PTAL in some modifications. However, these are not universal.	Support welcomed. All developments will be subject to this approach, as identified in the overarching policy BT2. This will be considered in accordance with the parking standards set out in appendix 4 of the Local Plan. Where developments cannot come forward car free due to limited public transport infrastructure, their quantum of parking provided will be minimised as far as is practicable. This needs to consider the impact of on street parking in currently non controlled parking areas, and people's ability to meet their day to day needs.	No change.
Miscellaneous	MM101	MiM137	Avison Young (MMR_36)	Disagree with the retention of developments between 5-9 dwellings being required to make financial contributions for the provision of affordable housing off-site. It conflicts with para. 64 of the NPPF, which identifies provision of affordable housing should not be sought for residential developments that are not major developments. Small site developments have complications with providing on-site affordable housing and payments in lieu given the small	The reference to small sites affordable housing contributions is not identified as a main modification to policy BH5. This representation should have been made at regulation 19 stage. Nevertheless, the Council considers that the approach of seeking a financial contribution is justified. The national policy	No change.

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				<p>numbers of dwellings involved. There are also difficulties in finding registered providers to take on small numbers of units involved and it draws out the planning process. As a result of the London Plan examination the inspectors deleted the requirement for small sites affordable housing contributions from the London Plan. Reference is made to an affordable housing commuted sum calculator to be made available on the Council's website. The Council has commissioned a consultant to produce the calculator, with the intention of incorporating it in a Planning Obligations SPD likely to be subject to consultation in early 2022. This provides a gap period from when the plan will be adopted until the SPD is available. As indicated in the Lambeth Local Plan examination, the Inspector considered the significant viability issues with smaller sites, which is further supported by evidence from Lichfield's, 'Small-sites, unlocking housing delivery' as well as lack of compliance with national planning policy. Delete small sites affordable housing contribution requirement from BH5.</p>	<p>paragraph 64 focuses states 'should' rather than 'must' and the policy is not requiring a specific provision of a percentage of units either on or off-site but is seeking an appropriate financial contribution in lieu. There is a significant need for additional affordable homes which will not be met from provision of affordable homes solely in association with major developments. Viability evidence submitted to the examination in support of the policy indicates it will not place an unviable burden on non-major residential developments, particularly those in the 5-9 dwellings range. The Council understands the importance of small sites in meeting its housing requirement target. It does not wish to slow down determination times and delivery by entering into a protracted negotiation with site owners/ developers on viability. To this end it will be seeking a simple low level affordable financial contribution likely to be achievable on all sites (possibly related to smaller geographies than the whole borough to reflect variations in property values) related to the size of the number of homes. The consultants work on this will be complete by the end of September at which specific indications of amounts can be given, in advance of its incorporation in the Planning Obligations SPD draft for consultation likely in January 2022 if requested by applicants.</p>	
Miscellaneous	Map Mod 18	Map Mod 19, Map Mod 20, Map Mod 21, Map Mod 22, Map Mod 24, Map Mod 25, Map Mod 26, Map Mod 27, map mod 28 map mod 29	Avison Young (MMR_36)	<p>The Tall Buildings Strategy, October 2019 also recommends building heights in storeys. The Policies Map gives only indicative heights in metres as maximum heights. These are far too restrictive. They do not account for taller floor to ceiling heights of both residential (typically at least 3.5m in height) and employment/ office (light industrial floor to ceiling heights are typically 4.5m in height, whilst office floor to ceiling heights are typically 4m in height). It should also make reference to storeys. In addition, all policy map references to height should be "Approximately Xm in height".</p>	<p>The storeys identified as appropriate maximums in the Tall Building Strategy were a proxy based on an average 3 metres floor to floor height for a residential development. It is accepted that for residential schemes there might be some deviation away from 3 metres, particularly with the London Plan seeking 2.5 metre minimum floor to ceiling heights, which could reasonably push this figure up to 3.3 metres. Also it is agreed ground floor commercial elements may be much taller, potentially incorporating a double height space at ground floor and having higher upper floor to floor distances to incorporate floor and ceiling services. Notwithstanding this, the height of 3 metres was the assumption used when arriving at appropriate storeys in the tall building strategy, as per paragraph 3.4. The number of storeys identified on this basis was essentially used to allow non-professionals to understand what the scale of appropriate buildings would be. Nevertheless, for the purposes of analysis it was height in metres that was essentially considered in 3d modelling and taken from LIDAR data of existing building heights. The use of metres is considered to be clearer for the reason of the variability of storey heights. These heights have been</p>	No change.

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					arrived at in accordance with the considerations outlined in policy D9 of the London Plan. As per the response to the respondents representation on MM94, it is considered that the policy wording provides sufficient flexibility to allow to go higher where this can be justified.	
Miscellaneous	MapMod 1	Map Mod 2, Map Mod 3, Map Mod 4 and Map Mod 5	GLA/Mayor (MMR_37)	Welcome clear identification of waste sites in line with London Plan Policy SI 9	Noted	No change.
Miscellaneous	MapMod 11		GLA/Mayor (MMR_37)	Welcome site's removal. Introduction of non-industrial uses within SIL is inconsistent with London Plan Policy E7.	Noted	No change.
Miscellaneous	MapMod 32		GLA/Mayor (MMR_37)	The intention to release a large portion of the Wembley SIL has only now been made clear. It does provide a realistic opportunity for strategic industrial development. re-provision of this SIL capacity elsewhere should be explained clearly with appropriate evidence in line with London Plan Policy E7.	This portion of Wembley SIL has been in retail use for about 30 years. As such, notwithstanding its long term designation, the principle of non-industrial uses for this part has been long established. Notwithstanding its potential in locational terms as being appropriate for industrial purposes in the future, neither site owner indicated that they would be likely to propose this use for the sites should they become available for development. As part of the examination process, to make the Plan sound, the Council was encouraged by the Inspectors to propose removing the SIL designation to make the plan sound. As the GLA is aware, the Council does not have significant additional areas within its boundaries other than that which is currently identified to accommodate SIL. The Council is, however, taking a proactive approach toward the delivery of new industrial floorspace through its suite of employment land policies which are in accordance with London Plan policy. This includes the intensification of existing SIL, LSIS and Local Employment sites. The Brent industrial Land Audit together with evidence provided by OPDC identifies a theoretical potential for significant uplifts in industrial floorspace capacity, should the market wish to respond to opportunities provided by the positive policies related to the intensification of existing designated industrial land in the respective development plans.	No change.
Miscellaneous	Map Mod 30		Sudbury Town Residents Association (MMR_40)	The 'Intensification Corridors Background Report' represents a new piece of evidence/ strategy which was not previously made available at reg's 18/19 stages. This is therefore outside the scope of the modifications consultation which is to propose modifications to make existing text sound. This document regards an approach which seeks to intensify land in well connected areas for the replacement of existing low density housing with higher density flats, up to 5 storeys. This includes Station Approach and Barham Close in Sudbury Town. Brent residents are not aware of this potentially damaging approach.	Noted. The document produced was provided in response to an Action identified by the Inspectors to further justify the Council's intended approach and move away from property boundaries for the intensification corridors to a more general approach of appropriate stretches of frontage along corridors. This approach will see current low density detached/ semi detached dwellings in well connected and sustainable places, intensified to deliver a greater	No change.

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					quantum of higher density development which provides a more effective use of land, consistent with NPPF, London Plan and Brent Local Plan priorities of intensifying land use to meet housing requirements. This will help meet the needs of future growth within the borough, and bridge the gap between housing delivered, and the objectively assessed need particularly from small infill sites. Identifying suitable locations for this development will deliver more sustainable development rather than becoming more reliant on development in otherwise less sustainable locations. The proposed developments will still need to adhere closely to the other policies within the plan, including design policies which will ensure they are sympathetic to the local character of the area despite their increased density.	
Miscellaneous	Revised SCI		Sudbury Town Residents Association (MMR_40)	During examination the Inspector highlighted the need for infrastructure requirements to be projected in tandem with growth supporting policies. For transport, this document is the Brent Long Term Transport Strategy (LTTS). Brent have produced a new LTTS which is awaiting cabinet approval. STRA need to consider the impact of this document upon the policies within the local plan, given their need to be considered in tandem.	Noted. The emerging LTTS takes account of policies in the Local Plan and is also informed by policies in the London Plan and the Mayor's transport strategy. The Local Plan has also been informed by these two documents as well as having input from the Council's transport planning policy team who are producing the new LTTS. It is therefore very unlikely that the two documents will be inconsistent and will not vary to such an extent that it will have a fundamental impact on the content of the Local Plan, transport strategy for the borough or infrastructure projects that can be identified. Given the length of time taken to prepare Local Plans and other strategies it is inevitable there all plans will not be updated simultaneously. There is no need to wait for this updated LTTS to be adopted to progress with the adoption (if it can be supported by the Inspectors' final report) of the Brent Local Plan.	No change.
Miscellaneous	Map Mod 30		Sudbury Town Residents Association (MMR_40)	The 'Intensification corridors Background Report' considers the A406 and A404 to be comparable. The A406 is the North Circular Road, and represents a strategic ring road around London enabling long distance travel. The A404 is less significant in size, width and usage and is not comparable. Paragraph 11.2 of this same report considered the A406 unsuitable for Intensification Corridors due to low air quality. This does not consider the impact of the ULEZ which will improve air quality, making it more suitable for designation as an Intensification Corridor. The Council do however consider St. Raphael's estate and Ikea, which are both adjacent to the North Circular, to be appropriate for development, which is not identified in the same background report.	Noted. The Intensification Corridors Background Report does not make reference to the A404 and A406 being comparable. It is accepted that the A406 is the more significant thoroughfare. As such, and as identified by the representor, it has been considered inappropriate for designation as an Intensification Corridor, for reasons such as noise and air pollution and general safety. The referred to paragraph, in reference to the North Circular (A406) road, notes the following: 'The limited larger site allocations in the Local Plan along this main road have better potential to adequately address these factors as there is greater scope for positioning development away from the carriageway.' Larger and deeper sites, together with their greater potential heights which allows for development to be further located away from environmental factors such as pollution and noise, such as those of St. Raphaels estate, Wembley	No change.

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					Point/Argenta and Bridge Park. With regards to existing dwellings along A406 similar in character to those identified for intensification corridors elsewhere, these more tightly abut the existing road network, thus are considered to preclude such potential for intensification identified on the larger sites due to likely inappropriate impacts on prospective occupants.	
Miscellaneous	Map Mod 30		Sudbury Town Residents Association (MMR_40)	The Intensifications Corridor Background Report uses the term Primary Movement Corridor on pages 10 and 11. This term lacks definition. The documents definition of A roads on page 22 as locations appropriate for intensification is vague and inappropriate given differences between A roads. For example, the A4005 in Sudbury Town is not comparative to the A5. There is also no mention of road widths or level of usage. The use of PTAL is also misleading as the report acknowledges, with PTAL dropping significantly within 800m of a station. As such, these criteria are inappropriate and cannot precisely identify locations suitable for intensification within the borough.	Noted. Reference to Primary Movement Corridors is for ease of reading only. This does not impact upon the criteria for identifying the Intensification Corridors as outlined within Paragraph 9.1 of the Intensification Corridor Background Report. The list of A roads within Brent on page 22 does not represent a definition. The definition of an A road is widely accepted, with their purpose being to facilitate high capacity and long distance travel at speed. It is accepted that the A roads within Brent differ and have different widths, patronage, and characters. To use the representors example, it is noted that the A5, which is the historic Watling Road, has a width of approximately 23m, whilst the A4005 in Sudbury has a width of approximately 40m. This is when measuring from building line to building line, as is the criteria for inclusion within the designation of Intensification Corridor. Again, the criteria listed in section 9.1 noted width as a determinant within the allocation of Intensification Corridors. As is PTAL, which only includes areas with relatively high scores (3+) within Intensification Corridors. This therefore takes into account the accepted fact that although a station is present, it doesn't necessarily mean it is accessible, or suitable in allowing for intensification, as has been noted by the representor. As such, when the criteria within section 9.1 of the aforementioned document are taken together, it is considered that the identification of Intensification Corridors for higher density residential development is appropriate.	No change.
Miscellaneous	Map Mod 30		Sudbury Town Residents Association (MMR_40)	The Intensification Corridors Background Report, para 7.4 suggests rear gardens are suitable for independent habitable homes. This is confirmed by recent application 21/2290 which granted the delivery of 3 new houses on rear gardens. Brent's SPD 2, states at paragraph 2.10 that outbuildings as habitable rooms are not permissible and should be single storey. The late introduction of new policies such as is being put forth within this document is not acceptable.	Noted. Rear gardens can be suitable for residential development, and are considered to be backland development. The referred to outbuildings within SPD2 are not specifically addressing C3 dwellings, as was granted approval on 21/2290. SPD 2 instead refers to additional outbuildings which are used as ancillary spaces to the primary residents. In these instances, it is accepted, and remains the case in emerging policy (BH12), that they are not to be permissible as dwellings/ habitable rooms.	No change.
Miscellaneous	Map Mod 30		Sudbury Town Residents	STRA has not yet provided a comprehensive response regarding the Action Ref_PHA_26_Intensification Corridors Background Report_Jan_2021 but examples to highlight that further work is required.	Noted. Regulations set out the minimum timescales for consultation on development plan documents, which usually are accompanied by relevant evidence	No change.

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			Association (MMR_40)		base documents. The Council has been consistent with these consultation periods. The decision as to whether late representations, or representations received which have not specifically been requested outside formal consultation periods, are considered is essentially a matter for the Inspectors examining the Plan to decide.	
Miscellaneous	MM123		Sudbury Town Residents Association (MMR_40)	The Brent Long Term Transport Strategy can no longer be relied upon due to the drafting of a new version awaiting cabinet approval. This may impact upon the designation of Intensification Corridors. STRA await an opportunity to comment upon this document which may impact upon the infrastructure requirements of the Plan.	Noted. See response to STRA representation on the LTTS. With regards to the location of Intensification Corridors, it is not considered likely that the Brent Long term Transport Strategy (LTTS) will have any bearing on their location. The LTTS will not change the location of A roads, or attributes which impact upon the criteria for Intensification Corridor Designation identified within paragraph 9.1 of the Intensification Corridor Background Report. The LTTS intends to improve transport within the borough, by seeking to reduce unnecessary use of private vehicles by encouraging more sustainable transport modes. The Intensification Corridors, being located within areas with good access to public transport, share this approach. As such, the LTTS and the Intensification Corridors are considered to be mutually supportive in helping the Council achieve its strategic aims of reducing unnecessary use of the private car, congestion and associated air quality issues.	No change.
	Statement of Community Involvement		Sudbury Town Residents Association (MMR_40)	Amendments to the new Statement of Community Involvement, in regards to Covid pandemic conditions, are significant and materially affect how the public will be consulted during non-pandemic times. This is also with regards to Neighbourhood Forums, for which STRA is. This effectively works to restrict community involvement in planning under the veil of Covid guidelines. This would go against the very core of the Localism Act 2010. These amendments are restrictive, and their arrival non-transparent and serve to disregard public opinion.	The changes to the SCI in relation to neighbourhood planning are not considered to be inappropriate and reflect updated regulations following amendments to the Localism Act 2011 that have occurred since the last SCI was produced in 2017. These give neighbourhood forums more influence on planning outcomes and clarity of what can be expected from the Council in supporting them than the 2017 SCI. The Council is willing to work with STRA to consider any specific points that it wants to raise in relation to the SCI contents and suggested wording changes. The Council however does not consider that this has any bearing on the content of the draft Brent Local Plan and associated proposed modifications.	No change.