



SCHEDULE OF ADDITIONAL NON-MAIN (MINOR) MODIFICATIONS OF DRAFT BRENT LOCAL PLAN SUBMITTED FOR EXAMINATION IN MARCH 2020
LONDON BOROUGH OF BRENT

This schedule contains all minor modifications to Brent Local Plan submission version.

All proposed modifications and their reference numbers supersede all previous versions proposed by the Council during the examination process.

The following format has been used to denote the modifications:

~~Strikethrough text~~ = text proposed for removal compared to submission version

Underline text = new text proposed for justification text compared to submission version

~~Strikethrough~~ or underline text = further minor modifications post examination modifications consultation that occurred from July-August 2021

Minor Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiMa	Title Page		<p><i>Amend title page:</i></p> <p><u>Brent Local Plan 2019-2041</u> <u>Regulation 19 Consultation</u> <u>Adopted February 2022</u>October 2019</p>	Reflects adoption
MiMb	Contents		<p><i>Update contents page with policies:</i></p> <p>5.1 Central <u>POLICY BP1 CENTRAL</u> <u>POLICY BCGA1 WEMBLEY GROWTH AREA</u> <u>SITE ALLOCATION POLICIES</u> <u>BCSA1 Asda/The Torch/Kwikfit</u> <u>BCSA2 Stadium Retail Park and Fountain Studios</u> <u>BCSA3 Brook Avenue</u> <u>BCSA4 Fifth Way/Euro Car Parts</u> <u>BCSA5 Olympic Office Centre</u> <u>BCSA6 Watkin Road</u> <u>BCSA7 Wembley Park Station (South)</u> <u>BCSA8 Wembley Retail Park</u> <u>BCSA9 First Way</u> <u>BCSA10 York House</u> <u>BCSA11 College of North West London Wembley</u> <u>BCSA12 Land to South of South Way</u> <u>BCSA20 Wembley Park Station (North)</u> <u>Other Site Allocations</u></p> <p>5.2 East <u>POLICY BP2 EAST</u> <u>POLICY BEGA1A NEASDEN STATIONS GROWTH AREA</u> <u>POLICY BEGA2A STAPLES CORNER GROWTH AREA</u></p>	To assist navigation

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			<p><u>SITE ALLOCATION POLICIES</u> <u>BEGA1: Neasden Stations Growth Area</u> <u>BEGA2: Staples Corner Growth Area</u> <u>BESA1: Coombe Road</u> <u>BESA2: Cricklewood Bus Depot Edgware Road</u> <u>Other Site Allocations</u></p> <p>5.3 North <u>POLICY BNGA1 BURNT OAK/ COLINDALE GROWTH AREA</u> <u>SITE ALLOCATION POLICIES</u> <u>BNSA1: Capitol Way Valley</u> <u>BNSA2: Colindale Retail Park, Multi-Storey Car Park and Southon House</u> <u>BNSA3: Honeypot Lane LSIS and Morrisons</u> <u>BNSA4: Former Mecca Bingo Site</u> <u>Other Site Allocations</u></p> <p>5.4 North West <u>POLICY BP4 NORTH WEST</u> <u>POLICY BNWGA1A NORTHWICK PARK GROWTH AREA</u> <u>SITE ALLOCATION POLICIES</u> <u>BNWGA1: Northwick Park Growth Area</u> <u>BNWSA1: Kenton Road Sainsbury's and Adjoining Land</u></p> <p>5.5 South <u>POLICY BP5 SOUTH</u> <u>POLICY BSGA1 CHURCH END GROWTH AREA</u> <u>SITE ALLOCATION POLICIES</u> <u>BSSA1: ASIATIC CARPETS</u> <u>BSSA2: B&M Home Store and Cobbold Industrial Estate</u> <u>BSSA3: Church End Local Centre</u> <u>BSSA4: Chapman's and Sapcote Industrial Estate</u> <u>BSSA5: Willesden Bus Depot</u></p>	

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			<p><u>BSSA6: Argenta House and Wembley Point</u> <u>BSSA7: Bridge Park and Unisys Building</u> <u>Other Site Allocations</u></p> <p>5.6 South East</p> <p><u>POLICY BP6 SOUTH EAST</u> <u>POLICY BSEGA1 SOUTH KILBURN GROWTH AREA</u> <u>SITE ALLOCATION POLICIES</u></p> <p><u>BSESA1: Austen</u> <u>BSESA2: Blake</u> <u>BSESA3: Carlton House</u> <u>BSESA4: Carlton Infant School</u> <u>BSESA5: Craik</u> <u>BSESA6: Crone & Zangwill</u> <u>BSESA7: Dickens</u> <u>BSESA8: Hereford House & Exeter Court</u> <u>BSESA9: Kilburn Park Junior School</u> <u>BSESA10: Neville & Winterley's</u> <u>BSESA11: Old Granville Open Space</u> <u>BSESA12: Wordsworth, Masefield and Part of South Kilburn Open Space</u> <u>BSESA13: John Ratcliffe House</u> <u>BSESA14: William Dunbar House and William Saville House</u> <u>BSESA15: UK Albanian Muslim Community and Cultural Centre</u> <u>BSESA16: OK Club</u> <u>BSESA17: Cricklewood Broadway Retail Park</u> <u>BSESA18: 245–289 Cricklewood Broadway and Hassop Road</u> <u>BSESA19: Gaumont State Cinema</u> <u>BSESA20: Kilburn Square</u> <u>BSESA21: Willesden Green Sainsbury's and Garages</u> <u>Other Site Allocations</u></p>	

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			<p>5.7 South West <u>POLICY BP7 SOUTH WEST</u> <u>POLICY BSWGA1 ALPERTON GROWTH AREA</u> <u>SITE ALLOCATION POLICIES</u> <u>BSWSA1: Alperton Industrial Sites</u> <u>BSWSA2: Sainsbury's Alperton</u> <u>BSWSA3 Atlip Road</u> <u>BSWSA4: Sunleigh Road</u> <u>BSWSA5: Abbey Industrial Estate</u> <u>BSWSA6: Beresford Avenue</u> <u>BSWSA7: Northfields</u> <u>BSWSA8: Wembley High Road</u> <u>BSWSA9: Former Copland School</u> <u>BSWSA10: Elm Road</u> <u>Other Site Allocations</u></p> <p>6 Themes 6.1 Design <u>POLICY BD1 LEADING THE WAY IN GOOD URBAN DESIGN</u> <u>POLICY BD2 TALL BUILDINGS</u> <u>POLICY BD3 BASEMENT DEVELOPMENT</u></p> <p>6.2 Housing <u>POLICY BH1 INCREASING HOUSING SUPPLY IN BRENT</u> <u>POLICY BH2 PRIORITY AREAS FOR ADDITIONAL HOUSING PROVISION WITHIN BRENT</u> <u>POLICY BH3 BUILD TO RENT</u> <u>POLICY BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT</u> <u>POLICY BH5 AFFORDABLE HOUSING</u> <u>POLICY BH6 HOUSING SIZE MIX</u></p>	

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			<p><u>POLICY BH7 ACCOMMODATION WITH SHARED FACILITIES OR ADDITIONAL SUPPORT</u> <u>POLICY BH8 SPECIALIST OLDER PERSONS HOUSING</u> <u>POLICY BH9 GYPSY AND TRAVELLER ACCOMMODATION</u> <u>POLICY BH10 RESISTING HOUSING LOSS</u> <u>POLICY BH11 CONVERSION OF FAMILY SIZED DWELLINGS</u> <u>POLICY BH12 RESIDENTIAL OUTBUILDINGS</u> <u>POLICY BH13 RESIDENTIAL AMENITY SPACE</u></p> <p>6.3 Social Infrastructure <u>POLICY BS11 SOCIAL INFRASTRUCTURE AND COMMUNITY FACILITIES</u></p> <p>6.4 Economy & Town Centres <u>POLICY BE1 ECONOMIC GROWTH AND EMPLOYMENT OPPORTUNITIES FOR ALL</u> <u>POLICY BE2 STRATEGIC INDUSTRIAL LOCATIONS (SIL) AND LOCALLY SIGNIFICANT INDUSTRIAL SITES (LSIS)</u> <u>POLICY BE3 LOCAL EMPLOYMENT SITES AND WORK-LIVE</u> <u>POLICY BE4 SUPPORTING STRONG CENTRES</u> <u>POLICY BE5 PROTECTING RETAIL IN TOWN CENTRES</u> <u>POLICY BE6 NEIGHBOURHOOD PARADES AND ISOLATED SHOP UNITS</u> <u>POLICY BE7 SHOP FRONT DESIGN AND FORECOURT TRADING</u> <u>POLICY BE8 MARKETS AND CAR BOOT SALES</u> <u>POLICY BE9 VISITOR ACCOMMODATION AND ATTRACTIONS</u></p>	

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			<p>6.5 Heritage and Culture <u>POLICY BHC1 BRENT'S HERITAGE ASSETS</u> <u>POLICY BHC2 NATIONAL STADIUM WEMBLEY</u> <u>POLICY BHC3 SUPPORTING BRENT'S CULTURE AND CREATIVE INDUSTRIES</u> <u>POLICY BHC4 BRENT'S NIGHT TIME ECONOMY</u> <u>POLICY BHC5 PUBLIC HOUSES</u></p> <p>6.6 Green Infrastructure and Natural Environment <u>POLICY BG11 GREEN AND BLUE INFRASTRUCTURE IN BRENT</u> <u>POLICY BG12 TREES AND WOODLANDS</u></p> <p>6.7 Sustainable Infrastructure <u>POLICY BSUI1 CREATING A RESILIENT AND EFFICIENT BRENT</u> <u>POLICY BSUI2 AIR QUALITY</u> <u>POLICY BSUI3 MANAGING FLOOD RISK</u> <u>POLICY BSUI4 ON-SITE WATER MANAGEMENT AND SURFACE WATER ATTENUATION</u></p> <p>6.8 Transport <u>POLICY BT1 SUSTAINABLE TRAVEL CHOICE</u> <u>POLICY BT2 PARKING AND CAR FREE DEVELOPMENT</u> <u>POLICY BT3 FREIGHT AND SERVICING</u> <u>POLICY BT4 FORMING AN ACCESS ON TO A ROAD</u></p> <p>7 Delivery and Monitoring 8 Appendices and Glossary</p>	
MiMc	Foreword		<p><i>Update:</i> ... The new Local Plan for Brent is now being drafted to help sets the vision for Brent's development. It will set out <u>includes</u> London Borough of Brent's policies towards housing, town centres, open space, employment,</p>	Reflected adopted status

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			<p>community facilities, the built and natural environment and transport – all of which contribute to making Brent a vibrant place to live and work....</p> <p>... The draft London Plan 2021 subject to examination earlier this year expects Brent to play its part in supporting London’s continuing growth to 2041 and beyond....</p> <p>Following public engagement in from 2017 to 2021 and 2018, this publication stage consultation continues the journey towards the adoption of the Local Plan. We we have taken account of the extensive number of comments received....</p> <p>... It is essential that the residents of Brent are involved in this process of setting the council’s planning policy. We encourage you to take this opportunity to participate in the process of shaping the future growth of the borough and the policies within the Plan. It is anticipated that the Plan will be adopted by the end of 2020.</p> <p>We look forward to meeting you at consultation events and receiving your views.</p> <p>The Plan has been subject to independent examination, found ‘sound’ subject to modifications and adopted by the Council....</p>	
MiMd	1 Consultation Overview	All	<p><i>Update:</i></p> <p>1.1 The council is working towards adopting a new Local Plan. The Local Plan is a Development</p>	Factual reflects adopted status

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			<p>Plan Document. All planning applications must be determined in accordance with the Development Plan unless there are significant reasons for not doing so. The Plan is therefore a very important document in shaping the future development of Brent. It runs to 2041, consistent with the London Plan that will be adopted in 2020 <u>2021</u>. The Local Plan will <u>provides</u> a locally specific spatial policy framework for planning and development for the areas of the borough where the council is the local planning authority as shown in Figure 1.</p> <p>Figure 1 Brent / OPDC Boundary</p> <p>1.2 ... OPDC's Local Plan deals with parts of the borough such as Willesden Junction and Park Royal. It is at a more advanced stage than the council's Local Plan being and is likely to be adopted in late 2019 <u>2022</u>.</p> <p>1.3 This consultation provides an opportunity to help shape the future of the borough. The Local Plan review will:</p> <ul style="list-style-type: none"> • Set out a long-term vision and objectives; • Provide a strategy for significant growth, delivering new homes, employment, facilities and 	

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			<p>infrastructure to meet the area's and London's needs; and</p> <ul style="list-style-type: none"> • Include policies to manage change whilst protecting and enhancing the area's built and natural environment. <p>1.4 This version of The Local Plan is a draft document specifically produced for public consultation. It takes account of comments received on the previous stage of consultation. The Plan has been subject to extensive consultation and various stages of production set out in Figure 2 that commenced in August 2017:</p> <ul style="list-style-type: none"> • <u>Issues and Options: Consultation August 2017- March 2018;</u> • Preferred Options; which was consulted upon from <u>Consultation</u> November 2018 to January 2019. • <u>Publication: October 2019-December 2019</u> • <u>Examination in Public Hearings September- October 2020 addressing Planning Inspectors' Matters, Issues and Questions</u> • <u>Proposed modifications: July 2021-August 2021</u> as part of the examination process. It is the version that the council wishes to adopt. It recognises however that it is likely that responses to this consultation will result in further proposed changes to the Plan before it is submitted for 	

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			<p>Examination. This is an opportunity for you to comment on and shape Local Plan policy.</p> <p>When and how to respond</p> <p>1.5 The council will be undertaking the Local Plan consultation in accordance with its Statement of Community Involvement adopted in July 2017. The Local Plan review consultation will run for a six-week period starting on Thursday 24th October 2019. The deadline for responses is 5pm on Thursday 5th December 2019.</p> <p>1.6 At this stage of the Plan comments should be related to the 'test of soundness' as set out in the National Planning Policy Framework. These are whether the Plan is "sound" in respect of being:</p> <p><u>Positively prepared</u> – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p><u>Justified</u> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p>	

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			<p>Effective — deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>Consistent with national policy — enabling the delivery of sustainable development in accordance with the policies in the Framework</p> <p>We would encourage you to provide your comments on the council's consultation website by completing the consultation questionnaire online at: www.brent.gov.uk/shapebrent This is the quickest way of replying. Alternatively, you can email us or send us your comments by post by using the addresses below. When responding by e-mail or post, please use the Local Plan Consultation Response Form. Please set out clearly the page number, paragraph, policy, figure or image your comment relates to.</p> <p>Email: planningstrategy@brent.gov.uk</p> <p>Post: Paul Lewin, Team Leader Planning Policy, Brent Council, Engineers' Way, Wembley, HA9 0FJ</p> <p>1.7 — Please note that responding means that we will automatically notify you of future Local Plan</p>	

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			<p>related consultations unless you request otherwise.</p> <p>1.8 All documents can be read and downloaded from: www.brent.gov.uk/shapebrent Paper copies of this draft Local Plan and supporting documents (excluding the research studies which would result in a significant amount of printing) are available to view during normal opening hours at the following locations:</p> <ul style="list-style-type: none"> • Willesden Green, 95 High Road, Willesden NW10 2SF • Wembley Library, Brent Civic Centre, Engineers Way, Wembley, HA9 0AF; • Kingsbury Library, 522-524 Kingsbury Road, Kingsbury, NW9 9HE • Kilburn Library, Salusbury Road, Kilburn NW6 6NN • Harlesden Library, Craven park Road, Harlesden, NW10 8SE; • Ealing Road Library, Coronet Parade, Ealing Road, Wembley HA0 4BA <p>1.9 The libraries also have access to the council's website to allow you to view all supporting documents and make comments.</p> <p>Drop-in to a public exhibition or workshop</p> <p>1.10 The council will also hold a number of events/ drop-in sessions within the borough to enable</p>	

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			<p>discussion and feedback of proposals in person. To find out about when these are happening please visit: www.brent.gov.uk/shapebrent</p> <p>What happens next?</p> <p>1.11 Planning regulations set out the key stages in the preparation of the new Brent Local Plan review as shown in Figure 2. This also shows where we are currently in this process. The policies in the Local Plan have been examined and found sound by independent planning inspectors appointed on the behalf of the Secretary of State. must be <u>They are considered as being</u> 'consistent' with the National Planning Policy Framework (NPPF) and in 'general conformity' with the London Plan. Figure 3 shows the relationships between the various levels of policy documents.</p> <p>1.12 All representations received to this Published Plan consultation will be considered by the council, summarised and published for information. These and any proposed further amendments to the Plan will be submitted to the Secretary of State for examination by an independent planning inspector. The inspector will determine if the submitted Plan meets the required legal and procedural requirements, and when judged against national planning policy requirements the strategy and policies are</p>	

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			<p>'sound'. Subject to the Plan being found sound, the council will then adopt it.</p> <p>1.13 All representations received on the Plan will be summarised and collated within a consultation statement to support the Local Plan at examination. From publication stage and beyond individual responses will be published online and also be publicly available and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by the council in line with the General Data Protection Regulation 2018.</p>	
MiMe	2 Introduction		<p><i>Amend:</i></p> <p><u>Why are we reviewing the Local Plan? The Development Plan</u></p> <p>2.1 Brent's existing Local <u>The Development Plan for Brent</u> comprises a number of documents. <u>It includes the London Plan 2021 and this document: the Brent Local Plan 2022</u> that have been produced by the council:</p> <ul style="list-style-type: none"> ● Core Strategy adopted 2010 ● Site Specific Allocations Document adopted 2011 ● Wembley Area Action Plan adopted 2015 and 	Factual - reflects adoption

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			<ul style="list-style-type: none"> • Development Management Policies Plan adopted 2016. <p>.....</p> <p>2.3 Figure 3 shows the relationship between layers of planning policy. In addition to the Development Plans, policies in the Plans are sometimes given more clarity on how they will be interpreted in Supplementary Planning Documents. <u>National policy, set out in the NPPF, informs the content of development plans. It is also a significant consideration when determining planning applications, particularly where it supersedes development plan policies.</u></p> <p>Figure 3 Planning Policy Hierarchy</p> <p>2.4 — Since the principal elements of the Plan were adopted (Core Strategy 2010, Site Allocations 2011), national planning policy and practice guidance has radically altered. There has been two fundamental changes in national policy, through the national planning policy framework. The most recent of these was in July 2018, with minor amendments in 2019.</p> <p>2.5 — There have also been two significant changes to the London Plan. The 2008 London Plan was superseded in 2011, and consolidated with alterations in 2016. Significantly the borough's</p>	

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			<p>housing target increased from 1065 to 1525 dwellings per year. The latest Draft London Plan December 2017 again proposes substantial additions; a target which is equivalent to 2915 dwellings per year from 2019/20 until 2028/29.</p> <p>2.6 — The borough, through the successful delivery of its Growth Areas in particular, has been able to accommodate the London Plan's more recent increases in dwelling numbers. It cannot continue to do so for the longer term, particularly if its target increases, without a radical review of its Local Plan. It is anticipated that the population will grow by 64,900 to 393,700 in the period to 2041. To accommodate this will require not only new homes, but approximately 30,300 new full time equivalent jobs to meet residents' needs, plus the associated improvements to social and physical infrastructure.</p> <p>2.7 — Whilst being ambitious about housing growth, the council has submitted representations that challenge the draft London Plan housing target. It does not consider it realistic for a variety of reasons. The council and this emerging Local Plan is planning for an increase above the current 1525 target. The amount of homes delivered will be maximised to that which can reasonably be achieved. This will balance housing delivery against other priorities and calls upon land, e.g.</p>	

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			<p>jobs, social infrastructure, open space and local heritage assets and character. The Local Plan review will consider other development needs and, where necessary, review and update current planning policies.</p> <p>Implications of having a draft London Plan moving to adoption</p> <p>2.8 — Brent's Local Plan should be in 'general conformity' with the London Plan. For the most part Brent supports the contents of the London Plan. Key exceptions are the housing numbers set, particularly related to small sites and the policy approach to industrial land within the borough. The council has objected to these elements of the London Plan. This Local Plan takes forward policies that are realistic and justifiable taking into account local circumstances. Should policies in the draft London Plan remain as is, then it might be necessary for the council to revise this Local Plan's contents in light of the London Plan that moves towards adoption.</p> <p>2.9 — This publication version of the Local Plan refers to a number of policies within the draft London Plan. It assumes these for the most part will be adopted in a form that is not very different to the draft London Plan modifications issued in</p>	

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			<p>response to the Examination process. Many of these policies provide detailed development management type criteria against which planning applications are assessed.</p> <p>Which existing policies will be superseded by this Local Plan review?</p> <p>2.10 — The review is proposing to replace many of the existing Local Plan policies. It seeks to simplify the Plan and make it more understandable. The Issues and Options consultation responses indicated support for replacing the four separate Brent Development Plan Documents set out in paragraph 2.1 with a single document. A schedule of the policies that will be superseded/ replaced and kept with or without amendments is set out in Appendix 1. In effect, it is some of the Development Management Policies that are being carried forward for incorporation into the new Local Plan with no or limited changes. The issues in other existing policies are:</p> <ul style="list-style-type: none"> a) either picked up in the London Plan; b) no longer considered to be of such importance that they warrant inclusion; or c) incorporated into new policies with significant wording changes. 	

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			<p>2.11 The weight that can be attached to the existing Local Plan compared to policies that emerge as part of the review will be dependent on a number of factors, including: the existing and proposed policy's consistency with national and London Plan policy; the level of support or objection to proposed policies and the stage that it is at within the adoption process. At this stage as policies within the draft Local Plan are in their early development, not yet subject to examination or a council resolution, it is considered that the weight that can be attached to them is likely to be limited in most cases. The Brent Local Plan 2022 replaced the following development plan documents previously adopted by the Council which have now been formally revoked:</p> <ul style="list-style-type: none"> • <u>Core Strategy adopted 2010</u> • <u>Site Specific Allocations Document adopted 2011</u> • <u>Wembley Area Action Plan adopted 2015 and</u> • <u>Development Management Policies Plan adopted 2016.</u> <p>Duty to co-operate and statements of common ground</p>	

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			<p>2.12 The Localism Act 2011 set out greater provisions to encourage public organisations and local councils to work together to plan properly for areas across borough boundaries. Consistent with this the council will produce evidence to show how it has <u>In producing this Plan, the Council has</u> conformed with the duty to co-operate, and It produced statements of common ground with neighbouring local planning authorities (Barnet, Ealing, Harrow, Hammersmith & Fulham, Kensington & Chelsea, City of Westminster and OPDC) throughout the various stages of the adoption of the Local Plan. <u>In addition, it also produced Statements of Common Ground with other organisations such as the Greater London Authority (representing the Mayor), Transport for London, Environment Agency and Highways England.</u></p> <p>2.13 In considering what policies to contain inThe Local Plan's content the council also <u>reflects the</u> has a statutory duty to have regard to Local Transport Authority policies, (which for London is Mayor's Transport Strategy), Articles 5 and 12 of the EU Directive 2012/18/EU on the prevention of major accidents and hazardous establishments (relevant to site allocations) and the national waste management plan.</p>	

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			<p>Layout of the Brent Local Plan</p> <p>2.14 As indicated earlier, The London Plan contains many detailed strategic policies that are also intended for development management purposes. The Greater London Authority considered that this would be helpful so that councils can concentrate on locally specific issues which differentiate their areas from others. The National Planning Policy Framework NPPF and draft London Plan both emphasise that there is no need for Local Plans to repeat their policies. The Local Plan therefore follows this advice where it is considered national or London policy provides sufficient policy detail. The Brent Local Plan should be seen as complementary to be read in conjunction with the London Plan, National Planning Policy Framework NPPF and Practice Guidance and London Plan Supplementary Planning Guidance documents.</p> <p>2.15 As a result of its close alignment, such the structure of the Brent Local Plan is such that it obviously complements the Good Growth Policies Objectives and chapters of the London Plan. This is shown in Figure 4. The Plan has a brief overview of Brent’s characteristics, identifying some of the challenges and opportunities. This sets the scene for the following Spatial Vision for</p>	

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			<p>Brent, identifying locally specific examples of how the Good Growth Policies-Objectives will be delivered in Brent either across the borough or through specific areas/ sites.....</p> <p>Figure 4 Proposed Structure of the Brent Local Supporting Evidence Base Documents.</p> <p>2.17 The plan is supported by a series of evidence base documents, some of which might still be in draft form. Others might need to be commissioned to further support policies where required. The Plan identifies 'key evidence' where relevant. We are also inviting comments on these supporting documents.</p> <p>.....</p> <p>2.20 In planning for Brent's future, the council has also been mindful of the commitment the United Kingdom made to the United Nation's 2030 Agenda for Sustainable Growth and how this can be best delivered. The Integrated Impact Assessment-IA embodies the 2030 Agenda principles within its objectives. All proposed policies in the Plan are have been assessed against these objectives. They seek to fairly balance the key pillars of social, economic and environmental sustainable development.</p> <p>2.21 The scope of the IIA was subject to consultation at the Issues and Options stage. The council</p>	

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			<p>worked closely with statutory consultees and other interested parties in setting out the scope and objectives within the IIA against which to assess the contents of the draft Local Plan.</p> <p>2.22 A Habitats Regulation Assessment (HRA) Screening exercise has been was carried out in accordance with European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive').....</p>	
MiMf	3 Brent Characteristics	3.9, pg. 18	<p><i>Update:</i></p> <p>3.9 Taking account of these factors, the principal focus on development activity over the last decade or so has been within Brent's longer identified Growth Areas: Alperton, Burnt Oak/ Colindale, Church End, South Kilburn and Wembley. These areas have delivered the majority of new homes and jobs required to support population growth. There are however still employment and residential areas that are not reaching their full potential in a manner consistent with the criteria that were used in identifying the current those Growth Areas. This points to new large scale regeneration opportunities within, adjacent to, or through the creation of new Growth Areas.</p>	Factual to reflect adopted status

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MiM1	3 Brent Characteristics	3.10, pg. 18	<p><i>Amend last sentence of para 3.10 to read:</i></p> <p>The extent of the challenge of these competing centres is such that despite the opening of the extensive London Designer Outlet in 2015, Wembley's market share of Brent residents' spend has continued <u>to decline</u> over the last decade.</p>	Grammar
MiM2	3 Brent Characteristics	3.12, pg.19	<p><i>Amend fifth sentence of para 3.12 to read:</i></p> <p>Increases in <u>the</u> number of homes and the amount of employment floorspace required to meet future population <u>growth</u> will mean that this trend will need to be continued.</p>	Grammar
MiMg	3 Brent Characteristics	3.13, pg.19	<p><i>Amend:</i></p> <p>3.13 Over the past <u>In the</u> 5 years <u>prior to the start of the new London Plan</u> (2014/15-2018/19) Brent has delivered 6,334 additional dwellings of which 1,592 (25%) were affordable, plus 2,216 bedrooms of student accommodation.....</p>	Factual, reflects time lapse since draft Plan.
MiM3	3 Brent Characteristics	3.13, pg.19	<p><i>Amend second sentence of para 3.13 to read:</i></p> <p>London Plan targets now requires Brent to provide 29,150-23,250 new homes from 2019/20 to 2028/29. This is equivalent to one new home being built for every 4 <u>five</u> that exist currently.</p>	Consistency with London Plan and factual. For clarity the 4 has been struck out but may not show due to formatting.
MiM4	3 Brent Characteristics	3.18, pg.20	<p><i>Amend third sentence of para 3.18 to read:</i></p>	Grammar

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			As such there is a need to provide further education for the working-age residents to help uplift to the economic base of the borough.	
MiMh	3 Brent Characteristics	3.20, pg.21	<i>Amend 3rd sentence to reflect change in organisation name:</i> Brent <u>North West London</u> Clinical Commissioning Group is aiming to create a capacity shift in care settings, with primary and community care settings taking on more services from the acute setting.	Factual
MiM5	3 Brent Characteristics	3.20, pg.21	<i>Amend fourth sentence of para 3.20 to read:</i> This will be through a number of changes, including: local hospitals offering a range of out of hospital services; hubs/health centres offering a range of services; and networks of care, formed of GP practices enhancing the capacity of primary care to delivery out of hospital services.	Grammar
MiM6	3 Brent Characteristics	3.22, pg.22	<i>Amend fourth of para 3.22 to read:</i> The exception to this in terms of new provision is at Wembley Park where new high grade offices have or are being been built.	Grammar
MiM7	3 Brent Characteristics	3.23, pg.22	<i>Amend fifth sentence of para 3.23 to read:</i> At a West London level, due to predicted demand, the Greater London Authority has identified that Brent should 'provide capacity' for there is a need for <u>additional industrial floorspace, particularly that for</u>	Reflects Secretary of States direction to modify the London Plan and evidence base. Also removes repetition with

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>storage and distribution purpose and some of this is within Brent.</u></p> <p><i>Amend part a) of para 3.23 to read:</i></p> <p>The challenges are to:</p> <ul style="list-style-type: none"> a) better meet Brent’s shopping needs locally within the borough by improving town centres, but facing market realities such as <u>recognise and adapt to likely impacts of</u> on-line retailing and recognising managed reductions in the size of some centres will undoubtedly be necessary; b) retain or deliver lower cost office/ employment premises to assist small business creation/ development; 	similar wording in paragraph 3.10c)
MiM8	3 Brent Characteristics	3.28, pg.24	<p><i>Insert new footnote in para 3.28:</i></p> <p>As with the provision of indoor sports facilities¹⁷, for a borough that hosts the National Stadium, the provision of outdoor sports facilities¹⁸ to which there is access by the general public is weaker than it should be. Improvements are needed for the provision of football pitches and tennis courts.</p>	To provide better referencing.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><i>Insert footnote reference at end of page 24 for para 3.28:</i></p> <p>¹⁷<u>Brent Council Indoor Sports and Leisure Facilities Needs Assessment November 2018</u></p> <p>¹⁸<u>A Strategic Approach to Playing Provision in Brent December 2016</u></p>	
MiM9	3 Brent Characteristics	3.33, pg.25	<p><i>Amend first two sentences of para 3.33 to read:</i></p> <p>Strategic transport improvements will occur adjacent to the borough at Old Oak with the provision of a HS2/Crossrail-<u>Elizabeth Line</u> interchange station (2026), a new station at Brent Cross West Thameslink (20232) and potentially the West London Orbital with an additional stations at <u>Harlesden and Neasden</u> (2026). These will increase public transport accessibility and use and provide focal points for development in the adjacent areas.</p>	Factual.
MiMi	3 Brent Characteristics	3.33, pg.25	<p><i>Amend second sentence to:</i></p> <p>....<u>Neasden (2026)</u>.</p> <p>Its will be used as forms the boundary of the extended Ultra-Low Emissions Zone (<u>ULEZ</u>) to be-introduced in 2021 is unclear in terms potential changes on these adverse impacts.</p>	Factual

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM10	4 Development Vision and Good Growth in Brent	4.3, pg.30	<p><i>Amend para number and last sentence of para to read:</i></p> <p><u>4.3 4.39</u> In considering the appropriateness of developments a number of factors as outlined in the policy may be applicable, whilst for some, relatively few will apply. A number of the criteria are inter-related. For each criterion there is also likely to be more specific policy considerations in the NPPF and associated Planning Practice Guidance, the London Plan <u>with associated Supplementary Planning Guidance</u> and the Brent Local Plan.</p>	Recognises extent of additional material produced by the Mayor to support London Plan policy.
MiMj	4 Development Vision and Good Growth in Brent	4.15	<p><i>Add additional last sentence:</i></p> <p><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>	Provides clarity that residential in allocations does not just mean self-contained dwellings.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM11	5.1 Central Place	Challenges table, pg.43	<i>Amend point to read:</i>	Clarity pedway meaning.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> East-west travel during events faces significant delays this will need to be further addressed by the proposed removal of the <u>pedestrian ramp (pedway)</u> leading up to Wembley Stadium 	
MiM12	5.1 Central Place	Figure 9, pg.40	<p><i>Amend caption to read:</i></p> <p>Figure 9 High Level Plan of the Place Vision. <u>More detailed boundaries can be seen on the Policies Map</u></p>	Clarification to user that the policies map will provide more clarity on individual policies boundaries.
MiM13	5.1 Central Place	5.1.17, pg.41	<p><i>Amend last sentence of para 5.1.17 to read:</i></p> <p>A variety of uses will be introduced to the east of the national stadium to provide a transition from the residential and commercial space around the London Designer Outlet through to the Strategic Industrial Locations further east. The wider Strategic Industrial Location will be protected and where possible intensified <u>for industrial uses, whilst its longer term future, particularly its western edge as an employment led extension of the high density mixed use Wembley Park typology post 2041, will be considered in more detail for development post 2029.</u></p>	Clarity on use of SIL and removal of reference to beyond the Plan period.
MiM14	5.1 Central Place	Vision, 5.1.18 ,pg.44	<p><i>Amend para 5.1.18 to read:</i></p> <p>New development will build on the cultural heritage of the national stadium and the SSE Arena while the historic Barn Hill neighbourhood will be protected to preserve</p>	Removes events lost to Covid.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			and ideally enhance its identity, creating a place where the new and existing parts of Wembley interface with one another. Wembley national stadium's use as a venue for the final of Euro 2020 and Brent's status as London Borough of Culture 2020, with its associated legacy opportunities, will be an integral part of improving the place for the future.	
MiM15	<i>(left blank)</i>			
MiM16	5.1 Central Place	5.1.21-5.1.23, pg.46	<p><i>Amend 'Homes' para 5.1.21, para 5.1.22 and para 5.1.23 to read:</i></p> <p>Homes</p> <p>5.1.21 Wembley has seen significant investment, especially around the stadium where the developer Quintain is the main landowner and are taking forward the Wembley masterplan. Development has been at greater densities than envisaged in the 2010 Core Strategy. This, plus the identification of additional sites will increase the Growth Area's potential additional residential capacity to a minimum additional 15,000 homes by 2041.</p> <p>5.1.22 Land along First Way and Watkin Road has previously been allocated for non-industrial development. These sites still provide that an opportunity, but at higher densities than previously identified in the 2010 Core Strategy,</p>	For brevity and clarity make consistent with London Plan and Local Plan (Policy BE3). Reflects Secretary of State's London Plan modification directions.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>whilst also high density residential incorporating on lower floors more employment industrial floorspace. now that Brent is a 'provide capacity' borough for industrial floorspace</p> <p>5.1.23 Outside the Wembley masterplan area There are a number of key sites which could contribute to Brent's housing need. Land either side of Brook Avenue is underutilised and recent development has established a denser character at both ends of the street. It is expected that Wembley Park Station car park is redeveloped to provide a significant number of new homes in line with London Plan guidance on station intensification. In addition, the residential units to the south of the road could be replaced with taller buildings to make better use of the land, reduce flood risk and provide an improved setting for Wealdstone Brook.</p>	
MiM17	5.1 Central place	5.1.27, pg. 47	<p><i>Amend last sentence of para 5.1.27 to read:</i></p> <p>The retail and leisure needs study identifies potential for development of further uses which support these functions should conform with Policy BE4 Protecting retail in town centres <u>Supporting Strong Centres</u>, but care should be taken to ensure that the centre's ability to meet day-to-day shopping needs is not reduced along with residential amenity and safety.</p>	Factual Update of Policy name

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM18	5.1 Central place	5.1.29, pg.47	<p><i>Amend para 5.1.29 to read:</i></p> <p>The London Industrial Land Demand Study identified Brent as needing to increase capacity across its Strategic Industrial Locations (SIL). The SIL east of Wembley Stadium forms part of a larger industrial site which should be protected to prevent further loss or undermining of the employment land hierarchy. Land at First Way and Watkin Road previously allocated due to its increased potential for high density development, provides greater scope than previously assumed to can help address the need for industrial floorspace Brent's status as a provide capacity borough in the London Plan by incorporating ground floor employment uses.</p>	Brevity and reflects Secretary of State's London Plan modification directions.
MiM19	5.1 Central place	5.1.30,pg. 47	<p><i>Remove last sentence of para 5.1.30 to read:</i></p> <p>Towards the east, SIL in the area bounded by development that will occur along First Way/Watkin Road area, London Plan SIL policy E7 will be implemented. If, however there has not been any tangible progress on delivery of intensification by 2029 (either on the ground or via credible developer interest and it is not deliverable due to viability) this area will be actively considered in an update of this Local Plan for co-location/intensification as an extension to the high density mixed use environment of Wembley Park.</p>	Removes unnecessary text for brevity and clarity

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM20	5.1 Central place	5.1.33, pg.48	<p><i>Amend last sentence of para 5.1.33 to read:</i></p> <p>The provision of Boxpark, Troubadour theatre (<u>meanwhile uses</u>) plus the development of Plot W12 which has permission for further cultural facilities provides the opportunity to further consolidate the cultural offer of the area in the longer term as part of the place making strategy.</p>	Acknowledge meanwhile status.
MiM21	5.1 Central place	5.1.37, pg.49	<p><i>Amend last sentence of para 5.1.37 to read:</i></p> <p>Existing small open spaces should be protected and enhanced given the lack of public space currently available in the Central area. Sites of Special Nature Conservation Interest <u>Importance for Nature Conservation</u> such as the Wealdstone Brook and railway corridors provide the opportunity for further ecological enhancement of the place.</p>	Factual
MiM22	5.1 Central place	Other Policy Guidance, pg.50	<p><i>Remove the following:</i></p> <p>Other Policy Guidance</p> <ul style="list-style-type: none"> ● Approved Masterplan for Wembley Park relating to Planning Permission 15/5550 ● Approved Masterplan for the South West Lands relating to Planning permission 14/4931 	Not adopted policy guidance and removes unnecessary text for brevity and clarity
MiM23	5.1 Central place	FIGURE 11	<p><i>Amend to read:</i></p>	Update

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
		(South West Lands SW01/02 South Way), pg.78	Ref: 14/4931 & 18/0742 Address: SW01/02/07 Indicative homes: 127 156 Comments: Site ready On site. Completion due 2022/23	
MiM24	5.1 Central place	FIGURE 11 (South West Lands SW03/04/05 South Way), pg.78	Remove from list: Ref: 14/4931 Address: SW03/04/05 South Way Indicative homes: 739 Comments: On site	Removed as completed.
MiM25	5.1 Central place	FIGURE 11 (South West Lands SW06/07 South Way), pg.78	Remove from list: Ref: 14/4931 Address: South West Lands SW06/07 South Way Size (ha): 0.1 Existing Use: NA Permission Uses: Residential Indicative homes: 29 Comments: Site ready	Removed included in SW01/02/07.
MiM26	5.1 Central place	FIGURE 11 (Mahatma Gandhi	Remove from list:	Removed as completed.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
		House, South Way), pg.78	Ref: 15/4714 Address: Mahatma Gandhi House, South Way Indicative homes: 198 Comments: On-site	
MiM27	5.1 Central place	FIGURE 11 (Wembley masterplan W03), pg.78	<i>Remove from list:</i> Ref: 03/3200 Address: Wembley masterplan W03 Indicative homes: 340 Comments: On-site Completion Autumn 2019	Removed as completed.
MiM28	5.1 Central place	FIGURE 11 (Wembley masterplan W06), pg.78	<i>Remove from list:</i> Ref: 15/5550 Address: Wembley masterplan W06 Indicative homes: 150 Comments: On-site	Removed as completed.
MiM29	5.1 Central place	FIGURE 11 (Wembley masterplan NW09/10), pg.78	<i>Amend 'comments' to read:</i> Comments: On-site. <u>Completion due 2022/2023</u>	Update

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM30	5.1 Central place	FIGURE 11 (Wembley masterplan NW11), pg.78	<i>Amend 'comments' to read:</i> Comments: Meanwhile use completed. <u>Completion due 2030/31</u>	Update
MiM31	5.1 Central place	FIGURE 11 (1 Olympic Way), pg.78	<i>Amend 'ref' and 'comments' to read:</i> Ref: 17/4538 & 19/0395 Comments: <u>Started on site</u>	Update
MiM32	5.1 Central place	FIGURE 11 Wembley masterplan E01/02, pg.78	<i>Amend 'comments' to read:</i> Comments: On site <u>and party completed</u> — completion Autumn 2020	Update
MiM33	5.1 Central place	FIGURE 11 Wembley masterplan E03, pg.78	<i>Amend 'comments' to read:</i> Comments: On-site close to completion-completion Autumn 2020	Update
MiM34	5.1 Central place	FIGURE 11 Wembley masterplan E05, pg.78	<i>Amend 'comments' to read:</i> Comments: On site - <u>Completion due 2021/22</u>	Update
MiM35	5.1 Central place	FIGURE 11 Amex House North End Road, pg.78	<i>Remove from list:</i>	Removed as completed.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Ref: 16/1404 Address: Amex House North End Road Indicative homes: 195 Comments: Autumn 2020 Completion	
MiM36	5.1 Central place	FIGURE 11 Kelaty House First Way, pg.78	Amend 'comments' to read: Comments: Started <u>on</u> site.	Update
MiM37	5.1 Central place	FIGURE 11 6-10 Hallmark Trading Centre, Fourth Way HA9 0LB, pg.78	Amend 'comments' to read: Comments: Prior Approval - <u>Started on site</u>	Update

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM38	5.2 East	All paragraphs	Amend numbering of all paragraphs in chapter 5.2 to read 5.2.x	Publishing mistake
MiM39	5.2 East	5.2.8, pg.81	Amend numbering and second last sentence of para 5.2.8 to read: 5.1.8 <u>5.2.8</u> Smaller Locally Significant Industrial sites are located along Kingsbury Road, <u>Edgware Road</u> and near Neasden station.	To reflect all LSIS in the Place.
MiM40	5.2 East	Figure 13, pg.82	Amend caption to read:	To clarify that boundaries can be

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Figure 13 High Level Plan of the Place. <u>More detailed boundaries can be seen on the Policies Map</u>	viewed in greater detail on the policies map.
MiM41	5.2 East	Vision, 5.2.10, pg.83	<i>Amend third sentence of para 5.2.10 to read:</i> Employment <u>Industrial</u> space that meets 21 st century needs will be prioritised in association with new homes and social infrastructure.	To reflect London Plan policy emphasis on industrial provision.
MiM42	5.2 East	Vision, 5.2.11, pg.83	<i>Amend para 5.2.11 to read:</i> Elsewhere existing low density development and limited potential for improvements to public transport accessibility will mean extensive change is unlikely. Opportunities for new development will however exist, e.g. town centres and intensification corridors along main public transport corridors, whilst with the height of buildings related to these opportunities will being typically be up to 5 to 6 storeys. a Active ground floor frontages will wherever possible be maintained <u>or improved</u> .	To reflect policy BD2 and the aspiration of improving town centres.
MiM43	5.2 East	5.2.15, pg.86	<i>Amend para 5.2.15 to read:</i> Elsewhere opportunities for taller buildings (up to 5 storeys) are considered likely to be appropriate along intensification corridors and Neasden town centre (up to	To reflect policy BD2

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			6 storeys) where the larger scale buildings in the area already exist.	
MiM44	5.2 East	5.2.23- 5.2.25, pg.87	<p><i>Amend 'Employment & Skills' para 5.2.23, para 5.2.24, para 5.2.25 to read:</i></p> <p>Employment & Skills</p> <p>5.2.23 The principal areas of industrial employment are currently the designated areas at Staples Corner, Kingsbury and Neasden. As identified Staples Corner and Neasden will be taken forward as Growth Areas. This will not be at the expense of employment <u>industrial</u> space, which needs to be added to. Much of these areas have suffered from very low levels of investment in premises over the years. As such many buildings' usefulness/ levels of employment provision are low. Where investment has been made, much has been in quasi retail/ trade counters.</p> <p>5.2.24 Consistent with London Plan policy, the council is seeking to ensure intensification of employment <u>industrial</u> use in modern fit for purpose premises. Providing the incentive to develop these however is considered more likely to happen with cross-subsidy from other more lucrative uses. The council recognises that to date the mixing of larger scale employment <u>industrial</u> uses with residential development in particular has been limited and needs careful management to be</p>	Consistency with the London Plan

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>successful, creating good environments for communities and businesses.</p> <p>5.2.25 The Kingsbury employment <u>industrial</u> area retains principally clearly defined boundaries, with very little encroachment from non-employment uses. Exceptions have been the permitted development of office to residential which the council has now ceased through an Article 4 direction. The council will support the area's continued <u>employment industrial</u> use through encouraging investment only in employment <u>industrial</u> uses.</p>	
MiM45	5.2 East	Key Site Allocations, pg.88	<p><i>Amend to read:</i></p> <p>Neasden Stations Growth Area</p> <p>Staples Corner Growth Area</p> <p>Coombe Road</p> <p>Cricklewood Bus Depot.</p>	To reflect the most significant site allocations.
MiM46	5.2 East	After Key Site Allocations, pg.88	<p><i>Remove the following:</i></p> <p>Other Policy Guidance</p> <p>Staples Corner Growth Area Master Plan / Supplementary Planning Document / Area Action Plan (forthcoming)</p> <p>Neasden Stations Growth Area Master Plan / Supplementary Planning Document / Area Action Plan (forthcoming)</p>	Reflects current status of the guidance which has not yet been progressed.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM47	5.2 East	Figure 15	<i>Remove the following:</i> 13/2453-1 Barons Court Residential Residential 26	Site completed.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiMk	5.3 North	Figure 15 and all subsequent Figure numbers.	<i>Amend to:</i> Figure 15 <u>16</u>	Wrong figure number - Figure 15 is in the preceding chapter. All subsequent figures need updated references
MiM48	5.3 North	Figure 16, pg. 108	<i>Amend caption to read:</i> Figure 16 <u>17</u> High Level Plan of the Place. <u>More detailed boundaries can be seen on the Policies Map</u>	Clarification that policy area boundaries can be viewed more clearly on the policies map.
MiMl	5.3 North	5.3.14	<i>Amend last sentence to read:</i> 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	Reflects fact cycling infrastructure is not predominantly purpose built.
MiM49	5.3 North	Vision, 5.3.22, pg. 109	<i>Amend para 5.3.22 to read:</i> Intensification and co-location within the locally significant industrial sites in this place will create employment industrial space that meets 21st century needs and continue to provide good local employment opportunities.	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM50	5.3 North	Vision, 5.3.23, pg.109	<i>Amend para 5.3.23 to read:</i> These however, will be more reflective of the suburban character in terms of scale, being no more than typically 5 storeys in height or up to 6 storeys <u>with potential to go higher at strategic points</u> in town centres. Other in-fill development will respect its context in terms of height and character.	Consistency with policy BD2.
MiM51	5.3 North	5.3.26, pg.112	<i>Amend para 5.3.26 to read:</i> Opportunities for buildings above 10 storeys will be promoted in the Burnt Oak and Colindale Growth Area. Opportunities for taller buildings (around 5 storeys) may be considered to be appropriate to support the intensification and co-location of employment <u>industrial</u> uses at the Queensbury LSIS and Morrisons sites. The same is true within the town centres (18 metres/ 6 storeys) and along the intensification corridors (15 metres/ 5 storeys) of the A4006 Kingsbury and Kenton Roads and A4140 Fryent Way and Honeypot Lane.	Consistency with the London Plan and Local Plan (Policy BD2).
MiM52	5.3 North	5.3.28, pg.112	<i>Amend para 5.3.28 to read:</i> The Capitol Valley site within the Burnt Oak and Colindale Growth Area contains <u>an</u> area of land designated as LSIS. Redevelopment of the site, which will be in accordance with the approved Masterplan, will need to address the requirement to intensify employment <u>industrial</u> uses too. In advance of the adoption of a masterplan for this site, the council will resist small scale release, unless it can be shown to not	Grammar and consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			undermine the outcomes of any likely adopted masterplan.	
MiM53	5.3 North	5.3.29, pg.112	<i>Amend para 5.3.29 to read:</i> Mixed-use redevelopment will also support intensification of employment <u>industrial</u> space on the LSIS in accordance with the borough's London Plan ' provide capacity ' status through co-location with other uses <u>policy E6</u> . In addition, it increases the potential to improve the quality of the public realm along Honeypot Lane and Cumberland Road. A masterplanning exercise will be undertaken for this site to determine the approximate mix of uses to achieve an increase in employment <u>industrial</u> floorspace and retention of a food store whilst providing a significant number of new homes and any required associated infrastructure.	Consistency with the London Plan.
MiM54	5.3 North	5.3.40, pg.114	<i>Amend second sentence of para 5.3.40 to read:</i> The redevelopment of these sites is expected to intensify employment <u>industrial</u> floorspace and ensure long term safeguarding for employment <u>industrial</u> uses.	Consistency with the London Plan.
MiM55	5.3 North	5.3.46, pg.114	<i>Add new sentence at end of para 5.3.46 to read:</i> <u>This new boundary is considered to form an extension to the Burnt Oak and Colindale Opportunity Area boundary previously identified to be within Brent.</u>	Reference to opportunity area
MiM56	5.3 North	5.3.47, pg.114	<i>Amend para 5.3.47 to read:</i>	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			An extensive area of Locally Significant Industrial Site off Capitol Way provides the opportunity to better meet Brent's longer term employment <u>industrial</u> needs through investment in new premises. Consistent with London Plan employment <u>industrial</u> land policies and Brent's 'provide capacity' status, this area will need to be subject to wider masterplanning to ensure effective re-provision. Subject to this process being undertaken, the area is identified as potentially acceptable for co-location to provide a more mixed use area that can also contribute towards improving the sense of place and meeting housing needs.	
MiM57	5.3 North	Key allocations, pg.116	<i>Amend key allocations to read:</i> Colindale Retail Park, <u>Multi-storey Car Park and Southon House</u> and Trust Ford Garage <u>Queensbury Honeypot Lane</u> LSIS and Morrisons	Consistency with allocation name.
MiM58	5.3 North	Other policy guidance, pg.116	<i>Remove:</i> Masterplans for Capitol Way Valley, Colindale Retail Park and Queensbury LSIS	Documents have yet to be progressed.
MiM59	5.3 North	Figure 18 15/1337, pg.130	<i>Remove reference to permission and associated text</i>	Development completed
MiM60	5.3 North	Figure 18 17/1342, pg.130	<i>Remove reference to permission and associated text</i>	Development completed
MiM61	5.3 North	Figure 18 17/1829, pg.130	<i>Amend 'comments' to read:</i>	Update progress

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Supported accommodation. <u>Aiming for completion summer 2022.</u>	
MiM62	5.3 North	Figure 18 16/2353, pg.130	<i>Remove reference to permission and associated text</i>	Permission expired
MiM63	5.3 North	Figure 18 17/0837, pg.130	<i>Amend 'existing use' to read:</i> B8-Storage and distribution	Reflects move to description of uses rather than use classes in the Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiMm	5.4 North West	Title	<i>Amend to:</i> North West Place	Consistency through Plan
MiM64	5.4 North West	All paragraphs	<i>Amend numbering of all paragraphs in chapter 5.4 to read 5.4.x</i>	Publishing mistake
MiM65	5.4 North West	5.4.12, pg.134	<i>Amend last para of 5.4.12 to read:</i> These include good access to the strategic road network and a 'good and fit for purpose industrial land supply' which makes it supportive of employment <u>industrial</u> activities.	Consistency with the London Plan.
MiM66	5.4 North West	Opportunities, pg.135	<i>Amend 'opportunities' point to read:</i> <ul style="list-style-type: none"> Intensification of employment<u>industrial</u> uses at East Lane. 	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM67	5.4 North West	Figure 20, pg.136	<i>Amend caption to read:</i> Figure 20 ²⁰²¹ High Level Plan of the Place <u>More detailed boundaries can be seen on the Policies Map</u>	Clarity that more detailed policy boundaries can be seen on the policies map.
MiM68	5.4 North West	5.4.20, p.138	<i>Amend last para of 5.4.20 to read:</i> In addition, town centres and intensification corridors will accommodate development of potentially around 18 metres (6 storey) and 15 metres (5 storeys) respectively, <u>with the opportunity to go higher at strategic points in the town centres.</u>	Consistency with BD2.
MiM69	5.4 North West	Prior to 5.4.24, pg.138	<i>Amend to add as title and remove from para 5.4.24:</i> Employment and Skills 5.4.24 Employment and Skills , In comparison to other places....	Heading misplaced in paragraph text.
MiM70	5.4 North West	5.4.26, pg.138	<i>Amend para 5.4.24 to read:</i> East Lane SIL has a number of positive characteristics which in the context of London Plan policy make it a good candidate for further intensification for employment <u>industrial</u> uses.	Consistency with the London Plan.
MiM71	5.4 North West	5.4.30, pg.139	<i>Remove last sentence from para 5.4.30 to read:</i> Furthermore, the opportunities to improve the sports pavilion to support the development that is to come forward within the Growth Area will be supported. One	This option has now been discounted.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			option being considered is to swap the land currently occupied by the sports pavilion and car park with an equivalent area adjacent to Northwick Park station to create an open, active and welcoming frontage by the station. The location of the new sports pavilion has yet to be agreed. Any MOL land swap associated with this will need to demonstrate that it is in compliance with London and national policy, and ensure that there is no net loss in open space.	
MiM72	5.4 North West	5.4.38, pg.140	<i>Amend first sentence of para 5.4.38 to read:</i> Northwick Park and the Ducker Pond Pool are a designated SINC site of borough importance (Grade I).	Correct name
MiM73	5.4 North West	Other Policy Guidance, pg.140	<i>Remove:</i> Other Policy Guidance Northwick Park Master Plan/ Supplementary Planning Document/ Area Action Plan (forthcoming)	Document not adopted.
MiM74	5.4 North West	Figure 21 17/3717, pg.148	<i>Amend 'comments' to read:</i> <u>Works started on site late 2019</u>	Update progress
MiM75	5.4 North West	Figure 21 16/3294, pg.148	<i>Amend 'comments' to read:</i> Assisted Living Accommodation. <u>Works to complete late 2022.</u>	Update progress

	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM76	5.5 South Place	Chapter Heading, pg.149	<i>Amend chapter heading to read:</i> "SOUTH PLACE"	Consistency in the document
MiM77	5.5 South Place	5.5.2, pg.151	<i>Amend last sentence of para 5.5.2 to read:</i> St Raphael's is a housing estate with a mixed architectural character, from 1960s three-to-four storey apartment blocks to more traditional two-storey terraces to the east.	To correct typo
MiM78	5.5 South Place	5.5.6, pg.151	<i>Amend first part of para 5.5.6 to read:</i> <u>This Place also contains the southern part of Wembley SIL either side of the North Circular Road. Locally Significant Industrial Sites in Church End contain low density employment industrial uses and have a poor quality environment.</u>	Reflects element of SIL within the area and consistency with the London Plan
MiM79	5.5 South Place	Figure 23, pg.153	<i>Edit caption to read:</i> High Level Plan of the Place <u>More detailed boundaries can be seen on the Policies Map</u>	Clarity where more detailed policy boundaries are.
MiM80	5.5 South Place	5.5.30, pg.159	<i>Amend para 5.5.30 to read:</i> The regeneration of Old Oak, an existing industrial site to the south of Harlesden, is planned. It will deliver 24,000 <u>25,500</u> homes and 55,000 <u>65,000</u> new jobs focussed around a new High Speed 2 and Elizabeth Line	Change related to modifications to draft OPDC Local Plan following Car Giant site change and taking account of information

	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			interchange and intensification in Park Royal is to deliver a further 10,000 jobs and 1,500 homes. The project is being led by the Old Oak Park Royal Development Corporation (OPDC). It will be important that the council continues to work with the OPDC <u>and Network Rail as the owners of the operational rail infrastructure, in addition to Transport for London, potential developers and community groups.</u> This is to ensure this significant regeneration project brings the highest number of benefits for Brent residents as possible. In particular, a key priority is to improve the connectivity between Old Oak and Harlesden through, <u>now likely to focus on Old Oak Lane, in addition to an enhanced Willesden Junction Station (including over-station development), and wayfinding...</u>	on Willesden Junction station.
MiM81	5.5 South Place	5.5.32, pg.160	<i>Amend para 5.5.32 to read:</i> The West London Orbital will further improve the connectivity of this area making it a desirable location to live and work. There is an opportunity to extend the Growth Area boundary to include nearby low density employment <u>industrial</u> sites to promote investment in these areas. Church End Locally Significant Industrial Sites are low density employment <u>industrial</u> sites, which also contain uses including retail. These sites have experienced limited investment and in places have a low quality environment. Intensifying these areas through mixed-use development will encourage investment	Consistency with the London Plan.

	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			whereby residential development can support the provision of modern workspace to help meet the borough's need for incubators, accelerators and co-working space. The West London Orbital route will greatly increase public transport accessibility levels in this location, further supporting the need for higher density development on these sites. In advance of adoption of a Church End masterplan supplementary planning document which will seek comprehensive solutions for these employment industrial areas, small scale release of sites will be resisted.	
MiM82	5.5 South Place	5.5.34, p,160	<p><i>Amend second sentence of para 5.5.34 to read:</i></p> <p>With the exception of the Afghan Community Centre there is a lack of community space in Church End. A new space to serve as an employment, a <u>workspace</u>, <u>multi-use community centre</u>, and health hub <u>a primary care health centre</u> will help promote community cohesion.</p>	Consistency with BP5.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM83	5.6 South East Place	5.6.5, pg.183	<p><i>Amend para 5.6.5 to read:</i></p> <p>Although there are no designated employment industrial sites here, there is a strong entrepreneurial culture with the highest proportion of micro businesses (with less</p>	Consistency with the London Plan and factual correction.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			than 9 employees), home working and self-employment in the borough. Creative businesses are clustered in Queen's Park Creative Quarter on Lonsdale Avenue Road, Kilburn High Road and increasingly at Willesden Green. Employment is concentrated in ICT, media, creative services, professional and financial services.	
MiM84	5.6 South East Place	5.6.8, pg.184	<i>Amend para 5.6.8 to read:</i> The London Overground travels through this place <u>providing an orbital route</u> linking Richmond/Clapham Junction and Stratford, stopping at Willesden Junction, Kensal Rise, Brondesbury Park and Brondesbury. Orbital travel further north in this place is reliant on the bus network, which due to road congestion is less reliable. In particular, the A5 is a congested route into central London.	Clarification of what London Overground does.
MiM85	5.6 South East Place	Challenges, pg.183	<i>Amend first point to read:</i> <ul style="list-style-type: none"> Although generally a relatively an affluent place there are areas of deprivation particularly in South Kilburn, parts of which in 2015 were in the top 10% of the most deprived areas in the country. Linked to this parts of Kilburn experience amongst the lowest levels of reported good health in the borough. 	To correct typo

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM86	5.6 South East Place	Opportunities, pg.183	<p><i>Amend fifth point to read:</i></p> <ul style="list-style-type: none"> • Support and enhance clusters of creative industries in Queen’s Park, Willesden Green and Kilburn to establish Creative Quarters and help meet demand for incubators, accelerators and co-working space. Consider the potential for these clusters to be future Creative Enterprise Zones, a designation by the Mayor of London which recognises an area’s contribution to supporting creative activity, including artists and creative businesses. Supporting research into a ‘Creative Clusters’ and possible establishment of a Creative Enterprise Zone within Queen’s Park, Willesden Green and Kilburn, in accordance with London Plan policy HC5 ‘Supporting London’s Culture and Creative Industries’. 	To clarify that the phrase ‘creative clusters’ is in relation to London Plan HC5.
MiM87	5.6 South East Place	Opportunities, pg.183	<p><i>Amend seventh point to read:</i></p> <ul style="list-style-type: none"> • Creation of a West London Orbital passenger route on the Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to the proposed Brent Cross <u>West</u> Thameslink station (Midland Main Line). 	Factual
MiM88	5.6 South East Place	Opportunities, pg.183	<p><i>Remove final point:</i></p> <ul style="list-style-type: none"> • The proposed Kensal Canalside development of 3,500 new homes and other uses in the adjacent Royal Borough of Kensington and Chelsea lies to the south of this Place 	Brevity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM89	5.6 South East Place	Figure 26, pg.182	<p><i>Amend caption to read:</i></p> <p>Figure 26 High Level Plan of the Place <u>More detailed boundaries can be seen on the Policies Map</u></p>	Clarity that more detailed policy boundaries can be seen on the policies map.
MiM90	5.6 South East Place	5.6.11-5.6.12, pg.186	<p><i>Amend para 5.6.11 and para 5.6.12 of 'Character, Heritage and Design' to read:</i></p> <p>Character, Heritage and Design</p> <p>5.6.11 The council is undertaking a review of conservation area boundaries and producing Conservation Area Design Guides. The proposed extension to the Mapesbury, <u>Kensal Green, Queen's Park, Brondesbury, Kilburn and Willesden Green Conservation Areas, plus potential new ones for Kensal Rise, Kilburn Lane and Malvern Road</u> boundary to include parts of Cricklewood Town Centre reflects the distinct and special character of these areas as outlined in the Brent Heritage Study. This will ensure that future development contributes positively to the character of these areas.</p> <p>5.6.12 This place has a strong sense of character, dominated by two to three storey Victorian terraces and suburban houses with large gardens. Developments should reflect this characteristic with the exception of the South Kilburn Growth</p>	Factual and consistent with Policy BD2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Area <u>which is identified as a Tall Buildings Zone</u> where more intense redevelopment at higher densities is part of the SPD for the area.</p> <p>Elsewhere-In intensification corridors such as the A407 High Road and A4003 Willesden Lane, <u>denser development buildings up to 5 storeys in height could be appropriate.</u></p>	
MiM91	5.6 South East Place	5.6.22, pg.187	<p><i>Amend second sentence of para 5.6.22 to read:</i></p> <p>Within this area there are no designated <u>employment industrial sites</u>, but a high level of micro-businesses and home working.</p>	Consistency with the London Plan.
MiM92	5.6 South East Place	5.6.23, pg.188	<p><i>Amend third sentence of para 5.6.23 of 'Open Space and Biodiversity' to read:</i></p> <p>It will therefore be important to ensure the quality of existing open spaces are enhanced. In the Keep Britain <u>Tidy</u> qualitative study forming part of the Brent Open Space Study (2019), open spaces in this place overall scored highly.</p>	To correct
MiM93	5.6 South East Place	5.6.24, pg.188	<p><i>Amend third sentence of para 5.6.24 of 'Transport' to read:</i></p> <p>The West London Orbital, which will make use of the existing Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to High Speed 2 and Crossrail-<u>Elizabeth Line</u> and Old Oak and to the east Thameslink at Brent Cross.</p>	To reflect name change

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM94	5.6 South East Place	Key site allocations, pg.190	<i>Amend Key Site Allocations to read:</i> South Kilburn Growth Area Cricklewood Retail Park and Town Centre sites Kilburn Market Square Willesden Green Town Centre sites	To clarify larger key sites
MiM95	5.6 South East Place	Other policy guidance, pg190	<i>Amend list to read:</i> Mapesbury <u>Conservation Area</u> Design Guide North Kilburn <u>Conservation Area</u> Design Guide Queen's Park <u>Conservation Area</u> Design Guide	Correct titles.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiMn	5.7 South West Place	Title	<i>Amend to:</i> South West <u>Place</u>	Consistency with other parts of Local Plan
MiM96	5.7 South West Place	5.7.2, pg.237	<i>Amend first sentence of para 5.7.2 to read:</i> The South West place includes an area which has been subject to neighbourhood planning, in the adopted Sudbury <u>Town</u> Neighbourhood Plan.	Correct name
MiM97	5.7 South West Place	5.7.3, pg.237	<i>Amend third sentence of para 5.7.3 to read:</i> There are however two Growth Areas delivering ambitious regeneration in Wembley (<u>which also crosses over into the Central place</u>), centred around the town centre, and Alperton around the underground station and along the Grand Union Canal.	Factual
MiM98	5.7 South West Place	Figure 30, pg.238	<i>Amend caption to read:</i> Figure 30 High Level Plan of the Place <u>More detailed boundaries can be seen on the Policies Map</u>	Clarity that more detailed policy boundaries can be seen on the policies map.
MiM99	5.7 South West Place	5.7.11, p.239	<i>Amend third sentence of para 5.7.11 to read:</i> Sudbury & Harrow <u>Road</u> rail station is located within the town centre boundary, with Sudbury Town tube station located to the south	Correct name
MiM100	5.7 South West Place	5.7.15, pg.242	<i>Amend para 5.7.15 to read:</i>	Consistency with BD2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Outside these regeneration areas building height will more reflective of the local context. Town centres (around 18 metres/6 storeys) and intensification corridors (around 15 metres/5 storeys) will provide the opportunity for some additional height. Elsewhere development will be expected to come forward at levels not significantly higher than existing two and three storey developments.	
MiM101	5.7 South West Place	5.7.22, pg.243	<i>Amend para 5.7.22 to read:</i> Alperton (South) LSIS land will be protected for solely employment <u>industrial</u> uses within use class B1c, B2, B8 and all closely related sui generis uses <u>research and development/light industrial/general industrial/storage or distribution</u> and where possible its use intensified.	Consistency with the London Plan.
MiM102	5.7 South West Place	5.7.23, pg.244	<i>Amend first sentence of para 5.7.23 to read:</i> Redevelopment of existing industrial floorspace and provision of new employment <u>industrial</u> floorspace in mixed-use development (co-location) will be accepted in the Growth Area on LSIS around the junction of Ealing Road and Bridgewater Road where set out in site allocations.	Consistency with the London Plan.
MiM103	5.7 South West Place	5.7.31, pg.245	<i>Amend second last sentence of para 5.7.31 to read:</i> The redevelopment of Northfields Grand Union which has commenced for approximately 2900 <u>3350</u> new	Correct dwellings to reflect current planning permission.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			homes plus employment land, social infrastructure and energy centre by St George Homes indicates the confidence in the area's long term potential.	
MiM104	5.7 South West Place	5.7.32, pg.246	<i>Amend second last sentence of para 5.7.32 to read:</i> Taking account of much of its use as either Locally Significant Industrial Site, Local Employment Site and Strategic Industrial Land and Brent's <u>need to provide for additional industrial floorspace</u> provide capacity status for employment land in the London Plan , a greater emphasis on <u>employment industrial use</u> in mixed use developments is now sought than was previously the case in allocations.	Consistency with the London Plan and brevity.
MiM105	5.7 South West Place	After 5.7.33	<i>Insert after para 5.7.33 to read:</i> <u>Relevant Policy Documents</u> <u>Sudbury Town Neighbourhood Plan</u>	For clarity
MiM106	5.7 South West Place	Key sites , pg. 246	<i>Amend key site name to read:</i> Northfields East of Grand Union	Consistency across the Plan with allocation name.
MiM107	5.7 South West Place	Figure 32, pg.271, 253a Ealing Road	<i>Amend 'comments' to read:</i> Comments: Not started	Update
MiM108	5.7 South West Place	Figure 32 , pg.271, 1C Carlyon Road	<i>Remove record</i>	Completed

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM109	5.7 South West Place	Figure 32 , pg.271, 2 Atlip Road	<i>Remove record</i>	Expired
MiM110	5.7 South West Place	Figure 32 , pg.271, All Units at Abbey Wharf & Delta Centre and All of 152, Mount Pleasant	<i>Remove record</i>	Completed
MiM111	5.7 South West Place	Figure 32 , pg.271, Heron House, 109-115 Wembley Hill Road	<i>Amend 'comments' to read:</i> Comments: Prior approval -started	Update
MiM112	5.7 South West Place	Figure 32, pg.271, Chesterfield House	<i>Remove record</i>	Completed
MiM113	5.7 South West Place	Figure 32 , pg.271, Brent House	<i>Remove record</i>	Completed
MiM114	5.7 South West Place	Figure 32 , pg.271, Cottrell House, 53-63 Wembley Hill Road	<i>Remove record</i>	Completed

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM115	6.1 Design	6.1.10 London Plan, p.276	<i>Amend London Plan policies to read:</i> LONDON PLAN Policy D4A2 Infrastructure Requirements for Sustainable Densities	Correct policy references.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Policy D46<u>3</u> Optimising site capacity through a design led approach</p> <p>Policy D24<u>4</u> Delivering Good Design</p> <p>Policy D35<u>5</u> Inclusive Design</p> <p>Policy D46<u>6</u> Housing Quality and Standards</p> <p>Policy D57<u>7</u> Accessible Housing</p> <p>Policy D78<u>8</u> Public Realm</p> <p><u>Policy D9 Tall Buildings</u></p> <p>Policy D101<u>1</u> Safety, security and resilience to emergency</p> <p>Policy D142<u>2</u> Fire Safety</p> <p>Policy D123<u>3</u> Agent of Change</p> <p>Policy D134<u>4</u> Noise</p>	
MiM116	6.1 Design	6.1.23, pg,280	<p><i>Amend first sentence of para 6.1.23 to read:</i></p> <p>London Plan Policy D910<u>10</u> Basements <u>development</u> requires the council to establish a policy to address the negative impacts of large-scale basement development below existing buildings.</p>	Correct policy reference
MiM117	6.1 Design	6.1.23 London Plan, pg,280	<p><i>Amend London Plan policies to read:</i></p> <p>D910<u>10</u> Basements <u>development</u></p> <p>HC1 Heritage conservation and growth</p>	Correct policy reference

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM118	6.2 Housing	6.2.2, pg.282	<p><i>Amend last sentence of para 6.2.2 to read:</i></p> <p>The draft London Plan increases it to 2,915 <u>2,350</u> from 2019/20.</p>	Consistency with London Plan.
MiM119	6.2 Housing	6.2.12, pg. 284	<p><i>Amend para 6.2.12 to read:</i></p> <p>The cost, limited availability of housing and flexibility of development rights has resulted in many Brent homes becoming houses in multiple occupation (HMO); properties shared by two or more households. Whilst they do <u>Where such accommodation is purpose built, well managed and high quality it provides</u> a valuable role in meeting housing need <u>and will be supported.</u> <u>However where this is not the case</u> their concentration can sometimes have adverse impacts on neighbours. This includes; poor maintenance of properties and waste management, overcrowding, increased anti-social behaviour, pressure on parking and other social infrastructure. <u>HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families.</u> Increased permitted development rights together with lack of housing licensing requirements for smaller HMOs until quite recently has resulted in the council having a limited ability to address this matter. There are now approximately 16,000 HMOs in Brent.</p>	Provide clarity on positive and negative attributes of HMOs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM120	6.2 Housing	6.2.13, pg.284	<i>Amend last sentence of para 6.2.13 to read:</i> Nevertheless, the council is likely to go through the process of removing permitted development rights for change of use to HMOs to come into effect in 2020 <u>2022</u> .	Revised timetable for proposed Article 4 start date.
MiM121	6.2 Housing	6.2.16, pg.285	<i>Amend last sentence of para 6.2.16 to read:</i> The draft London Plan sets a benchmark target <u>figure</u> for Brent of 230 additional homes per year.	Consistency with London Plan.
MiM122	6.2 Housing	6.2.18, pg.285	<i>Amend second last sentence of para 6.2.18 to read:</i> With the likely further <u>higher</u> education sector expansion proposed, accommodation needs are increasing.	Clarity that the expansion will be in higher education which generates the accommodation needs rather than further education.
MiM123	6.2 Housing	6.2.20, pg.286	<i>Remove last sentence of para 6.2.20 to read:</i> The draft London Plan definition includes more qualifying criteria.	Reflects Secretary of State's directions to modify the London Plan.
MiM124	6.2 Housing	6.2.21, pg.286	<i>Amend para 6.2.21 to read:</i> The council with other West London boroughs undertook a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment in 2018. This used both definitions. The national definition <u>used</u> identified no additional pitch needs. Indeed Lynton Road <u>Close</u> occupiers are not defined as Gypsies or Travellers for	Reflects Secretary of State's directions to modify the London Plan definition and more recent Council work assessing the Lynton Close site and occupiers' needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>planning purposes due to their limited travelling. <u>More recent work by the Council in assessing the quality of accommodation available at the Lynton Close site indicates the need for significant on-site improvements. If these cannot be achieved potentially an alternative site might need to be identified to meet all current occupants' accommodation needs. Using the alternative London Plan definition, a minimum of 90 additional pitches are required. Assuming traditional levels of density of accommodation this would indicate the need for nearly 3 hectares of additional sites. This would translate into the need for three or more sites, depending on their size.</u></p>	
MiM125	6.2 Housing	After 6.2.27 London Plan, pg.287	<p><i>Amend London Plan policies to read:</i></p> <p>LONDON PLAN</p> <p>Policy H3 Monitoring housing targets</p> <p>Policy H43 <u>Meanwhile use</u></p> <p>Policy H54 <u>Delivering affordable housing</u></p> <p>Policy H65 <u>Threshold approach to applications</u></p> <p>Policy H76 <u>Affordable housing tenure</u></p> <p>Policy H87 <u>Monitoring of affordable housing</u></p> <p>Policy H9 Vacant building credit</p> <p>Policy H108 <u>Redevelopment</u> Loss of existing housing and estate regeneration <u>redevelopment</u></p>	Consistency with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Policy H449 Ensuring the best use of stock</p> <p>Policy H4210 Housing size mix</p> <p>Policy H4311 Build to Rent</p> <p>Policy H4412 Supported and specialised accommodation</p> <p>Policy H4513 Specialist older persons housing</p> <p>Policy H4614 Gypsy and Traveller accommodation</p> <p>Policy H4715 Purpose-built student accommodation</p> <p>Policy H4816 Large-scale purpose-built shared living</p>	
MiM126	6.2 Housing	6.2.31, pg.288	<p><i>Amend last sentence of para 6.2.31 to read:</i></p> <p>These will assist in <u>helping provide more certainty of getting closer to or ideally exceeding</u> Brent's London Plan target of 29,150 <u>a minimum of 23,250</u> dwellings in the period to 2028/29.</p>	Consistency with London Plan.
MiM127	6.2 Housing	6.2.32, pg.288	<p><i>Amend first sentence of para 6.2.32 to read:</i></p> <p>National policy requires that <u>assessment of</u> both the potential to achieve the Local Plan housing target and its actual delivery is undertaken on an annual basis.....</p>	Clarity.
MiM128	6.2 Housing	6.2.32 London Plan, pg.288	<p><i>Remove London Plan policy from list:</i></p> <p>Policy H2A Small Housing Developments</p>	Consistency with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM129	6.2 Housing	6.2.33, pg.288	<p><i>Amend para 6.2.33 to read:</i></p> <p>In addition to the Growth Areas and Site Allocations <u>in the Plan, consistent with national and London Plan policy, town centres and areas with higher levels of public transport accessibility, some of which the Council has also identified as intensification corridors with the potential for increased building heights to encourage small sites windfall residential development, are priority areas for the provision of the additional homes required. The intensification corridors have been identified not only on the basis of their public transport accessibility (PTAL3 or above) but also their capacity in terms of their existing character (taking account of matters including current built form, width of roads and relationships with adjoining buildings), accessibility to social infrastructure and environmental factors related to providing an acceptable residential environment. Where these priority areas for additional homes are adjacent or along the borough boundary, the council will work with adjoining boroughs and the OPDC to identify consistency of approach to development and infrastructure that might be required to serve areas that straddle boundaries. As well as meeting housing needs, it is recognised that additional homes and their residents can bring other benefits to areas, such as their regeneration, or in the case of town centres, bring additional activity to an area. Nevertheless, non-residential uses can also play an</u></p>	Grammar. Consistency with Policy BD2 and its justification.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			important role in an area. They can add to the vitality and viability of these places and in meeting employment and other needs of the population, businesses and other groups. Residential development tends to be a higher monetary value use that can displace other not so financially valuable uses.	
MiM130	6.2 Housing	6.2.37, pg.290	<i>Amend fourth sentence of para 6.2.37 to read:</i> The London Plan Policy H1311 sets out the criteria for a development to be defined as Build to Rent, including a minimum size of 50 dwellings.	Consistency with London Plan.
MiM131	6.2 Housing	6.2.38, pg.291	<i>Amend para 6.2.38 to read:</i> To limit risks of unintended consequences of this policy expectation, where there are genuine reasons why on-site provision might cause unintended consequences some flexibility is allowed. <u>This might be for example if a site owner/developer has made genuine attempts to work with a build to rent operator but has been unsuccessful in being able to come to an agreement, meaning likelihood of significant programme delays which where provision is likely to be severe for housing delivery overall. Alternatively it could be if the inclusion of a build to rent element within the scheme can be evidenced to adversely affect viability to such an extent that it significantly undermines or affordable housing provision.</u> At the other extreme, the council does not wish to see all large scale development sites coming	More detailed policy justification consistent with the policy criteria.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			forward as build to rent. It wants to encourage additional home ownership opportunities within the borough for those that can afford it. Again this is part of its desire to see balanced and mixed communities where people have a long term commitment to the area and thus are likely to contribute more fully towards its social cohesion.	
MiM132	6.2 Housing	After 6.2.38 London Plan	<i>Amend London Plan policy to read:</i> LONDON PLAN Policy H1211 Build to Rent	Consistency with London Plan.
MiM133	6.2 Housing	6.2.43, pg.292	<i>Amend first part of para 6.2.43 to read:</i> London Plan Policy H65 sets a threshold approach to affordable housing provision to remove the need for viability assessment. The affordable target is set and assessed on the basis of the percentage of the development's habitable rooms, or if there is a disparity between affordable and private room sizes, the habitable floorspace. Policy H76 sets out the Mayor's minimum requirements in terms of tenure for 60% of the affordable housing sought.	Consistency with London Plan.
MiM134	6.2 Housing	6.2.44, pg,292	<i>Amend first sentence of para 6.2.44 to read:</i> The council is very supportive of the Mayor's long term 50% affordable housing target and in the interim the fast track approach as set out in policy H65 as a tool towards achieving the 50% on all sites in the longer term.	Consistency with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM135	6.2 Housing	6.2.46, pg.293	Remove last sentence from para 6.2.46: In these situations, where the case is proven, flexibility will be shown on the part of the council to allow a move away from the preferred tenure of social rent/ London Affordable Rent. This will however be to homes that will still be affordable to those that are able to receive housing benefits.	Clarity and consistency with 6.2.47
MiM136	6.2 Housing	6.2.48, pg.293	<i>Amend first sentence of para 6.2.48 to read:</i> London Plan Policy H1311 sets out a requirement for 30% of the affordable dwellings within a build to rent scheme to be at London Living Rent levels.	Consistency with London Plan.
MiM137	6.2 Housing	6.2.50, pg.294	<i>Remove fourth sentence from para 6.2.50 to read:</i> The extent of affordable housing need in Brent is very great. Small sites are expected to contribute a significant number of homes to meeting Brent’s housing target. The Local Plan viability study indicates that minor developments (of under 10 dwellings) are sufficiently viable to provide some affordable housing. London Plan Policy H6 identifies that boroughs for a number of reasons should only seek to address affordable housing requirements on minor developments through a tariff approach to off-site contributions. The level of contribution sought will be identified in an Affordable Housing Commuted Sum calculator made available on the council's website.	Consistency with London Plan Secretary of State direction to modify.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM138	6.2 Housing	6.2.53, pg.294 London Plan	<i>Amend London Plan policies to read:</i> LONDON PLAN Policy H76 Affordable housing tenure Policy H87 Monitoring of affordable housing Policy H1311 Build to Rent	Consistency with London Plan
MiM139	6.2 Housing	6.2.54, pg.295	<i>Amend first sentence of para 6.2.54 to read:</i> In terms of dwelling sizes Brent's predominant needs (6554%) are more for larger sized (3 bed or more) family dwellings.	Factual - reflects 2018 Brent SHMA.
MiM140	6.2 Housing	6.2.56 London Plan, pg.295	<i>Amend London Plan policies to read:</i> LONDON PLAN Policy H1210 Housing size mix	Consistency with London Plan
MiM141	6.2 Housing	6.2.61, pg.296	<i>Amend third sentence of para 6.2.61 to read:</i> Where self-contained rooms are proposed they will be assessed against London Plan Policy D46 <u>Housing Quality and standards</u> .	Consistency with London Plan
MiM142	6.2 Housing	6.2.63, pg.297	<i>Amend para 6.2.63 to read:</i> Affordable housing requirements will be applicable to qualifying proposals for accommodation classified as C3 under this policy. Student accommodation is also subject to affordable requirements, as set out in London Plan Policy H1715. Shared living affordable housing requirements are set out in London Plan Policy H1816.	Consistency with London Plan

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM143	6.2 Housing	6.2.69, pg.298	<p><i>Amend para 6.2.69 of 'Houses in Multiple Occupation (HMOs)' to read:</i></p> <p>Houses in Multiple Occupation (HMOs)</p> <p>HMOs must meet the standards of Brent's HMO licensing scheme, including minimum room sizes. These sizes have been developed in accordance with the Housing Act 2004. To reduce the potential for over-concentration the policy adopts a simple approach of seeking to allow no more than 4 of any 11 adjacent 3 of properties being HMOs <u>where three already exist in the ten nearest properties to the application property. This is measured taking the nearest front entrances when walking from the front door of the application property (so this is likely to exclude properties that share a rear garden boundary with the application property for instance). Each individual flat is regarded as one property for the purposes of this calculation. Where the application property is a flat, flats on the same floor are counted first within the ten. For houses this will be taken as 5 self-contained dwellings on each side on the proposal on the same side of the street, or as far up to 5 as possible with the remainder of the 10 on the property's other side. For flats the test will apply to adjacent self-contained properties sharing the same entrance, and if these do not add up to 11, then neighbouring properties.</u> The landlords will be expected to register properties in conformity with the council's</p>	Consistency with amended policy wording and to provide greater clarity on how Build to Rent schemes will be dealt with where properties are expected to be let to sharers

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>licensing scheme. In Build to Rent developments (as defined in the London Plan Policy H13) the Council is aware that operators may want to rent some self-contained properties to sharers and that it would be an unnecessary burden on both the Council and the developer to require planning permission for each change of use from self-contained dwelling to House in Multiple Occupation. As such the Council will seek to work with Build to Rent schemes to ensure that there is sufficient flexibility in planning permissions to ensure that an agreed number of dwellings can be used as Houses in Multiple Occupation at any one time.</p>	
MiM144	6.2 Housing	6.2.71, pg.298	<p><i>Amend last sentence of para 6.2.71 to read:</i></p> <p>The London Plan has detailed policy H1815 in relation to student accommodation.</p>	Update policy with London Plan.
MiM145	6.2 Housing	6.2.72, pg.299	<p><i>Amend para 6.2.72 to read:</i></p> <p>Other than in exceptional circumstances proposals should not result in the loss of permanent self-contained accommodation with shared facilities or additional support. <u>Such accommodation which provides care</u> will be protected unless it is no longer needed in the borough or it is <u>replacing unsatisfactory accommodation that and</u> cannot be brought up to current standards. Given the likely need for additional supported housing</p>	Ensuring consistency of policy justification with policy content.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>within the borough, the council is keen to ensure that the opportunity to reuse <u>supported housing</u> sites or those with planning permission for supported accommodation are considered and given the opportunity to occupy these sites. This could be in its existing or reconfigured/ redeveloped form on the site. As such the owner will be expected to work with the council and use reasonable endeavours to test these opportunities with potential end users prior to, if this proves to be unsuccessful, accepting the potential for other non-supported uses being considered/ taken forward.</p>	
MiM146	6.2 Housing	6.2.76, pg.299, London Plan	<p><i>Amend London Plan policies to read:</i></p> <p>LONDON PLAN</p> <p>Policy D46 Housing quality and standards</p> <p>Policy H1412 Supported and specialised accommodation</p> <p>Policy H1715 Purpose-built student accommodation</p> <p>Policy H1816 Large-scale purpose-built shared living</p>	Consistency with London Plan
MiM147	6.2 Housing	6.2.77, pg.300	<p><i>Amend para 6.2.77 to read:</i></p> <p>The SHMA identified a need for more specialist accommodation to meet the needs of the growing numbers of older people. The London Plan sets an annual specialist housing for older people <u>benchmark figure</u> target for Brent of 230 dwellings. The Brent SHMA</p>	Consistency with London Plan terminology.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			provides further detail and identifies that this will be across a range of products, including the traditional sheltered to schemes with increasing levels of support, such as extra care or specialist such as dementia.	
MiM148	6.2 Housing	6.2.78, pg.300	<p><i>Amend para 6.2.78 to read:</i></p> <p>Specialist older people’s housing is provided by both the market, registered providers such as the council and Housing Associations and charities. More often than not however most models cannot compete directly with private sector led build for sale homes in the land market. As such the council is seeking to ensure that the potential for them to gain access to sites is made available through this policy. A specific percentage for <u>all individual sites across the borough</u> is not considered appropriate in policy as the models of delivery of specialist accommodation will vary related to delivery models reflective of needs. <u>It may for example that an Extra-care scheme typically require a large number of dwellings to allow on-site provision of a range of support services to residents, whilst those with limited support or at the greater scale of intervention can be smaller in scale. On individual sites in Growth Areas it is therefore accepted that some may provide more housing for older people than others, although the emphasis will be on providing 10% overall. Given that many types of older people’s schemes are supported by Registered Providers, there might well also be opportunities to</u></p>	Reflects modification of target being set for sites over 500 dwellings and provides detail on range of accommodation types that might require different approaches.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>consider to what extent affordable housing requirements on sites can be tied into potential older people's housing provision.</u> As such the Council will seek evidence from the developer that they have made best endeavours from the outset to consider and accommodate a range of types of specialist older people's housing in Growth Areas and on large housing capacity sites. South Kilburn is excluded from this policy due to the need to re-house the existing population within social rent properties which requires significant levels of subsidy generated by conventional market housing sales.</p>	
MiM149	6.2 Housing	6.2.78a, pg.300	<p><i>Insert new para 6.2.78a after 6.2.78 to read:</i></p> <p><u>The inclusion of older people's housing will play a part in creating mixed and balanced communities. The Housing Learning and Improvement Network (Housing LIN) provides a good source of information on high quality and innovative housing solutions for an aging population. Guidance has been produced by HAPPI (Housing our Aging Population Panel for Innovation) that gives examples of how to design homes so that they better meet users' needs. It also shows how they can be positively integrated into places to encourage the benefits that interaction creates between occupiers of the dwellings and the wider community.</u></p>	Increased guidance.
MiM150	6.2 Housing	6.2.78, pg.300, London Plan	<i>Amend London Plan policies to read:</i>	Consistency with London Plan

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			LONDON PLAN Policy H15 13 Specialist older persons housing	
MiM151	6.2 Housing	6.2.84, pg.302, London Plan	<i>Amend London Plan policies to read:</i> LONDON PLAN Policy H16 14 Gypsy and Traveller accommodation	Consistency with London Plan
MiM152	6.2 Housing	6.2.85, pg.303	<i>Amend para 6.2.85 to read:</i> The housing targets for Brent will be challenging to achieve. Loss of existing housing to make way for other forms of development would exacerbate this. London Plan Policy H10 8 deals with the redevelopment loss of existing housing and estate regeneration <u>redevelopment</u> . Brent seeks to supplement this policy by providing greater clarity on locally specific additional limited circumstances it is likely to consider such loss appropriate.	Consistency with London Plan
MiM153	6.2 Housing	6.2.89, pg.303, London Plan	<i>Amend London Plan policies to read:</i> LONDON PLAN Policy H10 8 Redevelopment Loss of existing housing and estate regeneration <u>redevelopment</u>	Consistency with London Plan
MiM154	6.2 Housing	6.2.91, pg.304	<i>Amend last sentence of para 6.2.91 to read:</i> This size is used to ensure that the proposed dwellings within the development would be London Plan Policy	Consistency with London Plan – for clarity 4 has been struck through.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			D46 space compliant. Effort should be made to provide all additional flats with amenity space.	
MiM155	6.2 Housing	6.2.92, pg.305, London Plan	<i>Amend London Plan policies to read:</i> LONDON PLAN D46 Housing quality and standards	Consistency with London Plan – for clarity 4 has been struck through.
MiM156	6.2 Housing	6.2.95, pg.305	<i>Amend para 6.2.95 to read:</i> London Plan Policy D46 and also the Housing SPG give significant direction on the standards and quality that residential development is expected to achieve. In Brent all new housing should comply with the standards. Brent has a high proportion of overcrowded dwellings. It also has some very poor quality private rented accommodation. The council is taking measures through its statutory roles related to housing in improving the quality of residential accommodation in the Borough and the reducing the incidences of poor properties. Planning has a complementary role to play in reducing the opportunities for overcrowding to occur.	Consistency with London Plan and Grammar – for clarity 4 has been struck through.
MiM157	6.2 Housing	6.2.99, pg.306	<i>Amend first sentence of para 6.2.99 to read:</i> The London Plan Policy D46 sets out a baseline minimum standard amount for the provision of amenity space in	Consistency with London Plan– for clarity 4 has been struck through.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			new developments and the characteristics it is expected to have.	
MiM158	6.2 Housing	6.2.100, pg,306	<p><i>Amend last part of para 6.2.100 to read:</i></p> <p>As such flexibility could be allowed where it can be shown that all reasonable options for provision have been considered. In these cases, the quality of any communal space will need to be particularly high to show it can meet residents' needs. <u>Where not meeting the standards, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account factors such as, accessibility of dwellings to their own amenity space and its quality, the amount and quality of communal space, proximity to other areas of open space nearby and internal amenity spaces.</u> The calculation of amenity space does not include any parking, cycle or refuse and recycling storage areas.</p>	Clarity on how lower provision could be justified on more constrained sites, which might mean that the standard cannot reasonably be achieved.
MiM159	6.2 Housing	6.2.100, pg.306, London Plan,	<p><i>Amend London Plan policy to read:</i></p> <p>LONDON PLAN</p> <p>Policy D46 Housing quality and standards</p>	Consistency with London Plan – for clarity 4 has been struck through.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM160	6.4 Economy and town centres	6.4.9, pg.314	<p><i>Amend para 6.4.9 to read:</i></p> <p>The <u>West London Employment Land Evidence</u> London Plan identifies a need within Brent as having potential to provide for additional employment <u>industrial workspace floorspace capacity</u>. To achieve this, there will be a need to make better use of industrial sites and secure additional employment <u>industrial</u> floorspace elsewhere. This will be through intensification of SIL and LSIS to increase plot ratio to a minimum of 0.65; seeking an increase in employment <u>industrial</u> floorspace on non-designated industrial sites; securing new employment <u>industrial</u> floorspace in Growth Areas and through the diversification of town centres.</p>	Refer to Local evidence base. Clarity on industrial focus rather than more general employment.
MiM161	6.4 Economy and town centres	6.4.10, pg.314	<p><i>Amend first sentence of para 6.4.10 to read:</i></p> <p>The London Plan also emphasises the importance of town centres and seeks to promote and enhance their vitality and viability to create hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, social infrastructure and residential development.</p>	To correct.
MiM162	6.4 Economy and town centres	After 6.4.10, pg.314-315, London Plan	<p><i>Amend London Plan policy to read:</i></p> <p>LONDON PLAN Policy E7 <u>Industrial</u> Intensification, co-location and substitution</p>	Consistency with London Plan

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Policy SD87 Town Centres: Development principles and Development Plan Documents Policy SD78 Town Centres Network	
MiM163	6.4 Economy and town centres	6.4.11, pg.315	<p><i>Amend para 6.4.11 to read:</i></p> <p>The Granville in South Kilburn Growth Area is a good example of how workspace can support the local economy and foster a sense of community. The Granville is managed by South Kilburn Neighbourhood Trust, and was developed with support from the council and Mayor of London. It provides an affordable range of enclosed office, shared studio and dedicated desk space, as well as training opportunities for local people. Opportunities for additional affordable workspace will be sought in South Kilburn, where it does not prejudice the wider programme to provide new social rented housing for existing secure tenants. Securing workspace in Growth Areas will contribute to creating vibrant places where people want to live. It will also be important to meet the London Plan requirement <u>need</u> for Brent to provide additional employment <u>industrial</u> floorspace. <u>The Brent Workspace Study has established a need for additional industrial workspace to meet local needs, especially in Growth Areas.</u> All major developments exceeding 3000 sq.m in <u>employment floorspace in the</u> Growth Areas outlined above <u>in Policy BE1</u> should provide a minimum of 10% affordable workspace in the B-use class <u>studio, makerspace and light industrial uses.</u></p>	Consistency with London Plan - Brent no longer provide capacity borough, local evidence base shows need for additional industrial floorspace. Includes reference to local evidence base. Reflects use class changes.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>Where a site is both a Growth Area and a SIL/LSIS requirements in Policy BE2 takes precedence.</u>	
MiM164	6.4 Economy and town centres	6.4.12	<p><i>Amend first part of para 6.4.12 to read:</i></p> <p>Affordable workspace is workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. Affordable workspace should be provided for start-up companies or in the form of 'move on' space for SMEs. B1(e) Light industrial floorspace will be prioritised to meet the identified need for this form of employment workspace in the borough. An Affordable Workspace Operator should be engaged at the earliest stage, before pre-application advice is sought, to ensure space is fit for purpose. The council's list of approved Affordable Workspace Operators seeking space in the borough is available at: www.brent.gov.uk/your-community/regeneration/affordable-workspace. If an operator is identified that is not on the list, they can apply to be registered. Affordable workspace will be secured for the lifetime of the development. The applicant should submit evidence of having consulted with an approved Affordable Workspace Provider <u>Operator</u> to determine the design of the space is suitable and that it is affordable, at no more than 50% of</p>	Reflects use class changes and consistency with policy BE1 <u>and removes shorter lease period which is not preferred</u> . Grammar and consistency of terminology.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			comparable local market rate. Each lease should cover a period of at least 10–15 years.	
MiM165	6.4 Economy and town centres	6.4.15, pg.316	<p><i>Amend para 6.4.15 to read:</i></p> <p>Brent Works provides developers and businesses support in training and recruitment. This benefits the business by helping to provide access to a skilled, local workforce. It also ensures local people benefit from the employment, apprenticeship and training opportunities development can bring. Major developments will be required to produce an Employment, Apprenticeship and Training Plans <u>will be required</u> in line with guidance produced by Brent Works. Developers should engage with Brent Works at the earliest stage to discuss their needs.</p>	To correct to reflect policy BE1 and for clarity
MiM166	6.4 Economy and town centres	6.4.18, pg.318	<p><i>Amend para 6.4.18 to read:</i></p> <p>6.4.18 The <u>evidence base supporting the London Plan, the London Industrial Land Demand Study (LILDS) identifies a significant need for additional industrial premises across West London in the period to 2041. For Brent (including parts of the borough where OPDC is the planning authority) it identifies the need for an equivalent of 46.9 hectares of additional industrial land. The West London Employment Land Evidence 2018</u></p>	Consistency with London Plan and reflective of evidence base. Provides certainty on the extent to which industrial floorspace provision will be sought and expectations on individual industrial areas consistent with

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>(WLELE) commissioned by west London boroughs, including Brent, reviewed the LILDS. The WLELE identifies that additional capacity is required, but for a much smaller amount of 0.6 hectares. Consistent with national policy and the London Plan, the Council has to plan to meet the need for additional capacity as a provide industrial capacity borough. Demand is identified for light industrial, general industry and storage and distribution uses floorspace, with increased need principally related to the logistics sector in the use classes B1c, B2 and B8. The West London Employment Land Review (WLELR) identified demand for an additional 0.6ha of industrial floorspace, primarily to meet projected demand for logistics. In addition to this, a number of sites within designated industrial sites are protected for waste purposes as identified in the West London Waste Plan and the policies map. The London Plan sets a higher waste target for Brent than previously which may mean additional sites for waste purposes will be required. Consistent with its 'provide capacity' status Brent the Council is committed to exceeding this figure delivering an to increase in industrial floorspace to support growth in business and employment.</p> <p><i>Add new para 6.4.18a to read:</i></p>	<p>revised wording for Policy BE2.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>6.4.18a <u>There is a large divergence in the results of LILDS and WLELE. In relation to the LILDS, the London Plan provides no specific industrial land needs target for Brent or the OPDC. Park Royal as the preeminent industrial location in West London, with the associated higher rents and development values is the most viable area in the borough and West London to accommodate the London Plan’s emphasis on intensification of SIL. It is anticipated 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. Elsewhere the viability of intensification purely for industrial purposes is less clear and will need further assessment, although for co-location with other development including residential, it is more encouraging. 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</u></p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>authority and other boroughs/ stakeholders across west London if necessary. Notwithstanding this, w Within the area covered by this Local Plan Consistent with its 'provide capacity' status Brent the Council is committed to delivering an exceeding this figure to increase in industrial floorspace to support growth in business and employment. Currently, many of the borough's industrial sites are underutilised and include non-industrial uses. London Plan policy E7 requires d Development in SIL and LSIS which are not identified as suitable for co-location in policy BE2 provides an opportunity for the market to intensify industrial floorspace to meet needs. In these locations, loss of industrial floorspace will be resisted. In designated industrial areas identified as appropriate for co-location an increase of industrial floorspace to achieve a plot ratio to 0.65 (0.65 sq.m. of floorspace for each 1 sq.m. of site area) or the re-provision of the existing amount of industrial floorspace, whichever is the highest, will be sought. Such intensification will be instrumental to increasing industrial floorspace in the borough. Additional capacity will also be secured by where possible increasing floorspace on non-designated industrial sites (policy BE3), and securing workspace in Growth Areas and</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>secondary frontage of town centres (policy BE1 and BE4), and intensification of Park Royal which is being led by the OPDC. <u>The extent to which intensification and co-location will lead to an increase in industrial floorspace at this time is not known. Initial preliminary masterplan options work on Staples Corner in association with the GLA has shown addressing landownership and viability issues to incentivise and deliver additional floorspace is a complicated process. Nevertheless, the Council will undertake best endeavours to provide additional capacity in excess of the WLELE need, with a backstop position of not dropping below the 0.65 plot ratio within each defined industrial location.</u></p>	
MiM167	6.4 Economy and town centres	6.4.19, pg.318	<p><i>Amend para 6.4.19 to read:</i></p> <p>The West London Employment Land Review (WLELRE) identifies that whilst demand and viability will support intensification of industrial uses in some areas of SIL and LSIS, in others co-location is needed to incentivise intensification. Policy BE2 sets out Brent’s approach to co-location and intensification based on an analysis of SIL and LSIS in the WLELRE and Brent Industrial Land Audit. Policy BE2 is a starting point which identifies where co-location could be appropriate, but this would be subject to demonstrating the criteria in London Plan</p>	Brevity and consistency with naming of evidence base.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>policy E7 could be achieved through a masterplan-led approach. Critically, it will need to be demonstrated that co-location would achieve a plot ratio of 0.65. The council will work with its partners to develop masterplans for Church End, Neasden and Staples Corner. Where masterplans are developer-led, the developer will need to work closely with the council and GLA from the outset. Masterplans will need to be produced in accordance with the GLA Practice Note: "Industrial intensification and co-location through planned and masterplan approaches".</p>	
MiM168	6.4 Economy and town centres	6.4.20, pg.318	<p><i>Amend para 6.4.20 to read:</i></p> <p>In calculating what constitutes the minimum floorspace requirement required in any site's redevelopment <u>supported by a masterplan</u>, the existing employment industrial or warehousing floorspace or a plot ratio of 0.65 will be applied, whichever is the higher. Brent's employment areas contain a number of sui generis uses, such as trade merchants. These in the future could reasonably convert to other industrial uses to help meet demand for industrial, storage and warehousing. Therefore, for the purposes of calculating existing floorspace the council will include all floorspace within <u>office, research and development, light industrial, general industrial and storage and distribution</u> the B use class and closely related sui generis uses. Where a site has been long-term vacant or converted to uses which</p>	Clarity on masterplan requirement, focus on industrial uses and changes to the Use Classes Order.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			are not compliant with SIL and LSIS the level of floorspace will be based on plot ratio.	
MiM169	6.4 Economy and town centres	6.4.21, pg.319	<p><i>Amend para 6.4.21 to read:</i></p> <p>Local Employment Sites are sites outside of SIL and LSIS in employment use within the B-use class <u>office, research and development, light industrial, general industrial or storage and distribution</u> and closely related sui generis uses. They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy <u>in recognition of the need for additional industrial floorspace within the borough seeks to support the retention and intensification of Local Employment Sites for continued industrial use, consistent with policy E7 of the London Plan.</u> The policy allows for the release of unviable employment floorspace or, where appropriate, mixed-use development. This is consistent with the NPPF which requires the efficient use of land.</p>	Clarity on definition and extent to which they are required to support London Plan policy. Clarity following changes to the Use Classes Order.
MiM170	6.4 Economy and town centres	6.4.22, pg.319	<p><i>Add sentence at the end of para 6.4.22 to read:</i></p> <p>It must be demonstrated that consideration has been given to alternative layouts and business uses, including smaller premises with short term flexible leases appropriate for SMEs. <u>Where the Council accepts that a site is unviable for its retention for wholly employment</u></p>	To clarify that employment floorspace provision will be sought where wholly employment use is unviable.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>purposes, it will seek the re-provision of maximum amount of employment space that is viable in any development proposal.</u></p>	
MiM171	6.4 Economy and town centres	6.4.23, pg.319	<p><i>Amend para 6.4.23 numbering and text to read:</i></p> <p>6.4.23 Under criterion b of Policy BE3, in exceptional circumstances a mixed-use development incorporating non-employment uses may be appropriate. The applicant must demonstrate that redevelopment will result in:</p> <ul style="list-style-type: none"> a) <u>an increase in the amount of employment floorspace as defined in 6.4.21 on the site;</u> ab) the accommodation of the existing employment use, or all<u>provides the increased workspace is provided as affordable studio, research and development, light industrial or general industrial workspace with maker space in light industrial use prioritised to meet development needs of businesses in Brent, particularly SMEs;</u> b) an increase in the amount of employment floorspace on the site in the B use class; c) delivery of wider regeneration benefits to the community; and d) employment floorspace with a very strong prospect of being occupied. 	Clarification on the definition and clarity following changes to the use classes order.

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MiM172	6.4 Economy and town centres	6.4.24, pg.319	<p><i>Amend para 6.4.24 to read:</i></p> <p>As evidence the employment space will be occupied the council will require a letter of agreement from the current employment use operating from the site stating their intent to occupy the proposed floorspace. Alternatively, where the current occupier has agreed to relocate <u>the additional employment floorspace should be provided as</u> affordable workspace should be provided for start-up companies or 'move on' space for SMEs. B1(e)-Light industrial floorspace will be prioritised to meet the identified need for this form of employment space in the borough. Brent's requirements for affordable workspace as set out in <u>Policy BE1 and supporting paragraph 6.4.12</u> apply.</p>	Clarity around extra floorspace requirements and Reflects changes to use classes order and relationship with affordable workspace in policy BE1.
MiM173	6.4 Economy and town centres	6.4.25, pg.319	<p><i>Amend para 6.4.25 to read:</i></p> <p><u>For development of Local Employment Sites</u> in areas with existing or emerging creative clusters, <u>affordable workspace is to be provided on-site.</u> This is <u>These are</u> Harlesden, Wembley Growth Area, Willesden Green, Alperton Growth Area, Kilburn, Kensal Green, Neasden, Queen's Park, Burnt Oak Colindale Growth Area, and Church End Growth Area. Elsewhere in the borough if <u>the Council considers that</u> there is no demand for workspace <u>or that the space is unlikely to operate as affordable workspace over the longer term,</u> financial</p>	Clarifies that the paragraph refers to Local Employment Sites, and places emphasis on the desirability of workspace in site as opposed to off-site contributions. To ensure that viable affordable workspace is provided that meets needs for the longer term.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			contributions will be secured to re-provide equivalent affordable workspace employment floorspace elsewhere within existing or emerging creative clusters.	
MiM174	6.4 Economy and town centres	6.4.26	<i>Amend para 6.4.26 to read:</i> Work-Live is the combination of living accommodation (Use Class C3 defined as dwellinghouses in the use classes order) with workspace (office, research and development and light industrial uses Use Class B1 , but not B2 or B8) within a single self-contained unit. Applications for Work-Live development must be supported by a management plan agreed by the council which demonstrates the units will be managed by an organisation committed to their long term management primarily for employment. An indicative ratio of 70:30 in favour of the work element will be sought.	Clarity on what is live work taking account of changes within the use classes order.
MiM175	6.4 Economy & Town Centres	BE4, pg.320	<i>Formatting:</i> "DIVERSITY OF USES" should not be the policy title but is a heading related to the policy wording below of: "No further...."	To correct
MiM176	6.4 Economy & Town Centres	6.4.28, pg.321	<i>Remove para 6.4.28:</i> The policy approach will also be applied in assessing permitted development prior approval applications for change of use of existing town centre uses. The proportion of frontage is to be calculated based on the	Justification for section of the policy no longer being taken forward, and Use Classes which no longer exist.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			length of the primary frontage in metres in the centre as a whole. A1 uses are shops, A2 uses are financial and professional services, A3 uses are restaurants and cafes, A4 are drinking establishments and A5 are hot food takeaways.	Therefore needs to be removed.
MiM177	6.4 Economy & Town Centres	6.4.29, pg.321	<i>Amend first sentence of para 6.4.29 to read:</i> The policy outlines the council's approach to managing primary and secondary shopping areas <u>frontages</u> , town centre boundaries, and the mix of uses within frontages.	Use correct terminology.
MiM178	6.4 Economy & Town Centres	6.4.30, pg.322	<i>Amend first sentence of para 6.4.30 to read:</i> As referenced in the London Plan and Brent policy BHC4, the night time economy of Wembley has been identified as an area of National/ International importance, and those of, Cricklewood, <u>Kilburn</u> and Wembley Park as areas of more than local importance. It is therefore of special relevance to these centres that their leisure and entertainment functions are supported and enhanced.	Consistency with London Plan.
MiM179	6.4 Economy & Town Centres	6.4.32, pg.322	<i>Amend last sentence of para 6.4.32 to read:</i> Where it is desirable to maintain an active frontage the strong preference will be conversion to workspace in the B1 use class (office, research and development or light industrial <u>workspace</u> compatible with a residential environment} at ground floor with residential above.	Reflect changes to the Use Class Order.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM180	6.4 Economy & Town Centres	6.4.43, pg.324	<p><i>Amend para 6.4.43 to read:</i></p> <p>The need to prevent an over-concentration of takeaways is supported by national and regional policy as well as a growing evidence base. This is due both to health implications and to preserve the primary retail function of Brent's town centres. While it is acknowledged that takeaways provide a convenience service to local communities, the retail-based role of town centres must be preserved and so an upper limit of 6% of units in a centre's frontage being in A5 use takeaways has been set as well as a restriction on any new A5 uses takeaways within the designated primary frontage of a centre.</p>	Reflect changes to the Use Class Order.
MiM181	6.4 Economy & Town Centres	6.4.44, pg.324	<p><i>Amend para 6.4.44 to read:</i></p> <p>In order to prevent an over-concentration of A5 uses takeaways within the secondary frontage of the borough's town centres there is a requirement to have no less than three non-A5 uses takeaways between takeaways. This will maintain a diverse and viable high street offer and restrict impacts on amenity.</p>	Reflect changes to the Use Class Order.
MiM182	6.4 Economy & Town Centres	6.4.45, pg.324	<p><i>Amend para 6.4.43 to read:</i></p> <p>London Plan Policy E9 places restrictions on development proposals containing A5-hot food takeaway uses. Any new A5 uses takeaway within 400</p>	Reflect changes to the Use Class Order.

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			metres walking distance of an existing or proposed primary or secondary school should be refused.	
MiM183	6.4 Economy & Town Centres	6.4.46, pg.324	<p><i>Amend para 6.4.46 to read:</i></p> <p>Outside of town centres, neighbourhood parades and isolated shop units provide convenient access to goods and services which are needed on a day to day basis. To promote sustainable communities, the loss of retail and services <u>such</u> premises will be resisted in under-served areas.</p>	To reduce specificity to align with policy.
MiM184	6.4 Economy & Town Centres	6.4.47, pg.324-5	<p><i>Amend first part of para 6.4.47 to read:</i></p> <p>In determining applications for planning permission and change of use permitted development <u>to residential</u> prior approvals, development resulting in the loss of <u>ground floor</u> local retail-commercial, business and service provision will not be permitted unless there is alternative equivalent provision within 400 metres. This is considered a reasonable walking distance (5 minutes for the average person) to access convenience shopping and local services. <u>In the context of prior approval permitted development, a 'Key Shopping Area' is considered to be any area within a designated town centre frontage or a neighbourhood parade, as defined on the policies map.</u></p>	More specific about losses of ground floor active uses consistent with change to use classes order. Provide definition to 'Key Shopping Areas' as outlined in the GPDO, providing consistency to prior approval consideration.
MiM185	6.4 Economy & Town Centres	6.4.48, pg.325	<i>Amend para 6.4.48 to read:</i>	To reflect use class changes.

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			To protect the viability of the remaining retail <u>commercial, business</u> and service units within a parade, consideration will be given as to whether or not the proposal incurs a breakage in the parade's frontage.	
MiM186	6.4 Economy & Town Centres	6.4.49, pg.325	<i>Amend para 6.4.49 to read:</i> Where a loss of <u>commercial, business</u> retail or local service <u>to uses other than community uses</u> is allowed, the most appropriate alternative use would be housing. In considering applications for alternative uses, particular regard will be given to the possible effect on the amenity of adjoining residential properties. The council's Shopfronts SPD3 (June 2018) provides further guidance on sympathetically converting shops to residential units.	To reflect use class changes and better reflect the policy.
MiM187	6.4 Economy & Town Centres	BE9 Justification	<i>Move justification to after policy box.</i>	For structural clarity.
MiM188	6.4 Economy & Town Centres	Following 6.4.61, 328	<i>Amend list to read:</i> EVIDENCE BASE <ul style="list-style-type: none"> — Brent Employment Land Demand Study 2015, URS — Brent Workspace Study 2017, Regeneris — "West London Employment Land Review <u>Evidence-2019</u>, GL Hearn" — "West London Affordable Workspace Study, 2019 <u>Avison Young</u>" 	To correct

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> — Brent Retail & Leisure Need Assessment 2018, Urban Shape — “Brent Industrial Land Audit and Intensification Analysis 2019, Brent Council” 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM189	6.5 Heritage & Culture	Title Page	<p><i>Amend chapter number to read:</i></p> <p><u>“6.5 6.2”</u> Heritage and Culture</p>	Correct chapter reference.
MiM190	6.5 Heritage & Culture	6.5.2, pg.330	<p><i>Amend para 6.5.2 to read:</i></p> <p>The council is preparing <u>has prepared</u> an Historic Environment Place-Making Strategy which will enable a programme of review of heritage assets within the borough.</p>	Factual update.
MiM191	6.5 Heritage & Culture	6.5.11, pg.333	<p><i>Amend para 6.5.11 to read:</i></p> <p>London Plan policy HC5 Supporting <u>London’s</u> Culture and Creative Industries provides a sound overall basis on which to determine planning applications for the creation or loss of cultural facilities. It encourages boroughs to identify Creative Enterprise Zones, which was a Mayor initiative with associated funding. Brent bid for Willesden Green to be a Creative Enterprise</p>	Factual update.

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			Zone but was not successful. It is not clear if the Cultural Enterprise Zone initiative will continue. If it does the council may well seek to identify other areas where there is potential.	
MiM192	6.5 Heritage & Culture	6.5.13, pg.333	<p><i>Amend para 6.5.13 to read:</i></p> <p>In relation to pubs, <u>the Council wants to continue in seeking their protection or ensuring appropriate re-provision in developments.</u> from a planning policy perspective the existing Brent policy appears to be working well. Whilst there is a draft London Plan which contains a policy that seeks to protect public houses, it is not considered to be as detailed and therefore as robust as Brent's, so it is proposed to essentially take Brent's existing policy forward in its current form.</p>	Brevity.
MiM193	6.5 Heritage & Culture	London Plan, pg.333	<p><i>Amend London Plan policy to read:</i></p> <p>LONDON PLAN HC5 Supporting <u>London's</u> culture and creative industries</p>	Factual update.
MiM194	6.5 Heritage & Culture	6.5.18, pg.334	<p><i>Amend third sentence of para 6.5.18 to read:</i></p> <p>Its archaeological discoveries <u>to date</u> are scarce; sites have been built over and there are limited places where archaeologists could investigate.</p>	Acknowledge uncertainty.

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MiM195	6.5 Heritage & Culture	6.5.19, pg.334	Amend third sentence of para 6.5.19 to read: Policy BD4 <u>BHC1</u> therefore, specifically seeks to protect Brent's heritage.	Reference correct policy.
MiM196	6.5 Heritage & Culture	6.5.24, pg.335-6	Insert new para 6.5.24a after 6.5.24 to read: 6.5.24a It should be noted designation as a Locally Listed Building does not provide further statutory protection <u>where it is not in a conservation area</u> but it draws attention to the special <u>architectural, historic, streetscape and design</u> qualities of the building. <u>Development proposals that affect non-designated heritage assets will be required to demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset. Planning permission may be granted in cases where a proposal could result in harm to or loss of a non-designated heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance. Where it is accepted by the Local Planning Authority that demolition is acceptable, recording of the heritage asset should be undertaken and submitted alongside</u>	To better reflect the distinction in approach to designated and non-designated heritage assets. To be consistent with national policy and legislation.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>development proposals. Replacement buildings should draw upon the heritage elements of the previous design that made it significant within a suitable time frame. This may include the special qualities listed above.</u>	
MiM197	6.5 Heritage & Culture	6.5.26, pg.336	<i>Add new sentence at the end of para 6.5.26 to read:</i> Where development is proposed for a site which includes or has the potential to include heritage assets with archaeological interest, developers must submit an appropriate desk-based assessment and, where necessary, a field evaluation <u>in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works.</u> <u>Applicants should consult with Historic England's Greater London Archaeological Advisory Service in order to determine the scope of the archaeological requirements.</u>	
MiM198	6.5 Heritage & Culture	6.5.27, pg.336	<i>Amend para 6.5.27 to read:</i> London Plan Policy HC3 Strategic and Local Views requires local plans to clearly identify important local views. It advises boroughs to use the principles of HC4 London View Management Framework for the management of local views.	Correct policy reference.
MiM199	6.5 Heritage & Culture	6.5.29, pg.337	<i>Add new sentence at the beginning of para 6.5.29 to read:</i>	Provides clarity on how protected views can be

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			<p>17 views have been identified. Two views originate <u>outside the area where the Council is Local Planning Authority. The Council has made OPDC and LB Ealing aware of each view's origins and it will be for them to determine the weight to give to the importance of the views when considering proposed development in their respective areas.</u> London Plan policies and associated Supplementary Planning Guidance set out the key principles and methodology for information that needs to be supplied to support development proposed which could impact on views and the key considerations in determining whether it is acceptable.</p>	<p>addressed by neighbouring planning authorities when determining planning applications.</p>
MiM200	6.5 Heritage & Culture	After 6.5.32, pg. 337	<p><i>Amend London Plan policies to read:</i></p> <p>LONDON PLAN</p> <p>Policy HC3 Strategic and Local Views</p> <p>Policy HC4 London View Management Framework</p>	<p>Correct policy reference.</p>
MiM201	6.5 Heritage & Culture	6.5.38, pg.340	<p><i>Add new sentence at the end of para 6.5.38 to read:</i></p> <p>In addition, due to the contribution public houses make to the borough's local character and distinctiveness, policy BHC1 Brent's Heritage Assets will normally apply. <u>Whilst pubs have been in decline overall, in some other parts of London, with the increase in popularity of 'craft beers' new pubs have also more recently opened.</u></p>	<p>Reflects proposed modification to policy.</p>

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			<u>Should there be sufficient commercial interest in opening new pubs in Brent, the Council would be supportive, in accordance with the national 'sequential test' prioritising their location within town centres.</u>	
MiM202	6.5 Heritage & Culture	6.5.39 , pg.340	<p><i>Amend part a) of para 6.5.39 to read:</i></p> <p>a) the public house has been marketed for 24 months as a public house and for an alternative local community facility, at a price agreed with the council following an independent professional valuation (paid for by the developer) and there has been no interest in either the free-or lease-hold either as a public house <u>in the first instance</u> or as a community facility <u>for provision of medical or health services, crèche, day nursery or day centre or learning and non-residential institutions falling within 'D1' use class ;</u></p>	Reflects priority to retain the pub use, then community uses and also changes in Use Class Order under which community facilities now fall across a wider range of use classes.

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MiM203	6.6 Green Infrastructure and Natural Environment	6.6.2, pg. 343	<p><i>Amend para 6.6.2 to read:</i></p> <p>Brent currently has 103 public parks, which are of various sizes and typologies. They cover 463 hectares, equivalent to 1.39 hectares per 1,000 population. <u>This is well above</u></p>	Clarity to better reflect the evidence-base.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			the national FiT (Fields in Trust) target of 0.8 hectares of <u>parks and gardens per 1000 population</u> . If the current level of provision per person were to be maintained, an additional 86.4 hectares of public parks would be required to 2041.	
MiM204	6.6 Green Infrastructure and Natural Environment	6.6.10, pg.344	<p><i>Amend para 6.6.10 to read:</i></p> <p>Brent’s existing blue infrastructure or Blue Ribbon Network, includes the <u>Lower River</u>-Brent, Grand Union Canal – <u>Paddington Arm</u> and ,Welsh Harp, Wealdstone Brook, Brent Feeder Canal and Dollis Brook <u>and Upper Brent</u>. Water quality is of ‘moderate’ status in all waterbodies. This is as a result of pollution and physical modification from development, transport and the water industry. The ‘<i>Brent River Corridor Improvement Plan</i>’ seeks to ensure that rivers are of a ‘good’ status to support wildlife. The Grand Union Canal runs through an area of open space deficiency in the borough and is an important route in linking to other open spaces.</p>	Clarity and factual correction on named blue infrastructure
MiMo	6.6 Green Infrastructure and Natural Environment	6.6.12, pg.344	<p><i>Amend para 6.6.12 to read:</i></p> <p>..... Consistent with London Plan policy G5 Urban Greening all major <u>developments and as set out in Policy BH4 all new dwellings minor residential</u> development will be expected to have a minimum amount of green infrastructure.....</p>	Clarity on appropriate policy references

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MiM205	6.6 Green Infrastructure and Natural Environment	Evidence Base, pg.344	<i>Add in list of evidence base:</i> <u>Open Space, Sports and Recreation Study 2019</u>	Correction
MiM206	6.6 Green Infrastructure and Natural Environment	After Evidence Base, pg.344	<i>Add after list of evidence base to read:</i> <u>OTHER GUIDANCE</u> <u>Biodiversity Metric DEFRA/ Natural England</u> <u>Biodiversity net gain. Good Practice Principles for Development. A Practical Guide CIRIA/CIEEM/IEMA</u> <u>Mayor's guidance on Urban Greening</u>	Support for recognised guidance by Natural England/ Environment Agency/Mayor and factual update.
MiM207	6.6 Green Infrastructure and Natural Environment	6.6.22, pg.347	<i>Amend first sentence of para 6.6.22 to read:</i> The council's Food Growing and Allotments Strategy <u>2012</u> recommended that opportunities for temporary food growing are pursued. Integration of food growing opportunities into new major residential developments will be sought, taking into consideration the demand for provision within the area.	Clarity
MiM208	6.6 Green Infrastructure and Natural Environment	6.6.24, pg.348	<i>Amend para 6.6.24 to read:</i> In order to meet open space standards <u>identified in 'Shaping Neighbourhoods: Play and Informal Recreation' Supplementary Planning Guidance</u> , on-site provision will be required. The amount will be consistent with the policy <u>Where this cannot be achieved, a financial contribution in lieu will be required to ensure suitable provision through new or improved open space</u>	Clarity

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>elsewhere. The level of contribution sought will be identified and take account of other guidance such as 'Shaping Neighbourhoods: Play and Informal Recreation' Supplementary Planning Guidance. Management and maintenance of new open spaces needs to be considered from the start of the design process.</p>	
MiM209	6.6 Green Infrastructure and Natural Environment	6.6.25, pg.348	<p><i>Amend para 6.6.25 to read:</i></p> <p>The Open Space, Sport and Recreation Study (2019) sets standards to ensure that reflect that there is adequate open space provision across the borough. It sets open space requirements for each Growth Area. Outside of these, major <u>residential</u> developments within wards which now or through population growth will not achieve minimum standards of open space deficiency provision (i.e. Alperton, Brondesbury Park, Dudden Hill, Harlesden, Kensal Green, Kilburn, Mapesbury, Queens Park, Queensbury, Tokyngton Wembley Central or Willesden Green Ward) <u>should seek to maximise the opportunities on site to create publicly accessible open space with a range of sizes and for a range of users achieve 0.81 sqm of on-site publicly accessible open space per resident.</u> Major <u>residential</u> development in other wards <u>with adequate provision</u> should seek to <u>provide achieve 0.81 sqm of</u> publicly accessible open space provision <u>based on the need generated by the development per resident</u> unless the site is within 400</p>	Clarity

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			metres (by the most direct safe walking route to the nearest access point) of an existing publically accessible open space of a larger typology than can be provided on site, as identified on the policies map.	
MiM210	6.6 Green Infrastructure and Natural Environment	6.6.26, pg.348	<p><i>Amend para 6.6.26 to read:</i></p> <p>In both cases it may be acceptable for the council's residential private amenity standard of <u>50sqm per home for family housing (3 bedrooms or more) situated at ground floor level and 20 sqm for all other housing</u> 20 sqm minimum per dwelling or 50 sqm for a family home (3 bedrooms or more) to be off-set against any proposed on site publicly accessible open space, subject to a minimum of 5 sqm <u>London Plan standards of</u> private amenity space being provided for each dwelling. Where on site provision of publicly accessible open space is not feasible, the council will seek S106 contributions for enhancements to the quality of spaces taking account of the recommendations from the qualitative assessment that was carried out by Keep Britain Tidy in 2018.</p>	Reflects modifications to policy BH13 and variable London Plan minimum private amenity space standards depending on dwelling size.
MiM211	6.6 Green Infrastructure and Natural Environment	6.6.28 , pg.349	<p><i>Amend part a) of para 6.6.28 to read:</i></p> <p>a) Location and security – easily accessible by non-car means. Contribute to a sense of security by applying</p>	Correction consistent with London Plan

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			the principles of London Plan Policy D4011 'Safety, security and resilience to emergency'	
MiM212	6.6 Green Infrastructure and Natural Environment	6.6.30 , p.349	<p><i>Amend para 6.6.30 to read:</i></p> <p>6.6.30 In developments adjoining the borough's Blue Ribbon Network the council will pursue opportunities to improve public accessibility and its setting, both in relation to buildings and public realm. It should be noted that <u>as a result of the Environmental Permitting (England and Wales) (Amendment) (No2) Regulations 2016 a permit may be required for certain development adjacent to within 8m of a main river or its tributaries. As such, is required by the Environment Agency to have usually seek a minimum set back of 8m. Where existing set back is greater than 8m the higher distance ideally this should be maintained. This applies to all rivers and specifically to River Brent and Wealdstone Brook. This setback enables ease of general waterway maintenance, helps to create a sense of openness, protecting and offering the opportunity for the enhancement of habitats for wildlife. It also enables opportunity for sustainable and cost effective flood risk management options. Early engagement with the</u></p>	Clarity around the 8m set back adjacent to main river watercourses and watercourses with heritage value.

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			<p>Environment Agency, where applicable, is advised.</p> <p><i>Add new para 6.6.30a after 6.6.30 to read:</i></p> <p><u>6.6.30a The River Brent, which gives the borough its name, formed a natural division between Willesden and Wembley. The name 'Brent' is Old English, from Celtic words meaning 'sacred waters'. The River Brent is formed of a number of tributaries, which join and flow to the borough of Ealing. Despite much of it now being culverted, it is significant to Brent's history and culture. Just as important are the Grand Union Canal and Brent Feeder Canal which are completely artificial watercourses and important as historic transport infrastructure. By 1820 there was not enough water to supply the canal, so under an Act of Parliament in 1819, the Regent's Canal Company decided to dam the River Brent and create a reservoir, (known as the Welsh Harp Reservoir or Brent Reservoir) an artificial lake, in order to guarantee a sufficient water supply. These water landscapes are recognised as non-designated heritage assets for their historic significance to protect and enhance cultural and heritage value to Brent. Equally, so is the protection, promotion</u></p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p style="text-align: center;"><u>and enhancement of their curtilage, which impact on the setting of these heritage assets.</u></p>	
MiM213	6.6 Green Infrastructure and Natural Environment	6.6.31, pg.349-50	<p><i>Amend to add new sentence at beginning of para 6.6.31 to read:</i></p> <p><u>Canal Cottage, Twyford Abbey Road (now in OPDC area) and Reservoir Cottage, in Birchen Grove, are locally listed but much of the twentieth-century development and canal heritage is not protected, and in particular, deserves better recognition. For example, the canal is supported by two aqueducts, one as it passes over the River Brent, the Twyford Aqueduct and the other over the North Circular Road (A406). Other historic features of the canal include a WWII concrete pillbox, bridges and concrete drainage mechanisms.</u> The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will also need to balance the protection and enhancement of biodiversity and the multiple needs of the users of canal and towpath. In Brent, development adjacent to the Grand Union Canal in particular provides an opportunity to create new towpaths, public open spaces and access points. Early engagement with the Canal and River Trust for schemes adjoining the Grand Union Canal, <u>Welsh Harp</u> and the Brent Canal Feeder is advised.</p>	Clarity and Factual correction.

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MiM214	6.6 Green Infrastructure and Natural Environment	6.6.34, pg.350	<p><i>Amend first sentence of para 6.6.34 to read:</i></p> <p>The Water Framework Directive is a European Union Directive which commits all member states <u>are required to achieve achieving a 'good' status' or 'good ecological status by 2021, or if an extension is granted, then for all water bodies by 2027.</u></p>	Factual correction in line with Environment Agency requirement
MiM215	6.6 Green Infrastructure and Natural Environment	6.6.35, pg.350	<p><i>Amend first sentence of para 6.6.35 to read:</i></p> <p>In Brent <u>all</u> waterside developments and other developments which could negatively impact on water quality,</p>	Strengthen.
MiM216	6.6 Green Infrastructure and Natural Environment	6.6.38, pg.351	<p><i>Amend and add new sentence to para 6.6.38 to read:</i></p> <p>Consistent with London Plan Policy G7 Trees and Woodlands the council strongly encourages the retention of trees on development sites. If trees are located on or adjacent to a site, applicants should carry out a Tree Survey. The survey will need to accord to the standards set out in BS 5837 <u>Trees in relation to construction – Recommendations</u>. It should inform the design and layout of the development to ensure the long term retention of as many existing high and moderate quality trees as possible and should accord with the hierarchy of Avoid-Mitigate-Compensate. Where it is agreed with the council that the retention of trees is not possible, re-provision should be made on site of</p>	Clarity and better reflection of requirement

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>equivalent canopy cover. Where agreed to not be feasible, a contribution to off-site tree planting for equivalent canopy cover will be required. <u>Total canopy area of existing trees proposed to be removed will be measured from the tree survey. Developers should make proposals for new trees which, at time of planting, provide an equivalent canopy area to those removed. Taking account of the right species, wildlife value, planting location, availability of space, aftercare and growing conditions. This will need to be evidenced in the ecology assessment.</u></p>	
MiM217	6.6 Green Infrastructure and Natural Environment	6.6.39, pg.351	<p><i>Amend second last sentence of para 6.6.39 to read:</i></p> <p>BS 8545:2014 <i>Trees: from nursery to independence in the landscape - recommendations</i> should be used when choosing landscaping and devising management plans for trees within developments.</p>	Accuracy
MiM218	6.6 Green Infrastructure and Natural Environment	6.6.43, pg.352	<p><i>Amend para 6.6.43 to read:</i></p> <p>The council does not yet have full knowledge of the existing tree stock, and its quantified environmental and economic benefits. Developing a database such as i-tree Eco will provide a base line and enable setting future targets and a focus on tree deficient areas. <u>The council has recently developed an existing tree stock database informed by the i-tree Eco survey to quantify the</u></p>	Update

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>borough's existing tree stock's environmental and economic benefits.</u>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiMp	Sustainable Infrastructure	6.7.1, pg.355	<p><i>Amend para 6.7.1 to read:</i></p> <p>The majority of schemes which come forward within Brent adhere to the Draft new London Plan and Brent Council sustainability policies.</p>	Factual – reflecting adoption of London Plan
MiMq	Sustainable Infrastructure	6.7.4, pg.355	<p><i>Amend para 6.7.4 to read:</i></p> <p>.... There are currently four Air Quality Focus Areas (AQFA) in Brent including these are: Neasden Town Centre; Church End; Kilburn Regeneration Area; and parts of Wembley Central and Tokyngton.</p>	Factual and likely subject to change as part of emerging Air Quality Action Plan.
MiM219	Sustainable Infrastructure	6.7.5, pg.355	<p><i>Amend para 6.7.5 to read:</i></p> <p>Flooding can have major economic and social impacts on the borough's residents, as well as devastating environmental impacts. <u>Brent is susceptible to flooding from different sources.</u> Fortunately, over the last twenty years Brent has not experienced major flooding <u>from its brooks and rivers</u>, with the most recent events (2007 and 2010) occurring on the highway, open spaces and gardens. The Policies Map shows areas of the borough that are subject to fluvial and surface water flooding.</p>	Reference types of flooding as sought by Environment Agency.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM220	Sustainable Infrastructure	6.7.9, pg.355	<p><i>Add new sentence to para 6.7.9 to read:</i></p> <p><u>The Council made its “climate and ecological emergency” declaration in July 2019, promising to aim for carbon neutrality by 2030. It has delivered a new <u>Climate & Ecological Emergency Strategy 2021-2030</u>, which provides greater clarity on the actions that will be taken in Brent to address climate change.</u> In terms of clean generation, carbon reduction/energy efficiency and construction emissions, the council will aim to ensure all major developments accord with the London Plan’s policy objectives meeting renewable energy standards on site. There will be the wider delivery of established district wide CHP systems within the Wembley and South Kilburn Growth Areas. In addition, new district heating networks will be sought within the remaining Growth Areas.</p>	To identify added priority given to climate change by the Council in 2019 and adopted strategy.
MiMr	Sustainable Infrastructure	Pg 356 Below Policy BSUI1, London Plan	<p><i>Amend London Plan Guidance:</i></p> <p>Sustainable Design and Construction SPG <u>Mayor’s guidance on sustainable infrastructure</u></p>	To update with relevant London Plan guidance
MiMs	Sustainable Infrastructure	Pg 356 Para 6.7.14 and Para 6.7.15	<p><i>Amend London Plan Guidance:</i></p> <p>The Mayor’s <u>guidance on sustainable infrastructure</u> Sustainable Design and Construction SPG</p>	To update with relevant London Plan guidance

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM221	Sustainable Infrastructure	6.7.20, pg.358	<p><i>Amend para 6.7.20 to read:</i></p> <p>Policy SI2 of the London Plan requires major developments to be net zero-carbon, which is to be achieved through minimising carbon emissions in accordance with the energy hierarchy: Be Lean, Be Clean, and Be Green and Be Seen. The carbon reduction targets should be met on-site. Only where it is clearly demonstrated carbon reduction targets cannot be fully met on site, any shortfall may be off-set through local carbon offsetting.</p>	Consistent with London Plan
MiMt	Sustainable Infrastructure	BSUI2 London Plan pg 359	<p><i>Amend London Plan:</i></p> <p>Sustainable Design and Construction SPG The Mayor's guidance on air quality</p>	Factual update
MiMu	Sustainable Infrastructure	6.7.31, pg.361	<p><i>Amend para 6.7.31 first sentence to read:</i></p> <p>For major development to be 'air quality neutral' it must meet the building emissions benchmarks set out in the Mayor's guidance on air quality Sustainable Design and Construction SPG.....</p>	Factual update
MiMv	Sustainable Infrastructure	6.7.32, pg.361	<p><i>Amend para 6.7.32 second sentence to read:</i></p> <p>This is to be produced in accordance with the Mayor's guidance in the Mayor's SPG.</p>	Factual update
MiM222	Sustainable Infrastructure	6.7.34, pg.361	<p><i>Amend second last sentence of para 6.7.34 to read:</i></p> <p>The West London SFRA provides more detail of the requirements for <u>Flood Risk Assessments (FRAs)</u></p>	Clarity

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			undertaken to support development proposals in Brent. In accordance with national policy the sequential test will be applied to ensure development is steered to areas with the lowest probability of flooding.	
MiMw	Sustainable Infrastructure	6.7.39, pg.362	<p><i>Amend para 6.7.39 first sentence to read:</i></p> <p>The Draft new London Plan policy SI5 addresses the pressure on London's water supply related to existing scarcity which will be exacerbated by climate change and population growth.</p>	Factual update

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM223	6.8 Transport	6.8.6, pg.368	<p><i>Amend para 6.8.6 to read:</i></p> <p>The council will work closely with its partners including TfL, the West London Alliance and WestTrans to improve public transport access for all across Brent. A key priority is to improve orbital links from east to west through the West London Orbital (WLO) rail link. The link would use the existing Dudding Hill freight line to create an overground passenger line connecting Hounslow in the west to Hendon and West Hampstead in the east via Old Oak Common (Cross railElizabeth Line, Great Western Mainline and High Speed 2 stations), Harlesden, Church End, Neasden and Brent Cross West (Thameslink station).</p>	Factual

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>It will also be important that strong pedestrian links are created from surrounding stations into the borough. A pedestrian route over the A5 is needed to connect Brent Cross West station to Staples Corner. <u>The precise location of the WLO stations will be firmed up as the project progresses. When there is more certainty on their location more detailed work can be done on improving their connectivity to surrounding areas.</u> To the south the regeneration of Old Oak, being led by the Old Oak and Park Royal Development Corporation, is a key opportunity to improve connections from Harlesden to Old Oak and secure a much needed upgrade to Willesden Junction station. In addition, the council will continue to work with bus operators to improve coverage to key destinations and interchange facilities. It will be important that public transport is accessible to all, with step free access to overground and underground stations a key priority. Step free access will be introduced at Brondesbury Park and Queen’s Park Stations and feasibility work is being undertaken for Northwick Park.</p>	
MiM224	6.8 Transport	6.8.14, pg. 372	<p><i>Amend second sentence of para 6.8.14 to read:</i></p> <p>This includes mitigation on smalls scale schemes where issues are not caused by levels of generated traffic, but by poor design.</p>	Typo

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM225	6.8 Transport	6.8.16, pg.374	<p><i>Amend 'para 6.8.16 to read:</i></p> <p>London Plan policies T6 – T6.5 address parking and provide associated parking standards. For uses not covered by London Plan policy, local standards are set out in Appendix 4. The requirements for electric charging points and cycle parking are set out in London Plan policies <u>T5 and T6-T6.1</u>. A proportion of electrical charging points should be publicly accessible to all road users at all times to encourage greater use.</p>	Consistency with the London Plan.
MiM226	BT2	6.8.17, pg.374	<p><i>Amend first part of para 6.8.17 to read:</i></p> <p>The amount of parking provided in accordance with parking standards is a balance between a number of factors. These include seeking to reduce unnecessary car trips, promoting effective use of land, urban design and environmental quality, making development viable and not creating on street parking pressure which undermines quality of life. The standards promote fewer spaces in locations better served by public transport. The emphasis is on not trying to <u>only provide</u> spaces where they are unnecessary. <u>The starting point should always be a 'car-free' development.</u> Opportunities for car free development might include locations close to public transport interchanges where space for parking is constrained.</p>	Grammar and to reflect London Plan policy T6-Car Parking

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM227	BT2	After 6.8.19, pg.374	Amend 'National & London Plan' policies to read: NATIONAL & LONDON PLAN London Plan Policy T6 Car parking Emerging Design of Car Parking, TfL	Consistency with remainder of Plan and removal of guidance that has not been taken forward.
MiM227a	BT2	6.8.20	Amend paragraph by adding a new fifth sentence: "...Larger developments should include facilities to enable micro-consolidation. <u>This should be considered as part of a wider approach, and include sustainable last mile deliveries, including where appropriate prioritising the use of cargo bikes.</u> "	To reflect modifications to Policy BT2 re: cargo bikes.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM228	7 Delivery and Monitoring	7.1.6, pg.381	Amend para 7.1.6 to read: The council in the Plan has sought to plan as best as it can to meet housing needs. As identified by the council's evidence base, there is a chronic need for affordable housing. This is well beyond the private sector's and planning policy's ability through S106 planning obligations to assist delivery through cross subsidisation <u>subsidy</u> on development sites. Realistically the deficit can only be addressed through greater public sector investment than is currently available to Registered Providers (housing associations) and the council. The council will nevertheless continue through	Grammar and supplementary information

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			looking at the potential of its own housing estate, but also through direct provision through an arm's length delivery vehicle (<u>company name: I4B</u>) in assisting delivery.	
MiM229	7 Delivery and Monitoring	7.1.8 , pg.381	<i>Amend first sentence of para 7.1.8 to read:</i> The London Plan identifies the risk associated with the delivery of new strategic transport projects and on-going funding for supporting and expanding existing services.	Correct spelling
MiM230	7 Delivery and Monitoring	7.1.15, pg.382	<i>Add new sentence at the end of para 7.1.15 to read:</i> <u>There is the potential for expansion of healthcare provision in the Brent area to support growth in adjacent communities and vice versa. The Council and the Brent CCG will work with adjoining boroughs (and OPDC) and relevant CCGs to ensure suitable and timely provision of necessary facilities.</u>	Acknowledge cross-boundary working/ provision as identified by OPDC
MiM231	7 Delivery and Monitoring	7.1.18, pg.384	<i>Amend last sentence of para 7.1.18 to read:</i> As in many cases this is non-statutory work, it is likely to be subject to increased budgetary pressures, which will result in amendments to management regimes and different ways of trying seeking to support their continued high quality provision.	Grammar corrections

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
MiMx	Appendix 1	Pg.388	Amend Title to: APPENDIX 1 – <u>Removed as part of examination main modifications subsequent appendices kept with original references</u>				To provide clarity why title retained despite contents being removed to not change subsequent appendices referenced in policies.
MiM232	Appendix 2	Pg.389	<u>SCHEDULE THAT SHOWS HOW LONDON PLAN DESIGN POLICY AND BRENT SPD1 DESIGN PRINCIPLES ARE INTER RELATED</u>				To provide greater clarity on what the Appendix is for.
MiM233	Appendix 2	Pg.389	London Plan policy (amended Jul 2018)	SPD1 guidance (adopted Nov 2018)	SPD1 principles	London Plan policy	Reflects final policy numbering of London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification		
			D4B3 OPTIMISING SITE CAPACITY THROUGH THE DESIGN- LED APPROACH	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D4B3, D89, G1		
				3.1 Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D4B3, D46, D89		
				3.2 Animated facades	Development should ensure active frontage and maximise doors and windows to active ground floor rooms.	D4B3, D46		
				3.3 Urban grain	New development should respect existing urban grain and human scale.	D1,		

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification
			3.4 Roofscape	Building roofs should be designed to minimise the impact of height and positively respond to the character of the area.	D1,	
			3.5 Proportions	Buildings, including window dimensions and void-mass ratio, should be well proportioned; respecting local character.	D1	
			3.6 Building materials	Building materials should be durable, attractive and respect local character.	D1	
			4.1 Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D46, D78	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification
			4.2 Parking	New developments should provide a suitable amount of parking in a mix of parking solutions that are convenient, efficient and facilitate good urban design.	D1, D78	
			4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7	
			4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D78, G5	
			4.5 Public realm	Street design and public realm should reflect the street hierarchy and accommodate for movement and the street as a place accordingly.	D1, D78	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification	
				4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D78, G1	
		D46 Housing quality and standards	3.1 Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D4B3, D46, D89		
	3.2 Animated facades		Development should ensure active frontage and maximise doors and windows to active ground floor rooms.	D4B3, D46			
	4.1 Block structure and active frontage		New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D46, D78			

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification	
				5.1 Privacy and amenity	New development should provide adequate privacy and amenity for new residents and protect those of existing ones.	D46	
				5.2 Private outdoor space	New development should provide good levels of private outdoor space and well-designed communal amenity space for new residents.	D46	
				5.3 Bins and bike storage	Services, bin and bike storage, should be designed as part of the building envelope wherever possible; minimising visual impact on the streetscene.	D46	
				5.4 Space standards	New development should provide adequate space, access and orientation and adhere to the relevant space standards.	D46	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification	
				5.5 Lighting and noise	Buildings and spaces should be designed to minimise potential noise and light pollution.	D46	
			D78 Public realm	4.1. Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D46, D78,	
				4.2 Parking	New developments should provide a suitable amount of parking in a mix of parking solutions that are convenient, efficient and facilitate good urban design.	D1, D78,	
				4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D78, G5	
				4.5 Public realm	Street design and public realm should reflect the street hierarchy and accommodate for movement and the street as a place accordingly.	D1, D78,	
				4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D78, G1	
			D89 Tall buildings	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D4B3, D89, G1	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification	
				3.1. Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D1B3, D46, D89	
			G1 Green infrastructure	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D1, D89, G1	
				4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D78, G1	
			G5 Urban greening	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D78, G5	
			G7 Trees and woodlands	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7	
MiM234	Appendix 4	Pg.393	<u>BRENT PARKING STANDARDS TO BE USED IN ASSOCIATION WITH POLICY BT2 PARKING AND CAR FREE DEVELOPMENT WHICH ARE CONSIDERED NECESSARY RELATED TO BRENT'S CHARACTERISTICS RATHER THAN THOSE IN THE LONDON PLAN.</u>				Provides greater clarity on link between Appendix 4 and the Policy BT2.
MiM235	Appendix 4	8.4.1, Pg.393	Parking standards for <u>Class E(g)(i) uses or B1a uses</u> in <u>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. For other employment uses in the B and Class E(g)(ii) and Class E(g)(iii) 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</u>				Reflects changes in use class order 2020 whilst retaining use classes as identified in the London

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification									
			<p>borough to the north and the south of the Dudding Hill railway line as this broadly reflects variations in public transport provision.</p> <p>8.4.2 The provision of parking in new developments below the standards set out in the table is encouraged (see car free/car capped section).</p> <table border="1"> <thead> <tr> <th>LOCATION</th> <th>DEFINITION</th> <th>MAXIMUM PARKING STANDARD</th> </tr> </thead> <tbody> <tr> <td>Inner Brent</td> <td>South-east of Dudding Hill railway line</td> <td>1 space per 800m2 gross floor space</td> </tr> <tr> <td>Outer Brent</td> <td>North-west of Dudding Hill railway line</td> <td>1 space per 200m2 gross floor space</td> </tr> </tbody> </table> <p>Table 1 – Employment Maximum Parking Standards</p>	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	Plan policy. Also reflects agreed position as part of the examination with TfL on office and other employment parking standards.
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											
MiM236	Appendix 4	Pg.393, 8.4.5 c)	one coach parking space should be provided for every 50 <u>75</u> bedrooms.	Correction									
MiM237	Appendix 4	Pg.394, 8.4.9	<p>Parking for non-residential institutions (D1)</p> <p>This category covers places of worship, health centres, nurseries and museums, all with varying parking requirements. For all D1 <u>non-residential institution</u> uses, up to 1 car parking space may be provided per 10 users/visitors on site at any one time.....</p>	Reflects changes in use class order 2020 whilst retaining reference to non-									

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
				residential institutions as these uses are now split across different use classes.
MiM238	Appendix 5	Pg.395	<u>"BRENT NON RESIDENTIAL PREMISES SERVICING STANDARDS AS REQUIRED IN ASSOCIATION WITH POLICY BT3 'FREIGHT AND SERVICING, PROVISION AND PROTECTION OF FREIGHT FACILITIES'."</u>	Provides greater clarity on link between Appendix 5 and the Policy BT3.
MiM239	Appendix 5	Pg.395, 8.5.1	A4 <u>E(a)</u> Retail For A4 retail units less than 500m2 gross floor area, one transit sized bay for service vehicles should be provided.	Reflects changes in use class order 2020
MiM240	Appendix 5	Pg.395, 8.5.3 Heading	A3 <u>E(b)</u> Food and Drink Establishments	Reflects changes in use class order 2020
MiM241	Appendix 5	Pg.395, 8.5.4 Heading	B4 <u>E(g)</u> Business	Reflects changes in use class order 2020