STATEMENT OF CONSULTATION

Church End Growth Area (CEGA)

Masterplan Supplementary Planning Document (SPD)

May 2023

This document sets out the public consultation that took place for the draft Church End Growth Area Masterplan SPD, summarises the representations received and the Council's response.

Introduction

Church End Growth Area (CEGA) is a priority growth area in the Brent Local Plan. Regeneration in CEGA aims to provide at least 1,300 new homes, employment and supporting infrastructure, including green space, transport, community facilities, and an enhanced public realm. This vision will be achieved through the co-location of industrial and residential uses. Through a 'master planning approach', the CEGA Masterplan Supplementary Planning Document (SPD) has been prepared to guide the comprehensive development of the area.

The Masterplan SPD sets out the vision, policy context and the urban design framework; comprising development, sustainability and environmental principles that will guide future comprehensive development of the area. It gives a positive message that Brent welcomes and encourages new development of high-quality sustainable design and recognises the benefits that it can bring to communities. It aims to assist developers, designers, local communities, planning officers and those determining planning applications to understand better what is expected of new developments in CEGA depending on its surrounding context and how regeneration can be achieved holistically.

Initial engagement activities took place via online platforms because of coronavirus lockdown restrictions in place at the time. As lockdown restrictions were eased, face to face engagement events took place and have informed the development of the Masterplan SPD.

Activities that have informed this process included:

1. Interviews with people living and working in Church End and community groups
2. An online platform for gathering feedback about the area: Join the Local Conversation – Church End Regeneration – Commonplace
3. The development of a documentary produced by local young people: Regeneration Gap - YouTube
4. Interactive workshops with people living and working in Church End, businesses and affordable workspace providers, and community groups
5. Targeted engagement with landowners
6. Businesses survey
7. Activity with Leopold Primary School
8. A targeted session with Brent Mencap Politics and Disabilities Group
9. Two outdoor engagement activities in different parts of the Masterplan process, and
10. Four face-to-face events part of the statutory consultation process.

This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town & Country Planning (Local Planning) (England) Regulations 2012 (the Regulations). It sets out details of the consultation that took place and which has informed and refined the SPD.

A summary of the events and how they have informed the SPD can be found at the back of this document.

About the Statutory Consultation

The CEGA Masterplan SPD was subject to 7 weeks of formal consultation from 22 September 2022 to 10 November 2022. This was in accordance with the Regulations and the Council's Statement of Community Consultation (SCI). This Consultation Statement sets out the comments received, the Council's response and where appropriate consequential changes made to the SPD. In accordance with the SCI, during the consultation period, the following process was adhered to:

- The draft Masterplan SPD, details of the project and how to get involved were showcased on a dedicated website: https://haveyoursay.brent.gov.uk/en-GB/projects/church-end-masterplan-supplementary-planning-document/4

- 1500 promotional flyers were distributed to residents and businesses within the CEGA boundary. Individual flyers were also handed out during the four consultation events.

- The consultation was publicised via social media channels- Facebook, Twitter and LinkedIn.

- Copies of the draft Masterplan SPD were available to view at Wembley, Willesden, Ealing Road and Kingsbury libraries (Harlesden was closed under-going refurbishment), alongside copies of the feedback form.

- Stakeholders and groups on the Local Planning Authority consultation database were emailed, notified of the consultation and consultation events, and invited to comment and attend the consultation events.

- Dedicated consultation updates sent to all local ward councillors to promote the consultation and events

- Four drop-in sessions were organised in different times and locations within CEGA area as shown below:

    - Event 1: Saturday, 8th October 2022, 12pm - 6pm, Church End Street Festival, Church Road, NW10 2TS

    - Event 2: Wednesday, 12th October 2022, 10am - 4pm, Church End Outdoor Market, Church Rd, NW10 9EP

    - Event 3: Friday, 21st October 2022, 12pm - 6pm, St Mary's Church, Neasden Lane, NW10 2TS

    - Event 4: Monday, 31st October 2022, 10am - 4pm, Brent Mencap, 379-381 High Rd, NW10 2JR

Reach

Information about the CEGA consultation has reached over 16,000 people via the Council's social media. There were 1802 hits to the dedicated CEGA website. 627 people in total, including residents, statutory consultees, and other stakeholders attended the four consultation events. 192 people have engaged in dedicated one-to-one discussions with officers about the plans. 97 people completed the surveys available in our events and online via our consultation portal. 19 people/organisations issued formal consultation responses.





Figure 1 - Photos of the face-to-face events.

Overview feedback

In total, 116 people have provided comments on the draft Masterplan SPD during the 7-week consultation period. The majority were supportive. Below some of the supportive quotes:

> *'The masterplan SPD identifies all deficiencies and has correct priorities. If even half of the plan is delivered in 10-15 years, it will be a major improvement to the area.'*
>
> *'I am broadly supportive of the regeneration plan, which is long overdue. There needs to be parallel investment in crime prevention, public safety, and civic pride.'*
>
> *'So glad this is happening, I hope it doesn't lead to massive gentrification.' 'Very happy green spaces will be created.'*
>
> *'Supportive as long as it is environmentally sustainable',*

However, consultation responses asked for further consideration on the following topics:

- Housing: there should be more affordable housing, and this should be available for local residents in need of more suitable accommodation, and for key workers in health, education and the emergency services.

- Green Spaces vs Building Heights: more green space should be provided in appropriate locations to support the increase in housing.

- Infrastructure and Parking: questions were raised in relation to health and educational infrastructure to support the increase in housing. Comments also related to parking pressures, provision for Electric Vehicle (EV) charging, and parking for elderly and disabled people as well as for the religious institutions based in the locality.

- Cleaning and Fly-tipping: comments related more to the existing situation in Church End that were not directly relevant to the Masterplan SPD. Respondents ask for more investment in initiatives to tackle these issues order to improve the local sense of pride and by consequence, community cohesion.

- Safety and anti-social behaviour: Additional concerns were raised problems in the area and that the Council should be more active in addressing these issues.

- Cycling: better infrastructure should be provided, with minimum specifications seen as key to promoting safe active travel.

- Young people: more facilities and activities for them should be provided.

- Entertainment: local provision should be included.

- Supermarket: new provision required.

- Heritage: regeneration should value and preserve local heritage, including consideration of whether existing buildings need to be demolished in order to provide new facilities.

- Play: more activities for children and play spaces that are fully accessible and inclusive for the community, should be provided.

- High Street offer: requests for measures to ensure a more diverse local offer that support community needs.

- Workspaces: Spaces for crafts and arts which reflect the diverse cultural ethnicity of the area are also welcomed to support community cohesion.

Formal Representations

The table below demonstrates the percentage of people that supported the proposed plans when attending the events or filling the feedback forms and the more limited that disagreed:

	Supportive of the Vision Values and Objectives	Agree with Challenges	Agree with Opportunities	Have no concerns regarding Site Allocations
Agree	70%	61%	54%	43%
Disagree	8%	11%	4%	7%

*The remaining percentages didn't agree or disagree with the plans but provided comments which have helped to inform our response and updates within the document.

A summary of the representations received throughout the 7 weeks consultation period is outlined within the following pages:

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
E01-1	London Square Developments Limited (LSQ)	**6.0 Site Allocations** **6.4 BSSA4: Chapman's and Sapcote Estate** **Number of Residential Units**	The site allocation indicative housing target outlined in the Masterplan SPD is 300 homes. LSQ has engaged in a series of pre-application meetings with LBB and the Greater London Authority (GLA) since February 2022 in relation to the proposed redevelopment of the Site, which forms part of the wider site allocation BSSA4. As part of this process, the pre-application proposals have been presented to the QRP in April 2022 and a subsequent Chair's review in June 2022. LSQ states that the pre-application and QRP meetings have been positive regarding the design and the proposed number of units (circa 300 units) for their portion of the site only. The pre-application scheme has been developed with the support from Daylight and Sunlight, Transport, Sustainability, Ecology, Microclimate, Air quality and Noise consultants to ensure it is technically sound.	The site allocation capacity reflects the developable land at this site. All sites have been assessed to understand their development potential and capacity. The remainder of this site is under very fragmented land ownership and feedback from businesses indicate that they are performing well, and therefore have not been considered for redevelopment. The capacity indicated in the Site Allocation is an 'indicative target'. As it is *'indicative',* providing an application which delivers a greater number of dwellings is robustly justified, and compliant with the wider development plan and the aspirations of this SPD, then it could be considered acceptable at application stage. The predicted capacity is considered to reflect the Council's masterplan evidence base, and on-going conversations through pre-applications. Further text will be included to provide clarification on the point raised.	*Text added* Section 4.2 The Masterplan: 4.*2.3 The capacity indicated in the Site Allocation is an 'indicative target'. As it is 'indicative', providing an application which delivers a greater number of dwellings is robustly justified, and compliant with the wider development plan and the aspirations of this SPD, then it could be considered acceptable at application stage.*
E01-2	London Square Developments Limited (LSQ)	**6.0 Site Allocations** **6.4 BSSA4: Chapman's and Sapcote Estate** **Phasing**	Section 7.4 of the draft SPD sets out the indicative phasing for development across three phases: Phase 1 (3 -5 years); Phase 2 (6 – 11 years); and Phase 3 (6 – 11 years). The draft SPD states that within Phase 1 industrial land within the site allocation BSSA4 has been subject to detailed design and planning work and has the potential to come forward within 3 – 5 years. SPD Figure 84 sets out a diagram of Phase 1 which is included in Figure 1. The Figure shows the 370 High Road and 54 – 68 Dudden Hill Lane site as providing 245 new homes as part of Phase 1. LSQ has engaged in detailed pre-application discussions with LBB in relation to the proposed development at 370 High Road and 54 – 68 Dudden Hill Lane. This development incorporates approximately 300 residential units. Phase 1 should therefore be amended	The Masterplan SPD is a planning guidance document and cannot overrule already adopted policies and estimated housing targets as it is set out in Brent's Adopted Local Plan. The capacity indicated in the Site Allocation is an 'indicative target'. As it is *'indicative',* providing an application which delivers a greater number of dwellings is robustly justified, and compliant with the wider development plan and the aspirations of this SPD, then it could be considered acceptable at application stage.	No change.

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			to this, to reflect the positive pre-application discussions.		
E01-3	London Square Developments Limited (LSQ)	**6.0 Site Allocations** **6.4 BSSA4: Chapman's and Sapcote Estate** **Land Use**	SPD Figure 13 outlines the proposed ground floor land uses across the SPD area. In relation to the Site, this includes light industrial (Class E(g)(iii)) and retail, F&B and services (Class E(a)/(b)/(c) and sui generis). This follows the previous application for the redevelopment of the Site (ref. 18/3498), which was withdrawn in January 2021 and included ground floor retail use. The pre-application scheme similarly includes retail floorspace at ground floor level which is required to facilitate the wider development. However, SPD Figure 70, which sets out indicative massing for the Site, only includes residential (Use Class C3) and commercial offices, workspace and professional services (Use Class E (c)/(g)). On the basis that retail floorspace is required to facilitate the redevelopment of the Site, and for consistency with SPD Figure 13, it is suggested that Figure 70 should be amended to include retail use at ground floor and the wording of that the Strategic Objective of Section 6.4 should be amended.	The team acknowledges the differences pointed out on Figures 12 and 79 (updated numbers).	Figure 79 to be updated to include retail use at ground floor, as indicated on Figure 12. Text added on Section 6.4, Strategic Objective to match details indicated on figure 12: Residential development and workspace will be directed towards Colin Road and the High Road. *Retail floorspace will be directed towards Dudden Hill Lane.* The industrial function of Sapcote Trading Centre and Chapman's Park Industrial estate will be protected and intensified.

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E01-4	London Square Developments Limited (LSQ)	**6.0 Site Allocations** **6.4 BSSA4: Chapman's and Sapcote Estate** **Building Heights**	The indicative building heights of 1 – 10 storeys are based on the Withdrawn Application which is no longer coming forward. LSQ has developed an alternative design in consultation with LBB that incorporates a height, scale, massing and built footprint that varies from the withdrawn scheme. The design led process has resulted in the proposed heights of buildings varying between 3 storeys (ground with two upper storeys) and 14 storeys (ground with 13 upper storeys). Given that the pre-application scheme has been developed through a detailed design led process and has been tested to demonstrate that it responds positively to the surrounding context, it is suggested that the indicative heights set out throughout the SPD should be updated to reflect the pre-application scheme.	London Plan policy D9 requires boroughs to define what a tall building is, identifying appropriate locations for them, and designating them in their local plans. Tall buildings outside of these areas will not be allowed. Accordingly, Policy BD2 of the Brent Local Plan identifies tall buildings as being those which are more than 30 metres in height. The Local Plan policies map identifies Tall Building Zones where tall buildings will be considered appropriate. The site BSSA4 sits outside of a Tall Building Zone. This is because the area is not considered to have the characteristics that would warrant its identification as a Tall Buildings Zone as per Brent's Tall Building Strategy.. The SPD, as a guidance document only, cannot create new policy.	No change.
E01-5	London Square Developments Limited (LSQ)	**General** **Withdraw application**	It is suggested that that reference to the Withdrawn Application, which will not come forward, should be removed.	The only direct reference to the withdrawn application is on page 61, Existing Framework. The proposal is used to indicate and illustrate potential redevelopment of the site. On Section 6.4 the name Willesden Workshop is used on page 82, Community Spaces and on page 102 purely to indicate the portion of the site discussed. However, it is recognized that the name 'Willesden Workshop' no longer relates to the site, so references to it will be removed.	Text on Section 6.4, Policy Requirements, Community Spaces, to be updated: New workspace to be delivered within *new development on the site should aim to provide a business support function* ~~Willesden Workshop site is to provide a business support function~~ and deliver community benefits. Appendix B BSSA4 to be updated: ~~Willesden Workshop~~ *Dudden Hill Site*
E01-6	London Square Developments Limited (LSQ)	**6.0 Site Allocations** **6.4 BSSA4: Chapman's and Sapcote Estate** **Erick Road**	It is suggested to correct the reference to Erick Road as it has no co-relation with the site and replace it to Colin Road which runs adjacent to the site.	The team acknowledges the discrepancy noted.	Text removed and updated Section 6.4 Building Heights: Buildings heights to vary between 1-10 storeys. Development will need to address the close proximity to the

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					residential homes at ~~Erick Road~~ *Colin Road*, minimising impact of massing.
E02-1	Collins Coward Planning and Development Consultancy on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA	**General**	Residual unit at no 28 has never been a feature of the discussions to which the consultee shall refer and this component of the building is shown outside of the red line on the enclosed. It is submitted that there is little prospect of this position changing. The two owners have been jointly pursuing a development scheme(s) for many years with various previous applications for prior approval and redevelopment before the local planning authority. A summary of the planning history has been included as part of the representation. This history is important as it shows a clear commitment to develop the site and confirm that this will be one of the first sites to come forward as a pump primer to begin to deliver the aspirations of the masterplan. It is also stated that a redevelopment of the scheme has been agreed within the context of pre application discussions, in respect of height and design. Developers welcome the Church End revival and are clearly engaging in the process.	We welcome the commitment and the efforts that have been made to redevelop the site. We re-enforce that pre-application discussions provide feedback and guidance on the scheme and do not configure a formal approval.	No change.
E02-2	Collins Coward Planning and Development Consultancy on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA	**5.0 Urban Design Framework** **5.4 Building Design and Architecture** **Housing Typology / Existing Framework**	At 5.4 the site is notated as being a block of flats over 3 storeys, but this is not the case: the use is still offices.	The team acknowledges the need for updating Figure 53.	Change the current hatch from Figure 53, removing residential reference and showing 29-31 Cygnus Business Park as office use.
E02-3	Collins Coward Planning and Development Consultancy	**7.0 Delivery Approach and Phasing** **7.4 Indicative Phasing**	The site is likely to be the first to come forward with a scheme and if there is a viable scheme this will be taken through planning in 2023 and developed thereafter.	Figure 92 (revised number) acknowledges that the site discussed is likely to be the first one on BSSA1 to be delivered, with the site being part of Phase 1 with delivery expected to take place between 3-5yrs.	No change.

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	on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA				
E02-4	Collins Coward Planning and Development Consultancy on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA	**Building Heights**	The current pre application scheme is 9 storeys at its highest and this is not consistent with the 7-storey indication in the MP albeit we do accept that this is only a broad-based indication.	Building heights outlined are guidance to ensure the scheme integrates well with the surrounding urban framework. Providing an application which delivers a greater number of dwellings is robustly justified, and compliant with the wider development plan and the aspirations of this SPD, then it could be considered acceptable at application stage.	No change.
E02-5	Collins Coward Planning and Development Consultancy on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA	**Deliverability**	Conflicting planning requirements are suggesting that the site cannot come forward: with the height limitation; the need to retain the industrial floor space, to include affordable workspace; provide 25% family accommodation as well as affordable housing. The MP should reflect the realities of the economic situation and by this we are not simply referring to the more immediate concerns which we are dominating 2022 and which we hope are short lived. The viability and practicality points have a long pedigree and if the site is to be developed with a decent architecturally designed scheme and so contribute to the regeneration objective these viability points need to be taken in mind. It is also hoped and anticipated that the regeneration team will assist in facilitating this through the planning proves within this viable and practical context. A list of unrealistic/competing requirements is not going to yield a scheme and a practical view should be taken and this should be a key comment of the MP as it is only by such	Noted. There are always potential tensions balancing planning policy requirements. Individual schemes will be evaluated on their own merit and how they bring about and achieve the comprehensive redevelopment of the area when they come forward for planning. The extent to which proposals meet policy requirements will be weighed as part of the planning balance. Policy provides sufficient flexibility in instances where it is not possible to meet all policy requirements simultaneously for viability reasons, providing it is robustly demonstrated such would render redevelopment of an otherwise acceptable scheme undeliverable.	No change.

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			an approach that the regeneration imperatives will be delivered.		
E03-1	National Highways Limited	**General**	National Highways encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. It welcomes working with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development.	We welcome the support to develop and collaborate to deliver the masterplan objectives.	No change.
E03-2	National Highways Limited	**5.0 Urban Design Framework** **5.2 Movement and Connectivity** **TM1 Transport Impacts**	Any proposed development capable of presenting an impact on the network should be accompanied by a robust transport assessment or similar. National Highways will consider the impact of a development proposal on the network at the time of application submission but also welcome early involvement in discussions as development proposals emerge. National Highways highlights Paragraphs 9 and 10 of the Circular which refers to development proposals being unacceptable, by virtue of a severe impact, if they increase demand for use of a section of the network that is already operating over-capacity or cannot be safely accommodated within the existing infrastructure provision, unless suitable mitigation is agreed. In such a circumstance, mitigation would be requested. Should any impact on the SRN be identified, National Highways will seek to use Grampian conditions to limit development prior to SRN improvement schemes being in place or any mitigation measures identified phased in relation to the CEGA sites coming forward. National Highways also highlights London Plan Policy T4 that requires London boroughs to assess impacts on all transport modes including the wider strategic highway network.	We recognise the importance of engaging with National Highways at early development stages. We are also aware of London Plan Policy T4 that requires London boroughs to assess impacts on all transport modes including the wider strategic highway network. This policy also requires application which generate significant movement, in accordance with the NPPF, to submit a Transport Assessment. These are to be produced in accordance with TfL guidance, and focus on their Healthy Streets Approach. This is with an aim of reducing reliance of vehicles, and increasing the uptake of sustainable transport modes. This is reflected in the masterplan development principle TM1 which requires Travel Plans and Transport Assessments to be submitted, and TM2 which requires development to be car free/lite. A similar approach has been taken for the Neasden Stations Growth Area SPD which has had a transport assessment undertaken to assess the impact on the strategic road network (including M1). This took into account other development including in CEGA. It identified no significant impacts. Given the lower level of development proposed in CEGA it is therefore unlikely that development will have a significant impact upon the strategic transport network.	No change.

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E03-3	National Highways Limited	**5.0 Urban Design Framework** **5.2 Movement and Connectivity** **TM2 Car ownership and parking**	Under Section 5.2 of the Masterplan SPD, TM2 highlights car ownership and parking, citing 'Reduce travel by private car through car-free or car-lite development supported by provision for shared mobility including car clubs. Provision must be made for charging electric or Ultra- Low Emission vehicles. (Local Plan policy BT2)'. Any proposed development should prioritise active, efficient, and sustainable transport choices. The CEGA benefits from close proximity to Neasden Station and Dollis Hill Station which are served by the Jubilee line with regular services to the southeast into central London, and to the northwest to Wembley Park. National Highways welcomes measures to reduce private car traffic generation in the first instance and the provision of sustainable transport measures. Whilst we support a sustainable transport strategy, we need to understand whether it is likely these measures will discourage vehicle trips travelling on our network, which are largely strategic journeys in nature. For National Highways, it is measures such as public transport enhancements i.e. bus, underground, rail or improved integration of these services that would realistically affect the number of vehicle trips that would otherwise travel on our network. We do recognise that there will still be a desire for commercial and private vehicle trips using the national strategic highways.	The masterplan outlines a number of traffic and infrastructure improvements to help incentivise people to opt for active travel options. Please see Section 5.2 Proposed Interventions. It focuses on key routes to access public transport stations Neasden and Dollis Hill, as well as junctions that can be dangerous for pedestrians and cyclists. By doing this, we hope to improve public transport take up across the area and create a more welcoming environment for people to move across. All improvements have been added to Brent's Infrastructure Delivery Plan (IDP) and we hope to secure funding from developments coming forward to deliver the improvements highlighted. We ensure that any forthcoming development that may have the potential to impact upon National Highways' network is accompanied by a robust transport assessment or similar, to identify what traffic impacts the development site(s) would have on the network, and mitigation measures put forward to accommodate this. The Council is actively exploring installation of EV charge points across the area. In addition, Brent's EV Infrastructure Plan details expected EVCP demand in the coming years. Ways to meet this demand are being explored.	No change.
E03-4	National Highways Limited	**Summary**	National Highways has undertaken a review of the draft Church End Growth Area (CEGA) Masterplan Supplementary Planning Document, dated September 2022, which helps identify and maximise the development potential of the CEGA. The Masterplan SPD proposes a high level of development, and it should be ensured that any forthcoming development that may have the potential to impact upon our network is accompanied by a robust	We welcome the support.	No change.

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			transport assessment or similar, to identify what traffic impacts the development site(s) would have on our network, and mitigation measures put forward to accommodate this. We look forward to continuing to participate in future consultations and discussions.		
E04-1	Sport England	**5.0 Urban Design Framework** **5.3 Green and Open Spaces** **Sport Facility Impact**	The SPD seeks to provide 1,300 homes the occupiers of which will generate demand for sporting provision. The existing sport provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that the SPD should set out what facilities are required to meet existing sport facility deficits and future demand. Sport England is unclear how the demand for sport provision was established and whether it is based on a robust and sound evidence base. The Council's Playing Pitch Strategy is out of date and Sport England is unaware if the Council has similar strategy for indoor/built sport facilities. As a result, whilst Sport England welcomes that the SPD acknowledges sports facilities would need protecting and new provision might be required, it is concerned that the type, amount or extent of facilities has not been robustly informed by a sound evidence base. This raises questions whether the SPD positively plans for sport and its soundness.	The masterplan SPD was developed based on Brent's Open Space, Sports and Recreation Study (2019), Brent's Indoor Sports and Leisure Facilities Needs Assessment (2018), and the Playing Pitch Needs Assessment (2016). The documents provide a comprehensive appraisal of the existing provision in the Borough as well as its condition, distribution and overall quality. It also considers the demand for provision based on population distribution, planned growth and consultation findings. Whilst the Council acknowledges that these documents were prepared some years ago, the Council does not agree that it is realistic to reproduce extensive and expensive evidence to identify the local need. The documents have been designed to be robust, and resilient to change, taking into account the Councils planned population growth up until 2041, and how this can be met by existing and new social infrastructure provision. We also recommend individual schemes to engage early with the community to understand specific local needs and address them within their detailed design proposal when they come forward for planning.	No change.
E04-2	Sport England	**5.0 Urban Design Framework** **5.3 Green and Open Spaces**	Sport England welcomes that OSF1 requires that fitness and wellbeing needs should be met with paragraph	We welcome Sports England support.	No change.

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		Development Principles	5.3.11 indicating some sites expected to retain or bring forward sports facilities.		
E04-3	Sport England	**5.0 Urban Design Framework** **5.3 Green and Open Spaces** **Development Principles**	Sport England support that the SPD, in OSF2, recognises that development should contribute towards the maintenance, improvement and expansion of facilities. Maintenance implications, in particular, are often overlooked so by ensuring that this is considered at the outset is important for the sustainability of a facility.	We welcome Sports England support.	No change.
E04-4	Sport England	**5.0 Urban Design Framework** **5.3 Green and Open Spaces** **Active Design**	Sport England also welcomes that OSF4 highlights that any facility should be developed to align with Sport England guidance and owners/operators should entering into Community Use Agreements as this would ensure that facilities would be publicly accessible and fit for purpose.	We welcome Sports England support.	No change.
E04-5	Sport England	**5.0 Urban Design Framework** **5.3 Green and Open Spaces** **Active Design**	Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England, along with Public Health England, have launched Active Design which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy with many elements of the SPD, particularly when considering the health and wellbeing aspirations mentioned within the SPD's vision. There are also references within the SPD to co-location, creating a network of green infrastructure, adopting the 'Healthy Streets' approach and encouraging active travel modes which align with Active Design Principles. Sport England recommend the draft SPD to include clear references to Active Design, its principles and the Active Design Checklist.	The masterplan SPD embraces some of the Active Design principles within its underpinning values and development principles but does not make particular reference to the Active Design checklist. Recommendations will be amended to refer to the Active Design checklist.	Text added: *OSF5 Design: Developments must plan for active design. Please refer to the Sport England Active Design checklist.*

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E04-6	Sport England	**5.0 Urban Design Framework** **5.3 Green and Open Spaces** **Employment**	Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England which placed sport within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting (**Economic value of sport in England* June 2013 published by Sport England). Sport and sport-related activity was estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England. It is Sport England's contention that the Council should consider sports uses, such as fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites within the Growth Area as they do create sustainable employment opportunities and provide work experience and qualifications. Sport England therefore recommends that employment site destinations and the policies that affect them include sport and recreation facilities which could complement the more traditional 'employment uses' or create more employment opportunities.	The employment sites referred to include those designated as Locally Significant Industrial Sites (LSIS), and non-designated Local Employment Sites (LES's). LSIS is protected under Local Plan Policy BE2, in accordance with London Plan policies E4-E7, for industrial intensification. This includes the uses listed under criterion A of E4 as being appropriate. This does not include sports and leisure uses. BE2 requires that industrial land is intensified to a minimum plot ratio of 0.65 or existing, whichever is greater. Providing this is achieved, the delivery of non-industrial uses, where they contribute toward a mixed and balanced community, may be considered acceptable providing it is evidenced. LES's are protected under Local Plan policy BE3, in accordance with London Plan policy E4 for employment uses. Although this is more flexible than LSIS, it does not include sports and leisure facilities. On these sites, it would not be possible for the SPD to advocate for their redevelopment to include sports and leisure facilities where this is not evidenced. Some of the sites include existing retail. These sites do not include the restriction of the LSIS and LES sites. Therefore, the provision of sports and leisure facilities could be considered acceptable. Currently, there is no specific reference in the draft Masterplan SPD to employment opportunities linked to fitness and health. Given the above restrictions, it is considered that the potential for these uses within the masterplan area could be made clear.	Text added: *5.3.14 The Council is supportive of sport and recreation facilities to complement employment uses. Sports and leisure uses will therefore be considered acceptable on existing retail sites where their need is evidenced, in addition to designated and non-designated employment land where they contribute toward mixed communities, and development intensifies industrial/employment floorspace in accordance with Local Plan policies.*

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
E05-1	Resident 1	**Capacity of the infrastructure**	Concerns that by increasing housing capacity we will be putting strain on the existing public services in the area such as primary schools, rubbish collection/fly tipping, GP surgery, NHS dental surgeries. There doesn't seem to be any clear plan for increasing capacity of these services. This area has a huge and constant problem with fly tipping. I can only see this getting worse as the population increases.	The masterplan SPD establishes a longer-term approach for cohesive and comprehensive redevelopment of sites. It was developed taking into consideration the existing and future population growth as well as its needs and demands. All statutory services and provision related to education, waste collection and health have been considered including the below: Schools: Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates that Brent will continue to have a high number of spare places across the primary system at a borough level. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction in Neasden Lane. Further details on Brent's School Place Planning Strategy. Waste collection: Development principle W3 Storage indicates that new developments need to adhere to a Site Waste Management Plan and Operation Waste Management Plan. (London Plan policy D6 and SI7). This ensures that on-site waste is effectively managed. Development Plan policies also require that both construction and household waste is reduced. The West London Waste Plan seeks to ensure the future capacity of waste sites is sufficient to meet future demand given population growth and changing trends. This is an effort to ensure that London is self-sufficient and can meet all of its waste needs in accordance with London Plan policy SI8. Health provision: The North West London Integrated Care System (ICS) was consulted as officers developed the draft CEGA Masterplan SPD. The ICS stated by May 2021 that there is no need for an additional health hub/facility within the CEGA boundary. The CEGA Masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold	Update references to Clinical Commissioning Group to *Integrated Care System,* on Sections 6.2 BSSA2 Policy Requirements and Appendix B- BSSA2.

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				Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m2) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years.	
E05-2	Resident 1	**Parking**	People parking in residential bays without permits and illegal parking are a recurrent issue. Not enough parking wardens at relevant times. Recent new developments have exacerbated parking issues when bays are used as storage for building materials.	The masterplan SPD promotes car-free or car-lite development. Proposals will need to adhere to policy guidance set out in section 5.2- TM2 Car ownership and parking**.** Developments will need to comply with Brent Local Plan parking standards, as set out in Policy BT2, which seeks to limit the provision of parking as far as is practicable. The SPD also, in accordance with Development Plan policy, seeks to increase the modal share of more sustainable transport modes, including walking, cycling, and public transport. Church End Growth Area is near two (2) underground stations Dollis Hill and Neasden. To stimulate the use of public transport, the masterplan indicates a number of streets, junctions and crossings where improvements need to be made. Safer, well-lit, welcoming and connected routes can support this transition. Improvements in junctions can also help optimise traffic flow and by consequence bus service provision. This will mean fewer people feel the need to own a vehicle, which will result in fewer breaches of parking allowances. To ensure only those with dedicated parking spaces and permits own vehicles, the Council will consult on introducing a Controlled Parking Zone (CPZ) within the surrounding area. Developers will be expected to provide a car parking management plan which demonstrates how they will enforce the use of parking spaces within the area.	No change.

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				It is considered that the masterplan SPD will not result in worsening parking problems within the area.	
E05-3	Resident 1	**Crime**	Concerns that by increasing the population, common rising issues will increase such as street drinking, drugs, and crime.	Development principles were developed to ensure new spaces are safe, well-lit, overlooked and active. By doing this we plan to create environments that people want to occupy and use, creating a strong and positive sense of community identity. Whilst the SPD seeks to improve the area in terms of safety, crime prevention, fly-tipping and public realm improvements, by setting out principles that will help to better the area, it alone cannot resolve cleanliness and social behavioural issues. London Plan policy D11, in addition to other design-related policies, seeks to design out crime. This includes reference to the Secured by Design scheme published by the police. This includes design measures which reduce the likelihood of crime, such as ensuring passive surveillance and street lighting which help guard against anti-social behaviour. To bring extra consideration to the topics mentioned, further text can be added.	Text added: OGS3 Safety: Create safe spaces and secure access by designing out crime, and by providing well-lit and overlooked spaces, adjacent uses that provide activation. *Development proposals should pay due regard to Secured by Design (SbD) standards.* (Local Plan policy BGI1)
E05-4	Resident 1	**HMOs**	Planning permission: of the 3 or 4 houses on Ilex Rd that have recently been bought and sold, all seem to have been split into HMO's. Again, this leads to increased pressure on parking and rubbish collection.	This comment relates to an existing address and is not relevant to the SPD. Any suspected breaches of planning control can be reported to the enforcement team for investigation.	No change.

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E06-1	Resident 2	**Youth places and support**	Over the past 30 years there has been very little consideration given to the impact of removing youth provision and youth space in the community. This has had many negative consequences that are evidenced in Chalkhill, Stonebridge and Church End. Church End needs a Youth Centre similar in size to the UNITAS Building in Barnet. In order to improve the life-chances of the current and future youth of NW10, this needs to be the first clear commitment in the development of the masterplan. If young people have a place where they feel safe that is accessible, they will use it. However, such a place first needs to be built and the community needs to know that this is recognized as a priority need by the Master planners.	The masterplan SPD recognises the need to invest in spaces and support for young people. BSSA1 is allocated to deliver a community space linked to the existing arts and film production supporting training and employment for young people. BSSA3 encourages the use of vacant and underused high street units to provide new community space and affordable workspace, with an emphasis on space for young people, art and local enterprise. The engagement developed throughout the masterplan SPD has also helped the Council to secure support and funding to deliver Church End Youth Anchor in a vacant town centre premises, an innovative initiative to support young people that is due to open by the end of 2023.	No change.
E07-1	Transport for London (TfL)	**Co-Location**	In line with Policy E7, it should be ensured that the proposed development is designed to include appropriate mitigation for the residential element, including but not limited to, ensuring that access, servicing and delivery arrangements of the proposed use seek to minimise conflict. In line with Policy D13 of the London Plan, it must be ensured that proposed new noise-sensitive developments mitigate impacts from existing noise and other nuisance-generating activities to ensure that existing uses can remain viable and continue or grow without unreasonable restrictions being placed on them. As part of the design principles included on Page 54 of the consultation SPD, it has been identified that there will be separate access for different uses and users, consolidating servicing areas and providing dedicated access to allow separate pedestrian and cycle access from the street. For industrial intensification it is noted	Noted. SPD principle TM3 requires development to be informed by delivery and servicing plans, specifically ensuring that the potential conflict between residential and industrial uses is minimised. Section 5.5, Development Principles of the SPD addresses the Agent of Change principle in accordance with London Plan policy D13. This will allow potential bad neighbours to continue effective operation alongside sensitive residential receptors and includes explicit consideration of noise and odour. Additional text will be included to ensure the site can accommodate co-location in a safe manner. Support welcomed.	Text added: TM3 Logistics: Development should be informed by Delivery and Servicing Plans. These should balance providing adequate access and servicing arrangements for industrial/commercial uses and residents whilst protecting amenity. Technical innovation to consolidate delivery and construction transport is encouraged, including provision for electric vehicles. *Consideration should be given to imposing safety standards for delivery and servicing vehicles at the site: minimum of FORS Silver, preferred of FORS Gold for all HGVs).* (Local Plan policy BT3)

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			that within the design principles it has been identified that the service yards should incorporate sufficient space for HGVs to turn (where appropriate). This is in line with Policy T7, which states that developments should ensure that they provide adequate space for servicing, storage and deliveries off-street. It should be ensured that vehicles are able to enter and exit the site in a forward gear. Noting that the majority of the additional homes are to be delivered through co-location, in which there will be a mixture of industrial and residential development on the different sites, consideration should be given to imposing certain safety standards for delivery and servicing vehicles at the site (i.e. minimum of FORS Silver, preferred of FORS Gold for all HGVs).		
E07-2	Transport for London (TfL)	**West London Orbital Line**	It is noted that the document includes references to the West London Orbital Line (WLO), which is a new public transport scheme to connect the growth areas in west London, as outlined in Proposal 88 of the Mayor's Transport Strategy (MTS). The document needs to be clear that this proposal still needs funding and further development and design, amendments are required to the text and figures to provide better clarity on the WLO. References to 'Proposed Dudding Hill Station' should be amended to 'Proposed WLO station' or 'Proposed Neasden WLO station' to ensure that there is consistency with TfL terminology used for this project and to avoid confusion with the historic Dudding Hill station which was at a different location. It is also considered that Figure 5 of the document can be made clearer, and current inaccuracies addressed. Matters to be addressed as part of an updated Figure 5 can be summarised as:	Clarification can be provided to reinforce WLO is still dependant on funding and further development design. Name of the station also to be updated to ensure consistency with TfL terminology. Figure 5 will also be updated for clarity and precision. The location of the WLO in figure 33 will also be corrected.	Text added: 2.3.1 Both Neasden and Church End Growth Areas could benefit from the West London Orbital (WLO) route proposed in the Mayor's Transport Strategy 2018. The WLO would reactivate the Dudding Hill freight line to the north-west of CEGA for passenger travel. A new Overground station at Neasden Lane would provide interchange with the Jubilee line. It would also connect to Brent Cross and Old Oak Common and increase the area's capacity to support regeneration and growth. ~~Funding and permission for the WLO is to be confirmed.~~ *Delivery of the proposed passenger line and stations is still dependant on funding and permissions.* Name of the station to be updated to: 'Proposed WLO station' in all maps of the masterplan SPD.

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			• Lionel Road Station is identified on the map as existing, rather than potential • The map has two different colours for 'potential' and 'proposed' in relation to the WLO, which is confusing. • 'Existing West London Overground line and station' includes some parts of the LO network but misses others off (e.g. the route south of Willesden Junction to Richmond via South Acton is not shown). Clearly identifying all London Overground infrastructure would help show there would be more good connections from Church End with WLO. • The location for the HS2 station is marked a considerable distance west of its actual location. Also, in Figure 33 the proposed WLO station is located in the wrong place: it should be shown immediately west of where the railway crosses Neasden Lane.		Figure 5 to be replaced for the one used on NSGA Masterplan SPD (adopted) sourced from the Mayr's Transport Strategy 2018. Figure 33 to have WLO location corrected.
E07-3	Transport for London (TfL)	**Neasden Station**	It is noted that in Figure 30 the document makes references to a public realm intervention at Neasden Station. Clarity should be provided on the expectations for the public realm intervention, and whether this is a separate scheme or considered to be part of the station project.	It is agreed further detail can be included to clarify the expectations for the improvements and relation of this to the public realm improvements around the existing station project.	Section 5.2 Movement and Connectivity, Proposed Intervention, Text added: 1.7 Neasden Station Public Realm *(project part of NSGA, design and funding subject to confirmation and approval from TfL)*
E07-4	Transport for London (TfL)	**Bus Stands**	In line with Policy T3 this stand, as well as other bus stands and stops located within the Church End masterplan area, should be protected. Any relocation of stands and stops must be discussed with TfL in advance of any application being submitted, to ensure that any alternative location offered is suitable and adheres to TfL's standards.	It is agreed that further clarification should be provided regarding bus stops.	Text added on Section 5.2 Movement and Connectivity, Development Principles: ~~Active~~ Sustainable Travel *ST5 Bus stops: Any relocation of stands and stops must be discussed with TfL in advance of any application being submitted, to ensure that any alternative*

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			We support the commitment to provide continued bus access along Church Road which is mentioned in option 1. We seek an assurance that continued bus access would also be provided under option 2. In either option we would want to have early engagement to discuss any proposed relocation of bus stops. They should be located and designed to optimise access for passengers and ensure safety for passengers and other users of the street space in line with TfL guidance.		*location offered is suitable and adheres to TfL's standards.* Text added 5.2 Proposed interventions Option 2 – *Building upon option 1,* recreate the historic alignment of Church Road: The two green spaces would be joined to form a public square whilst businesses at the western end of the high street would retain access to servicing and loading facilities. *In this option, London buses would continue to circulate throughout. The section between Ilex Road and Roundwood would continue to have restricted traffic for private vehicles, but movement throughout the two roads would remain as it is.*
E07-5	Transport for London (TfL)	**5.0 Urban Design Framework** **5.2 Movement and Connectivity – Proposed Framework**	The movement hierarchy is a useful tool, but some caution needs to be applied to the widths, which are provided as minima. The guidance in all cases should be in line with national and London-wide guidance, but at present there is some risk of contradiction with other guidance. It is considered that this information would be better presented as graphic street sections rather than in text only as currently presented in the draft SPD.	Figure 21 provided a high-level summary of road typologies in the masterplan area. Their applicability for the proposed interventions on the Proposed Framework section would be considered in detail at application stage. Any significant interventions which impact upon TfL operations will be subject to consultation with TfL. In all cases this will take into consideration national and regional best practice guidance.	Key priorities will be indicated for each typology as per below.
E07-6	Transport for London (TfL)	**5.0 Urban Design Framework** **5.2 Movement and Connectivity – Proposed Framework**	It is also noted that each type has a long list of components that 'should' be provided. It would be helpful to have some prioritisation of these i.e. could these requirements more usefully be divided into 'must' 'should' and 'may'?	Using 'should' allows for greater flexibility given the varying capacity of different areas to accommodate each required intervention. The appropriateness of each intervention will be considered in detail at application stage, where the absence of interventions will be noted and need to be justified.	No change.

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E07-7	Transport for London (TfL)	**5.0 Urban Design Framework** **5.2 Movement and Connectivity – Proposed Framework**	It should also be noted that the preferred minimum lane width for roads which supports bus movement is 3.25 metres.	Comment noted. Text will be added to reflect suggestion.	Text added 5.2 Movement and Connectivity / Street Hierarchy as per below.
E07-8	Transport for London (TfL)	**5.0 Urban Design Framework** **5.2 Movement and Connectivity – Proposed Framework**	Dual Carriageway - This would benefit from a stronger steer towards providing SUDS and planting, which is implied through the choice of image, but not supported in the list of minimum widths. Instead of using the term 'buffer', this could explicitly say 'planted strip' or similar. For a footway on a wide street, it is recommended that a minimum of 2 metres clear width is provided, making it clear that this space is not to be used to accommodate all signage and street furniture. It is recommended that 'cycle paths' is referred to as 'cycle tracks'. In line with LCDS standards, for reasonable cycle flows, these ought to be a minimum of 2.2m if one-way or 3.0m if two-way.	Dual carriageway – The list for this street typology includes rain gardens and SuDS as being required. Agreed that buffer could more explicitly indicate a green buffer, see proposed change.. It is unlikely to be possible in all instances to make this 'clear width', and that pedestrian flows will easily work around any well planned street signage/furniture. It is considered that cycle paths are accepted and well understood terminology and does not require amendment to tracks.	Removed text and proposed changes below: Addition diagrammatic section. *Ideal widths:* Footway min 2m clear width// Cycle Path min *2.2 m if one-way or 3.0m if two-way* // *Carriageway min. 3.5m* per lane // *Vegetated Buffer min 1m* // It should prioritise *as a minimum*: Street lighting facing both footway and carriageway; Formal wayfinding towards stations, nearby parks and key destinations; Green buffer between carriageways between carriageway and footways; Potential for reduction of carriageway lanes, additional trees, cycle parking, seating & play, rain gardens and Sustainable Urban Drainage (SuDs); Cycle lanes on both sides.
E07-9	Transport for London (TfL)	**5.0 Urban Design Framework** **5.2 Movement and Connectivity – Proposed Framework**	Strategic connector – As above, for a footway on a wide street, it is recommended that a minimum of 2 metres clear width is provided, making it clear that this space is not to be used to accommodate all signage and street furniture. It is recommended that 'cycle paths' is referred to as 'cycle tracks'. In line with LCDS standards, for reasonable cycle flows, these out to be a minimum of 2.2m if one-way or 3.0m if two-way. It has been identified that a strategic connector should have a building-to-building width of 12-15m, which appears to be a little low for a strategic route. For example, it	Strategic connector - Paths are noted as requiring a minimum width of 2m. It is unlikely to be possible in all instances to make this 'clear width', and that pedestrian flows will easily work around any well-planned street signage/furniture. It is considered that cycle paths is an accepted and well understood terminology and does not require amendment to tracks.	Removed text and proposed changes below: Addition diagrammatic section. *Ideal widths:* Footway min 2m clear width// *Should provide: Street lighting facing both footway and carriageway; Junctions and crossings designed to*

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			would be challenging to get dedicated cycle infrastructure into a street of 12-13m. It is recommended that the guidance look at more efficient use of carriageway space, which enhanced crossing facilities, rather than widths which are that may not be workable in practice. For example, at Dudden Hill Lane the width taken up by the third lane, refuge islands and hatching could be relocated to provide cycle infrastructure. This guidance, as it currently reads, would not promote this approach.		*facilitate safe, convenient active travel; Formal wayfinding towards stations, nearby parks, key destinations and Town Centres; Safe and overlooked cycle parking; Opportunities for greening vertical surfaces.*
E07-10	Transport for London (TfL)	**5.0 Urban Design Framework** **5.2 Movement and Connectivity – Proposed Framework**	Local Streets – As above, it is recommended that a minimum of 2 metres clear width is provided, making it clear that this space is not used to accommodate all signage and street furniture. A clear distinction needs to be made between one-way and two-way streets, particularly because the image shown is of a one-way street. 3m would be acceptable for a one-way street but unworkable for two-way. Most if not all of the streets shown as local streets in figure 20 are two-way. It may be more helpful to give a steer on what to do with parking in these streets, i.e. kept to one side, in short stretches of allocated bays, on-footway / at footway level where the footway is at least 5m wide. Reference to ease of crossing for pedestrians would also be helpful	Local streets - Paths are noted as requiring a minimum width of 2m. It is unlikely to be possible in all instances to make this 'clear width', and that pedestrian flows will easily work around any well-planned street signage/furniture. The 3m width is referenced as a minimum and would relate to a single lane road. The detail and feasibility of any proposed amendments to the road network would be worked up in detail at application stage. The typologies were used in reference to figure 21 and how each should be treated. As such, for this purpose, it is considered sufficient. The requirement to improve pedestrian crossings is addressed throughout the document, identifying where crossings should be, and how they should be improved to ensure desire lines can be followed.	Removed text and proposed changes below: Addition diagrammatic section. *Ideal widths:* Footway min 2m clear width// *Should provide: Lighting to prioritise footways; Clear sightlines to landmarks and informal wayfinding; Potential for small-scale community interventions and opportunities for growing; Junctions and crossings designed to facilitate safe, convenient active travel (particularly with strategic connector / dual carriageway).*
E07-11	Transport for London (TfL)	**5.0 Urban Design Framework** **5.2 Movement and Connectivity – Proposed Framework**	Industrial/residential – it is unclear what the buffer refers to, and clarity would be beneficial i.e. it is between the cycle track and the carriageway only. Due to the way that they function, it can be argued that Colin Road and Dalmeyer Road do not belong in the same category. Having a residential frontage is a key difference. It does not appear possible to achieve a 7m-wide carriageway on Dalmeyer Road or Chapel Close. Parking is a key factor – to achieve the minimum widths,	Industrial/residential – The buffer is noted as being 'between servicing routes and pedestrian cycle infrastructure' which provides sufficient clarification. Colin Road is not identified as an industrial/residential road, it is assumed you instead mean 'Chapel Close' which is the only other industrial/residential road. The designations are proposed designations as it relates to the proposed future development. As such, the roads will likely be transformed to accommodate the proposed co-location of industrial and residential as appropriate.	Following previous comments, wording will be amended: *Ideal widths: Footway min 2m clear width//* *Should provide: Street lighting facing both footway and carriageway; Clear formal signage for the industrial estates; Clear wayfinding for pedestrians and cycle connections; Green buffer between*

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			much if not all of the parking would need to be removed.		*servicing routes and pedestrian/cycle infrastructure, trees.*
E07-12	Transport for London (TfL)	**5.0 Urban Design Framework** **5.2 Movement and Connectivity – Proposed Framework**	City hub/boulevard - buffer could be wider as a stronger push towards providing greening and street trees, as well as usable threshold space to support ground floor uses. Different cycle track minima should be expressed for one-way (on both sides) and two-way (on one side) scenarios.	City Hub/Boulevard – The buffer is in reference to the required vegetated spacing between the footpath and the cycle paths. This does not include threshold space to support ground floor uses which will be considered in detail at application stage.	Proposed changes below: Addition diagrammatic section. *Ideal widths: Footway min 2m clear width// Cycle Path min 2.2 m if one-way or 3.0m if two-way // Carriageway min. 3.5m per lane // Vegetated Buffer min 1-1.5m //* *Feature street trees as buffer and green landmarks; Street lighting facing both footway and carriageway and potential downlighters for trees; Formal wayfinding towards stations, nearby parks, key destinations and Town Centres; Seating and spill out from adjacent ground floor uses; Safe and overlooked cycle parking.; Junctions and crossings designed to facilitate safe, convenient active travel*
E07-13	Transport for London (TfL)	**5.0 Urban Design Framework** **5.2 Movement and Connectivity – Proposed Framework**	City Place – It is recommended that the intent is backed up by text – 'shared space' and 'lanes are not compatible.	Comment noted. Changes will be made to reflect the suggestion provided.	Text updated: *Ideal widths: Footway min 2m clear width//Min. 8m. Footway min 2m // Pedestrian priority/shared surface* *Should provide: Street trees and low level planting; Formal wayfinding; Lighting to prioritise footways; Benches Seating and spill out from adjacent ground floor uses; Safe and overlooked cycle parking.*
E07-14	Transport for London (TfL)	**AT1 – AT4 Active Travel**	We welcome the prioritisation of active travel, adoption of a Healthy Streets Approach, improved wayfinding and better facilities for cycling including cycle parking. Attention should be paid to addressing the barriers to	We welcome the support. The requirement to improve pedestrian crossings and associated severance is addressed throughout the document, identifying where crossings should be, and how they	No change.

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			movement by active travel including severance caused by heavily parked or trafficked routes and issues of personal safety and security.	should be improved to ensure desire lines can be followed. This is in addition to enhancing the public realm and pedestrian environment more generally.	
E07-15	Transport for London (TfL)	**TM2 – Car Ownership and Parking**	All residential development in areas of PTAL 5 or 6 must be car free to comply with London Plan Policy T6 and car free development should be encouraged elsewhere. Where general car parking is provided it should be minimised consistent with targets for mode share. Encouragement should be provided to the conversion of public, private and on street car parking spaces to other uses. Car clubs are only appropriate where they are substituting for car ownership because car club vehicles contribute to traffic congestion and road danger and take up valuable space i.e. they should only be promoted in locations where car parking is permitted but has been reduced below the maximum.	Development principle TM2, Section 5.2 highlights that <u>developments should be</u> car-free or car-lite development supported by provision for shared mobility including car clubs. Given only a small portion of the growth area achieves a PTAL of 5+, it is considered that this reflects Policy T6 of the London Plan. The majority of the growth area achieves a PTAL of 3+, which the Council would most definitely seek to minimise below the maximums set out in policy T6, in accordance with the aspirations of principle TM2. The Council recognises that car club spaces contribute towards overall parking provision in accordance with paragraph 10.6.15 of the London Plan and should be used as a measure to further reduce parking provision. Reference to green buffers and SUDS to be introduced are made throughout this section which likely will result in some reduction of on street parking provision.	No change.
E07-16	Transport for London (TfL)	**TM3 – Logistics**	Delivery and Servicing Plans should also aim to reduce the impact on the road network and positive encouragement should be given to use of non-motorised freight transport including cargo bikes.	Development principle TM3, Section 5.2 states that developments should be informed by Delivery and Servicing Plans which should provide balanced access and service arrangements whilst protecting residential amenities. More could be added to encourage use of non-motorised freight transport.	<u>Text added:</u> TM3 Logistics: Development should be informed by Delivery and Service Plans. These should balance providing adequate access and servicing arrangements for industrial/commercial uses and residents, whilst protecting amenity. Technical innovation to consolidate delivery and construction transport ~~is~~, <u>*as well as the use of non-motorised freight transport is supported and*</u> encouraged, including the provision for electric vehicles. (Local Plan policy BT3).
E07-17	Transport for London (TfL)	**BSSA4 Chapman's and Sapcote Estate**	Regarding the withdrawn application, concerns were raised regarding the quantum of car parking. It must be ensured that the parking provision is provided in line	The applicant is no longer going ahead with the previously withdrawn application which included a supermarket. The supermarket has since been	<u>Text added:</u> Section 6.4, BSSA4, Design Principles:

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			with London Plan standards for all uses proposed at this site. Furthermore, the bus infrastructure in proximity to the site is protected, with any new development improving the waiting environment of the bus stop located on the High Road.	omitted, which was the use referred to as exceeding the London Plan standards. The Council always seeks to reduce parking as far as is practicable in line with policy T6 of the London Plan. See proposed changes as it relates to the adjacent bus stop.	*'Improve the waiting environment for adjacent bus stops DG and DK in consultation with TfL.'*
E07-18	Transport for London (TfL)	**BSSA5 – Willesden Bus Depot**	The site description should be amended to reflect the fact that the site is in private ownership. Any proposals would need to be consistent with London Plan Policy T3 and London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling. The Agent of Change principle would need to be applied to any redevelopment to ensure that adequate protection for residents or occupiers was provided taking into account the 24/7 nature of bus garage operations.	It is agreed that the SPD should be amended to provide greater clarity on the site's ownership.. Reference to the agent of change reflecting the 24/7 operation is also appropriate. Section 6.5 BSSA5 – Industrial Spaces and Affordable Workspace identifies the need to retain the existing bus garage function, identifying opportunities for increased stabling provision and considering the spatial requirements arising from electrification. Relocation of existing offices can release more space for parking to serve the bus depot.	*Added text:* About the site, Section 6.5 BSSA5: *The Bus garage is privately owned by Metroline and operating TfL services. The garage operates over 100 buses and employs around 300 people including drivers, engineering and admin staff. It is an important site for the bus network and is currently protected from redevelopment that does not maintain its use as an operational bus garage with equivalent or increased capacity.* *Text added:* *Planning considerations:* Air Quality Management Area, Contamination Risk, impact on setting of heritage assets. *Any proposals would need to be consistent with London Plan Policy T3 and London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling. The Agent of Change principle would be applied to any redevelopment to ensure adequate protection for residents or occupiers, taking into account the 24/7 nature of bus garage operations.*
E08-1	Resident 3	**General**	Please share the number of the following facilities anticipated when the growth area completes, per 1,000 people within the Roundwood ward. I'd like two sets of data: the existing number of the following facilities per 1,000 people currently in Roundwood (now), and the number of facilities per 1,000 people in Roundwood	Comment noted. Population: Latest Greater London Authority borough preferred population projections for the Roundwood ward, which take into account births, deaths, net migration, and the local housing	No change.

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			once the Church End growth plan & subsequent development completes, per 1,000 people in Roundwood & factoring in the additional number of people who are anticipated to live in the area due to the development: • Medical facilities • Education facilities • Childcare facilities • Employment opportunities • Supermarkets (not local, corner shops) • Community centres such as youth clubs • Transport links: buses, trains • Open and green public space: m squared • 3 bedroom plus sized homes	development trajectory, estimate a 16,975 person population this year 2022, and a 23,120 person population at the end of the Local Plan and CEGA SPD period year 2041. For reference, the Local Plan and CEGA SPD plan for a minimum 1,300 new homes to 2041, which if delivered would be expected to accommodate approximately 3,250 people. Health provision: The North West London Integrated Care System (ICS) was consulted as officers developed the draft CEGA Masterplan SPD. The ICS stated by May 2021 that there is no need for an additional health hub/facility within the CEGA boundary. The draft CEGA Masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m2) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years. Schools: Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates that Brent will continue to have a high number of spare places across the primary system at a borough level. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction in Neasden Lane. Further details on Brent's School Place Planning Strategy. Employment opportunities: Brent Local Plan policy is to deliver economic growth and employment opportunities for all. Church End contains Locally Significant Industrial Sites (LSIS) and Local Employment Sites (LES) designated to intensify industrial uses through co-location with residential uses. The CEGA Masterplan SPD articulates how redevelopment can deliver these principles, with the	

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				total amount of employment floorspace across the main Local Plan CEGA Site Allocations as follows: - BSSA1 (Asiatic Carpets) (LES/LSIS): 17,673sqm - BSSA2 (B&M Home Store & Cobbold Industrial Estate) (LSIS): 16,727sqm - BSSA3 (Church End Local Centre): 3,995sqm - BSSA4 (Chapman's and Sapcote Estate) (LSIS): 23,343sqm - BSSA5 (Willesden Bus Depot): 6,479sqm - BSSA8 (McGovern's Yard): 1,760sqm Redevelopment will be expected to improve the quality of industrial stock in then area, with the provision of modern light industrial facilities. The draft CEGA Masterplan SPD shows how all Site Allocations can increase the amount of employment floorspace, except BSSA1 (Asiatic Carpets) where the LES part of the Site Allocation designated for mixed use redevelopment since 2010 retains industrial floorspace, but at a lower amount. Supermarket: The SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed. Community Centres: The draft CEGA Masterplan SPD details Site Allocation policy requirements for new development to provide three (3) new community spaces and re-provide one (1) new public house as follows: BSSA1 (Asiatic Carpets) - 1x community space recommended to be linked to the existing arts and film production, for training and employment for young people, approx. 900sqm.	

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				BSSA2 (B&M Home Store & Cobbold Industrial Estate) - 1x health facility - subject to local demand and agreement with the ICS - approx. 1,855m2 - 1x Brent Enterprise Hub: approx. 900sqm BSSA5 (Willesden Bus Depot) - 1x Public House re-provision. approx. 480sqm Transport links: TfL is responsible for London bus routes and services, as well as London Underground stations and services. Officers are not aware off any planned improvements to bus routes and services within the CEGA boundary, however new development is normally expected to provide financial contributions to TfL for buses. Officers are not aware of any planned improvements to Neasden Underground Station or Dollis Hill Underground Station. The Mayor's Transport Strategy identifies Neasden as a location for a new Overground Station on the proposed West London Orbital line, which subject to funding and approvals could see services start late 2020s. The draft CEGA Masterplan SPD has identified improvements for pedestrians and cyclists within the CEGA boundary, including connections to public transport, and new development is expected to contribute to: - 9 roads for streetscape improvements - 11 crossing improvements - 4 cycle infrastructure interventions Green spaces: The CEGA Masterplan SPD details Site Allocation policy requirements for new development to provide six (6) new green spaces, plus, two (2) pocket parks, totalling approximately 9,500m2 of additional green space as follows: - BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm - BSSA1 (Asiatic Carpets): Creative Square: 2000sqm - BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm	

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				- BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm - BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm - BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm - Denzil Road Pocket Park: approx. 500sqm - Conley Road Pocket Park: approx. 500sqm The draft CEGA Masterplan SPD also identifies the need for improvements to existing open spaces. 3 Bedroom sized homes: Brent's Local Plan and draft CEGA Masterplan SPD set the target that a minimum of 25% new homes are family sized dwellings (3 bedroom plus sized homes).	
E09-1	Resident 4	**West London Orbital**	Does the West London Orbital station name "Dudding Hill station" instead of "Neasden" have any significance, please? Did you just decide it yourselves as a 'place-holder', or has the West London Alliance or TfL had any hand in it? Is there any known current TfL policy on having the same name or different names for nearby stations on different lines? (e.g. Shepherds Bush, Hammersmith, Edgware Road, Shadwell, er...)	As per TfL's feedback, naming and clarifications are being added to ensure consistency with TfL's terminology.	Please see E07-2.
E010-1	Natural England	**General**	Natural England have no comments to make on this consultation.	No comments.	No change.
E011-1	Historic England	**General**	The draft SPD strikes a good balance, covers a range of interrelated spatial planning issues and represents heritage considerations well throughout. We welcome the emphasis upon a design-led approach to development which makes the link between heritage conservation and local distinctiveness. We recommend that the SPD draws out the importance of setting of heritage assets more, however, and that to makes reference to non-designated assets.	We welcome the support. The document has a dedicated section highlighting the importance of key historic sites as well as a map of where they are located on Section 5.4, Existing Framework.	No change.
E012-1	Ministry of Defence (MOD)		The MOD have no concerns with the London Borough of Brent Draft Church End Growth Area SPD but would	Comment noted.	No change.

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			wish to be consulted of any potential development within the statutory height safeguarding zone that surround RAF Northolt, which consists of structures or buildings exceeding statutory safeguarding height criteria, or any development within the Birdstrike Safeguarding Zone surrounding RAF Northolt which includes schemes that may result in the creation of attractant environments for large and flocking bird species hazardous to aviation.		
E013-1	Simply Planning on behalf of Kelaty Properties LLP	**Vision, Values & Objectives**	Supportive of the vision, values and objectives of the plan. Asiatic Carpets have medium-long term ambitions to vacate their business from the land and to make the land available for a residential-led mixed-use development, which ties in fully to the allocation for the land within Policy BSSA1 of the Local Plan.	We welcome the support.	No changes.
E013-2	Simply Planning on behalf of Kelaty Properties LLP	**Challenges**	Broadly in agreement with the key challenges, but we consider that two additional ones are required to be added, which is the need for the provision of additional housing and climate change. The Brent Local Plan identifies that the CEGA is required to deliver 1,300 new homes over the plan period to 2041, so delivering this level of housing in an area consisting of predominately brownfield and occupied sites must be one of the key challenges for the masterplan. In addition, in July 2019 the London Borough of Brent declared a climate and ecological emergency, which is Borough wide. Therefore, combating climate change must also be a key challenge of the CEGA SPD.	The two points are considered relevant and the challenges section of the SPD can be amended to reflect them.	Text added: Section 3.2 Challenges *3.2.7: Brownfield and occupied sites: CEGA is a well occupied area, with new growth and development primarily planned to be delivered on low density, but mainly occupied, industrial sites.* *3.2.8: Climate Change: Brent Council is committed to target carbon neutrality by 2030. Church End is one of the most deprived areas of the borough and could be more vulnerable to climate change impacts. Residents in more deprived areas are more likely to live in poorly ventilated homes with less access to green space and lack financial capacity to prepare for floods and heatwaves. Children, elderly people, and people with disabilities or existing health conditions are also more vulnerable from a public health perspective.*

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E013-3	Simply Planning on behalf of Kelaty Properties LLP	**Opportunities**	Supportive of the majority of opportunities outlined in paragraphs 3.3.2 to 3.3.8 for the growth area. Consider that the *'appetite for change'* is most relevant, given their willingness to see the regeneration of their land in the medium to long term. One opportunity we consider as a potential issue is the use of co-location and intensification for the delivery of new housing. Some areas of the plan are over ambitious as to the potential use of co-location and we consider better use could made of Asiatic Carpet's land to deliver the vision and objectives of the masterplan.	Individual schemes will be evaluated on their own merit and how they bring the comprehensive development of the area when they come forward for planning. Future proposals are expected to adhere to the principles and urban design framework set within the masterplan SPD and work in partnership with adjacent landowners to deliver new homes, jobs and infrastructure, and avoid compromising the potential wider development of the area.	No change.
E013-4	Simply Planning on behalf of Kelaty Properties LLP	**BSSA1 Asiatic Carpets**	Key concern is that the masterplan does not align with the designated industrial allocations contained within the Local Plan or London Plan. It was reassuring that the Council has already acknowledged an error in this matter during our discussions and that the masterplan would be revised accordingly ahead of adoption. However, the Town and Country Planning (Local Planning) (England) Regulations 2012 only requires the Council to outline how a consultation response received in relation to the SPD has been addressed, if the issue is raised during the formal public consultation period. Therefore, to ensure the concern is made during the formal public consultation period, and for the sake of completeness, we outline the issue again below. On page 70 of the draft CEGA SPD under the '*Industrial Spaces and Affordable Workspaces'* section, it states as follows: *"LSIS Site: On the Asiatic Carpets site maximise industrial floorspace and affordable workspace. The retention of the film and production function around Neasden Studios is strongly encouraged. On the Cygnus Business Centre site retain existing businesses where possible, ensuring industrial floorspace is intensified and*	Agreed, the SPD needs to be amended to reflect the correct designation with LES indicating redevelopment to achieve the maximum viable employment space.	Text revised: 6.1 BSSA1: Asiatic Carpets – Industrial Spaces and Affordable Workspaces: ~~LSIS~~ *LES Site:* On the Asiatic Carpets site *to achieve the maximum viable replacement of the existing employment floorspace.* ~~maximise industrial floorspace and affordable workspace.~~ The retention of the film and production function around Neasden Studios is strongly encouraged. *LSIS Site:* On the Cygnus Business Centre site retain existing businesses where possible, ensuring industrial floorspace is intensified and access to a consolidated shared service yard is retained. 10% of new industrial floorspace is to be affordable.

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			access to a consolidated shared service yard is retained. 10% of new industrial floorspace is to be affordable. This appears to mis-identify our client's land as part of the LSIS, when in fact the 'Asiatic Carpets site' (i.e. the land west of Dalmeyer Road in our client's ownership) is not designated as LSIS. The requirements listed under this section are therefore also not in accordance with Policy BSSA1 of the newly adopted Local Plan. This states the following requirements for the allocation *"The premises west of Dalmeyer Road are a local employment site, and the east is designated as a Locally Significant Industrial Site (LSIS). Redevelopment will be consistent with London Plan policy E7 and Brent Local Plan policy BE2 and BE3. It will be subject to a masterplan-led approach, demonstrating comprehensive development will result in overall industrial floorspace totalling the maximum viable that can be achieved from the existing local employment site, and from the LSIS a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater." (our emphasis added)* Therefore, the requirements of the local plan are as follows: - Local Employment Site (i.e. west of Dalmeyer Road) – Overall industrial floorspace is the maximum viable that can be achieved; - LSIS (i.e. east of Dalmeyer Road) – Minimum plot ratio 0.65 or the existing industrial floorspace total The above approaches are consistent with Policies BE2 & BE3 of the Local Plan. However, the wording of the SPD does not currently mirror this, as for our client's land the stated aim is to '*maximise industrial floorspace and affordable workspace*', as opposed to the policy requirement to retain the maximum viable. The requirement for the floor space in the LSIS should also mirror the requirements of Policy BE2.		

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			We welcome that the above misalignment between the Local Plan Policy and the masterplan will be addressed as part of the CEGA SPD ahead of adoption and we consider that the wording on this issue provided on page 70 should match that contained within Policy BSSA1 of the Local Plan.		
E013-5	Simply Planning on behalf of Kelaty Properties LLP	**BSSA1 Asiatic Carpets Proposed Massing/Land Use Plans**	Concerns raised about the proposed massing and land use plan which is provided on page 71 of the draft CEGA SPD, reservations about the clarity of this approach as the SPD does not make it clear at any point this is how these plans should be used or perceived. We believe that inclusion of such a plan without explanation as to its purpose, will be misleading to all stakeholders involved with the growth area. Therefore, we consider a revision to the masterplan is required which undertakes one of the following: ▪ Removal of the proposed massing / land use plans for all allocations within the document; or ▪ A very clear and detailed explanation as to the purpose of these plans, that they are not intended to show the final design or layout for the site allocations and that these will rather be formulated through pre-application discussions with the Council and a public consultation process as developments are brought forward within the allocations. Failure to include this explanation is going to result in significant confusion as it would be understandable that members of the public would expect development to be delivered in line with these plans, unless it is made clear that this isn't the purpose of these plans within the adopted CEGA SPD. To ensure our concerns about the proposed massing / land use plans on page 71	Land use and massing plans for the site allocations articulate an acceptable form of redevelopment and an indication of the site's potential uses and development capacity. Detailed scheme proposals will however be evaluated on their own merit and their contribution to the comprehensive redevelopment of the area when they come forward at application stage. Future proposals are expected to adhere to the principles and urban design framework set within the SPD and work in partnership with adjacent landowners to avoid compromising the potential wider redevelopment of the site. Clarification of this will be provided by amending the SPD in relation to the purpose of the land use and massing plans.	Text added Section 4.2: *4.2.2 Land use and massing plans articulate an acceptable form of redevelopment and an indication of the sites potential uses and development capacity. Detailed scheme proposals will however be evaluated on their own merit and how they contribute to the comprehensive redevelopment of the area when they come forward at application stage.* Future proposals are expected to adhere to the principles and urban design framework set within the draft SPD and work in partnership with adjacent landowners to avoid compromising the potential wider redevelopment of the site.
E013-6	Simply Planning on behalf of Kelaty Properties LLP	**Urban Design**	The proposed massing and land use plan shows a primarily one storey industrial building within the heart of the allocation, which is set between public open space and residential-led buildings of 10 and 7 storeys.	The film studio has been placed in closer proximity to the High Road to reduce the need for large service vehicles to access the residential areas. Taller buildings have been allocated closer to the High Road as it is an intensification corridor.	No change.

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			This cannot be considered a good placemaking approach to development, as in land use and building heights. The central building will appear an alien and incongruous development in the streetscene. The service yard will also require enclosure, which will mean that the allocation will lose any sense of openness and will likely have unattractive metal fencing adjoining the public open space. We consider this building should be located to the north of the allocation, then a more composite mixed-use development could be provided using the central and southern area of our client's land.	Designs for the site allocation are illustrative and provide developers an indication of an acceptable urban planning and design approach to the potential site development. Individual schemes will be evaluated on their own merit and how they contribute to the comprehensive development of the area when they come forward for planning. Future proposals are expected to adhere to the principles and urban design framework set within the draft SPD and work in partnership with adjacent landowners to avoid compromising the potential wider development of the site. We suggest submitting a formal pre-application advice to discuss potential proposals further.	
E013-7	Simply Planning on behalf of Kelaty Properties LLP	**Affordable Workspace**	The site layout shows the provision of four storeys of affordable workspace within our client's land. Policies BE3 and BSSA1 of the Local Plan only require our client's land to deliver the maximum viable replacement industrial floor space. It is therefore quite feasible that the scheme will result in a net loss of industrial floor space, meaning no affordable workspace is required to be provided under Policy BE1.	The location of affordable workspace provision is illustrative. Clarification will be provided on that. As noted, if it is viable to replace more than 3,000sq.m. of employment floorspace, then in accordance with policy BE1, 10% of that floorspace should be affordable. This is considered to be quite possible on the Asiatic carpets site, especially given current values being achieved on industrial floorspace and demand for large scale indoor filming studios within the wider London area. It is accepted that the diagram as currently depicted is incorrect as the distribution of affordable workspace is unlikely to be so concentrated and the SPD will be amended to reflect this.	Massing diagrams on Section 6 will be updated to indicate that affordable workspaces will be considered on the scheme's entirety.
E013-8	Simply Planning on behalf of Kelaty Properties LLP	**Co-location within the LSIS**	The land to the east of Dalmeyer Road is designated as Local Significant Employment Site (LSIS). Policy BE2 of the Local Plan identifies criteria a) to g) which are required to be met for co-location of residential uses within an LSIS to be accepted.	Designs for the site allocation are illustrative and provide developers an indication of an acceptable urban planning and design approach to the potential site development. Individual schemes will be evaluated on their own merit and how they contribute to the comprehensive development of the area when they come forward for planning.	Please see change E013-5.

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			The proposed massing and land use plan shows no affordable workspace within the LSIS land and so accordingly does not meet the criteria of Policy BE2 for co-location to be acceptable. In addition, we do not believe the layout would provide a high standard of amenity or that the conflicts between land uses could be mitigated, given that all the land around the building is service yards for the retained industrial units.	Future proposals are expected to adhere to the principles and urban design framework set within the draft SPD doc and work in partnership with adjacent landowners to avoid compromising the potential wider development of the site. Clarification will be provided regarding the purpose of the massing/illustrations.	
E013-8	Simply Planning on behalf of Kelaty Properties LLP	**Deliverability**	Appendix F shows that 41 units would be delivered within the Cygnus Business Park (which is designated as LSIS) during the latter years of the SPD period. We consider that there is not a realistic route to the delivery of this housing. The SPD acknowledges that 35 freehold and leasehold occupiers are within Cygnus land, meaning that it will not be possible to mobilise this as a private development.	The masterplan SPD will support development up to 2041. Physical, social and economic conditions in the area will change over this time, and we support the opportunity for landowners to work together to redevelop the site.	No changes.
E013-9	Simply Planning on behalf of Kelaty Properties LLP	**Viability**	The appraisal shows the BSSA1 allocation option 1 (which is that with no major retail scheme and which closest resembles the masterplan scheme) as having a £448,465 surplus with 35% affordable housing. The testing shows this drops to a £186 deficit at 36% affordable housing. As such, a 1% increase in affordable housing results in an approximate £450k reduction in the viability of the scheme. The Policies of the Local Plan and London Plan, require 50% affordable housing and this is reflected on page 70 of the draft CEGA SPD. Therefore, a policy compliant affordable housing scheme will result in an approximate £6.3m deficit; The appraisal is based on August 2021 base rate building costs, which have significantly increased since this time due to increased in energy and building material costs. In addition, these costs do not account for the developments being required to be carbon zero, which will add a further substantial cost;	Brent Local Plan Policy BE3 requires the maximum viable replacement of existing employment floorspace on LES allocated for development. London Plan policy H5, criterion B3 requires mixed use development on non-designated industrial sites to provide 50% affordable housing only when redevelopment results in a net loss of industrial capacity. As such, providing the applicant reprovides existing industrial capacity, 35% affordable housing would be considered sufficient to meet policy H5 requirements. Given current values being achieved for industrial floorspace it is considered likely that this will be possible and that the viable 35% affordable housing provision can be achieved. Please refer BNPP response dated 6/2/23 at the bottom of this document – Annex A. Any financial viability issues will need to be tested at the planning application stage and a detailed assessment submitted with the planning application.	No change.

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			c. The two options assessed for the Asiatic Carpets site allocations do not reflect the schemes shown within the draft CEGA SPD; d. The benchmark land values vary between the two assessed options, whereas benchmark land values for the same sites should be consistent; e. The levels of affordable workspace are also not consistent with the massing and land use plans shown within the draft CEGA SPD; and f. The developer profit levels adopted in the options (these being 17% for private housing, 15% for commercial floor space and 6% for affordable housing) are unduly conservative for a complex development site such this, which includes multiple assets classes which would be largely speculative in nature and many potentially unknown development abnormals. There will be a financial viability issues when our client progresses their site to planning application stage. Policy BE3 of the Local Plan requires the development of our client's land to achieve the retention of the maximum viable levels of industrial floor space. The affordable housing policies of the Local Plan and London Plan require the provision of 50% of affordable housing to be acceptable. Therefore, if this is to be achieved, using the viability evidence which underpins the draft CEGA SPD, it will require a significant reduction in industrial floor space, as the maximum viable provision will be significantly depressed by the need to address the shortfall between the tested 35% affordable housing against the Policy requirement of 50%.	This will then need to be independently tested on the Council's behalf and the conclusion of this assessment will inform the need for any amendment to affordable housing provision.	
E014-1	Environment Agency	**Flood Risk**	We are pleased to see the SPD includes a Development Principle on FW1 Flood Risk Assessment, and that reference is given to all forms of flooding and the importance of considering climate change. All development within the growth area should be in accordance with the National Planning Policy	The principles within the SPD are there to address the specific issues faced by the Growth Area. In all cases applications will be assessed against the local Development Plan, including consideration of flooding.	No change.

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			Framework (Chapter 14), London Plan Policy SI 12 Flood risk management, and Brent Local Plan Policy BSUI3 Managing Flood Risk.		
E014-2	Environment Agency	**Sustainable Drainage System (SuDs)**	We support Development Principle FW2 Sustainable Drainage and welcome the commitment that development proposals including a Sustainable Drainage Strategy. To strengthen this, we recommend that a stronger focus is specifically given to the use of sustainable urban drainage systems (SuDs). We would expect the SPD to more clearly demonstrate how development in this area can embed SuDs, in line with Brent Local Plan Policy BSUI4 which requires all major development to use appropriate sustainable drainage. This is also supported by London Plan Policy SI 13 *Sustainable Drainage* and Policy SI 5 *Water Infrastructure* (including the retrofitting of water efficiency measures). Therefore, we recommend that consideration is given to specific opportunities and the types of SuDs which can be incorporated across the Church End Growth Area.	This is agreed and the SPD will be amended to reflect the priority that should be placed on SUDs.	Text Added on Section 5.5 Climate Change and Sustainability Principle FW2 Sustainable Drainage: Reduce impact on the current drainage regime through a Sustainable Drainage Strategy, to manage the flow and rate of surface water entering drains and sewers through infiltration methods. *Methods used should prioritise naturalised Sustainable Urban Drainage Systems (SUDS) and should be incorporated into public realm buffer strips within developments sites as well as integrated in the public highway space where possible.'*
E014-3	Environment Agency	**Air Quality**	In reference to the Development Principles on Air Quality and Pollution on page 63, the policies in this SPD should follow Brent's Local Plan Policy BSUI2 *Air Quality* which states: "Major developments within Growth Areas and Air Quality Focus Areas will be required to be Air Quality Positive and elsewhere Air Quality Neutral. Where on site delivery of these standards cannot be met, off-site mitigation measures will be required". We note this policy does not fully reflect London Plan Policy SI 1 *Improving air quality,* which requires all major development requiring an Environmental Impact Assessment (EIA) to be air quality positive (AQ+ve) and all development (with some very minor exceptions) to be air quality neutral. Having said this, we also note that London SPDs on air quality positive and air quality neutral have not yet been published. Therefore, we	Development principle AQP1 reflects policy BSUI2. This states that all major development is required to be air quality positive. As noted, Brent Local Plan policy BSUI2 requires all major developments within growth areas to be air quality positive, which although different to London Plan policy, is adopted policy. To reflect this elevated policy status and the fact air quality positive development is required SPD principle AQP1 will be amended.	Text revised, Section 5.5 Development Principles: AQP1 Air quality positive: All major development ~~should be air quality positive.~~ *within Growth Areas and Air Quality Focus Areas will be required to be Air Quality Positive*. *Where on site delivery of these standards cannot be met, off-site mitigation measures will be required*. Design should be informed by a preliminary Air Quality Assessment and Air Quality Positive Statement to ensure air quality is considered from the outset. (Local Plan policy BSUI2)

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			recommend revisiting this policy when they are available.		
E014-4	Environment Agency	**Green and Open Spaces**	To strengthen Development Principle UBH2 Biodiversity gains, we recommend that this policy specifically references a minimum net gain in biodiversity. In line with the Environment Act 2021, this should be a minimum of 10% net gain. However, a higher gain in biodiversity in this area of the borough would help to promote the improved social behaviours and health benefits for this more deprived area, in line with the SPD's vision. It is also important to note that if the baseline of biodiversity is already low in this area, then higher gains can be made more easily and so should not be avoided.	The sites currently lack biodiversity. As such it is considered that the Urban Greening Factor requirement of UBH1 is likely to far exceed a 10% net gain in biodiversity. Nevertheless, for clarity the SPD development principle can be updated to strengthen biodiversity gains.	Text added: UBH1 Urban Greening factor: Aim to meet the Urban Greening Factor (UGF) of 0.4 for developments that are predominantly residential and 0.3 for those predominantly commercial (excluding B2 and B8 uses). *The minimum net gain in biodiversity should be10% in line with the Environment Act 2021*. (London Plan policy G5)
E014-5	Environment Agency	**McGovern's Yard**	In reference to site allocation BSSA8: McGoverns Yard, the 'Green, Open and Play Spaces' noted on page 90 does not suggest on site improvements. Green infrastructure such as green roofs, green walls and tree planting could still be considered despite a lack of space. There is also the potential for the use of bee bricks, bat bricks or bird nest boxes throughout the new buildings. These should all still be implemented in addition to any offsite green spaces. Therefore, we recommend further consideration is given to the biodiversity improvements that can be delivered on this site.	SPD principles UBH1 and UBH2 require the provision of on-site greening enhancements. The green, open and play space references are explicitly in reference to dedicated public open spaces, which cannot realistically be delivered on this site. Therefore, contributions for off-site local provision within the growth area are being sought. This will facilitate delivery in a more appropriate location. Nevertheless, clarification can be provided on the provision of other green infrastructure in relation to Policy BSSA8 in the SPD.	Text added, BSSA8, Policy Requirements Green, Open and Play Spaces: Due to the nature of the site there is limited scope for introducing new green spaces*. Green roofs, green walls, tree planting and elements that support biodiversity are encouraged.* Financial contributions will be required towards off-site open space and play provision.
E014-6	Environment Agency	**Waste**	Regarding waste management, we would expect the SPD to support London Plan Policies SI 7 *Reducing waste and supporting the circular economy*, and Policy SI 8 *Waste capacity and net waste self-sufficiency*. This would include ensuring that there is sufficient space within developments for refuse collection vehicles; the separation of waste collections (household and recycling); and ensuring that demolition waste produced during construction is re-used on site to the greatest extent possible.	Waste management plans will ensure sufficient space is provided in accordance with standard requirements, and that these are well located and serviceable, and provide for the various wastes produced in a mixed-use development. Principles W1 and W2 require the consideration of the circular economy which addresses reductions in demolition/construction waste. The Growth Area does not include a dedicated waste facility. As noted above, the removal and storage of waste from individual developments will be outlined	Text added, Section 5.5, Development Principles: W3 Storage: Carefully consider refuse storage and collection systems that support recycling, in the context of a mixed-use industrial and residential development. Development should be supported by a Site Waste Management Plan and Operation Waste Management Plan. (London Plan policy D6, ~~and~~ SI7 *and Policy SI 8*).

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			As a general comment when planning development in growth areas, we strongly recommend that waste sites and operations are kept separate to residential development areas, to minimise the possible conflict between regulated industry and residents regarding issues such as pollution (noise, dust, odour etc).	in waste management plans, ensuring the various conflicts between residential and industrial uses are addressed in accordance with principle W3. Reference within the SPD related to principle W3 to policy SI 8 is however considered appropriate.	
E014-7	Environment Agency	**Contamination**	The sensitivity of this area in respect to groundwater vulnerability is low, however we have the following comments to make regarding contamination and land quality. In reference to Development Principle AC4 Contamination, it should be ensured that any preliminary risk assessment and subsequent site investigation and remediation strategies at sites with land affected by contamination should be undertaken by a competent person. The National Planning Policy Framework (NPPF) paragraph 183c) defines a competent person (to prepare site investigation): "A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation". Please also see the following generic advice with respect to contaminated land issues: - Specific National Planning Policy Framework (NPPF) paragraphs 174 and 183 should be considered - Relevant guidance such the Environment Agency's Approach to Groundwater Protection and Land Contamination Risk Management (LCRM) should be promoted - The Approach to Groundwater Protection should be considered with regard to development proposals that we would object to in principle. - Policies should require developers to submit a Preliminary Risk Assessment (PRA)	The Council will only recognise associated risk assessments which have been prepared by professionals. This is a detail which is already included in the NPPF as you note and does not require duplication here. The same is true of the rest of the guidance, which although welcomed, is not required for inclusion within the SPD itself. The SPD's principle AC4 would however benefit from additional reference to the stages post any preliminary contamination risk assessment.	Text added, Section 5.5, Development Principles, Agent of Change and Contamination: AC4 Contamination: Ensure development does not increase exposure to contamination. A preliminary contamination risk assessment *and subsequent site investigation and remediation strategies* will be required, and any necessary remediation measures followed before construction commences. (Local Plan policy DMP1)

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			together with a planning application where land is potentially contaminated. - Policies should require developers to ensure sites are suitable or made suitable for intended use. - Policies should require developers to prevent discharges to ground through land affected by contamination.		
E014-8	Environment Agency	**Site Allocations**	In consideration of the six site allocations detailed in Chapter 6, site specific geology will need to be considered for developments where deep piled foundations are proposed. Should deep foundations penetrate through the London Clay to deeper, more sensitive aquifers, then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised. Certain industrial activities (such as an installation or waste activity) will require an Environmental Permit. Operators of any sites allocated for industrial use should use the guidance for specific permitting requirements for their site, and if further guidance is required then contact the Environment Agency.	Permits may be required but these will not be a planning consideration, and therefore, will not require inclusion within a planning decision. Nevertheless, reference to considering the impact of foundations on ground water within the SPD for site allocations more likely to accommodate taller buildings is considered appropriate.	Text added: Policy requirements – Planning Considerations BSSA1, BSSA2, BSSA4, BSSA5: *Site specific geology will need to be considered for developments where deep piled foundations are proposed. Potential need for a Foundation Works Risk Assessment (FWRA) could be required to ensure that the risks to groundwater are minimised.*
E015-1	Greater London Authority (GLA)	**General**	In relation to the Mayor's opinion on general conformity with the London Plan, it is considered the SPD is in general conformity with the London Plan subject to collaboration in relation to London Plan Policy E7. However, further work is needed to address and clarify matters. For example, on building heights, industrial capacity and mix of uses. While we welcome the work done to date, in particular the prior engagement programme and involvement of local businesses, landowners and the wider community, it is unclear whether the preparation of this Masterplan aligns with guidance set out in the 'Industrial intensification and co-location through plan-led and masterplan approaches' Practice Note in regard to Stage 1 and Stage 2 outputs. In particular, collaboration	We welcome the Mayor's consideration that the SPD is in general conformity with the London Plan. On London Plan policy E7, criteria B states the following regarding co-location on LSIS: 'This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.' This makes it clear that co-location through masterplanning can take place on LSIS land providing it is either plan-led (i.e. designated for such uses in an adopted Local Plan), *or* it is masterplanned in	No change.

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			with the Mayor and his representatives in exercising his planning functions is at a relatively early stage.	collaboration with the Mayor. Note that if it is plan-led, collaboration with the Mayor is not explicitly required, and therefore cannot be a consideration when determining if its delivery is in general conformity with the London Plan. Brent's Local Plan identifies the LSIS sites included within the Church End Growth Area Masterplan for masterplan-led co-location through Local Plan site allocation policies BSSA1, BSSA2, and BSSA4. Nevertheless, the LB Brent appreciate the GLA's reasonable input, and wish to work with them to meet the strategic needs of the Greater London Area. Brent Council has consulted the GLA throughout the development of the masterplan. The initial discussion in February 2021 took place prior to masterplan design development to ensure we followed the correct process for the masterplan adoption. Once the first draft designs were developed, they were shared on October 1st 2021 with the GLA for feedback but we received no responses. Also, the project was match funded under the GLA Homebuilder Capacity Fund. In this situation it is reasonable of the Council to expect the GLA to be aligned in considering compliance with relevant policies. The team also met with the GLA on the 1st November 2022. At the meeting, the process for developing the masterplan was highlighted, including all engagement activities listed by the end of this document. Changes have been incorporated as part of the new version of the document to emphasize more clearly the approach for employment spaces on LSIS and LES. The masterplan SPD follows the 'Industrial intensification and co-location through plan-led and masterplan approaches' by looking at LSIS sites; drawing on evidence of industrial supply and demand and identifying spatial context and non-	

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				standard uses. Once options had been appraised, it proposed areas for intensification and co-location and a quantum of industrial capacity that needs to be delivered, balancing specific local needs which have been addressed by the local community, i.e. lack of green spaces, need for community spaces and affordable homes to help tackle deprivation, housing overcrowding and health related issues. The review post statutory consultation has presented a final opportunity to review and amend the document, so it complies with GLA standards.	
E015-2	Greater London Authority (GLA)	**General**	Clarification and transparency which makes clear commitments to prioritising industrial re-provision, intensification and increased capacity for a range of industrial uses identified in London Plan policy E4.	A primary overarching principle of the document is Development Principle IE1. This requires industrial floorspace to be maximised on LSIS land, and for developments to achieve a minimum plot ratio of 0.65. Development Principle IE4 makes clear the need for a range of industrial uses to meet need, specialisms for which are noted against each individual site allocation. This is in accordance with Local Plan policy BE2, and London Plan policies E4-E7. Nevertheless, it is accepted that there is potential to strengthen these principles to better reflect development plan policies and aspirations by amending the SPD Principle IE1 and IE4.	Text added, Section 5.1 Land Use, Development Principle IE1: 'Maximise industrial floorspace through intensification. On Locally Significant Industrial Sites (LSIS), increase industrial floorspace with a target of achieving a minimum 0.65 plot ratio *or existing, whichever is greater. Development on LSIS must not result in a net loss of industrial floorspace* (Local Plan policy BE2).' Development principle IE4 'Provide a range of high quality industrial floorspace which is fit for purpose and reflective of borough needs, having regard to the site specific clusters and potential for specialisms as identified in the site allocations. *For LSIS only those uses listed under criterion A of London Plan policy E4 are acceptable* (Local Plan policy BE2)'
E015-3	Greater London Authority (GLA)	**General**	Clarity and transparency on the amount of industrial land to be lost, industrial capacity to be retained and reprovided and a breakdown of floorspace by use existing and proposed.	The SPD provides the amount of floorspace that needs to be re-provided on sites, this is either 0.65 plot ratio on LSIS or existing industrial floorspace, whichever is the higher. This is likely to result in greater industrial floorspace provision than currently	Appendix F included to clarify quantum of employment space re-provided on LSIS.

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				exists. This is in part because not all LSIS is used for Policy E4 compliant uses currently. It will be for the developer to propose the appropriate floorspace at the application stage. On LES it will be the maximum viable re-provision. Limiting the scope of what can be provided in terms of size and use of individual units is unlikely to be robust in terms of its flexibility to deliver an enduring masterplan. It is best that the market reflects needs as and when they arrive rather than the SPD being overly prescriptive.	
E015-4	Greater London Authority (GLA)	**General**	Amendment in the opening sentence of Paragraph 2.4.2 of the draft Masterplan SPD to delete reference to SIL. London Plan Policy E7 does not support co-location of industrial and residential use on SIL.	The London Plan does allow for intensification of SIL for industrial purposes, to potentially release parts for non-industrial uses including residential. Nevertheless, as Church End does not contain SIL, the reference to SIL shall be removed.	Text removed: Paragraph 2.4.2 'To meet these competing land pressures, London Plan Policy E7 allows for the intensification of ~~Strategic Industrial Locations (SIL) and~~ Locally Significant Industrial Sites (LSIS) through the co-location of industrial and residential uses.
E015-5	Greater London Authority (GLA)	**General**	A commitment to maintaining and securing a variety of industrial uses on LSISs including prioritising B2 and B8 floorspace, not just E class uses to ensure the full range of industrial uses as set out in London Plan policy E4 (as suitable for LSIS) and the Local Plan Policy BE2 is provided for. While the masterplan makes clear that much existing industrial land will remain, the amount of new/reprovision is unclear.	The SPD makes clear that all potential industrial uses are appropriate, including B2 and B8 uses. Explicit reference to B2 and B8 uses is made under a number of figures, suggesting future land use potential. The document does not seek to prescribe specific industrial uses. This would not be appropriate. Uses will be determined by a range of variables, including existing on-site uses and their desire to be worked into any redevelopment, and market demand which will change over time. See proposed change for E015-2 with regards to Development Principle IE4 making explicit the range of uses appropriate within LSIS referencing policy E4. For Local Employment Sites, policy BE3 makes clear the range of appropriate uses.	Proposed change to include table (Appendix F) setting out existing and new provision of employment floorspace across site allocations. Appendix B and Appendix F LSIS sites allocation proposals are for workshops/light industrial uses and floorspace in line with relevant planning policy, with references to supermarket uses removed.
E015-6	Greater London Authority (GLA)	**General**	A commitment to phasing to ensure that the intensified industrial development is delivered and completed in advance of the residential component as per policy E7 and the Practice Note.	The London Plan refers to only the intensified industrial being completed before residential occupation, not re-provided industrial space in a mixed-use LSIS scheme. Nevertheless, it is agreed that in principle industrial elements of co-located	Added principle Industrial & Employment: *IE7 Phasing: 'On LSIS sites where residential is co-located with industrial, the industrial elements must be completed*

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				schemes, or schemes which intensify on one site to make space available for non-industrial use should be completed prior to occupation of that other use. The SPD IE7 principle can be amended to reflect this.	*in advance of any residential element being occupied, in accordance with criterion D2 of London Plan policy E4. This should be conditioned to ensure compliance.'*
E015-7	Greater London Authority (GLA)	**General**	Amendment of text and design principles to accurately reflect the London Plan Agent of Change (Policy D13). This requires noise sensitive uses to be designed and located to ensure there is no detrimental impact on existing industrial uses and to enable industrial areas to continue to operate successfully.	It is considered that the wording of Development Principle ACC1 in addition to paragraph 5.5.7 is sufficient, particularly given it references London Plan policies D13 and E7 directly, making explicit that the wider development plan requirements will be required. It is not considered necessary to further replicate this material.	No change.
E015-8	Greater London Authority (GLA)	**General**	Clarity on the status of the three LSISs going forward. We request the boundaries of the LSIS be indicated within the masterplan.	Accepted and the SPD will be amended to reflect the clear delineation of the LSIS boundaries.	Clear delineation of the LSIS boundaries to be indicated on figure 10.
E015-9	Greater London Authority (GLA)	**General**	Assurance that the approach is consistent with London Plan Policy E1 Offices which seeks to focus new office provision within town centres.	The SPD makes clear the range of uses which are appropriate for LSIS and LES sites, in accordance with policies E4 and BE2, and BE3 respectively. As such, unless existing offices are redeveloped, no further non-ancillary office space will be acceptable. Given the existing emphasis on industrial floorspace delivery, it is not considered necessary to include explicit reference to office uses and policy E1.	No change.
E015-10	Greater London Authority (GLA)	**General**	Clarification that sufficient yard space has been provided to meet the operational needs of the majority of existing and future industrial users. It should be ensured that the proposed development is designed to minimise conflict between movements, in particular access, servicing and delivery arrangements. Interfaces between existing and proposed uses should be appropriately managed through public realm interventions to ensure safety of occupiers and residents. A low quantum of public realm is proposed which is not proportionate with the forthcoming density. We query	It is considered that Development Principle TM3 makes clear the need to consider logistics and servicing arrangements, and along with Principles IE3 and H5, will ensure conflict between various uses will be minimised. The various measures to ensure this is achieved and amenity protected are included under the road typologies on page 37, and includes explicit reference under industrial yard for the need to have a green buffer between industrial and residential. Yard space arguably falls within the parameters of servicing however, explicit reference to it is made in E7, so on this basis for clarity reference can be made to it in the SPG.	Text added, Section 5.2, Development Principles, Traffic Management: Development Principle TM3: 'Development should be informed by Delivery and Servicing Plans. These should balance providing adequate access*, yard space* and servicing arrangements for industrial/commercial uses and residents whilst protecting amenity.' Technical innovation to consolidate delivery and construction transport as well as the use of non-motorised freight transport is supported and encouraged, including

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			the quality of the residential environment as a result of this.	The masterplan provides a balance of competitive uses. The sites, due to their intensity of use have comparatively high land values. This together with policy requirements such as maximising re-provision of industrial floorspace limit space to be freed up for non-built form. Public realm is provided to ensure connectivity is maximised but is reflective of the higher densities that are relatively characteristic of the wider area.	provision for electric vehicles. Consideration should be given to imposing safety standards for delivery and servicing vehicles at the site: minimum of FORS Silver, preferred of FORS Gold for all HGVs). (Local Plan policy BT3)
E015-11	Greater London Authority (GLA))	**General**	Clarification in the massing diagrams within Section 6 (Site Allocations) where indicative heights range from 6-10 storeys. This should be expressed in metres to align with the Local Plan's 18m threshold for tall buildings and the Brent Tall Buildings Strategy.	Diversity of uses will vary building heights. It is considered the masterplan is more flexible if it indicates building heights in storeys rather than meters. Clarity will be provided as part of the image's subtitle.	Heights in m have been added within massing diagrams subtitle.
E015-12	Greater London Authority (GLA))	**General**	Clarification/evidence that Local Plan Policy BE2 Strategic Industrial Locations and Locally Significant Industrial Sites is complied with, in particular net increase (b), figures are needed to demonstrate this, c) mix of uses especially storage, distribution and general industrial and potential conflict between uses (g): some wording changes are needed to better reflect the Agent of Change principle.	This has been dealt with in responses to previous points.	See proposed changes against E015-2 & E015-3. See comments against E015-07.
E015-13	Greater London Authority (GLA)	**4.2 The Masterplan P28**	A masterplan is required for Industrial co-location proposals in compliance with Policy E7B & D – It is unclear what iterative process Brent has been through with the Mayor and the GLA to distinguish an appropriate masterplan under Policy E7 in line with the industrial intensification practice note. Officers would welcome further engagement with the GLA to explore design principles to ensure high quality residential development is established alongside effectively operating Industrial uses. Masterplan should include Local Strategic Industrial Site boundaries.	The GLA's reasonable input, and the opportunity to work together to meet the strategic needs of the Greater London Area, and improve on the SPD and its outcomes is welcomed. Brent Council has consulted the GLA throughout the development of the masterplan. The initial discussion in February 2021 took place prior to masterplan design development to ensure the correct process for the masterplan adoption was followed. Once the first draft designs were developed, they were shared on October 1st 2021 with the GLA for feedback but also no responses were received. The project was match funded under the GLA Homebuilder Capacity Fund with the GLA so	Clear delineation of the LSIS boundaries to be indicated on figure 10.

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				it not unreasonable of the Council to assume that as was the case with the Neasden Stations masterplan work that the GLA has been similarly aligned in considering compliance with relevant policies. The team also met with the GLA on the 1st November 2022. At the meeting, the process for developing the masterplan, including all engagement activities listed by the end of this document was shared with those GLA officers. GLA officers clarified the need for demonstrating more clearly in the document the approach for employment spaces on LSIS and LES. These are changes that have been incorporated into the revised document to be adopted. The masterplan follows the 'Industrial intensification and co-location through plan-led and masterplan approaches' by looking at LSIS sites; drawing on evidence of industrial supply and demand and identifying spatial context and non-standard uses. Once options had been appraised, it proposed areas for intensification and co-location and a high quantum of industrial capacity that needs to be delivered, balancing specific local needs which have been addressed by the local community, i.e. lack of green spaces, need for community spaces and affordable homes to help tackle deprivation, housing overcrowding and health related issues. The post statutory consultation a final review and amendments to the document have occurred so it complies with GLA standards.	
E015-14	Greater London Authority (GLA)	**5.1 Land Use Development Principles Industrial & Employment P32**	IE1 Query the rationale for calculating the plot ratio. What does it accommodate space for? Does it include Amenity space for workers etc? IE1 Could provide more advice on how to intensify sites? Refer to policy E7 / relate to industrial design principles provided later in the document.	The 0.65 plot ratio reflects requirements of Local Plan policy BE2. It only includes the internal industrial floorspace, including any ancillary and supporting internal floorspace. The 0.65 plot ratio was previously included in the London Plan, and was evidenced as both deliverable, and having the potential to result in a general increase in industrial floorspace. This was evidenced by the GLA through the 'Analysis of plot ratios in industrial development	References to the GLA Industrial Intensification and Co-Location study to be added in the references section, Appendix G.

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				in London' evidence base document. The 0.65 has been shown to be generally deliverable in a number of industrial only, and co-located schemes within the borough. The SPD includes potential design solutions and principles on Section 5.4 Proposed Framework and includes explicit design principles under the same section. Contemporary approaches to industrial co-location are few, but given increased demand, developer appetite and understanding and GLA policy, as a concept it is likely to advance rapidly in the coming years. As such, these are considered sufficient for the purposes of the SPD. It is considered that Development Principle TM3 makes clear the need to consider logistics and servicing arrangements, and along with Principles ACC1 on the Agent of Change, IE3 and H5, will ensure conflict between various uses will be minimised. The various measures to ensure this is achieved and amenity protected are included under the road typologies on page 37. This includes explicit reference under industrial yard for the need to have a green buffer between industrial and residential.	
E015-15	Greater London Authority (GLA)	**5.1 Land Use Development Principles Housing P33**	IE3 Residential Co-location: Design mitigations should be applied to new resi units to allow for continued optimal use of existing industrial units. In line with Policy E7, it should be ensured that the proposed development is designed to minimise conflict between movements, in particular access, servicing and delivery arrangements. Interfaces between existing and proposed uses should be appropriately managed though public realm interventions to ensure safety of occupiers and residents. A low quantum of public realm is proposed which is not proportionate with the forthcoming density, officers query the quality of the residential environment as a result of this. Visual imagery or diagrammatic sections to support	Section 5.4 Design principles identify key principles to support mixed use developments. The masterplan SPD seeks to strike a balance between green spaces and building heights. CEGA is within an o pen space deficiency area and so provision of green spaces are one of the area's top priorities. Nevertheless, in order to provide the needed green space provision, enough development is needed to help fund the spaces. Building heights are within the limit as the area sits outside Brent's Building Strategy. Development Principle TM3 makes clear the need to consider logistics and servicing arrangements, and	No change.

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			development principles that relate to the local context would help to provide clarity on this.	along with Principles IE3 and H5, will ensure conflict between various uses will be minimised. The various measures to ensure this is achieved and amenity protected are included under the road typologies on Section 5.2 Proposed Framework. This includes explicit reference under industrial yard for the need to have a green buffer between industrial and residential. It is however agreed that there needs to be explicit reference to the requirement for sufficient yard space which has been addressed in TM3.	
E015-16	Greater London Authority (GLA)	**5.1 Land Use** **Development Principles** **Housing** **P33**	Housing policy headers could be confused with similarities to London Plan Housing policy references. H5 Residential Co-location: Currently refers to London Plan policy D13. Should also refer to Policy E7. H6 Accessible and Adaptable housing: refers to London Plan policy D7 should also refer to D5.	Agreed, the titles for section 5.1 of the SPD will be simplified where possible.	Text revised, Section 5.1 Development Principles: ~~Housing~~ *Residential* R1 ~~Housing~~ Target R2 ~~Housing~~ Mix and tenure R3 Specialist accommodation R4 Quality R5 ~~Residential~~ Co-location R6 Accessible and adaptable ~~housing~~ Text added: R5 Co-location: London Plan policy D13 & E7. R6 Accessible and adaptable: London Plan policy D7 & D5.
E015-17	Greater London Authority (GLA)	**5.1 Land Use** **P32-33**	Repetition of development principles IE3 & H5. Officers advise that H5 focuses on the proposed design mitigations for new residential uses to ensure that existing industrial units can operate to optimal use. IE3 could focus on ensuring an appropriate mix of industrial uses alongside industrial are chosen.	Agreed, IE3 should be amended within the SPD to focus on appropriate mix of uses operating at optimal use. IE4 already addresses the required mix of uses.	Text revised: IE3 ~~Residential~~ Co-location: *Deliver new industrial that provides an appropriate mix of uses that can operate to optimal use*. ~~housing that can sit comfortably alongside new industrial spaces. Mitigate any potential conflicts between uses and provide high quality environment for both residents and businesses.~~

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E015-18	Greater London Authority (GLA)	**5.2 Movement and Connectivity Proposed Framework P36**	The movement hierarchy is a useful tool however could provide more detail to ensure clarity on the management of movement conflicts that could occur.	Comment noted. In addition to following Healthy Streets design principles and associated guidance low speeds across the masterplan area will further improve cycle and pedestrian amenity as well as reduce risk of collision and injury in general and to the more vulnerable road users in particular. This is highlighted on section 5.2 Proposed Framework.	Text added para 5.2.3: *"An area wide 20mph speed limit is proposed with the aim to further support measures designed to enhance facilities and spaces for active and sustainable travel. In addition to following Healthy Streets design principles and associated guidance and calming measures such as improvements at junctions, speed humps, raised tables, introduction of trees in build outs or green buffer strips/SUDs, low speeds across the masterplan area will further improve cycle and pedestrian amenity as well as reduce risk of collision and injury in general and to the more vulnerable road users in particular."*
E015-19	Greater London Authority (GLA)	**5.2 Movement and Connectivity Development Principles Traffic Management P42**	TM3 logistics – residential access should be separate to industrial uses. – existing industrial uses should have continued effective operation.	Development Principle TM3 makes clear the need to consider logistics and servicing arrangements, and along with Principles IE3 and H5, will ensure conflict between various uses will be minimised. The various measures to ensure this is achieved and amenity protected are included under the road typologies on Section 5.2 Proposed Framework. This includes explicit reference under industrial yard for the need to have a green buffer between industrial and residential. It is however agreed that there needs to be explicit reference to the requirement for sufficient yard space which has been addressed in response to rep E07-11.	Please see rep E07-11.
E015-20	Greater London Authority (GLA)	**5.3 Green and Open Spaces Open and Green Spaces P45**	Whilst site constraints are recognised, the provision of increased residential capacity should be supported by public realm improvements and open space contributions. Potential to include roof gardens, pocket parks, greening boundaries between uses to provide mitigations to industrial uses. In order to establish a high-quality residential environment.	It is considered that this is achieved through a combination of Development Principles OGS1, OGS2, and OGS5. OGS1 seeks the delivery of new dedicated open spaces, as specified in the site allocations; OSG2 requires their connectivity with each other and the wider green grid; and OSG5 requires the general enhancement of the public realm through greater greening. This theme is recurrent throughout the	No change.

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				document which seeks to improve the public realm for occupants, and biodiversity potential for wildlife.	
E015-21	Greater London Authority (GLA)	**5.3 Green and Open Spaces Public Realm P50**	Open spaces and public realm should be inclusive and accessible for all. London Plan policy D8 should be included in development principles, with the current study reflecting poor accessibility to existing open spaces.	PL3 Inclusiveness addresses the point made.	No change.
E015-22	Greater London Authority (GLA)	**5.3 Green and Open Spaces Play and Recreation P46**	PLR2 Co-location of uses: unsure of wording – does it mean the provision of a variety of play opportunities for all ages? The terminology of the header could be altered to avoid confusion. PLR3 Inclusiveness – refers to London Pan Policy S4 (play and informal recreation) – officers suggest renaming as point does not acknowledge inclusive principles. Officers welcome inclusive play.	Wording in PLR2 can be amendment to provide clarification.	Wording revised: 5.3 Green and Open Spaces/ Development Principles PLR2 Co-location of uses: Co-locate formal play areas, informal play spaces and informal recreation spaces with places to dwell. Spaces should be designed to encourage social interaction *and a variety of play opportunities for all ages* ~~between all age groups in the community~~. (London Plan policy S4) PLR3 ~~Inclusiveness~~ *Inclusive Play:*
E015-23	Greater London Authority (GLA)	**5.3 Green and Open Spaces Public Realm P50**	PR5 Trees: repeats UBH4 Trees, is this intentional/necessary.	Agreed, repeated reference as set out in UBH4 in the SPD should be removed.	Removed UBH4 trees.
E015-24	Greater London Authority (GLA)	**5.4 Building Design and Architecture Design Principles P54**	Industrial design principles reflect good urban design principles. Suggest re-wording to encourage the provision of successful active frontages. Ie, Most active uses or operational making areas should be positioned at ground floor level along the street. Ensure high levels of visual permeability of ground floor uses adjacent to the street. The provision of green roofs / open spaces to provide amenity space for workers and residents creating better places. (Refer to the Industrial intensification and co-location study)	Agreed, an additional emphasis on active frontages in the SPD will ensure better place-making and vitality outcomes. It is agreed that green infrastructure can assist in improving amenity outcomes for employees in Church End and the SPD should reflect this.	*Text updated* Section 5.4 Building Design and Architecture Design principles: Provide positive *active* frontages~~ and support place-making~~. ~~Improving the setting of existing~~ heritage assets, ~~creating positive street frontages and addressing open spaces can do this. It also ensures a positive relationship with adjacent neighbours.~~ A*ctive uses or operational making areas should be positioned at ground floor level along the*

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					street. Ensure high levels of visual permeability of ground floor uses adjacent to the street. ~~Provide positive frontages and~~ Support placemaking. ~~Improving the setting of existing heritage assets, creating positive street frontages addressing open spaces can do this. It also ensures a positive relationship with adjacent neighbours.~~ *Provide quality urban environment and amenities for workers making better use of open spaces. Ensure there is a positive relationship with neighbours.*
E015-25	Greater London Authority (GLA)	**5.4 Building Design and Architecture Development Principles** **P55**	SCT2 Intensification and Co-location: As well as referring to design principles mentioned earlier in the document, consideration should be given to the existing local context for each site allocation, to influence the proposed development.	SCT2, in combination with the design principles identified on P54, are in specific reference to the complicated design considerations surrounding co-locating residential with industrial. In all cases, as with all planning applications, the immediate and wider local context will be a key consideration. As such, the suggested change is not considered necessary.	No change.
E015-26	Greater London Authority (GLA)	**5.4 Building Design and Architecture** **Building Heights** **P60**	Massing diagrams included on site allocations contradict the building heights statement. 'None of the proposals exceed 6 storeys (approx. 18m) With heights up to 10 storeys represented in the site allocation. – this would mean the provision of tall buildings by definition of the London Plan- This is not an allocated area for tall buildings in the Brent tall buildings strategy, as such would not be in compliance with Policy D9 of the LP2021. Clarification on proposed density should be provided. It would be helpful to distinguish between principles through an amendment of terminology. With the use of 'Must', 'Should' and 'Could' to provide a helpful prioritisation of requirements.	Paragraph 5.4.15 is discussing the existing heights, particularly in relation to Hornby Court to the end of Church Road, and not future proposals. The text can be amended to provide further clarity. Agree this is not in Brent's Tall Building Strategy. London Plan policy D9 for tall buildings in terms of heights applies where Boroughs have not adopted their own locally specific policy. Brent's Local Plan includes policy BD2 which identifies tall buildings as being those which are greater than 30m in height. The masterplan does not propose buildings in excess of 30m (~10 storeys) in height and is therefore compliant with D9 and BD2. Whilst the suggested categorisation appears reasonable, after further analysis it is considered	*Text revised* on Section 5.4, Existing Framework, Building Heights: 5.4.15 *More recent* ~~New proposed~~ developments at the end of Church Road demonstrate a gradual increase in height, though none of the proposals exceed 6 storeys (approx 18m).

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				that it would be difficult to implement and would likely undermine outcomes. This is because a number of the principles do not easily fit within the proposed categories. In addition the principles could lose flexibility of application even though otherwise overall acceptable outcomes would be delivered. What's essential for one scheme may not be for another etc. They are there to provide guidance for applicants as to the Council's expectations. The Council will judge whether or not they have correctly applied each of the principles as appropriate.	
E015-27	Greater London Authority (GLA)	**5.4 Building Design and Architecture** **Building Heights** **P60**	Further information should be provided on which existing industrial units will be retained as existing or renovated, if so ensure an appropriate business relocation strategy is provided.	The proposed business relocation strategy was developed based on the feedback received from landowners, developers and businesses. A great proportion of land in BSSA2 and BSSA4 have not been allocated for redevelopment due to the age of the buildings, their good performance, as well as land ownership complexities. The detailed business relocation strategy can be found in section 7.4.	No change.
E015-28	Greater London Authority (GLA)	**BSSA1**	BSSA1 Asiatic Carpets: Design mitigations should be applied to new residential units. Consideration should be given to renovation of retained existing industrial B2/B8/E uses ie, provision of a biodiverse green roof. How will separation in movement be managed to ensure pedestrian safety. Particularly where the new East / West pedestrian route is adjacent to a dedicated industrial servicing route.	Development Principles throughout the SPD support and provide details on how to address the aspects mentioned. Site specific guidance is provided as part of the Site Allocations. More detailed comments will be provided at planning application stage. However, it is agreed that further detail can be incorporated in the SPD to secure pedestrian safety.	Add text Section 6.2 BSSA1 Design Principles: *Conflict of movements to be managed carefully. Pedestrian safety needs to be prioritized while ensuring a high quality and welcoming public realm.*
E015-29	Greater London Authority (GLA)	**BSSA2**	BSSA2 B&M Home Store and Cobbold Industrial Estate: Clarify how access to southern community use and workshops will be managed to ensure pedestrian safety through public realm interventions. Provision of pedestrian crossings etc. Concerns with blank frontages along public realm. Activation is key to creating better places. (architecturally rich blank frontages proposed)	Development Principles throughout the SPD support and provide details on how to address the aspects mentioned. Site specific guidance is provided as part of the Site Allocations. More detailed comments will be provided at planning application stage. However, it is agreed that further detail can be incorporated in the SPD to ensure development on the ground floor is active as well as to ensure movement conflicts can be addressed accordingly prioritising pedestrians' safety.	Text revised, Section 6.2 BSSA2, Design Principle ': Create dynamic and architecturally rich ~~blank~~ *active frontages along all pedestrian routes to maximise pedestrian's safety. When blank facades* ~~are Cobbold Road and wherever else these~~ are unavoidable, *development should draw*~~ing~~ on characterful exemplars, *demonstrating how safety will be upheld.* '

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E015-30	Greater London Authority (GLA)	**BSSA4**	BSSA4 Chapman's and Sapcote Estate: Residential development and workspace directed towards Colin Rd and High Rd – The industrial function of Sapcote Trading Centre and Chapman's Park Industrial Estate will be protected and intensified. Consideration should be given to the provision of green open spaces to provide high quality, welcoming residential spaces. Whilst constraints are understood, a high quantum of residential development should be supported by sufficient open space. Consider the provision of pocket parks sheltered from industrial uses, roof gardens with appropriate mitigations to noise and air pollution. How will light industrial uses correspond to existing high street uses, considering alternative floor to ceiling heights required for these uses. Relationship to existing frontage should be considered. The massing diagram should indicate where proposed service routes and pedestrian public realm and movement will occur, including residential entrances to ensure that there will be no conflict in movement. This is key to the understanding and success of the combined uses.	The site is unlikely to see the delivery of public open space due to its numerous constraints. As such, general enhancements to the public realm and the provision of financial contributions for off-site provision are set out in the SPD. Private communal amenity for residents will also be provided at roof level. However, if constraints can be overcome, the Council would be supportive, and encourage the delivery of on-site open space. This can be reflected in revised wording with this part of the SPD. The frontages along Dudden Hill Lane and the High Road to be occupied by industrial uses are not adjacent to any existing commercial frontages. If this were to occur the Council would consider its cohesion with the existing context on a case by case basis.	Text added BSSA4 Policy Requirements: Green, Open and Play Spaces Due to the nature of the site, there is limited scope for introducing new green spaces. Landscaping improvements should be focussed on the adjacent stretch of High Road and tree planting and greening maximised throughout the site. *We will support schemes that provide pocket parks and other creative green interventions i.e. roof gardens if those can be sheltered from industrial uses and appropriate mitigations to noise and air pollution are in place*. Financial contributions will be required towards open space off-site and play provision.
E015-31	Greater London Authority (GLA)	**BSSA5**	BSSA5 Willesden Bus Depot: Presume retention of existing bus depot? The Agent of Change principle would need to be applied to any redevelopment to ensure adequate protection for residents or occupiers was provided, taking into account the 24/7 nature of bus garage operations. If so, is there possible opportunity for improvements to the existing condition of the depot? ie, Inclusion of a biodiverse green roof, to improve outlook of new residents and contribute to the urban greening factor. Massing diagram should identify servicing routes and proposed public realm like earlier site allocations, to ensure there will be no conflicts between movement (bus and residential uses). Should liaise with TFL for any proposed changes to the bus stand.	The bus depot function will remain and there are no plans for this role to change. Opportunities for improvements have been considered, hence the option shows consolidation of the bus depot's offices to the new development facing the High Road. The proposed scheme has received support from the landowners and engagement with them will continue to occur to keep proposals and views on potential development up to date. The agent of change requirement is covered by principle ACC1 in accordance with policies D13 and E7. For now, there are no opportunities to increase greening or public realm routes throughout the site due to its operational needs.	No change.

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E015-32	Greater London Authority (GLA)	**BSSA8**	BSSA8 McGovern's Yard: Should create active frontages along the High Rd and proposed public realm. The co-location of uses should respond to historical assets and existing residential terraces, providing appropriate yard space for servicing needs, welcoming residential entrances and high-quality residential units.	Design principles on p91 already addressed the points noted.	No change.
E015-33	Greater London Authority (GLA)	**Appendices**	Suggested additional London Plan guidance to add to Appendix D –Industrial Intensification and Co-location Study. Characterisation and Growth Strategy LPF, Optimising Site Capacity: A Design Led Approach LPG and Housing LPG.	Agreed, these references within Appendix G of the SPD would be helpful.	Add guidance suggested to Appendix G Additional Guidance.
E016-1	The Coal Authority	**General**	As you are aware, Brent Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on this consultation.	Comment noted.	No change.
E017-1	Canal River Trust	**General**	I can confirm that the Canal & River Trust have no comments to make as the area is well away from the Grand Union Canal or Welsh Harp/Brent Reservoir and Brent Feeder. Please feel free to contact me if you have any further queries.	Comment noted.	No change.
E018-1	Thames Water	**General**	We support the flooding and water management policies set out in Section 5.5 and welcome the reference to engagement with the water utility provider at an early stage to discuss water and wastewater capacity.	We welcome the support.	No change.
E018-2	Thames Water	**General**	In relation to the water efficiency requirements set out in FW3, it should be noted that planning conditions are required to be attached to any planning approval requiring the 105l/p/d optional water efficiency standard to be required through Building Regulations. If it is intended to rely on the Building Regulations to deliver the water efficiency standard in line with Policy SI5 of the London Plan, then planning conditions requiring the optional requirement to be delivered will need to be attached to any planning permissions for new residential development.	It is accepted that the SPD would benefit from amendment to FW3 to refer to implementation being secured via condition.	Text added, Section 5.5 Development Principles: FW3 Consumption: Achieve the target for mains water consumption of 105 litres or less per person per day and be supported by a Water Efficiency Assessment. *This is required to be secured via condition. To achieve this, developments* should incorporate water management methods such as smart metering, water-saving and greywater recycling.

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					(Local Plan policy BSUI4).
E019-1	Brent Cycling Campaign	**Vision**	The vision is promising as demonstrated by the illustration on page 5, which was also used when this plan was presented to the cabinet in a meeting on the 12th of September 2022. But we fear the lack of details may not lead the Master Plan to achieve this vision.	The SPD can be amended to provide the details requested to support the delivery of the vision.	Please see updates following TfL comment E07 onwards.
E019-2	Brent Cycling Campaign	**5.2 Movement and Connectivity**	The Key transport section is 5.2: Movement and Connectivity, from page 36 (in the document, as opposed to PDF page numbering). We welcome the ambition and active travel principles as detailed in this section. It is also encouraging to read that the barriers to cycling have been accurately acknowledged (i.e, severance lines, mostly non-existing provision and below-standard existing provision). However, we regret that this document does not include one single mention of Disabled cyclists.	Comment noted. We acknowledge the importance of designing the cycle infrastructure to support inclusive cycling.	Development Principle added within Section 5.2 Movement and Connectivity: ST 6 *Inclusive cycling: Cycle infrastructure needs to support people with physical or mental disabilities, new cyclists, the elderly, injury rehabilitation referrals and those lacking the confidence to take a bicycle out on the road.* Amendments to the section were made to ensure the text is concise and fits within the allocated section.
E019-3	Brent Cycling Campaign		On page 37, in the hierarchy "Local Street" there's a picture of a low-traffic neighbourhood (LTN) but there is no mention in the text. On page 37, in the street hierarchy "Cycle Path min 2m" is mentioned in the 'Strategic Connectors', but it is not clear whether this is single, or bi-directional.	Comment noted. Images on Section 5.2 Movement and Connectivity, Proposed framework are for illustrative purposes.	Please see updates following TfL comment E07-5 onwards. Observation has been added to highlight images and sections are for illustrative purposes.
E019-4	Brent Cycling Campaign		On page 39, in "Proposed interventions" we have "protected cycle facilities" and "cycle lane and facilities" listed separately. Details are needed, or more specific wording. The level of protection should be determined by the speed of motor vehicles and vehicles per hour as well as the nature of that particular street/road. Paint does not count, nor does an Advanced Stop Line. On the same page, there doesn't seem to be an overlap	More clarity will be provided through amendments to the SPD on proposed interventions as well as in the indication of the LTNs in a diagram on Section 5.2 Proposed Interventions.	Figure 30 to indicate location of LTNs. Key and text revised to ensure numbering corresponds with key. Private roads have been removed from Figure 30 as improvements will take place as part of site allocations redevelopment.

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			between junction improvement and cycleway improvements. Junctions are crucial to enable cycling and to deliver on the active travel principles listed on page 41. We need clarifications as to what treatment on junctions will be proposed. On page 39 "Low Traffic Neighbourhood Cells" are indicated, but neither marked on the map nor is the infrastructure proposed (restrictions) to achieve this.		
E019-5	Brent Cycling Campaign		On page 40, Option 1 suggests a low-traffic neighbourhood (LTN) or bus gate type of intervention without stipulating that cycles will be allowed. Option 2 is very unclear, as it implies that this will close Church Road to through motor traffic completely. Throughout this document, there is no mention of the current national walking and cycling guidance (LTN 1/20) or LCDS. It is neither in the body of the plan or listed in the additional guidance, and this is rather worrying.	This is accepted. The SPD can be amended to provide greater clarity on the proposed interventions for cyclists in Option 1, which Option 2 will reflect. In addition AT4 can make appropriate reference to cycling provision as set out in Local Transport Notes and London Cycling Design Standards.	Text added: Option 1 - Create a low-traffic environment on Church Road: The proposal would restrict through traffic along Church Road between Ilex Road and Roundwood Road. Only London buses *and cyclists* could travel through this section. Daytime servicing and loading for local businesses would be restricted to early morning and from early evening. Bus stops would be relocated to each end of Church Road. Option 2 – *Building upon option 1,* ~~R~~ *r*ecreate the historic alignment of Church Road: The two green spaces would be joined to form a public square whilst businesses at the western end of the high street would retain access to servicing and loading facilities. ST4 Cycling: Developers should support the creation of new east-west and north-south cycle routes across CEGA. High quality cycle parking and storage to be provided on the routes as well as within buildings. (Local Plan policy BT1*, Local Transport Note (LTN) and London* Cycling *Design Standards (*LCDS*))*

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F01	Not identified	**General**	Replace Citizens Advice. B+M Bargains caters to people on low incomes. Retain small scale retail.	Citizens Advice is an independent organisation. The Council has no influence in the activities provided or the location where they take place. We acknowledge the importance of B+M Bargains locally. However, the site is under private ownership. The masterplan SPD provides guidance on future developments and support existing businesses to stay local while redevelopment takes place but it cannot be prescriptive regarding which businesses should remain on site. The masterplan identifies a number of opportunities for new retail to take place supporting an active and thriving area.	No changes.
F02	Not identified	**Parking**	More consideration for parking for religious institutions. Parking for elderly and disabled.	Reducing traffic congestion and CO2 emissions is a key priority. So new developments within the CEGA are proposed to be car-free or car-lite, supported by provision for share mobility which could include car clubs. 3% parking provision for disabled residents required, and need to demonstrate capacity for 10% total future provision - policy T6 Nevertheless, we understand the need for new development to provide parking to access communities facilities and for people with disabilities, to ensure we create an inclusive community and the plan will address that. Therefore the SPD will be amended with an additional objective TM4: Inclusive Parking.	Section 5.2 Traffic Management Development Principles: add *TM4 Inclusive parking: Disabled parking needs to be secured in new developments and to access community facilities. Please also refer to London Plan parking standards.*
F03	Not identified	**General** **Crime** **Affordable Workspaces**	Supportive of the plan. Supportive of the Challenges but asked for more recognition on the crime aspect. Supportive of the opportunities but asked for more affordable workspaces, spaces for crafts	We welcome the support. Crime is recognised and highlighted on page 24 of the draft masterplan SPD as one of the area's key challenges. Affordable workspaces are highlighted as a result of the early consultation activities and they have been incorporated	No change.

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			and arts, spaces that reflect the cultural ethnicity of the area. No betting shops.	throughout the plan, supporting planning police BE1, BE2 and BE3. Affordable workspaces secured via S106 agreements are required to comply with management plans. These can help ensure the spaces are supporting the local ethnicity and needs of the area.	
F04	Resident 5	**Green Spaces** **Design Quality** **Safety**	Not enough green spaces, buildings are too tall, not enough affordable housing. Representation enquiry whether there are enough lighting/windows new developments and how many jobs will be delivered. Safety is a big issue near Neasden and Dollis Hill station.	The masterplan SPD seeks to strike a balance between green spaces and building heights. CEGA is within an open space deficiency area and so provision of green spaces are one of the area's top priorities. Nevertheless, in order to provide the needed green space provision, enough development is needed to help fund the spaces. Building heights are within the limit as the area sits outside Brent's Building Strategy. Affordable housing follows London Plan guidance with a strategic target of 50% and minimum target of 35% affordable housing. All new developments need to comply with Brent's Design Guide SPD and ensure a good level of daylight, sunlight and outlook across all windows. The masterplan SPD indicates improvements within the route connecting Dollis Hill Station to Dudden Hill Lane.P40.	No change.
F05	Not identified	**Crime and Safety** **Infrastructure** **Safety** **CNWL** **Supermarket** **Libraries**	Supportive of the vision, values and objectives. Supportive of the Challenges but asked for more emphasis on crime and safety and community cohesion. Have raised queries about the infrastructure: can it cope? Comment emphasized parking issues and questioned the relationship between parking, cycling. It also queried what is the infrastructure for electric cars. Street lighting by Dollis Hill is a priority for safety reasons. Requested an update on the CNWL situation.	We welcome the support. Crime and community cohesion are both recognised and highlighted in the masterplan SPD as one of the area's key challenges. The proposed plan was developed to help tackle that by supporting developments that bring positive contributions to the area, such as green spaces, active frontages and new businesses and job opportunities. A number of improvements are planned for the area to ensure the infrastructure can cope with the growing population. This includes improvements to existing streets, increased provision of cycle infrastructure, new green and community spaces. The masterplan SPD indicates improvements within the route connecting Dollis Hill Station to Dudden Hill Lane.P40.	No changes.

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			Question about what is being offered for entertainment? Highlighted the need for a supermarket. Libraries should be used more for learning and educational purposes.	The Council is working with the College and their partners with a view to redeveloping the existing campuses predominantly for residential whilst a new campus is built at Wembley Park. All these sites are subject to site allocations in the Local Plan, whilst the Dollis Hill campus is addressed in the Neasden Stations Growth Area SPD. The SPD area is located between Church End and Willesden Green town centres, and in proximity to Neasden and Harlesden town centres. Entertainment type uses are to be directed towards town centres in the first instance. This will support their on-going vitality and vibrance. If such uses are spread too thinly throughout an area, then they generally lack viability. As such the SPD prioritises the provision of new jobs and homes, community space and open space, as opposed to entertainment type uses which already exist in town centre areas. The masterplan SPD acknowledges locations for music development, building on the existing local background. By doing this we plan to create an environment where creativity and entertainment can be developed locally. The masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed. There are no libraries located within the CEGA boundary. The closest is located by Willesden Green.	
F06	Resident 6	**Cleanliness**	Requested challenges to emphasise cleanliness and on-going spitting issues.	This is accepted and the masterplan SPD challenges will add reference to the appearance of the area.	*Add text* Section 3.2 Challenges: *3.2.8 Overall state of the area: Church End has suffered from lack of investment for decades. Cleanliness is a recurrent issue of the area*.

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F07	Resident 7	**High Streets and Active Frontages**	Supportive of the proposed plan. Raised questions about how the Council is planning to support active frontages and local highstreets to be more inclusive and diverse.	We welcome the support. In all site allocations, design principles support developments with active frontages which overlook public spaces to ensure we can maximise the area's safety. Although the composition of the town centres uses/occupiers are largely outside of the Council's control, we can ensure that proposals for new retail floorspace are inclusive and accessible in design terms, allowing for disabled access. We do however try and limit the quantity of potentially harmful uses, such as take-aways, betting shops, amusement centres, and payday loan shops which will allow for other, more desirable uses to proliferate.	No change.
F08	Resident 8	**Anti-social Behaviour** **Community Centres**	Supportive of the plan. Asked to include as part of the challenges more emphasis on anti-social behaviour and drugs. Questioned where the community centres and activities for local people are. Comment also supportive of the improvements in Church Road and the Street Market.	We welcome the support. Crime and deprivation have been highlighted as part of section 3.2 Community Centres: The masterplan SPD details Site Allocation policy requirements for new development to provide three (3) new community spaces and re-provide one (1) new public house as follows: BSSA1 (Asiatic Carpets) - 1x community space recommended to be linked to the existing arts and film production, for training and employment for young people, approx. 900sqm. BSSA2 (B&M Home Store & Cobbold Industrial Estate) - 1x health facility - subject to local demand and agreement with the ICS- approx. 1,855m2 - 1x Brent Enterprise Hub: approx. 900sqm BSSA5 (Willesden Bus Depot) - 1x Public House re-provision. approx. 480sqm Activities for those spaces will be developed via further engagement with the community.	No change.
F09	Resident 9	**Housing** **Green spaces**	Supportive of the plan. Agreed with the challenges that are faced and believe it will help bring wealth to the area. Would like to see more housing and green areas.	We welcome the support. The masterplan SPD seeks to strike a balance between green spaces and building heights. CEGA is within an open space deficiency area and so provision of green spaces are one of the area's top priorities. Nevertheless, in order to provide the needed	No change.

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				green space provision, enough development is needed to help fund the spaces.	
F010	Resident 10	**Heritage**	Supportive of the plans but enquired the Heritage section. More emphasis could be given to this section. Different communities are/will be moving here, and it is important to keep history of the area alive.	The masterplan has a dedicated section discussing heritage within the area on p 57.58. Development Principle H1 Heritage identifies the need for prioritise restoration and retention of architectural features in case of redevelopment.	No change.
F011	Resident 11	**Spaces and Activities for Young People** **Cleaning** **Green Spaces**	Enquiry about infrastructure and activities for young people. Highlighted the need for cleaner roads and more green spaces.	Engagement with young people has helped to inform the infrastructure proposed for the area. This process identified and highlighted the need for investing in space training and providing opportunities for young people. The masterplan SPD indicates development options for key sites in Church End. To accommodate the feedback received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment. Finally, on Section 7.1. Community Involvement it is stated that developers should seek to co-design new developments with young people.	No change.
F012	Resident 12	**Re-using Buildings**	Supportive of the plan. Enquired about the approach for re-using existing buildings rather than building new ones.	The masterplan SPD aims to support the delivery of a characterful place that celebrates local landmarks and heritage. A dedicated section under Building Design and Architecture can be found on section 5.4 providing an overview of the area's current heritage features.	No change.

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				Development Principle H1 Heritage states that we seek to restore and retain architectural features of merit and to seek influence from the positive aspects of existing heritage assets. A map of the existing heritage assets is stated on Figure 52. Heritage features within development sites have been considered for retention. However, some heritage features within site allocations couldn't be retained due to pre-identified issues i.e. asbestos.	
F013	Resident 13	**Safety** **Housing** **Green Spaces**	Supportive of the plan. Highlighted the need for having spaces for walking as well allowing to cross roads safely. Requested more housing and green spaces.	We welcome the support. Crossings: On section 5.2 Movement and Connectivity, a number of proposed interventions are demonstrated on figure 30. There are 11 interventions proposed that focus on improving and creating crossings to ensure the area safer to walk. Housing: The masterplan SPD supports the delivery of at least 1,300 new high-quality homes co-located with industrial uses, by meeting or exceeding the identified site specific indicative residential capacity set out in Figure 11. Green Spaces: The masterplan SPD details Site Allocation policy requirements for new development to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m2 of additional green space as follows: BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				The masterplan SPD also identifies the need for improvements to existing open spaces.	
F014	Resident 14	**Play**	Supportive of the plan. Enquired about play spaces provision.	Figure 45 provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play. On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34.	No change.
F015	Resident 15	**Community Spaces** **Spaces for Young People** **Green Spaces**	Supportive of the plan as long as it is environmentally sustainable. Highlighted the lack of sports/community spaces, spaces for youth. Asked for more opportunity for youth, more facilities for young people youth clubs. Supportive that green spaces are being created.	A dedicated section for Climate Change and Sustainability (Section 5.5) reinforces the Council's commitment to ensure new developments can comply with the highest sustainability standards. The section includes further and detailed development principles on Resilient, Efficient and Healthy developments, Air quality and Pollution, Agent of Change and Contamination, Waste, Flooding and Water Management.	No change.
F016	Resident 16	**General**	Supportive of the plan. No further comments.	We welcome the support.	No change.
F017	Resident 17	**Re-using buildings** **Parking**	Supportive of the plan. Suggested more consideration for older buildings in this area. Enquired about how the Council will be managing parking.	We welcome the support. The masterplan SPD aims to support the delivery of a characterful place that celebrates local landmarks and heritage. A dedicated section under Building Design and Architecture can be found on section 5.4 providing an overview of the area's current heritage features. Development Principle H1 Heritage states that we seek to restore and retain architectural features of merit and to seek influence from the positive aspects of existing heritage assets. A map of the existing heritage assets is stated on Figure 52.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				Heritage features within development sites have been considered for retention. However, some heritage features within site allocations couldn't be retained due to pre-identified issues i.e. asbestos. Parking standards for developments will follow the standards set out in the London Plan. On street parking provision will need to support relevant mayoral and Brent policy including Long Term Transport Strategy, Air Quality Management Plan and Climate &Ecological Emergency Strategy and associated guidance. Management of on-street parking will be undertaken according to Brent's Parking Policy.	
F018	Resident 18	**Housing** **Green Spaces** **Cultural and Community Spaces**	Commented that the plan seems to have more housing than community and green spaces. Highlighted the lack of cultural and community spaces as well as music venues. Asked for the proposed changes to support the cultural makeup of Willesden and Harlesden.	Housing: The masterplan SPD supports the delivery of at least 1,300 new high quality homes co-located with industrial uses, by meeting or exceeding the identified site specific indicative residential capacity set out in Figure 11. Green Spaces: The masterplan SPD details Site Allocation policy requirements for new development to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m2 of additional green space as follows: BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm The masterplan SPD also identifies the need for improvements to existing open spaces.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				Cultural and Community Spaces: The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment. Apart from that, the masterplan SPD details Site Allocation policy requirements for new development to provide: BSSA2 (B&M Home Store & Cobbold Industrial Estate) - 1x health facility - subject to local demand and agreement with the ICS - approx. 1,855m2 - 1x Brent Enterprise Hub: approx. 900sqm BSSA5 (Willesden Bus Depot) - 1x Public House re-provision. approx. 480sqm	
F019	Resident 19	**Play Spaces** **Community Events**	Supportive of the plan. Asked for more spaces for children and community events.	We welcome the support. Figure 45 provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play. On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				The masterplan SPD a number of new open spaces, which are also demonstrated on figure 34. However, it is not within the masterplan SPD's scope to plan or deliver community events.	
F020	Resident 20	**General**	Supportive of the plan.	We welcome the support.	No change.
F021	Resident 21	**General**	Supportive of the plan.	We welcome the support.	No change.
F022	Resident 22	**General**	Supportive of the plan.	We welcome the support.	No change.
F023	Resident 23	**General**	Supportive of the plan.	We welcome the support.	No change.
F024	Resident 24	**Cleaning** **Young People Support**	Supportive of the plan. Asked for cleaner streets and more training opportunities for young people.	We welcome the support. The masterplan SPD development principles have been developed to ensure the higher standards of public realm are delivered throughout CEGA. Development principle OGS4 outlines maintenance plans for long-term management and maintenance to ensure spaces are well-used and remain high quality over time. Developers should engage the community in the design of spaces to promote a sense of ownership, respect and responsibility. (Local Plan policy BGI1). However, cleaning regimes for the area are beyond the remit of this SPD. The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34.	
F025	Resident 25	**General**	Supportive of the plan.	We welcome the support.	No change.
F026	Resident 26	**General**	Supportive of the plan.	We welcome the support.	No change.
F027	Resident 27	**General**	Supportive of the plan.	We welcome the support.	No change.
F028	Resident 28	**General**	Supportive of the plan.	We welcome the support.	No change.
F029	Resident 29	**New Homes** **Cleanliness** **Greening** **Supermarket**	Supportive of the plan. Asked for new homes to benefit local people first. Also highlighted more bins, cleaning, less street noise, more trees and play facilities. Supermarket is needed.	We welcome the support. The masterplan SPD supports the need for housing by supporting the delivery of 1300 new homes. The target is for a minimum of 35%, and when viable 50%, of new homes to be new affordable homes. New green and play provision are highlighted on p. 40. Development principle OGS4 outlines maintenance plans for long-term management and maintenance to ensure spaces are well-used and remain high quality over time. Developers should engage the community in the design of spaces to promote a sense of ownership, respect and responsibility. (Local Plan policy BGI1). However, cleaning regimes for the area are beyond the remit of this SPD. The masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
F030	Resident 30	**General**	Supportive of the plan.	We welcome the support.	No change.
F031	Resident 31	**General**	Supportive of the plan.	We welcome the support.	No change.
F032	Resident 32	**Employment** **Activities for Children**	Supportive of the plan. Asked for more employment, children's activities.	We welcome the support. Brent Local Plan policy is to deliver economic growth and employment opportunities for all. Church End contains Locally Significant Industrial Sites (LSIS) and Local Employment Sites (LES) designated to intensify industrial uses through co-location with residential uses. Redevelopment will be expected to improve the quality of industrial stock in the area, with the provision of modern light industrial facilities. The draft CEGA Masterplan SPD shows how all Site Allocations can increase the amount of employment floorspace, except BSSA1 (Asiatic Carpets) where the LES part of the Site Allocation designated for mixed use redevelopment since 2010 retains industrial floorspace, but at a lower amount. The masterplan SPD development principles have been developed to ensure the higher standards of public realm are delivered throughout CEGA and new play facilities are highlighted on p.40.	No change.
F033	Resident 33	**Health and Wellbeing** **Public Toilets**	Emphasised the need for supporting local people health and wellbeing. Public toilets are needed. Issues with safety, drugs, waste management, bad smell need to be addressed.	The North West London Integrated Care System (ICS) was consulted in the development of the draft CEGA Masterplan SPD. The ICS stated by May 2021 that there is no current predicted need for an additional health hub/facility within the CEGA boundary. Still, the masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m2) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years. The masterplan SPD vision's is to create a an attractive, prosperous and resilient neighbourhood that values and respects existing communities, whilst proactively planning for and welcoming a growing population and future business and employment needs.	No change.

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				Development proposals have been developed to ensure the area is well lit, overlooked, safe and with high quality places for local people. Community Spaces across CEGA will provide an opportunity for providing accessible public for the community.	
F034	Resident 34	**Waste**	Rubbish and cleaning need to be addressed.	The masterplan SPD provides the framework for creating an attractive and welcoming neighbourhood. Specific issues with rubbish and cleaning fall outside the Masterplan SPD's scope. Comments on the area's cleanliness have been shared with the cleansing services part of the Council.	No change.
F035	Resident 35	**Quality of the Environment** **High Street Uses** **Housing Tenure**	Church Road has gone down in the past 25 years. Uses not benefiting the community are compromising the area's quality. The area is dirty and needs improvement. Brent Council needs to have more control on the high street uses approved, too much of the same: betting shops, food etc. There area has no family homes, and many houses are being tuned into HMOs which compromises the infrastructure.	The masterplan SPD supports the delivery of an attractive, prosperous and resilient neighbourhood that values and respects existing communities, whilst proactively planning for and welcoming a growing population and future business and employment needs. This holistic plan seeks to attract investment and the revival of the Church End area. The existing high street offer contributes to the sense of belonging of many communities, but it could also better meet wider local need. The masterplan SPD suggests that spaces for young people art and local enterprise are encouraged as part of high street redevelopment. The Council seeks to guard against the over-proliferation of potential harmful uses such as betting shops, and takeaways. This is managed through policy BE5 of the local plan and considers their representation within the centre as a whole, and their location in relation to existing similar uses, and schools among other things. It is not necessary to include this explicitly within the SPD itself.	No change.
F036	Resident 36	**Community Cohesion** **Green Spaces** **Safety and ASB**	Comment would like to see Church End with a nice community with more green spaces. Drug issues can make the area unsafe.	Figure 45 provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
		Activities for Children and the Community	Ask for more activities for children and the community.	On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34. The masterplan SPD a number of new open spaces, which are also demonstrated on figure 34. However it is not within the masterplan SPD's scope to plan or deliver community events. Development principle OGS3 Safety states that new developments will create safe spaces and secure access by designing out crime, and by providing well-lit and overlooked spaces, adjacent uses that provide activation. (Local Plan policy BGI1) On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34. The masterplan SPD a number of new play spaces, which are also demonstrated on figure 34.	
F037	Resident 37	**Health and Wellbeing**	Supportive of the plan. Health and wellbeing are priorities.	We welcome the support. The North West London Integrated Care System (ICS) was consulted as officers developed the draft CEGA Masterplan SPD. The ICS stated by May 2021 that current predictions indicate there is no need for an additional health hub/facility within the CEGA boundary. Still, the masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m2) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years. The masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m2) should local needs and demand change, and subject to agreement with the	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				ICS. A review of local health needs with the ICS is expected to take place every 5 years.	
F038	Resident 38	**Play Spaces**	Supportive of the plan. Asked for more play areas for children and more events for the community.	We welcome the review. On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34. The masterplan SPD a number of new play spaces, which are also demonstrated on figure 34.	No change.
F039	Resident 39	**General**	Supportive of the plan.	We welcome the support.	No change.
F040	Resident 40	**General**	Supportive of the plan.	We welcome the support.	No change.
F041	Resident 41	**Schools**	Supportive of the plan. Highlighted the need for more schools.	We welcome the support. Schools: Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates that Brent will continue to have a high number of spare places across the primary system at a borough level. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction in Neasden Lane.Further details on Brent's School Place Planning Strategy.	No change.
F042	Resident 42	**Spaces and Support for Young People**	Supportive of the plan. Highlighted the need for having more spaces dedicated to support young people.	We welcome the support. The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following:	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.	
F043	Resident 43	**Housing** **Shopping Offer**	Supportive of the plan. Highlighted the need for more homes and better-quality shops as well as a supermarket.	We welcome the support. By 2041 CEGA will deliver at least 1,300 new homes co-located alongside new and refurbished industrial premises. The masterplan will facilitate the delivery of high-quality homes, more business opportunities and jobs, all supported by new infrastructure. Business growth will develop the area's emerging sectors, which includes film and music production, and support the transition to a net zero carbon circular economy. Where retail floorspace is provided it will be of a high quality meeting modern standards. Outside of controlling the appropriate uses of the shops, the Council does not have any control over which private business occupies the new units.	No change.
F044	Resident 44	**Housing** **Homelessness**	Highlighted the need for new council homes to help address homelessness challenges.	The masterplan SPD supports the need for housing by supporting the delivery of 1300 new homes. The target is for a minimum of 35%, and when viable 50%, of new homes to be new affordable homes.	No change.
F045	Resident 45	**General**	Supportive of the plan.	We welcome the support.	No change.
F046	Liberty to British People	**Shopping Offer**	The area is not a good place to live and shop. There is a need for a quality shopping area and better food offer.	Noted. The masterplan includes within its boundary Church End town centre, and is adjacent to the nearby centres of Neasden and Willesden Green. The SPD seeks to provide conditions which will help to improve these town centres, but does not seek to replace them. This will be through increasing the number of local residents, helping to increase footfall in the existing centres, as well as bringing investment to the area to improve the public	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				realm which will make the centres a more enticing place to spend time and shop, in turn increasing the vitality and viability of the local centres.	
F047	Resident 46	**General**	Supportive of the plan.	We welcome the support.	No change.
F048	Resident 47	**Waste**	Rubbish collection needs improvement and green streets need to be prioritised.	Waste collection: Development principle W3 Storage indicates that new developments need to adhere to a Site Waste Management Plan and Operation Waste Management Plan. (London Plan policy D6 and SI7). This ensures that on-site waste is effectively managed. Development Plan policies also require that both construction and household waste is reduced. The Council, through partnership with neighbouring boroughs, has produced the West London Waste Plan. This seeks to ensure the future capacity of waste sites is sufficient to meet future demand given population growth and changing trends. This includes the safeguard of existing waste sites, and their increased capacity. This is in an effort to ensure that London is self-sufficient, and can meet all of its waste needs in accordance with London Plan policy SI8. The masterplan SPD does not have any influence on current waste collection processes.	No change.
F049	Resident 48	**General**	Supportive of the plan.	We welcome the support.	No change.
F050	Resident 49	**General**	Supportive of the plan.	We welcome the support.	No change.
F051	Resident 50	**Safety**	Highlighted the need for more police patrols on Church Road after 6pm and the need for more local shops and green groceries as well as safer open spaces.	Comment noted. Whilst the SPD seeks to improve the area in terms of safety, crime prevention, fly-tipping and public realm improvements, by setting out principles that will help to better the area, it alone cannot resolve cleanliness and social behavioural issues. London Plan policy D11, in addition to other design-related policies, seeks to design out crime. This includes reference to the Secured by Design scheme published by the police. This includes design measures which reduce the likelihood of crime, such as ensuring passive surveillance and street lighting which help guard against anti-social behaviour.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				To bring extra consideration to the topics mentioned, further text will be added. Please see E05-3.	
F052	Resident 51	**Support for Young People**	Supportive of the plan. Highlighted the need for facilities to support young people.	We welcome the support. The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.	No change.
F053	Resident 52	**General**	Supportive of the plan.	We welcome the support.	No change.
F054	Resident 53	**Supermarket**	Supportive of the plan. Supportive of the local market.	We welcome the support. Where retail floorspace is provided it will be of a high quality meeting modern standards. Outside of controlling the appropriate uses of the shops, the Council does not have any control over which private business occupies the new units.	No change.
F055	Resident 54	**Schools** **Play and Activities for Children and Adults**	Supportive of the plan. Indicated need for high schools, parks, facilities for young children, sports for adult and children.	We welcome the support. Brent Council has a statutory duty to ensure there are sufficient school places for Brent children. Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates Brent will continue to have a high number of spare places across the primary system at a borough level. CEGA is located within Primary Planning Area 4 which is forecast to have high levels of spare places to 2027. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				groups. North Brent Secondary School is under construction on Local Plan CEGA Site Allocation BSSA19 Chancel House, Neasden Lane, which will provide 900 secondary schools places when completed in 2023. Growth Areas, including CEGA, where there are a number of new housing developments are kept under close review. Further details on Brent's School Place Planning Strategy are available here: https://democracy.brent.gov.uk/documents/s127138/12a.%20Appendix%201%20-%20School%20Place%20Planning%20Strategy%20Refresh.pdf The masterplan SPD details Site Allocation policy requirements for new development to provide six (6) new green spaces, plus, two (2) pocket parks, totalling approximately 9,500m2 of additional green space as follows: BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm The masterplan SPD also identifies the need for improvements to existing open spaces. On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34. The masterplan SPD a number of new play spaces, which are also demonstrated on Figure 34.	

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F056	Resident 55	**Support for Young People** **Employment**	Supportive of the plan. Indicated need for jobs for young people, help for self-employed, help with jobs for adults and a community centre.	We welcome the support. The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment. Brent Local Plan policy is to deliver economic growth and employment opportunities for all. Church End contains Locally Significant Industrial Sites (LSIS) and Local Employment Sites (LES) designated to intensify industrial uses through co-location with residential uses. The draft CEGA Masterplan SPD articulates how redevelopment can deliver these principles, with the total amount of employment floorspace across the main Local Plan CEGA Site Allocations as follows: BSSA1 (Asiatic Carpets) (LES/LSIS): 17,673sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate) (LSIS): 16,727sqm BSSA3 (Church End Local Centre): 3,995sqm BSSA4 (Chapman's and Sapcote Estate) (LSIS): 23,343sqm BSSA5 (Willesden Bus Depot): 6,479sqm BSSA8 (McGovern's Yard): 1,760sqm Total: 69,978sqm Redevelopment will be expected to improve the quality of industrial stock in the area, with the provision of modern light industrial facilities. The draft CEGA Masterplan SPD shows how all Site Allocations can increase the amount of employment floorspace, except BSSA1 (Asiatic Carpets) where the LES part of	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				the Site Allocation designated for mixed use redevelopment since 2010 retains industrial floorspace, but at a lower amount.	
F057	Resident 56	**General**	Not supportive of the vision but supportive of the challenges and opportunities presented. Key issues indicated were: housing cost, drugs, unsafe environment, discrimination.	Comment noted. The masterplan SPD addresses in the vision the issues highlighted regarding safety, anti-social behaviour and discrimination. The masterplan SPD also states that affordability should be prioritised achieving when viable 50% of the units.	No change.
F058	Resident 57	**Play Spaces** **Green Spaces**	Supportive of the plan. Indicated the need for spaces for children to play, open green spaces and community facilities.	We welcome the support. The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment. The draft CEGA Masterplan SPD details Site Allocation policy requirements for new development to provide three (3) new community spaces and re-provide one (1) new public house as follows: BSSA1 (Asiatic Carpets) 1x community space recommended to be linked to the existing arts and film production, for training and employment for young people, approx. 900sqm. BSSA2 (B&M Home Store & Cobbold Industrial Estate) 1x health facility - subject to local demand and agreement with the ICS - approx. 1,855m2 1x Brent Enterprise Hub: approx. 900sqm	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				BSSA5 (Willesden Bus Depot) 1x Public House re-provision. approx. 480sqm	
F059	Resident 58	**Housing**	Supportive of the plan. Highlighted the need for more housing.	We welcome the support. The masterplan supports the need for housing by supporting the delivery of 1300 new homes.	No change.
F060	Resident 59	**General**	Supportive of the plan.	We welcome the support	No change.
F061	Resident 60	**Housing**	Supportive of the plan. Highlighted housing shortage as one of the challenges and the need for more a more diverse range of shops included a supermarket.	We welcome the support. The masterplan supports the need for housing by supporting the delivery of 1300 new homes. The target is for a minimum of 35%, and when viable 50%, of new homes to be new affordable homes. The masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed.	No change.
F062	Resident 61	**General**	Supportive of the plan. Considered challenging creating new green spaces in such constraint environment. One of the key challenges is that the area is a nucleon for drugs in the area. How will the plan tackle that? A priority is preservation of the Church Road market. Since the development of Hornby Court onwards has always been skipping the establishment of a secure and consistent home for the market. We have been informed of a huge school being built on Neasden Ln. We hope the surrounding	We welcome the support. The masterplan SPD details Site Allocation policy requirements for new development to provide six (6) new green spaces, plus, two (2) pocket parks, totalling approximately 9,500m2 of additional green space as follows: BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			roads will be able to cope with the influx of traffic. I have a very positive view of the future and I am confident no matter what Brent Council will be able to achieve or not.	Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm The masterplan SPD also identifies the need for improvements to existing open spaces. Consultation with the local community indicated support for the market to stay local while redevelopment takes place, and measures for it to happen had taken place. The new council scheme will provide a newly designed market square to support the local economy and the footfall in Church End local town centre. Brent Council has a statutory duty to ensure there are sufficient school places for Brent children. Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates Brent will continue to have a high number of spare places across the primary system at a borough level. CEGA is located within Primary Planning Area 4 which is forecast to have high levels of spare places to 2027. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction on Local Plan CEGA Site Allocation BSSA19 Chancel House, Neasden Lane, which will provide 900 secondary schools places when completed in 2023. Growth Areas, including CEGA, where there are a number of new housing developments are kept under close review. Further details on Brent's School Place Planning Strategy are available here: https://democracy.brent.gov.uk/documents/s127138/12a.%20Appendix%201%20-%20School%20Place%20Planning%20Strategy%20Refresh.pdf	
F063	RG – Member Conservative Party	**General**	Not supportive of the plan. Plan seems to be centred around housing. Unsupportive of taller buildings as these are undesirable to most families.	Comment noted. The masterplan SPD provides reprovision of the current employment floorspace as well as additional green and open spaces and housing to support local needs.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			Upskilling the local community that work on basic jobs needs immediate action. Church Road needs very urgent attention and local shopping needs to be prioritised. The Asiatic Carpet site could feature a range of small scale production units. Assessing needs and possibilities 10-15 years ahead is impossible and might make the plan irrelevant. On design, it is vital that the horrors of Wembley and the A5 corridor do not repeat.	The masterplan proposes mid-rise redevelopment to meet the identified need for housing within the borough in accordance with the London Plan and NPPF. The development is of a modest scale but achieves densities which are conducive to sustainable development and help ensure that people can meet their needs locally without the need to travel by car. Major developments require 20% of jobs to be secured locally, for both construction, and where they include non-residential floorspace, for the operational phase also. This includes financial contributions towards the Brent Works initiative which helps upskill local residents and get them back into meaningful employment such as local apprenticeships. This is in accordance with Local Plan policy BE1, and the Planning Obligations SPD. The proposal for BSSA1 Asiatic Carpets will focus on retaining existing businesses within the Cygnus Business Centre while intensifying floorspace and consolidating shared service yards and access points. It will also focus on providing community space linked to the existing arts and film production supporting training and employment for young people delivering a mixed use neighbourhood focussed around a film and media production hub (building upon the existing Neasden Studios), supported by affordable workspace, complementary light industrial, community spaces, open space and play space It is recommended the masterplan will be kept under review to ensure it keeps up with the demand and needs of the local population. Whilst there are always uncertainties, local authorities have a responsibility to plan for the needs of a growing population, and Brent's Local Plan does so on the basis of available evidence and data.	

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
HYS1	Peabody/Catalyst	**General**	Supportive of the plan. We own a significant number of homes along Church Road, and would welcome discussions to level up the area and deliver affordable homes. We are supportive of site allocations. We believe affordable housing should be maximised across all tenures. Peabody/Catalyst would welcome any opportunity to work with the council towards bringing forward new affordable homes and provide necessary upgrades to the area.	We welcome the support. The masterplan SPD provides as one of the appendices further design guidance on how future developments can be expected to take place within Church Road high street. The Council welcomes any suggestions or initiatives to work collaboratively to improve area's environment and to delivery genuine affordable homes.	No change.
HYS2	Resident 62	**Religion** **Workspaces** **Building Design**	Not supportive of the plan. There is no mention of the faith and how it can help with the challenges faced by the community. Highlighted the need for work and operating spaces for businesses. Suggested the choice of brickwork to continue with the already standing buildings. Does not consider there was enough focus on reviving the Christian faith within the area nor has there been any understanding of the challenge to win souls for Christ.	Comment noted. Church End has a rich cultural history, with a diverse community. All developments proposed aim to celebrate the area's heritage and the cultural diversity of its existing communities, whilst continuing to welcome new residents and businesses. The masterplan SPD should be inclusive of all types of religion, without prioritizations. The masterplan aims to ensure quality employment floorspace is reprovided in case of any site allocation's redevelopment, to ensure the local economy can continue to thrive. Section 5.4 Building Design and Architecture provides a number of high-quality design references as well as development principles to ensure the highest design quality is achieved through new developments.	No changes
HYS3	Resident 63	**Building Heights**	Not supportive of the plan.	Comment noted.	Propose change: Add additional page on Section 5.1 explaining the

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			Highlighted the environment lacks harmony and that buildings are far too tall.	The development proposal seeks to provide sufficient housing, green spaces and employment facilities to support local needs and demand. Due to the limited land availability within the borough, the demanding housing targets, and the cost of land, the Council must ensure that existing brownfield land is developed effectively through a design-led approach to ensure targets are met, and development is deliverable. The approach for developing building heights considered a gradual increase of storeys. Building heights just increase towards the middle of the site, attempting to limit their impact to the existing residential urban grain. Further text can be added to the SPD to describe the rationale used for the proposal.	approach for building heights and consideration with adjacent properties.
HYS4	Brent Cycling Campaign	**Safe Travel**	Supportive of the plan. Additional significant challenge of safe travel through the Church End area, which is dominated by fast, busy roads with poor or disconnected active travel options. There is clear need to safe cycle routes to the local tube stations which must be facilitated by a combination of on road protected cycle infrastructure (on Neasden Lane and High Road) and traffic reduction (on Dalymeyer Road, Chapter Road, and Colin Road). "Cycle Lanes" are insufficient, any infrastructure on main roads must be protected. Refer to response publish via https://www.brentcyclists.org.uk/2022/09/28/church-end-growth-area-master-plan/ and shared via email.	We welcome the support. Brent being committed to seeking progressive ways to improve provision, safety and amenity for active travel modes including cycle infrastructure in line with contemporary standards and guidance. Parts of CEGA fall within the Church End/Roundwood Green Neighbourhood area as part of which a number of traffic free and traffic reduced green routes for walking and cycling are proposed. Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30). The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.	Please see E019-1 / E019-5
	Resident 64	**Young People**	Agreed with challenges and opportunities presented. Asked for more environmental and youth services.	The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following:	No changes

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.	
HYS6	Resident 65	**Cycle Infrastructure**	There is a lack of cycling infrastructure, both pathways and parking.	Safe travel is a key component for a successful and thriving neighbourhood. Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30). The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.	No change.
HYS7	Resident 66	**Workspaces** **Infrastructure**	Highlighted the need for more non-residential land use. Too much traffic and people. Brent has a high population density that is stressing us all out. Need more space for small business, workshops, light industrial, NOT more houses and flats without the supporting infrastructure. The area is becoming impossible to live in.	The masterplan SPD was developed considering local needs for housing, green and open spaces, as well as employment spaces. Mixed use redevelopment provides both new housing and employment space to accommodate a growing population. A number of infrastructure improvements and interventions are planned to support growth, such as: - A new secondary school - New community facilities - A potential new health hub – if need identified by the ICS - Location for optimised employment floorspace - New and improved parks and open spaces - Roads and cycle lanes	No change.
HYS8	Resident 67	**General**	Supportive of the plan.	We welcome the support.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
HYS9	Resident 68	**General**	Supportive of the plan.	We welcome the support.	No change.
HYS10	Resident 69	**General**	Shop fronts need to be clean tidy and presentable, new retail shops needed h&m , river island, Nike can be outlets so it is cheaper, JD. Challenges are you can change the appearance but if you don't help and educate the community it will not be productive, English classes should be available free of charge, activities for young people boxing help get them off the streets, football could put a goals in there , coffee shops. Needs to be shops, the whole area is depressing and people throw litter on the street because there is no respect for the area. Ensure all shops have a minimum standard. More retail shops branded names are welcoming. Overall, presentation of the area needs to be improved. More bins, lighting so young people feel safe, store fronts need to be transformed, education is important, this can be through boxing, and other activities to keep children and young adults off the streets. Community worker patrolling at night so my young daughter feels safe when walking back from work. - more bins - better lighting - more plants and flowers - better shops and shop fronts more retails and branded companies - community boxing centre to keep kids and young adults off the streets.	Comment noted. The masterplan SPD promotes a number of local improvements to help Church End to become a thriving welcoming neighbourhood. The Council has a dedicated Town Centre Manager for Church End and a number of initiatives taking place to promote a safer and more attractive high street. All new shops will be of a high modern standard, although the Council cannot enforce these standards on existing shops where they are not proposing changes requiring planning permission. Neither can the council dictate which shops occupy new or existing retail floorspace. The SPD seeks to improve the public realm which in turn, and through local investment from developers, will help make the town centres more attractive to visitors and occupiers. The SPD aims to promote a clear a cohesive vision for the area supporting the community to work together towards a common goal. Proposed Framework on Section 5.2 provide details of the elements needed to provide a more quality and welcoming environment.	No change.
HYS11	Resident 70	**Young People**	I think it is imperative to offer young children in the area and young adults' activities to do after	We welcome the support.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
		Retail Offer **Quality of the Environment**	work / school, community boxing, dancing to keep them off the streets and productive Priory: shop fronts are falling apart there has to be a standard set , more clothing stores Zara, H&M, Next, boots, Superdrug, Starbucks these places will attract different crowds and help integrate people better Near Franklyn Road where I live, shops round corner are unsafe and dirty. remove and put clothing and chain shops that help attract diversity so we feel safe. Walking around most young girls do not feel safe, there should be better lights on streets, flowers, more trees and bins provide. Shop fronts are falling apart, dirty and look very bad. We want this area to attract a diverse range of people so everyone can mix and learn off one another. To help this area grow it is imperative that we provide housing not just for council but also private rentals and buyers. this will ensure a better mix. Littering and flytipping is a major concern, provide more bins. Children and young adults are lost in this area. Some are uneducated or do not have family support or can not afford to do activities are school/ work. Boxing clubs are an amazing way to bring young boys and girls off the streets, teach them discipline and show them people care and there is a better life out there. sometimes all these young people need is someone to look up to and guide them.	A number of initiatives focusing on young people are expected to take place in the area. As part of the masterplan SPD development we have: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment. Other than that, the masterplan indicates a number of locations for new shops as well as new open and green spaces and improvement to existing ones. The draft CEGA Masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed. The masterplan SPD was developed to ensure a safe and welcoming neighbourhood is delivered for the community. The Council will continue to engage with local police services to ensure the safety of the area is a top priority for all. The masterplan proposes mid-rise redevelopment to meet the identified need for housing within the borough in accordance with the London Plan and NPPF. The development is of a modest scale but achieves densities which are conducive to sustainable development and help ensure that people can meet their needs locally without the need to travel by car.	

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			Overall, more bins, flowers, better shops retail, coffee shops, Italian, bistros. More activities for young adults and children boxing community, dancing etc. payment needs to be improved hazard for elderly and disabled. Clean all graffiti off walls. Sainsburys or a Tesco. No high rise flats. Police patrol or community workers at night.		
HYS12	Resident 71	**Safety** **ASB** **Housing**	Bring back policing, get rid of the drugs, crime and gangs. They are so prolific, if we the residents know of drug dealing and taking happening so openly why dont the police? Because there are none, Zero about. Crime, drugs and hose breaking are rife. Street crime and muggings will increase as the area becomes more affluent, Policing must increase. Housing should be made a priority for those who work in Hospitals, Schools, Police and Fire services to ensure their longevity to the area. My partner works in a local school, all the kids know her and have respect for her, she can talk to them and help them. This is the thing communities are made of.	A number of initiatives are being developed to tackle crime and anti-social behaviour. The masterplan SPD provides a cohesive and clear framework for new developments. Investment in the area will support the creation of a safe and welcoming environment which is part of the vision outlined for the area. Housing that can accommodate key workers is accessible through either shared ownership for those on qualifying incomes, an increasing number of build for rent schemes that have to provide London Living Rent accommodation or the Council's I4B programmer of letting dwellings below market rents. Schemes that have a 100% focus on key workers have historically created issues for funders which now makes them reluctant to lend on these types of schemes. They are concerned about long rental voids where there is no interest in them from key workers and lets to alternative occupants are not easily possible.	No change.
HYS13	Resident 72	**Housing** **PTAL**	Supportive the plan. Preference for C3 residential, rather than other types e.g. PBSA or coliving. Recognise the aspiration for industrial alongside resi (beds and sheds) but feel there are few exemplars of this in London- will need very careful design here given the history of high car traffic for the existing industrial uses. Density and massing feel appropriate for local context. Shame that more of the bus depot can't	We welcome the support. Plan on Section 5..4 Building Design/Proposed Framework indicates C3 use across the CEGA. Examples of good precedents are provided to ensure high quality designs are delivered. Metroline owns the site and it is proposed for the Bus depot to remain in the locality as it stands due to its operational requirements. Minor redevelopment is proposed on the side facing the high street as a way to optimise Metroline's operations and to activate the high street for more local businesses.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			be utilised for new homes but presume operational needs prevent this. Would be interested to understand the PTAL ratings of the developments furthest from Dollis Hill, particularly as the new West London Orbital must be in doubt due to TFL's funding woes. Would have liked to see stronger aspirations for a new cycle network- Brent is very poorly provisioned already and the road maintenance is shocking. Any new cycle routes will need to be mindful of existing cycle connections outside of the CEGA- do you have transport studies showing where the primary directions of travel are to provide a focused scope? Is it to Wembley, tube stations, into central London?	Safe travel is a key component for a successful and thriving neighbourhood. Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30). The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists. Weekdays am/morning cycle movements from the south of the borough are generally predominately southbound, towards central London. The Council is working on a new Active Travel Implementation Plan which will serve as a review and update to both Brent's Cycling Strategy and Brent's Walking Strategy. This will also include a review of the borough's aims and objectives regarding improvements and expansions to the existing cycle infrastructure.	
HYS14	Metroline Travel	**BSSA5**	Regeneration is needed but will clearly affect businesses in the area. The bus garage is privately owned and employs circa 500 people, the operations/ engineering and management team need to be on the same site. We agree regeneration is required, but the bus garage function is both very important to the area and essential for local travel. operationally it is very difficult to make adjustments as it operates 24 hrs per day.	We acknowledge Metroline own the site and it is proposed for the Bus depot to remain in the locality as it stands. Minor redevelopment is proposed on the side facing the high street as a way to optimise Metroline's operations and to activate the high street for more local businesses. We understand the importance of the Bus Depot for the locality and we are keen to engage and work closely to develop proposals that support both the bus operations as well as local needs.	See above at E07-10.
HYS15	Resident 73	**General**	Supportive of the plan. The masterplan SPD identifies all deficiencies and has correct priorities. If even half of the plan is delivered in 10-15 years, it will be a major improvement to the area.	We welcome the support.	No change.
HYS16	Resident 74	**Site Allocations**	Supportive of the plan.	We welcome the support.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			I think you should reconsider where you intend to place Dudden Hill station. It would be better placed at the intersection of the Dudden Hill line and the Jubilee line. This could enable TfL to reposition Neasden station (or at the very least more easily create a walkable route) which would make this an interchange station between the Jubilee and Dudden Hill Overground lines. This would result in more people travelling through the area. The movement of Neasden station to the other side of Neasden Lane to interchange with the Dudden Hill line would also give you the opportunity to reposition Neasden Lane - if it was a straight road (running through the current industrial yards, instead of having a bend in it) it would run closer to the rail line connection loop - which would give you a larger parcel of land to the east (closer to Severn Way) - and this parcel of land would be much more appropriate for residential development: right next to an existing residential area, and away from a dirty and noisy rail line which also overlook an aggregates yard. Cycling provision is very important so I will be keenly watching how this is developed and implemented in these plans. There is a significant opportunity to make a positive difference if cycling infrastructure is included in the plans for the area - and it would have huge benefits beyond just this development area too - with forethought and good design your proposed cycling accommodations could link up with the Church Path cycle track and provide safe journeys and Quietways from Neasden through Church End to Harlesden, Kensal Green and Shepherd's Bush.	The location of the Proposed WLO Station will be a TfL's decision based on what works best for the infrastructure. Brent can provide steer and guidance, but the ultimate decision will be TfL. We will pass this suggestion to TfL. Cycling provision is key to promote active travel. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.	
HYS17	Resident 75	**Heritage**	There is insufficient consideration of the significant historic sites on the edge of the CEGA (ie the church) but there is a vital opportunity to	Comment noted. The Masterplan has a dedicated section discussing heritage within the area on p 56.57. Development	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			open up access to one of London's hidden historic sites with potentially huge significance for the growth of Church End (the church). I am broadly supportive of the regeneration plan, which is long overdue. There needs to be parallel investment in crime prevention, public safety, and civic pride.	Principle H1 Heritage identifies the need for prioritise restoration and retention of architectural features in case of redevelopment.	
HYS18	Resident 76	**Parking** **Building Heights**	Supportive of the plan. Did not agreed with the challenges. Key issue is parking availability. Church end should remain a green area. Enough tall buildings but not enough parking.	We welcome the support. Reducing travel by private car through car-free or car-lite development supported by provision for shared mobility including car clubs are part of development principle TM2 Car ownership and parking.	No change.
HYS19	Not identified	**Building Heights** **Green Spaces**	Not supportive of the plan. It is no good just building high tower flats etc, Green spaces are needed and good quality shops. The residents there are not rich and from ethnic minority groups. We need community assets also and places to do keep fit etc, Certainly no pubs or betting shops. Brent is not very good at doing things. They purchased the Picture Palace and it has very opened for the whole community. It is designated a black heritage place. Why do we need that? We need something with classes etc for all races and groups. Are you not being discriminating in calling it these and even racist?	Comment noted. The masterplan SPD proposes a balance of different elements that aim to support local needs. High quality housing, green and open spaces as well as improvements in roads and existing spaces are key for the community. Building an inclusive space is part of the values and objectives for the plans and development principles aim to achieve that as part of new developments. Public houses are considered to provide a community role. As a result, they are supported in town centre locations, and their loss is resisted. Betting offices are restricted in accordance with Local Plan policy BE5. The composition of the town centres uses/occupiers are largely outside of the Councils control, we can ensure that proposals for new retail floorspace are inclusive and accessible in design terms, allowing for disabled access. We do however try and limit the quantity of potentially harmful uses, such as take-aways, betting shops, amusement centres, and payday loan shops which will allow for other, more desirable uses to proliferate.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
HYS20	Not identified	**General**	Supportive of the plan.	We welcome the support.	No change.
HYS21	Not identified	**Cycle Infrastructure**	Supportive of the plan. Needs more thought about pedestrians and cyclists.	We welcome the support. Safe travel is a key component for a successful and thriving neighbourhood. Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30). The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.	No change.
HYS22	Not identified	**Housing**	Not supportive of the plan. Housing for people that have been in temporary accommodation for years	Comment noted. The masterplan supports the need for housing by supporting the delivery of 1300 new homes. A minimum of 35%, and when viable 50%, of new homes are to be affordable. This will assist in moving some people out of temporary accommodation. However, it is accepted that without significant wider investment in affordable housing supported by central government, that the ability to make significant headway in reducing the length of time of those in temporary accommodation will probably be limited compared to the rising list.	No change.
HYS23	Not identified	**General**	Supportive of the plan.	We welcome the support.	No change.
HYS24	Not identified	**Green Spaces** **Safety**	Supportive of the plan. Green space for children. Make the area safer for children and young people.	We welcome the support. The masterplan SPD details Site Allocation policy requirements for new development to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m2 of additional green space as follows:	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm The masterplan SPD also identifies the need for improvements to existing open spaces. Figure 45 also provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play.	
HYS25	Not identified	**Green Spaces** **Building Density**	Supportive of the plan. I think a couple less buildings and a big green space in their place would make the area much better. There's a lack of a big green space to balance all the contamination that so many new flats will generate over the next decades considering their energy consumption. There could be more green spaces.	We welcome the support. The proposed developments aim to support local needs for housing as well as for open and green spaces. The masterplan SPD details Site Allocation policy requirements for new development to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m2 of additional green space as follows: BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm The masterplan SPD also identifies the need for improvements to existing open spaces.	
HYS26	Not identified	**Health Infrastructure** **Safe Travel** **ASB** **Housing Tenure** **Play Spaces** **Safety**	Supportive of the plan. I am concerned about the lack of health care being planned. I am also surprised by how often it says that there is no opportunity for green spaces and I think you need to be more creative. Green spaces need to be a priority at this end of the high road! Generally I think this could be good but we need shops and services as well as homes! This need to be thought about more	We welcome the support. The North West London Integrated Care System (ICS) was consulted as officers developed the draft CEGA Masterplan SPD. The ICS stated by May 2021 that based on current predicted needs there is no need for an additional health hub/facility within the CEGA boundary. Yet, the masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m2) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years. . The masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m2) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years. The masterplan SPD details Site Allocation policy requirements for new development to provide six (6) new green spaces, plus, two (2) pocket parks, totalling approximately 9,500m2 of additional green space as follows: BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop	No change.

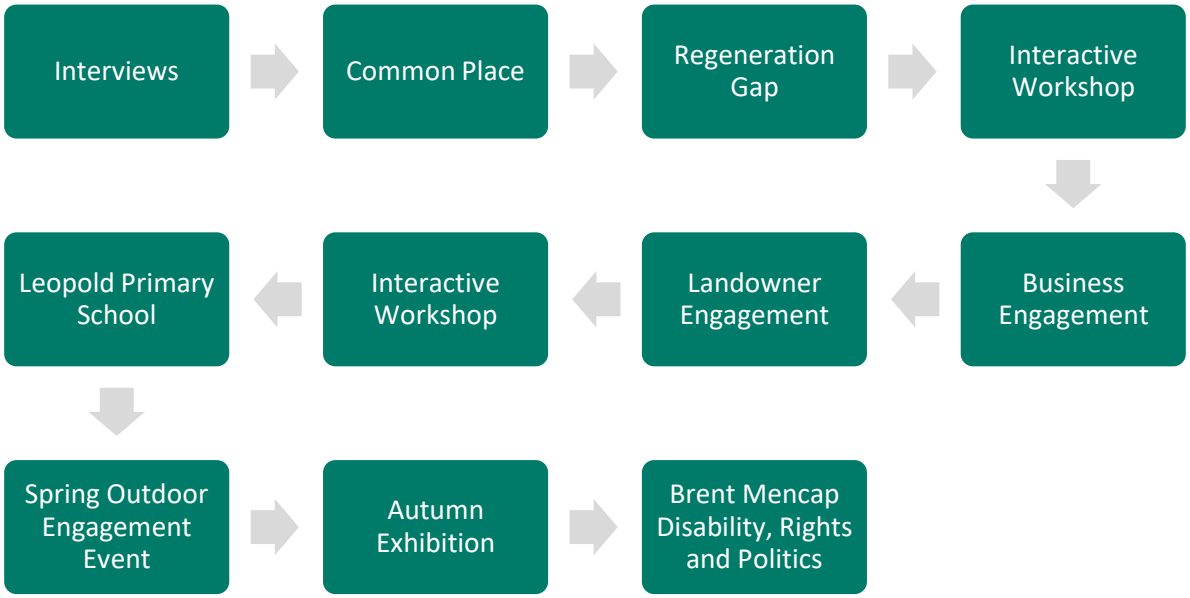
REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm The masterplan SPD also identifies the need for improvements to existing open spaces.	
HYS27	Not identified	**General**	Needs to be safer on the street. People. keep cycling fast and I and my child have been almost hit several times while walking on the pavement. Also people play really loud music all through the night. I think its important to consider all types of households including disabled people and people with children. I think its important the playgrounds are safe. It's not just building them because we already have parks and playgrounds, but they are all full of rubbish, broken glass and sometimes medicine bottles. I think we need safe places to go which don't have loud music. Nowadays it is hard to walk down the street without hearing very loud music and this is hard for someone in my family with sensory issues.	Safe travel is a key component for a successful and thriving neighbourhood. Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30). The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists. Development principle H6 Accessible and adaptable housing: states that new developments should provide at least 10% of dwellings to meet Building Regulations requirement M4(3) 'wheelchair accessible standard' and the remainder to meet M4(2) 'accessible and adaptable dwellings.' (London Plan policy D7). 25% of new homes as family-sized dwellings (3 bed+). The Council's environment team deal with issues associated with noise complaints. The SPD seeks to address the potential issues generated as a result of new development, such as the interaction between the industrial and residential uses. It cannot legislate for individual behaviour which can only be addressed through the Council's complaints system and other statutory enforcement regimes.	Further detail on the cycle infrastructure is being added to Section 5.2 Movement and Connectivity. Please see reps E07-11 onwards as well as paragraph 5.2 3 adding details on speed limits**.**
HYS28	Not identified	**General**	Supportive of the plan.	We welcome the support.	No changes.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
HYS29	Not identified	**General.**	Supportive of the plan. Did not agree with the challenges but did not provided comments with the reason.	We welcome the support.	No changes.
HYS30	Not identified	**Building Heights**	Not supportive of the plan. Very high buildings close to each other.	Comment noted. The development proposal seeks to provide sufficient housing, green spaces and employment facilities to support local needs and demand. The approach for developing building heights considered a gradual increase of storeys. Buildings adjacent to existing residential areas are no bigger than 3 storeys high. Building heights just increase towards the middle of the site, providing no impact to the existing residential urban grain. Further text can be added to describe the rationale used for the proposal.	No changes.
HYS31	Not identified	**Traffic Flow** **Cycle Infrastructure** **Safety**	Supportive of the plan. In order to make considerable improvements issue of traffic flow, specifically large commercial vehicles using residential streets as a cut through must be addressed. Alongside width restrictions, and timed road closures, proper bike lanes safe for family use need to be created. In addition, all pavement parking should be removed as it is unsafe and unjust for wheelchair users and buggy users to not have access to safe pavements. Currently the area is unsafe for women and young families to move freely in. The lack of proper transport, safe bike lanes, useable footpaths, and clean walkways is huge problem in the area. Fly tipping is also a major issue on all local roads. Whilst this report is very encouraging, changes to transport safety and pollution need to be made far more swiftly.	We welcome the support. Development principle OGS3 Safety states that new developments will create safe spaces and secure access by designing out crime, and by providing well-lit and overlooked spaces, adjacent uses that provide activation. (Local Plan policy BGI1) Safe travel is a key component for a successful and thriving neighbourhood. Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30). Removal of pavement parking is one of the considerations as part of the Green Neighbourhood proposals. Word addition to demonstrate clear commitment to avoid any further introduction of footway parking and phasing out of existing footway parking.	*Text added:* Movement and Connectivity/ Development Principles / TM2 Car ownership and parking: TM2 Car ownership and parking**:** Reduce travel by private car through car-free or car-lite development supported by provision for shared mobility including car clubs. Provision must be made for charging electric or Ultra Low Emission vehicles. (Local Plan policy BT2) *Footway parking should be avoided.*

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
HYS32	Not identified	**Street Greening** **Gentrification**	Supportive of the plan. Plant trees everywhere possible, plant hedges/climbers along edges of pavements on busy roads to cut down on traffics fumes for pedestrians, prioritise pedestrians over cars (at the moment cars get parking spaces on pavements! So glad this is happening, I hope it doesn't lead to massive gentrification.	We welcome the support. The potential for street trees is set out within the movement framework/ street typology. Additional trees will be provided in developments to address the need to attain the relevant urban greening factor scores for residential and commercial developments.	No change.
HYS33	Not identified	**General**	Supportive of the plan. Did not agree with the challenges but did not provided comments with the reason.	We welcome the support. Challenges were identified through a number of different engagement activities undertaken throughout the year of 2021.	No change.
HYS34	Not identified	**Infrastructure** **Allotments** **Links between sites** **Green Spaces Maintenance**	Supportive of the plan. Distances for disabled foot traffic from doctor/dentists/supermarket. There is an opportunity for allotments at Roundwood Park (see Kilburn) Ensure that the links between the sites are fully accessible on foot for all foot traffic; think about water sinks along hard paving; and the possibility of restoring water features/streams etc into the green spaces. Overall a good plan but often plans and actuality do not match. in particular green space maintenance responsibility is forgotten - see green walls on flats by West Hampstead Overground station. And the failure to provide the planned greening around Willesden Library when it proved expensive. Think about how very small areas can be greened by the community such as on roundabouts or edges of roads.	We welcome the support. Section 5.2 Proposed Framework indicates a number of improvements to ensure CEGA is accessible and green. We hope to work with developers to maximise opportunities for greening and accessibility within the area.	No change.

Pre-Statutory Consultation Events

Please see below a summary of the events undertaken between March 2021 – December 2021 that have informed the CEGA masterplan SPD designs:



Interviews

We conducted 13 interviews with local stakeholders and community groups to build a picture of the qualities of social infrastructure, including the relationships that make the town centre function as well as learning in greater detail how existing buildings and spaces are used. Leaders of existing community and faith groups participate of the meetings as means of tapping into existing social networks, alongside high street businesses and a major local provider of social housing. As the conversations occurred through a national lockdown, all were held online. We spoke to:

- voluntary community groups
- local charities
- local housing association, as well as HA-run community centre
- 2 faith groups
- local market
- 2 high street businesses
- management of Willesden Market

The findings of the meetings above were the following:

The Growth Area spans between multiple neighbourhoods: *"Kids from Church Road would not dare walk to Neasden Studios, as they will not feel safe"*. While the western end of the Growth Area relates strongly to Harlesden, the east is more strongly bound to Willesden. Connections between the two ends are poor and there are safety concerns associated with gang territories.

The Growth Area's high streets are still an important reference point and meeting place for local residents: While the retail environment on Church Road and High Road is challenging, with high numbers of vacant units, the Town Centre and its marketplace remain crucial spaces where many local residential communities come together and encounter one another. However, some 'communities don't feel welcome in the Town Centre.

There is limited 'neutral' community spaces: To the west, the Unity Centre, and the east, the Learie Constantine and the Dudden Hill Community Centres provide much-needed community spaces. The outdoor market is an important space where informal social encounters between residents can happen.

Existing community spaces are struggling to meet local needs. *"There are lots of good small things going, but there are bigger problems to address."* Local charities and voluntary groups report a lack of suitable spaces to meet and reach out to service users, while those who run community spaces find that some users struggle to access their spaces due to crime, antisocial behaviour, and poor pedestrian routes and lighting within the area.

Local people are stepping in to fill voids in social provision, and to link existing residents to public services. *"You can't just sit back and not do anything".* Many of the organisations we have spoken with were set up by local people in direct response to urgent community needs which they experienced first-hand. In several cases, organisations have emerged to bridge the gap between residents and other public services, and their embedment in the local community is central to their purpose.

Social infrastructure networks are still developing: *"Church End could become more connected to the rest of the borough and even the world."* Existing social infrastructure is linked by individuals, functional relationships and by necessity. Links between existing groups were actively fostered during planning for an outdoor festival in Church Road as part of Brent's Borough of Culture festivities, which could not go ahead at the time due to the pandemic. This seems to mark a point in the dialogue between faith and ethnic groups that is still in its early stages.

Working age and older residents of Church End are still getting to know one another: *"We live together, but not together"*. Church End's diversity is a source of local pride, but, while young people mix well within the area, social cohesion among older generations is reportedly low. Language barriers are a significant contributing factor, as is a high rate of resident turnover.

Existing green spaces and public spaces are under pressure: *"If you need a green space to go to with your child, there is nothing within walking distance."* In the absence of larger public spaces within the Growth Area, the green spaces around St. Mary's Church and the pavements in the Town Centre are important social and amenity spaces. However, the pavements in the Town Centre can feel narrow and compromised, while the green space can feel dark and unsafe at night. Other, larger green spaces and play facilities are not available within easy walking distance from the Growth Area.

The Growth Area urgently needs to provide more, and safer, opportunities for young people: *"These are kids that are from the area and we have watched grow up. We need to help them set their minds for a better future"*. The need to provide opportunities for youth, particularly around skills, training and employment, was voiced consistently across the interviews. To work well in Church End, a successful offer needs to meet young people where they area, be attractive, and offer consistency, agency and ownership to participants.

Residents feel that there are inadequate training and employment opportunities to support a growing population: Interviewees and consultees agree on the central importance of training and

employment opportunities to improving life for everyone in the Growth Area. The pandemic has brought increased awareness of poor mental health and general well-being in the Growth Area. While this is likely linked in part to overcrowded housing, and exacerbated through the pandemic by multi-generational households, anxiety and lost income through reduced employment, it can also be attributed to challenges in accessing services and getting accurate diagnoses.

Residents in the Growth Area are cautiously receptive to change: *"There are wounds that are yet to heal".* There is widespread disappointment in the failure of previous regeneration in the area to improve the lot of existing residents. There is a sense that the area is overdue for significant renewal, but also strong conviction that any future development must be accompanied by tangible improvements to the shared environment.

Common Place

The Common Place provides a user-friendly platform to engage and consult with communities and stakeholders, helping to maximise participation, broaden engagement demographics, build trust through transparency, and facilitate collaboration to inform better designs. By the end of March 2021 the platform had gathered:

- 754 visitors
- 453 contributions
- 97 respondents and
- 50 news subscribers

The majority of respondents were local residents (over 60%) and there was also a significant number of people who shop in the town centre (over 20%). Most respondents were aged between 25-54, with very few over 55 + overall, comments and agreements were mostly negative (65% and 85% respectively).

Overall, many themes from the interview series were echoed in contributions to the map. There is a general sense that residents are receptive and even eager for change and development in the area, provided that it brings improvements to social infrastructure, and an over-riding sense that intervention of some kind is required to support a neighbourhood in crisis.

Concerns regarding personal safety and the impact of crime, particularly on young people, were very frequently voiced, together with a number of comments pointing to low levels of social cohesion.

Responses added additional detailed observations on public realm, with many holding concerns around the dominance of motor traffic, poorly tended and maintained public realm along the High Road, Church Road, Neasden Lane and the marketplace. Some spirited debate was in evidence around the existing retail offer, and the general environment of the high street on Church Road. Although it provides a dwell space in an area, it is heavily compromised by traffic. Ships could appeal to wider residents to contribute to a wider sense of belonging.

Regeneration Gap

The Regeneration Gap was a video developed by United Borders where young people highlight their concerns for the future. The film titled, 'Regeneration Gap' featured both young people from Church End and some adults who had grown up in the area and witnessed it change. Together they

discussed how the area has changed, the current issues faced by local youth, the challenges and potential of regeneration and also the innate strengths of the local community:

"Give people more opportunities, give the kids more opportunity so that they can turn to somebody and look up to somebody..."

"There needs to be more social events to bring people together. Once people are together through social events, it builds a rapport and builds up a strong community that are willing to talk together."

"We've always been creative around here... Even before the lights and the cameras, the whole world wanted to know what Church Road was saying if you knew about us, you knew you wanted to hear what we had to say."

Interactive Workshops

To test and develop the social infrastructure of the area and gain an in-depth understanding of local skills, training and employment, we conducted two interactive online workshops with local stakeholders. The two workshops covered the topics of 'skills, training and employment' and 'social infrastructure'.

As the workshops occurred during a national lockdown, they were both held online. They were formatted as a digital presentation over Zoom, followed by group discussions within breakout rooms with interactive exercises on digital worksheets uploaded on Miro. The workshops included representatives from the local community, education & training specialists, workspace operators and Brent council, and the outcomes are set below:

Skills, Training and Employment

The area is in need of a new local 'hub' and potentially a well-known anchor tenant to attract new businesses to Church End. The growth of new businesses in the area would require new attractive public realm, green spaces and lunch time offerings to encourage people to want to work in the area. The area is in need of new large-scale supermarket that offers affordable, essential and everyday needs. Not only could this provide the community with a much-needed retail offering, but could also provide local employment opportunities.

The provision of affordable workspace is essential to encourage the growth of local creative and entrepreneurial industries. Prominent needs specific to Church End are requirements for training opportunities in media and film, as well as language skills. Establishing links between existing training organisations and non-English speaking communities is a persistent challenge. Training provision should be responsive, flexible, and cannot wait for the full masterplan period to respond to existing needs. It was suggested that training opportunities should be mobile and embedded within existing social infrastructure. There remains a challenge in encouraging Church End residents to be mobile and access opportunities.

The process of development should present training opportunities, both through apprenticeships in construction sector jobs and by incorporating 'meanwhile' developments in delivery phasing. 'Meanwhile' uses have the potential to respond quickly to shifting local needs. Training opportunities need to be delivered through the development process. This may be best achieved by bringing training opportunities into close proximity with communities, e.g. in town centre and high street locations, in and around existing community spaces, rather than on new sites.

Social Infrastructure

It is important that new spaces are community centric to allow people to comfortably come together and socialise as a community. The town centre was pinpointed as an ideal location.

Independent play was highlighted as important to local youth and the idea of passive supervision was discussed as a method of facilitating this. Nearby shops spilling into, and overlooking, these spaces could offer this. A community focus, use or even programme within these spaces could potentially achieve this too.

Ownership was raised as a very important consideration for any new public spaces in the area. Any new successful open space needs to imbue the community with a sense of ownership over it. Existing residents consider safety and security as essential characteristics for new public spaces. They should be comfortable, clean, well-kept and secure. The area is home to vulnerable people who are struggling with addiction and homelessness, and it is important that the masterplan does not turn its back on them. Youth should remain a key focus to the provision of new community spaces, however, the elderly and people with disabilities must be considered.

Trust, integrity, long-term commitment and local roots were identified as key prerequisites for the creation of successful community space. Music is of great importance to the cultural identity of Church End and has the potential to engage young people. There is a need to support the development of enterprise skills and opportunities for physical activity.

The vacant high street properties in the town centre, together with un- or underused first floor storerooms, potential sites for community space, together with ground floor spaces to new development on the market site. Due to their distance from existing residences, the industrial sites could play an important role in supporting music/film activity.

Spaces associated with faith groups (i.e. churches) have the potential to play an expanded community role.

Spring Outdoor Engagement Event

We conducted a public street-side consultation event at Willesden market on Wednesday 12th May 2021, in order to consult the public on the masterplan so far and also some preliminary design propositions. We presented 6 A1 consultation boards, titled: introduction, stakeholder engagement, movement and streets, employment and community uses, massing and open space and how it will work.

Overall +/- 45 people attended the event.

All of those who engaged in detailed conversation were positive and supportive of the aims of the Masterplan. However a number of key issues were reinforced as being essential, this included- affordability of housing and workspace, crime and anti-social behaviour, community ownership over open spaces, the need of retail and supermarket for all community groups and the local importance of Willesden market.

Affordable housing and workspace remained an important issue that was raised by many attendees. It is generally understood as being critical to future cohesion between the existing communities and new developments. “I hope that spatial change will bring along with it social change” “I hope that it (new development) won’t cause greater division”.

School Engagement

We attended Year 6 classes at both the Hawkshead and Gwenneth Rickus campuses, gave a presentation explaining the Church End Masterplan, the role of different professions within the regeneration process, and also introduced a 'homework task'.

The homework task was devised to help the Masterplan team to understand Church End through the eyes of younger children, as well as raising local awareness of the Masterplan among parents. Students were asked to draw their journey to school and then layer that journey with illustrations of Church End through their individual perspectives, desires and opinions.

Drawings received suggest that, even for younger people, the Town Centre shops are central to their understanding of Church End as a place. Trees and greenery feature prominently in their drawings, but they also note the presence of heavy vehicle traffic which they encounter on their way to school, and in one case make reference to anti-social behaviour and a lack of perceived safety.

Proposal elements of the students' drawings focus primarily on the provision of new open and play spaces, which appear adventurous in nature and supporting wildlife, but also cafés and small grocery shops. This may suggest that they perceive the social value of these amenities to their parents and see the need for multi-generational social spaces.

Landowner Engagement

We had dedicated meetings with the major landowners of the following sites: BSSA1, BSSA2, BSSA3, BSSA4 and BSSA5. Discussions were useful to understand the phasing and the timing for future redevelopment. Proposals in the masterplan were then developed so sites could come forward independently in different periods. Individual particularities about the sites were taking into consideration when developing the proposals to support its deliverability.

Businesses Survey – Industrial Sites

To develop a masterplan that can maximise opportunities for local and new businesses to grow and develop, Brent's Regeneration Team developed a Business Survey to reach out to those businesses based within the industrial sites. It aimed to understand the following:

- Character, size and operational requirements
- Growth expectations
- Positive and negative aspects about being located in Church End
- Opportunities for local improvement
- Suitability and affordability of the premises used

The Survey was shared via post to more than 300 businesses. The Council also shared this via email to more than 50 businesses currently within the masterplan stakeholder's list, including industrial and high street businesses. In parallel to that, the team also visited 20 businesses located within the CEGA Site Allocations, between 8th and 13th April 2021, where 12 surveys were completed in a short face-to-face interview. Two additional surveys were sent via email. Findings are set below:

- Businesses consider Church End good for its location and business network – some highlighted having complementary uses/retailers as a positive aspect. i.e. plumbers, construction material, kitchens, etc.
- Staff are based locally (staff and/or business owners).
- Consider Church End bad in terms of crime, asb, frequent road works, parking and logistics/access to their premises.
- Welcome of improvements in infrastructure (better linking East/West/North/South links , support to young people, more police and an anchor to bring more interest to the area.

Overall businesses are happy with their premises and consider it affordable (potentially because many were freeholders). The ones which are leaseholders don't seem to have issues in terms of flexibility for change – seem to have a good relationship with freeholders.

Autumn Exhibition

We conducted a second round of on-site events in Church End. The first one taking place at Willesden market on Wednesday 13th October and the second one on Saturday 16th October 2021, in order to consult the public on the 1st drafted designs. We presented 6 A1 consultation boards, titled: About the masterplan, our response to what you said, What future could look like, Proposed ground floor designs and Next steps.

Overall, +/- 67 people attended the event.

All of those who engaged in detailed conversation were again positive and supportive of the aims of the Masterplan. However, recurrent issues such as lack of affordable housing and workspace, crime and anti-social behaviour, remained key topics.

Brent Mencap Disability, Rights and Politics Group

Brent council attended one of the meetings of Brent Mencap's Disability, Rights and Politics Group. The dynamic involved presenting the work developed up until the date of the activity and asking the following questions:

- What do you like or dislike about Church End?
- What do you visit in the area beyond Brent Mencap?
- What do you think about the proposals and what do you think its missing?

The findings of this activity are set below:

- The sense of community: For many this is the only time in the week they can meet and socialise with other people
- Bus service is good
- The market seems interesting – but very few people still go there as the area is unsafe
- Crime and how drugs are managed locally support a feeling of unsafety
- Neasden Lane is very busy and doesn't feel safe to cross or walk nearby
- There are not enough green spaces and wayfinding can be challenging.
- Traveling to Church End is expensive for some who are not local to the area which stops them from visiting

The majority of people do not visit Church End itself apart from Brent Mencap due to its bad reputation:

- The group supports the proposal but would like to see more:
- More affordable housing
- More green spaces
- Better street lighting and signposting/wayfinding to identify roads
- More accessible crossings and separation of cyclists/pedestrian/cars
- An environment that looks cleaner and more inviting
- Places for people to meet and socialise
- More publicly accessible toilets

ANNEX A

BNP PARIBAS REAL ESTATE

CHURCH END GROWTH AREA DRAFT MASTERPLAN REVIEW OF REPRESENTATIONS IN RESPONSE TO CONSULTATION

Simply Planning on behalf of Kelaty Properties LLP (Asiatic Carpets)

a. The appraisal shows the BSSA1 allocation option 1 (which is that with no major retail scheme and which closest resembles the masterplan scheme) as having a £448,465 surplus with 35% affordable housing. The testing shows this drops to a £186 deficit at 36% affordable housing. As such, a 1% increase in affordable housing results in an approximate £450k reduction in the viability of the scheme. The Policies of the Local Plan and London Plan, require 50% affordable housing and this is reflected on page 70 of the draft CEGA SPD. Therefore, a policy compliant affordable housing scheme will result in an approximate £6.3m deficit;

As noted below, sales values and commercial values have increased at a faster rate than costs since the viability study was undertaken. Furthermore, the representation mischaracterises the Local Plan an London Plan policies, both of which make provision for a 'viability tested' route for schemes that cannot achieve the relevant policy targets. The London Plan does not apply the 50% target as a quota.

b. The appraisal is based on August 2021 base rate building costs, which have significantly increased since this time due to increased in energy and building material costs. In addition, these costs do not account for the developments being required to be carbon zero, which will add a further substantial cost;

Current policy does not require net zero carbon; London Plan policies require a 30% reduction below Part L 2021 which is reflected in the assessment. At present the costs of delivering net zero carbon are estimated at around 5% of construction costs, but this cost is likely to reduce over time as technologies adapt.

Build costs have increased since August 2021, but residential sales values and commercial rents have increased and yields have moved sharpened (even allowing for the post-September 2022 correction). Land Registry data for LB Brent indicates that sales values have increased from an average of £518,527 in August 2021 to £580,215 in October 2022 (11.9%). Over the same period, the BCIS Tender Price Index has increased from 339 (Qtr 2 2021) to 368 (Q1 2023), or 8.6%. As scheme GDV is a much higher relative to construction costs, the 11.9% increase in sales values has a much more significant impact on residual land value than the 8.6% increase in costs, resulting in a significant improvement in viability.

Clearly markets are cyclical and the Borough's Local Plan and the London Plan both make provision for a 'viability tested' route for schemes that cannot achieve the relevant affordable housing targets alongside other policy requirements. This will be tested (if necessary) when planning applications are submitted.

c. The two options assessed for the Asiatic Carpets site allocations do not reflect the schemes shown within the draft CEGA SPD;

The schemes in the CEGA SPD are indicative, as are those tested in the viability study. Detailed planning applications will need to be submitted in due course.

d. The benchmark land values vary between the two assessed options, whereas benchmark land values for the same sites should be consistent;

This is incorrect – the two options require different land areas and Option B assumes that 4,417 square metres of existing floorspace are retained and not required for development. This floor area will either be retained by the landowner, or sold to a third party for ongoing use.

e. The levels of affordable workspace are also not consistent with the massing and land use plans shown within the draft CEGA SPD; and

The viability assessment applies a level of workspace which is consistent with the Local Plan policy requirement.

f. The developer profit levels adopted in the options (these being 17% for private housing, 15% for commercial floor space and 6% for affordable housing) are unduly conservative for a complex development site such this, which includes multiple assets classes which would be largely speculative in nature and many potentially unknown development abnormals.

The levels of profit applied in the appraisal reflect the profit levels applied by developers on live planning applications submitted over the past 12 months (we assessed around 250 developments over that period, many of which were more complex than the subject site). We do not agree that the profit margins are conservative. When bidding for land, developers have frequently taken on a view on their profit margins and it is unlikely that those assuming higher profits would be selected as purchaser.

For the reasons outlined above, we consider that there will be a financial viability issue when our client progresses their site to planning application stage. Policy BE3 of the Local Plan requires the development of our client's land to achieve the retention of the maximum viable levels of industrial floor space. The affordable housing policies of the Local Plan and London Plan require the provision of 50% of affordable housing to be acceptable. Therefore, if this is to be achieved, using the viability evidence which underpins the draft CEGA SPD, it will require a significant reduction in industrial floor space, as the maximum viable provision will be significantly depressed by the need to address the shortfall between the tested 35% affordable housing against the Policy requirement of 50%.

As noted above, any financial viability issues will need to be tested at the planning application stage and a detailed assessment submitted with the planning application. This will then need to be independently tested on the Council's behalf and the conclusion of this assessment will inform the need for any amendment to affordable housing provision.

The London Plan and Local Plan only require 50% affordable housing for sites to qualify for the 'fast track' route; policies are expressly drafted so that sites that cannot meet this target are not sterilised. The 'viability tested' route in the London Plan (reflected also by the Local Plan) make provision for a reduced level of affordable housing on the basis of a proven viability case.

NDB and MNM representation (29-31 Cygnus Business Centre)

No specific comments on viability, although the representations alludes to concerns regarding the balance to be stuck between different policy objectives. If a scheme that is submitted for planning is unable to viably deliver all the policy objectives in the plan, the application can be progressed through the London Plan 'viability tested' route (also reflected in the Local Plan). Any assertions regarding scheme viability will need to be tested and supported by a financial viability assessment submitted with the planning application. This will need to be independently reviewed on the Council's behalf to identify the maximum viable level of policy outputs.

BNP Paribas Real Estate

6 February 2023


Brent