

**INDEPENDENT EXAMINATION OF THE KILBURN  
NEIGHBOURHOOD DEVELOPMENT PLAN 2022-2033**

DEREK STEBBING BA (Hons) DipEP MRTPI

EXAMINER

Examination Ref: 01/DAS/KNP

15 August 2025

Dear Mr Stebbing,

**KILBURN NEIGHBOURHOOD DEVELOPMENT PLAN EXAMINATION**

Thank you for your letter of the 28 July 2025 of your examination procedural matters. We note that you are going to do an unaccompanied site visit and also note that you consider the examination can be completed solely with written representations.

Our response to the three questions addressed to the qualifying body are listed below.  
(Please note that the answers to question 2 and 3 have been discussed with the respective council officers who have assisted us with essential information).

**Question 1: Re. Kingsgate Place, Kilburn, NW6**

A Representation (Ref. Rep. No. 10) has been submitted expressing concerns regarding the environmental conditions (relating to traffic volumes, air quality and noise) for residents living in Kingsgate Place.

KNPFs answer:

Kingsgate Place has not been raised specifically at any time during the preparation of the plan. The qualifying body would find it advantageous to include Kingsgate Place as an “area of intervention” and amend the plan accordingly.

**Question 2: Re. Appendix 2 – Kilburn’s Local Heritage (Pages 45 and 46)**

A Representation (Ref. Rep. No. 25) has been submitted setting out a number of omissions from the list of Locally Listed Buildings in Appendix 2, and an error concerning the Listing details of Paddington Old Cemetery.

KNPFs response:

We are pleased to receive this comment to complete the list of locally listed buildings. Please see the *attached* proposed amendments to appendix 2.

Regarding an error concerning the Listing details of Paddington Old Cemetery, we are seeking further information from the Friends of Paddington Old Cemetery.

The same Representation also sets out some possible errors, inconsistencies and omissions concerning the Open Green Spaces Map (Figure 5).

KNPFs response:

We are reviewing the information contained in the map concerning Open Green Spaces (Fig 5) to make the information as accurate as possible.

**Question 3: Re. Kilburn Flood Risk Areas – Figure 6 (Page 16)**

I note from Figure 6 (and also paragraphs 5.17 and 5.18) that some significant parts of the Plan area are at Medium and High Risk of Surface Water Flooding.

From my initial assessment of the draft Plan, I do not identify any specific policy interventions that would seek to mitigate any impacts from surface water run-off that might arise from additional developments in the Plan area. The only mitigation that I do identify is the possible introduction of ‘rain gardens’ as part of the Public Realm initiatives set out in (non-policy) Project Box A.

Can the **Qualifying Body** please review the points that I have made above and provide me with a Note that sets out potential amendments to the draft Plan that address the mitigation of Surface Water Flood Risk across the Plan area, which I may consider as potential recommended modifications to the draft Plan.

KNPFs response:

Flood risk is an issue in the neighbourhood plan area. As the matter of flood risk and sustainable drainage is adequately covered in both Brent and Camden Local Plans, it is not considered necessary for the neighbourhood plan to repeat these policies. However, Project Box A (h) could be moved into WK1 as this adds a local requirement, with SuDS opportunity mapping showing it would be very effective along this part of the High Road.

If necessary, we could add the following paragraph to WK1 and remove from project box

“Contribute to or help deliver the introduction of ‘rain gardens’, helping to manage surface water run-off and introducing areas of greenery and biodiversity. The implementation of rain gardens or similar will be supported both along the High Road and across the Neighbourhood Plan area.”

Also amend para 5.18 accordingly, as below.

“5.18 Introduction of ~~Bio-retention areas~~ rain gardens and other sustainable drainage features would also help address localised flooding risks by managing surface water runoff in a way that mimics natural processes, slowing down the runoff rate while providing wider benefits. While Kilburn does not suffer any flood risk from rivers, apart from Kingsgate Place where the former water course of the Kilburn stream 1 has flooded in the past, the High Road also flooded in 1975 other areas do have a significant threat from surface-level flooding (Figure 6).”

Additionally, we have been informed there is more recent data is available on flood risk and would appreciate your advice on whether or not to update the map (fig 6).