

# BRENT LOCAL PLAN PREFERRED OPTIONS CONSULTATION STATEMENT

November 2018



## Executive Summary

### Background

The London Borough of Brent (the Council) has undertaken a series of consultation events throughout 2017 and 2018 to gather evidence on Local Plan Issues and Options. The findings of the consultations have helped inform the content of the Brent Local Plan Preferred Options document that is being consulted upon from 8<sup>th</sup> November 2018 for 8 weeks. The Local Plan will guide the future development of the borough where the council is the local planning authority to 2041 and on some sites possibly beyond. Old Oak and Park Royal Development Corporation are the local planning authority for bits of Brent in Park Royal and on railway land from the north circular road down to Willesden Junction station. They are adopting their own Local Plan which is in an advanced stage of preparation having been submitted for examination. The Brent Local Plan will replace the Brent Core Strategy, Brent Site Allocations Plan, Wembley Area Action Plan and Brent Development Management Policies plans.

### Issues and Options Consultation

This document provides information on the results of the formal borough wide Brent Local Plan Issues and Options consultation that was undertaken from 8<sup>th</sup> February-22<sup>nd</sup> March 2018. A full consultation summary for work undertaken prior this stage of the Issues and Options consultation can be found by clicking on this link: [Brent Local Plan Consultation Summary Document](#) For the Issues and Options consultation, responses were collected principally via two mechanisms. One was through responses to particular questions raised in the Issues and Options document which could be responded to via the internet on a questionnaire, or via e-mail/ mail. In addition an interactive web map allowed people to identify areas and make comments. The comments can be viewed <https://brent.commonplace.is/comments>

### Response rate/ characteristics of respondents

Overall 120 people/ organisations responded to the on-line questionnaire/ via e-mail. 110 additional people/organisations registered but didn't end up responding. There were 404 visitors to the interactive map. 81 commented and 216 read in detail comments made.

Only a small number of respondents set out their anonymous demographic profile. This does give an indication of their characteristics, but the sample was so small that on many elements no substantive conclusions can be drawn from it. 83% of respondents lived in the borough. The proportion of males was slightly higher than the borough 51/49 split. Only 4% of

respondents were under 24 compared to 25% of the borough's population. 48% were white British, compared to 36% in the borough (borough comparisons from the 2011 Census). 30% had no religion compared to 11% in the borough. Christians were 25% compared to 48% in the borough.

## **Summary of Responses**

In overall terms there were no significant differences from the main issues that people highlighted as being important at the earlier Issues and Options workshops.

**Cross-Timescales:** Most respondents thought that the timescale of the Plan should be to 2041, with certain elements, e.g. housing figures having shorter timelines.

### **Existing Local Plan policies – good/need improvement:**

- a) Within the Core Strategy people highlighted the policies that protected or provided new green or social infrastructure were important/ still relevant;
- b) For the site allocations policies, concern was raised about the accuracy of residential capacity on allocations/ building heights the majority of which had been developed at higher figures than in policy
- c) For the Wembley Area Action Plan the green, social and physical infrastructure policies were regarded as being important/ relevant
- d) For the Development Management, tall buildings needed addressing, whilst the protection of local facilities and public houses were seen as important, as was dealing with car parking.

**Local Plan Structure:** There was support for bringing it together into one document. A shorter vision was preferred and less objectives than the currently.

**Potential for additional conservation areas or those which don't merit that status:** Kensal Rise, Kensal Green, Willesden Green, Harlesden and Barn Hill identified as potential.

**Areas specifically identified for regeneration:** Included high streets/ town centres, employment areas, NHS sites and Alperton.

**Higher density development:** The need for tall buildings was recognised, but there was limited enthusiasm for their provision. Reducing standards to allow for lower rise higher density development was not supported.

**Additional/ extension of Growth Areas:** Opportunities for expansion of Growth Areas related to Wembley and Burnt Oak/ Colindale.

**Suburban Intensification:** The reuse/ redevelopment of buildings was supported, but there was limited appetite for in-fill development.

**Sites suitable for development:** Overall in comparison to identified needs for development there was very little feedback on sites that were considered appropriate for new development. Some public sector land, e.g. TfL rail land and NHS land was identified.

**Affordable and Family Housing:** In relation to affordable housing, the general public were very supportive of a 50% target and for this to be genuinely affordable homes. There was also support for the provision of additional family homes. The response from developers/ landowners and their representatives was that viability was a significant factor that needed to be taken into account which would require flexibility on number/ type of affordable homes and the percentage of family homes to let development proceed.

**Specialist Housing:** Northwick Park was identified as an appropriate location for student accommodation. In relation to Houses in Multiple Occupation, there was a limited response as to whether there was a need for policy/ places where there was an over-concentration.

**Employment:** There was a limited response on appropriate policies for employment land as well as training and affordable workspace.

**Town Centres:** A similarly a limited response. Two town centres that were identified where potential reduction in size might be appropriate were Harlesden and Willesden Green.

**Transport:** Focus was on current maintenance and congestion hot spots, plus the need for better walking and cycling provision in terms of routes, environment and facilities.

**Green Infrastructure/ Environmental:** There was a limited response. Support was given for the provision of new open space on development sites. There was no appetite for loss of even poorly performing open spaces, with an emphasis that these should be improved. There was support for improvement/ additional sports facilities, but no clear priority for particular sports identified. On

bio-diversity and sustainable infrastructure responses were more general about its need to be protected/ provided for, but limited in terms of specifics.

### **Consultation for Preferred Options Stage November 2018.**

The consultation will be promoted under the brand Shape Brent using the following methods:

- Social media - Twitter, Facebook, Yammer using #shapebrent
- Leaflets and posters/roller banners in council buildings
- Posters in Park Notice Boards
- Exhibition and flyers at Stakeholder Events/ Drop in Sessions
- Emailing Local Plan and Community Database
- Emailing Brent Citizen's Panel
- E-newsletter
- Promoting via Brent Connects mailing list
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent
- Main Council webpage and dedicated website [www.brent.gov.uk/shapebrent](http://www.brent.gov.uk/shapebrent)
- Elected Members' News bulletin
- Promotional Video

There will be a questionnaire to fill in and e-mail back or on-line. There will be an easy read/ summary document. An event will occur near the beginning of the process to which the Council has invited major stakeholders/ community representatives and ward councillors who are in a position to make others aware of the consultation and encourage them to respond. Workshop/ drop in sessions will be undertaken at a variety of times and dates within the various 'Places' identified in the Plan. A separate developer/ landowner session is also programmed to take place.

# 1. Introduction

## Consultation So Far

- 1.1 The Council undertook a series of consultation events throughout 2017 to gather evidence on issues and options. This information informed the content of the Brent Local Plan Issues and Options document that was issued for consultation between 8<sup>th</sup> February and 22<sup>nd</sup> March 2018. The findings of that consultation together with the responses to the formal Issues and Options document consultation has been used to inform a new Brent Local Plan. The new Local Plan will guide the future development of the borough until 2041 and on some sites, potentially beyond. The next stage of consultation is on Preferred Options. This will start on 8<sup>th</sup> November 2018.
- 1.2 The stages of the consultation/ adoption are summarised in Figure 1. The consultation findings have informed high level issues and options for the future development of the borough where the Council remains the Local Planning Authority.

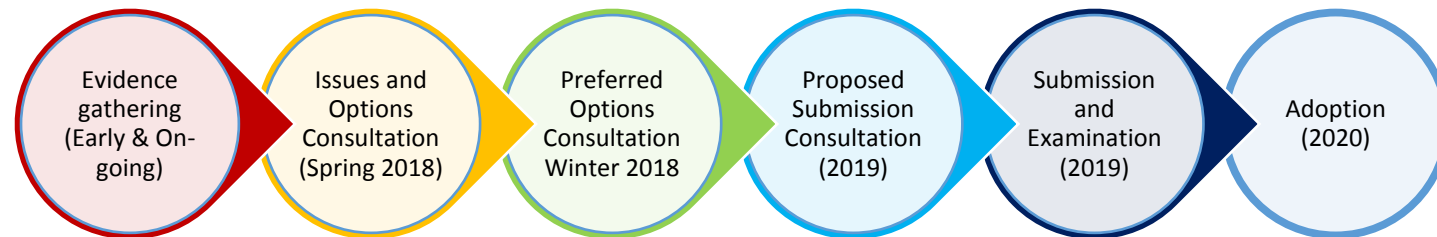


Figure 1. Adoption Stages

## Results of Issues and Options Consultation

- 1.3 Extensive engagement occurred prior to the formal Issues and Options consultation. The extent of this process and the outcomes of it can be found by clicking on this link: [Brent Local Plan Consultation Summary Document](#) . The document you



are currently reading in this section principally addresses the results of the formal Issues and Options document consultation which occurred in February and March 2018.

### **Raising Awareness**

1.4 The consultation was promoted under the brand Shape Brent using the following methods:

- Social media - Twitter, Facebook, Yammer using #shapebrent
- Leaflets and posters/roller banners in Council Buildings
- Posters in Park Notice Boards
- Exhibition and flyers at Drop in Sessions
- Emailing Local Plan and Community Database
- Emailing Brent Citizen's Panel
- E-newsletter
- Promoting via Brent Connects mailing list
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent
- Main Council webpage and dedicated website [www.brent.gov.uk/shapebrent](http://www.brent.gov.uk/shapebrent)
- Elected Members' News bulletin

### **Format of Consultation**

1.5 Drop-in sessions were held across the borough in the Council's libraries and at the Civic Centre to target different audiences. These were held at different times of the day to encourage greater participation. These raised awareness of contents of the document, the issues and options that potentially had to be addressed in Brent's local plan and assisted people in identifying how they could respond, or assisting their on-line response.

Local Plan Issues & Options Drop in sessions

- 22<sup>nd</sup> February, 11am-2pm, Brent Civic Centre foyer
- 27<sup>th</sup> February 3pm-6pm, Willesden Green Library
- 5<sup>th</sup> March 10am-1pm, Kilburn Library

- 9<sup>th</sup> March 12-3pm, Ealing Road Library
- 14<sup>th</sup> March, 12.30-3.30pm, Harlesden Library
- 15<sup>th</sup> March, 4pm-7pm, Kingsbury Library

#### Other events

- 28<sup>th</sup> February 5pm-7pm, LGBT History Month
- 8<sup>th</sup> March 10am-2pm, International Women's Day

- 1.6 For the Issues and Options consultation, responses were collected principally via two mechanisms. One was through responses to particular questions raised in the Issues and Options document which could be responded to via the internet on a questionnaire, or via e-mail/ mail. In addition an interactive web map allowed people to identify areas and make comments. The comments can be viewed <https://brent.commonplace.is/comments>

#### **Response Rate and Equalities**

- 1.7 Overall 90 people/ organisations responded to the on-line questionnaire/ via e-mail. 110 additional people/organisations registered but didn't end up responding. There were 404 visitors to the interactive map. 81 commented and 216 read in detail comments made.
- 1.8 Unfortunately only a small number of respondents set out their anonymous demographic profile. This does give an indication of their characteristics, but the sample was so small that on many elements no substantive conclusions can be drawn from it. 83% of respondents lived in the borough. The proportion of males was slightly higher than the borough 50/50 split. Only 4% of respondents were under 24 compared to 25% of the borough's population. 48% were white British, compared to 36% in the borough (borough comparisons from the 2011 Census). 30% had no religion compared to 11% in the borough. Christians were 25% compared to 48% in the borough.



## **2.0 Consultation Responses and How These Have Been Addressed in Taking Forward the Local Plan**

### ***Question 1: What are the cross-London borough planning issues that Brent should take account of in the Local Plan review?***

- 2.1 There were many single responses to this question, but the principal ones were air pollution, provision of affordable housing, transportation, crime and condition of highways.

#### **How Addressed in the Preferred Options Local Plan**

- 2.2 On strategic matters the Preferred Options Plan essentially defers to the draft London Plan. The Brent Local Plan will only address strategic matters at a local level where it refers to specific sites or areas of Brent, e.g. transportation matters reserving land for the West London Orbital line. On cross-border issues there has been some engagement with neighbouring London Boroughs, on a range of matters to ensure that respective Local Plans are complementary wherever possible, e.g. Opportunity Areas along borders, or on subject matters such as affordable housing, or water management. The Council has worked with other boroughs in commissioning evidence base studies at a West London level, the Strategic Housing Market Assessment, Strategic Flood Risk Assessment, Affordable Workspace Study, Employment Land Review, Gypsy and Travellers Needs Assessment and Small Housing Sites Capacity Assessment.

### ***Question 2: What timescale should the Brent Local Plan Review focus on?***

- 2.3 The response to this was mixed with a variety of timescales identified. Those who supported shorter timescales wanted more immediate action and didn't want issues to get lost by putting them off for the future. Those who supported longer timescales thought that this would come up with better planning solutions than a focus on the short-term. Many thought different issues could have different timescales. There was a desire for the plan to be kept up to date to meet changes in circumstances.

#### **How this is addressed in the Preferred Options Local Plan**

- 2.4 The Plans takes a long term view consistent with the London Plan of a timescale to 2041. On some matters such as the Housing Target however it breaks the plan down e.g. housing focus on meeting 10 year London Plan target, whilst providing a figure for beyond and seeks to monitor delivery against 5 year timelines.

**Question 3: Are there any policies you consider are still relevant, need changing or are not needed? For each policy explain why and if necessary any minor changes that each policy might require.**

- 2.5 **Core Strategy:** Respondents considered the majority of all of the policies as being still relevant, with requirements for some change, rather than complete removal. The exception to this was CP22 sites for Sites for Nomadic Peoples which had little support and the greatest level of identification for removal. Policies with the greatest level of support for their current relevance included the CP1 Spatial Development Strategy, CP5 Placemaking, CP14 Public Transport Improvements, CP15 Infrastructure to Support Development, CP17 Protecting and Enhancing the Suburban Character of Brent, CP18 Protection and Enhancement of Open Space and CP19 Climate Change. Policies where greater emphasis on the need for change was identified were: CP7 Wembley Growth Area, CP8 Alperton Growth Area, CP9 South Kilburn Growth Area, CP11 Burnt Oak/ Colindale Growth Area and CP13 North Circular Road Regeneration Area. This is unsurprising as these are places which have seen greatest change.
- 2.6 **Site Allocations:** Many of these sites have been developed or part developed, so will need removal/ amendment to reflect changes in situation. Comments received included that existing allocations grossly underestimate number of dwellings, density of development and heights of buildings that have been given permission (Alperton & Wembley), with consequences for amenity and local infrastructure.
- 2.7 **Wembley Area Action Plan:** The current strategic (WEM) policies that were considered most relevant were WEM34-WEM39 which focus on the need for provision of open space, open space improvements, food growing, sports facilities play provision and access to nature. Policies which required most change were identified as WEM4 Public Art, WEM4 Tall Buildings, WEM26 Hot Food Takeaways and WEM29 Community Facilities. These responses can be seen as being consistent with feedback received at the local events which identified concerns with what was considered a central London type environment being created at Wembley Park, the pressure on infrastructure and concerns about the quality of the town centre. Perhaps unsurprisingly site specific (Site W) policies were generally identified as being needed/ most relevant on the sites where the least development had occurred and less so where development had started.
- 2.8 **Development Management Policies:** No policy was considered necessary for removal. Policies which were considered more in need of review were: DMP1 General Development Management Policy, DMP4 Neighbourhood Parades, DMP5 Markets & Carboot Sales, DMP12 Parking and DMP21 Public Houses. This appeared to be related to growth in number of tall buildings, loss of local facilities/ public houses and pressures on parking. Those least requiring change were DMP2

Supporting Strong Centres, DMP8 Open Space, DMP9b On Site Water Management/ Attenuation and DMP17 Conversion of Family Sized Homes.

**How this is addressed in the Preferred Options Local Plan**

2.9 All current policies have been reviewed taking account of the draft London Plan, national policy, local issues and proposed site allocations. Greater reliance will be placed on the draft London Plan to provide strategic policies that will not be repeated in the new Brent Local Plan. These policies will be appropriately referenced. This result in many current Brent Local Plan policies being removed, particularly in relation to the Core Strategy policies where they are not locally distinctive/ add more to London Plan. The site allocations will be amended to reflect new sites/ revised assumptions on existing not developed; WAAP out of date policies will be removed; and DM Policies – light touch update to take account of change in circumstances where necessary.

***Question 4: Should the Plan tie together all policies into a single document? Yes/No***

2.10 Small number of responses, those who supported one document felt it would make it simpler/ easier to understand, whilst one person considered policies should be dealt with separately.

**How this is addressed in the Preferred Options Local Plan**

2.11 The Plan has been consolidated into one document but split into clear sections. It identifies the existing policies that have been incorporated / amended.

***Question 5: Is the proposed structure of the Brent Local Plan as set out in 2.18 the most appropriate? Yes/No***

2.12 Responses were generally positive about the proposed structure.

**How this is addressed in the Preferred Options Local Plan**

2.13 The structure consulted upon: Vision, Strategic Objectives either related to subject matter or themes; Place based policies rooted in the characteristics of the locality, including site allocations; and Development Management Policies has essentially been taken forward in the Preferred Options Local Plan.

***Question 6: Are the places shown in Figure 3 appropriate as a way for recognising more locally relevant areas? Do you have any comments on this approach, or perhaps suggestions for more locally relevant names?***

2.14 Responses were limited, but one highlighted the impact of the North Circular as a real division, another considered that Neasden had been split across two areas. Others considered that the names should reflect the main centres, e.g. Central = Wembley or Wembley Park.

**How this is addressed in the Preferred Options Local Plan**

2.15 Minor amendments have been made to boundaries reflective of greater understanding of physical separation/ communities. The names have remained the same as the alternatives proved to be too long and in some cases there was no clearly defined boundary of where an area, e.g. Neasden begins/ends.

***Question 7: How should strategic borough wide policies be grouped?***

2.16 No substantive comments on this.

**How this is addressed in the Preferred Options Local Plan**

2.17 Taking account of structure of London Plan, which most applicants will have to refer to initially, a subject matter structure consistent with this has been taken forward. This will most likely make it easier for people to understand how London wide and Brent policies work together.

***Question 8: What should the 'vision' be for the new Brent Local Plan and why?***

2.18 Responses were varied, with many concentrating on one particular issue, which included: desirability of place, quality of life, environment/ green spaces/ environmentally friendly, safety, Brent residents, provision of housing/ affordable housing, community, working class and celebrating diversity. The length of the current vision was criticised; it should be concise, but ambitious, with concise bullet point objectives under each heading of the Local Plan.

**How this is addressed in the Preferred Options Local Plan**

2.19 A more succinct vision has been taken forward taking account of the new Brent Borough Plan.

***Question 9: What should the strategic objectives be for the new Brent Local Plan and why?***

2.20 Some considered the existing strategic objectives relevance. Others highlighted individual issues, some of which are covered by the existing objectives, whilst others aren't. Responses included improving standards of living of existing residents, education, housing and health; making it a place where people want to live and feel safe; making interests of residents a priority, more green infrastructure, bio-diversity and homes, affordable homes and homes with gardens, minimise vacant buildings, improve air quality, focus less on Wembley, more monies and attention to the south; reduce car use; promote participative planning, and inclusive growth rather than displacement regeneration.

**How this is addressed in the Preferred Options Local Plan**

2.21 The draft London Plan Good Growth Policies are considered to be good strategic objectives/ outcomes for planning in Brent. The Brent Local Plan seeks to identify Brent specific elements that will deliver and complement these policies.

***Question 10: What should be shown on the Key Diagram of the new Brent Local Plan?***

2.22 Answers varied, including as existing but with clearer more defined boundaries, whilst other suggestions were made such as West London Orbital plus a northern (Harrow, Kingsbury, Colindale town centres/ stations) and southern east/west corridor, Locally Significant Industrial Sites, ward boundaries and names and sports facilities.

**How this is addressed in the Preferred Options Local Plan**

2.23 Some additional information been added to the Key diagram to reflect current circumstances, but not deflect from the clarity of the diagram. More local detail is included in the Place based key diagrams.

***Question 11: Are there any other areas of Brent that have a special character, and you feel are worthy of becoming a conservation area?***

2.24 Some individual buildings were identified, all of which are on the existing/ or have been identified in a draft revised Local List. Areas identified included Kensal Rise and Kensal Green, areas between Queen's Park and Kilburn, Willesden Green to be extended, Harlesden along Park Parade and Barn Hill to include all the hill.

#### **How this is addressed in the Preferred Options Local Plan**

2.25 These matters have been addressed in the Historic Environment Place-Making Strategy which will accompany the Preferred Options Local Plan consultation.

***Question 12: Are there any existing conservation areas which have lost their special character and should no longer be designated? Please identify the areas and justify why it should no longer be a conservation area.***

2.26 Only one comment which was criticism of question and implications, as its very designation should not allow such scenarios to occur.

#### **How this is addressed in the Preferred Options Local Plan**

2.27 These matters have been addressed in the Historic Environment Place-Making Strategy which will accompany the Preferred Options Local Plan consultation. This includes a programme to reconsider conservation areas in line with good practice on need to regularly review to consider whether some need to be extended, reduced, or de-designated.

***Question 13: In addition to conservation areas, are there any other areas with a special character which should inform the types of new development that will be acceptable in those areas?***

2.28 Areas mentioned include Carlton & Granville Centres, Stanley & Blenheim Gardens and some sections of Cricklewood Broadway, as well as Kensal Green and Rise mentioned in relation to conservation areas. Willesden Green towards Dollis Hill. Other comments focused on limiting unnecessary restrictions for non-heritage assets and recognising that large regeneration areas could generate their own character rather than potentially being compromised by adjacent areas of limited character.

#### **How this is addressed in the Preferred Options Local Plan**

2.29 Potential conservation areas are identified as Areas of Special Character prior to the formal statutory process for their potential designation being undertaken, so that they are less likely to have their character undermined in the meantime.

***Question 14: Are there any areas of Brent which are in need of regeneration, where new development should be encouraged to change and improve character?***

2.30 Areas mentioned included - Kingsbury High Street, Colindale Edward Road/A5 Growth Area, Preston Road, Willesden Junction, Harlesden, Willesden Junction, every station, East Lane Industrial Estate, Central North West London (CNWL) NHS Foundation sites, Wembley Industrial Area, Willesden Green (sympathetically with existing context) and Alperton.

**How this is addressed in the Preferred Options Local Plan**

2.31 The majority of the areas are subject to specific policies that encourage their future regeneration.

***Question 15: Solutions to meeting growth challenges, e.g. tall buildings, lower rise buildings but compromise on standards, or rely on character to inform height/density.***

2.32 Tall buildings – answers focussed on the need to meet targets with potential to contribute to townscape, those not in favour identified them as eyesores, changing character and perceptions of safety and unlikely to provide affordable housing with criticism of Wembley Park design quality.

2.33 Lower buildings/ compromise standards – there was little support for compromising standards which was considered likely to adversely impact on quality of life/ mental health.

2.34 Take account of existing character – this was supported the most but most people interpreted this as meaning no tall buildings.

**How this is addressed in the Preferred Options Local Plan**

2.35 The Plan principally take account of existing character, but recognises that in accordance with London Plan that a positive strategy and sites will have to be identified for taller buildings. The Local Plan focuses on providing ‘clusters’ of tall and



increased height, whilst removing opportunity for isolated tall buildings. Lower scale, but taller buildings than exist are identified for intensification corridors and town centres.

***Question 16: Where do you consider are the most appropriate or inappropriate areas for tall buildings and why?***

2.36 The responses to this part were limited, consistent with the general antipathy towards these types of buildings.

**How this is addressed in the Preferred Options Local Plan**

2.37 The approach taken forward is to cluster tall buildings in highest Public Transport Accessibility Level (PTAL) areas and those areas where the Tall Buildings Strategy points to such opportunities as part of a positive plan-led strategy.

***Question 17: Should the council continue to focus on identifying Growth Areas as the principal locations for development activity to accommodate needs related to population growth?***

2.38 The responses to this were limited. Opportunities were identified at Kingsbury (subject to improved orbital public transport), Northwick Park campus and smaller points e.g. Stonebridge Park and Harlesden stations.

**How this is addressed in the Preferred Options Local Plan**

2.39 Taking account of the character of areas and draft London Plan policies opportunities for additional development at Northwick Park, Kingsbury station and other areas that appear to be strong candidates for regeneration, e.g. Land at Staples Corner have also been identified either as additional Growth Areas, or suitable for higher intensity of development.

***Question 18: Are any of the Growth Areas able to accommodate more development, etc?***

2.40 Responses again were limited. Wembley was identified particularly around making public realm improvements, e.g. reducing hostility of environment to pedestrians from vehicle movement. This could be done with encouraging light industrial led redevelopment/ regeneration. Burnt Oak/ Colindale – consideration of employment area to Stag Lane. Asiatic Carpets Church End can accommodate significantly more homes than current allocation.

**How this is addressed in the Preferred Options Local Plan**

2.41 Further opportunities around existing larger Growth Areas which would appear to have less efficient use of land/ run down character such as at Alperton, Burnt Oak/ Colindale, Church End and Wembley have been identified and Growth Areas extended. The South Kilburn masterplan SPD 2017 sites have been formally allocated for development.

***Question 19: Should higher density housing in suburban areas with greater public transport accessibility be through: conversion/ extensions to existing buildings; infill in spaces between buildings; comprehensive redevelopment of sites, or other?***

2.42 Limited number of responses – positive about reuse of buildings and comprehensive redevelopment, but negative about infill.

#### **How this is addressed in the Preferred Options Local Plan**

2.43 In light of draft London Plan policy the Council has adopted a more interventionist approach to identifying comprehensive redevelopment opportunities in and around town centres and stations, such as the proposed Neasden and Staples Corner Growth Areas to limit piecemeal development.

***Question 20: What other alternatives are there to delivering the level of development that will support the growing population needs of Brent, but also create good places?***

2.44 Limited response which included reusing buildings, better forward planning, community led developments and potentially amending standards/ products to allow younger people to set up home whether that be in a communal type setting, e.g. HIMO/collective or on a self-contained basis.

#### **How this is addressed in the Preferred Options Local Plan**

2.45 None specifically as a result of these responses.

***Question 21: Are there any specific sites that you are aware of that can be identified as Local Plan site allocations and why they should be allocated for development?***

2.46 Limited response identifying walkway tunnel that links Chapter Road to Gladstone Park Primary School, East Lane, Wembley Industrial Park, TfL land Wembley Park and CNWL NHS Trust sites.

### **How this is addressed in the Preferred Options Local Plan**

2.47 Chapter Road has been assessed but is unrealistic due to the lack of viability of reconfiguring the existing buildings. The other sites are subject to general intensification policies e.g. East Lane industrial estate or site allocations, e.g. Wembley Park station and Northwick Park campus.

### ***Question 22: What Brent net additional homes target should the council identify is appropriate for the inclusion in the London Plan?***

2.48 The responses to this either focussed on the need to meet the London Plan target or that Brent is too crowded and should seek to build a few homes as possible.

### **How this is addressed in the Preferred Options Local Plan**

2.49 The Plan has sought to identify the maximum development realistically possible to meet the draft London Plan target. In terms of the draft London Plan target the plan identifies more than sufficient large sites. The Council however does not consider that the draft London Plan small sites target is credible, as such it does not use this figure. If it did the Plan would deliver more homes than the draft London Plan target.

### ***Question 23: Appropriate affordable housing target.***

2.50 From the general public there was more support for the 50% target, although many questioned the affordability of affordable homes provided. The professionals considered 50% too high and pointed to the 35% target set by the Mayor as a recognition of this, as long as viability could still be assessed where lower proposed.

### **How this is addressed in the Preferred Options Local Plan**

2.51 The Plan is consistent with the Mayor's approach of a strategic 50% target but with a viability threshold of 35% approach. Tenures will be focussed on rented products that even at their maximum are accessible to those on benefits.

### ***Question 24: Greater flexibility in relation to on-site affordable housing provision?***

2.52 The general public were against this flexibility as it was likely to polarise communities, developers sought greater flexibility.

**How this is addressed in the Preferred Options Local Plan**

2.53 Taking account of London Plan and national policy which prioritise on site provision it is considered that there is need for a Brent specific solution/ policy.

***Question 25: Affordable Housing Tenure Split?***

2.54 The majority of respondents considered that there needed to be a mix, with products genuinely affordable and also those that catered for those working/ wanting to buy. Developers wanted flexibility/ pragmatism on a site by site basis.

**How this is addressed in the Preferred Options Local Plan**

2.55 Taking account of the needs and viability assessment work a preferred local mix that maximises London affordable/social rent/affordable rented products is prioritised (70%) as a proportion of the affordable housing but also seek a minimum 30% intermediate (shared ownership/ London Living Rent).

***Question 26: Encouraging greater provision of purpose built private rented schemes should the Local Plan: have any specific Brent policies; or rely on London Plan policy?***

2.56 Responses were limited, there were some that considered a Brent policy necessary, but were not clear on what it should contain (apart from reducing provision). Others considered Brent should use London Plan policy.

**How this is addressed in the Preferred Options Local Plan**

2.57 The Plan seeks to ensure that an element of Build to Rent is provided in Growth Areas and on major development sites.

***Question 27: Should Brent continue to support the provision of family sized housing (3+ beds) by setting a minimum percentage target?***

2.58 The majority who responded considered this approach appropriate, as local needs are for family accommodation. Developers wanted greater flexibility related to the site/ development context.

**How this is addressed in the Preferred Options Local Plan**

2.59 The Plan seeks to take forward a local policy similar to Brent's current policy seeking 25% 3+ bed with some (limited) flexibility for site/ development characteristics.

***Question 28: How can planning policies provide attractive alternative forms of accommodation that will encourage older people who are 'under-occupying' larger properties to move?***

2.60 There was an emphasis on providing a range including generous sized aspirational owner-occupier properties and also extra-care/ supported independent living.

**How this is addressed in the Preferred Options Local Plan**

2.61 The Plan seeks to ensure that the provision of older people's housing is considered in Growth Areas and major housing developments, with 10% being identified as a target for those areas.

***Question 29: Are there areas of Brent other than Wembley Park which should be identified as preferred locations for student accommodation.***

2.62 Very limited response. Northwick Park was suggested.

**How this is addressed in the Preferred Options Local Plan**

2.63 The Plan takes forward a general policy that allows for student accommodation in Growth Areas seeking to limit the number of students as no more than 20% of the resident population anticipated in the Growth Area.

***Question 30: Taking account of the effects so far in Wembley Park, should a higher or lower proportion than 20% of the population living in purpose built student accommodation be allowed in that or any other area?***

2.64 The responses were limited but ranged from zero to letting the market decide.

**How this is addressed in the Preferred Options Local Plan**

2.65 A target of 20% is considered to allow sufficient opportunity/ supply to meet student/ market needs, particularly if alternative appropriate sites such as other Growth Areas are identified as also having the potential.

***Question 31: As with student housing, should there be limits on other types of specialised accommodation, such as Housing in Multiple Occupation, to ensure that there is not an over-concentration within a particular area?***

2.66 A limited number of responses, those who considered limits were necessary identified the potential adverse impacts of transient populations and the need for spread of tenures evenly across the borough.

**How this is addressed in the Preferred Options Local Plan**

2.67 Taking account of concerns raised by some communities about the adverse impact of an over-concentration of Houses in Multiple Occupation a simple to administer measure is proposed in policy. This seeks to allow for the need for additional HMS but limit them to no more than 40% of any particular area as well as applying other criteria applicable to other communal establishments to ensure amenity of residents is not significantly undermined.

***Question 32: What policies does Brent need to ensure that the wide range of specialist housing needs are met, including supported housing for older people?***

2.68 There were limited responses on this. A generic positively written supportive policy was considered to be the most appropriate with potentially site allocations also assisting delivery.

**How this is addressed in the Preferred Options Local Plan**

2.69 A policy is included which identifies the need for specialist older people's housing in terms of annual provision and seeks its inclusion within Growth Areas and on large development sites (500+ dwellings).

***Question 33: Should the council do more through the use of additional Article 4 directions to allow it to better plan to meet the growing needs of employment uses?***

2.70 There were a limited number of responses but the majority who responded felt there was a need for additional controls.

**How this is addressed in the Preferred Options Local Plan**

2.71 A decision if additional protection is required through an Article 4 direction to protect existing/ re-provide new employment in development sites outside protected areas where it already exists will be made after the Local Plan has been adopted and against other work priorities.

***Question 34: Should the council use planning policy to support key growth sectors for development in Brent in order to attract higher wage employment?***

2.72 There was a very limited response, but support for artists' studios/ meanwhile uses, some workers space in Dudden Hill/ Willesden Green plus low cost accommodation for construction employees to support OPDC area.

**How this is addressed in the Preferred Options Local Plan**

2.73 The Plan includes a policy that supports cultural enterprise zones/ workspace in line with Mayoral policy, plus a policy for the provision of affordable workspace, identifying areas where priority of provision should occur.

***Question 35: How should the Council help the development of a workforce skilled for higher income employment?***

2.74 Limited response given, supportive suggestions related to provision of apprenticeships and local colleges providing outreach centres in growth locations.

**How this is addressed in the Preferred Options Local Plan**

2.75 A supportive policy seeks the delivery of an Employment, Apprenticeship and Training Plan will be required for all major developments, to be prepared in partnership with Brent Works or any successor body.



***Question 36: What sites would most benefit from intensification for employment and/ or mixed use***

2.76 The response was very limited. South Kilburn was identified along with Wembley industrial estate.

**How this is addressed in the Preferred Options Local Plan**

2.77 The Council has undertaken an assessment of the characteristics of existing SIL and LSIS and in the context of the need to intensify employment space provision, but also dwelling numbers identified employment areas which should be subject to intensification/ co-location and those where the emphasis should only be on intensification.

***Question 37: Are there any not previously identified sites that would be suitable for industrial purposes?***

2.78 There were no suggestions.

**How this is addressed in the Preferred Options Local Plan**

2.79 The Plan moving forward has sought to protect the employment element on reuse of existing local employment sites and on some large scale applications, sought for greater inclusion of employment floorspace than would have previously been the case.

***Question 38: Where should Brent seek to apply its affordable workspace policy?***

2.80 The least support was given for existing SIL and LSIS areas (presumably as this would impact on investment in renewing stock). The greatest support was where existing employment space was being lost, followed by within mixed use developments and in growth areas, although it had to be balanced up with viability. There was a desire by industrial land occupiers (e.g. builders' merchants) to not be pushed out completely, but be accommodated in new developments.

**How this is addressed in the Preferred Options Local Plan**

2.81 The Plan incorporates a policy that seeks affordable workspace in Growth Areas and also where the redevelopment/reuse of a Local Employment Site includes non-employment uses.

**Question 39: Do you agree with the hierarchy of town centres in Brent as set out in Figure 9?**

2.82 Very limited response. Quintain state Wembley should be Metropolitan centre.

**How this is addressed in the Preferred Options Local Plan**

2.83 Maintain position submitted to London Plan that Wembley should be a Metropolitan Centre.

**Question 40: Which town centres could possibly be reduced in size/length to encourage other non-retail uses and by how much?**

2.84 Very limited response. Those identified included Willesden Green (between there and Dudden Hill Lane) and Harlesden (Craven Park Road).

**How this is addressed in the Preferred Options Local Plan**

2.85 Boundaries of the town centres have been amended taking account of the retail and leisure needs assessment. Policies also support the alternative use of premises on the periphery of town centre secondary frontages for alternative uses.

**Question 41: Are there any policies required in addition to those in the draft London Plan and Brent's pub protection policy that could support the night time economy or a greater cultural offer within Brent's town centres?**

2.86 Limited response. There were concerns about the impacts of the night time economy. There was also a representation that provision of restaurants on industrial estates (where there is greater access to parking at off-peak times) easier.

**How this is addressed in the Preferred Options Local Plan**

2.87 The plan includes a policy consistent with the London Plan on night time economy. It states that development that preserves or enhances existing night time economy activities or creates new ones that will reinforce the role and significance of each centre in the London hierarchy in an inclusive and accessible way will be supported, whilst that which would undermine it will be refused. Potential adverse impacts such as noise, anti-social impacts, waste management, etc can be assessed against the general development management policy that will remain.

***Question 42: Minimum amounts of retail premises within primary shopping frontage?***

2.88 The responses were mixed with some seeking less control whilst others wanted more control on elements like estate agents, betting shops and takeaways.

**How this is addressed in the Preferred Options Local Plan**

2.89 The recommendations of the retail and leisure needs study have been taken into account. Primary frontage boundaries have been redrawn and reduced in some areas, whilst the percentage A1 in policy terms is retained at 65%.

***Question 43: How can the Local Plan do more to support the borough and town centres in relation to accessibility and Information Technology needs?***

2.90 Very limited response, across the range of measures identified.

**How this is addressed in the Preferred Options Local Plan**

2.91 The Infrastructure Delivery Plan can identify necessary IT infrastructure projects, timing and funding amount/ sources.

***Question 44: Are there any other ways the council could reduce the private vehicle use, for example through new and emerging technologies?***

2.92 There were a variety of responses, the majority of which are already addressed in the existing Mayoral and Brent Transport Strategy.

**How this is addressed in the Preferred Options Local Plan**

2.93 The Plan relies on existing generic London Plan transport policies and takes forward amended DMP policies related to parking provision/ urban design to support modal shift.

***Question 45: Do you support the proposal for a West London Orbital Rail Link?***

2.94 The majority were supportive. It was commented there is a need to plan for longer term development of the line should capacity/ additional stations need to be increased.

#### **How this is addressed in the Preferred Options Local Plan**

2.95 The Plan incorporates policies that protect the existing railway land from inappropriate development. It also seeks in relation for instance to the proposed Neasden Stations Growth Area of the need to take account of/ support/ not undermine the development of the line. The WLO feasibility work is addressing requirements for simpler implementation of additional capacity so that appropriate land can be reserved for it, such as longer platforms.

#### ***Question 46: Are there any other specific improvements to public transport the Council should seek?***

2.96 Numerous individual suggestions were put forward for stations (Step free at Willesden Green, Dollis Hill, Preston Road and North Wembley), more lifts at Wembley Park, Metropolitan Line to stop at Willesden Green, reinstatement of 245 bus service to Sudbury, cycle hub at Wembley Park.

#### **How Addressed in the Preferred Options Local Plan**

2.97 The Local Plan identifies improved transport measures such as supporting step free access at stations in a general policy on sustainable transport as well as in site allocations such as Northwick Park Growth Area, plus other aspirations in supporting text / Place chapters. Where appropriate schemes will also be included in the Infrastructure Delivery Plan (IDP) list for which CIL/ S106 funds could potentially be allocated.

#### ***Question 47: What policies should the Local Plan include to minimise the impact of freight movements or goods delivery in Brent?***

2.98 Limited response, focussed on moving freight to canals, encouraging electric vehicles and flexibility on servicing times.

#### **How this is addressed in the Preferred Options Local Plan**

2.99 The Plan relies on proposed London Plan policies and amends the existing Brent Local Plan that seeks to address the provision and protection of freight facilities and provision of adequate servicing in developments.

**Question 48: Please identify any specific walking and cycling routes that could be improved and how?**

2.100 Subway between Chapter Road and Gladstone Park primary school, cycling infrastructure: between Wembley/ Willesden Green/ Queen's Park, Kilburn High Road, Bathurst Gardens, crossing N Circular Road, Fryent Way, A5, modal filters on Chapter Road, Chatsworth Road, Brook Ave, Carlton Ave east, Elmstead Ave and Grasmere Ave and Vale Farm to Harrow/ Wembley. Pedestrian: crossing Tubbs Road and Harlesden High Street, pavements Ealing Road & Wembley High Road. Links East Land to Carlton Avenue East.

**How this is addressed in the Preferred Options Local Plan**

2.101 Highlight aspirations in supporting text / Place chapters. Major schemes have been considered as part of the Brent transport strategy, whilst individual priority projects can also be identified in the Infrastructure Delivery Plan (IDP) list for which CIL/ S106 funds could potentially be allocated.

**Question 49: Do you agree that the current open space designations are correctly identified in Figure 15 in the Issues and Options document?**

2.102 Very limited response. There was a need for railway corridors to be identified as open space.

**How this is addressed in the Preferred Options Local Plan**

2.103 Access to these spaces to the public is restricted. The majority are categorised as Sites of Importance for Nature Conservation (SINCs), but as operational land with the railways having significant permitted development rights, such designations have limited weight. No change to current policy/ identification as green corridors/ SINCs where evidence of green infrastructure within their boundaries exists.

**Question 50: Are there any parts of designated open space that do not properly serve open space functions and could be improved or even re-designated for other uses?**

2.104 Limited responses focussed on adequacy of management/ use of parks such as King Edward, Barham and Roundwood Parks (southern part), but not use for alternative purposes, or the fact that open spaces need to be kept. At Northwick Park the potential for land swaps was identified.

**How this is addressed in the Preferred Options Local Plan**

2.105 Take account of open space study findings. It is anticipated that at the most one or two current spaces will be so deficient in quality/ function (including their potential) to be released for other uses. Consider Northwick Park in the round and if and where such an open space swap brings wider benefits promote this as part of the planned regeneration of this area.

***Question 51: Should the Council require all new housing developments over a certain size to provide public open space, rather than just private amenity space?***

2.106 There was overall support for this as availability of open space was considered necessary, but that the size should take into account the size of the development and proximity of other local open space.

**How this is addressed in the Preferred Options Local Plan**

2.107 New Growth Area policy, e.g. Staples Corner, Neasden Stations and Northwick Park requires a masterplan approach with the need to identify appropriate provision of open space prior to any development taking place.

***Question 52: Where an existing open space has no reasonable prospect of being fit for purpose should the Council consider its redevelopment to help fund improvements to other open spaces?***

2.108 The majority were against this proposition, considering it unlikely that such space could not be made fit for purpose, but where such loss was allowed that it be brought forward for community infrastructure purposes.

**How this is addressed in the Preferred Options Local Plan**

2.109 The outputs of the open space study have been considered. No existing open spaces have been identified in site allocations that would result in a loss of open space.

***Question 53: In relation to new development, what management approaches can the Council adopt for the provision and maintenance of new parks and open space?***

2.110 The response focussed on the need to consult prior to provision and ensure public ownership rather than privatisation of the spaces and encourage community groups to take 'ownership'/ manage the spaces. Where 'private' public open space is being provided ensure good levels of community access/ management.

**How this is addressed in the Preferred Options Local Plan**

2.111 The Plan provides flexibility to allow the developer to maintain an open space on an on-going basis or seek its adoption. It sets out the requirements in relation to the design of open space to address location and security, long-term management plan, layout and design, habitat creation, integration with other open space, and ownership.

***Question 54: What types of sports facilities should the Local Plan prioritise?***

2.112 The whole range of sports activities were highlighted, although interestingly not one came out as a priority. People wanted accessible facilities, or spaces that were flexible to be used for a variety of uses.

**How this is addressed in the Preferred Options Local Plan**

2.113 Take account of playing pitches and indoor facilities studies and work with the Council's sports and culture teams identify priority needs for the Infrastructure Delivery Plan (IDP) for CIL and S106 funding.

***Question 55: What measures can the Local Plan take to improve sports and recreation participation rates among residents?***

2.114 Responses tended to focus on management/ provision measures such as cost, opening, wardens, etc rather than spatial planning aspects. Opportunities for improved provision at Vale Farm and ensuring school facilities are open to the public were one area where planning was identified as potentially having a role.

**How this is addressed in the Preferred Options Local Plan**



2.115 The Plan identifies the need for sufficient open space, pitches, etc. in new development. It identifies in relation to Vale Farm the need to work with the local community to see how the vision set out in the Sudbury Neighbourhood Plan could be delivered. The plan also emphasises the need for wider community access to facilities that might be intended primarily for one group, and if necessary will seek community access agreements.

***Question 56: To what extent and how should development contribute to increased biodiversity?***

2.116 The responses focussed on the need for developments to incorporate green infrastructure and where existing bio-diversity rich sites are subject to development impacts to ensure no net loss and ideally greater provision.

**How this is addressed in the Preferred Options Local Plan**

2.117 The Plan takes forward current bio-diversity designations such as SINC. The draft London Plan has strong policies on provision of green infrastructure/ biodiversity. Brent's plan will add to these through a more locally distinctive policy related to local features and a tree policy.

***Question 57: Should Brent have any locally specific policies to promote environmental protection and sustainability/adaption to climate change?***

2.118 Respondents focussed on individual matters, such as improved air quality, planting more trees, retaining front gardens. Those who were aware of London Plan policies indicated that they considered them sufficient. Local policies/ approach might be necessary in relation to reducing flood risk.

**How this is addressed in the Preferred Options Local Plan**

2.119 The Plan essentially relies on the London Plan policies, but adds clarity on where combined heat/ power networks will be required in Brent (new Growth Areas and South Kilburn and Wembley Growth Areas). The Plan also seeks major commercial development to be BREEAM Excellent.

***Question 58: What infrastructure is needed in Brent over the plan period, and are there any particular sites that should be identified for where should it provided?***

2.120 Very limited response, one respondent identified the potential for Alperton bus routes to be improved through the area, another the need for communities to see the benefits of CIL as soon as possible.

#### **How Addressed in the Preferred Options Local Plan**

2.121 Work with colleagues to ensure that the Infrastructure Delivery Plan (IDP) provides a sound basis on which to prioritise provision and funding.

***Question 59: Which infrastructure has the potential to be co-located within large multi-purpose buildings which can adapt to various uses?***

2.122 Potential for sports facilities and health uses (more to encourage linked trips than save space). Community use of school buildings.

#### **How this is addressed in the Preferred Options Local Plan**

2.123 A social infrastructure policy is included in the plan which seeks to ensure flexible design of building, co-location of social infrastructure uses and opening up facilities to a wider range of groups through mechanisms such as community access agreements where necessary.

***Question 60: In relation to the Draft Local Plan IIA Scoping Report Table 4 are there other Policies, Plans, Programmes, Strategies and initiatives (PPPSIs) which should be considered for the purposes of producing the Local Plan?***

2.124 Reference to the GLA's Regional Flood Risk Appraisal should be listed, as well as any Strategic Flood Risk Assessment/Sequential Tests carried out to date. The West London SFRA Level 1 should be listed along with any future Level 2 SFRA. The Environment Agency's Thames Flood Risk Management Plan (2015-2021) is a relevant plan to include. For the climate change the "Planning for climate change – guidance for local authorities" by the Planning & Climate Change Coalition dated April 2012 is included as a relevant plan.

#### **How this is addressed in the Preferred Options Local Plan**

2.125 The draft Integrated Impact Assessment makes reference to these documents and these were considered in drafting the policies.

**Question 61: Are there any PPPSIs identified within the IIA Scoping Report that you consider to be irrelevant to the emerging Local Plan?**

2.126 No response.

**Question 62: Do you have any comments on the accuracy, scope and coverage of the baseline data included within the IIA Scoping Report (as set out in its Appendix 2) or know of any further data or indicators that might prove useful information? If so, provide details.**

2.127 No response.

**Question 63: Do you have any comments on the IIA sustainability issues and problems identified for the borough (Table 5) or know of any further issues and problems that should be included?**

2.128 No response.

**Question 64: Do you have any comments on the IIA objectives or know of any further IIA objectives that should be considered?**

2.129 Supported by Environment Agency with some suggested amendments.

**How this is addressed in the Preferred Options Local Plan**

2.130 The draft Integrated Impact Assessment has some minor amendments to its objectives.

**Question 65: Are there any additional potential indicators and/or targets for the objectives that have not been identified in Table 6?**

2.131 The Environment Agency identified several.

**How this is addressed in the Preferred Options Local Plan**

2.132 The draft Integrated Impact Assessment has had minor amendments to its indicators and targets.

***Question 66: Do you have any comments on the assessment framework?***

2.133 No response.

***Question 67: Do you have any comments on the methodology or conclusions of the Habitats Regulations Assessment (HRA) Screening Report (Appendix 4 of the IIA Scoping Report)?***

2.134 No response.

***Question 68: The Local Plan addresses a wide variety of issues that directly and indirectly impact on the health of the population. Are there any areas in which it is currently deficient or could be strengthened to ensure that future development better serves the health needs of Brent's residents and visitors?***

2.135 No response.

***Question 69: Given the very different population characteristics, particularly around its younger age, ethnicity, religion and maternity, are there any areas in which the Plan could be strengthened to ensure that future development better serves the needs of Brent's residents and visitors with protected characteristics?***

2.136 No response.

### **3.0 Consultation Preferred Options November 2018**

3.1 The consultation will be promoted under the brand Shape Brent using the following methods:

- Social media - Twitter, Facebook, Yammer using #shapebrent
- Leaflets and posters/roller banners in council buildings
- Posters in Park Notice Boards
- Exhibition and flyers at Stakeholder Events/ Drop in Sessions
- Emailing Local Plan and Community Database
- Emailing Brent Citizen's Panel
- E-newsletter
- Promoting via Brent Connects mailing list
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent
- Main Council webpage and dedicated website [www.brent.gov.uk/shapebrent](http://www.brent.gov.uk/shapebrent)
- Elected Members' News bulletin
- Promotional video

3.2 There will be a questionnaire to fill in and e-mail back or on-line. There will be an easy read/ summary document.

3.3 A launch event will occur near the beginning of the process to which the council has invited major stakeholders/ community representatives and ward councillors who are in a position to make others aware of the consultation and encourage them to respond. Workshop/ drop in sessions will be undertaken at a variety of times and dates within the various 'Places' identified in the Plan. This information will be made available on the website/ sent to relevant bodies outlined in paragraph 3.1 once a full programme has been finalised. A separate developer/ landowner session is also programmed to take place.

3.4 The consultation will be for 8 weeks starting on the 8<sup>th</sup> November 2018. It has been extended from the 6 weeks used for the Issues and Options stage to allow people to potentially use time over the Christmas holiday period and new-year to submit comments.