

Brent Local Plan Regulation 19 – Final Comments
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Document control

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Brent Local Plan Regulation 19 Consultation- Nov 2019

We set out below a response to the Regulation 19 public consultation and request for comments on the LB Brent new Local Plan document 'Local Plan Regulation 19 Consultation' dated November 2019.

The provision of a new, updated local plan is welcomed to reflect the changing nature of the Borough since the publication of the Core Strategy (2010), the Wembley Area Action Plan (2015) and Development Management Policies DPD (2016). Over this period the Borough has experienced ongoing demand for homes, jobs and infrastructure and a new plan to positively respond to these changes is required. The new Local Plan must also reflect changes to national policy which have taken place during the life of the current plan in the form of the revised National Planning Policy Framework (July 2018) and supported by Planning Practice Guidance and Ministerial Statements. Changes have also occurred on a regional scale in the form of the new Draft London Plan 2019 (consolidated suggested changes). All of which reflect continuing changes and trends within society, the economy and environment.

Quintain Ltd is a major land owner and developer within the London Borough of Brent and controls some 35 hectares surrounding the new National Stadium at Wembley. This area is recognised by Brent Council as suitable for major development, including retail, housing, leisure and entertainment, hotel, conferencing and offices. The land specifically lies within the identified 'Wembley Growth Area'. Quintain Ltd remain heavily committed to the comprehensive regeneration of the area and in December 2016 received outline planning permission under ref: 15/5550 and ref: 14/4931 for the Wembley Park and South West Lands Masterplans within the Wembley Regeneration Area. Reserved matters approval has now been secured for several masterplan plots which are now under construction, delivering over 7,000 new homes. Further masterplan plots are due to come forward over the next five years.

It is hoped that the submission version of the new Brent Local Plan document and policies will respond positively to the changing pressures being faced within the Borough. In so doing we would be grateful if you would kindly take into account the suggestions put forward in these representations as set out in the table below.

DOCUMENT KEY

Suggested text changes are underlined in the Quintain Regulation 19 comments table

Suggested deletions have a ~~strike~~ through the text in the Quintain Regulation 19 comments table.

1. Consultation Overview			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
		<ul style="list-style-type: none"> General comment: please review the photos used within the document and ensure they relate to the topics/chapters being discussed e.g. page 249 is the title page for new housing and despite Brent having a number of excellent housing schemes that could be shown a photograph of a hotel is used instead. Similarly, the photograph on page 125 is entitled 'South' but is Wembley Central Station, which is in the 'South West' Place. Also where photos of the Wembley Park Masterplan area are used, it would be preferable if these were recent and include the new developments recently completed/underway. Build to Rent affordable housing requirements: Policy BH5 is only for Non-Build to Rent developments. We consider that a policy setting out the affordable housing requirements to secure a fast track route for Build to Rent developments is also required in the Local Plan to give certainty and encourage more build to rent developments. This either needs to be included in Policy BH5, added to Policy BH3 or alternatively a bespoke BTR policy included in the plan. 	<p>LBB Response: Some changes made:</p> <p>Amend Plan to include more photos and their relevance to the Plan's contents.</p> <hr/> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> General Comment: No further comment on photos. Build to Rent affordable housing requirements: See our comments on Policy BH5 on page 20 below.
2. Introduction			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
11	2.1.7	<ul style="list-style-type: none"> We note that LBB has challenged London Plan housing targets on the basis of meeting the delivery target for small sites. 	<p>LBB Response: No change</p> <hr/> <p>Quintain Regulation 19 Comments</p> <ul style="list-style-type: none"> We note the EIP Panel recommendations in relation to the London Plan housing target and await the Mayor's response to these and how this will be reflected in the final Brent Local Plan.
11	2.1.8	<ul style="list-style-type: none"> We note the impact and challenges on the delivery of the Local Plan if the draft London Plan policies and targets remain unchanged. 	<p>LBB Response: No change</p> <hr/> <p>Quintain Regulation 19 Comments</p> <ul style="list-style-type: none"> We note the EIP Panel recommendations in relation to the London Plan housing target and await the Mayor's response to these and how this will be reflected in the final Brent Local Plan.
3. Spatial Portrait			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
18	Design – paragraphs 3.1.11 to 3.1.12	<ul style="list-style-type: none"> The use of a Design Panel Review on Major Developments: The Brent Design Guide SPD1 (November 2018) states that where applications raise more complex issues, design review by a panel of experts is likely to be recommended and that weight will be given to comments from the design review process. Whilst this is welcomed, we would request that where a design panel process is required by the Council e.g. CABE Design Review Panel, the panel members are properly briefed on the background to the Wembley Park Masterplan to ensure that there is a wider appreciation of how the specific proposals fit within the overall 	<p>LBB Response: Design panel: Agree that the better informed the panel is, the more relevant their input will be. This relies on them reading material supplied.</p> <p>Tall buildings: Noted. The tall buildings strategy has been reviewed on the basis of comments received.</p>

		<p>masterplan vision. In the past this has not been the case and the panels comments have been of limited relevance.</p> <ul style="list-style-type: none"> We support the need to identify where tall buildings are appropriate but are concerned that the Tall Buildings Strategy is unsound in its current form – please refer to our comments on Policy BD1: Tall Buildings in Brent. 	<p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Design Review Panel (para 3.11 previously 3.1.11): No further comment. Tall Buildings (para 3.12 previously 3.1.12): We continue to support the need to identify locations for tall buildings and the acceptance that growth areas are considered suitable locations for these. The tall building strategy has been considerably revised and we now consider it provides a sound evidence base to support the Local Plan’s strategy for tall buildings.
18	Housing paragraph 3.1.15	<ul style="list-style-type: none"> We support the challenge to meet and exceed the adopted local plan housing target and recognise that LBB are in discussion with the GLA on LBB’s future housing target. We object to LBB seeking to impose a preferred mix on private and intermediate housing – please refer to our comments on Policy BH6 (Housing Size and Mix) on pages 16/17. Policy BH6 is not consistent with H12 of the draft London Plan and should therefore be deleted. We consider that seeking to impose the Council’s preferred mix on private and intermediate housing will have a significant impact upon the viability of schemes and this impact has not yet been sufficiently tested. 	<p>LBB Response: No change</p> <p>Officer response: Noted. The desire to address identified needs for Brent is balanced against the need to encourage new housing development. The Council considers it has taken a proportionate response.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Housing Target: We note the EIP Panel recommendations in relation to the London Plan housing target and await the Mayor’s response to these and how this will be reflected in the final Brent Local Plan. Housing Mix: We consider the requirements for a defined housing size and mix for private and intermediate housing are unsound. See our detailed comments in relation to Policy BH6 below on page 21.
19	Social Infrastructure paragraph 3.1.17	<ul style="list-style-type: none"> This paragraph should highlight that whilst there has been extensive investment in school capacity as well as changing child yield calculations which have reduced demand for new school places in certain locations within the borough, this position will be annually monitored by LBB particularly in growth areas such as Wembley where the current surplus will be taken up in the short term. 	<p>LBB Response: No change</p> <p>Officer response: This is reflected in paragraph 3.1.7. Schools will not be promoted by the Council where there is no specific need for them. Capacity and need to monitor before new schools built.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> This paragraph is considered to be unsound as it does not effectively plan for primary school places in the Borough. Objection maintained unless suggested change made. <p>Paragraph 3.17 states there is no need for additional primary schools in the short to medium term however Policy BP1 (section n) states that a new school will be provided at the York House car park site in Wembley Park. This appears inconsistent with Paragraph 3.17. Furthermore, in November 2019 a Schools Places Cabinet Report stated that the York House Primary School will be required by September 2023. Suggested change to Paragraph 3.17 below:</p>

			<p>“There has been extensive investment in school capacity recently which has resulted in sufficient primary school places available for the short to medium term. <u>However, to support new residential development, current projections indicate a new primary school will be required in Wembley Park by 2023.</u>”</p>
20	Economy paragraph 3.1.23	<ul style="list-style-type: none"> We support the challenge to better meeting Brent’s shopping needs locally within the borough by improving its town centres. However, we consider that policies should not seek to impose overly restrictive controls on the uses that are permitted in town centres to ensure town centres can be flexible to the very dynamic retail market and remain viable and vital. Please refer to our comments on Policies BE4 and BCH4. 	<p>LBB Response: No change</p> <p>Agreed. The Plan seeks to ensure that there is sufficient policy support to allow additional retail where required, but also allow for alternative uses to support town centres where appropriate.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments.
4. Spatial Vision and Good Growth			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
27	Strong and Inclusive Communities	<ul style="list-style-type: none"> We support the ambition to build on Brent’s status as London Borough of Culture 2020 by supporting inclusivity. 	<p>LBB Response: No response needed.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
27	Making the Best Use of Land	<ul style="list-style-type: none"> We support higher density development in Brent’s town centres and in areas with good accessibility to public transport / PTAL ratings. 	<p>LBB Response: No response needed.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
28	Delivering Homes to Meet Brent’s Needs	<ul style="list-style-type: none"> We recognise the figure of 1950 homes/year is 1,000 a year below the London Plan 10 year target and that LBB are objecting to Draft London Plan housing targets for Brent. We consider that bullet point no. 2 should refer to all affordable tenures, including London Living Rent and Affordable Rent, to ensure Brent retains diverse and inclusive communities. We object to LBB seeking to impose a preferred mix on private and intermediate housing – please refer to our comments on Policy BH6 (Housing Size and Mix). Policy BH6 is not consistent with H12 of the draft London Plan and should therefore be deleted. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change.</p> <p>Officer response: The point identifies the priority tenure to meet needs. The Council is not imposing a preferred mix, it is seeking to ensure a reasonable proportion (25%) of 3 bed+ homes are provided, when the market currently prefers to provide 1 and 2 bed and needs have been identified at >65%.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Delivering Homes to Meet Brent’s Needs (now page 30) - The drafting of bullet point C is considered to be unsound as it has not been positively prepared to meet objectively assessed development needs nor is it effective (deliverable) or consistent with national policy. See comments and suggested changes in relation to Policy BH6 below on page 21.
Policy DMP1			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
28	DMP1	<ul style="list-style-type: none"> We note that this policy is drafted as per the current adopted policy DMP1, however, it is considered that the first bullet point in this policy should be applied appropriately taking into account other policies in the plan, particularly in the Growth Areas. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change</p> <p>Officer response: Noted. Greater clarity is provided in site specific and place policies.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
30	4.1.16	<ul style="list-style-type: none"> We consider that a more detailed analysis is required to ensure that the development capacities in Growth Areas and site allocations are as accurate as possible. Draft London Plan Policy D6 (Optimising Housing Density) states that it is important to ensure that the capacity of allocated sites is correctly identified so that improvements to infrastructure capacity can be assessed and planned. 	<p>LBB Response: No change.</p> <p>Officer response: The Council has made reasonable assumptions of capacity using a number of mechanisms, e.g. standard densities, knowledge of comparable site development, detailed designs, estimates provided by developers, etc. It is</p>

			accepted however that until tested through more detailed design associated with an application that assumptions are estimates. The best information available at the time will be used.
			<p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
Preferred Policy Option BP1 Central and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
33	5.1.3	<ul style="list-style-type: none"> Reference is made within this paragraph to the park being 3 hectares. Elsewhere in the Local Plan the park is referred to as 7 acres and we would suggest 7 acres is used throughout for consistency with permission 15/5550. 	<p>LBB Response: Change made:</p> <p>Change size of park from 3 hectares to 7 acres for consistency throughout the document.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
35	Figure 8	<ul style="list-style-type: none"> On Figure 8 the town centre is marked as being located north of Wembley Park tube, however, this is understood to be the Wembley Park District Centre. The base map should also be updated to show the completed Quintain buildings. The VDC & Careys car park site should be removed from the designation of Key Employment Sites 	<p>LBB Response: Change made:</p> <p>Amend Figure 8 to reflect updated development position and updated SIL and LSIS boundary for key employment sites.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Further clarification required: We recognise Figure 9 (previously Figure 8) has been updated but the changes are unclear due to the low resolution of the image. The designated Wembley Town Centre is also shown in two different locations on Figure 9 (the LDO shopping Centre) and Figure 30 (Wembley High Road).
36	BP1 Central	<ul style="list-style-type: none"> LBB must ensure that any of the key objectives of the Wembley AAP that are still relevant or have not been delivered are carried forward into the new Local Plan if the Wembley AAP is to be deleted following adoption of the Local Plan. The following comments are made in respect of parts (a) to (u) of the policy: Part b – support. Part c – this part of the policy should specifically refer to removal of the Pedway which is a key element in improving the stadium approach from Wembley Park station. Part d – we support the increased housing figure and suggest the text is revised to refer to this as a minimum figure. Part e – we consider that intensification should not just be at Wembley Park Station but should also be supported where PTAL levels are high or are predicted to be improved through public transport improvements that are being delivered and suggest the text is revised to refer to this approach. Part f – we support the expansion of Wembley town centre Part g – we consider the text should be revised to clarify that this increase in floorspace is in addition to the current approvals secured under the various Quintain consents at Wembley Park. We propose that when Wembley and Wembley Park town centres are considered together, they already meet the tests to be identified as a Metropolitan Centre. Part i – we support the aspiration to diversify the town centre offer. Part k – we consider the policy is not clear on what is meant by a ‘greater proportion’ of non-residential uses. It is assumed however that this is referencing a comparison to the previous planning policies for the area in the WAAP. The 	<p>LBB Response: Some changes made:</p> <p>Amend the policy criterion: g) insert after floorspace "in addition to that already existing and consented" h) insert after one "additional" k) replace with "Introducing a greater proportion of employment floorspace in new mixed-use developments on Watkin Road and First Way to the east of the Stadium than allocated in the Wembley Area Action Plan"</p> <p>Amend paragraph 5.1.34 to incorporate the planned timetable for delivery of North End Road and First Way improvements to commence in 2020.</p> <p>Officer response:</p> <p>b. Noted. c. The current wording is broad and potentially encompasses a variety of improvements over the period of the Plan. On reflection paragraph 5.1.16 could give more information/ reference to schemes to improve the pedestrian experience improve the public realm. d. Noted. The current wording "over" implies more than rather than a minimum and is considered appropriate reflecting known opportunities, but also the need to accommodate a wider range of uses than just residential e. It is considered that the Plan takes adequate account of opportunities for intensification such as allocations, identifying where tall buildings are appropriate and specific site allocations.</p>

		<p>site is currently 100% non-residential and therefore it is not possible to seek a greater proportion than currently provided. This wording also appears to contradict the increased residential targets for this site within BCSA6 and statement in paragraph 5.1.19.</p> <ul style="list-style-type: none"> • Part p – we would suggest consistent reference to 7 acre park is used throughout for consistency with permission 15/5550. • Part q – we support this part of the policy but consider it should reference 2020 timetable for delivery. • Part r – we support this part of the policy but consider it should reference 2020 timetable for delivery. • Please refer to Appendix 1 for proposed text changes. 	<p>f. Noted. g. Agreed, amend policy wording to reflect this is additional capacity over that which already exists/ is consented. i. Noted. k. This means the allocations incorporating a requirement for a greater proportion of employment use than was previously the case, reflecting Brent's status as a 'provide capacity' borough in the draft London Plan. The wording could be improved for the sake of clarity. p. Noted - current policy reference is considered appropriate. Q and R. Noted. Amend paragraph 5.1.34 to be more reflective of timescale for delivery.</p> <hr/> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> • Part E – Objection maintained unless suggested change is made. This policy does not meet the test of soundness as it is not consistent with national policy. <p>Whilst the area around Wembley Park Station has a high PTAL rating, the area is primarily low rise and suburban in character and a policy requirement for high density focused in this area may not meet other policy objectives in the plan.</p> <p>In accordance with Policy D6 of the new Draft London Plan, development proposals must make the most efficient use of land, particularly in areas with a good PTAL rating. Therefore, we consider that intensification should not just be at Wembley Park Station but should also be supported where PTAL levels are high (PTAL 4 or above) or are predicted to be improved through public transport improvements that are being delivered and suggest the text is revised to refer to this approach as suggested below:</p> <p><u>“Subject to meeting other policy objectives in this plan intensification and higher residential densities will be supported around Wembley Park Station and surrounding areas where PTAL levels are high or there are proposals to improve them, where it can be demonstrated development would take advantage of the area’s good access to public transport.”</u></p> <ul style="list-style-type: none"> • Part L – We object to the requirement for increasing supply of modern affordable workplace developments unless viability is fully taken into account to ensure the policy meets the test of soundness for effective planning. Suggested amendment to part L below: <p><u>“Where viable, increasing the supply of modern affordable workplace developments for the arts and creative industries.”</u></p>
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			<ul style="list-style-type: none"> Part N - Objection maintained unless suggested change is made as it does not meet the test of soundness for effective planning as the policy assumes the school will be delivered. Whilst we support the reference to providing a primary school on the York House site, there needs to be a caveat in place should the Department for Education not deliver the school. Suggested amendment to part n below: <u>“Providing a new primary school on the York House car park site by 2023, subject to child yield projections and school capacity requirements being monitored on an annual basis”.</u>
38	5.1.22	<ul style="list-style-type: none"> We disagree with the wording of this paragraph. Whilst an element of retail is proposed as part of the Fulton Quarter Planning Application (ref:17/3059), due to the form and nature of the proposed masterplan it will not expand upon the current provision provided on site. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change.</p> <p>Officer response: Noted. The paragraph takes account of the outputs of the retail and leisure needs assessment and identifies the opportunity that this site could deliver.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Objection maintained to Paragraph 5.1.25 (previously 5.1.22). See detailed comments in relation to Policy BCSA2 below on page 10. This paragraph does not meet the test of soundness for effective planning because it is not deliverable based on the masterplan for the redevelopment of Stadium Retail Park. The masterplan, which is supported by the Council, provides for a permeable and open pedestrian environment which could not be delivered if the site is required to re-provide or expand the current retail warehouse uses. <p>Whilst the word ‘ideally’ has been included regarding expanding retail floor space in Wembley Stadium Retail Park, the text appears to have been prepared with no recognition of the current planning application (application ref: 17/3059) which is supported by Brent Council.</p>
38	5.1.23	<ul style="list-style-type: none"> We would query the relationship between Wembley and Wembley Park town centre areas which has emerged over the past few years. We consider that as these centres have a contiguous boundary, they effectively operate as a single centre and so should be combined into one. Related to this, we would suggest that when considered jointly, the Wembley and Wembley Park town centre areas meet the tests to be identified as a Metropolitan Town Centre in the London Plan. This matter should be raised with the GLA at the earliest opportunity in order for Wembley to be re-designated. 	<p>LBB Response: No change</p> <p>Officer response: This is the longer term aspiration of the Council too. Currently however there is a gap between the centres caused by a lack of continuous active frontage between the LDO and Wembley Triangle and a weak offer between the Triangle and the area to Cecil Avenue which means the centres effectively operate as two different entities. This plan's policies and development proposals should overcome this, so that in the coming years the contiguous nature of the wider centre is clear.</p>

			<p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Paragraph 5.1.26: The identification of Wembley having the potential to achieve Metropolitan status is welcomed and supported. The gaps in between the two centres are reducing due to the new developments surrounding White Horse Bridge and Wembley Triangle, including plot SW03a, Mahatma Gandhi House and Premier Inn which all provide town centre uses at ground floor level. <p>Quintain will continue to work with LBB on promoting the Metropolitan status through the London Plan process.</p>
39	5.1.29	<ul style="list-style-type: none"> We consider that this paragraph should be updated to reflect the fact that Quintain has recently delivered and opened a brand new community hall to replace an existing temporary facility (Yellow Pavilion) which since its opening has been well used and supported for several years. We object to the statement that the redevelopment of Fountain Studios consolidates the cultural offer. We suggest this sentence is removed as no significant cultural facilities are proposed within the Fulton Quarter masterplan. However, the cultural assets of Wembley Park are being enhanced and improved elsewhere in line with the Wembley Park Masterplan (Plot W12, Boxpark and SSE Arena). Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: Change made:</p> <p>5.1.33 Yellow pavilion community facility mentioned.</p> <p>Add: 'The provision of Boxpark, Troubadour theatre plus the development of Plot W12 which has permission for further cultural facilities provides the opportunity to further consolidate the cultural offer of the area in the longer term as part of the place making strategy'.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Paragraph 5.1.33: The recognition of the impact Troubadour Theatre and Boxpark have on the vitality and vibrancy of Wembley is welcomed, however the text should recognise that these are meanwhile leisure uses that will be replaced by permanent uses in due course.
39	Other Policy Guidance	<ul style="list-style-type: none"> We consider this list should also refer to the original Stage 1 masterplan (ref: 03/3200) and the South West Lands Masterplan (ref: 14/4931). Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: Change made:</p> <p>Add reference to South West Lands Masterplan (ref: 14/4931) in Other Policy Guidance.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments.
Preferred Policy Options BCSA1-BSCA17 and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments

42	BCSA2 – Stadium Retail Park & Fountain Studios	<ul style="list-style-type: none"> We consider the indicative capacity needs a range up to 995 and should refer to potential educational uses. The site does not yet have outline permission. We object to a requirement to ‘replace’ existing retail – the outline application (ref: 17/3059) proposes a level of retail which is considered to be appropriate and viable but as part of the Wembley Park Masterplan Quintain are not looking to replicate the same level or type that is currently on site. We object to the requirement to re-provide the TV studios with a similar sized facility. There is no sound justification for re-provision of the TV studios. Although Quintain have secured a mean-time temporary cultural use in Fountain Studios (which will be open in 2019), they object to having an obligation to provide a replacement for Fountain Studios. The TV studios are out-dated and no longer fit for purpose which is why they closed in 2016. LBB should recognise that, through the Fulton Quarter Masterplan, Quintain have ensured that the Fulton Quarter development does not compromise any future scheme that may come forward on the Crescent House site however Quintain are not in a position to plan both sites ‘as one’ at this stage as the sites are in wholly separate ownerships. The Fulton Quarter Masterplan does have regard to the Crescent House site and will enable a phased and holistic approach to housing delivery and achieve a quicker delivery programme for new homes. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: Change made:</p> <p>Capacity amended to 900 dwellings</p> <p>Re-provision of TV studios removed from policy.</p> <hr/> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> We maintain our objection to the requirement to ‘replace’ existing retail on the site. This requirement does not meet the test of soundness for effective planning and should be deleted. The policy does not acknowledge the current planning application for the redevelopment of the site which removes the outdated ‘retail warehouse’ buildings in order to provide a permeable and welcoming pedestrian environment with open space and active frontages, including retail uses. <p>Whilst retail will be provided within the redevelopment, this will be smaller scale and more reflective of modern day retail needs than the current uses.</p> <p>The wording should be revised as follows:</p> <p>“The existing retail, although is out of town in format and whilst contributing contributes towards retail capacity within a town centre, it does not provide for a welcoming pedestrian environment. As such whilst retail floorspace will be encouraged within redevelopment proposals this should be provided in more appropriate and modern formats given the sites important location within the Wembley Park opportunity area, given the limited opportunities to find new large scale sites to accommodation identified retail needs any development should seek to maximise re-provision of existing floorspace. The opportunity to accommodate convenience retail in particular needs to be considered.”</p> <ul style="list-style-type: none"> We object to Fountain Studios (Use Class B1) being referred to as a ‘cultural asset’. This statement is not justified and therefore does not meet the test of soundness and should be deleted. There is no justification or market demand for the replacement of the studios which were not protected when they were in active use up until 2016 when the operator decided that it was no longer fit for modern day filming practices. Whilst Quintain have now delivered a theatre within the building this is a temporary meanwhile use which will close in 2025. <p>Additional modern cultural assets are planned elsewhere within the Wembley Park masterplan.</p>
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			<p>Suggested change:</p> <p>“The Fountain Studios is a cultural facility, which in the context of Wembley’s identification in the London Plan as a Cultural Area of strategic importance, Brent’s London Borough of Culture 2020 status and the desire to support the evening economy would ideally be replaced with another cultural facility.”</p>
51	BCSA6 – Watkin Road	<ul style="list-style-type: none"> We object to the requirement set out within the design principles for development to step down to the east end of Watkin Road. There are currently no defined height parameters for the sites located to the east and west of the Watkin Road area and therefore to have an arbitrary requirement for the east end to step down seems premature at this stage. This is particularly relevant given that the site located further to the east of Watkin Road (Euro Car Parts) is likely to step up again. The requirement to step down on the east end on Watkin Road could significantly limit the development potential for this site without any defined justification. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: Officer response:</p> <p>Taking account of the adjacent development of BSC4, plus the potential in the longer term for sites to the north east to be developed, it is accepted that the requirement to step down may well reduce the capacity of the site below what in the longer term would have been considered an appropriate amount. As such reference to this will be removed.</p> <p>Change made: Remove the sentence: "Development will step down to the east end of Watkin Road." in the Design Principles section.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Objection maintained. This policy does not meet the test of soundness as it is not justified. The adjacent site to the east (BCAS4) is proposed for redevelopment for residential use and therefore there is no justification for the eastern part of BCSA6 to adopt the agent of change principle. This may only effect the north-eastern part of the site which is adjacent to a continuing industrial use. <p>Suggested amendment to Policy BCSA6:</p> <p>Development in proximity to the <u>north-eastern</u> eastern part must <u>may need to adopt</u> the ‘agent of change’...</p>
54	BCSA8 – Wembley Retail Park	<ul style="list-style-type: none"> The delivery timetable is incorrect. Wembley Retail Park will be completed by 2026. We note an indicative capacity of 2180 is given to the site and that this is based upon assumptions made in the outline permission (ref: 15/5550). Quintain will be optimising the design of this site during 2019 which could deliver additional units over and above the consented figures. Quintain look forward to working with LBB on this exercise. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change</p> <p>Officer response:</p> <p>Clarity on the delivery timetable is welcomed. The capacity on the site identified reflects existing consent parameters, but in any case is identified as indicative. Any proposals to amend the existing consent so that it provides additional capacity on the site will be considered on their merits, but this is not something that the Council is actively encouraging given what is already an efficient use of the site and the importance of maintaining an appropriate setting for what will be an open space of strategic importance within the Wembley Park development.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> The Officers comments are noted and we will continue to work with LBB during the course of the adoption of the Local Plan to bring forward the North East Lands development. It is considered that additional units could be deliverable within the site whilst respecting and enhancing the setting of the new park.

60	BCSA11 – CNWL	<ul style="list-style-type: none"> We consider that the indicative capacity of 100 units is too low for such a prime 'gate way' site at the apex of the Wembley Park masterplan area. A site in this location, with a PTAL rating of 6a should be seeking to maximise densities in accordance with the London Plan. It is considered that an indicative capacity of 275 units should be included within the plan for this site. Draft London Plan Policy D6 (Optimising Housing Density) states that development proposals must make the most efficient use of land and be designed at the optimum density (taking into account evaluation criteria). Policy D6 also states that boroughs should ensure that the capacity of allocated sites is correctly identified so that improvements to infrastructure capacity can be assessed and planned in infrastructure delivery plans or programmes. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: Officer response:</p> <p>The indicative figure was provided on the basis of not wanting to over-inflate potential residential dwelling numbers from allocations, bearing in mind the lack of certainty about where the CNWL would be relocated to, as many of these potential sites are also assumed to be residential. However, this assumption can perhaps be better incorporated into the housing trajectory table that supports the Plan. As such the indicative figure will be revised in the allocation text to similar density of BCSA5.</p> <p>Change made: Revise the indicative dwellings figure to 155 dwellings.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Whilst the figure has been increased from 100 to 155 dwellings, we maintain our objection to the indicative figure of 155 dwellings as it does not meet the test of soundness for effective planning and is not consistent with national policy. <p>The comparison of the site's potential density to BCSA5 (Olympic Office Centre) is not appropriate for site BCSA11 (CNWL). BCSA11 has the highest PTAL rating of 6a whereas BCSA5 has a PTAL rating of 4/5. Furthermore, as previously stated, a site in this 'gateway' location, adjacent to Wembley Park tube station should be seeking to maximise densities in accordance with the London Plan.</p> <p>This designation is not consistent with Policy BP1(e) of the Regulation 19 Local Plan or Policy D6 'optimising housing density' of the new Draft London Plan which states that intensification and higher residential densities will be supported where development would take advantage of the area's good access to public transport.</p> <p>Suggested amendment to indicative dwellings: <u>275 dwellings</u></p>
65	Figure 9	<ul style="list-style-type: none"> This should include Plot W12 (ref: 15/3599) 	<p>LBB Response: Change made:</p> <p>Add to Figure 9 site W12 comprising 1610sqm of and/or A1-A4/B1/D1 and D2 uses.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
65	Figure 10	<ul style="list-style-type: none"> The W03 permission is 03/3200 and the plot is delivering 340 units. W06 is expected to complete Spring 2020. NW09 should be referred to as NW09/10 and will deliver approx. 396 units. NW10/11 should be referred to as NW11 and will deliver approx. 150 units. E03 a/b should be referred to as E03. Figure 10 should include Plot E05 (ref: 17/3021) which is delivering 458 units. 	<p>LBB Response: Changes made:</p> <p>Update Figure 10:</p> <ul style="list-style-type: none"> W03 permission reference to 03/3200 delivering 340 dwellings. W06 completion Spring 2020. Amend NW09 to NW09/10 delivering 396 dwellings. NW10/11 amended to NW11 delivering 150 dwellings. E03 a/b amended to E03. Include Plot E05 (ref: 17/3021) which is delivering 458 units. <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments

Preferred Policy Option BP2 East and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
69	5.2.6	<ul style="list-style-type: none"> We consider that this paragraph should be amended as whilst Neasden Station is the only underground station located within the East Place, it should be recognised that Dollis Hill Station is immediately adjacent to the East Place boundary and therefore has a significant beneficial impact on the PTAL rating for this part of the East Place. 	<p>LBB Response: Change made:</p> <p>Amend paragraph 5.2.6. Add 2nd sentence. "In addition Dollis Hill underground improves public transport accessibility to the south east part of the East Place."</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
71	BP2 East	<ul style="list-style-type: none"> We strongly support the inclusion of the Neasden Stations Growth area as a focus for housing and employment to be provided in tall buildings as set out within the vision. The following comments are made in respect of parts (a) to (w) of the policy: Part b – we object to this part of the policy and consider the limit of 36m/12 storeys is too conservative and prescriptive in these locations based on current evidence. The policy should be more flexible to allow for greater height to come forward where it can be demonstrated to be acceptable in terms of townscape and visual impact. The NSGA is very limited in terms of heritage or townscape constraints and is a highly sustainable and accessible site (currently PTAL 4) and this will be further enhanced in the coming years with the introduction of the West London Orbital Link. Therefore, the Local Plan should look to maximise site densities in this location. Furthermore, Draft London Plan Policy D6 (Optimising Housing Density) states that development proposals must make the most efficient use of land and be designed at the optimum density (taking into account evaluation criteria). Part p – whilst we strongly support this part of the policy, as noted above, we object to part b of this policy as well as Policy BD1 as we consider that these will restrict the redevelopment of the College of North West London sites as currently identified in the Local plan and will limit the ability to achieve the aims defined by this part of the policy. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: Change made:</p> <p>The policy has been amended to not place a maximum height on development prior to its more detailed consideration at the masterplanning stage or when more detailed townscape / views analysis is undertaken.</p> <p>Officer response: Noted. The Council has taken account of the Tall Buildings strategy as well as comments/ information supplied in response to consultation. At this stage it does not consider that this location is appropriate for very tall buildings and is content with the heights in this location identified on the policies map. The Council will consider this element, but has to also consider the appropriateness of the height of buildings, particularly those well in excess of 10 storeys.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> We support the revised wording within Policy BP2 which, when read in conjunction with the Tall Buildings Strategy, is now positively prepared and justified. <p>Whilst further masterplanning and design work will be needed to confirm precise heights, BP2 and the Tall Buildings Strategy now provide a positive and proactive framework to ensure the Neasden Growth Area can deliver the identified housing numbers.</p>
72	5.2.14	<ul style="list-style-type: none"> We support the Growth Areas being recognised as suitable locations for radical change however this aspiration will be restricted by the imposition of an arbitrary/prescriptive 12 storey height limit set by Policy BP2 East. 	<p>LBB Response: No change.</p> <p>Officer response: The Council considers the 12 storeys as an appropriate starting point on the basis of its analysis as set out in the supporting Tall Buildings Strategy.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> It is noted that the Regulation 19 version now refers to a tall building as 10 storeys or more instead of 12 storeys. No comments have been provided by officers to explain this change.
72	5.2.16	<ul style="list-style-type: none"> We would comment that any masterplan exercise must involve stakeholders, land owners and developers from the very start. . 	<p>LBB Response: No change.</p> <p>Officer response: Noted. This is good practice, taking forward such a masterplan without landowner/ developer support is likely to be counter-productive.</p>

			<p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Maintain objection unless Paragraph 5.1.16 is amended to include the suggested wording: <p><u>“The masterplanning process will involve key stakeholders, landowners and developers to help shape the masterplan from conception to completion through a series of workshops and consultations.”</u></p> <p>This will ensure the Local Plan meets the test of soundness for effective planning, ensuring the masterplan is deliverable by the parties involved.</p>
73	5.2.18	<ul style="list-style-type: none"> We would suggest that the timetable for the adoption of SPDs will need to progress very soon and should not delay development proposals from coming forward provided they can clearly and robustly demonstrate how they would fit into the emerging masterplan. 	<p>LBB Response: No change.</p> <p>Officer response: Noted. The paragraph indicates that it might be possible for development to progress prior to completion of a masterplan.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
73	5.2.22	<ul style="list-style-type: none"> We would highlight that whilst the delivery of community facilities in the Growth Areas is fully recognised, the requirement for any development proposals to deliver these will need to be reflected in the Council's CIL 123 List and where necessary their delivery be treated as payment in kind. 	<p>LBB Response: Noted. No change.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
74	5.2.26	<ul style="list-style-type: none"> We strongly support the aspirations in this paragraph to ensure the College of North West London (“CNWL”) has the facilities to ensure it remains an important educational asset for the residents of Brent and further afield. However, we consider that restricting the redevelopment of their current sites as currently proposed within the Local Plan policies BP2 East and BD1 will restrain the ability to achieve these aims and deliver the facilities required by CNWL. 	<p>LBB Response: No change.</p> <p>Officer response: The Council will consider Quintain's representations and do the best that it can from a planning policy perspective to support CNWL's relocation plans. Nevertheless, it has to consider the overall success of Neasden Growth Area and what the college site should reasonably be expected to deliver to support a balanced and mixed community with associated supporting uses and social infrastructure. Neasden is not Wembley Park and as such expectations on the heights of buildings that can be achieved/ supported in this area should take account of existing character and guidance provided in the Tall Buildings Strategy/ heights on the policies maps.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
Preferred Policy Options BEGA1-BEGA2 and BESA1-BESA4 and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments

75	BEGA1 – Neasden Stations Growth Area	<ul style="list-style-type: none"> We note that the allocation covers a very wide area and very diverse sites. We consider it should be split into separate allocations to give more confidence and clarity on delivery, uses and density. We would request that any masterplan must involve all stakeholders from the start of the process - setting of parameters and principles. In addition, we consider that the masterplan should not be overly prescriptive but should leave this to come forward through development proposals. We are concerned at the statement that no redevelopment will be permitted in the Neasden Stations Growth Area until a masterplan is agreed. Whilst we understand the council is looking to start this process in 2019, there is currently no guarantee that this will happen and if there are any delays in the production of the masterplan this will hinder the ability to redevelop the site and relocate the college. We consider the provision of a Decentralised Energy Centre (DEC) will be difficult to deliver with only 2000 residential units particularly given the uncertainty over the phasing of sites coming forward. Early work should be undertaken as part of the Masterplanning exercise on this requirement to demonstrate if it is viable and if not, feasible alternatives should be put forward. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change</p> <p>Officer response:</p> <p>Splitting the site up at this stage is not considered appropriate as the Council wishes to see a comprehensive plan for its redevelopment. The Council understands the need for the CNWL site to progress and its role in supporting the college's wider plans which the Council is very supportive of in principle. Should it have to, in advance of a masterplan being adopted the Council will balance the potential need to make a decision related to a planning application on this site up against a wider understanding of its contribution to a successful Neasden Growth Area and the benefits for Wembley and educational provision within the borough. It is recognised that in relation to energy, the parameters can change quickly. Should the developer of the CNWL site not consider it feasible to be part of a district heating network, then this should be set out in the energy statement supporting any application, consistent with the London Plan's policies on this matter.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Maintain objection to Policy BEGA1 (page 90-92) which does not meet the test of soundness for effective planning. As previously stated, the allocation covers a very wide and diverse area with different land ownerships and aspirations. Whilst any future masterplan can cover the whole area, it is considered the site allocation should split into several allocations so it can be more focused on specific sites and provide greater clarity on redevelopment and delivery timescales. <p>The policy also needs to refer to all stakeholders being involved in the masterplanning process as previously stated. Suggested change below:</p> <p><u>"The masterplanning process will involve key stakeholders, landowners and developers to help shape the masterplan from conception to completion through a series of workshops."</u></p>
Preferred Policy Options BSWA1-BSWA16 and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
238	BSWSA8 - Wembley High Road	<ul style="list-style-type: none"> The section on 'Planning Considerations' should state that development proposals for this site must <u>not</u> prevent the Wembley Triangle highway improvements coming forward as these form an integral part of the Western Corridor Study and alleviate road closures and egress times on event days. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: Change made:</p> <p>Amend BSWSA8 planning considerations with an addition point: "Landowners and site developers are encouraged to work together to ensure masterplan delivery as this is more likely to happen".</p> <p>Amend BSWSA8 Risks with an addition point: "Fragmented nature of land ownership could increase time taken to deliver and if not properly managed a piecemeal rather than comprehensive approach to redevelopment, resulting in a disjointed environment and inadequate infrastructure."</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> We object to the removal of references to the Wembley Triangle highway improvements from the infrastructure section on policy BSWSA8 as this does not meet the test of soundness for being positively prepared.

			The removal of the works from BSWSA8 will significantly weaken the Council's ability to deliver these improvements and the requirement to safeguard land to deliver the works should be included where required.
6.1 Design: Preferred Policy Options BD1-BD2 and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
284	6.2.12- 6.2.13	<ul style="list-style-type: none"> N/A 	<p>LBB Response: N/A</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Whilst the concerns raised by the Council in paragraphs 6.2.12 and 6.2.13 in relation to HMOs are noted however it is considered that where provided in purpose built, well managed and high quality build to rent developments such as Wembley Park HMOs play a vital part of the in the local housing Market. We consider local plan should make this distinction which will reassure build to rent developers of the council's position on HMOs in such developments. <p>The wording relating to the Council's proposed Article 4 Direction to remove C4 permitted development rights is not considered necessary or relevant to the Local Plan and should therefore be deleted.</p> <p>Suggested amendments:</p> <p>6.2.12 The cost, limited availability of housing and flexibility of development rights has resulted in many Brent homes becoming houses in multiple occupation (HMO); properties shared by two or more households. Whilst they do <u>Where such accommodation is purpose built, well managed and high quality it provides a valuable role in meeting housing need and will be supported. However where this is not the case their concentration can</u> sometimes have adverse impacts on neighbours. This includes; poor maintenance of properties and waste management, overcrowding, increased anti-social behaviour, pressure on parking and other social infrastructure. Increased permitted development rights together with lack of housing licensing requirements for smaller HMOs until quite recently has resulted in the council having a limited ability to address this matter. There are now approximately 16,000 HMOs in Brent.</p> <p>6.2.13 The council has introduced licensing for all HMOs with 3 or more people forming two or more households. These changes point to likely greater control of quality outside of planning, helping to reduce potential for adverse impact on neighbours and tenants. Nevertheless, the council is likely to go through the process of removing permitted development rights for change of use to HMOs to come into effect in 2020.</p>
246	Policy BD1: Tall Buildings in Brent	<ul style="list-style-type: none"> We object to this policy. We do not agree with the local definition of a tall building and do not consider that the policy should be setting maximums without a more robust evidence base in place which includes full view analysis and townscape/heritage assessments. With this more detailed assessment, the policy can include the criteria against which applications which include tall buildings will be assessed. 	<p>LBB Response: Change made:</p> <p>The Tall Building Strategy (TBS) now features expanded analysis for the search areas. The design criteria in the TBS for tall buildings are now expanded. These will be included in the Local Plan policy justification.</p> <p>Officer response:</p>

		<ul style="list-style-type: none"> The policy refers to the areas on the proposals map where tall buildings will be acceptable. However, we understand that the proposals map is yet to be published and therefore reserve our comments on this part of the policy. We consider that the policy wording is unclear as it refers to 'appropriate levels' but does not define what 'appropriate levels' are. We object to the draft Tall Buildings Strategy – this requires further work if it is to be used to inform Local Plan Policy BD1 as it is not currently considered to be a sound evidence base. A review of the draft Tall Buildings Strategy has been undertaken by Tavernor Consulting on behalf of Quintain and is attached at Appendix 2 to this table. The review concludes as follows: <ul style="list-style-type: none"> A views assessment is recommended to guide tall development in the area and inform the stipulation of appropriate heights. This would include an understanding of potential impacts on the skyline, as perceived at certain key points, and would provide an opportunity to shape the future skyline as part of a plan-led tall building strategy. Ideally this would be borough wide, but could also be undertaken by area. The view locations and visual strategy could then be used in the assessment of tall development applications coming forward. A townscape and heritage assessment is also recommended to be undertaken of the areas identified where height may be possible (due to PTAL ratings and visual impact analysis). Such an assessment would identify key junctions or other townscape 'nodes', potential means of improving townscape character and a sense of place, heritage assets which should be of key consideration. The analysis in the Draft Strategy demonstrates that the methodology and criteria of a tall building strategy must inevitably be applied flexibly and will vary from location to location. Consequently, it is recommended that, within areas designated as potentially suitable for tall development, that heights are considered against key principles of development set out for each Area. The Draft Strategy describes "areas of two storey housing" as being "the most common character within Brent" (p.5). It is also noted that the Local Plan requires the scale and character of parts of Brent to change if more housing is to be created. The Plan acknowledges that this will result in areas "with a different character to the adjoining suburban areas" (3.1.12). At present, planning policy encourages that this need is met by concentrating new development in locations of least sensitivity (e.g. in terms of heritage, views, open space) and where there is an existing or emerging appropriate level of amenity to support greater density (e.g. public transport, but also shops, services, community networks). In Brent, like the rest of London, some of these appropriate locations may also be characterised by an existing lower scale of development. In its present form, the Draft Strategy does not appear to allow for this change of scale and character in certain appropriate places. The appropriate heights identified, particularly in designated Growth Areas, also appear to lack a clear urban rationale. <ul style="list-style-type: none"> Please refer to Appendix 1 for proposed text changes. 	<p>The tall building definition is already Brent's adopted policy and matches that of the London Plan and is considered the most useful simple definition. The Tall Building Strategy (TBS) now includes further analysis and design criteria. These criteria will be included in the Local Plan policy justification. The appropriate heights are outlined in the TBS. i. 3d views are now included for each search area. ii. The strategy is to cluster tall buildings together to minimise impact and harm. Spreading them out on junctions would increase the visual impact instead of retain or improve townscape character and sense of place. iii. Appropriate heights are identified for each Tall Building Zone and tall building applications will be considered against the expanded design criteria. iv. The TBS has identified the most appropriate areas for tall building clusters, which will allow for changes of scale and character and will by definition be different in character to the areas surrounding it.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> The Local Plan Policy Map key identifies a 'Core' and 'Pinnacle' zone for tall buildings but shows these designations as the same annotation (blue dashed line). It is not therefore clear if these are two different designations? The pinnacle locations are also not shown in the Tall Building Strategy. <p>We suggest the 'Pinnacle' designation is either removed and dealt with at Masterplanning stage or that the Tall Buildings Strategy is updated to include the Pinnacle location which can then be shown on the proposals map.</p> <ul style="list-style-type: none"> We continue to support the need to identify locations for tall buildings and the acceptance that growth areas are considered suitable locations for these. The tall building strategy has been considerably revised and, subject to the above comment being addressed, we now consider it provides a sound evidence base to support the Local Plan's strategy for tall buildings.
6.2 Housing: Preferred Policy Options BH1-BH13 and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
253	6.20.19	<ul style="list-style-type: none"> We consider that a full review of the student bed space figures needs to be undertaken by LBB to inform the position in the Local Plan. Quintain have a number of student consents which have not been built out and this, along with the higher number of residential units being delivered at Wembley Park will have an impact upon the student bed space figures. The paragraph is unclear as it is Policy WEM23 of the WAAP which limits provision to 20% of the Wembley Growth Area, however this policy is to be 	<p>LBB Response: Change made: Amend Policy BH7 to remove references to student accommodation which can be addressed through draft London Plan policy H17.</p> <p>Officer response: This work is being done when considering new applications. This is a fair point and it is agreed the wording could be improved. However taking account of comments elsewhere the 20% requirement has been removed from policy.</p>

		deleted. Policy BH7 states that proposals for student accommodation will be supported where the development will not lead to an over concentration in that area but defines this as no more than 20% of the proposed population of Growth Areas being students. This wording could imply 20% of the cumulative population of all the Growth Areas.	<p>Taking account of emerging London Plan policy on student accommodation policy BH7 will be amended to remove reference to the threshold and other aspects such as named institutions prior to permission.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
255	Policy BH1: Increasing housing supply in Brent	<ul style="list-style-type: none"> It is noted that this Policy is not consistent with London Plan Target nor the OAN methodology. 	<p>LBB Response: No change</p> <p>Officer response:</p> <p>The Council does not regard the draft London Plan target as achievable due to the lack of evidence to support the very large increase in small housing sites delivery that it identifies. OAN is the starting point for a delivery target, the likely availability of sites to deliver homes to meet the need is the largest determinant of the achievable target that can be set. The Council has clearly identified the capacity of the sites it considers appropriate. If it can be shown that sites it has not considered can reasonably provide additional capacity for homes, then these will be identified and added to the deliverable target.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
256	Policy BH2: Priority areas for additional housing provision within Brent	<ul style="list-style-type: none"> We object to the second half of Policy BH2 and consider that it should be revised. Having to re-provide the same amount of non-residential floorspace will significantly reduce the viability of development and therefore impact upon the number of sites that come forward for housing. It will also impact affordable housing targets and other policy requirements within the plan and the cumulative impact on viability of this and other policies needs to be fully tested and understood by LBB. We understand that viability evidence is being produced and consider this should be made available for review at the earliest opportunity. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response:</p> <p>Officer comment: No change</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Maintain objection to policy BH2 unless deleted or amended as suggested below. <p>The second half of this policy does not meet the test of soundness for justification. The policy does not currently allow for the impact on viability of re-provision of non-residential floorspace to be properly considered. We consider a new bullet point should be included within the policy which states:</p> <p><u>“c) where this requirement would detrimentally impact upon the viability of the scheme.”</u></p>

	6.2.37	<ul style="list-style-type: none"> We recognise that non-residential uses often play an important role in developments but consider that a scheme does not necessarily need to re-provide the same amount that is lost to achieve vitality and vibrancy. This approach is likely to have the opposite effect as much of the space will remain vacant and/or the policy could prevent some sites from coming forward. 	<p>LBB Response: No change</p> <p>Officer response: The policy is consistent with ensuring that mixed use places are built that not only meet housing need, but also address people's non-residential needs and place making. It will assist in meeting employment, retail and social infrastructure needs. There are sufficient caveats provided in criteria a) and b) to allow for flexibility where it can be shown re-provision is not needed, or the proposed development's benefits without the replacement outweighs its potential loss.</p> <p>Noted. The two exceptions to policy BH2 as listed in criterion A & B will see that re-provision will not be necessary providing it can be demonstrated that it will not be viable.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Maintain objection to Paragraph 6.2.35 which is unsound as it is not considered to be justified to apply the same tests of need/vacancy that are applied to local employment sites to undesignated commercial sites that come forward for redevelopment. <p>Suggested change, delete:</p> <p>"In the case of this policy, where a developer does not propose the re-provision of non-residential uses and where not protected/ required as a result of other policies in the Plan, it will apply similar tests on need/ vacancy as required for local employment sites."</p>
258	6.2.39	<ul style="list-style-type: none"> We consider that unless the non-residential uses are not protected by other policies in the plan this requirement seems to be unnecessary and too restrictive. It will be very difficult for a developer to demonstrate at application stage that there is no demand for re-provision of a use/floorspace that is yet to be built. 	<p>LBB Response: No change</p> <p>Officer response: The Council does not accept this. The approach ensures that the use of sites is considered in the round and that land values are kept realistic so that non-residential uses in particular are not automatically displaced in redevelopments where otherwise their provision would enhance the offer to the community or contribute to a sense of place.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Maintain objection (now para 6.2.33). See comments to paragraph 6.2.35 above.
258	6.2.40	<ul style="list-style-type: none"> We consider that these are very onerous tests to satisfy in order to bring forward a wholly residential scheme. Meeting these requirements is likely to slow down the delivery of residential development in the borough. 	<p>LBB Response: No change</p> <p>Officer response: The Council does not accept this. The approach ensures that the use of sites is considered in the round and that land values are kept realistic so that non-residential uses in particular are not automatically displaced in redevelopments where otherwise their provision would enhance the offer to the community or contribute to a sense of place.</p>

			<p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Maintain objection (now 6.2.36). We consider the very onerous requirements within the text are not justified and therefore not sound. They may prevent many appropriate residential developments from coming forward. In line with our comments on Policy BH2 the paragraph should also refer to viability considerations: <p>Suggested wording:</p> <p>In very exceptional certain circumstances the council might accept wholly residential schemes without the development meeting tests related to need/likely occupation. This might be for instance where an existing use is a 'bad neighbour'/ 'non-conforming' use which is undermining the amenity of an area, <u>or re-provision of such uses is shown to undermine viability of a scheme.</u> In these types of cases the applicant would have to show that the problems could not be addressed through its redesign or suitable conditions attached to a planning permission to overcome those adverse effects.</p>
Q	Policy BH3: Build to rent	<ul style="list-style-type: none"> We support this policy but would suggest changing the wording from 'expected' to 'encouraged' or similar. We consider that the policy should also be expanded to note that the standard housing policies within the Local Plan may be applied differently in relation to Build to Rent developments to reflect the differences that exist between the two tenures. Applicants could then rely upon more detailed guidance provided within the London Plan to demonstrate why they are proposing to diverge from the local policy standards. This would recognise that BTR is not designed to a lesser quality but to a different quality reflective of the product and the market. It will also help BTR developers compete in the housing market with more traditional housing developers thereby increasing housing delivery in the borough. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change</p> <p>Officer response: Encouraged is not considered to be sufficiently robust to creating a change in approach as standard developers are shown in most cases to be able to pay more for sites than build to rent. Whilst understanding the sentiment, the Council is reluctant to encourage divergence from London Plan standards for build to rent homes on a consistent basis. These homes will for many people be their long-term residences, so decreases in design standards compared to those able to purchase/renting affordable homes is not considered appropriate. The Council is clear that it wishes to encourage private sector renting and as such will be willing to consider a differentiation in standards where it can be justified by the developer and weigh this up against other aspects of the quality of development/ opportunities it brings for people to meet their housing needs.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Whilst the officer's comments are noted, we maintain our objection in relation to Policy BH3v and the supporting text which we consider should be expanded to provide additional guidance on how Build to Rent developments will be considered in terms residential amenity and design standards. This would then encourage innovation and differentiation in the Build to Rent sector to come forward. <p>Suggested additional wording to supporting text:</p> <p><u>Build to Rent is a new and evolving sector within the residential market which the Council wish to encourage. The Council will work closely with Build to Rent providers to ensure schemes are delivered that provide high quality residential environments. In exceptional circumstances the Council may be willing to consider a differentiation to the normal residential standards where it can be justified by the developer and balanced against other qualities of the development and meeting housing needs.</u></p>

260	Policy BH5: Affordable housing	<ul style="list-style-type: none"> We consider that the wording of the policy should be amended to state that this is set at 35% by habitable room (not units) in accordance with the London Plan. Whilst the tenures and percentages are included in the policy, we consider that the policy should also include details of the Council's position on the affordable housing mix as this also has a significant bearing on viability. Policy BH5 is only for Non-Build to Rent development. We consider that a policy to set out the affordable housing requirements to secure a fast track route for Build to Rent developments is also required in the Local Plan to give certainty and encourage more build to rent developments in the Borough. This either needs to be included in Policy BH5, added to Policy BH3 or alternatively a bespoke BTR policy included in the plan. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: One change made: Amend Policy H4 to include the affordable split required to allow the fast track approach to build for rent to be undertaken.</p> <p>Include affordable housing size mix within the supporting text.</p> <p>Officer response: The Brent Local Plan does not need to repeat the London Plan which clearly states the percentage is determined by habitable rooms. It is accepted that some clarity will be provided by identifying the affordable housing needs split by size of dwelling. To provide sufficient flexibility for both the Council and applicant, it is proposed that this will be in the supporting text rather than as a specific policy requirement. This will allow changes in site circumstances to be more readily factored into the appropriate sizes agreed.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Object strongly to Policy BH5 which is unreasonable, not effective and is not justified having regard to the viability evidence presented within the Local Plan Viability Assessment. <p>The Affordable Housing fast track route, particularly for Build to Rent developments, is set at an unrealistic and unreasonable level which will significantly reduce the delivery of Build to Rent development in the Borough, which is at odds with Policy BH3. Build to Rent developers will not be able to compete for sites within the Borough with the expectation that they will be required to provide 35% affordable housing at London Living Rent levels in order to secure the fast track route.</p> <p>Please refer to Appendix 1 for our detailed representations on this policy.</p>
262	Policy BH6: Housing size mix	<ul style="list-style-type: none"> We object to this policy and consider it should be deleted for the following reasons. Information on the target of achieving 25% of new homes as family sized accommodation within developments should be set out within the explanatory text of the Local Plan to explain how the Council would encourage schemes to better meet their housing needs. This policy is not consistent with the London Plan Policy H12 which states 'Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.' There is significant older family sized housing stock in Brent which is cheaper and more attractive to families and therefore new family units attract a significantly lower value per sq. ft than 1 and 2 bed units. The provision of smaller units encourages downsizing thereby opening up existing stock to better, more efficient use. We consider that the policy is unclear as to whether it is an overall family housing target that is inclusive of affordable rent units which will have a higher level of family homes (50% in Wembley). This level of 3 bed housing would equate to more than 30% of the overall floorspace of a development and is not consistent with Policy H12 of the London Plan. Such a requirement would have a significant impact on the viability, and 	<p>LBB Response: No change</p> <p>Officer response: The Council has objected to the London Plan H12 policy and disputes the housing mix identified in the London SHMA which over-estimates the need for 1 and 2 bed properties. It considers the inclusion of the 25% within policy as appropriate. The target will apply to all on site including affordable. The viability argument is understood and taken into consideration when the Council balances up the extent to which this policy should prevail for example compared to affordable housing numbers. Notwithstanding Paragraph 122 housing should go some way to meet the needs of the population within the areas which it will be built, otherwise it leads to a further alienation of the population in relation to development proposals.</p>

		<p>therefore the deliverability, of residential developments within the borough and meeting the council's housing targets would potentially be put in jeopardy.</p> <ul style="list-style-type: none"> Not all sites will be suitable for the size and mix of housing sought by Policy BH6. Paragraph 122 of the NPPF advises that planning policies and decisions should support development that makes an efficient use of land taking into account: <ul style="list-style-type: none"> a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; b) local market conditions and viability; c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and e) the importance of securing well-designed, attractive and healthy places. <p>The policy does not make reference to these factors and only allows two exceptions to be demonstrated.</p>	<p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Objection maintained to Policy BH6 which is considered to be unreasonable, not effective and not justified as no evidence has been provided to assess what impact this policy will have on viability. <p>When taken with other policies in this plan, particularly the affordable housing requirements and the requirement to re-provide/replace commercial floorspace within residential developments, the impact on viability of all these policies will be significant.</p> <p>The policy should be redrafted to allow for greater flexibility and recognition of viability and local market conditions, as set out within the NPPF Paragraph 122.</p> <p>Suggested amendment to Policy BH6 (b) set out below:</p> <p>b) Its inclusion would fundamentally undermine the development's <u>viability or the</u> delivery of other Local Plan policies.</p>
296	Policy BH7: Accommodation with shared facilities or additional support	<ul style="list-style-type: none"> N/A 	<p>LBB Response: N/A</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Object to Part e of Policy BH7 where the definition of an over concentration is defined as 4 of 11 adjacent properties. The policy already allows for the Council to approve management standards for such properties in order to limit any impact on neighbours and the Council also has further controls through its Licensing powers under the Housing Act. To apply an arbitrary ratio across the whole borough which will apply to all properties is not considered to be justified. <p>This policy has particular implications for build to rent developments such as Wembley Park where a number of apartments (2 bed and larger) will be let as 'sharer apartments' which may fall within the HMO definition. This provides an important element of the housing market, relieving pressure on conversion of traditional family homes to HMOs, providing 'affordable' accommodation to economically active sectors of the population who are not eligible for Affordable Housing and can be well managed ensuring none of the amenity issues often associated with HMOs occur.</p> <p>We would welcome further conversations with the Council on this policy to try and address our concerns before it is adopted</p>
265	6.2.80	<ul style="list-style-type: none"> We are unclear at the wording of this paragraph which would suggest that affordable housing requirements are not applicable to student accommodation proposals. 	<p>LBB Response: Change made: Amend paragraph 6.2.80 to refer to student affordable housing requirements as set out in the London Plan.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments

267	Policy BH8: Specialist older persons housing	<ul style="list-style-type: none"> We consider that the wording in Part (a) of this is unclear and should be re-drafted. In growth areas it will be difficult for individual developers to work together on this target without the Council acting as a mediator. We consider that the 10% requirement should be in addition to the site's residential allocation not instead of. If not, then viability considerations will need to be recognised. The policy needs to refer to Policy BH7 as there will be areas in the borough that are not suitable for Older Person Housing. We would suggest that if Brent is contesting the London Plan / OAN figures, the Older Person housing target should also be reduced pro-rata to reflect Brent's proposed housing figure as the two figures are linked (e.g. if less standard housing is provided in a borough the demand for older person housing will reduce as the overall population in the borough won't increase at such a quick rate). We consider that no justification has been given as to why the South Kilburn growth area has been excluded from this requirement. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change</p> <p>Officer response: In taking forward Growth Areas whilst there is a role for the Council to act as mediator, for the area to be successful the main developers should really be working together so that there is clarity on ambition/ what type of place is being created and who will deliver it, so that the area is delivered as a package, rather than random developments occurring within an area. The specialist needs are part of the overall housing need and as such do not generate additional total housing requirements. The Growth Areas are not considered to be those that would fail policy BH7 and the overall older person housing target in the Brent SHMA is relatively consistent with the London Plan SHMA target that relates to a larger housing target. South Kilburn is excluded as that area has to re-provide social housing which is very expensive to do and is a significant challenge within the known capacity available on identified sites.</p> <hr/> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Maintain objection to the 10% requirement for specialist older persons housing because when taken into consideration with other policies in this plan, particularly the affordable housing requirements and the requirement to re-provide/replace commercial floorspace within residential developments, the impact on viability of all these policies will be significant. The Council recognise that due to viability, South Kilburn will not be able to provide for specialist older person accommodation and therefore other sites should also be able to consider the impact of this policy on viability of their scheme. <p>The Local Plan Viability Assessment does not appear to have included the impact of this policy on housing sites as the policy is only required to be delivered on sites over 500 units and the LPVA does not test sites of this size.</p> <p>Suggested amendment to the first part of the policy:</p> <p>"To support achieving the London Plan annual benchmark monitoring provision target of 230 dwellings per annum, <u>unless it can be demonstrated that such provision would not be viable</u>, the council will require provision of specialist older people's accommodation in the following circumstances:"</p>
268	Policy BH9: Gypsy and traveller accommodation (third paragraph)	<ul style="list-style-type: none"> As with the requirements of Policy BH8, we consider it will be difficult for individual developers to work closely together on the delivery of this target without the Council acting as facilitator. LBB should work positively and collaboratively with landowners and developers to identify suitable sites for gypsy and traveller accommodation. It is recognised that LBB are seeking clarity on the definition of a Gypsy or Traveller as part of their representations on the draft London Plan and we would welcome confirmation on this point as soon as possible. 	<p>LBB Response: Change made: Seek to clarify appropriate sites when the numbers of pitches required is known.</p> <p>Officer response: Noted. As outlined in policy BH9, the Council will work in line with London Plan policy to identify and deliver the necessary pitches required for Gypsy's and Travellers once the definition is clear as the needs identified are very different.</p> <hr/> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Object to policy BH9 because when taken into consideration with other policies in this Plan, particularly the affordable housing requirements and the requirement to re-provide/replace commercial floorspace within residential developments and specialist older person accommodation the impact on viability of all these policies will be significant. The Council recognise that due to viability, South Kilburn will not be able to provide for specialist older

			<p>person accommodation and therefore other sites should also be able to consider the impact of this policy on viability of their scheme.</p> <p>The Local Plan Viability Assessment does not appear to have included the impact of this policy on housing sites within the Borough.</p> <p>Policy BH9 also needs to provide a definition of the size of Traveller sites required and explain what is meant by 'innovative ways of accommodating needs'.</p> <p>We also object to Policy BH9 as there appears to be uncertainty on the definition of Gypsies and Travellers and therefore the overall requirements to accommodate Gypsy and Traveller sites within the Borough.</p>
269	6.2.104	<ul style="list-style-type: none"> As traditional housing in the Borough is to be delivered at higher densities, we consider that higher density Gypsy and Traveller accommodation should also be explored and promoted, particularly if it is being considered in growth areas where the delivery of new homes is a priority. 	<p>LBB Response: No change</p> <p>Officer response:</p> <p>Agreed, the relative scarcity of land to accommodate all Brent's development requirements requires the most efficient use of the land that is available.</p> <p>Noted. As outlined in policy BH9, the Council will work in line with London Plan policy to identify and deliver the necessary pitches required for Gypsy's and Travellers once the definition is clear as the needs identified are very different.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments. It is noted that Paragraph 6.2.83 now refers to the complexities of providing Gypsy and Traveller sites at low density and the need to use the land efficiently.
272	Policy BH13: Residential amenity space	<ul style="list-style-type: none"> We consider this policy should be revised in light of the increased housing targets and densities that Brent will need to deliver. Whilst LBB do currently apply these amenity standards flexibly, the policy is considered to be outdated and too onerous. If a local policy on this issue is to be included, it should be a more detailed policy and relate to the size of the units - 20sqm may be appropriate for a 3/4 bed unit but is clearly too large for 1 bed units. It is also not reflective of the number of persons that could be using the space e.g. a 10 unit scheme vs. a 100 unit scheme will result in very different levels of final occupancy. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change</p> <p>Officer response:</p> <p>Noted. The standard has applied to Brent over the last decade and for the most part has been shown to be able to be applied in high density developments. Other aspects such as the Urban Greening Factor indicate the need to provide open space/ planted areas. The Council considers its approach sufficiently flexible to take account of site circumstances and the quality of the communal space being provided where meeting the standard is shown to not be possible.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Maintain objection to Policy BH13 which is unsound as it is not justified or positively prepared. Amenity standard requirements should be different for different sized residential units. <p>Furthermore, the supporting text should refer to examples where other amenity provision, such as proximity to open space and internal amenity spaces that are provided in build to rent developments can contribute toward the overall provision.</p> <p>Suggested amendment is made to Paragraph 6.2.100:</p> <p>"In some locations, such as town centres, in high density developments <u>or</u> <u>developments with a high proportion of smaller units</u> the council understands that meeting the overall minimum might be challenging <u>or</u> unnecessary. In these instances, developments will need to demonstrate</p>

			<u>how the level of amenity space provided is considered to be acceptable taking into account other factors such as, mix of units, other areas of open space nearby and internal amenity spaces.”</u>
6.4 Economy: Preferred Policy Options BE1-BE9 and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
279	Policy BE1: Economic growth and employment opportunities for all	<ul style="list-style-type: none"> The policy seeks to protect the ‘Wembley Educational Quarter’ but we are not clear if this is a specific area or a vision for Wembley as a whole. We consider this should be clearly set out in the policy and if it is a defined area then it should be shown on the forthcoming proposals map, otherwise if this is part of the vision for Wembley this should be set out in the supporting paragraphs. The ‘Wembley Educational Quarter’ also needs to be clearly defined within the Local Plan. What are the Council expecting the Quarter to deliver and when? 	<p>LBB Response: No change</p> <p>Officer response: In the case of Wembley the location will essentially be defined by the final location of the College of North West London.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Objection maintained to Policy BE1 as it does not meet the test of soundness for effective planning. <p>The policy requires the education quarter at Wembley to be protected and enhanced however from the officer’s response it is clear that the education quarter has not been identified and will be decided by the final location of the new CNWL campus.</p> <p>The policy should therefore state that the Council will work with the CNWL and land owners at Wembley to deliver an educational quarter during the Plan period.</p>
284	Policy BE4: Supporting strong centres diversity of uses	<ul style="list-style-type: none"> We consider that having a ‘blanket’ ban on all A4 and A5 uses in all Primary Shopping Frontages (PSFs) in Brent is overly restrictive. No justification for this restriction is provided in the supporting text of the policy. If this policy is to be adopted, a full review of PSFs will need to be undertaken to ensure they are up to date and reflect the current retail and shopping patterns in these centres. We also consider that this policy will hinder the implementation of Policy BCH4 which seeks to support Brent’s night time economy, particularly in the four centres which are to be priority locations for such uses. In Wembley this could further hinder the aspiration to diversify and become a Metropolitan town centre location where significant food and drinking establishments are expected to support the other town centre uses. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change</p> <p>Officer response: The Council has undertaken a full review of the primary frontages in association with advice applied in the Retail and Leisure Needs Assessment. For Wembley currently the primary frontages are limited in their extent. For the new Wembley Park development, no frontages are yet defined and it is likely to be in the next local plan review that primary frontages for this area will be defined when it is clearer of the function of frontages following significant redevelopment of the area. The flexibility currently provided is significant in the non-primary frontage areas to accommodate night time economy uses, as such the proposed policy is considered appropriate and will not affect the tenant mix within the Wembley Park development in the short to medium term.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
6.5 Heritage and Infrastructure: Preferred Policy Options BHC1-BHC5 and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
296	Policy BHC2 National Stadium Wembley	<ul style="list-style-type: none"> We consider the preamble wording in BHC2 to be more onerous than existing policy requirements and is likely to have an impact upon densities achieved on sites coming forward around the stadium, particularly those to the east on the industrial estate fringes. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change made</p> <p>Officer response: Noted, but it is not considered that this will undermine what has historically been considered appropriate, only assumptions about the capacity on sites which developers/landowners might have had given the precedent heights being assumed in the Wembley masterplan.</p>

			<p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Whilst protecting the views of the National Stadium is supported, the importance of the growth area status of Wembley also needs to be recognised in any decision making. We would therefore consider the following additional wording to the policy: <p>“Development must not be to the <u>significant</u> detriment of the following views as shown on the Policies Map of the National Stadium Wembley.</p>
297	6.5.28	<ul style="list-style-type: none"> We consider this paragraph should be amended to refer to buildings immediately adjacent to the stadium as rising no higher than its shoulder height. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: Change made: Amend paragraph 6.5.32 to identify that buildings adjacent to the stadium should be no higher than its shoulder height.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
299	Policy: BHC4 Brent’s night time economy	<ul style="list-style-type: none"> We support this policy. 	<p>LBB Response: Noted.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
6.7 Sustainable Infrastructure: Preferred Policy Options BSUI1-BSUI4 and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
312	Policy BSUI1 – Creating a resilient and efficient Brent	<ul style="list-style-type: none"> How does the Council envisage the new CHP networks in the Growth Areas will be delivered. Will this be the responsibility of the major land owners or will the Council take the lead on this as they have in South Kilburn? The policy should acknowledge that delivery of a CHP network can be extremely challenging and may not necessarily be feasible or viable particularly where third party land is required to deliver the network. The policy should also recognise the current shift in energy policy as embodied within the draft London Plan where the GLA are now promoting other forms of communal heating including electrical heating which will be a more carbon efficient solution in future. Please refer to Appendix 1 for proposed text changes. 	<p>LBB Response: No change.</p> <p>Officer response:</p> <p>The Council is currently seeking to appoint additional resource to its sustainable energy team to allow it to take a greater lead on taking forward the district networks. This work will be done in association with the major developers/ landowners of areas. It is still a GLA policy requirement to provide/ connect to a district system.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> Maintain objection to Policy BSUI1 as we consider these matters are covered in more detail in either the site specific allocations for the Growth Areas or the London Plan and therefore do not need to be repeated within this policy. <p>The policy should therefore be deleted.</p>
316	Policy BSUI14:	<ul style="list-style-type: none"> We consider the requirement for minor development and changes of use proposals to be accompanied by a drainage strategy (and a drainage strategy maintenance plan) should only occur where there is significant detrimental impact on the current drainage regime. Where drainage strategies for minor development and changes of use are required, these should be assessed by LBB 	<p>LBB Response: No change</p> <p>Officer response:</p> <p>These strategies are principally associated with the impact of surface water flooding. Brent in its role as Lead Local Authority will assess the appropriateness of the majority of these applications.</p>

		<p>as Thames Water and the EA are not suitably resourced to receive large numbers of drainage strategies and this will lead to significant delays in determining applications.</p> <ul style="list-style-type: none"> Please refer to Appendix 1 for proposed text changes. 	<p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
6.8 Transport: Preferred Policy Options BT1-BT4 and associated material			
Page No	Paragraph No	Quintain Regulation 18 Comments	LBB Response / Quintain Regulation 19 Comments
321	Policy BT1: Sustainable Travel Choice	<ul style="list-style-type: none"> We support the West London Orbital rail link project and consider its delivery will significantly enhance the boroughs connectivity 	<p>LBB Response: Support noted.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
321	6.8.13	<ul style="list-style-type: none"> We are unclear as to how the new station at Neasden will be funded. Given the requirements of draft London Plan Policy D6 (Optimising Housing Density) it is important to ensure that the capacity of allocated sites is correctly identified so that improvements to infrastructure capacity can be assessed and planned. 	<p>LBB Response: No change made. Officer response: The West London Alliance are working with TfL on identifying the funding strategy for the WLO including any new stations and infrastructure required.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
324	Policy BT2: Parking and Car Free Dev	<ul style="list-style-type: none"> Policy BT2 requires developments to provide parking consistent with the standards set out in Appendix 3 of the Local Plan. For residential development, the parking standards to be applied are those as set out in London Plan Policy T6.1 and the cycle parking standards to be applied are those as set out in London Plan Policy T5. We would highlight that the EVCP provision and cycle parking standards are significantly higher in the draft London Plan whilst the overall parking requirement is lower. LBB need to recognise the cumulative impact of such design policies on the viability of a scheme - often the provision of a certain level of on-site parking can add value to schemes and improve their viability. 	<p>LBB Response: No change made. Officer response: Noted. The impact of the London Plan Electric Vehicle and cycle parking standards were tested in the London Plan Viability Study. The draft Brent Local Plan must be in conformity with the London Plan and has also been subject to viability testing.</p> <p>Quintain Regulation 19 Comments:</p> <ul style="list-style-type: none"> No further comments
7. Delivery & Monitoring and associated material			
Page No	Paragraph No	Comments	
		NONE	
8. Appendices and Glossary: Contents and associated material			
Page No	Paragraph No	Comments	
		NONE	
Integrated Impact Assessment			
Page No	Paragraph No	Comments	
		NONE	

