

# BRENT LOCAL PLAN PUBLICATION STAGE CONSULTATION STATEMENT

March 2020



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## Background

The London Borough of Brent (the Council) has consulted publicly on the Publication Stage Local Plan from 24<sup>th</sup> October 2019 to the 5<sup>th</sup> December 2020. This allowed all stakeholders, including residents and organisations to provide comment. These comments have been summarised for concision, and provided with a policy response from the Council. Any proposed changes resulting from each comment has been stated in the Schedule of Modifications which has been submitted with the draft Local Plan for examination.

The Publication Stage consultation follows previous stages of consultation on the draft Brent Local Plan. The first of these stages was an informal consultation in 2017, the processes and results of which are summarised in the [Brent Local Plan Consultation Summary Document](#) February 2018. In addition to this an Issues and Options Document was consulted upon in February – March 2018. The processes and results of this consultation are summarised in the [Brent Local Plan Issues and Options Consultation Statement November 2018](#). The Preferred Options draft Local Plan was consulted upon from November 2018 – January 2019. This stage helped firm up the Council's position on its preferred policies. The process and results of this consultation are summarised in the [Preferred Options Consultation Statement 2019](#).

The Local Plan will guide the future development of the borough where the council is the Local Planning Authority to 2041 and on some sites possibly beyond. Old Oak and Park Royal Development Corporation (OPDC) are the local planning authority for parts of Brent in Park Royal and on railway land from the north circular road down to Willesden Junction station. They are producing their own Local Plan which is in an advanced stage of preparation having been submitted for examination. Once adopted, the Brent Local Plan will replace the Brent Core Strategy, Brent Site Allocations Plan, Wembley Area Action Plan and Brent Development Management Policies plans.

Publication stage marks the final stage of consultation prior to examination. This stage was focused on the 'soundness' of the plan, as it relates to the requirements in the NPPF. The comments received have helped the Council address any outstanding issues in the Plan. Examination will seek to identify any further issues, and provide the Council with the opportunity to present its case to the Inspector. Consultation on proposed modifications generated throughout the examination process may take place following the examination hearings, prior to receipt of the Inspector's Report.

All comments received to the publication draft have been considered, with associated changes arising from each comment available on the Shape Brent [webpage](#). This document presents an executive summary of comments and where considered appropriate, proposed changes suggested.

## Summary

The consultation (Regulation 19) ran for six weeks, between 24<sup>th</sup> October and 5<sup>th</sup> December 2019. It was promoted under the brand Shape Brent using the following methods:

- Social media - Twitter, Facebook, Yammer using #shapebrent;
- Leaflets and posters/roller banners in council buildings;
- Posters in Park Notice Boards;
- Exhibition and flyers at Drop in Sessions;
- Emailing Local Plan and Community Database including list of Statutory Consultees, adjacent boroughs and those people who expressed an interest in being kept informed of the Local Plan;
- Emailing Brent Citizen's Panel;
- E-newsletter;
- Promoting via Brent Connects mailing list;
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent;
- Main Council webpage and dedicated website [www.brent.gov.uk/shapebrent](http://www.brent.gov.uk/shapebrent);
- Elected Members' News bulletin; and
- Promotional Video
- Article in the Council's 'Your Brent' magazine (distributed to every household in the borough)

Six 'drop-in' sessions took place within local libraries, each lasting 3 hours. This gave the public the chance to speak with the team on issues face-to-face. In terms of numbers approximately 10 people were engaged at each session. However, there was a constant presence from the public at each session, enabling those who did attend to voice their concerns in detail. An online questionnaire was built to improve the effectiveness of the consultation. This received 16 respondents. The vast majority of responses were received via email, of which there were 58. In total there were 71 unique respondents, making 552 comments, resulting in 201 proposed changes to the document (see figure 2). Most representations made were from organisations, themselves comprising developers, landowners, charities and government bodies. Approximately a quarter of representations were from individuals and resident groups (see figure 1). The 'Places' chapters which received the most comments were the North, Central and South West Places (figure 3). The 'Themes' chapters which received the most comments were Housing, Economy and Town Centres, and Transport (figure 2).

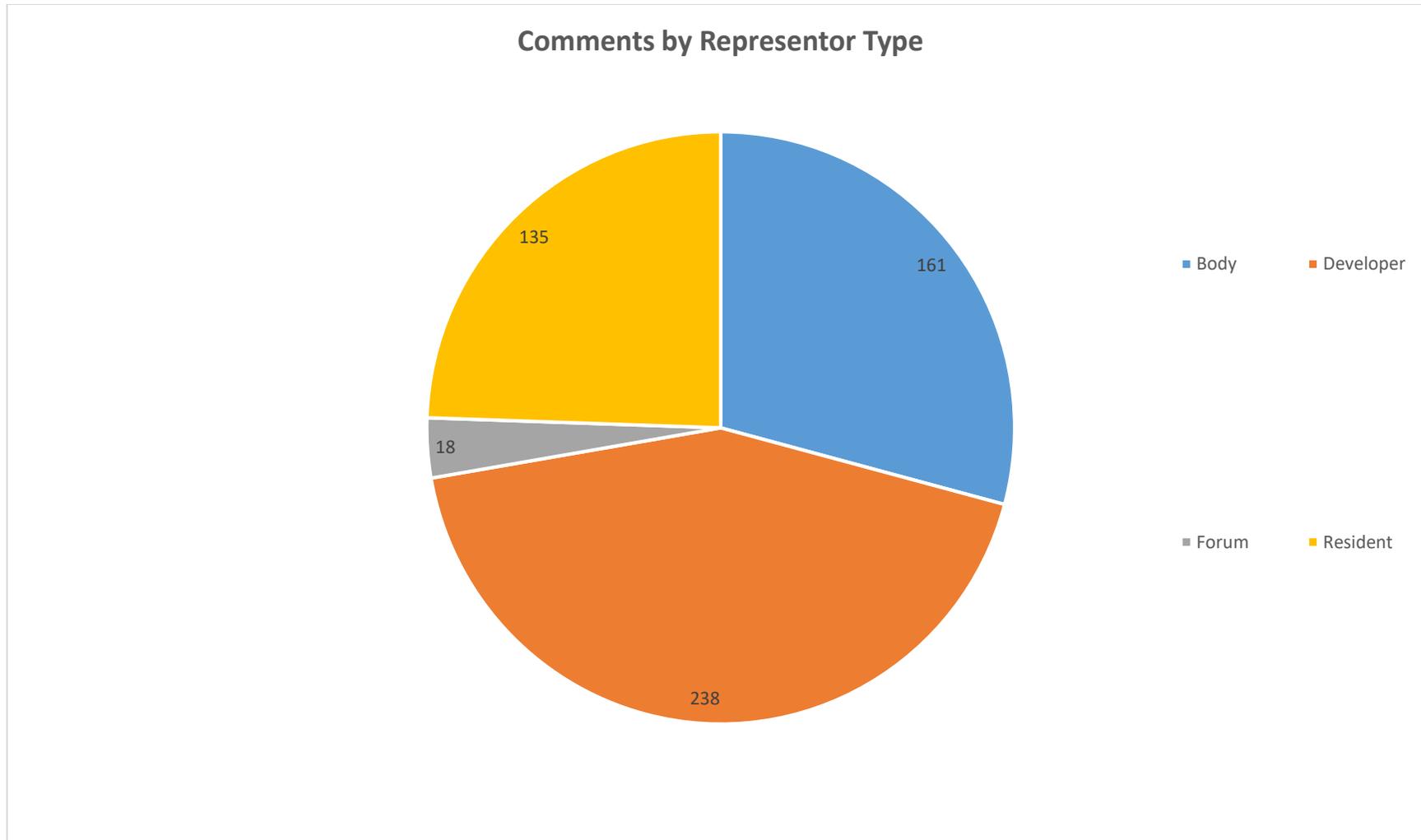


Figure 1: Comments broken down by who made representation

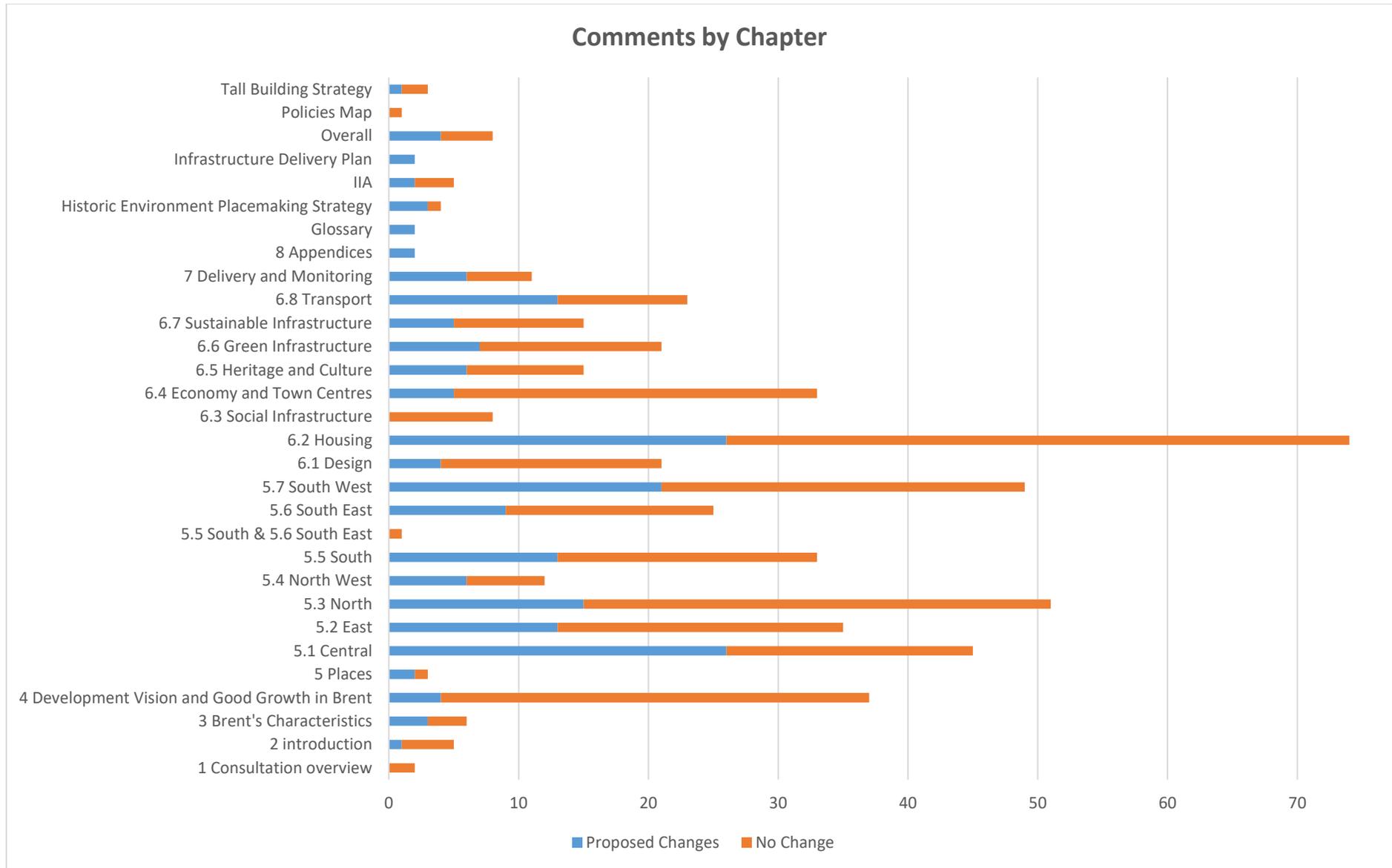


Figure 2: Comments broken down by chapter, including those which resulted in changes, and those which did not.

## Places

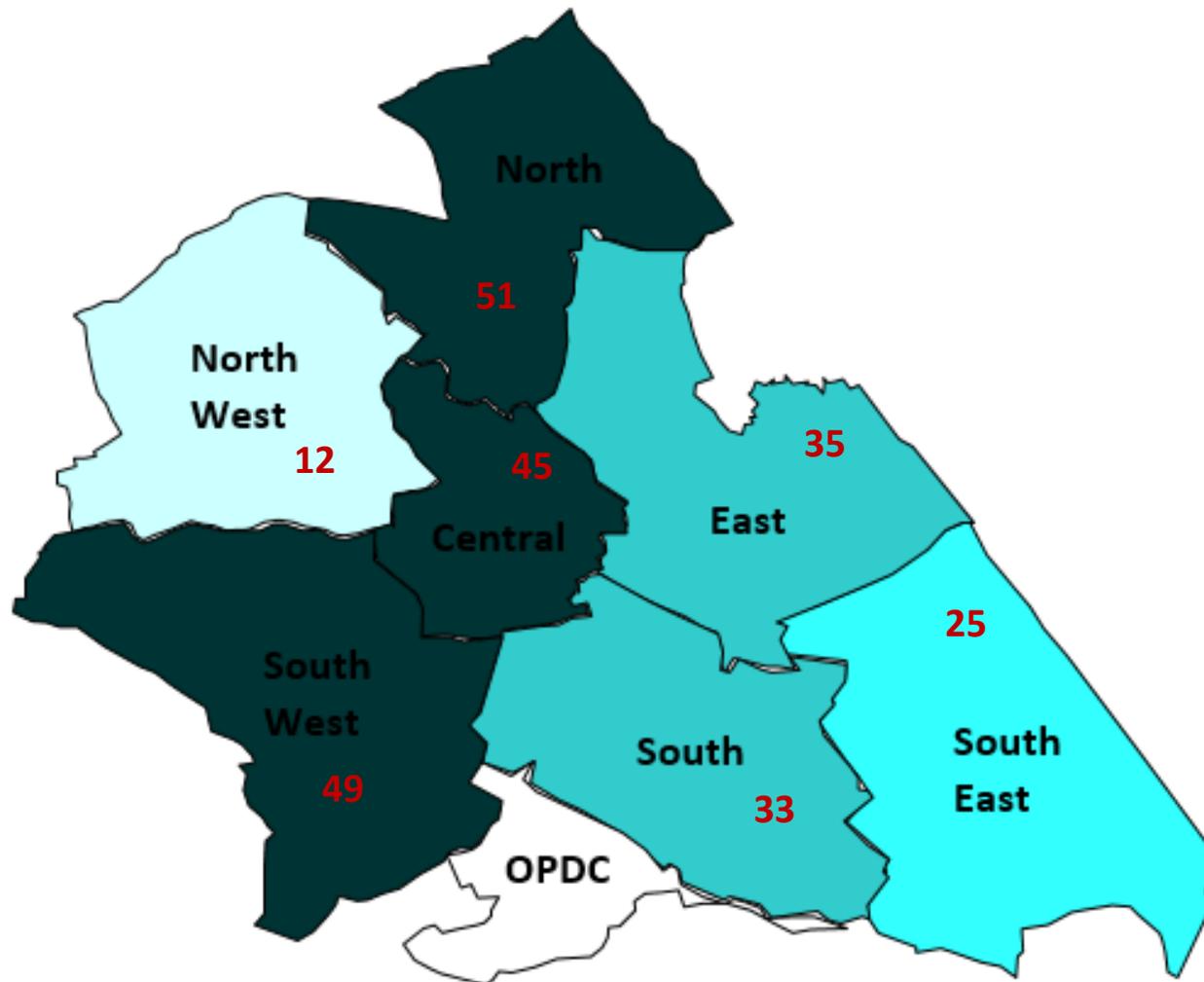


Figure 3: Comments by Place, with the darker areas receiving more comments.

## Common themes

There are a number of themes which have been picked up from the representations which permeate the Plan's Places. For concision, these will be summarised here, and not repeated within each respective Place summary.

**Developers and landowners** are supportive of growth and are seeking higher densities. They have therefore queried the indicative capacities of site allocations and the appropriate heights allowed. The capacities are indicative only, and the heights have built in flexibility, with neither being prescriptive. These are provided as guidelines, and to help the Council Plan for development going forward. Providing a design-led approach is taken, in accordance with the London Plan, and other policies within this Plan, greater heights/ densities may be deemed appropriate. They are also seeking greater flexibility. This is with particular regard toward the requirement for masterplanning. A masterplan approach will be taken on all appropriate sites, in accordance with London Plan policy E7. Development will not be granted permission, unless it can be demonstrated not to prejudice the site coming forward comprehensively. This will help maximise the output of the site, assisting the Council in meeting its housing and industrial floorspace targets, and bringing forward any necessary infrastructure. It is argued that the detail outlined within the site allocations for such sites represents a 'Plan-led' approach, and therefore meets the requirements of London Plan policy E7. The detail provided would not be sufficient to ensure their successful comprehensive delivery. The inclusion of such detail within the Plan, as well as delaying its adoption, would not be appropriate. To increase flexibility, developers and landowners also wish to reduce the identified range of uses for sites. This includes industrial floorspace, and social infrastructure generally. This is seen as inappropriate, and may result in developments coming forward without sufficient supporting infrastructure. The requirement to engage with all stakeholders during masterplanning was also raised. This has been accepted as good practice by the Council.

**Residents** responses received at this stage were generally not supportive of growth and believe that the growth proposed cannot come forward sustainably. This manifests itself as a rejection of sites allocated for tall buildings. The Council has been set a significant housing target in the emerging London Plan. We retain limited brownfield land in which to meet this target. Meeting the targets on greenfield sites is not sustainable/ desirable, nor is it supported by national/ regional policy. Therefore, high density, tall building development is required in order to meet identified housing needs, and other requirements. The Plan, in accordance with the Tall Building Strategy, seeks to limit the impacts of tall buildings by directing them toward 'clusters' identified as suitable for their accommodation. These areas have already established a precedent of taller buildings, or have potential for transformative change. This approach is supported within the London Plan. Residents also express concern over the development of open space. With the exception of two sites, the Plan does not identify any designated open space for development. Exceptions to this are at South Kilburn with land swaps occurring through the wholesale regeneration of the estate, which will result in no overall loss. The other is the proposed 'land-swap' at Northwick Park. This will incur no net loss of open space, and will improve the function/ openness of the Metropolitan Open Land (MOL).

**Thames water** have commented on all site allocations stating that they will need to be engaged at the earliest opportunity. This has been included within the Infrastructure Requirements of each site allocation.

Some of these elements have been amended when appropriate evidence/ justification has been provided. In most instances, this has been insignificant, and has not changed the general direction of the document. Where this is of most significance, it has been outlined in more detail below.

## Central

There were 45 comments on the Central Place. This resulted in 26 changes to the document. Many of the site allocations within this Place have been extended forward from the previous Plan and the Wembley Area Action Plan (WAAP). This Plan has progressed some way through outline permissions with the developer Quintain. It proposed comprehensive redevelopment of the area to create a better sense of Place. This Plan designated a number of industrial sites for residential development. The GLA have stated that the industrial uses on these sites should be intensified in line with policies E4 & E7 of the London Plan, and in accordance with LB Brent's 'Provide Capacity' status. Where it considered it possible the Council has previously amended policy requirements for redevelopment of industrial sites in response to the GLA as part of mixed use developments in the Publication version of the Plan. The Plan seeks a pragmatic approach taking account of the borough's draft London Plan housing target and industrial land policies and the fact that many sites have had long term allocations.

Transport for London Commercial Development (TfL CD) have requested that the town centre boundary include the southern portion of BCSA7. This is argued to increase the viability/ vitality of the town centre through a greater mix of uses. It is an 'edge of centre' site proposed for mixed-use, residential-led development. This gives sufficient flexibility to the policy without the requirement for a boundary amendment. The amendment would not be supported by the conclusions drawn from the Brent Retail and Leisure Needs Assessment. They have also sought the potential for additional height on proposed allocations around Wembley Park station.

Assessment of the Plan also established an inconsistency between policies BE2 and BCSA17. BE2 states that Wembley SIL should be intensified with industrial uses only. BCSA17 is situated within Wembley SIL, however, had an indicative capacity of 60 residential units. Given the existing environment and extant permissions, this site is now not considered appropriate for residential development. It is proposed to delete this allocation as a result of this analysis.

## East

There were 35 comments on the East Place. This resulted in 13 changes to the document. This Place includes two new Growth Areas, including Staples Corner, and Neasden Stations. Staples Corner is wholly Strategic Industrial Land (SIL), whereas Neasden is partially, although this was de-designated to LSIS for this iteration of the Plan. This portion of Wembley SIL was released as it was segregated from the rest of the SIL, and did not provide function in support of it. The Plan proposes co-location through masterplan at both sites. The GLA do not accept this as the co-location of SIL is not supported by the London Plan. The London Plan states that SIL should be intensified for industrial uses. If a portion is to receive residential development, the SIL should first be intensified/ consolidated, so as to offset the losses from release for residential. The Council do not see this as feasible, and believe the potential for co-location is greater, particularly considering its proximity

to the new Brent Cross development/ stations. Without the support of residential, the site may not receive interest for intensification. The site would also be instrumental in meeting the Council's housing targets. Through a positive masterplan approach, in collaboration with the GLA, it is determined that any issues can be addressed effectively.

Staples Corner is also adjacent to the boroughs only Site of Special Scientific Interest (SSSI), the Brent Reservoir. As the area is deficient in green space, the associated development would require its greater recreational use. Natural England have expressed their concern over the potential for wildlife disturbances, and seek further consideration/ mitigation. This has been included in the Growth Area requirements (BEGA2).

The Neasden Stations Growth Area is adjacent to an existing Aggregates railway facility. The owners have expressed concerns over impacts of proposed developments. Greater consideration of its function has been included within the Growth Area Requirements (BEGA1). The potential of this area to be planned for accommodating additional long term potential for rail infrastructure has also been identified by a local resident who considers that the current plans would compromise potential to connect rail lines/ services. Whilst the council acknowledges the potential desirability of this, it does not consider that such potential is sufficiently deliverable to warrant inclusion.

## North

There were 51 comments on the North Place. This resulted in 15 changes to the document. The primary emphasis in this area was with regards to the masterplanning requirement on both BNSA1 and BNSA2. BNSA1 is not wholly Locally Significant Industrial Site (LSIS) land. Therefore it is argued that those areas outside of LSIS should not be subject to this approach. In order to bring the site forward coherently, and utilise land for the delivery of key targets, the site will need to come forward comprehensively. This is particularly evident given the Council's 'provide capacity' status. The same goes for BNSA2, however, this site does not include any LSIS land. Therefore the requirement for masterplanning is not directly supported by the London Plan, nevertheless the Council considers that masterplanning is necessary to create better, more sustainable outcomes. Retail was also included within the Allocated Uses of BNSA2. Being an 'out-of-centre' site, this is not supported within London Plan policy. The Council is aware that existing retail on-site is trading well. In order to provide greater likelihood of comprehensive delivery, and associated intensification, such an incentive may be required.

## North West

There were 12 comments on the North West Place. This resulted in 6 changes to the document. Much of the comments in this Place concerned green space. The GLA do not support the MOL land swap proposed at Northwick Park. However, they state that London Plan policy G3C requires amendments to MOL boundaries to be Plan-led, which this is. The Ducker Pond site is adjacent to the Northwick Park Growth Area and is designated MOL and a Site of Importance for Nature Conservation (SINC). It was previously an outdoor swimming pool, but is now one of few woodland sites in the borough. The current landowners wish to reinstate the previous leisure use of the site whilst ensuring no net loss of

biodiversity. The flexibility for this potential exists within planning policy. Given that the site is currently occupied by woodland, and the need to replace/ offset existing biodiversity within the borough, its delivery is considered unlikely. This has therefore not been allocated within the site, however, providing issues raised are addressed, it may still be possible to secure permission.

## South

There were 33 comments on the South Place. This resulted in 13 changes to the document. Ikea is situated within Wembley SIL, adjacent to the North Circular Road. They argue that the SIL they occupy, and that of the surrounding area, should be de-designated in favour of co-location as they are currently occupied by A1 uses. A similar argument has been put forward by Tesco on an adjacent site. In both cases the Council considers that de-designation would not be appropriate as it would compromise the potential of the SIL in assisting the Council in meeting its 'Provide Capacity' targets.

The GLA have stated that the breakers yard site within site allocation BSSA7 should be protected. This site is allocated to maximise community benefit through the provision of a new leisure centre, with the breakers yard space being instrumental in its effective delivery. The site has not been recognised as being of strategic importance within the West London Waste Plan. This is therefore considered unnecessary as it would compromise the effective delivery of the site.

The Environment Agency (EA) have identified concerns about the desirability of allocating sites Wembley Point/ Argenta House and Bridge Park as both are within Fluvial Zone 3 and in the case of Wembley Point the EA have identified that much of the land is functional floodplain. The Council recognises these concerns and is doing more work on the Strategic Flood Risk Assessment to support the Plan. The owner of Wembley Point contends that their site is not functional floodplain and is seeking to work with the EA to agree appropriate modelling to ensure risk is adequately predicted.

## South East

There were 25 comments on the South East Place. This resulted in 9 changes to the document. The GLA and residents commented upon the lack of open space in the South Kilburn Growth Area. This area has an adopted masterplan SPD which has recently received significant support from residents. The area is being reconfigured, but will result in no net loss of open space. The proposed park will be 1.8ha. This is slightly short of London Plan standards of 2ha. This is seen as justified given the numerous constraints within the area, and the Council's need to re-provide existing socially rented affordable housing/ meet strict London Plan (minimum 50% affordable on-site) requirements.

Opposition has been received on the proposed Intensification Corridors within the area, on the grounds of loss of character/ heritage. Growth in London is not anticipated to slow in the foreseeable future. In light of the assumptions around the borough's small site development capacity

within the new London Plan, it was seen as appropriate to direct this growth toward the most suitable/ sustainable areas. This will ensure the borough's character for the most part is not significantly diluted and heritage assets and their settings are preserved or enhanced.

There was also concern that the 'Place' boundaries have been set inappropriately, not giving sufficient consideration to existing character. Splitting the borough up into Places makes the borough more manageable in Planning terms. This is supported by the London Plan, and will not be to the detriment of their management. There was a local desire to make better use of vacant/ underused premises. Such sites have been allocated within the Plan as is practicable.

### South West

There were 49 comments on the South West Place. This resulted in 21 changes to the document. This Place includes Wembley town centre which is the borough's largest. It has been argued that the Plan does not provide sufficient policy to improve the centre for wider social benefit. This includes the requirement for greater clarity on Plans for Wembley Triangle and the area encompassed by the Western Corridor Study of Wembley High Road. The Council believes the Plan does provide effective policy for the area to reach its potential.

This area also includes within its boundary the Sudbury Town Neighbourhood Plan. The Sudbury Town Residents Association (STRA) do not support the proposed development within this area, stating it conflicts with their Neighbourhood Plan. They are particularly against the taller developments proposed in the Intensification Corridors and Keeler's Service Centre (BSWSA12). In addition to this, they oppose the allocation of Sudbury Town Station car park (BSWSA14) as it would remove parking; and the opportunity for the enhancement of Vale Farm and its sports facilities. On these grounds, STRA undertook a local survey. This resulted in 100% support in favour of the Neighbourhood Plan from 319 residents, with zero support for the new Local Plan. Notwithstanding STRA's representations, the Council considers that the Local Plan is not inconsistent with the policies in the Neighbourhood Plan.

The owners of 416 Ealing Road (BSWSA16) object to designation of adjacent 45-47 Alperton Lane, which currently comprises industrial uses, as Locally Significant Industrial Site. The Council considers this designation as appropriate in supporting Brent's 'Provide Capacity' status for intensification of industrial land.

## Themes

### Design

There were 21 comments on this chapter. This resulted in 4 changes to the document. There is general support for the Tall Buildings in Brent policy (BD2), however, some developers seek greater flexibility on heights. TFL CD have requested greater flexibility of heights on sites outside of Tall Building Zones. The London Plan states that boroughs should identify locations appropriate for tall buildings. The Council have therefore identified 'clusters' where this is the case. These are numerous and extensive, with the ability to accommodate many tall (10+ storey) buildings in defined Tall Building Zones and 5 storeys in defined intensification corridors and town centres (where higher may also be allowed). Outside of these areas development up to 2 storeys greater than the prevailing height will be accepted. Therefore, the current approach is considered acceptable. Clarification has also been sought as to what is meant by the 'pinnacle' polygons on the policies map. This is a relic of a previous version of the Tall Building Strategy which is no longer being pursued. Reference to this will therefore be removed in forthcoming iterations of the policies map. As a result of consultation, potential amendments will be made to the Northfields, and Colindale Tall Building Zones. This is to better reflect their character, bring in line with other policy wording/ extant permissions, and maximise their potential as appropriate.

A number of residents have expressed concern over the Basement Development policy, BD3. They have stated the policy is not sufficient in protecting neighbouring properties, and does not best reflect the requirements of local conditions. The requirements stated are not matters which can be reasonably dealt with through the planning system, and are already addressed by existing legislation. Therefore, the matters included within the policy are considered sufficient and appropriate given their ability to address issues as they relate to planning.

### Housing

There were 74 comments on this chapter. This resulted in 26 changes to the document. The majority of the representations made on this chapter were by developers objecting on the grounds of viability. They are therefore requesting greater flexibility on policies. This includes the affordable housing policy (BH5), whereby developers do not agree with the adoption of the Mayor's threshold approach. This has been considered sound by the panel of inspectors. The policy also proposes that a minimum of the affordable housing provided in Build to Rent (BtR) developments should be 100% London Living Rent (LLR). It has been argued as unviable due to the level of subsidy required from development. Others state that this would not sufficiently address need and would result in homogenous tenure mixes, which would be detrimental. The range in rent levels associated with LLR across the borough makes it in many areas comparable to social rent levels, thus meets needs. In other parts of the borough it is more of an intermediate product, which therefore allows for a wider range of need to be met by households on a range of low incomes. The Council has commissioned more work on the viability of the LLR requirement in the Wembley area as a result of representations from Quintain. The Housing Size Mix policy (BH6) has also been objected to, with representations stating that

under the new London Plan, boroughs cannot make this prescription. This has since been overturned by the panel and is therefore justified to meet needs.

Developers also object to the BtR policy (BH3) which states that for major developments of 500 dwellings or more, the provision of BtR will be expected. It is argued that this is not flexible enough, and that Local Plan policy cannot dictate the type of developments to this extent. The Council considers that the policy is still valid, it will assist the Council in bringing homes forward more quickly, whilst helping to meet the needs of our residents who largely rent, as is the case across much of London.

Innovative Infill have made a significant number of comments, largely on the soundness of the Small Sites policy (BH4). It is argued that the current policy is restrictive, reducing the London Plan small sites policy standard by removing the presumption in favour of development within 800m of a station or town centre. The London Plan small sites 'presumption in favour' policy is no longer included within the 'intend to publish' London Plan, with the panel having found it unsound. Reflecting this change in London Plan policy, the Council has made extensive changes to policy BH4 to address the void created by the loss of London Plan policy H2A.

The issue of lack of positive planning for meeting the needs of Gypsies and Travellers through sufficient site allocations has been raised. The Council has considered this matter and has evidence of needs through work it has commissioned. Nevertheless, the needs vary considerably depending on whether national policy definitions or those set out in the emergent London Plan are used. The Mayor has adopted a policy which MHCLG and the Panel of Inspectors is not aligned with national policy. The Council considers that given this uncertainty its enabling policies are currently appropriate in promoting sites to come forward.

## Social Infrastructure

There were 8 comments on this chapter. This resulted in no changes to the document. The GLA have noted that the Council have not conducted a Social Infrastructure Needs Assessment. This is required by new London Plan policy. The Council have undertaken numerous assessments which consider social infrastructure. These have been collated within the Infrastructure Delivery Plan (IDP). This has had significant input from providers, including the Clinical Commissioning Group and schools planning etc. The Council sees this as a sufficient and justified approach.

Sports England have queried the effectiveness of policy BSI1, stating it does not effectively manage loss, loss of one use to another, or effectively Plan for future growth. The policy is currently worded so as to provide flexibility of uses, whilst allowing for the opportunity for loss in exceptional circumstances. Given the existing shortfall in such infrastructure, it is considered unlikely that they will be lost altogether. They may change to other types of social infrastructure, providing it is justified by need. Future growth is dealt with within individual site allocations, and within the IDP. In relation to these objections, they have suggested a dedicated policy is provided for both indoor and outdoor sports facilities. This too is included within individual site allocations. This is seen as sufficient given current requirements in updating the Plan every 5 years.

The department for education have raised objections to the development requirements of social infrastructure. This includes them meeting BREAM Excellent standards, and being flexible and adaptable buildings. Flexibility for this is built into the policy. The requirements are deemed appropriate given the need to ensure the long-term sustainable use of such buildings, which may be re-purposed in the future.

## Economy and Town Centres

There were 33 comments on this chapter. This resulted in 5 changes to the document. The GLA has raised 'general conformity' issues with elements of this chapter associated with industrial land/ sites. Brent is a 'Provide Capacity' borough, and as such needs to deliver approximately 49ha of industrial floorspace. The GLA do not consider the Council's current approach as sufficient in addressing this requirement, stating that a more borough-wide, plan coordinated approach should be taken to ensure the full target is achieved. In order to encourage industrial intensification, and help meet the Council's significant residential targets with limited land, some SIL has been allocated for intensification via co-location. This will be subject to a comprehensive masterplan approach. This is not in general conformity with the London Plan. If SIL is to include residential, it should first be intensified to accommodate the losses which would occur from a de-designation of land for residential development. This is not seen as feasible by the Council, and will not realistically assist the borough in meeting its residential and industrial floorspace targets. The GLA's objection also manifests itself in a rejection of the Council's evidence base documents, stating that these are a matter of non-conformity with the London Plan. These include the West London Employment Land Review, and the Brent Industrial Land Audit. This is seen to support their argument above. On the other hand, some representors such as IKEA and Tesco have objected to their sites retaining their long-term Strategic Industrial Land designations which they consider is incompatible with the existing uses. Others have focused on Locally Significant Industrial Site designations, referencing their extent, or the potentially restrictive nature of them being identified for purely for industrial intensification, rather than co-location incorporating a wider range of uses.

In addition to this, the GLA suggest we have a stronger plan-led approach to the delivery of identified office floorspace requirements. An evidence base document would be required to instruct the allocation of office space within site allocations. This should be supported by a standalone policy which would direct further unallocated office space. The boroughs floorspace target set by the London Plan stands at 44,000 sq.m. to 2041. Office floorspace is currently unviable across most of the borough. Whilst the Council has supportive policies to retain and provide new office floorspace, such as in Wembley Park and town centres, the lack of viability has limited the extent to which additional capacity is identified.

One issue, which is currently receiving consideration by the Council, is the implications of policy BE3. This states that 10% of all developments over 3000 sq.m. should come forward as affordable workspace. It has been raised as a potential viability issue by a number of representations. The Council commissioned additional viability work to assess the impact of the policy in conjunction with the other policies within the Plan. The results of this thorough assessment will determine our approach going forward.

Other concerns have been raised with regards to proposals for the College of Northwest London (CNWL). The current plan is to move the outdated facility at Neasden to Wembley Park, consolidating the facilities into one area. Although it is agreed that the new facility will be within the Wembley Park area, a specific location is yet to be agreed. Policy BE1 therefore needs to protect this potential, but cannot be specific about a site, which was the original policy intention. Residents are also concerned by this, stating the significance of the existing Willesden college facility, the implications for its movement on the local population, and the retention of the existing educational offer. The current facility is dated, poorly located in transport terms and in respect of its dislocation from other CNWL facilities. Its movement will address these issues, whilst also freeing up otherwise poorly utilised land for other uses.

KFC have objected against the policy that limits the number of takeaways within town centres and in close proximity to schools. The Council is essentially taking forward an existing policy and on the basis of local evidence which was previously accepted by the Planning Inspectorate, considers that this policy is still justified as appropriate.

## Heritage and Culture

There were 15 comments on this chapter. This resulted in 6 changes to the document. The GLA show concern over the number of pubs lost in the past. They have suggested that policy BHC4 is strengthened to better safeguard current provision. They also suggest that the Council be more supportive of the development of new public houses in the future. The current wording of the policy is seen as sufficient to protect existing provision whilst providing necessary flexibility. Policy BE4 seeks to protect essential retail function of town centres in primary frontages. Other areas within town centres provide flexibility of uses to allow for the development of pubs.

Historic England have sought more positive wording in relation to the archaeological value of the borough, and have suggested the provision of clarity on archaeological survey requirements/ best practice. Amendments to this extent have been accepted.

The Canal and River Trust have requested the Council acknowledge the heritage value of the Canal and associated infrastructure. The Council has now included reference to these infrastructures as being non-designated heritage assets. This has been extended to include all significant waterways and associated infrastructures within the borough.

## Green Infrastructure

There were 21 comments on this chapter. This resulted in 7 changes to the document. Both the Environment Agency (EA) and the Woodland Trust both support the policies outlined within this chapter. They have stated the need to reference the DEFRA biodiversity metric 2.0, among reference to other metrics/ guidance documents. These have been included where appropriate. The Woodland Trust has suggested a few other standards which should be included within the Plan. This included no resident living more than 500m from accessible woodland of 2ha or

greater, and a target of 20% tree canopy cover borough wide. Given the urban nature of the borough, and the significant competing demands for land, these targets are seen as unrealistic. The London Plan has set a canopy cover of 10% for London boroughs which is seen as sufficient and achievable. They have also suggested that tree replacement ratios should be set within policy BGI2. The policies current approach of requiring replacement canopy cover is considered more appropriate, with built-in flexibility, as it is less prescriptive.

The Department for Education (DfE) are concerned about the implications of tree replacement on the delivery of schools. Trees represent a vital component of the boroughs makeup, providing significant benefits to residents and helping curb climate change. The delivery of this infrastructure will be integral to the sustainable development of the borough, and therefore the policy, as worded, is considered appropriate.

### Sustainable Infrastructure

There were 15 comments on this chapter. This resulted in 5 changes to the document. The EA and Natural England support the policies outlined within this chapter. The EA have stated a number of issues which currently render BSUI3 unsound. This was primarily in reference to the development of 'developed functional floodplain', and what would constitute appropriate development in these areas. Much of what would ordinarily be considered functional floodplain has been developed. The Council considers that there may be opportunities to reinstate floodplain, or improve the effectiveness of the floodplain through new development. Further clarity has been provided to explain what is meant by this, and to ensure its reference to national policy, the sequential and exception tests.

Developers Quintain and St. George do not support policy BSUI1. Quintain state that the policy should be deleted as such matters are already covered by the London Plan, and within individual site allocations. This policy is in response to London Plan requirements on boroughs to develop supporting standards for energy infrastructure. It would not be appropriate to rely solely on site allocations as the policy provides guidance for windfall sites also, which will not have their own policies. Neither are the details within individual allocations sufficient to address this issue. St. George see the policy as ambiguous, requiring all major developments, including those outside Growth Areas, to connect to a decentralised energy system, or the proposed heating system is 100% renewable. This is correct, and therefore the policy wording is not ambiguous, however, the policy does build in sufficient flexibility in the event that such requirements are not viable. This is considered justified to enable an efficient and resilient Brent, and will help meet net zero-carbon targets.

The DfE take issue with the requirement for all major non-residential developments to achieve BREEAM 'Excellent' standards. This is stated within policy BSUI1, and considered justified in assisting the Council in meeting its net zero-carbon targets.

## Transport

There were 23 comments on this chapter. This resulted in 13 changes to the document. Highways England have concerns over the impact of the boroughs projected population growth upon the M1. They have therefore stated that a Strategic Transport Assessment should be undertaken to assess this impact. The Plan currently seeks to reduce vehicular dependence, and increase the uptake of sustainable transport modes. In areas subject to redevelopment this will result in fewer private vehicles than previously existed. The Mayor's Strategic Transport Modelling Report models the impact of the projection population increase within London, in accordance with the London Plan transport policies. This will result in a significant decrease in trips generated per day. As such, this should be sufficient evidence to justify the Council's approach, which itself does not deviate significantly from the London Plan. The Council has sought to work with Highways England and TfL to agree a position on what level of work in terms of transport modelling is required, as this is not solely a Brent issue, but also that of LB Barnet and potentially a wider number of north London boroughs.

A resident has suggested modifications, primarily relating to the safeguarding of land for potential future transport uses. This includes at Wembley Park railway sidings, Wembley cutting, Northwick Park and Neasden. The proposal at Wembley Park is for the retention of railway siding land to allow for potential Chiltern Line platforms for carriages from the Aylesbury Branch to stop. This has been accepted in consultation with TFL. The latter proposals are for unsupported schemes, and would place undue restrictions upon development, which needs to be maximised to meet the Council's residential and industrial floorspace targets. The safeguarding of land along the A4006 for a dedicated tram system has also been proposed, from Harrow to Brent Cross. The principle of this is interesting, however, it will not be specifically mentioned in the Plan as it is unsupported. The Plan is considered unlikely to compromise its delivery and indeed may support it through its identification of much of its length as intensification corridor.

TFL CD support policies within this chapter. TFL and the GLA have concerns over the parking ratios proposed for industrial use classes. The Council accepts the London Plan standards for business use and had suggested modifications to the Local Plan to reflect this. On the split between different standards north and south of the North Circular Road, the council considers that this is appropriate. It is reflective of the levels of public transport in the areas, parking control measures and use of alternatives to the car. In the area around the West London Orbital, if necessary there will be the opportunity to review the Plan in the future as it will be over 5 years before this project opens.

OPDC identified that the policy on freight could be enhanced by reference to consolidation, whilst Aggregates Industries identified that the Plan could do more to protect and provide rail freight facilities. The Council considers that both these points are valid and has proposed modifications in this respect.

## Other chapters

### Development Vision and Good Growth in Brent

This chapter received 37 comments. This resulted in 4 changes to the document. The GLA, EA, TFL CD, Theatres Trust, and others support this section of the Plan. GLA would like to see a proviso that any developments which currently have permission, but receive additional applications going forward, will be subject to the policies within the new London Plan. This will be included within the updated document. Sports England also requested that an additional criterion be included stating that a sufficient amount of indoor/ outdoor sports facilities will be provided over the Plan period. This will also be included in the updated iteration.

### Delivery and Monitoring

This chapter received 11 comments. This resulted in 6 changes to the document. The CCG have made a number of comments on this section, and the Plan overall. This relates to the lack of consistent reference to the requirement of health infrastructure throughout the Plan. This has since been amended by including an additional criterion for social infrastructure within each Place policy. This, rather than the inclusion of such requirements within site allocations, is considered to be more appropriate as specific sites for additional facilities over those already known have yet to be identified.

A number of additional monitoring measures have also been included. One for the small sites policy (BH4), providing a benchmark of 433 dwellings to measure performance against; and another for poverty and deprivation, which will provide an overall measure of relative policy success against national benchmarks of the Indices of Multiple Deprivation.

## Other Documents

### Tall Building Strategy

This document received 3 comments. This resulted in 1 change. It should be noted that there were also many additional comments on tall buildings, however, these have been categorised under the Tall Building policy (BD3). Quintain support the revised document. STRA do not support the strategy, believing it to be profit-led. The new London Plan promotes the identification of areas appropriate for taller buildings to support required growth. This strategy does this methodically, providing justification as to why each zone has been identified, and how appropriate heights have been reached. This is considered justified and appropriate given the Council's significant housing, and industrial floorspace targets.

St. George have stated that the Alperton Tall Building Zone should be amended to include the Northfields Grand Union site, reflecting extant permission 18/0321. This permission does include a number of buildings which would come under 'tall' as stated within the strategy. Therefore, both the Tall Buildings Strategy and the Tall Buildings Zone for Alperton are proposed for modification.

### Integrated Impact Assessment (IIA)

This document received 5 comments, which resulted in 2 changes to the document. The most significant comments were from the EA. These related to our assessment of sites within Flood Zones 1 and 2 (fluvial). They stated that the existing methodology, both within the IIA and the Strategic Flood Risk Assessment (SFRA) Level 2 are not sufficient in distinguishing between the suitability sites within Flood Zones 1 and 2. Sites wholly within FZ1 should be favoured over sites which are within FZ2 according to national planning policy and the sequential test. This is understood. The Local Plan process has considered this thoroughly, as demonstrated within the SFRA level 2. This notes that the Council is not able to accommodate all of its housing target and other London Plan policy requirements for additional floorspace within FZ1 alone. Therefore it was essential to consider other sites, as were available, and as scored within the IIA assessment. To ensure the IIA is in line with national policy, and the requirements of the EA, the methodology of assessing each site allocation's risk of flooding will be amended, with site assessments amended accordingly. It is not foreseen that this will result in significant changes to site allocations, as the development needs within the borough are significant.

### Infrastructure Delivery Plan

This document received 2 comments. This resulted in 2 changes. One of these was from the Metropolitan Police Service. They have requested we reference the need for Dedicated Ward Offices. These should be delivered through larger sites which are referable to the mayor, and are

situated in identified strategic locations. The document will be updated to reflect this need. The other comment was from Highways England who were not aware of the document. As a result of other representations made by Highways England, the document will include reference to any highway schemes which become evident as the transportation evidence base for the London Plan develops. This will assist the Council in effectively managing its projected growth in relation to strategic transport matters, as will be evidenced and proposed through the London Plan.

## Appendix 1

### **Issues and Options Consultation Documents**

[Consultation Summary February 2018](#)

[Consultation Statement November 2018](#)

### **Preferred Options Consultation Documents**

[Consultation Statement October 2019](#)