



2020

Statement of Common Ground: London Boroughs, OPDC & the Mayor of London

LOCAL PLAN 2020- 2041
BRENT PLANNING POLICY

Contents

Executive Summary.....	2
Parties involved.....	2
Signatories.....	3
London Plan	6
Strategic Geography.....	6
Strategic Matters	7
Housing	7
Tall buildings	8
Protected Views	9
Industrial Land	9
Town centres.....	11
Transport.....	11
Green Infrastructure and Sport Facilities.....	12
District Heating	13
Health.....	14
Waste	15
Gypsies and Travellers	15
Governance Arrangements.....	17

Executive Summary

A Statement of Common Ground is a written record of the progress made by strategic policy-making authorities during the process of planning for cross-boundary matters. It aims to show that the preparation and contents of the draft Brent Local Plan are *'based on effective joint working on cross-boundary strategic matters'*, in accordance with the requirements of paragraph 35 of the National Planning Policy Framework (NPPF). It documents where effective co-operation is and is not happening. It also forms part of the evidence to demonstrate compliance with the 'duty to cooperate'. In London, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.

Some strategic matters overseen by other organisations will be addressed in other Statements of Common Ground. This will serve to make the documents more concise for relevant parties.

Separate documents have been prepared for:

- Transport for London.
- Thames Water and Affinity Water.
- The Canal & River Trust.
- The Environment Agency.

The document is intended to be 'live', updated as circumstances change and agreement occurs on any outstanding issues.

Parties involved

This document will address strategic spatial policies to be addressed directly by collaboration with the relevant Local Planning Authorities. The London Boroughs and Mayoral Development Corporation listed below have been included as they are immediately adjacent to the London Borough of Brent, or make up part of a shared market area. The Council is engaged with them on strategic matters on an on-going basis. The Mayor, due to his strategic planning powers has also been included.

This Statement of Common Ground (SCG) has been prepared by Brent Council to be agreed with:

- London Borough of Barnet
- London Borough of Camden
- London Borough of Ealing
- London Borough of Hammersmith and Fulham
- London Borough of Harrow
- London Borough of Hounslow
- Royal Borough of Kensington and Chelsea
- Old Oak and Park Royal Development Corporation
- London Borough of Richmond
- Westminster City Council
- Mayor of London (represented by the Greater London Authority)

Signatories

London Borough of Barnet agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: 
Position: Planning Policy Manager
Date: April 17th 2020

London Borough of Camden agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: 
Position: Chief Planning Officer
Date: April 3rd 2020

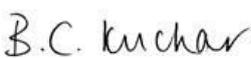
London Borough of Ealing agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: Steve Barton
Position: Strategic Planning Manager
Date: April 3rd 2020

London Borough of Hammersmith and Fulham agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: Matt Patterson
Position: Head of Spatial Planning
Date: April 20th 2020

London Borough of Harrow agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: 
Position: Interim Chief Planning Officer
Date: April 17th 2020

London Borough of Hounslow agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: 
Position: Assistant Director Planning and Development
Date: April 9th 2020

Royal Borough of Kensington and Chelsea agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: 
Position: Acting Deputy Head, Spatial Planning
Date: April 14th 2020

Old Oak and Park Royal Development Corporation agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: Tom Cardis 
Position: Interim Assistant Director of Planning
Date: April 14th 2020

London Borough of Richmond agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: 
Position: Assistant Director Environment and Community Services (Planning & Transport Strategy)
Date: April 3rd 2020

Westminster City Council agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed: Cllr Matthew Green 
Position: Cabinet Member for Business and Planning

Date: April 6th 2020

The Greater London Authority on behalf of the Mayor agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section

Signed Debbie Jackson.

Position Director – Built Environment

Date 09 April 2020

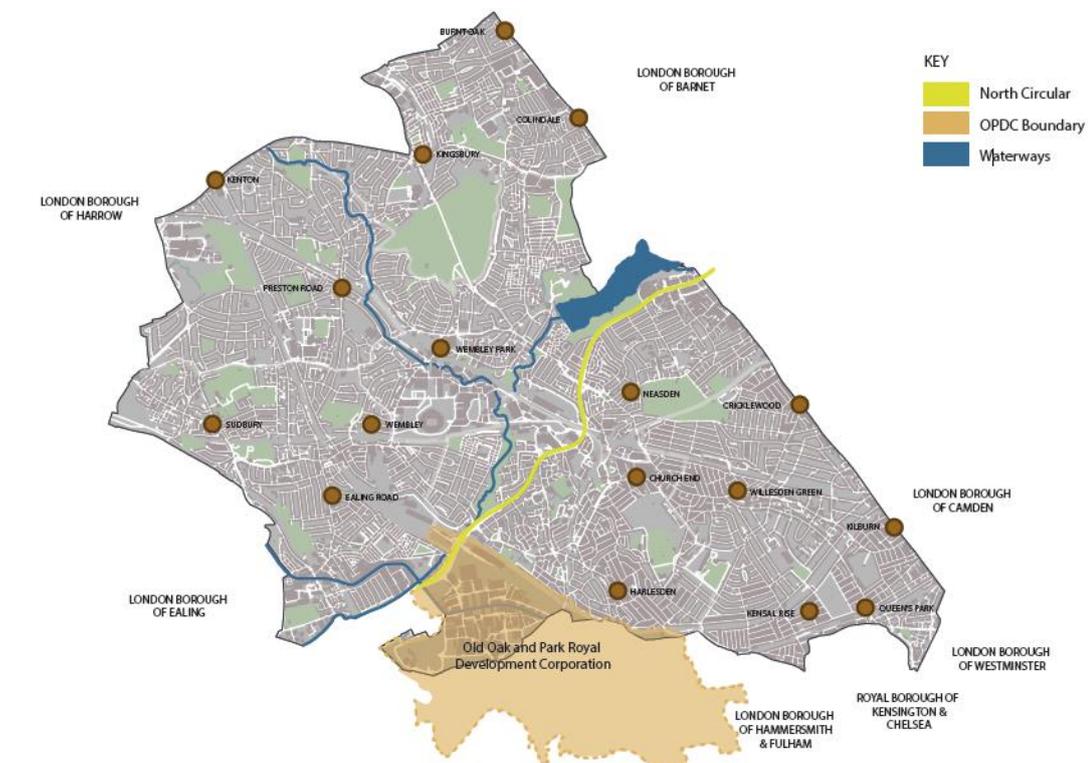
A handwritten signature in black ink, appearing to read 'Debbie Jackson', enclosed in a light grey rectangular box.

London Plan

- 1.1 The London Borough of Brent has been working on the assumption in drafting the Brent Local Plan that a new London Plan (draft issued in December 2017) will be adopted by the time the Brent Local Plan is adopted. This is the version of the London Plan that the Brent Local Plan will seek to be in general conformity with. Reflecting the stage at which the draft London Plan is currently, references to the London Plan in this statement take account of the contents of the Mayor's Intend to Publish London Plan December 2019. The Mayor has also received the response from the Secretary of State to his Intend to Publish London Plan and is considering his response.

Strategic Geography

- 1.2 The London Borough of Brent is bordered by the London Boroughs of Barnet, Harrow, Camden, City of Westminster, Kensington and Chelsea, Hammersmith and Fulham, and Ealing. A portion of the south of the borough is within the Old Oak and Park Royal Opportunity Area. The Old Oak and Park Royal Development Corporation (OPDC), a Mayoral Development Corporation (MDC), has been the local planning authority in this part of the borough since 1st April 2015. The area was identified due to its capacity for intensification, being the only location where the rail lines of High Speed 2 and the Elizabeth Line (Crossrail) meet in the UK. The OPDC was established to enable the area's effective regeneration, helping bring forward a significant number of homes and jobs. The area is directly managed by the Mayor's team within the Greater London Authority, and has strong Duty to Cooperate arrangements with its host boroughs. These include the London Boroughs of Brent, Ealing, and Hammersmith & Fulham.



- 1.3 The London Borough of Hounslow makes up part of the West London Employment Market, as identified within the West London Affordable Workspace Study. The London Boroughs of Richmond and Hillingdon are within the Park Royal/Heathrow Property Market Area for industrial land provision as set out in the London Plan. These boroughs have therefore been included on the grounds of strategic employment land delivery.
- 1.4 These local planning authorities represent the strategic planning area considered in this Statement of Common Ground. They are most likely to be affected by policies in the Brent Local Plan.

Strategic Matters

- 1.5 Strategic matters are those considered of cross-boundary significance arising from the potential impacts of Brent's draft Local Plan. These matters are what this statement will focus on. On each matter it sets out where agreement has or has not been reached and with who.
- 1.6 Further details of how the Local Plan has been informed by ongoing engagement with key partners is set out in the council's Duty to Co-operate Statement. It includes some not party to this Statement of Common Ground.

Housing

- 1.7 The largest issue facing the borough and the Greater London area is the lack of sufficient and affordable homes to meet needs. Consistent with Planning Practice Guidance, Paragraph: 013 Reference ID: 2a-013-20190220, the London Plan is to provide housing targets. This is based on an assessment of the capacity within respective boroughs/MDCs to accommodate additional homes. Each area is required to demonstrate meeting or exceeding their target.
- 1.8 The London Plan sets LB Brent's housing target at a minimum of 23,250 dwellings in the period 2019/20-2028/19. This is the target that the Council will seek to meet and exceed in the Brent Local Plan. The Council considers as evidenced in its Local Plan housing trajectory that it can achieve this minimum target. It can show a 'buffer' of additional potential supply, but considers that any delivery above this challenging minimum target is likely to be small. As such, it will not request that neighbouring local planning authorities indicate whether they have the capacity to meet any of Brent's target, nor will it be in a position to agree to accommodate any shortfall that they might have in achieving their targets.
- 1.9 **Brent, Camden, Ealing, Hammersmith and Fulham, Harrow, Kensington and Chelsea, OPDC and Westminster** agree that in their Local Plans that they will seek to be in general conformity with the London Plan in meeting housing targets, with some boroughs aiming to deliver higher targets.
- 1.10 In terms of affordable housing, **Brent, Barnet, Camden, Ealing, Hammersmith and Fulham, Harrow, Kensington and Chelsea, OPDC and Westminster** all agree to the broad approach set out by the **Mayor of London** in the Intend to Publish London Plan. This is that developments providing less than 35% affordable housing require a viability assessment. All authorities also support the Mayor's strategic target of 50% affordable housing across London, and a threshold of 50% affordable housing on public land. Brent focusses on

London Affordable Rent in the affordable mix where it is allowed discretion consistent with the Mayor's policy. For Build to Rent affordable housing it seeks 100% London Living Rent.

- 1.11 Brent, Ealing, Hammersmith and Fulham and the OPDC in relation to affordable housing delivered in OPDC's area have agreed a nominations policy that will allocate some affordable homes to each of the boroughs. On schemes located within the borough, Brent will nominate to 70% of the London Affordable Rent homes. On schemes located within Ealing and Hammersmith and Fulham, Brent will nominate to 30%.

Tall buildings

- 1.12 The London Plan requires London Boroughs to define and determine if there are locations where tall buildings may be an appropriate form of development. Tall buildings have the potential to impact the character and settings of neighbourhoods outside of their immediate vicinity. The London Plan policy recognises this by identifying boroughs should engage with neighbouring boroughs that might be affected.
- 1.13 Brent has identified Tall Buildings Zones in the draft Local Plan where buildings of 10 or more storeys (around 30 metres) are proposed. It has also identified intensification corridors where buildings of around 5 storeys (around 15 metres) are likely to be acceptable. Within town centres there is the potential to go higher at strategic points. These draft policies do not override the need to consider impacts on local character, heritage assets and other factors which might make tall building proposals inappropriate when submitted as part of a planning application.
- 1.14 **Harrow** agrees to the identification of the Northwick Park Tall Buildings Zone, subject to the consideration of impacts on Harrow on the Hill/ St. Mary's Church. It agrees with the identification of intensification corridors along Harrow Road, Honeypot Lane and Kenton Road, and the Kingsbury and Kenton Town Centres as locations for taller buildings and the associated general height of buildings identified in these locations.
- 1.15 **Westminster** acknowledges the identification of South Kilburn Tall Building Zone, and will continue to work with Brent in ensuring impact upon the surrounding townscape and heritage is reduced as far as practicable.
- 1.16 **Ealing** agrees to the identification of the Alperton Tall Buildings Zone; the Bridgewater Road and Ealing Road intensification corridors as locations for taller buildings; and the associated general height of buildings identified in these locations.
- 1.17 **Barnet** agrees to the identification of the Staples Corner (subject to consideration of views from Golders Hill Park to Harrow on the Hill) and Burnt Oak/ Colindale (considering impact upon Watling Estate conservation area) Tall Buildings Zones; A5 Edgware Road intensification corridor; and the Burnt Oak, Colindale and Cricklewood Town Centres as locations for taller buildings, and the associated general height of buildings identified in these locations.
- 1.18 **Camden** acknowledges the identification of Kilburn High Road Town Centre as a location suitable for heights of up to 5 storeys, with potential to go slightly higher at strategic points, assuming the buildings are of high quality design, and consider local context thoroughly.

- 1.19 **OPDC** agrees to the identification of Stonebridge Park Tall Buildings Zone and the Harrow Road town centre as locations for taller buildings, and the principle of the general height of buildings identified in these locations as being acceptable.

Protected Views

- 1.20 The London Plan states the Boroughs should clearly identify local views in their Local Plans. Since the development of the National Stadium Wembley, Brent Local Plan has identified a number of local views to it that it considers are worthy of protection. The number has increased in the draft Local Plan from 13 to 17. Two views originate in adjacent areas. These are Horsenden Hill, Perivale in the LB Ealing, and Abbey Road/ Grand Union Canal Park Royal within the OPDC area (within London Brent boundary).
- 1.21 **LB Ealing** agrees to the identification of the panorama view of the National Stadium Wembley from the metropolitan open land of Horsenden Hill, Perivale.
- 1.22 **OPDC** supports the identification of the Abbey Road/Grand Union Canal Park Royal view, however, identify that the view should only be considered from the boundary of Brent's planning area.

Industrial Land

- 1.23 London Plan policy looks to ensure the appropriate function and the sufficient supply of industrial land. Strategic evidence indicates Brent should provide additional floorspace to support the effective function of London's economy. The London Plan identifies Brent as part of a Park Royal/Heathrow Property Market Area for industrial purposes.
- 1.24 Within Brent the draft Local Plan identifies additional capacity will essentially come forward on existing industrial land. This includes Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Local Employment Sites. Capacity will be generated through greater intensification of use through additional floorspace. The Council has been unable to identify other significant sources to provide for additional industrial capacity. This is due to other London Plan policy requirements, such as delivering a substantially increased housing target), and social infrastructure to support population growth, whilst protecting open spaces. An Industrial Land Audit has been undertaken to support draft Local Plan policy BE2. This Audit identifies potential capacity from intensification going forward.
- 1.25 Brent, as part of the West London Alliance, has collaborated with the London Boroughs of Barnet, Ealing and Harrow on the West London Employment Land Evidence. This considers the future needs of commercial and industrial B use class employment floorspace and land in the study area. It also assesses the degree to which these can be met through policy responses. This study has also helped to inform draft Local Plan policy BE2.
- 1.26 The evidence base to support the London Plan identified industrial land demand for the Park Royal/ Heathrow property market area by borough's administrative areas, rather than local planning authority areas. As such, it will be for Brent and Ealing to each agree between them and OPDC what a suitable supply of industrial land is. Evidence to support OPDC's draft Local Plan submitted for examination in 2018 identified significant potential for

intensification at Park Royal. However, since then there have been substantial changes in circumstances, which will require a modifications to elements of the submitted OPDC Local Plan in relation to land use designations. This will result in a re-evaluation of potential industrial land capacity. This work is unlikely to be completed until late 2020. Although, OPDC is not able to provide a specific quantum of industrial floorspace to Brent, OPDC will continue to work with the Council to assist in providing an increase in industrial floorspace capacity for both local planning authorities.

- 1.27 **The Mayor** has identified general conformity concerns with LB Brent's approach to lack of clarity on how a suitable supply of industrial land will be delivered and the approach to proposed co-location and intensification on SIL locations. The Council is committed to ensuring that the London Plan's requirements to ensure the intensification or the re-provision of the existing amount of floorspace on site will be delivered on SIL and LSIS sites. It has identified that Masterplans will be developed for SIL and LSIS designations where it has identified co-location as being acceptable in principle. The Brent Housing Trajectory makes no assumptions about housing delivery being achieved on SIL sites in the next 10 years and assumes relatively low figures for LSIS sites due to the need to masterplan. As such LB Brent considers that work such as the Staples Corner and LSIS masterplans will allow the GLA, LB Brent and others (such as LB Barnet) to co-operate and consider how development can achieve the increase in industrial capacity that the London Plan industrial policies promote.
- 1.28 Brent considers that it has put forward a positive policy framework to support intensification of industrial land. Nevertheless, it has concerns about the viability/ deliverability of industrial intensification of the scale required to meet the demand set out in the London Industrial Demand Study 2017. As such, whilst through the Industrial Audit it can show that there are sufficient sites to deliver the uplift in industrial floorspace capacity, it is not confident that it can deliver such a significant uplift in industrial capacity over the Plan period.
- 1.29 The **OPDC and Brent** will work together to identify the amount of industrial capacity that can realistically be delivered over the Plan period to assist in ensuring a sufficient supply of industrial floorspace. The London Boroughs of **Barnet, Camden, Ealing, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow, Kensington and Chelsea, Richmond and Westminster** will all seek to be in general conformity with London Plan industrial land policies. Whilst this may increase industrial land capacity, currently none of these boroughs are in a position to identify the extent of any additional provision that will help meet London's wider needs.

Town centres

- 1.30 The following town centres in Brent also extend across one or more boroughs: Burnt Oak, Colindale, Cricklewood, Kilburn, Kingsbury, Kenton and Queens Park. Both Kilburn and Wembley Town Centres are classified as Major centres, serving a wider catchment than Brent. The London Plan also identifies the night-time economy of Wembley of national/ international importance. Kilburn, Cricklewood and Wembley Park are identified as of more than local importance in respect of the night-time economy.
- 1.31 LB Brent commissioned the Retail and Leisure Needs Assessment (2018) which has helped inform its policies in the draft Local Plan. The study was designed to ascertain current town centre uses and catchment. Taking in a wider view than the borough itself, it determined how the centres should develop to remain vital going forward. Primary conclusions from the study show that in order to increase vitality, centres need to be consolidated. They need to increase flexibility in their secondary peripheral frontages to provide supporting uses, such as offices and residential, which will increase local footfall during complementary hours. Increased flexibility of centres will also allow for a greater emphasis on entertainment and leisure, which will serve as a draw, attracting residents from a wider catchment.
- 1.32 **Harrow, Barnet, Camden, Westminster, and the OPDC** all agree to collaborate on the strategic development of shared/ neighbouring town centres and to support the hierarchy of town centre's as identified in the London Plan.

Transport

- 1.33 Many journeys within Brent do not begin and end in the borough. It is therefore imperative that the Council works with strategic stakeholders and neighbouring boroughs to ensure that its infrastructure is managed appropriately. The primary emphasis in current planning policy, and therefore in Brent's new Local Plan, is on facilitating greater use of public and active transport and limiting car use in order to achieve the Mayor's mode share targets of 2041. This is particularly important in light of projected population growth.
- 1.34 Increasing the mode share of sustainable modes of transport, namely public transport, walking, and cycling, to 80% by 2041 is a priority within the draft London Plan and the Mayor's Transport Strategy (MTS). To achieve this aim overall in London, Brent is required to achieve a mode share of 66% by 2021 and 78% by 2041. The draft Local Plan includes policies that seek to reduce car use, referencing the need to adhere to London Plan car parking standards for residential and retail development. This will be essential to achieve mode share targets and tackle congestion, pollution and safety concerns on the road network as a whole. Ensuring suitable measures to reduce accessibility to personal vehicles is a key component in achieving active transport targets. Draft London Plan policy outlines that developments in areas with a PTAL of 4 or greater should be considered for car free development, subject to a Controlled Parking Zone being in place or achievable within the wider area. This will need to be considered strategically, so as to not displace parking from one area to another.
- 1.35 Brent is working closely with its partners including TfL, the West London Alliance and WestTrans to improve public transport access. A key priority is to improve orbital links from east to west through the West London Orbital (WLO) rail link. The link would use the existing

Dudding Hill freight line to create an Overground passenger line connecting Hounslow in the west to Hendon and West Hampstead in the east via Old Oak Common Lane (new Overground station), Harlesden, Church End, Neasden and Brent Cross West (Thameslink station). The strategic outline business case for the WLO was published by TfL in June 2019. The council will continue to work closely with TfL and boroughs forming the West London Alliance to facilitate the delivery of the WLO.

- 1.36 In addition, the council will continue to work with neighbouring local planning authorities, including Barnet and OPDC, to ensure improved connections are created from within the borough to proposed stations on its boundary including Brent Cross West Thameslink Station, the HS2 and Elizabeth Line station at Old Oak Common and the new Overground station at Old Oak Common Lane. To the north of the borough the priority will be to enhance the coverage and frequency of the bus network. Given that personal vehicles are the largest contributor to poor air quality in Brent, these measures will also reduce congestion and go some way toward improving the air quality of the borough, and that of the Greater London area.
- 1.37 Brent supports and shares the Mayor's objectives and includes within its draft Local Plan a number of policies, which will serve to strengthen these objectives in the area of Brent.
- 1.38 **Brent, Harrow, Barnet, Camden, Westminster, Kensington and Chelsea, Hammersmith and Fulham, the OPDC, Hounslow and Ealing** all agree with the Mayor's objectives to increase the mode share of sustainable modes of transport and work to ensure developments within their area will meet this aim. Where strategic (such as WLO) or more localised cross border solutions for transport infrastructure are required (such as at Staples Corner), boroughs will work with their neighbours and if necessary bodies such as Network Rail, TfL and Highways England to consider how these are best addressed.

Green Infrastructure and Sport Facilities

- 1.39 Brent has recently undertaken an Open Space Study to provide a spatial analysis of existing open space, its quality, typologies, and associated deficiencies. Much of the areas of open space deficiency are within the south of the borough, concentrated around the more deprived areas. It would be beneficial for Brent and its neighbouring boroughs to the south and south east to work together to reduce open space deficiency overall. In Brent major new developments will be expected to provide new open space, or financial contributions to provide off-site if not feasible on-site. In reality much of this, due to limited land availability, will be of local importance. Such measures will act to increase the delivery of green space as a multi-functional asset, serving local residents and wildlife alike.
- 1.40 With regards to sports facilities, the Council has worked closely with Sport England and associations in updating its evidence base in relation to outdoor playing pitch provision and indoor sports facilities. There are enough playing pitches to meet future demand for football, cricket and hockey. For rugby there is a deficiency. All sports require better management of pitch quality. With the exception of hockey, there was a need for additional artificial pitches in the future.
- 1.41 For indoor facilities, Brent performs poorly in relation to availability of swimming pools. Provision is well below needs currently, with the gap predicted to widen. Sports hall provision is better, but there is a current under-provision which will be exacerbated by increases in population. New and additional facilities to be provided are likely to address the

sports hall needs through schools, which will be facilitated through ensuring community use agreements. A deficiency in swimming pools is predicted to exist despite the likely significant investment in new pools.

- 1.42 There is and will continue to be cross-boundary use of green spaces and sports facilities. The Council will through its planning policies, using its own facilities and working with partners seek to address the need for additional sports facilities. It will seek to best meet the needs of the future population to ensure that facilities users are not diverted to other boroughs.
- 1.43 **Ealing, the OPDC, Hammersmith and Fulham, Kensington and Chelsea, Westminster, Barnet, and Camden** all seek to provide sufficient open space and sports facilities in association with new development to meet additional needs created. Where cross border demands are created, boroughs will work with their neighbours to consider how these are best addressed.

District Heating

- 1.44 In order to be net zero carbon by 2050, the draft London Plan has placed great emphasis on the use of renewable energies, decentralised energy networks, and combined heat and power systems. Brent therefore requires that developments within Growth Areas establish District Heating networks, and that all developments within that area be connected to it. Such networks have potential to benefit developments outside of Brent and should therefore be considered strategically. There might be opportunities in Burnt Oak/Colindale, Brent Cross/ Cricklewood and South Kilburn given the size of developments in LB Brent and in adjoining boroughs in those locations for cross-boundary networks.
- 1.45 Harrow in particular has outlined its interest in establishing a joint District Heating Network with the Northwick Park Growth Area. These efforts will reduce our reliance on fossil fuels and centralised energy networks, and allow for developments to benefit from both the heat and the energy generated from a system.
- 1.46 **Harrow** agrees to collaborate with Brent to scope out the potential for the provision of a district heating network at Northwick Park, and its potential linking to developments within the Harrow on the Hill Growth Area.

Education

- 1.47 School catchment areas cross borough boundaries. In addition to this, pupils and parents have the right to choose which school they attend even if it is outside of their catchment. This makes education, and the provision of educational facilities of strategic cross boundary significance.
- 1.48 Brent Council maintains close contact with its neighbours regarding school place planning. The Council is represented on the ALDCS School Place Planning Network and the GLA School Roll Projections Liaison Group, both of which meet three times per year. These sessions cover London-wide school place planning issues and focus on recent trends and future developments. Brent is also represented at the West London Place Planning group, which is explicitly run to discuss more local issues between the boroughs in the West of London. Discussions are held about shortage or surpluses of spaces and the strategies individual boroughs are addressing to tackle these. Where there may be a cross-border impact, these issues are also discussed. Local contact with School Place Planning officers in neighbouring

boroughs is also maintained, including discussions on joint implications and school place requirements likely to result from the OPDC development, which spans the boroughs of Brent, Ealing and Hammersmith & Fulham.

- 1.49 Brent currently has sufficient primary school places to meet projected need within the period for which school place planning takes place. This need is expected to increase given the latest GLA projections over the Brent Local Plan period. Further capacity may be required in the borough's Growth Areas where population will increase significantly.
- 1.50 Brent currently requires additional secondary school places to meet the needs of the growth in primary school pupils progressing through the system. It has identified how this capacity will be created, through the provision of at least one new school in the south of the borough and expansion of two others. Brent has historically been a net exporter of secondary school pupils. Neighbouring boroughs are facing similar capacity issues with secondary school provision. Therefore Brent pupils may find it increasingly difficult to claim positions outside of the borough, as they are prioritised for those within the catchments. If parental preference patterns change, and Brent secondary schools become more popular with Brent residents, there may be additional capacity which will need to be accommodated.
- 1.51 The Council intends for a minimum of 60% of this growth to take place in designated Growth Areas. A number of these areas are immediately adjacent to the borough boundary, including: Northwick Park, Burnt Oak and Colindale, Staples Corner, South Kilburn, and Alperton.
- 1.52 **Brent will continue to work with its neighbouring boroughs, particularly those adjacent to the borough's Growth Areas, including Harrow, Barnet, Westminster, Ealing, and the OPDC** in seeking to meet educational needs across the strategic area through the provision of new or improved facilities.

Health

- 1.53 Healthcare is provided at a number of levels, including acute care which is generally delivered by hospitals, and primary care, principally delivered by General Practitioner (GP) surgeries, overseen by Brent CCG. Depending on their size, and specialities, each facility will service a certain catchment. These catchments are not restricted by the borough boundary, with facilities such as Northwick Park hospital serving a much wider catchment. This is reflected by the structure of the National Health service itself, being broken up into a number of convenient geographies to reflect local needs. Brent is included within the Central and North West London National Health Service Foundation Trust. This trust allocates investment in the area as is proportionate to need. The areas are further split up into the larger Federations, and the more localised Primary Care Networks. This demonstrates the strategic nature of health infrastructure.
- 1.54 Some of the existing infrastructure within Brent is dated, does not meet modern standards, and is unfit for purpose. Current population figures indicate GPs are over-subscribed by 14%. This will take significant investment to bring up to standard and meet existing and future demands. As in paragraph 1.51, health infrastructure will be in the highest demand in areas anticipating significant population growth. Sites have been identified for delivery of three new large practices at Wembley, Alperton and South Kilburn. The Council has worked with the Trust to support masterplanning at Northwick Park and (led by OPDC) at Central Middlesex Hospital with a view to meeting operational needs of the Foundation Trust and Brent CCG. The Council will continue to work with the Trust and CCG to plan for required

health care provision. These organisations in turn will also need to collaborate with GP practices and their adjoining counterparts.

- 1.55 As well as working with the healthcare sector, **Brent will continue to work with its neighbouring boroughs, particularly those adjacent to the boroughs Growth Areas, including Harrow, Barnet, Westminster, Ealing, and the OPDC** in seeking to meet strategic health infrastructure requirements. This will be particularly so for those facilities required through demand created by new development across the area.

Waste

- 1.56 The London Plan increases the waste apportionment target for Brent and its neighbouring boroughs. Brent is part of the West London Waste Planning Group that consists of Ealing, Harrow, Hillingdon, Hounslow, OPDC and Richmond-upon-Thames. All these local planning authorities adopted the West London Waste Plan in July 2015. The document sets out policies to ensure sufficient sites to address waste planning needs of those areas. Due to specialisms, e.g. mineral oil recycling, the identified waste sites also deal with waste from a number of other London boroughs.
- 1.57 **Camden and Barnet are part of the North London Waste Planning Group.** The North London Waste Plan is currently subject to Examination. The North London Waste Plan constitutes the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington, and Waltham Forest. The NLWP is committed to ensuring the effective coordination of waste management throughout this and the wider London area, and to maintaining a monitoring function that will ensure engagement in Duty to Cooperate post adoption. Hammersmith and Fulham, Westminster and Kensington and Chelsea deal with waste in individual local plans.
- 1.58 **Brent envisages that it will work together with its existing partners of Ealing, Harrow, Hillingdon, Hounslow, OPDC and Richmond-upon-Thames to produce an update to the West London Waste Plan, although there is no formal agreement of indicative timetable for its renewal currently.** Through this process it will engage with neighbouring boroughs and their joint representative bodies such as the North London Waste Group. In advance of the new waste plan, the Council is not in a position to identify whether additional facilities will be required in the borough, or whether potential increases in efficiencies on existing/allocated sites will be sufficient to deal with increases in capacity need resulting from its own London Plan apportionment target, or wider West London's needs.

Gypsies and Travellers

- 1.59 The London Plan sets out that boroughs must meet the identified need for permanent gypsy and traveller pitches and include 10 year targets in their development plans. On the basis of evidence from 2008, which uses a different definition of a Gypsy and Traveller, it sets out the identified need for pitches in Table 4.4. For Brent this is 18 additional pitches.
- 1.60 Brent in association with Barnet, Ealing, Harrow, Hillingdon and Hounslow published a West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment in 2018. This took account of both the national and London Plan definition of Gypsies and Travellers. Across West London, for the national definition a modest uplift was required of 20 pitches, whilst for the London Plan definition a substantial need of 224 additional pitches

was identified. For Brent the requirements are 0 and 90 respectively. The London Plan Panel recommended that the London Plan adopted the national definition of a Gypsy and Traveller. This was consistent with MHCLG representations on the London Plan and is subject to a Direction from the Secretary of State on the Intend to Publish London Plan. Brent has an enabling policy in its Local Plan with defined areas of search (Growth Areas) identified for Gypsy and Traveller sites. Currently, it does not consider that it will seek to request provision of its resulting needs in neighbouring boroughs.

- 1.63 Given existing constraints, **LB Hounslow** is seeking to meet its own Gypsies, Travellers and Travelling Showpeople needs within its Plan period, but will not be able to accommodate unmet need from LB Brent.

Governance Arrangements

- 2.1 Requirements for the signing of documents differ between Local Authorities depending on their structure. It will be for each body to decide who is the appropriate person to sign the Statement.

Engagement to date

- 2.2 The information and actions outlined in this statement have been informed by various evidence base documents, and through on-going engagement between signatories. In addition to Duty to Cooperate meetings, the Council also regularly partakes in the Association of London Borough Planning Officer (ALBPO) and West London Alliance Planning Policy Officer meetings.

Engagement going forward

- 2.3 This statement focuses on the impact of spatial policies within the new Brent Local Plan. The impacts from adjacent London Boroughs will be considered in their respective Statements. This improves the fluidity of the document, allowing it to be updated efficiently whenever necessary.
- 2.4 To ensure continued effective collaboration between signatories, Brent will ensure that the document is updated at appropriate intervals. The information acquired through regular meetings with signatories, including Duty to Cooperate, ALBPO and WLA meetings, in addition to strategic consultation events and on-going communications via E-mail, will serve to permit this.