

## Examination of the London Borough of Brent Local Plan

Inspectors: Christa Masters MA (Hons) MRTPI and Andrew McCormack BSc (Hons) MRTPI  
Programme Officer: Andrea Copsey  
Email: [copseyandrea@gmail.com](mailto:copseyandrea@gmail.com)  
Telephone: 07842 643988

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Paul Lewin  
Team Leader Planning Policy  
London Borough of Brent  
Brent Civic Centre  
Engineer's Way  
Wembley  
HA9 0FJ

By email only

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Dear Mr Lewin

### Examination of the London Borough of Brent Local Plan

As you will be aware, we have been appointed to examine the Brent Local Plan ('the plan'). We have been undertaking our initial review of the document and the supporting evidence base. That work remains ongoing. However, in order to progress the examination, we have identified a number of matters upon which we are seeking clarification from the Council.

#### General Matters

Thank you for the statements of common ground which you have submitted. The submission also refers to statements of common ground which the Council anticipate being prepared with both the Environment Agency and Highways England. It also refers to the preparation of a number of additional papers to cover matters such as Gypsies and Travellers. The submission also refers to the preparation of a paper to cover the conformity of the plan with the London Plan.

In order to progress the examination, we require clarification as to when these documents will be provided. As a result, we would be grateful if you could provide a timetable for producing these documents.

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Programme Officer: Andrea Copsey  
Examination Office, PO Box 12607, Clacton-on-Sea CO15 9GN

### Air Quality

Policy BSU12 relates to air quality and refers to Brent's Air Quality Action Plan and allocates an air quality management area. Does the air quality action plan form part of the evidence base? If not where is the evidence to support this designation?

### Viability work

The submission letter refers to the preparation of an updated viability assessment. We are seeking clarification as to the precise reasoning for preparing this update. We note from the representations that two particular concerns have been raised:

- the existing viability work does not consider sites over 500 dwellings;
- whether the existing viability work adequately justifies the application of the affordable workspace threshold identified at policy BE1.

Does this cover all of the matters which will be addressed by preparing this update or are there additional matters which the update will cover? What is the timetable for producing the update?

### Flood Risk

It is noted that there are concerns raised by the Environment Agency (EA) relating to the Council's approach to the sequential and exceptions testing of site allocations and intensification corridors in the plan and the Strategic Flood Risk Assessment Level 2. Is the Council satisfied that the overall methodology and approach to undertaking sequential and exceptions testing is sufficiently robust?

Furthermore, we note that the Council has sought to address this by revising the relevant documents and has sought the views of the EA on these which, we understand are still awaited. Please ensure these matters are covered in the statement of common ground which is being prepared.

### Transport

So far as we can see, the transport evidence comprises:

- Brent Cycling Strategy 2016-2021

- Brent Walking Strategy 2017-2022
- Brent Long Term Transport Strategy (LTTS) 2015-2035
- Draft Local Implementation Plan 3

Is this list correct? If it is, is the Council content that this evidence base provides an up to date justification for the transport related aspects of the plan outlined within chapter 3 of the plan, the development vision to tackle congestion around the North Circular and the active and sustainable travel objectives set out at policy BT1? In raising this, we note the representations made by Highways England in relation to the effect of the plan on the strategic road network.

Please could you explain the correlation between the documents listed above and the plan period 2020-2041?

We note that the LTTS advises that the first full review of this document will take place in 2020. Please provide an update in relation to this timeframe.

### **London Plan**

We acknowledge the current position regarding the examination of the Draft London Plan, the examination panels recommendations, the Secretary of State's Direction and the response to these by the Mayor of London. Notwithstanding this position, we seek clarification in relation to the following matters:

#### Housing

The Statement of Common Ground submitted indicates that the plan target for Brent will be to deliver a minimum of 23,250 dwellings between 2019/20 and 2028/29. Is this correct? If it is correct, what figure is the Council using for the remainder of the plan period from 2029/30 to 2041? In light of the current situation regarding the London Plan does the Council consider its housing target to be appropriately justified by the supporting evidence base and if so, why?

With regard to small sites, we note that the Draft London Plan Panel Report recommends that the contribution of such sites towards housing targets across London boroughs is revised down by about two thirds. In Brent's case this would revise down the small site

housing target from 1,023 to 433 dwellings per annum. However, the Council has indicated that it is able to deliver around 370 dwellings per annum to 2029 through small sites. Where precisely is the evidence concerning small site delivery rates and is it sufficiently robust?

#### Employment

We note the concerns raised by the GLA in relation to the industrial policies – both site specific allocations regarding existing industrial land and more generally in relation to the evidence base. Is the Council satisfied that the evidence base and in particular the methodology used within the West London Employment Land Evidence is sufficiently robust?

#### Next Steps

We have asked a number of questions and appreciate that the current very difficult circumstances in respect of coronavirus may mean that the Council resources are stretched. We ask that you contact the programme officer when you are able to do so to advise of the likely timescales involved in responding. Should you require clarification on any of the points raised, we would be happy to elaborate.

Once we are in receipt of your reply and have a clear indication on the timeframe for producing the documents referred to, we are hopeful that we will be in a position to set out the matters and issues which will form the focus of the examination of the plan.

We look forward to hearing from you at the earliest opportunity. In the meantime, please ensure that a copy of this letter is placed on the examination webpage.

Yours sincerely

*Christa Masters and Andrew McCormack*

Inspectors