

London Borough of Brent

Examination of the Brent Local Plan

Schedule of Matters, Issues and Questions for the Examination

14 July 2020

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Introduction

Following our initial examination of the Brent Local Plan (the Plan) and the supporting material, we set out below the main Matters, Issues and Questions regarding the soundness of the Plan. These should be read in conjunction with the Guidance Note for people participating in the examination issued on 14 July 2020.

As highlighted within the Guidance Note, participants should be aware that the Council have published a number of additional documents to their evidence base which are located on the examination website and which representors may wish to take into account in their responses below. The Council have also produced a schedule of modifications (ref: 'Core_04') as well as the Council's response to the Inspectors initial comments and questions (ref: 'PINS_01' and PINS_02'). Agendas for the individual hearing sessions will be issued before the hearings commence.

The questions identified below concerning soundness are primarily focussed on the Plan's policies. Insofar as they relate to the Plan's soundness, other elements of the Plan including the supporting text will be considered as part of the discussion of the relevant policies. Apart from the Council, there is no obligation for participants to produce hearing statements. **You should only do so if there is something to add to your original representation - do not repeat what is in your original representation, just provide a cross reference to it where necessary.** The Inspectors will determine the manner in which discussions take place at the hearings. As identified within the Guidance Note, all references below to the National Planning Policy Framework are to the February 2019 version. Where respondents answering the following questions identify a deficiency in the Local Plan they should make clear how it should be changed.

Matter 1 – Legal and procedural requirements

Main Issue: Have the relevant legal and procedural requirements been met in the preparation of the Plan and is the Plan legally compliant?

Questions

Duty to Cooperate

- 1.1 Overall, has the Plan been prepared in accordance with the 'duty to cooperate' imposed by Section 33A of the Planning & Compulsory Purchase Act 2004, as amended (the PCPA)?
- What are the strategic, cross-boundary issues of relevance to the Plan and how does the Plan's strategy address them?
 - What has been the nature of the cooperation undertaken and on what issues has this focused?
 - What actions have been taken in relation to the 'duty to cooperate'?
 - In preparing the Plan did the Council engage constructively, actively and on an on-going basis with neighbouring authorities and other relevant organisations on cross-boundary issues in respect of the 'duty to cooperate'? In asking this question, the Inspectors note the signed statement of common ground with the neighbouring London Boroughs as well as the Old Oak and Park Royal Development Corporation and the Greater London Authority.
 - What have been the outcomes of the actions taken in relation to the 'duty to cooperate' and how does the Plan address those outcomes?

In responding to the above questions, the Council is asked to provide detailed evidence to support its position with reference to the timing and preparation of the Plan.

Sustainability Appraisal and Habitats Regulations Assessment (Integrated Impact Assessment)

- 1.2 The Council's Integrated Impact Assessment (IIA) includes the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). Are the likely environmental, social and economic effects of the Plan adequately and appropriately assessed by the IIA?
- 1.3 Do the housing figures set out on page 514 of the IIA accord with the figures that the Council now rely upon in the Plan? If not, why?
- 1.4 Does the SA adequately and appropriately assess all of the sites in relation to flooding, is this assessment of sites sufficiently robust, justified and sound? In this regard, the Council is requested to clearly set out how precisely the Strategic Flood Risk Assessment has been used to inform the SA.
- 1.5 Has the formulation of the Plan been based on a sound process of SA? Has the SA set out within the IIA provided an adequate consideration and testing of reasonable alternatives? Is it clear how the SA has influenced the final Plan?

- 1.6 Has the Plan been formulated on a sound HRA process and is the Council's conclusion that a comprehensive appropriate assessment is not required justified? Given the Council's conclusion in the IIA that no mitigation measures are required in response to the Plan and its proposals, and that none are identified, has Natural England confirmed that the information and evidence provided and the assessment set out in the IIA is sufficient, robust and justified and that the conclusions of the IIA in this respect are supported?
- 1.7 Given the concerns raised by a number of respondents, does the IIA and the Plan adequately and appropriately assess and address the identified issues of air quality such as improvements in energy efficiency, net zero-carbon emissions and short-term and long-term health impacts? What evidence is there to support this?
- 1.8 Has the IIA been undertaken in accordance with all the relevant Regulations (including SA and HRA) and the National Planning Policy Guidance? Overall, is the IIA adequate in its expression of why the Plan's preferred strategy and policies were selected?

Other legal requirements

- 1.9 Taken as a whole, does the Plan include strategic policies - or a spatial development strategy which contains policies - to address the identified strategic priorities of the Plan area, in accordance with Section 19(1C) and (1D) of the PCPA? If not, why?
- 1.10 Is the Plan legally compliant in terms of how it seeks to address climate change? Does the Plan include policies designed to secure the development and use of land in the Borough which contributes to the mitigation of, and adaptation to, climate change as required by Section 19(1A) of the PCPA?
- 1.11 Has the Plan been prepared to be in general conformity with the London Plan?
- 1.12 Has the Plan been prepared in accordance with the Council's Statement of Community Involvement (SCI) and met the minimum consultation requirements in the relevant Regulations?
- 1.13 Does the Plan accord with the Council's Local Development Scheme (LDS) and has the consultation carried out during its preparation been adequate?
- 1.14 Is the geographical illustration of all relevant policies and proposals within the Plan adequately and correctly shown on the submission policies map?

Matter 2 – Vision, strategy and objectives

Main Issues: Does the Plan identify a Vision and Strategy for the Borough and is the preferred approach appropriately justified?

Are the strategic objectives justified and in accordance with national policy and the London Plan?

[Policy DMP1 and Section 4 of the Plan]

Questions

- 2.1 With reference to section 4 of the Plan - Development Vision and good growth in Brent, which are the strategic policies? Does the 'Development Vision' provided on page 28 of the Plan, and its supporting text on pages 28 and 29, provide an appropriate framework for the policies set out in sections 4, 5 and 6 of the Plan? Are the strategic objectives of the Plan clearly set out, adequately explained and are they consistent with national planning policy and the London Plan? If so, please explain precisely how?
- 2.2 Is the Plan's 'Key Diagram', set out in Figure 6 on page 29, sufficiently clear and effective in illustrating the Council's strategic development vision for the Borough?
- 2.3 Section 4 and the 'Development Vision', in effect, broadly repeats the London Plan's six core 'Good Growth' objectives. Is this approach consistent with the Framework which advises that local plans should not repeat existing policies?
- 2.4 Notwithstanding the above, the 'Development Vision' does not align with the specific detail of the London Plan 'Good Growth' objectives. For example, under the heading 'making the best use of land' in the London Plan, eight specific measures are identified. The submitted Plan outlines three measures. Therefore, is it accurate to purport that the Plan reflects these Good Growth policies? How have the specific measures in the Plan been selected?
- 2.5 Does the Plan adequately address the issue of neighbourhood planning? In particular, in terms of the identified 'Intensification Corridors' and the development of 'Vale Farm' as a regional centre for sports excellence, does the Plan conflict with the policies and aims of the Sudbury Town Neighbourhood Plan?

Matter 3 - Flood risk

Main Issue: Is the Plan's approach to flood risk consistent with national policy? If not, is there evidence that there are local circumstances which justify it?

Questions

It is acknowledged that the Council and the Environment Agency (EA) are to provide further information and work on these matters, as referenced in the Council's submission letter, dated 17 March 2020 and its response to the Inspectors initial queries, dated 5 May 2020. However, in addition to addressing the questions set out below, we request a statement of common ground between the Council and the EA which should be submitted with the responses to the questions below.

- 3.1 The EA has concerns regarding the Council's approach to, and methodology relating to its assessment of, flood risk and a lack of evidence demonstrating that all proposed site allocations and intensification corridors within the Plan have passed sequential and exceptions testing in accordance with Planning

Practice Guidance (PPG). Have the site allocations of the Plan been appropriately tested in this respect and has this been undertaken in accordance with the PPG?

- 3.2 What evidence is there to support the Council's methodology and approach set out in its Strategic Flood Risk Assessment Level 2 (SFRA2)? Is the SFRA2 evidence and assessment of the likely effects of the Plan's allocations adequate, appropriate, effective, justified and sound in this regard?
- 3.3 In relation to EB_SI_03 - Sequential and Exceptions Test, March 2020, does the methodology clearly follow the steps identified within the PPG? If not, what are the differences and is the approach justified?
- 3.4 Does the evidence base support the position that there are no other reasonable options to meet the Council's development land targets other than to allocate sites within fluvial Flood Zone 3? If so, is this approach consistent with national policy? What evidence is there to demonstrate that this approach will not increase the risk of flooding to people or property on or off-site?

Matter 4 – Strategic transport, infrastructure and delivery

Main Issues: Does the Plan take a justified and suitably evidence-based approach to strategic transport, infrastructure and delivery across the Borough?

Is the Plan and its policies sufficiently positive, consistent with national policy and the London Plan in this regard and effective in terms of implementation?

Is the Plan based on suitably robust evidence-based viability assessments?

Does the Plan comply with national policy and guidance in this regard?

[Policies BT1, BT2, BT3 and BT4]

Questions

Strategic transport

- 4.1 Has the approach to transport matters and the related policies set out in the Plan been positively prepared and are they reasonable, justified, effective and consistent with national policy, guidance and the London Plan?
- 4.2 Are the transport-related policies in the Plan based on reasonable, robust, and up to date evidence?
- 4.3 Given the high level of development proposed within the Plan, does the evidence base relied upon to support this level of development within the Borough include an adequate assessment of the impact that the proposals would have on the Strategic Road Network (i.e. a Strategic Transport Assessment)? If not, why?
- 4.4 If no Strategic Transport Assessment has been undertaken as part of the Council's evidence base, is the Plan considered to be justified, effective and sound in this regard and consistent with national policy?

- 4.5 Does the Plan, in terms of its transport approach, adequately and appropriately take into account wider transport matters such as the West London Orbital rail line and connections within the Borough to wider bus and cycle networks?
- 4.6 Is the overall approach to transport and the related policies in the Plan accepted and supported by Transport for London?
- 4.7 With regard to the representations made on behalf of St George, does policy BT2 provide a sufficient level of clarity and flexibility in relation to identifying or defining where Controlled Parking Zones can be achieved and the criteria for doing so? Is this approach justified, effective and consistent with national policy, guidance and the London Plan in this regard?

Infrastructure and delivery

The Infrastructure Delivery Plan (IDP) provides a useful starting point. However, it is not sufficiently detailed in order to be able to understand infrastructure requirements for each of the site allocations proposed. It also refers to Local Plan phases 1, 2 and 3 with no clear explanation as to what these are. As a result, it would be helpful if the Council could produce a table showing the level of anticipated housing delivery in each of the defined 'Places' on a year by year basis, with reference to the site allocations as necessary (including policy references so these can be cross referenced with the Plan) along with identifying the infrastructure needed to support the new homes identified. The table should also indicate the likely costs and funding sources. This should include all infrastructure requirements as envisaged in the IDP.

- 4.8 Is the Plan positively prepared in terms of meeting future infrastructure needs and has there been a robust assessment of needs in this regard?
- 4.9 Is the IDP suitably robust and does it demonstrate that necessary infrastructure will be delivered when needed to support the Plan?
- 4.10 What are the key infrastructure requirements for the successful delivery of housing planned and how have they been identified?
- 4.11 Where, when and how will the supporting infrastructure, facilities and services (e.g. additional school places, affordable housing and sustainable public transport) required as a result of the development proposed in the Plan be delivered? The IDP refers to Local Plan phases in its tables but where and how are these phases defined?
- 4.12 Is there robust evidence to demonstrate that all necessary infrastructure to support the level of growth proposed in the Plan can be delivered when and where required and in accordance with the schedule and timetable identified in the IDP?
- 4.13 What evidence is there to support the identification and costs of these infrastructure requirements and is it sufficient and robust?

- 4.14 Has funding been secured for all the costs of the likely infrastructure identified within the IDP necessary to support the planned level of growth? If not, why and what are the implications for the delivery of the Plan?
- 4.15 What is the Council's approach with regard to developer contributions and is the approach sufficiently clear and robust in the Plan? Is this approach supported by reasonable, realistic and effective policies within the Plan and other relevant strategies, including the IDP?
- 4.16 Overall, has the Plan been subject to a robust assessment of viability and does it comply with national policy and guidance?
- 4.17 The viability report concludes that in the context of the re-provision of industrial floorspace, development is unviable unless it is supplemented by residential and office uses. In light of this conclusion, how can policy BE2 present a justified and effective policy?
- 4.18 In what way does the viability evidence support the site allocations and places growth options proposed? The Council is requested to clearly explain this, having regard to the policies tested at appendix 1 of the viability report.
- 4.19 Do the 31 development typologies listed within the viability assessment (page 21) provide an accurate reflection of the development proposals likely to come forward in Brent? We raise this given the particular emphasis on the increase of capacity on existing designated industrial sites within the Plan and the fact that only 5 of the 31 typologies used include employment uses.
- 4.20 Have the costs of the full range of expected development requirements on new housing been appropriately taken into account, including costs arising through the policy requirements identified by the Plan?
- 4.21 Are the methodology and conclusions set out in the Council's viability evidence reasonable and justified? Are there any inconsistencies between the approaches to delivering affordable housing within the Plan and the London Plan and their respective evidence in relation to the type and tenure split? If so, are these significant and how have they been dealt with?
- 4.22 Is the housing growth proposed and set out in policy BH1 financially viable? Specifically, does the viability assessment adequately reflect the nature and circumstances of the housing requirements in terms of tenure mix, specialist housing, build to rent and affordable housing?
- 4.23 How have issues concerning viability been addressed in order to ensure that there is a reasonable prospect that the sites identified as site allocations will come forward for development during the plan period?

Matter 5 – Housing

Main Issues: Are the policies for housing growth justified, deliverable and consistent with national policy and the London Plan?

Is the level of housing required deliverable? Is the housing target and the proposed distribution of new housing justified?

Will the Plan provide an ongoing five-year supply of deliverable housing sites?

Is the overall target for affordable housing and the type of tenure justified?

Are all identified housing needs addressed effectively and justified within the Plan and its policies?

[Policies BH1, BH2, BH3, BH4, BH5, BH6, BH7, BH8, BH9, BH10, BH11, BH12 and BH13]

Questions

Housing requirement

- 5.1 The overall housing requirement target for the Borough identified in appendix 3 of the Plan (page 392) for the Plan period – 2019 to 2041 is 45,554 dwellings. This equates to an average annual delivery of 2,070 dwellings over the Plan period. Is this correct? For clarification, what is the housing requirement for the Plan period? How has this been identified? Is it reasonable and deliverable?
- 5.2 Paragraph 6.2.6 of the Plan refers to the Brent Strategic Housing Market Assessment 2018 (SHMA) (EB_H_01) which identifies a need for 48,000 dwellings in LB Brent between 2016-41 – 1,920 dwellings per year. Is this the starting point for identifying the Objectively Assessed Housing Need (OAHN) for the Borough for the Plan period? If so, why? Is this correct? How does this assessment relate to the housing requirement set out for the Borough in the draft London Plan for the period 2019-29?
- 5.3 Paragraphs 3.21 – 3.23 (section 3) and section 6.4 of the Plan set out the context, challenges and aims of its strategy in relation to economic growth over the Plan period. How does the housing requirement set out in the Plan cater for the homes needed to meet this level of economic growth?
- 5.4 What is the relationship between the level of economic growth anticipated in the Plan and the proposed housing requirement? What evidence is there to support this and is the approach taken reasonable, justified and effective?
- 5.5 Is the identified OAHN for the Borough reasonable, justified and deliverable and is it consistent with the London Plan? What is the evidence to support this?

Housing strategy

- 5.6 The Plan's housing development strategy is set out in policy BH1 and section 6.2. This provides principles to guide the location of development through the Plan period. Is this an appropriate, positively prepared, justified and effective development strategy?

- 5.7 Is the Plan's multi-centred spatial strategy (Growth Areas) selected for the distribution of housing growth justified compared to reasonable alternatives?
- 5.8 Does the Council consider that it has explored all reasonable alternatives to meet the London Plan housing delivery target for the Borough for the period 2018/19–2028/29, as set out in the Plan? If so, how?
- 5.9 Policy BH1 says that opportunities to provide additional homes in the Plan period will be focused principally within Growth Areas and policy BH2 states that site allocations, town centres, edge of town centres and intensification corridors will be priority locations where additional housing will be supported. However, the Plan strategy does not appear to quantify the spatial distribution of new housing across the Plan area. Therefore;
- What is the spatial distribution of new housing proposed through the Plan? Should it be clearer in this regard? Does the Key Diagram on page 29 of the Plan provide a sufficient and clear illustration of the broad distribution of new housing across the Plan area?
 - What level or proportion of new housing is directed towards the town centres and to other parts of the Plan area?
 - How has this spatial distribution been arrived at and what is the justification for it?
 - Is the spatial distribution of housing supported by the IIA and will it lead to the most sustainable pattern of housing growth?
 - Have any other constraints influenced the spatial distribution of housing in the Borough? If so, how and what are they?
 - Overall, is the spatial distribution of housing justified, effective and is the Plan consistent with national policy and the London Plan and sound in this regard?
- 5.10 A number of representors have put the case that policy BH2 is too onerous and places unreasonable pressure and inflexibility on developers who may not have an appropriate business model to deliver the required housing. In light of this, are policies BH2 (Priority Areas) and BH3 (Build to Rent) in the Plan sufficiently flexible in their purposes and are they justified and effective? Are these policies consistent with the London Plan and the National Planning Policy Framework (the Framework)? What evidence is there to support these policies?

Housing supply

Overall supply

- 5.11 Does the Plan do all it can to significantly boost the supply of housing, as set out in paragraph 59 of the Framework? If so, how?
- 5.12 In accordance with paragraph 67 of the Framework, has the Council produced a Strategic Housing Land Availability Assessment (SHLAA) specifically for LB Brent which identifies suitable sites within the Borough to deliver the level of housing proposed in the Plan? If not, why?
- 5.13 Has the Council followed the methodology set out by the PPG in this regard? If not, is the Council's approach consistent with national policy and guidance?

The housing trajectory

Paragraph 67 of the Framework says that planning policies should identify a sufficient supply of specific deliverable sites for years 1-5 of the Plan and then specific developable sites or broad areas for growth beyond that. Based on the Housing Trajectory, for years 1-5 of the Plan (2019-2024), the housing figure is 14,906 dwellings. From the evidence, there are inconsistencies relating to which sites are deliverable and when. For example, the Plan identifies that site BCSEA4 will deliver up to 700 units in total with 200 in years 1-5 of the Plan period. In the Housing Trajectory, the site is identified for up to 500 units with 450 delivered in years 1-5 of the Plan period. However, no planning permission has been granted to date. In addition, there is some inconsistency between the overall delivery figures provided in the Housing Trajectory (EB_H_06) and appendix 3 of the Plan. As such, the Council is requested to reproduce EB_H_06:

- At a scale printable at A4 size;*
- Provide totals for the delivery figures provided on a year by year basis;*
- Provide an explanation for the colour coding of certain sites;*
- Cross check references to confirm that these correlate with the site allocation references within the Plan;*
- Provide confirmation that the figures within the main table tally with the summary provided at the top of page 1. If not, a clear explanation as to the nature of any differences is requested.*

5.14 There appears to be a discrepancy in the housing figures provided in appendix 3 of the Plan (page 392) and those set out within the Housing Trajectory. A further difference is evident in the total housing figure provided by the Council in its letter to us (dated 5 May 2020) responding to our initial comments and queries. Therefore, could the Council explain why there are differences in these submitted figures and clarify which of the figures provided are to be regarded as correct in meeting the OAHN for the Plan?

5.15 The Housing Trajectory states that in the first 10 years of the Plan period (2019-29) 27,136 dwellings will be delivered. Does this figure include a buffer? If so, what is it and where is the justification for the amount applied? Where is the evidence to support this?

Five year supply

5.16 Having undertaken the above, does the Plan provide an ongoing five-year supply of deliverable housing sites for the Plan period?

5.17 Are all sites relied upon in the Plan for the supply of housing in years 1 to 5 of the Plan period clearly identified as available, suitable, developable and deliverable in accordance with paragraph 67 of the Framework?

5.18 Is there adequate flexibility within the Housing Trajectory and the site allocations for housing to accommodate unexpected delays in delivery whilst maintaining an adequate housing supply?

Small sites

- 5.19 What size threshold has been set in identifying sites for allocation – some sites within the Housing Trajectory appear to be very small (e.g. BSSA13: Learie Constantine Centre – 0.03ha; BSSA15: Harlesden Station Junction: 128 Acton Lane - 0.07ha and BSESA32: 45-55 Cricklewood Broadway – 0.08ha)? What evidence is there that this approach is realistic?
- 5.20 Are the assumptions and analysis regarding site suitability, availability, achievability and development capacity in the Council’s supporting evidence, including the West London Small Sites SHLAA 2017 (EB_H_07; EB_H_08 and EB_H_09), reasonable, realistic and justified? Is this assessment sufficiently detailed and rigorous? How has this assessment contributed to the site selection process for the Plan?
- 5.21 In terms of housing supply and delivery on small sites, the draft London Plan says that an annual target of 1,023 units are to be provided in the Borough for the period 2019-29. However, the London Plan Panel Report indicates a revision to that figure for Brent, reducing it to 433 per annum for that period. The Plan indicates (paragraph 6.2.39) it will deliver 370 units annually. As a result, the Council therefore proposes to deliver a deficit of dwellings on small sites of 653 per annum based on the draft London Plan target and a deficit of 63 dwellings per annum based on the figure identified in the London Plan Panel Report 2019. Is this correct?
- 5.22 If the above is correct, is the Council’s approach to the delivery of dwellings on small housing sites set out in policy BH4 adequate, appropriate, justified and effective? How does the Council intend to address the proposed shortfall in housing supply on small sites?
- 5.23 What evidence is there to support the Council’s approach to omitting criterion A2 of London Plan Policy H2A from its assessment of small site development (policy BH4) and its overall position regarding housing delivery on small sites?
- 5.24 How is the overall supply of housing sites to be effectively monitored and managed? Does the Plan contain a robust housing implementation strategy or other suitable monitoring framework?

Windfall

- 5.25 What evidence is there to support the Council’s approach to windfall housing sites? What is the justification for the variable approach, ranging from 140 to 469 units per year of windfall allowance across the plan period, as set out in the Housing Trajectory?
- 5.26 Does the approach to windfall accord with paragraph 70 of the Framework? Where is the evidence to indicate that such units will provide a reliable source of housing supply? Is the Council’s approach realistic and does it have regard to the SHLAA, historic windfall rates and expected future trends?

Other housing supply

- 5.27 The Housing Trajectory includes an allowance for the '*reoccupation of vacant units*' at 56 units per year for the first 5 years of the plan period. What does this mean? Where is the evidence to justify this and how has the figure been calculated?
- 5.28 The Annual Monitoring Report 2018-19 (AMR) (Core_Gen_013) advises that in 2018/19 there were 1731 net new dwellings completed against a target for the Borough of 1525. Furthermore, 119 reoccupied vacant dwellings were brought back into use. Therefore, a net total of 1850 is shown for the year. The AMR uses a 'units completed' figure. Please could the Council clarify and confirm how the units have been accounted for in terms of calculating housing supply (i.e. 'new dwellings completed' vs. 'dwellings brought back into use').
- 5.29 Is the approach taken towards Vacant Building Credit in the Plan consistent with that set out in Policy H9 of the London Plan and in national policy?
- 5.30 In the AMR (page 12) there is reference to the provision for self-build units. Are such matters provided for within the policy framework of the Plan? Does the Council have a specific policy relating to self-build homes? If not, why? Is the potential lack of such a policy within the Plan consistent with national policy?

Affordable housing

- 5.31 The Brent Strategic Housing Market Assessment (SHMA) Update (EB_H_01, paragraph 4.114, page 56) advises that the affordable housing need between 2016-2041 will be 22,100 dwellings (884 dwellings per year) How do these figures relate to the Plan period as a whole? What is the identified affordable housing need over the Plan period? Where is this set out within the Plan?
- 5.32 Is the overall approach to affordable housing in the Plan based on evidence that is robust and is the Plan sound in this regard? Are the definitions used for affordable housing within the Plan consistent with annex 2 of the Framework?
- 5.33 The AMR states for the year 2018/19 that 442 of the 1850 units completed, were affordable (24%). In light of this, and paragraph 6.2.44 of the Plan which acknowledges viability concerns in relation to the 50% target, where is the evidence to support the Plan's policy target of 50% of all new homes in the Borough being affordable units, as set out in policy BH5? Is this a positively prepared, realistic, justified and deliverable target?
- 5.34 Will the overall housing requirement proposed in the Plan ensure that the need for affordable housing will be met? If not, how will any shortfall in affordable housing be addressed?
- 5.35 Has the Council considered increasing the total housing figure in order to help deliver the required number of affordable homes in accordance with the PPG?
- 5.36 In relation to concerns raised by Transport for London Commercial Development, does the requirement within policy BH5 for 100% of 'Build to Rent' developments to be at the London Living Rent (LLR) level result in a significant

restriction in the range of genuinely affordable rents available in the Borough? Does the policy, as submitted, limit the affordable housing mix and balance in the Borough? Is policy BH5 in accordance with the London Plan in this regard?

- 5.37 Would amending policy BH5, for example by reducing the proportion of affordable 'Build to Rent' units at the LLR level to 30%, ensure that a greater range of genuinely affordable homes would be secured in Brent than the policy would achieve as submitted? If so, how? Where is the evidence to support this?
- 5.38 Is policy BH5 in the Plan sufficiently clear about when off-site provision of payment in lieu of affordable housing will be accepted? Will the approach to phasing of large sites be effective in this regard?

Housing mix and other housing matters

- 5.39 Is the housing mix sought by the Plan in terms of type and tenure justified? Will policy BH6 be effective in delivering the identified proportions of housing types and tenures?
- 5.40 Given the high preponderance of flatted development anticipated, particularly in town centres, how is the target for more family housing (i.e. 25% of all new housing to be 3 bedroom-plus dwellings) in policy BH6 to be achieved? Is this target reasonable, justified and effective? What evidence is there to support it? Does this approach accord with the London Plan?
- 5.41 Given that the Plan's policy target is for 25% of all new housing units to have at least 3 bedrooms, the supporting viability assessment work focused on 40% of new housing units having at least 3 bedrooms. What is the reasoning for this and how has the 25% target been arrived at?
- 5.42 Does the evidence within the ORS Reports, the submitted Plan and its policies adequately, reasonably and effectively address issues regarding accessible and adaptable housing? How does the Council anticipate dealing with such matters?
- 5.43 Does the Plan adequately address the needs for all types of housing (excluding affordable housing) and the needs of different groups in the community, as set out in paragraph 61 of the Framework? Is the overall approach within the Plan regarding this consistent with national policy and the London Plan?
- 5.44 In light of representations made by Unite Students regarding the provision of shared-facility and student accommodation:
- Is part D of policy BH7 sufficiently justified and effective in terms of defining or identifying a specific need in the Borough for shared-facility or additional support accommodation and purpose-built student accommodation?
 - Is policy BH7 consistent with national policy and the London Plan?
 - Does part E of policy BH7 provide sufficient definition in terms of where and how proposed shared-facility accommodation, including student accommodation, would result in an over-concentration of that type of development in the area?

- Would providing further detail within part E of the policy significantly restrict such types of development from coming forward? Would doing this make the policy more or less effective?
- 5.45 Policy BH8 relating to Specialist Older Persons Housing sets an annual target of 230 units for such accommodation in defined circumstances. The policy also identifies the proportion of such new development in Growth Areas and specifies that such development elsewhere should be on sites with a capacity of at least 500 dwellings. How have these targets been determined and where is the evidence to support this? Are they reasonable and justified?
- 5.46 With regard to Gypsy and Traveller accommodation, the draft London Plan proposes a definition for the purposes of assessing need for pitches and temporary stopping places that differs greatly from the national definition. The West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2018 (EB_H_04) reviewed these two assessed definitions. For the London Plan definition, need in LB Brent is identified as 90 pitches whilst for the national definition it is 0 pitches. As a result:
- Does policy BH9 as currently drafted address the needs for gypsy and traveller accommodation during the plan period? Is this approach consistent with national policy and guidance and the London Plan?
 - The approach identified by policy BH9 includes defining broad areas in which developers of individual sites would be obliged to consider the provision of such accommodation. How does this approach adequately, appropriately and effectively address meeting the need for Gypsy and Traveller accommodation within the Borough?
 - If the London Plan definition were to remain and the need for 90 pitches in the Borough is to be realised, how does the Council propose to address meeting this requirement and identify specific sites for such accommodation?
- 5.47 The Framework and the London Plan refer to policies to resist the loss of housing, the conversion of family sized dwellings and inappropriate development of residential gardens.
- Does the Plan and its respective policies, namely policies BH10, BH11 and BH12, adequately and appropriately address these matters?
 - Are the approaches to these matters, as set out in the Plan and relevant policies, reasonable, effective and justified and based on robust evidence? Are they consistent with national policy and guidance and the London Plan where required?
- 5.48 Is policy BH13 reasonable and effective in delivering sufficient external private amenity space in higher density developments such as flats? Where such space cannot be provided in full, is it reasonable and justified to expect that the remainder would be supplied in the form of communal amenity space? Where is the evidence to support this approach?

Matter 6 – Economy and town centres

Main Issues: Are the policies in relation to employment needs justified, deliverable and consistent with national policy?

Are the policies relating to retail development sufficiently positive, clear and consistent with national policy objectives?

[Policies BE1, BE2, BE3, BE4, BE5, BE9 and BHC4]

Questions

Economy

- 6.1 What is the employment need of the Borough over the Plan period? Is this clearly defined within the Plan?
- 6.2 Has sufficient land been identified to meet the short and long term employment needs of the Borough over the Plan period? Is the approach consistent with national policy and the London Plan?
- 6.3 Is the amount of employment provision and its proposed distribution consistent with the evidence base? Is the adopted approach sound and based on robust and up to date evidence?
- 6.4 Paragraph 6.4.9 of the Plan sets out a number of measures identified by the London Plan in order to achieve additional employment floorspace capacity. With reference to the measures identified, can the Council identify precisely which policies are securing these different measures?
- 6.5 In the context of policy BE1 (Economic growth and employment opportunities for all), how has the 10% threshold level been arrived at? Why is the floorspace threshold level 3000sqm? Where is the evidence base to support this figure?
- 6.6 Paragraph 6.4.12 sets out a number of requirements in relation to affordable workspace and appears to provide the justification for policy BE1. For example, the supporting text advises that this should be secured for the lifetime of the development and that a Section 106 agreement will be used to secure these measures. Is the policy sufficiently effective without these requirements within the policy wording? Should the policy wording reflect this? Is the policy sufficiently flexible?
- 6.7 Paragraph 6.4.13 also appears to introduce flexibility and additional criteria into the policy application. Again, should this wording be within the policy and not the supporting text?
- 6.8 In the context of policy BE2, where are Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) defined? Should this be covered by the policy wording?
- 6.9 Are all the existing employment sites accurately reflected on the policies map?
- 6.10 What effect would policy BE2 concerning the safeguarding of existing employment sites have on future losses of employment land? Is the wording of the policy sufficiently clear so as to be effective in its application?

- 6.11 Are local employment sites identified by policy BE3 shown on the policies map?
- 6.12 Part (b) of policy BE3 refers to 'makerspace' – does this require a definition within the glossary? Paragraph 6.4.24 of the Plan refers to Brent's requirements for affordable workspace as set out in paragraph 6.4.12. This is a supporting text paragraph only - should cross reference to the policy be made?
- 6.13 How can the requirement of paragraph 6.4.25 of the Plan be effective as it refers to the provision of financial contributions? Should this requirement be reflected within the policy wording?

Town centres

- 6.14 The 'Retail and Leisure Needs Study' (EB_E_06) draws specific conclusions regarding the convenience and comparisons goods floorspace requirements as well as class A3 and A4 leisure needs at 2028. These are set out at table 8. Is it clear from the Plan what the retail needs over the Plan period are? Does the policy framework accurately reflect the evidence base in this regard and if not, should it be made clearer?
- 6.15 Does the 'Places' section of the Plan accurately reflect the findings set out at table 8.1 and is it clear which site allocations will be contributing to delivering this identified need?
- 6.16 Figure 34 on page 321 of the Plan denotes the Major town/district and local centres. Is the figure sufficiently clear? What does the colour coding refer to?
- 6.17 Are the threshold levels identified by policy BE4 in relation to primary frontages and vacancy rates justified by the evidence base? Should the marketing requirements be clearly cross referenced within the policy akin to policy BHC5 and public houses (page 240)?
- 6.18 In relation to policy BE4, are the primary shopping areas brought about by this policy the same as those recommended by the 'Retail and Leisure Needs Study'?
- 6.19 Which policy brings about the designation of the secondary shopping areas?
- 6.20 How does the Plan reflect the specific recommendations of the retail evidence base in relation to Ealing Road District Centre?
- 6.21 In relation to policy BHC4 – Brent's Night time economy, is the final sentence of the policy sufficiently clear? How will this be assessed?
- 6.22 In relation to policy BHC5 – Public houses, paragraph 6.5.38 refers to an increase in conversion of public houses to other uses. Where is the evidence base to support this and the policy framework outlined by policy BHC5?
- 6.23 In relation to policy BE5 - how have the threshold levels identified by policy BE5 regarding betting shops, adult gaming centres and pawnbrokers been arrived at?
- 6.24 In relation to Shisha cafes, the evidence base appears to rely on (EB-E-14) which covers an audit produced between October 2011 and March 2012. The

report refers to a re-audit of students planned for October 2013. Did this re-audit take place? Is this evidence, which is some 9 years old, sufficiently robust and up to date? Particularly, can the chart relating to Shisha and proximity to schools be relied upon? (The relevant document has no page or figure numbers. However, the relevant chart appears just before graph 17).

- 6.25 In relation to policy BE5 and takeaways, the evidence appears to rely upon the document (EB-E_12) 'Takeaway use among school students, June 2014'. Is figure 2 on page 11 sufficiently up to date to represent the location of takeaways within the Borough? Where precisely is the evidence to support the remaining criteria in relation to takeaways set out at parts a, c, d and e of the policy?
- 6.26 Paragraph 6.4.43 refers to the need to prevent the over concentration of takeaways being supported at a national and regional policy as well as by a growing evidence base. Can the Council set out specifically what evidence they are referring to in this regard? Is this approach reasonable and justified?
- 6.27 With reference to policy BE9 - Visitor accommodation, is the justification of the policy in the right place? In the context of part (a) of the policy, how will 'significantly compromise' the supply of land for housing be assessed? Is this policy requirement in accordance with national policy?

Matter 7 – Design, Heritage and Culture

Main Issues: Does the Plan take a justified and suitably evidence-based approach to design, heritage and culture?

Is the Plan and its policies sufficiently positive, clear and consistent with both the London Plan and national policy in relation to these matters?

[Policies BD1, BD2, BD3, BHC1, BHC2, BHC3, BHC4 and BHC5]

Questions

Tall buildings

The Tall Buildings Strategy (EB_D_01) appears to be based around an assessment of identified growth areas (opportunity areas), areas with high public transport accessibility, the existence of existing tall buildings and proximity to conservation areas. The Strategy advises that its purpose is to support the provision of tall buildings in the most appropriate locations. However, there are a number of concerns in relation to this evidence base and how it has informed the policy framework:

- *The Strategy refers to long range/mid-range and immediate views – these are not clearly defined within the report;*
- *Page 13 - Average building heights, these appear to be very broad, with no detailed explanation as to how these have been arrived at;*
- *The draft London Plan (paragraph 3.9.2) clearly sets out a number of steps to be undertaken in relation to tall buildings. Can the Council explain precisely how these steps have been undertaken?*
- *Maps and keys are inconsistently applied throughout the document (see page 40, paragraph 8.10 incomplete sentence, page 45 map with no key),*

there appears to be a lack of urban design analysis or assessment of important townscape features and existing character or any explanation as to how existing building heights, block patterns and land uses have been taken into account;

- *In some cases, SPD policy has merely been repeated, (South Kilburn SPD 2016), with no up to date townscape analysis undertaken;*
- *It is unclear how the PTAL 2031 ratings have been arrived at and the relevance of this date;*
- *Protected views, such as the Wembley Arch and the Northwick Park strategic view to Harrow on the Hill are insufficiently identified within the evidence base. The Council is requested to provide these on an overlay map with the tall building zones identified;*

In light of the above, it is unclear how the design criteria identified at page 56 of the Strategy have been arrived at. In particular, there appears to be no justification for the core, pinnacle and edge approach adopted to the tall buildings zone.

- 7.1 Does the evidence base provide a sufficiently justified approach for policy BD2?
- 7.2 Is policy BD2, as drafted, positively prepared and consistent with national policy?
- 7.3 Does policy BD2 adequately and clearly define what constitutes a tall building in the Borough? Do the criteria contained within the policy provide sufficient detail and flexibility in terms of development heights both within and outside identified Tall Building Zones so as to be reasonable, justified and effective?
- 7.4 Is the approach to identifying appropriate locations for tall buildings within the Borough set out in policy BD2, and supported by the Tall Buildings Strategy, overly specific and restrictive? Is the Plan's approach to tall buildings clearly set out within the policy and supporting text?
- 7.5 Policy BD2 refers to building heights shown on the policies map – how are these identified?
- 7.6 The policies map refers to core, pinnacle and zone under 'Tall Building Zones' – what specifically do these different areas mean and how are these reflected in the policy wording?
- 7.7 The Tall Buildings Strategy emphasises the importance of a stepped down approach towards the edge of the allocated Tall Building Zone. However, this is not reflected in the policy. Should it be?
- 7.8 Are the criteria reflected at paragraph 6.1.22 of the Plan appropriate and should they be reflected in the policy wording?
- 7.9 As drafted, is policy BD3 - relating to basement development - reasonable, justified and effective in its purpose to control the size, use and environmental impacts of basement development in the Borough? Is it consistent with the London Plan and national policy? Does the Council's 'Basements Supplementary Planning Document' adequately and effectively support policy BD3 of the Plan?

- 7.10 Does policy BD3 provide sufficient clarity on what is, and what is not, a planning matter in relation to basement developments? Should the policy do this?
- 7.11 Should policy BD3 specify that basement proposals should be able (or be required) to demonstrate with evidence at application stage that the impact on buildings has been adequately and appropriately assessed? Would not including this in the policy make it unsound? If so, why?

Heritage and culture

- 7.12 Does policy BHC1 contain an adequate distinction between the policy provisions for conservation areas and other designated heritage assets compared to non-designated assets identified to be of special local character and heritage? If not, should it and if so, how should the policy be changed?
- 7.13 Does policy BHC2, as drafted, sufficiently and appropriately balance the need to protect important views of the National Stadium from the surrounding area against the need for development within the Wembley Growth Area? If not, how should the policy be changed?
- 7.14 Does policy BHC5 provide adequate protection for existing public houses which are of heritage, cultural, economic or social value?
- 7.15 Should policy BHC5 be expanded to support proposals for new public houses where this would be in accordance with draft London Plan policy HC7? Do other policies in the Plan (such as policies BE4, BE5 and BHC4) provide sufficient, appropriate support and flexibility in this regard?

Matter 8 – Social, green and sustainable infrastructure

Main Issues: Does the Plan adequately address social, green and sustainable infrastructure issues across the Borough?

Does the Plan take a justified and suitably evidence-based approach to social, green and sustainable infrastructure?

Is the Plan and its policies sufficiently positive, clear and consistent with national policy and the London Plan in relation to these matters and effective in implementation?

[Policies BSI1, BGI2, BSUI1, BSUI2, BSUI3 and BSUI4]

Questions

Social infrastructure

- 8.1 Has the Council produced a 'Social Infrastructure Needs Assessment', in accordance with policy S1 of the draft London Plan? If not, why and how has the Council assessed need in this regard?
- 8.2 Is the Plan's approach to protecting and maintaining existing and providing new social infrastructure and community facilities set out in policy BSI1 reasonable, sufficiently positive, justified and effective? Is the policy based on robust evidence and consistent with the London Plan, national policy and guidance?

- 8.3 Do the criteria set out in policy BSI1 provide a reasonable, adequate, justified and effective means to protect and maintain existing social infrastructure and community facilities and deliver new or enhanced infrastructure and facilities?

Green infrastructure

- 8.4 What evidence and assurance is there to support the Council's approach to protecting and enhancing the Borough's green (and blue) infrastructure, as set out in policies BGI1 and BGI2 within Section 6.6 of the Plan? Is the supporting evidence reasonable and justified? Is the Council's policy approach in this regard sufficiently positive, effective and consistent with national planning policy and guidance and the London Plan?
- 8.5 It has been suggested in representations to the Plan that Part G of policy BGI1 be strengthened to ensure that development does not impede achieving the future goals of the environmental improvement objectives of the Water Framework Directive and Thames River Basin Management Plan. Is this amendment to policy BGI1 necessary with regard to the soundness of the Plan and consistency of the policy with national policy, guidance and the London Plan? If so, why?
- 8.6 Policy BGI1 does not directly address the risks, management and eradication of Invasive, Non-Native Species (INNS) and their impact on people, places and the environment. As such:
- Would amending the policy, as the Environment Agency suggests, be reasonable, justified and effective?
 - Is amending the policy necessary to make the policy and the Plan sound and consistent with national policy and guidance?
 - How else could these matters be appropriately and adequately addressed?
- 8.7 Paragraph 6.6.30 of the Plan refers to the requirement for a minimum 8 metre 'set-back' of development from main river watercourses and states that if a larger 'set-back' exists then this should be retained. Should this requirement be made explicit within policy BGI1 rather than in the supporting text of the policy?

Sustainable infrastructure

- 8.8 Is policy BSUI1 reasonable, justified, effective and consistent with the London Plan, national policy and guidance in general and in relation to tackling climate change? Is the policy based on robust evidence?
- 8.9 Does policy BSUI1 provide sufficient clarity and flexibility with regard to the requirement for all major development to connect to or contribute towards a decentralised energy system?
- 8.10 Does policy BSUI1 provide sufficient flexibility in terms of meeting objectively assessed needs for development whilst also seeking development that contributes to and utilises sustainable and renewable energy sources?
- 8.11 Is policy BSUI2 reasonable, justified, effective and consistent with the London Plan, national policy and guidance with regard to air quality and its impacts? Is the policy based on robust evidence?

- 8.12 Does policy BSUI2 clearly and sufficiently address the identified issues in relation to the impact of major development on air quality? If so, how?
- 8.13 Does policy BSUI3 – ‘Managing Flood Risk’ provide sufficient clarity and detail as to which proposals will require a flood risk assessment (FRA) and when? Is the policy effective, appropriate, justified, consistent and compliant with national planning policy and guidance in relation to the sequential and exception testing of development sites?
- 8.14 Paragraphs 6.7.5–6.7.7 of the Plan appear contradictory, stating that no major flooding has occurred in the Borough in the last 20 years but then indicating that there have been several instances of sewer flooding over the last 5 years. Is this correct? If so, how does the Council intend to clarify and rectify this?
- 8.15 Does policy BSUI3 provide sufficient clarity in terms of the proposals which would be required to undertake a flood risk assessment? If not, why?
- 8.16 Paragraph 6.7.37 of the Plan outlines where a flood risk assessment would be required. Should this explanation be made more prominent and explicit within policy BSUI3?
- 8.17 In accordance with paragraph 157 of the Framework, should reference be made to the requirement for development sites to pass the sequential and exception tests relating to flood risk? Should policy BSUI3 be amended accordingly in order to comply with the Framework?
- 8.18 What is the ‘developed functional floodplain’ within the Borough and where is this defined and explained in the Plan? Should this be set out within policy BSUI3 to provide more clarity for users of the Plan?
- 8.19 Is policy BSUI4 reasonable, justified, effective and consistent with the London Plan, national policy and guidance in general and in relation to water management and surface water attenuation? Is the policy based on robust evidence?
- 8.20 Do the requirements and criteria set out in policy BSUI4 provide adequate and reasonable measures for all developments to undertake and contribute effectively to the mitigation of their impact regarding on-site water management and the control and reduction of surface water run off?

Matter 9 – Places (including Site Allocations)

Main Issue: Are the policies and site allocations outlined within the places section of the Plan justified, effective and consistent with national policy?

[Section 5 of the Plan]

General Questions

- 9.1 In relation to all of the proposed site allocations contained within ‘Section 5 – Places’ of the Plan:

- Are the criteria in the allocations policy necessary, relevant and deliverable?
- Is the approach taken to identifying site capacity appropriate and consistent across all site allocations? Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at? Is the capacity accurately reflected on the housing trajectory?
- Is the description of the site necessary to be included within the policy wording?
- Is the allocation justified by the evidence base?
- Is the extent of each site correctly identified?
- Are the detailed requirements for each site clear and justified?
- Is the allocated site deliverable?
- Do all of the site allocations accurately reflect the conclusions of the Tall Buildings Strategy in terms of building heights?
- Have all the site constraints, development mix and viability considerations been taken into account?

In order to provide a comprehensive response for each of the site allocations, it is requested that the Council respond to each of these bullet points above individually for each site allocation within the 'places' identified. All responses should be supported by reference to the evidence base as appropriate.

- 9.2 What is the purpose of the percentage of employment land, conservation areas, open space as shown within each of the places? Does this reflect the existing or proposed position?
- 9.3 Is the approach to the PTAL rating consistent across the sites? All of these appear to relate to 2031 – what is the relevance of this date? In some instances, the text reflects the current PTAL rating and in other cases not – what is the reasoning for this?
- 9.4 How have the indicative capacity figures for each of the site allocations been arrived at? In what way has the tall buildings study influenced the indicative capacity figures identified? Should these capacity figures be expressed as a minimum and are the site allocations sufficiently flexible in this regard?
- 9.5 In a number of instances, the 'planning considerations' section is extensive (for example BEGA2: Staples Corner Growth Area) and not precise. In accordance with the advice contained within the PPG, is the Council satisfied that this text provides clarity for developers, local communities and other interested parties about the nature and scale of development?
- 9.6 In a number of instances, the design principles are very specific. For example, BCSA7 Wembley Park Station (North and South) stipulates building heights across various parts of the site – how have these figures been arrived at? In other allocations, (for example BCSA8: Wembley Retail Park) the design principles merely cross reference a previous planning application. Is the approach to design principles consistent across the sites and justified by the evidence base?

Specific Place Questions

Place 5.1 Central

- 9.7 Figure 10 refers to 'other' site allocations - what are the status of these sites? Is the approach to 'other' site allocations consistent throughout the Plan?
In relation to sites BCSA13-19, there is no narrative, is this correct?
- 9.8 Figure 11 lists major sites with planning permission- what is the purpose of this list? If it is to illustrate existing commitments is it necessary to provide the full list or just a total figure?
- 9.9 Policy BCGA1 advises that there is scope for 15000 dwellings, is this across the Plan period as a whole?
- 9.10 Is policy BCGA1 and the terminology used sufficiently clear and consistent with the London Plan (Wembley Growth Area vs Wembley Opportunity Area) ?
- 9.11 Is site allocation BCSA7: Wembley Park Station sufficiently justified in relation to the town centre boundary, the land uses envisaged and Wembley Park Station?
- 9.12 Is the wording in relation to buildings heights overly prescriptive and is it supported by the evidence base?
- 9.13 Is site allocation BCSA10: York House sufficiently flexible in relation to the primary school provision?
- 9.14 Is site allocation BCSA2: Stadium Retail Park and Fountain Studios sufficiently flexible in relation to the level of retail provision to be provided on the site?
- 9.15 Site allocation BCSA4: Fifth Way/Euro Car Parts – Is the approach in relation to no net loss of employment floorspace justified and should the policy introduce greater flexibility?

Place 5.2 East

- 9.16 Where does it set out the overall number of dwellings this sub area will deliver during the Plan period?
- 9.17 Is the policy sufficiently flexible in terms of building heights envisaged? (page 85)?
- 9.18 Site allocation BEGA2: Staples Corner Growth Area – Is this policy sufficiently clear in terms of acceptable land uses which may be appropriate on the site?
- 9.19 Figure 14 – 'other' site allocations and figure 15 – major sites with planning permission – what is the purpose of providing these within the Places section of the Plan?

Place 5.3 North

- 9.20 Policy BNGA1 advises the Burnt Oak/Colindale Growth Area will deliver over 2000 homes to 2041. Should this be reflected in policy BP3?
- 9.21 Figure 17 and 18 – ‘other’ site allocations and major sites with planning permission for housing– what is the purpose of providing these within the Places section of the Plan?

Place 5.4 North West

- 9.22 Policy BP4 North West general policy advises the Northwick Park Growth Area will deliver approximately 2600 homes. Over what period will this take place?
- 9.23 Figure 21 – major sites with planning permission – what is the purpose of providing these within the Places section of the Plan?

Place 5.5 South

- 9.24 Policy BSGA1 advises the Church End Growth Area will deliver 1040 new dwellings to 2041. Should this be reflected in policy BP5 South?
- 9.25 Does the opportunities section on page 152 provide sufficient support towards improving the townscape in the Stonebridge Park gateway?
- 9.26 Site allocation BSSA1 – does the description accurately reflect the existing uses which take place on the site? Is the policy wording sufficiently flexible in terms of potential phased redevelopment of the site?
- 9.27 Site allocation BSSA4 - where precisely is the evidence concerning a lack of community infrastructure in this location?
- 9.28 Site allocation BSSA6 - does the description accurately reflect the existing uses on the site?
- 9.29 Figure 24 – ‘other’ site allocations is an extensive list (BSSA8-BSSA19). What is the purpose of this list?

Place 5.6 South East

- 9.30 Policy BP6 South East advises that the South Kilburn Growth Area will deliver approximately 3400 homes with a target of 50% affordable housing by the end of the plan period. Precisely which site allocations will deliver this quantum of housing?
- 9.31 Site allocation BSESA18 – is the capacity indicated justified by the evidence base?
- 9.32 Figure 27 – ‘other’ site allocations and figure 28 – major sites with planning permission for housing provide an extensive list of sites. What is the purpose of this list? What is the purpose of providing these figures within the Places section of the Plan?

Place 5.7 South West

- 9.33 There is no housing delivery figure provided within policy BP7 South West. However, policy BSWGA1 advises the Alperton Growth Area will deliver over 6000 additional homes. Over what period is this? What is the overall contribution which the South West Place will make and how do the remaining site allocations within this section fit with the overall housing numbers?
- 9.34 Is the policy wording at policy BP7 in relation to character, heritage and design and community and cultural facilities justified by the evidence base?
- 9.35 Site allocation BSQSA7: Northfields - does the policy text accurately reflect the existing uses and planning history of the site?

Matter 10 – Delivery and monitoring

Main Issue: Does the Plan set out a clear framework for the monitoring the implementation of the policies within the Plan?

How will the effectiveness of the Plan and its policies be measured and assessed?

[Section 7 of the Plan]

Questions

- 10.1 How will the effectiveness of the Plan's policies, the identified quantum of development, the associated infrastructure requirements of the Plan's strategy and its delivery be monitored, managed and delivered?
- 10.2 A number of performance measures set out in figure 39 of the Plan indicate 'none' or 'no target' (e.g. the net number of dwellings lost where the development results in an overall loss of dwellings). Are these performance measures sufficiently precise so as to be effective?