

London Borough of Brent

Examination of the Brent Local Plan

Matters, Issues and Questions for the Examination

Response of the Council: Matter 4 – Strategic transport, infrastructure and delivery

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?*
- 4.1.1 The London Plan and the Mayor of London's Transport Strategy (MTS) provide the broad framework for the Council's approach to transport matters in the Local Plan. Similarly, the plan is consistent with a range of national guidance, other Mayoral strategies and borough plans, including the NPPF; the London Housing and Environment strategies; the Brent Borough Plan and the Brent Third Local Implementation Plan (LIP3). The main plans and strategies that set the context for the transport elements of the Local Plan are summarised in Table 4.1, below.

Table 4.1: Local Plan transport approach – wider policy influences

Plan/Strategy	Key Issues/Opportunities	LP Approach
National Guidance		
The National Planning Policy Framework (NPPF) (Feb 2019)	The NPPF highlights the importance of sustainable modes of transport in the planning process. In particular, it advocates for the highest priority to be given in new developments to the sustainable modes of transport, such as pedestrians and cyclists, followed by access to high quality public transport. When considering provision for cars in new developments the NPPF states that maximum	The LP is entirely consistent with the NPPF in its approach to transport matters. In particular, it seeks to: <ul style="list-style-type: none"> • improve and increase safe walking and cycling routes to encourage their use within and to Brent (Policy BT1); • encourage new developments that will have good access to public transport and support the development of new public transport infrastructure (Policy BT1); • improve and encourage the use of the canal system for

Plan/Strategy	Key Issues/Opportunities	LP Approach
	parking standards should not be applied as a matter of course and also calls for the provision of electric and other ultra-low emission vehicles.	freight and transport to and from the Park Royal area (Policy BT3); <ul style="list-style-type: none"> • encourage housing and commercial growth without increasing the reliance on private cars for journeys which originate within the borough (Policy BT2); • ensure that all new developments incorporate sufficient features and associated infrastructure to help reduce the potential for and the need to adapt to climate change (e.g. EV charge points) (Policy BT1).
Mayoral Plans/Policies		
Intend to Publish London Plan (Dec 2019)	The ItP London Plan places a strong emphasis on sustainable infrastructure, efficiency and resilience and seeks to capitalise on 'good growth' opportunities to become a smart and sustainable city, requiring developments to contribute towards becoming a zero-carbon city by 2050. A key policy in the Plan is the healthy streets approach which is designed to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business.	The LP advocates close partnership working with developers to ensure the delivery of patterns of land use that facilitate residents making shorter, regular trips by walking or cycling (Policy BT1). Key priorities include the need for development proposals to deliver improvements that support the Healthy Streets Indicators; reduce the dominance of vehicles on the borough's streets; and provide a high quality, attractive public realm which designs physical activity back into people's everyday lives.

Plan/Strategy	Key Issues/Opportunities	LP Approach
Transport Strategy (March 2018)	The Mayor's Vision is to create a future London that is home to more people and a better place for people to live in. A key aim of the MTS is for 80% of all journeys to be made on foot, by cycle or by public transport by 2041. A central tenet of the strategy is the 'Healthy Streets' Approach – with the view to making health and personal experience the priority for London.	The Council's overarching approach to transport in the LP is to encourage new development that will reduce reliance on private cars (Policy BT2); have good access to and support the development of new public transport links and services (e.g. WLO); and to increase the provision of safe and secure infrastructure to encourage greater levels of cycling and walking, especially for shorter journeys (Policy BT1).
London Housing Strategy (May 2018)	Building the right number and the right mix of new homes, and addressing the consequences of the housing crisis, are part of the Mayor's vision for good growth as set out in the London Housing Strategy. Among the key priorities include the need to build more homes for Londoners – to be achieved, in part, through investment in new transport infrastructure and services; and developing high-quality homes and inclusive neighbourhoods – for which securing improvements to the public realm and green infrastructure within which housing is set is critical.	The LP outlines the need for the Council to work closely with partners, including TfL and developers to secure a range of new transport infrastructure to support the development of over 40,000 new homes in Brent. Over the course of the LP schemes such as new rail, bus and transit links will be critical to support the borough's ambitious growth and homes targets. In addition, to ensure high-quality and inclusive neighbourhoods are achieved, the LP also advocates the need for improvements to cycling and walking infrastructure (Policy BT1).
London Environment Strategy (May 2018)	The London Environment Strategy highlights the need for significant improvements to the Capital's environment to ensure that London's growth is good growth and to transform Londoners' health and wellbeing. Central to the strategy is the need to make the city greener, cleaner and more resilient – all with the aim of	The LP approach to making transport in Brent greener and cleaner is to make the borough's developments and public spaces accessible to pedestrians and cyclists, rather than just for cars and other motorised vehicles to move through; to ensure that all new developments incorporate sufficient features and associated infrastructure to

Plan/Strategy	Key Issues/Opportunities	LP Approach
	making London a zero-carbon city by 2050. Key priorities include the need to dramatically improve air quality, reduce noise and waste.	help reduce the potential for and the need to adapt to climate change (e.g. EV charge points) (Policy BT1); and to improve and encourage the use of the canal system for freight and transport – particularly to and from the Park Royal area (Policy BT3).
Borough Plans/Policies		
Borough Plan – Building a Better Brent: 2019-2023 (Feb 2019)	The Borough Plan sets out the long-term vision for Brent and how it will build on the borough’s position as a focus for growth and ensure this change benefits its resident. Among the issues identified in the Plan is the need for a more joined-up, sustainable transport network if the borough’s growth, environmental and health and well-being ambitions are to be met.	The transport policies contained within the LP are closely aligned to the Borough Plan in that they work to secure investment in new transport infrastructure and services, in particular, new rail, bus and transit routes; seek to promote healthy, sustainable travel; and create safer, more welcoming streets and places for people, including pedestrians and cyclists (Policy BT1).
The Brent third Local Implementation Plan (LIP3) (May 2019); Brent Long-term Transport Strategy 2015-2035 (LTTS) (Dec 2015)	LIP3 and the LTTS both outline the Council’s strategy for improvements to the transport network and services in the borough, including the implementation of measures and interventions which will help connect people and places; promote healthy, sustainable travel; improve safety and security; and create better streets and places – key plan objectives.	The LP is helping to contribute to these objectives by highlighting the need for investment in the strategic transport network - including the need for high quality strategic transport connections into, out of and through the borough. In addition, the ambition in both plans for a more joined-up and sustainable local transport network that maximises opportunities for walking, cycling and using public transport (Policy BT1) and securing modal shift away from private cars sits at the heart of the LP (Policy BT2).

4.2 *Are the transport-related policies in the Plan based on reasonable, robust, and up to date evidence?*

- 4.2.1 The transport-related policies in the Local Plan have been formulated taking into account a wide range of current and future transport challenges and opportunities, including those relating to issues around congestion; public health; air quality and climate change. These are set out in detail in the Brent Third Local Implementation Plan (LIP3) and are summarised in Table 4.2, below:

Table 4.2: Key borough transport challenges and opportunities

Priority Issues/ Concerns	Key Challenges	Key Opportunities
Congestion	<ul style="list-style-type: none"> • High car dependency - with car used for more journeys than any other mode even though half of all journeys in Brent are less than 5 kms (2011 Census; ONS). • Forecast growth will result in increasing pressure on the road network, impacting on the movement of people and goods, without a shift to more sustainable modes of travel (e.g. public transport, cycling and walking). 	<ul style="list-style-type: none"> • Considerable potential for sustainable travel modes to assume a greater role than at present with 240,000 vehicle trips that originate in Brent that could be cycled and 40,000 trips that could be easily walked (Analysis of Cycling and Walking Potential; TfL 2016) • Adoption of maximum parking standards and car-free development will help encourage higher levels of walking, cycling and passenger transport use.
Public Health	<ul style="list-style-type: none"> • Obesity is a considerable concern for public health in Brent - around 55% of Brent's adult population are overweight, with 34% classified as obese. • By 2050 levels of obesity are projected to reach 50% of the adult population in Brent (Health and Wellbeing in Brent – Joint Needs Assessment; Brent 2017). 	<ul style="list-style-type: none"> • Implementing safe, convenient, efficient and attractive infrastructure conducive to cycling and walking will help facilitate greater levels of active travel and help address issues around poor physical health as well as helping to improve peoples' mental wellbeing
Air Quality	<ul style="list-style-type: none"> • Road traffic is one of the biggest contributors to poor air quality in London and air quality adjacent to some sections of the road network in Brent is very poor, with the Council having identified a number of Air Quality Focus Areas across the borough (Brent 	<ul style="list-style-type: none"> • Efforts to encourage modal shift towards walking and cycling and providing infrastructure to support low or zero emission vehicles provide a useful framework for reducing air pollution and for improving air quality in Brent.

Priority Issues/ Concerns	Key Challenges	Key Opportunities
	Air Quality Action Plan, 2017).	
Climate Change	<ul style="list-style-type: none"> Climate change threatens to damage our natural and built environment. In particular, predicted rises in temperature potentially will create overheating of buildings and places. 	<ul style="list-style-type: none"> A recent study, produced as part of the development of the Council's Climate Emergency Action Plan, highlights the significant benefits that can be achieved by decreasing car use in the borough whilst encouraging travel by more sustainable modes and increasing the take-up of low or zero emission vehicles.
Accessibility	<ul style="list-style-type: none"> Many residents in Brent experience difficulty accessing every day services and amenities. This reflects, in part, the more restricted transport choices of those on lower incomes; the lower density of development in some parts of the borough; and a continuing loss of local amenities which can be reached on foot, by cycle or by public transport. This undermines local centres, local neighbourhoods and communities. 	<ul style="list-style-type: none"> Future development in Brent is principally focused on the borough's Growth Areas, with the Council seeking to increase the amount and density of development around a number of key local centres and public transport hubs. Developments in these areas will provide significant opportunities to secure CIL/S106 funding to further enhance public transport infrastructure and services and cycling and walking facilities.
Connectivity	<ul style="list-style-type: none"> The borough's polycentric population distribution and socio-economic characteristics result in a network almost exclusively focussed around radial routes to and from Central London. There is, however, limited provision of east-west routes to provide direct connectivity between the radial lines across the borough. 	<ul style="list-style-type: none"> The development of the proposed West London Orbital rail link would drastically improve east-west public transport connectivity within the borough and across West London, whilst also helping to reduce car dependency and support growth.

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?

- 4.3.1 The main evidence base used to support the proposed level of development in Brent over the plan period is the London Plan: Strategic Modelling Supporting Evidence Report produced by TfL in December 2017.
- 4.3.2 The report sets out the strategic modelling that has been carried out to assess the effectiveness of the Mayor's Transport Strategy in accommodating new London Plan growth projections, with an increase in sustainable, active and efficient travel. The report concludes that if the MTS is delivered, the revised London Plan population and economic growth can be achieved with sustainable transport outcomes. The London Plan and MTS make a sustainable, active and efficient mode share of 80 per cent achievable.
- 4.3.3 For the most part the Local Plan 'broadly conforms' to the London Plan. In particular, the level of housing proposed aligns with the targets set out in the London Plan. As such, and with the mitigation measures/policies proposed (i.e. sustainable travel, public transport infrastructure, car free development etc.) there is unlikely to be a significant impact on the strategic transport network.
- 4.3.4 With regards the impact of development on the Strategic Road Network, including those roads managed by Highways England, this is largely addressed in the TfL Matter Statement for the London Plan EiP¹. The key points are highlighted below:

Impact of new development -

- Strategic modelling carried out by TfL demonstrates that the levels of growth outlined in the draft Plan can be accommodated with sustainable transport outcomes within the limits of the existing highways network, providing the policies and proposals of the Mayor's Transport Strategy (MTS) are implemented.
- Modelling of the MTS proposals suggest that the population and employment growth set out in the draft Plan can be achieved while reducing vehicle kilometres in the morning peak by 14 per cent, car trips by 3 million per day and car ownership by 250,000 compared to today's levels, resulting in overall traffic congestion levels across London that are broadly comparable to today during peak periods.
- In outer London, traffic volumes and congestion would also be lower with the MTS proposals in place, helping to alleviate the impacts of proposed growth on surrounding strategic roads.

¹ https://www.london.gov.uk/sites/default/files/mayor_of_london_-_m79_motorways_and_strategic_trunk_roads.pdf
[The TfL Matters Statement](#)

Development in outer London and Opportunity Areas -

- The vast majority of roads operated by Highways England are outside of London. Londoners' trips tend to be made within London (less than five per cent of the trips made by London residents cross the Greater London boundary), so any impact of increased housing delivery in outer London boroughs on Highways England's network should be limited, particularly with the implementation of other Policies in the Plan that limit parking and promote the use of sustainable transport modes
- Most large-scale development opportunities in outer London are clustered within the defined Opportunity Areas and around town centres. The growth corridors within which Opportunity Areas are clustered have been defined based on existing or planned public transport corridors, rather than strategic highways. This will help to deliver sustainable transport outcomes by enabling the majority of trips in these areas to be made on foot, by cycle or using public transport, minimising the impact on the road network.
- Draft Plan Policies seek to concentrate major trip generating development in town centres and around public transport nodes, helping to promote sustainable transport outcomes. This will mean that development is focused away from out of centre locations that are close to major road intersections, therefore reducing the potential impacts they could have on the strategic road network.

Parking and freight -

- More restrictive parking standards in draft Plan applied to reflect the higher level of growth set out in the draft Plan and to limit and manage impacts on borough, TfL and Highways England roads. In outer London, the maximum residential parking standards allow for less than one space per unit at locations with a Public Transport Access Level (PTAL) of 3 or higher and in Opportunity Areas.
- Details the various policies that aim to minimise the impact on the road network of freight movements associated with new development, including those that support the reduction, re-timing and mode switching of freight trips.

4.3.5 It is worth noting that the Panel found TfL's modelling approach to be sound. They were satisfied that impacts on the Strategic Road Network were adequately assessed and mitigated. The Local Plan is broadly consistent with the London Plan, with policies supporting development in well-connected locations, requiring robust assessments of transport impacts and also measures to mitigate any adverse transport impacts, and complemented by policies that support and enable walking, cycling and the use of public transport, and discourage unnecessary car use. As such, the Council is confident that there is unlikely to be a significant impact on the strategic transport network resulting from the level of development planned over the plan period.

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?*

4.4.1 Please see answer to 4.3, above.

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?*

4.5.1 The Local Plan acknowledges that there is poor public transport and cycling connectivity between certain parts of the borough and to other parts of West London. The lack of east-west and orbital connections is a particular problem. It often requires journeys to be made using more than one mode of transport.

4.5.2 The Plan recognises the importance of schemes such as West London Orbital in improving public transport links across Brent and providing connections to key hubs such as Brent Cross, Park Royal and Ealing Town Centre. Such schemes are also important in helping to unlock development potential in the borough. Areas such as Neasden are likely to be able to accommodate significant additional housing numbers (Neasden Station Growth Areas Policy BEGA1). Similarly, developments in other parts of the borough, in particular the other Growth Areas, will provide significant opportunities to secure CIL/S106 funding to further enhance public transport infrastructure and services and cycling links across the borough. Key priorities, as outlined in the Brent Third Local Implementation Plan, include:

- The further development of the local and sub-regional bus network, with priority given to those locations where PTALs are low; and improved orbital connectivity across the wider network;
- Improvements to the rail network in terms of frequencies, reliability and destinations served;
- The comprehensive redevelopment of Willesden Junction station so that plans for HS2, Network Rail, Crossrail 2 and Great Western Mainline Stations, as well as surface transport (buses and taxis), are properly integrated;
- Provision of new and improved pedestrian and cycle routes to complement and improve access to the public transport network in the borough.

4.5.3 The strategic outline business case for the West London Orbital (WLO) was published by TfL in June 2019. It found a strong case to progress the WLO. The report concludes that it might be used for 11.5 million passenger journeys each year. It is estimated to cost £281 million and would be value for money.

4.5.4 In the case of Staples Corner, the Brent Cross West Thameslink station will also improve connectivity, giving a route to Kings Cross in under 15 minutes. This is a committed project, already on-site.

4.6 *Is the overall approach to transport and the related policies in the Plan accepted and supported by Transport for London?*

4.6.1 Yes, TfL broadly accepts and supports the overall approach to transport and the related policies in the Plan. The following specific representations were made as part of the Reg.19 Full Consultation:

Organisation	Plan Section	Comments
TfL Commercial Development	Policies BT1–BT4	Strongly support the principles advocated in Policy BT1 and prioritising sustainable / active travel over private motor vehicles. TfL CD supports the aim of achieving a modal shift with 80% of trips across London being made by public transport by 2041, as advocated in the Mayor's Transport Strategy, and welcomes Brent's alignment with draft London Plan policy regarding residential parking provision. Also support the criteria for determining the suitability of development with regard to the impact of proposed parking outlined in BT2.
TfL Spatial Planning	Policy BT2 – Appendix 4	Supportive of broad approach to parking and car free development where in line with London Plan parking policies. Some concerns about the other employment uses approach, which allows higher parking provision. As with the draft London Plan every opportunity to reduce the proportion of these trips made by car – both through a development's location and design and through parking restraint – should be taken.

4.6.2 In relation to the further discussions that have been on-going in seeking to address the concerns of Highways England, the Council is aware that TfL have submitted a response to this question expressing support of the plan. It is TfL's view that the growth and schemes set out in the Local Plan are appropriate and should not lead to significant adverse impacts on the strategic road network.

4.6.3 A further statement from TfL reinforcing this position is set out in Appendix A.

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?*

- 4.7.1 Policy BT2, as currently worded, seeks to encourage, rather than require car free development in those areas where a Controlled Parking Zone (CPZ) is already in place or can be achieved. CPZs may not be warranted, or supported, in some parts of the borough. Similarly, in those areas with existing CPZs, car-free development may not be achievable or desirable. However, the absence of a CPZ does not or should not preclude car free development in suitable areas (e.g. those areas well served by public transport).
- 4.7.2 The Council is currently undertaking a review of its parking strategy, with a view to introducing CPZs borough-wide. If approved this would necessitate an amendment to Policy BT2 in any review of the Local Plan reflective of the extent of CPZ coverage achieved.

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?*
- 4.8.1 Yes, the Plan is positively prepared and will sustainably deliver the required infrastructure needs over the plan period. The positive approach taken to planning infrastructure in Brent has been shaped by early, proportionate and effective engagement with infrastructure providers and operators. This aligns with the requirements set out in paragraphs 16 (c) and 92 of the NPPF.
- 4.8.2 In order to determine what infrastructure is needed, the Council looked at population estimates for the plan period. Some of this growth will be from natural population growth (e.g. associated with increased birth-rate and higher occupancy of housing) and some from the construction of new homes. The draft Local Plan seeks to meet the housing needs of Brent by planning for the current draft London Plan target of 23,250 dwellings. This is a ten year target (2019/20 – 2028/29). Growth from housing will be the primary driver of demand for supporting infrastructure.
- 4.8.3 This method has been replicated over a number of individual evidence base documents. Each focuses on a specific infrastructure type, which come together to inform the IDP. These documents take a broad view of need, taking into consideration the provision of neighbouring London Boroughs, and how this will impact the needs of Brent. In doing this, the IDP shows how it meets the identified needs of the borough, over a broad range of essential

infrastructures, whilst acknowledging that Brent is not an island and needs to work together with neighbouring authorities.

- 4.8.4 Where shared interests and the potential for joint working has been identified, agreements between boroughs have been included within the Statement of Common Ground (EB_SOCG_01) on relevant strategic matters, such as schools and open space. This is supported by the NPPG, which states the importance of effective communication in determining strategic cross boundary infrastructure needs (paragraph: 016 reference ID: 61-016-20190315). To better facilitate the delivery of strategic infrastructure, the Council, in collaboration with the West London Alliance (WLA), have commissioned the West London Strategic Infrastructure Delivery Plan.
- 4.8.5 In every infrastructure category, the Council has been sure to engage constructively with all relevant stakeholders to ensure that the approach taken is up to date and in line with the Council's wider strategy going forward. This accords with the NPPG (Paragraph: 046 Reference ID: 61-046-20190315) which requires Local Authorities to communicate effectively to plan positively for its strategic cross-boundary infrastructure needs. Communication with strategic partners will be ongoing, and will continue to shape the infrastructure needs of the Borough. This will be reflected within the IDP, which is a live document and will be updated on an annual basis in consultation with relevant stakeholders.
- 4.9 *Is the IDP suitably robust and does it demonstrate that necessary infrastructure will be delivered when needed to support the Plan?*
- 4.9.1 Brent takes the delivery of infrastructure very seriously, and as such, has made its effective delivery a corporate priority. To ensure this priority is upheld, the Council will take a positive partnership approach with infrastructure providers and operators as stated in the answer to question 4.8. This will ensure that the necessary services and facilities are provided at the right time and in the right place to support the holistic delivery of sustainable communities. The IDP will be instrumental in the realisation of this corporate policy.
- 4.9.2 The IDP brings together the objectively assessed needs as outlined in the response to question 4.8. This assessed all infrastructure types as appropriate however, only healthcare, education and transport are seen as critical to support the identified growth within the borough. The Council has engaged constructively with all relevant stakeholders to ensure the Plan has been positively prepared in this respect. This is outlined more thoroughly in response to question 4.10.
- 4.9.3 The Council is currently in the process of committing to governance procedures to standardise and support infrastructure delivery within Brent through the IDP. This has been agreed at a senior level, and will be presented to Cabinet for approval this September (2020). This will serve to streamline the process around the spending of Strategic CIL on infrastructure priorities whilst ensuring transparency of governance. To further support this, the IDP will be updated on an annual basis to include the prioritisation of projects (i.e.

critical, essential, and desirable). This will coordinate the allocation of funds across service providers, ensuring everyone is aligned and projects are planned for effectively, being delivered when needed to align with the growth outlined in the Local Plan.

4.10 What are the key infrastructure requirements for the successful delivery of housing planned and how have they been identified?

- 4.10.1 The Plan has been positively prepared, supported by the IDP produced in consultation with all relevant stakeholders, and on an on-going basis as identified in response to question 4.8. The IDP identifies infrastructures where they are needed, and looks to see them delivered in accordance with the Plan. Infrastructure projects, and the Site Allocations within which they will be delivered, have been listed in Table 1 in Appendix B.
- 4.10.2 Brent is a highly urbanised Local Authority, includes no Green Belt, and does not generally propose development on any other green space (except in exceptional, plan-led circumstances). The sites identified for development are almost all brownfield sites. The strategic policies in the Plan provide a positive framework for further development on other brownfield land, but seek to protect designated green space from development. Therefore, as sites have already been developed they benefit from existing infrastructure such as connections to utilities and transport access. Overall, whilst these may require local upgrades, in terms of essential infrastructures generally, no significant infrastructure barriers to delivery have been identified by consultees, such as the utilities providers or TfL. There will be a need for supporting infrastructure, such as health centres and schools, which will ensure sustainable development to be delivered. This however is not considered likely to hold back site delivery of development.
- 4.10.3 The one identified exception is Northwick Park Growth Area (BNWGA1). This site is coming forward under the One Public Estate programme. There is a need for road improvements if the site is to achieve its full potential. These improvements have already been awarded grant funding through the Housing Infrastructure Fund (HIF) scheme. This will enable earlier delivery of the site, more of the site to be developed at higher densities, whilst enhancing the existing on-site infrastructure (namely Northwick Park Hospital). This will allow the site to achieve the housing figures identified by the Council in the Housing Trajectory (EB_H_06).
- 4.10.4 Another piece of infrastructure set to unlock housing growth in Brent is the proposed West London Orbital (WLO) railway line. This will utilise an existing freight line. It will meet a need for better orbital public transport across West London. The existing line is underutilised. The proposed scheme scores highly in terms of cost benefit analysis and has TfL support. The delivery of the WLO will enable identified sites to come forward at higher densities. However, its delivery is not considered essential for the proposed sites to come forward for new housing development.
- 4.10.5 In order to deliver sustainable, mixed-use communities, the IDP also identifies the projected need for healthcare and education infrastructure. The projects

required to meet this need are coming forward through the IDP. These have been listed in Table 1 in Appendix B. These primarily meet the projected needs over the short term (Phase 1, 2020-2025), as is practicable.

- 4.10.6 The healthcare needs have been identified in consultation with Brent Clinical Commissioning Group (CCG) and the Brent Healthy Urban Development Unit (HUDU). To meet the needs of projected growth over this period, the IDP includes the delivery of 4 new facilities (South Kilburn, Northwick Park, Northfields, and Wembley Stadium), and the expansion/improvement of the Willesden Centre for Health and Care.
- 4.10.7 The need for new education facilities has been identified in consultation with the Council's relevant service providers, and in accordance with the Brent School Place Planning Strategy (2019-2023). This was updated in late 2019 to reflect the new Borough Preferred Options (BPO) projections produced by the GLA. To meet the identified need for primary schools over Phase 1, the IDP includes the delivery of two new primary schools (Wembley Park, and South Kilburn), and the expansion of a third (Kilburn). To meet the equivalent need for secondary schools, the IDP includes delivery of one new secondary school (Neasden).
- 4.10.8 This exemplifies how the Plan has been produced positively, and effectively meets the essential infrastructure needs identified over the Plan period. It also demonstrates how other critical infrastructure, such as healthcare and schools, have been planned for over Phase one of the Plan, as is practicable. To continue this effective infrastructure planning, the IDP will be updated on an annual basis to ensure the needs of phases 2 and 3 can be met also.
- 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?*
- 4.11.1 The IDP includes a schedule of delivery for each infrastructure type. This includes where the infrastructure will be needed, when it is needed to be delivered, and how it will be funded. The locations have been informed by the objectively assessed need identified within the supporting evidence base documents.
- 4.11.2 The timeframe for delivery is stated within broad phases to provide flexibility on when this will come forward. These 'phases' each represent a 5 year period over which the Plan will be in place. Phase one represents the first 5 years since adoption (2020-2025), phase 2 the next 5 years (2026-2030), and stage three the following 5 years (2031-2035). This is considered planning best practice however, it is accepted that the definition of these phases should be made clearer within the IDP. The phases have been informed by the Housing Trajectory, which identifies the rate of housing delivery within the borough and where this is set to take place. The Housing Trajectory, in projecting growth by area, therefore determines infrastructure needs over the plan period.

- 4.11.3 The breakdown of delivery of these infrastructures, including where (site allocation), when (Local Plan 'Phase') and how (funding/ governance) they will be delivered, has been included within Table 1 in Appendix B.
- 4.11.4 The projects will be funded through a range of identified means, notably through the developer contributions of S106 and CIL, and other funds as appropriate. Their delivery will be coordinated through rigorous engagement with relevant stakeholders to ensure buy-in at every stage, which will further unlock potential funding streams.
- 4.11.5 Brent is a highly urbanised Local Authority, with limited land at its disposal for development to meet the plethora of identified needs. This makes it difficult to identify sites for all of the requirements identified within the IDP. The strategic policies throughout the Plan will assist in this delivery. For instance, policy BSI1 states that new social infrastructure should be co-located, maximising community benefit. This will assist the Council in meeting numerous infrastructure requirements at once through the development of one land parcel. In addition, policy BGI1 requires developments to provide new public open space. The IDP will assist the Council in identifying where these new infrastructures should be situated by providing robust justification for their delivery.
- 4.11.6 Much of the growth within the borough will take place within the identified Growth Areas. A number of these Growth Areas, including Northwick Park (BNWGA1), Staples Corner (BEGA2), Neasden Stations (BEGA1) and Church End (BSGA1) are subject to a masterplan approach. This process will identify the infrastructure needs generated within these areas, and make their delivery more specific, in line with the requirements set out within the IDP.
- 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?*
- 4.12.1 As identified in response to question 4.10, Brent is highly urbanised and does not have critical infrastructure barriers to the delivery of new homes. To meet growth sustainably, a number of key infrastructures will be required. These relate primarily to health, education and transport. The Plan, through the IDP, seeks to meet these needs as outlined within response to question 4.10, and supported by Table 1 in Appendix B.
- 4.12.2 These projects primarily meet needs over the short term (2020-2025) as is practicable. It is not considered feasible, nor supported by the relevant service providers, to commit to projects based on forecasted need over a longer time horizon.
- 4.12.3 The evidence base which underlies the identified need within the IDP supports this view. This relates to the uncertainty surrounding population projections over the longer term which, ultimately determines infrastructure required. For education, this is reflected in the School Place Planning Strategy, which plans

for schools over the short term (2019-2023). For all infrastructures, it is for this reason that the Council works closely with service providers to remain dynamic. This will ensure that any short-term need is identified and catered for without delay. To enable this responsive approach, the IDP is considered a live document, to be updated on an annual basis.

- 4.12.4 Identified needs for both health and education infrastructures have been arrived at by extrapolating the populations generated by development identified in the Housing Trajectory on a year-by-year, ward-by-ward basis over the Plan period. These figures create a projected demand which determines patient and pupil yields respectively, whilst considering other demographic and influencing factors such as population age and ethnicity, migration, and the quality of Brent's and surrounding Borough infrastructures.
- 4.12.5 The evidence has therefore been produced in accordance with anticipated growth in the Plan, and considers a wide range of variables to determine infrastructure need. This has been forecast by the relevant service providers, and in consultation with the Brent Planning team which has ensured the foundational evidence for the IDP is sound and robust.
- 4.13 *What evidence is there to support the identification and costs of these infrastructure requirements and is it sufficient and robust?*
- 4.13.1 The infrastructure requirements set out in the IDP have been identified through a number of robust evidence base documents. The Council engaged with all relevant stakeholders to further refine these requirements. This has brought them up to date, and better aligned with the Council's strategy as a whole.
- 4.13.2 The costs for these infrastructures have been arrived at using industry best practice assumptions on costs per square metre, such as the Building Costs Information Service (BCIS) provided by the Royal Institute of Chartered Surveyors. These are then indexed to reflect average Brent land values. This is considered sufficient and robust. However, these figures will age under changing market conditions and are likely to need updating over time. The IDP is therefore a live document, which will be updated on an annual basis, or as and when new information presents itself, in order to better reflect the planning landscape and needs of the Council at that time.
- 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?*
- 4.14.1 The Plan's end date is 2041. It is not considered possible, nor practical, to commit to the funding of all the identified projects within the IDP from the outset. Neither would this be supported by those whom the Council relies upon for supplementary funding.
- 4.14.2 As noted in the answer to question 4.10, the sites allocated within the Brent Local Plan are all brownfield sites. These sites generally have all essential

infrastructures available to them. It is accepted that these may need upgrading to support the higher densities proposed. This is for infrastructures such as water, electricity and gas. These infrastructures will be funded by the developer and service provider. Therefore, the majority of the infrastructures identified within the IDP do not represent a barrier to the delivery of new housing.

- 4.14.3 It is, however, necessary for the Council is to bring forward sustainable mixed-use communities. Where possible, the Council will seek for this infrastructure to be delivered through S106 planning obligations, and through other policy requirements as listed in the answer to question 4.15. For infrastructures which may be too large for delivery through S106, such as those listed on the Council's regulation 123 list, the Council will seek delivery through the allocation of Community Infrastructure Levy (CIL) funds.
- 4.14.4 The Council currently has at its disposal a significant amount of CIL yet to be allocated towards projects. This will help toward the delivery of some of the Phase 1 projects. The Council has also produced a very indicative estimate of expected CIL receipts extrapolated from the growth outlined within the Housing Trajectory. It is anticipated that CIL could potentially provide a further £300 million before the end of the Plan period. Where CIL and S106 are insufficient to fund required infrastructure projects, the Council will look to secure supplementary funds through other streams as necessary, such as the capital programme and other national and regional grant schemes. The Mayor in the draft London Plan has identified to Government that significant additional funding will be required to supplement funds generated by developments. This will be necessary to fund predicted deficits that would otherwise occur in infrastructure related to predicted population/development growth. Combined, this approach is seen as sufficient, and flexible enough to enable the delivery of the infrastructure requirements set out within the IDP.
- 4.14.5 In terms of funding education, the Council will use any basic need capital and CIL to fund any new school places needed. If this was insufficient to meet the infrastructure required, then the Council would look at the capital programme. The Council's annual update on Pupil Place Projections will trigger when specific education infrastructure is required, therefore, ensuring that infrastructure is aligned with demand. These updates are reported to Cabinet on an annual basis, allowing ongoing monitoring and review to take place.
- 4.14.6 Furthermore, there are a number of key projects supported in the 2020/21 – 2024/25 Capital Programme which will continue to support the delivery of infrastructure across the borough, including:
- educational facilities for United Colleges Group;
 - highways infrastructure works to unlock the delivery of homes as part of the ongoing estate regeneration in South Kilburn;
 - investment in Harlesden Town Centre including the acquisition and fit out of Picture Palace to deliver much needed cultural, community and workspace to support the vibrancy of the high street and quality of life of local communities; and

- adult education centre, affordable workspace at Morland Gardens (as part of the wider regeneration of the Stonebridge area).

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?*

- 4.15.1 The Council's approach to developer contributions includes a combination of Section 106 Planning Obligations (S106), and the Community Infrastructure Levy (CIL). The Plan lists these two complementary funding streams as the primary financial means of delivery for the Plan in paragraph 7.1.3. The Plan does not go into detail on these, as it is not considered necessary to reiterate requirements set out in the planning regulations, or in national and regional planning policy.
- 4.15.2 Paragraph 2.14 of the Plan states the need to consider the Local Plan alongside other supporting documents, such as Supplementary Planning Documents (SPD's). The Council's S106 Planning Obligations SPD sets out the Council's position on these requirements. This looks to standardise the most common S106 obligations by setting thresholds and quantum's for delivery, of both financial and non-financial contributions. The Council is currently in the process of producing a more up to date S106 Planning Obligations SPD. The new SPD will better reflect the new Local Plan, providing more detailed guidance on a broader range of common S106 requirements. These requirements are also referenced within policy and supporting texts where necessary. S106 planning obligations are generally required where a development has the ability to meet these needs on site.
- 4.15.3 The Council will continue to use Community Infrastructure Levy (CIL)/s106 alongside its budgets and other central government funding to ensure timely delivery of necessary infrastructure. The primary tool available to the Council for the delivery of large infrastructure is CIL. The payment of CIL is standardised, with the Council's approach being laid out within the Brent CIL Charging Schedule. This list includes the requirements of Brent, Mayoral and Mayoral 2 CIL's. The IDP has been developed in order to guide CIL spend toward the objectively assessed need identified by the Council's evidence base documents.
- 4.15.4 On its own, CIL is insufficient to fund big new capital projects, however, it will be used to mitigate impact of particular development, and as such will contribute to the borough's infrastructure needs.
- 4.15.5 Where these requirements give rise to significant financial requirements upon developers, they have been taken together for consideration within the Council's Viability Assessment (Core_Gen_01). London Plan policy now puts the onus on London Boroughs in determining whether a site is financially viable, and therefore deliverable in light of the accumulated requirements of national, regional and Local Plan policy. Most notably, this takes into consideration the financial implications of CIL and affordable housing delivery

through S106. The Brent Viability Assessment is considered robust in that it considers all such variables collectively over a range of development typologies, and up to date in having been produced recently and is therefore relevant within the current financial climate.

- 4.15.6 Together, measures taken to standardise S106 and CIL developer contributions will provide developers with more certainty on the Council's requirements. This allows developers and landowners to produce more effective financial modelling for their schemes, helping to reduce risk. This in turn will stabilise land values, ensuring that the policies within the plan can be met, and the infrastructure delivered, within the viability parameters outlined within the Brent Viability Assessment.
- 4.16 *Overall, has the Plan been subject to a robust assessment of viability and does it comply with national policy and guidance?*
- 4.16.1 The viability of Plan policies has been tested by BNP Paribas Real Estate ('BNPPRE'), an expert company in this field. As noted in their report (Core_Gen_01), their assessment reflects and conforms fully to the methodology required by the 2019 National Planning Policy Framework and 2019 Planning Practice Guidance. It tests the cumulative impact of emerging policies alongside adopted Borough and Mayoral CIL charges.
- 4.16.2 The study methodology compares the residual land values of a range of typologies. These reflect the types of developments expected to come forward in the borough over the life of a new Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels of affordable housing) to a benchmark land value to reflect the existing value of land prior to redevelopment.
- 4.16.3 Brent is a complex borough and it is difficult to test every conceivable development scenario. Each site will have its own existing use value and development proposals will differ from site to site, responding as they must to the immediate urban context. Sales values also vary between different parts of the borough. PPG paragraph 003 recognises that planning authorities are not required to test every single site that is expected to come forward over the plan period. Instead it advocates a typology approach, based on the types of sites that are likely to come forward over the plan period. The Viability Assessment tests 31 development typologies with nine sales values or 'price points' against three benchmark land values reflecting the spread of existing use values in the Borough. The study therefore reflects some 837 development scenarios, which the Council considers to be a reflective sample for testing purposes.
- 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?*

- 4.17.1 Policy BE2 seeks to protect existing industrial floorspace in SILs and LSISs within East Lane, Northfields, Wembley, Alperton Central, Alperton South, Brentfield Road and Kingsbury. Development will be permitted for B1c, B2 and B8 floorspace to replace or increase the amount of employment floorspace already on-site. Limited vacancy levels and both the Council's and GLA's employment land studies indicate significant demand for existing industrial floorspace (as evidenced by increasing rents over the past five years in response to losses of existing space for redevelopment).
- 4.17.2 Although the viability study indicates that replacement of existing industrial floorspace would be unviable as a speculative commercial development, occupiers of space will redevelop existing buildings for operational purposes. For example, an occupier may require more space to accommodate an expansion of its business and would do so for operational purposes and not as a commercial development opportunity. In addition, should there be a significant change in circumstances which makes development of industrial space more viable, the policy provides for a positive context to allow intensification to happen.
- 4.17.3 Policy BE2 identifies that intensification in other SILs and LSISs in Brent will be permitted, including co-location of other uses if required to cross-subsidise the employment floorspace. The Viability Assessment indicates that redevelopment of industrial floorspace is viable when co-located with other uses, including residential and offices. Policy BE2 is therefore effective in protecting much needed existing floorspace from loss to other uses, but also identifies SILs and LSISs which can be subject to intensification, supported by other uses if necessary.
- 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.*
- 4.18.1 As noted in response to question 4.9, the PPG explicitly states at paragraph 003 that "assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable" The Council is not required to test each site allocation, nor is it required to demonstrate that they are all viable.
- 4.18.2 PPG paragraph 003 goes on to state that "Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence". PPG paragraph 003 indicates that more detailed site-specific assessment may be required where the delivery of a plan depends on a particular site. The Council does not have a particular reliance on a few very large sites for the majority of its development delivery, such as sustainable urban extensions. Growth Areas are generally subject to multiple landownerships, which invariably means sites come forward on an individual basis, consistent with the range of typologies identified. Growth areas in single ownership, such as Northwick Park (One Public Estate), or South Kilburn (LB Brent) have been subject to on-going viability assessment work. These have informed the masterplans that the Plan reflects in policy. Where Growth Area proposals are less well advanced and identified as being

subject to further masterplanning, e.g. Neasden Stations or Staples Corner, viability assessment will form an integral part of that process. This will ensure that the preferred scheme is deliverable.

- 4.18.3 The typologies have been formulated to reflect the range of sizes of scheme (5 units to 1,000 units) and other uses (offices, retail and industrial). The site allocations are in a range of existing uses, which again is covered by the range of benchmark land values used in the Viability Study.
- 4.18.4 The emerging Plan policies have been assessed for their cost implications, as set out at Appendix 1 of the Viability Study. Policies which have specific cost implications have been tested, as outlined in Section 4 of the study. The cumulative impact of those requirements are tested in the study.
- 4.18.5 The site allocations envisage delivery at various points in the plan. The Council's policies on affordable housing (BH5) fully reflect the Mayor of London's two-track approach which allows schemes delivering 35% affordable housing through the 'fast track' but a 'viability tested' route for schemes that are not able to deliver the full 35%. Over the plan period, the Council anticipates that more schemes will deliver 35% affordable housing, but this will be determined by market cycles and any changes to underlying existing use values over time. As noted above, the Council is not required to demonstrate that all site allocations are currently viable, but none of the emerging Plan policies will prevent sites from being brought forward.
- 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.*
- 4.19.1 The Council has reviewed the viability information in this regard. Pre-application discussions and submitted planning applications give the Council confidence that the policy approach to re-provision of mixed use industrial residential of around 0.65 industrial plot ratio is not an impediment. Nevertheless, on reflection the assessment of medium and smaller sites for mixed use residential and industrial is probably under-represented within the assessment. The Council has asked BNP Paribas to undertake more scenario testing in relation to industrial typologies. This will be provided as an addendum to the existing study in due course.
- 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?*
- 4.20.1 Yes. Appendix 1 of the Viability Study reviews all the emerging policies in the Plan and assess their potential impact on costs. Where costs arise, these are identified in Section 4 of the Viability Study.

- 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?*
- 4.21.1 The methodology applied in the Viability Study is fully consistent with the approach required by the PPG and is identical to the approach adopted widely for the assessment of Local Plan policies that have been examined.
- 4.21.2 The conclusions drawn from the evidence consider two core issues; firstly, that not all development scenarios tested are viable at current costs and values; and secondly, the inherent flexibility in key plan policies (most notably affordable housing) which makes provision for sites to come forward with a lower contribution than the 35% target based on a proven site-specific viability assessment.
- 4.21.3 Policy BH5 seeks 35% affordable housing in line with the 'threshold' approach in the Mayor of London's 'Viability and Affordable Housing Supplementary Planning Guidance' which is also reflected in the new London Plan. The tenure mix sought in the Plan (70% London Affordable Rent and 30% intermediate) is fully compliant with the London Plan approach, which requires 30% London Affordable Rent, 30% intermediate and 30% with a tenure mix of individual boroughs' own requirement.
- 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, built to rent and affordable housing?*
- 4.22.1 Development in Brent will be subject to normal market cycles of the Plan period, as is the case in all other local planning authority areas. The Plan itself cannot do anything to offset adverse movements in sales values, costs and underlying existing use values that might impact scheme viability. However, it must also be recognised that the Plan seeks to mediate between private and community interests to secure standards and obligations to mitigate the harm of development and provide supporting community infrastructure. The Plan is sufficiently flexible to secure the objectives of Policy BH1 by identifying opportunities for growth and securing the maximum benefits for the communities in which growth will be located, while at the same time recognising that in some periods over the life of the plan, the extent of the benefits secured may vary.
- 4.22.2 The Viability Assessment tests the ability of a range of development typologies reflective of the scale and type of sites that are likely to be brought forward over the plan period. The outputs of the appraisals vary, depending on sales values, built form and underlying existing use value. Some development scenarios are reported to be viable at the level of affordable housing sought by policy BH5, while others are not. This is reflective of the Council's experience of live applications, and also mirrors the situation found in other

London boroughs. However, viability assessments are essentially a snapshot of the situation and even with sensitivity testing, they cannot fully determine the outcomes of every single development opportunity over the Plan period. The Viability Assessment does, however, confirm that there are many combinations of development typology with benchmark land value that generate viable outcomes at the level of affordable housing sought in Policy BH5. Critically, the key plan policies contain sufficient flexibility to ensure that schemes can come forward with lower contributions where this is justified by viability evidence. Beyond offering this flexibility, there is nothing more that a planning authority can do in the face of adverse market cycles.

- 4.22.3 The Viability Assessment tests specialist forms of housing, including co-living schemes, student housing schemes and housing for older people. Student housing is tested to reflect the requirements of London Plan Policy H17A4, namely 35% of units to be provided at affordable rent levels (defined by reference to the maximum maintenance loans available to students). The results of the Viability Assessment show that the viability of student housing schemes will not be adversely affected by this requirement.
- 4.22.4 The Viability Assessment tests build for rent (BtR) schemes and these tend to be challenging to bring forward due to their different economics. Again, the Council's requirement is applied flexibly and BtR schemes can be brought forward with lower proportions of affordable housing if robust evidence is provided to support a viability issue.
- 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?*
- 4.23.1 The Plan identifies the likely level of housing and other floorspace based on acceptable heights and densities. The Borough has a strong record of delivering new housing, as evidenced by performance against the housing delivery test. This has been against the backdrop of a relatively flat housing market and softening of dwelling prices in that period. Delivery indicates that there is nevertheless, strong developer appetite and significant demand from occupiers. Delivery of other commercial uses has been variable and largely consistent with experience within other outer London boroughs, reflective of its place within the hierarchy of the London market. With regards deliverability of site allocations, the Local Plan's policies for the most part do not divert from the existing policy context, which has shown delivery is possible, albeit with variable performance against affordable housing targets.
- 4.23.2 Perhaps the most significant area of change within allocations is seeking to maximise ground/lower floor industrial floorspace provision in association with residential development. This is reflective of the need to meet two London Plan strategic policy requirements of providing additional homes and providing for industrial floorspace needs on the basis of evidence. Due to the impact of the emerging London Plan and the draft Local Plan's policies, the Council more recently has been in receipt of planning applications and pre-apps for 0.65 plot ratio industrial or re-provision of existing amount in residential schemes.

These indicate that the market is adapting to the new requirement, although provision of affordable housing to be able to take advantage of the fast track approach is challenging.

- 4.23.3 Clearly, the Council does not control all the relevant 'levers' that make development in its area viable; it controls planning policy but not underlying benchmark land values, sales values, commercial rents and investment yields, build costs, finance costs and levels of profit. The planning policy with the most significant impact on viability is BH5 and as noted previously, this is applied flexibly so that schemes can come forward over the economic cycle.

Appendix A

Statement from TfL (in support of Q 4.6)

TfL's view is that if bespoke modelling is required, this needs to be identified at the formative stage of a local plan through engagement with the local authority and TfL. However, TfL's approach is centred around London-wide modelling in support of the London Plan. TfL therefore does not believe LB Brent could have reasonably foreseen the need for such analysis without a specific and early request from Highways England.

In TfL's view:

- LB Brent's site allocations are robust and have been extensively consulted on. The housing delivery test and five year supply requirements are in place so LB Brent have to plan positively to meet them. This results in a high target and our position is that identified growth areas which are connected by public transport and have local amenities are a key source of supply to meet this need. Under-delivering in these locations could require more homes in less sustainable locations, which will likely be more car-dependent and add more pressure to HE's network (as well as TfL's road network)
- LB Brent's plan is in line with the residential parking standards in the new London Plan which will go much further to manage demand. Should it be necessary, TfL would fully support more restrictive parking standards to further reduce the impact on HE's network
- Separately, TfL and the Mayor are delivering and investigating approaches to reduce travel demand by car, at least some of which are necessarily not within LB Brent's control. This includes pricing schemes, road space reallocation and improvements to walking, cycling and public transport. These schemes are taken into account in TfL's strategic modelling
- There is population growth across both London and the wider south east. LB Brent cannot influence the generation of car travel outside of its boundaries, such as where significant levels of parking with new homes and commercial developments
- Much of the demand for travel at J1 will involve trips that do not start or end in Brent. This means the capacity issue is a strategic one, which is why TfL carried out strategic modelling to test the London Plan and Mayor's Transport Strategy
- Accommodating growth is required by Government and the NPPF and LB Brent should do what it can to mitigate impacts but the issues HE raise ultimately relate to strategic issues that are beyond the scope of the local plan.

Appendix B MIQ4 Table 1, Infrastructure Projects by Phase (separate document)

Phase 1

Place/ site allocations	Site allocation	Indicative housing growth	Infrastructure required	Approximate cost	Funding source	Delivery agency	Comments
South East	BESA3 CARLTON HOUSE	-40					South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably.
South East	BESA4 CARLTON INFANT SCHOOL	70					
South East	BESA5 CRAIK	15					
South East	BESA8 HEREFORD HOUSE & EXETER COURT	3					
South East	BESA10 NEVILLE & WINTERLEYS	-16					South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably.
South East	BESA11 OLD GRANVILLE OPEN SPACE	62					
South East	BESA12 WORDSWORTH, MASEFIELD AND PART OF SOUTH KILBURN OPEN SPACE	-78	Primary school– replacement provision.	£ 8,600,000.00	DfE (Basic Need), S106, Capital Schools Programme	Brent Council	South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably. School replacing residential on this site also.
South East	BESA23 FORMER WILLESSEN POLICE STATION	-167					South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably.
South East	BESA25 PARK AVENUE GARAGES	-72					South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably.
South East	BESA27 CAR WASH STRODE ROAD	20					
South East	BESA31 TURPIN’S YARD	20					

South East	N/A	N/A	Islamia Primary School expansion to 2FE on current site.	£ 10,010,000.00	DfE (Basic Need), s106, DfE Targeted Capital, Capital Schools Programme	Brent Council	Expansion of existing Islamia Primary school to meet increased demands generated from surrounding development/ population growth.
South East	N/A	N/A	Investment in Willesden Centre for Health and Care and relocation of primary care from no longer fit for purpose/over-utilised premises	£ 4,400,000.00	CIL, S106, ETTf funding	Brent CCG/NHS PS	
South East	16/4174 (PEEL SITE SOUTH KILBURN ESTATE)	-18	New primary care centre	£ 2,900,000.00	S106 in kind, CIL S106	Brent CCG	South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably.
North	BNSA1 CAPITOL WAY VALLEY	381					
North	BNSA3 QUEENSBURY LSIS AND MORRISONS	194					
North West	BNWGA1 NORTHWICK PARK GROWTH AREA	654	Access improvements to Northwick Park hospital site Primary Care facility (Phase 1/2)	9900000 Primary care facility TBD	Housing Infrastructure Fund One Public Estate, CIL, S106	One Public Estate Brent CCG/LNWUHT/LBB/TfL	
South	BSSA1 ASIATIC CARPETS	24					
South	BSSA3 CHURCH END LOCAL CENTRE	34					
South	BSSA4 CHAPMAN'S AND SAPCOTE INDUSTRIAL ESTATE	29					
South	BSSA6 ARGENTA HOUSE & WEMBLEY POINT	8					
South	BSSA8 MCGOVERN'S YARD	99					
South	BSSA10 DUDDEN HILL COMMUNITY CENTRE	245					
South	BSSA12 296 - 300 HIGH ROAD	569					
South	BSSA13 LEARIE CONSTANTINE CENTRE	26					
South	BSSA14 MORLAND GARDENS	65	Footbridge and cycle route at Brentfield Road junction	£ 2,000,000.00	TfL Capital, Developer funding	Brent Council, TfL	
South	BSSA19 CHANCEL HOUSE	0	6FE secondary school (North Brent School)	£ 30,000,000.00	DfE Free School Capital Programme	Brent Council	
East	BEGA1 NEASDEN STATIONS GROWTH AREA	121	To be determined by forthcoming masterplan. West London Orbital line (Phase 1/2)	£ 132,500,000.00	TfL, CIL, DoT	Network Rail/ TfL	WLO costs split over BEGA1 & BEGA2, over Phases 1 and 2. Total projected cost is £265,000,000.
East	BESA1 COOMBE ROAD	42					
East	BESA3 5 BLACKBIRD HILL	57					
South West	BSWSA1 ALPERTON INDUSTRIAL SITES	1324					

South West	BSWSA3 ATLIP ROAD	220					
South West	BSWSA4 SUNLEIGH ROAD	26					
South West	BSWSA5 ABBEY MANUFACTURING ESTATE	14					
South West	BSWSA6 BERESFORD AVENUE	135					
South West	BSWSA7 NORTHFIELDS	662	New primary care centre	N/A	S106 in kind	Brent CCG	
South West	BSWSA8 WEMBLEY HIGH ROAD	310					
South West	BSWSA9 FORMER COPELAND SCHOOL	250					
South West	BSWSA12 KEELERS SERVICE CENTRE	22					
South West	BSWSA15 EMPLOYMENT LAND ON HEATHER PARK DRIVE	80					
South West	BSWSA16 CARPHONE WAREHOUSE 416 EALING ROAD	36					
South West	BSWSA17 FORMER WEMBLEY YOUTH CENTRE/ DENNIS JACKSON CENTRE	112					
Central	BCSA4 FIFTH WAY/ EURO CAR PARTS	450					
Central	BCSA6 WATKIN ROAD	342					
Central	BCSA7 WEMBLEY PARK STATION (NORTH & SOUTH)	456					
Central	BCSA8 WEMBLEY RETAIL PARK	569					
Central	BCSA9 FIRST WAY	550					
Central	BCSA10 YORK HOUSE	0	New primary school	N/A	S106 in kind	Brent Council	
Central	N/A	N/A	New health care centre	£ 500,000.00	CIL	Brent Council/ Brent CCG	Delivery in Wembley Stadium to meet additional needs generated from growth in Wembley Park.
Borough-wide	N/A	N/A	Additional Secondary School provision - expansion of existing secondary schools	£ 35,100,000.00	DfE (Basic Need and Special Provision Capital), CIL, Brent Council	Brent Council	
Total	50	7905	12	£ 226,010,000.00			

Phase 2

Place/ site allocations	Site allocation	Indicative housing growth	Infrastructure required	Approximate cost	Funding source	Delivery agency	Comments
South East	BESA1 AUSTEN	135					
South East	BESA10 NEVILLE & WINTERLEYS	84					
South East	BESA4 CARLTON INFANT SCHOOL	10					
South East	BESA13 JOHN RATCLIFFE HOUSE	50					
South East	BESA14 WILLIAM DUNBAR HOUSE AND WILLIAM SAVILLE HOUSE	70					
South East	BESA17 CRICKLEWOOD BROADWAY RETAIL PARK	35					
South East	BESA18 245 – 289 CRICKLEWOOD BROADWAY	42					
South East	BESA2 BLAKE	-36					South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably.
South East	BESA22 QUEEN'S PARADE	2					
South East	BESA23 FORMER WILLES DEN POLICE STATION	200					
South East	BESA25 PARK AVENUE GARAGES	40					
South East	BESA26 PARK AVENUE NORTH SUBSTATION	50					
South East	BESA28 80 STRODE ROAD	-63					South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably.
South East	BESA32 45-55 CRICKLEWOOD BROADWAY	228					
South East	BESA34 KILBURN PARK UNDERGROUND STATION	20					

South East	BESA6 CRONE & ZANGWILL	-23	Road improvements	£ 1,060,000.00	CIL & Land receipt	Brent Council, Developer	South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably.
South East	BESA7 DICKENS	-147					South Kilburn Estate regeneration programme. Negative figures are a result of regeneration as cannot achieve current densities sustainably.
South East	BESA31 TURPIN'S YARD	10					
South East	BESA8 HEREFORD HOUSE & EXETER COURT	5					
North	BNSA1 CAPITOL WAY VALLEY	120					
North	BNSA2 COLINDALE RETAIL PARK, MULTI-STOREY CAR PARK AND SOUTHON HOUSE	300					
North	BNSA3 QUEENSBURY LSIS AND MORRISONS	40					
North	BNSA8 QUEENSBURY UNDERGROUND STATION CAR PARK	36					
North	BNSA6 EX-VOLKSWAGEN GARAGE	28					
North West	BNWGA1 NORTHWICK PARK GROWTH AREA	906	Primary Care Facility (Phase 1/2)	Primary care facility TBD	One Public Estate, CIL, S106	Brent CCG/LNWUHT/LBB/TfL	
North West	BNWSA1 KENTON ROAD SAINSBURY'S AND ADJOINING LAND	150					
South	BSSA1 ASIATIC CARPETS	26					
South	BSSA3 CHURCH END LOCAL CENTRE	160					
South	BSSA9 BARRY'S GARAGE	40					
South	BSSA18 HARLESDEN TELEPHONE EXCHANGE	27					
South	BSSA8 MCGOVERN'S YARD	9					
South	BSSA5 WILLESDEN BUS DEPOT	40					
South	BSSA7 BRIDGE PARK & UNISYS BUILDING	275					
South	BSSA11 EURO CAR RENTAL	15					
South	BSSA15 HARLESDEN STATION JUNCTION	3					

South	BSSA16 MORDAUNT ROAD	8					
South	N/A	N/A	Conversion of non clinical to clinical space to increase capacity at Monks Park facility.		CIL, S106	Brent CCG/CLCH	Enhancement of facilities at Monks Park centre to meet additional demand from surrounding development/ population growth.
East	BEGA1 NEASDEN STATIONS GROWTH AREA	779	To be determined by forthcoming masterplan. West London Orbital line (Phase 1/2)	£ 66,125,000.00	TfL, CIL, DoT	Network Rail/ TfL	WLO costs split over BEGA1 & BEGA2, over Phases 1 and 2. Total projected cost is £265,000,000.
East	BEGA2 STAPLES CORNER GROWTH AREA	200	To be determined by forthcoming masterplan. West London Orbital line (Phase 1/2)	£ 66,125,000.00	TfL, CIL, DoT	Network Rail/ TfL	WLO costs split over BEGA1 & BEGA2, over Phases 1 and 2. Total projected cost is £265,000,000.
East	BESA1 COOMBE ROAD	37					
East	WEST LONDON ORBITAL	N/A	West London Orbital line (Phase 1/2)	£ 132,500,000.00	TfL, CIL, DoT	Network Rail/ TfL	
South West	BSWSA11 WEMBLEY CUTTING NORTH, MOSTYN ROAD	15					
South West	BSWSA1 ALPERTON INDUSTRIAL SITES	151					
South West	BSWSA3 ATLIP ROAD	230					
South West	BSWSA4 SUNLEIGH ROAD	211					
South West	BSWSA5 ABBEY MANUFACTURING ESTATE	386					
South West	BSWSA7 NORTHFIELDS	862	New pedestrian bridge over canal	£ 2,000,000.00	CIL, GLA Housing Zone funding	Brent Council, St. George.	
South West	BSWSA8 WEMBLEY HIGH ROAD	84					
South West	BSWSA10 ELM ROAD	400					
South West	BSWSA14 SUDBURY TOWN STATION CAR PARK	30					
South West	BSWSA16 CARPHONE WAREHOUSE 416 EALING ROAD	2					
South West	BSWSA17 FORMER WEMBLEY YOUTH CENTRE/ DENNIS JACKSON CENTRE	57					
Central	BCSA2 STADIUM RETAIL PARK & FOUNTAIN STUDIOS	966	Junction Improvements on Empire Way - Fulton Road	£ 1,250,000.00	TfL LIP, Quintain S106	Brent Council	

Central	BCSA3 BROOK AVENUE	110	Public Realm Improvements	£ 350,000.00	CIL	Brent Council	
Central	BCSA4 FIFTH WAY/ EURO CAR PARTS	50					
Central	BCSA6 WATKIN ROAD	450					
Central	BCSA7 WEMBLEY PARK STATION (NORTH & SOUTH)	100					
Central	BCSA8 WEMBLEY RETAIL PARK	693					
Central	BCSA12 LAND TO SOUTH OF SOUTH WAY	50					
Central	BCSA19 WEMBLEY PARK STATION, POLICE STATION AND ADJACENT LAND BRIDGE ROAD	60					
Central	BCSA1 ASDA/ THE TORCH/ KWIKFIT	93					
Central	BCSA9 FIRST WAY	1710					
Central	BCSA11 COLLEGE OF NORTH WEST LONDON WEMBLEY	155					
Central	BCSA13 FORMER MALCOLM HOUSE SITE	100					
Total	64	10876	9	£ 269,410,000.00			

Phase 3

Place/ site allocations	Site allocation	Indicative housing growth	Infrastructure required	Approximate cost	Funding source	Delivery agency	Comments
South East	BSESA14 WILLIAM DUNBAR HOUSE AND WILLIAM SAVILLE HOUSE	30					
South East	BSESA17 CRICKLEWOOD BROADWAY RETAIL PARK	15					
South East	BSESA23 FORMER WILLESDEN POLICE STATION	180					
South East	BSESA25 PARK AVENUE GARAGES	40					
South East	BSESA7 DICKENS	197					
South East	BSESA29 WILLESDEN TELEPHONE EXCHANGE	5					
South East	BSESA30 61-65 SHOOT UP HILL	20					
South East	BSESA33 123-129 CRICKLEWOOD BROADWAY	12					
South East	BSESA35 303-309 CRICKLEWOOD BROADWAY	12					
North	BNSA1 CAPITOL WAY VALLEY	599					
North	BNSA2 COLINDALE RETAIL PARK, MULTI-STOREY CAR PARK AND SOUTHON HOUSE	200					
North	BNSA3 QUEENSBURY LSIS AND MORRISONS	149					
North	BNSA5 FORMER KINGSBURY LIBRARY AND COMMUNITY CENTRE	27					
North West	BNWGA1 NORTHWICK PARK GROWTH AREA	1040	To be determined by forthcoming masterplan				
South	BSSA3 CHURCH END LOCAL CENTRE	190					

South	BSSA18 HARLESDEN TELEPHONE EXCHANGE	25					
South	BSSA8 MCGOVERN'S YARD	45					
South	BSSA2 B&M HOME STORE & COBBOLD INDUSTRIAL ESTATE	160					
South	BSSA10 DUDDEN HILL COMMUNITY CENTRE	70					
South	BSSA5 WILLESSEN BUS DEPOT	20					
South	BSSA7 BRIDGE PARK & UNISYS BUILDING	230					
South	BSSA11 EURO CAR RENTAL	10					
East	BEGA1 NEASDEN STATIONS GROWTH AREA	657	To be determined by forthcoming masterplan				
East	BEGA2 STAPLES CORNER GROWTH AREA	1000	To be determined by forthcoming masterplan				
South West	BSWSA1 ALPERTON INDUSTRIAL SITES	200					
South West	BSWSA2 SAINSBURY'S ALPERTON	200					
South West	BSWSA4 SUNLEIGH ROAD	158					
South West	BSWSA5 ABBEY MANUFACTURING ESTATE	90					
South West	BSWSA7 NORTHFIELDS	750					
South West	BSWSA16 CARPHONE WAREHOUSE 416 EALING ROAD	12					
Central	BCSA3 BROOK AVENUE	260					
Central	BCSA6 WATKIN ROAD	38					
Central	BCSA12 LAND TO SOUTH OF SOUTH WAY	250					
Central	BCSA1 ASDA/ THE TORCH/ KWIKFIT	392					
Central	BCSA14 ST JOSEPH'S SOCIAL CLUB, EMPIRE WAY	60					
Total	35	7343	3	£	-		