

Further Modifications Proposed to the draft Brent Local Plan October 2019 submitted for consideration following the Inspectors' Matters, Issues and Questions.

This document consolidates and replaces the proposed modifications documents identified as Core_04a and Core_04b that were previously issued by the Council. Additionally, it includes proposed modifications resultant from the Matter 3 examination hearings session.

1. This schedule sets out proposed Main and Minor Modifications to the draft Brent Local Plan October 2019 that it is proposed will be submitted for consideration as part of the Examination process to address representations of soundness and other representations on the documents contents, plus other changes considered appropriate to improve the Plan. This is addition to those already identified in Core_04 Schedule of Proposed Modifications submitted with the draft Plan in March 2020.

2. The proposed Modifications are generally expressed in the form of ~~strike through~~ for deletions of text and underlined for additions of text and are set out in the same order as the Local Plan.

Main modifications are included in the first schedule. These are changes to policy wording. The second schedule contains Proposed Minor Modifications. These are changes to supporting text or factual, grammatical or other changes. A third schedule sets out the Proposed Changes to the Policies Map. A fourth schedule sets out changes to other documents supporting the Local Plan.

Main Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM258	Places	All site allocations: add PTAL rating.	Consistent approach for all to identify current PTAL and PTAL estimated in 2031	To provide the same type of information for all detailed site allocations.
MM259	Places	Place Policies	Provide the number of dwellings to be delivered in the Place by 2041 and within that policy the Growth Areas within each place to reflect the numbers that are in the Housing Trajectory August 2020, or any subsequent figures agreed as part of the Examination process. Specific modifications to be set out at a later date. Superseded by proposed modifications below.	To provide clarity on strategic housing delivery numbers across the Places and Strategic sites
MM260	Places	Growth Areas and Site Allocations	Update the indicative capacity and phasing to reflect the numbers that are in the Housing Trajectory August 2020, or any subsequent figures agreed as part of the Examination process. Specific modifications to be set out at a later date.	To provide clarity on the indicative housing delivery and its timing in

				growth areas and allocations.
MM261 (see site allocations below)	Places	Growth Areas and Site Allocations	To make appropriate reference to the contents of the recommendations of the Strategic Flood Risk Assessment August 2020 on sites affected by potential flooding. Specific modifications to be set out at a later date.	To provide clarity on what the development needs to do to make it safe and not increase the risk of flooding on or off site.
MM297	5.1 Central	Policy BP1 criterion d)	<u>Minimum of 13,700 additional homes in the period to 2041, which will be predominantly achieved through residential-led mixed use development within the Wembley Growth Area (that also crosses into the South West Place) will be supported which in total will deliver delivering a total of over 15,000 new homes, principally within the Wembley Park development.</u>	To provide clarity on strategic housing delivery numbers across the Places (In response to MIQs).
MM263	5.1 Central	BP1 g)	"Planning for the development of 6,700-300 <u>300</u> sqm comparison goods <u>retail</u> floorspace by 2028, and 6,100-300 <u>300</u> sqm of convenience goods <u>retail</u> floorspace, in addition to that already existing and consented, directed towards Wembley and Wembley Park town centres to support their future designation as a single metropolitan centre at the London Plan level"	To align floorspace quantum's with those recommended within table 2.1 of the Retail and Leisure Needs study (EB_E_06).
MM264	5.1 Central	BP1 h)	"Providing at least one additional foodstore of between 1,000 and 2,000sqm"	To align floorspace quantum's with those recommended within table 2.1 of the Retail and Leisure Needs study (EB_E_06).
MM306	5.1 Central, BCSA2	Planning Considerations	Add after 'All proposed development will require a detailed Flood Risk Assessment (FRA): <u>'Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM307	5.1 Central, BCSA3	Planning Considerations	Add after 'As the site is over one hectare all development will be required to undertake a detailed Flood Risk Assessment (FRA): <u>'Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.

MM308	5.1 Central, BCSA6	Planning Considerations	Add after 'A Flood Risk Assessment will be required as part of any development coming forward': <u>'Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM262	5.1 Central, BCSA8	Design Principles	<u>'.....Building height and massing should respond to surrounding development coming forward as part of the Wembley Park redevelopment. The massing set out as such to protect the views of the stadium. The ground floor should provide an active frontage on Rutherford Way/Fulton Road and Engineers Way.'</u>	To provide more clarity on design principles it is expected that the development will need to achieve.
MM309	5.1 Central, BCSA11	Planning Considerations	Add after 'A Flood Risk Assessment will be required as part of any development coming forward': <u>'Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM315	5.1 Central, BCSA16	Figure 10 Other site Allocations Page 77	Under 'comments', add after '...granted through 18/0968.': <u>'Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM265	5.2 East	BP2 Criterion c)	<u>"...Within Neasden town centre this will be 6 5 storeys will also be appropriate.</u>	To reflect heights as set out in BD2.
MM298	5.2 East	BP2 criterion e)	<u>Minimum of 5,400 additional homes in the period to 2041, the potential residential development for Staples Corner Growth Area (around 2,200 homes) and Neasden Stations' Growth Area (around 2,000 homes) will be determined by their respective masterplans, taking account of the need to support additional employment space on site. Depending on the capacity of these sites there may be specific requirements around different housing types, such as specialist (older people/supported/ student) housing and build to rent.</u>	To provide clarity on strategic housing delivery numbers across the Places (In response to MIQs).
MM266	5.2 East	BP2 New after j)	<u>"Provide up to 500 sqm comparison goods retail floorspace, and 200 sqm convenience foods retail floorspace by 2028. This should be directed toward Neasden town centre."</u>	To align floorspace quantum's with those recommended within table 2.1 of the Retail and

				Leisure Needs study (EB_E_06).
MM313	5.2, East, BEGA1	Planning Considerations	Add after “More detailed assessment will be required through a site specific flood risk assessment”: <u>‘Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2’.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM310	5.2 East, BESA1	Planning Considerations	Add after “A site specific Flood Risk Assessment will be required and a sequential approach to the local of uses followed”: <u>‘Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2’.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM299	5.3 North	BP3 North criterion d)	<u>Minimum of 2,800 additional homes in the period to 2041, principally through the continued residential development within the Burnt Oak and Colindale Growth Area (around 2,100 homes).</u> The potential residential development for the extension of the Burnt Oak and Colindale Growth Area, referred to as Capitol Valley, will be determined by a masterplan, taking into account the need to intensify employment use on the site.	To provide clarity on strategic housing delivery numbers across the Places (In response to MIQs).
MM267	5.3 North	BP3 k)	“Provide up to 4,400 sqm of net comparison goods floorspace, up to 3,600 sqm <u>1,600 sqm of net convenience foods retail floorspace, up to 500200 sqm class A3 café/ restaurant floorspace and 200100 sqm class A4 drinking establishment floorspace</u> by 2028. This floorspace should be directed towards the three town centres.	To align floorspace quantum’s with those recommended within table 2.1 of the Retail and Leisure Needs study (EB_E_06). Also reflects changes to Use Class Order.
MM316	5.3, North, BNSA8	Figure 17, Other site Allocations Page 129	Under ‘comments’, add after ‘...Turner Road’: <u>‘Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2’.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM300	5.4 North West	BP4 North West	<u>Minimum of 3,300 additional homes in the period to 2041, principally through the providing approximately 2,600 new homes as part of development within the Northwick Park</u>	To provide clarity on strategic housing delivery numbers across the

			Growth Area (around 2,600 net additional homes), including specialist accommodation to meet identified demand.	Places (In response to MIQs).
MM268	5.4 North West	BP4 f)	“Supporting the creation of new Provide up to 900 sqm comparison goods retail floorspace, 500 sqm convenience goods retail floorspace, 100 sqm café and restaurant floorspace, and 100 sqm of drinking establishment floorspace. This should be directed toward within Preston Road and Kenton town centres providing that they are of an appropriate scale, to support their local function.”	To align floorspace quantum’s with those recommended within table 2.1 of the Retail and Leisure Needs study (EB_E_06). Also reflects changes to Use Class Order.
MM301	5.5 South	BP5	<u>Minimum of 4,900 additional homes in the period to 2041. Church End Growth Area providing over 1,300 new homes</u> will be extended to include adjoining industrial sites and a masterplan produced to guide its improvement to a mixed use neighbourhood.	To provide clarity on strategic housing delivery numbers across the Places (In response to MIQs).
MM302	5.5 South	BSGA1	“...Church End Growth Area will deliver over 1,300 1,040 new homes to 2041, supported by social and physical infrastructure to include:....”	To reflect the updated housing trajectory (In response to MIQs).
MM269	5.5 South	BP5 h)	“... New convenience and Provide up to 4,800 sqm of net comparison retail retail floorspace, and 900 convenience foods retail floorspace. This will should be directed toward <u>Church End and Harlesden town centres.</u> ”	To align floorspace quantum’s with those recommended within table 2.1 of the Retail and Leisure Needs study (EB_E_06).
MM311	5.5 South, BSSA6	Planning Considerations	Add after “...accumulated surface water build up”: <u>‘Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2’.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM312	5.5 South, BSSA7	Planning Considerations	Add after “...must contribute to flood risk management and reduction”: <u>‘Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2’.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM270 (see below)	5.6 South East	BP6 Criterion d	South Kilburn Growth Area will deliver approximately 3,400 2,100 new high quality homes, or around 800 net additional homes once demolitions are taken into account, over the	To better reflect gross and net development within the South Kilburn

			<u>Plan period with a target of 50% affordable including social rented for existing secure tenants of South Kilburn.</u>	<u>growth area over the lifetime of the Local Plan.</u>
MM270	5.6 South East	BP6 Criterion d)	Edit previously proposed MM270 to provide consistency across the Place policies with Growth Area dwelling delivery set out in the respective growth area policies <u>“ Minimum of 5,100 additional homes in the period to 2041 with an important component being South Kilburn Growth Area will deliver approximately 3,400 over 2,100 new high quality homes (or a minimum 800 net additional homes once demolitions are taken into account), with a target of 50% affordable including social rented for existing secure tenants of South Kilburn estate.”</u>	To provide clarity on strategic housing delivery numbers across the Places and consistency of approach across the Place policies. (In response to MIQs)
MM271	5.6 South East	BP6 j)	<u>“... Provide up to 7,200 sqm net comparison retail floorspace, to be directed to Kilburn town centre in the first instance. Provide up to 7,500 sqm net convenience retail floorspace, 600 café and restaurant floorspace, and 300 drinking establishment floorspace across the town centres of Cricklewood, Willesden Green, Queen’s Park and Kensal Rise will provide convenience retail for local communities...”</u>	To align floorspace quantum’s with those recommended within table 2.1 of the Retail and Leisure Needs study (EB_E_06). Also reflects changes to Use Class Order.
MM303	5.6 South East	BSEGA1	<u>“...South Kilburn Growth Area will deliver approximately 3,400 over 2,100 new homes (or a minimum 800 net additional homes once demolitions are taken into account) to 2041, supported by social and physical infrastructure to include:....”</u>	To better reflect gross and net development within the South Kilburn growth area over the lifetime of the Local Plan.(In response to MIQs)
MM317	5.6 South East BSESA8	Planning Considerations	Add: <u>‘Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2’.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM174	5.6 South East BSESA25	Other site allocations Fig.27, p.233	Under ‘comments’, add to amendment already proposed: <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2’.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.

MM314	5.6 South East BSESA31	Other site allocations Fig.27, p.233	Under 'comments', after ..'in accordance with policy BE3 required': <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'.</u>	In response to the Regulation 19 actions, and hearing session for Matter 3.
MM304	5.7 South West	BP7 d)	<u>"Minimum of 10,600 additional homes in the period to 2041 through Continuing residential-led mixed-use development within the Alperton Growth Area (minimum 6,800 additional homes) and Wembley Growth Area (that also crosses into the Central Place) and Alperton Growth Areas, the Ealing Road and Sudbury town centres and intensification corridors."</u>	To provide clarity on strategic housing delivery numbers across the Places (in response to MIQs)
MM272	5.7 South West	BP7 g)	<u>"Providing a quality, diverse retail offer in Wembley town centre by providing for an additional 4,300sqm of A3 food and drink and A4 pubs/drinking establishments floorspace particularly in secondary shopping frontages to further support an evening economy and support the centre's potential change in status to a metropolitan centre in the London hierarchy.1,800 sqm of additional comparison retail floorspace."</u>	To align floorspace quantum's with those recommended within table 2.1 of the Retail and Leisure Needs study (EB_E_06).
MM305	5.7 South West	BSWGA1	<u>"...In addition to over 6000 6,800 additional homes, Alperton will be encouraged to become an enterprise hub....."</u>	To reflect the updated housing trajectory (In response to MIQs)
MM273	6.2 Housing	BH1	Amend BH1 to <u>"...to provide a minimum 27,482 23,250 homes in the period 2019/20-2028/29. It will positively plan to promote a further minimum 21,595 homes from 2029/30 to the end of the Plan period in 2041 deliver 46,050 homes between 2019/20 and 2040/41....."</u>	To take account of the minimum housing requirement in the draft London Plan and the revised housing trajectory August 2020.
MM274	6.2 Housing	BH9 Gypsy & Traveller Accommodation	<u>"...The council will seek to accommodate the identified needs for any additional pitches in its latest study that is consistent with the most up to date national or adopted London Plan definition of Gypsy and Travellers and associated needs assessment methodology.</u> <u>Within Growth Areas (except South Kilburn) and developments of 1 hectare or more that will include new</u>	To reflect the Secretary of State's directions to remove the definition of Gypsy and Travellers and its associated use for needs assessments as set out in the Intend to Publish London Plan.

			homes, the potential for the incorporation of a dedicated Gypsy and Travellers' site/s should be robustly considered as part of any required masterplanning / site design evolution process. If it is evidenced that a more traditional format of site cannot be incorporated, then more innovative ways of accommodating needs should also be shown to have been considered..."	
MM275	6.4 Town Centres	BE1	<p>"...In Alperton, Burnt Oak Colindale, Church End, Neasden, Staples Corner and Wembley Growth Areas, a minimum of 10% of total floor space within major developments exceeding 3000 sqm is to be affordable <u>research and development, light industrial and studio workspace in the B use class which will be protected by condition and / or legal agreement, where appropriate to do so.</u></p> <p><u>New affordable workspace should normally be provided on-site for the lifetime of the development and managed by an approved provider. Only in exceptional circumstances where it can be demonstrated robustly that this is not appropriate, may it be provided off-site. A financial contribution in lieu of on-site provision will only be accepted where this would have demonstrable benefits in furthering affordable workspace in the borough.</u>"</p>	Takes into account UCO change. It sets out requirements to ensure that affordable workspace meets needs and where provided is retained.
MM276	6.4 Town Centres	BE2	" <u>The Council is committed to exceeding the additional 0.6 hectares equivalent of industrial floorspace need within the plan period. Within SIL and LSIS, as shown on the Borough Policies Map, development will be supported where it intensifies industrial uses and accords with the following principles as follows:</u> "	Clarifies where locations of SIL and LSIS will be in response to MIQ 6.8. Refers to locations of SIL and LSIS on policies map.
MM277	6.4 Town Centres	BE2 bullet 2	" <u>a net increase in <u>employment industrial floorspace resulting in a minimum 0.65 plot ratio or the existing floorspace total, whichever is the greater, across the masterplan area.</u></u> "	Seeks to ensure additional industrial floorspace is provided to support policy aims of increasing supply.

MM278	6.4 Town Centres	BE2 bullet 3	<p>“a mix of <u>research and development B1(b), light industrial B1(e), B2 general industrial and B8 storage and distribution employment</u> floorspace will be delivered reflective of borough needs, including start-up space, move on space;....”</p>	To reflect changes to the UCO
MM253	6.4 Town Centres	BE3 amend previous MM253	<p><u>Local Employment Sites have an important role to play in ensuring that a range of employment premises are available to meet employment needs, including ensuring the need for additional industrial floorspace capacity is met in the borough. The Council will require their retention. Where possible their use for research and development, light industrial, general industrial or storage and distribution will be intensified. The council will only allow the release development of Local Employment Sites for non-employment uses, where:</u></p> <ul style="list-style-type: none"> a) continued wholly employment use is unviable; or b) development increases the amount of <u>workspace, as well as retaining the existing employment use, or provides that additional workspace as affordable studio, research and development, light industrial or general industrial workspace in the B use class, with maker space in light industrial use class B1(e) prioritised to meet demand.</u> <p><u>Where criterion a) is being used to justify the release, the maximum viable replacement of the existing employment floor space will be sought.”</u></p>	Takes account of the importance of Local Employment Sites overall and their role in supporting delivery of additional industrial capacity in the area. Also takes into account of changes in the use classes order.
MM279	6.4 Town Centres	BE3	<p><u>“Where criterion b) applies, if within the existing or emerging creative clusters, of Harlesden, Wembley Growth Area, Willesden Green, Alperton Growth Area, Kilburn, Kensal Green, Neasden, Queen’s Park, Burnt Oak Colindale Growth Area, and Church End Growth Area affordable workspace is to be provided on-site. Elsewhere, if affordable workspace is considered unlikely to be successful, financial contributions will be secured to provide equivalent affordable workspace elsewhere.”</u></p>	To take account of preferred approach to ensuring affordable workspace meets needs and is viable/ retained in the longer term.

MM280	6.4 Town Centres	BE4	"No further A4drinking establishments or A5take-away uses will be permitted..."	Reflect changes to the Use Class Order.
MM281	6.4 Town Centres	BE4	"Non-A1 or A2 uses will be permitted within town centres where: a) they would not reduce the proportion of frontage in A1 and A2 use to less than 65% of the primary frontage; or b) if vacancy rates exceed 10% of primary frontage it would not reduce the proportion of frontage in A1 and A2 use to less than 50%; and c) the proposal provides, or maintains, an active frontage."	No longer of relevance considering changes to the Use Class Order.
MM282	6.4 Town Centres	BE4	"Unviable secondary frontage on the periphery of town centres will be promoted for workspace, social infrastructure and residential uses. <u>Viability will be determined in accordance with the marketing requirements set out in paragraph 6.4.33</u> "	Include reference to supporting text within policy.
MM283	6.4 Town Centres	BE5 a)	" The introduction of any new A5-use <u>takeaway</u> within the designated primary frontage of a town centre;	Reflect changes to the Use Class Order.
MM284	6.4 Town Centres	BE5 b)	" an A5-use <u>takeaway</u> within 400 metres walking distance of a primary school, secondary school or further education establishment entrance/ exit point;"	Reflect changes to the Use Class Order.
MM285	6.4 Town Centres	BE5 c)	" more than 6% of the units within a town centre frontage in A5-uses <u>being takeaways;</u> "	Reflect changes to the Use Class Order.
MM286	6.4 Town Centres	BE5 d)	" more than 1 unit or 15% of the units within a neighbourhood parade, whichever is the greater, in A5-use <u>being takeaways;</u> "	Reflect changes to the Use Class Order.
MM287	6.4 Town Centres	BE5 e)	" less than three non-A5 <u>takeaway</u> units between takeaways; or"	Reflect changes to the Use Class Order.
MM288	6.4 Town Centres	BE6	" Loss of A1, A2, A3E and F.1 uses or launderettes in neighbourhood parades or isolated shop units..."	Reflect changes to the Use Class Order.
MM289	6.5 Heritage and Culture	BHC1 c)	"retain buildings, structures, architectural features, hard landscaping and spaces and archaeological remains, where their loss would cause substantial harm <u>seek to avoid harm in the first instance. Any proposed harm to or loss of a heritage asset (including to its setting) should require clear and convincing justification and can be outweighed by material planning considerations in the form of public benefits but only if these are sufficiently powerful."</u>	To provide a more proportionate approach.

MM290	6.5 Heritage and Culture	BHC1 d)	“sustain <u>or</u> and enhance....”	To be consistent with legislation.
MM291	6.5 Heritage and Culture	BHC1 f)	“where demolition is proposed within a conservation area detailed plans.....”	To apply the policy requirement across all heritage assets.
MM292	6.5 Heritage and Culture	BHC1	Reorder the policy by taking criterion c) and placing it after criterion e)	To allow the policy to read better.
MM293	6.5 Heritage and Culture	BHC4	“Development that preserves or enhances existing night time economy activities or creates new ones that will reinforce the role and significance of each centre in the London hierarchy in an inclusive and accessible way will be supported, whilst that which would undermine it will be refused. Development impacting the night-time economy must preserve or enhance its function in line with the London Plan town centre hierarchy. This must accord with the principles of inclusivity and accessibility as laid out within the Mayor’s Culture and Night-Time Economy SPG.”	Reworded for clarity.
MM294	6.5 Heritage & Culture	BHC5	Amend to “The Council will support <u>recognises the important role that pubs can have in contributing to the borough’s character and their role as community assets.</u> The loss of public houses <u>only where will be resisted unless the following can be adequately demonstrated:....’</u> ”	To have a more positive wording around the role of public houses.
MM295	6.7 Sustainable Infrastructure	BSUI3	Amend to: “Proposals that involve the loss of functional floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be resisted <u>refused.</u> ”	To provide a stronger response to potential development in functional floodplain.
MM296	Transport	BT3	Amend: “Existing sidings <u>and sites adjacent to them or the canal with the potential for rail freight use will be protected</u> where these are adaptable to serve anticipated needs. <u>Development proposals which would conflict with the effective operation of these facilities will not be permitted unless:</u> ”	Response to Aggregate Industries to ensure that the Plan provides more of a positive framework to ensure the retention of existing rail freight sites. Originally proposed in response to

			<ul style="list-style-type: none"> a) <u>appropriate mitigation is provided to ensure it will not place unreasonable restrictions on the effective operation of these facilities; or</u> b) <u>the existing facility can be satisfactorily relocated within the development proposals in terms of operational requirements and environmental criteria;</u> <u>or</u> c) <u>the facility is replaced in an appropriate alternative location."</u> 	<p>representation in Full Council Report February 2020 but missed from the Schedule of Proposed Modifications.</p>
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Minor Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM124	5.5 South	Opportunities	“Improve Stonebridge Park gateway through redevelopment of the Argenta House/Wembley Point and Unisys/Bridge Park sites. Unisys/Bridge Park presents the potential for a comprehensive redevelopment to replace the existing eyesore redundant tall buildings next to the North Circular and provide a scale of enabling development to support provision of a modern leisure centre with swimming pool.”	Add more detail to support site allocations.
MiM125	5.7 South West	5.7.25	“The Sudbury Neighbourhood Plan supports development that results in the strengthening of Vale Farm as a regional centre for sports excellence and that improvements should not result in the loss of green space or open space.”	To reflect policy VF1 Vale Farm of the Sudbury Town Neighbourhood Plan 2015 wording.
MiM126	6.1 Design, BD2, Tall buildings in Brent	6.1.16	“...Within the areas identified there should be variety in heights to add visual interest to the skyline. Whilst there will need to be a progressive stepping down of buildings to the edge of the tall buildings zone, this can be subtle and incorporate variety of building heights, it does not have to be a strictly linear progression....”	To reflect a desire to add variety to the building form in the area to create a more interesting skyline
MiM127	6.2 Housing	6.2.6	“....Using a limit of 33% of gross household incomes to be spent on rent/ mortgages, affordable housing comprises 19,448 homes or 46% of that need....”	To clarify the number of affordable dwellings need identified in the Strategic Housing Market Assessment
MiM128	6.4 Economy and Town Centres	Figure 34	Amend figure to make colour scheme more coherent in respect of the key.	To make figure clear.
MiM129	6.4 Economy & own Centres	Para. 6.4.24	“B4e Light industrial floorspace will be prioritised to meet the identified need for this form of employment space in the borough. Brent’s requirements for affordable workspace as set out in Policy BE1 and supporting	Takes into account change to UCO.

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			paragraph 6.4.12 apply.”	
MiM130	6.4 Economy & Town Centres	Para 6.4.25	<u>For development of Local Employment Sites in areas with</u> in existing or emerging creative clusters, workspace is to be provided on-site. This is <u>These are</u> Harlesden, Wembley Growth Area, Willesden Green, Alperton Growth Area, Kilburn, Kensal Green, Neasden, Queen’s Park, Burnt Oak Colindale Growth Area, and Church End Growth Area. Elsewhere in the borough if there is no demand for workspace financial contributions will be secured to re-provide equivalent employment floorspace elsewhere	Clarifies that the paragraph refers to Local Employment Sites, and places emphasis on the desirability of workspace in site as opposed to off-site contributions.
MiM131	BE4	Para. 6.4.28	“The policy approach will also be applied in assessing permitted development prior approval applications for change of use of existing town centre uses. The proportion of frontage is to be calculated based on the length of the primary frontage in metres in the centre as a whole. A1 uses are shops, A2 uses are financial and professional services, A3 uses are restaurants and cafes, A4 are drinking establishments and A5 are hot food takeaways.”	Justification for section of the policy no longer being taken forward, and Use Classes which no longer exist. Therefore needs to be removed.
MiM132	BE4	Para. 6.4.29	“ The policy outlines the council’s approach to managing primary and secondary shopping areas <u>frontages</u> , town centre boundaries...”	Use correct terminology.
MiM133	BE4	Para. 6.4.32	“Where it is desirable to maintain an active frontage the strong preference will be conversion to workspace in the B1 use class (office, research and development or light industrial compatible with a residential environment) at ground floor with residential above.”	Reflect changes to the Use Class Order.
MiM134	BE5	Para. 6.4.43	“While it is acknowledged that takeaways provide a convenience service to local communities, the retail-based role of town centres must be preserved and so an upper limit of 6% of units in a centre’s frontage being in <u>A5 use takeaways</u> has been set as well as a restriction	Reflect changes to the Use Class Order.

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			on any new A5 uses <u>takeaways</u> within the designated primary frontage of a centre.”	
MiM135	BE5	Para. 6.4.44	“In order to prevent an over-concentration of A5 uses <u>takeaways</u> within the secondary frontage of the borough’s town centres there is a requirement to have no less than three non- A5 uses <u>takeaways</u> between takeaways.”	Reflect changes to the Use Class Order.
MiM136	BE5	Para. 6.4.45	“London Plan Policy E9 places restrictions on development proposals containing A5-hot food takeaway uses. Any new A5 uses <u>takeaway</u> within 400 metres walking distance of an existing or proposed primary or secondary school should be refused.”	Reflect changes to the Use Class Order.
MiM137	BE6	Para. 6.4.47	“In determining applications for planning permission and change of use permitted development prior approvals , development resulting in the loss of local retail and service provision will not be permitted unless there is alternative equivalent provision within 400 metres.”	Permitted Development no longer relevant in this instance.
MiM138	BE9	Justification	Move justification to after policy box.	For structural clarity.
MiM139	BE9	New para. after 6.4.60	“ <u>When assessing criterion a) significant compromise will relate to the number of dwellings proposed by the applicant, against the likely reduction on the indicative capacity of the site allocation. An assessment of significance will be done on a case-by-case basis. In particular, it will take into consideration performance against the 5-year land supply requirement. It will also assess the extent to which visitor accommodation has already been permitted against the London Plan requirement of 2,622 bedrooms by 2040. The Council might consider that if performance against the housing requirement is healthy, that a greater component of the allocation coming forward as hotel, is appropriate, even if this reduces housing delivery below the indicative allocation target.</u> ”	To make the term ‘significantly compromise’ more clearly defined.
MiM141	6.5 Heritage & Culture	6.5.24	“The council will resist significant harm to or loss of <u>in the first instance to designated heritage assets</u> . It will assess	To better reflect the distinction in approach to

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>proposals which would directly or indirectly impact on designated heritage assets in the light of their significance and the degree of harm or loss which would be caused. <u>The presumption will be to refuse permission if the proposals cause harm.</u> Where the harm would be <u>is considered to be</u> less than substantial, it will be weighed against any public benefits of the proposal, including securing optimum viable use of the heritage asset and whether it would enhance or better reveal the <u>its</u> significance of the conservation area. For demolition or alteration to be approved, there will need to be clarity about what will be put in its place within a suitable time frame.</p> <p>It should be noted designation as a Locally Listed Building does not provide further statutory protection <u>where it is not in a conservation area</u> but it draws attention to the special <u>architectural, historic, streetscape and design</u> qualities of the building. <u>Development proposals that affect non-designated heritage assets will be required to demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset. Planning permission may be granted in cases where a proposal could result in harm to or loss of a non-designated heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance. Where it is accepted by the Local Planning Authority that demolition is acceptable, recording of the heritage asset should be undertaken and submitted alongside development proposals. Replacement buildings should draw upon the heritage elements of the previous design that made it significant within a suitable time frame. This may include the special qualities listed above.</u></p>	<p>designated and non-designated heritage assets.</p>

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MiM142	6.6 Green Infrastructure and Natural Environment	BGI1	After the Evidence Base section amend: "OTHER GUIDANCE Biodiversity Metric 2.0. DEFRA/ Natural England Biodiversity net gain. Good Practice Principles for Development. A Practical Guide CIRIA/CIEEM/IEMA"	Support for recognised guidance.
MiM143	6.6 Green Infrastructure and Natural Environment	Evidence Base	Add " <u>Open Space, Sports and Recreation Study 2019</u> "	Include evidence base document
MiM102 (revised, and previously mis-labelled MiM202)	6.7 Sustainable Infrastructure	6.7.35	Additional paragraph <u>6.7.35a</u> to be inserted after words 'subject to periodic review': <u>The Council will only consider the redevelopment of sites in functional floodplain to occur within the already identified site allocations and intensification corridors that have been supported by a Level 2 SFRA and Sequential Test. When applying this policy the guidance in the West London SFRA (2018) specifically Sections 3.11.1 and 3.11.2 must be adhered to, so that it is clear which parts of the site are developable and which areas of the site should remain for flood storage (i.e. functional floodplain). The compatibility of development vulnerability classifications for Flood Zones 3a and 3b as shown in Table 3 of the Planning Practice Guidance will apply. The policy is specific about the improvements that will be sought such as restoring natural function and storage capacity of the floodplain. The Council will also seek to improve the environmental quality of any watercourse on these sites. The high level of flood risk warrants very careful consideration of design, mitigation and overall environmental improvement, taking into account climate change, and early discussions with the Environment Agency are recommended."</u>	To provide clarity on as requested by the Environment Agency.
MiM144	7 Delivery and Monitoring	Figure 39	" BGI4 <u>BGI2</u> "	To correctly identify policy being monitored.

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MiM145	7 Delivery and Monitoring	Figure 39	Policy Targets for BD1, BD2, BE4, BGI2 (incorrectly labelled as BGI4, and proposed above to be amended to BGI2) and BS11: “ None <u>Zero</u> ”	To correctly identify target.
MiM146	7 Delivery and Monitoring	Figure 39	BH11 target: “ No Target ” <u>No net loss of family sized (3+bedroom) accommodation</u> ”	To correctly identify target.
MiM147	7 Delivery and Monitoring	Figure 39	BE1 target: “ None <u>10% of floorspace within major developments exceeding 3000sqm as affordable workspace</u> ”.	To correctly identify target.
MiM148	7 Delivery and Monitoring	Figure 39	Performance Measure for BE2 and BE3 “Net additional employment <u>industrial</u> floorspace provided in SIL, LSIS and LES by <u>intensification or co-location</u> .”	More precise performance measure consistent with policy objectives.
MiM140	Glossary	Addition	<u>Makerspace: Studio or light industrial workspace for creative industries. These businesses create social and economic value through events and places of interest, attracting visitors, enriching lives and highlighting diverse perspectives through the arts.</u>	To add clarity to the term ‘makerspace’ in response to MIQ 6.12.

Modifications to the Policies Map

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 14	6.4 Economy Town Centres	BSSA15	The site is located correctly, on the interactive map. However the red line needs tidying up using trace function as currently it encompasses part of the land in no. 7 Winchelsea Rd.	To remove part of land adjacent from red line.
Map Mod 15	6.4 Economy & Town Centres	BSSA16	The site is correctly located on the interactive map. However it requires refinement, as the allocation red line currently includes the first house of the purely residential terrace.	To remove house adjacent to allocation from red line.

Other modifications to Local Plan supporting documents

Modification number	Supporting Document Name	Chapter / Section Number	Paragraph Number	Modification Proposed	Reason for Modification
OM8	Integrated Impact Assessment	Page 504, Table 25, Stage 1- Screening, under 'Progress Made'	2.4, table 25: HRA process	Add: <u>"At Publication Stage, the policy screening was updated to take into account new policies or amendments to policies."</u>	To account for the intended check and update of the plan in respect of any policy changes, prior to publication.
OM9	Integrated Impact Assessment	Page 504, Table 25, Stage 1, Screening, under 'Progress Made'	2.4, table 25: HRA process	Add: <u>"At Submission Stage, the screening assessment was updated to take into account lower London Plan targets (due to the Intend to Publish London Plan being published in December 2019) and progress being made to the Local Plans identified in Table 31"</u> .	To take into account lower London Plan targets (due to the Intend to Publish London Plan being published in December 2019) and progress being made to the local plans identified in table 31.
OM10	Integrated Impact Assessment	P.504, Table 25, Stage 2, under 'Description of Stage'	2.4, table 25: HRA process	Complete the sentence ending 'an' as follows: <u>an any adverse effects on the integrity of sites which have been identified as having likely significant effects at Stage 1"</u> .	Correction of typo / accidental cut.
OM11	Integrated Impact Assessment	P.505, Table 26	3.3, Methodology for screening assessment.	Stage 2 – Appropriate Assessment of Likely Adverse Effects	Due to an Appropriate Assessment not being required to be undertaken with all tasks that are part of the initial screening exercise.

OM12	Integrated Impact Assessment	p.514, section 5.	5.1, first bullet point.	Amend the figure “1,680” to “1,920” 1680; <u>1920.</u>	To reflect the updated housing need figure in the Brent 2018 SHMA.
OM13	Integrated Impact Assessment	p.525, section 7.	7.1	Amend “three” to “five”. Three; <u>five.</u>	This more accurately represents how many pathways have been identified (although these have been described in three sections).
OM14	Integrated Impact Assessment	p.533, section 8.	8.6	Add: <u>The Inspectors’ Report for the Intend to Publish London Plan confirms that subject to the panel’s recommendations, the draft London Plan meets the requirements of the Conservation and Habitats Species Regulations 2017 and relevant policy and guidance. Additionally, the associated Habitats Regulations Assessment Report 2019 confirms that following amendments to London Plan policy, sufficient protective mechanisms are in place to ensure the growth objectives of the London Plan can be delivered without adverse effect on the integrity of European sites.”</u>	As the Brent Local Plan is required to be in accordance with the London Plan, it is required to confirm that the London Plan meets legal requirements as described.
OM15	Tall Buildings Strategy	P.20	8.10	Incomplete sentence should read: “ Elsewhere proposals if higher than mid-rise should have regard to the significance of the St Joseph Church heritage asset and matters such as <u>daylight to properties in Ecclestone Place.</u> ”	Overcome formatting error and provide full sentence.