



Brent Replacement  
Unitary Development Plan (UDP)  
2000 – 2010

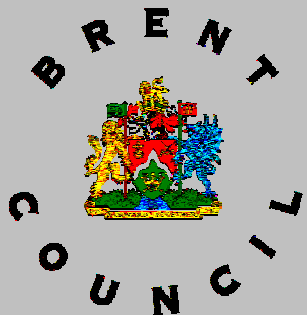
**Proposed Modifications**

**Representations and Council's Response**

(September 2003)

*To the*

**Revised Deposit Version, 2001**



## UDP CHAPTER 2: STRATEGY

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2041	977	Greater London Authority	2.3.11	Yes	Clarification of the date that it is anticipated that the London Plan will be adopted.  Insert after “when this is adopted” “in late 2003”.	Accepted.	Proposed Further Modification
2042	977	Greater London Authority	2.4.2	Yes	GLA Population and Household forecasts 2001-2016 (SDS technical report 5) gives 0.7% annual household growth pa 2001-16 - This would give 14% over 20 years - not 17% as given in this paragraph. GLA figures give 101,500 households in 2001; 112,000 in 2016 (paragraph 2.4.2 gives figures of 100,000 and 117,000 respectively.	The Council recognises that the GLA 2000 Household Projections are likely to give a more accurate population forecast than the 1996 DTLR Household Projections. The Plan will accordingly be further modified to reflect this.	Proposed Further Modification
2013	974	Notting Hill Housing Group	STR1	Yes	This policy has been weakened further from its original text. We would like to see reference to affordable housing remain as a priority. We object to the use of ‘particularly’ also add ‘where it would achieve a mix and diversity of residential development or where it would contribute to meeting an identified housing need’.	Policy STR1, as amended, recognises that new housing development, including, where appropriate, affordable housing provision, will be a priority alternative land use, subject to relevant policy requirements, in areas other than designated Strategic and Borough Employment Areas. The Council does not therefore consider it necessary to further modify this Policy.	No further action
2043	977	Greater London	STR1	No	Change of emphasis acceptable as this still gives positive priority to affordable housing (and 50% target is given indirectly in policy H1A)	Support welcomed.	No further action

## UDP CHAPTER 2: STRATEGY

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
		Authority					
2076	793	GOL- Planning Division	STR2	Yes	<p>This policy in Part 1 of the plan states the Council's policy for the siting of retail and other key town centre uses which attract a lot of people. It sets out the sequential approach that would be applied in considering sites and that first consideration will be given to sites in Major Town Centres and District centres, followed in turn by edge of centre sites, local centres and only then out of centre sites. In line with the Inspector's recommendation, the Council propose deleting the second paragraph of the policy stating that development at out of centre sites should be located where there is very good or good public transport accessibility. PPG6 para 1.11 states that adopting a sequential approach means that first preference should be for town centre sites followed in turn by edge of centre sites, district and local centres and only then out of centre sites in locations accessible by a choice of means of transport. In relation to the hierarchy, however, the appropriate sequence will depend on the scale and nature of the development, with stores of a certain type and up to certain size being more appropriate in district centres, whilst above that size, in the absence of a site in a major town centre, sites on the edge of the major centre would be more appropriate.</p> <p>To meet our objection the policy should be amended to reflect that, in the application of the sequential approach for major development, location on the edge of the major town centre could be the second preference rather than a district centre because of the size and type of development. The policy should also be amended so as to accord with the sequential approach outlined in PPG6 requiring that any out of centre sites be in locations that are accessible by a choice of means of transport. (See also our objection to SH3A / SH3B</p>	<p>Accept in part.</p> <p>Supporting text in paragraph 8.7.2 explains the sequence as sites within Wembley and Kilburn followed by sites on the edge of these centres and then district centres. Reference to locations accessible by a choice of means of transport dealt with in new policy SH3C.</p>	Proposed Further Modification
2044	977	Greater London Authority	STR2	No	<p>The modification is consistent with the sequential approach and the UDP Inspector's Report. The additional explanation within the text and the new policy SH3c mentions the requirement to demonstrate need for the development; the impact on nearby centres and evidence on accessibility by a choice of a means of transport. These are in the draft London Plan, PPG6 and were referred to in the April Parliamentary Statement.</p>	Support welcomed.	No further action
2012	974	Notting	STR4	Yes	The Major Opportunity Sites referred to in this modification should be	Policy STR4 promotes	No further action

## UDP CHAPTER 2: STRATEGY

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
		Hill Housing Group			targeted for affordable housing. The SDS sets out the importance of mixed use development and the contribution which can be made to meeting affordable housing need. The council should view proposals for major sites which include a high proportion of affordable housing favourably and reference to this should be made in the policy.	the use of the designated Major Opportunity Sites for a mix of land-uses, such as housing development, including, affordable housing provision, where appropriate. The Council does not, therefore, consider it necessary to further modify this Policy.	
2014	974	Notting Hill Housing Group	STR20	Yes	We object to the threshold being increased from 10 to 15 dwellings and 0.3ha to 0.5ha. However, we note the sentiment in later policies that lower thresholds will be given further consideration. This is an important aspect of the SDS.	The UDP Public Inquiry Inspector recommended the increase in affordable housing thresholds so as to better accord with Government guidance. The Council therefore considers it would be inappropriate not to accept this recommendation.	No further action
2045	977	Greater London Authority	STR20	Yes	This change is required by the Inspector to conform with Circular 6/98 so no objection. However, Brent should be advised to include here, and in other references to thresholds, a caveat to allow a lower threshold if permitted by (future) government guidance. This is as suggested to other Local Authorities, e.g. Camden, to allow a lower threshold without a UDP review being required should this be allowed by revised government guidance which is overdue but is expected by September 2003. The Local Authority should check exact wording with GOL/ODPM.	The Council does not consider it prudent to make any further alteration to Policy STR20 in anticipation that a possible change in national guidance would enable the application of lower thresholds.	No further action

## UDP CHAPTER 2: STRATEGY

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
1987	973	Quintain Estates and Development PLC	STR27	Yes	In order to properly consider the importance of the Comprehensive Development Area, in terms of the scale and function of uses which can be appropriately located, and reflect the guidance given in the Parliamentary Statement dated 10th April relating to PPG6, it is recommended that Policy STR27 be reworded as follows: “The development of the English National Stadium at Wembley is supported and the regeneration of the Wembley area as a national sporting destination, with supporting large scale, entertainment, leisure and shopping uses, involving major improvements to the environment and infrastructure, is encouraged and promoted.”	The development of large-scale retail uses in particular will have to comply with the sequential approach to development. There is nothing in the Parliamentary Statement which necessitates a change to the wording of this policy.	No further action

## UDP CHAPTER 3: BUILT ENVIRONMENT

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2015	974	Notting Hill Housing Group	BE1	No	We support a high quality of design in new developments and remind the council of the high quality housing provided by RSLs. However, we do not believe that the requirements of this policy should be applied in a way which may delay or prevent much needed affordable housing coming forward.	The intent of design statements is to help speed up decisions by making the design rationale of schemes clearer.	A new SPG on Design Statements has been drafted to explain the process to applicants.
2046	977	Greater London Authority	BE14	Yes	The policy should be amended to include a cross reference to the Mayor's Blue Ribbon network policies as set out in the draft London Plan.	Accepted.	Proposed Further Modification

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
1991	973	Quintain Estates and Development PLC	5.2.3	Yes	The ODPM research undertaken in 1999 and referred to in the text has been superseded and needs to be reflected in the wording of the policies and supporting text.	Accept in Part  The Council considers that the ODPM 1996 Household Projections are still relevant within the context of the England-wide reference in paragraph 5.2.3. However, the Council recognises that the GLA 2000 Household Projections are likely to afford a more accurate forecast for both London and Brent. Hence the Council is proposing a further modification to paragraph 2.4.2 to reflect this.	No further action
1992	973	Quintain Estates and Development PLC	5.2.4	Yes	The ODPM research undertaken in 1999 and referred to in the text has been superseded and needs to be reflected in the wording of the policies and supporting text.	Accept in Part  The Council considers that the ODPM 1996 Household Projections are still relevant within the context of the England-wide reference in paragraph 5.2.3. However, the Council recognises that the GLA 2000 Household Projections are likely to afford a	No further action

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						more accurate forecast for both London and Brent. Hence the Council is proposing a further modification to paragraph 2.4.2 to reflect this.	
1993	973	Quintain Estates and Development PLC	5.2.5	Yes	The ODPM research undertaken in 1999 and referred to in the text has been superseded and needs to be reflected in the wording of the policies and supporting text.	Paragraph 5.2.5, as modified, is based on the GLA 2000 Household Projections and not on the ODPM 1996 Household Projections as this representation claims.	No further action
2016	974	Notting Hill Housing Group	5.2.5	No	We support the introduction of the reference to the need for social rented housing in the borough.	Support welcomed.	No further action
2047	977	Greater London Authority	5.2.5	Yes	Amend last indent to "70% of the additional households will need social rent or intermediate provision" (The reference is to table 3A.2 in the draft London Plan.)	The Council accepts that paragraph 5.2.5 should refer to the wider range of affordable housing need. The Plan will accordingly be further modified to reflect this.	Proposed Further Modification
2017	974	Notting Hill Housing Group	5.3.10	Yes	We note reference in this modification to the draft London Plan, based on estimates of housing capacity. We urge the council to go further than stated by including annual monitoring targets and using indicators to monitor the delivery of affordable housing year on year.	The Council has specifically modified paragraph 5.3.10 to update the previous reference to the strategic planning arrangements for London. It would	No further action



## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						therefore be inappropriate to further amend this paragraph to deal with Borough housing monitoring arrangements.	
2018	974	Notting Hill Housing Group	5.5.2	No	We note reference to the Fordham’s housing Needs Assessment 97/98 and the subsequent re analysis 2002. We welcome reference to the housing needs figures over the next 5 years and over the plan period.	Support welcomed.	No further action
1994	973	Quintain Estates and Development PLC	5.5.2	Yes	The reference to a housing needs survey, carried out in 1997/8 is outdated and such surveys will undoubtedly not comply with the requirements of the Good Practise Guide published in 2000. The Policies and supporting text needs to be based upon a survey which reflect this guidance.	The Council does not accept that its 1998 Housing Survey, re-analysed in 2002 by Fordham, is either so outdated as to not provide a robust policy making foundation, or would not comply with current Government Good Practice. The Council particularly notes that the Inspector did “not consider it necessary to undertake further assessments of housing need” (Inspector’s Report, paragraph 5.27).	No further action
1995	973	Quintain Estates and Development PLC	5.5.2	Yes	The reference to the 2002 Fordham Research Survey is inappropriate in the context that this is not a publicly available document and therefore its findings and methodology cannot be objectively assessed.	The report of the 2002 Fordham Research Survey is available to the public. The Council will favourably consider	No further action

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						making available further data in so far as it does not contravene the Data Protection Act requirements.	
2019	974	Notting Hill Housing Group	H1A	No	We support this modification.	Support welcomed.	No further action
2048	977	Greater London Authority	H1A	No	This is consistent with dLP and sets an indirect 50% Affordable Housing target consistent with dLP.	Support welcomed.	No further action
1996	973	Quintain Estates and Development PLC	5.6.1	No	The reference to live work units being counted towards the provision of housing targets overall, and non self contained dwellings, (shared, student and nursing home accommodation) counting towards the affordable housing component, is supported.	Support welcomed.	No further action
1997	973	Quintain Estates and Development PLC	5.6.3	No	The inclusion of low cost market housing as a contributor to the total provision of affordable housing is supported. Low cost market housing can make a substantial and positive contribution.	Support welcomed.	No further action
2049	977	Greater London Authority	5.6.3	Yes	While this is correct in terms of Circular 6/98, Brent is advised to define in the text or through SPG, low cost market housing in terms of affordability criteria. The Mayor's view is that the criteria should be equivalent to intermediate provision criteria in dLP – i.e. affordable by households on incomes below £35,000 pa at 2002/3 prices.	The Council recognises the desirability of further defining low cost market housing in terms of incomes. The Council considers that Supplementary Planning Guidance, which will be regularly reviewed, is a more appropriate vehicle for this purpose than the Plan.	No further action
2050	977	Greater	5.6.7	Yes	Add the caveat regarding the potential change in government guidance.	The Council does not	Proposed Further

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
		London Authority			<p>As paragraph on thresholds in dLP will be changed (in the light of Panel report), the reference to dLP is best taken out. The text should be clear that the provision of Affordable Housing below the threshold will be by negotiation.</p> <p>The Council will encourage the provision of an element of affordable housing on sites below the 15 units/0.5ha threshold where this is appropriate.</p>	<p>consider it prudent to make any further alteration to Policy H8 in anticipation that a possible change in national guidance would enable the application of lower thresholds.</p> <p>The Council accepts that paragraph 5.6.7 should be further modified to ensure symmetry with Policy H1 as modified.</p> <p>The Council does not consider that the reference to the Draft London Plan is inappropriate as it merely reflects the chronology of the UDP Review.</p>	Modification
2020	974	Notting Hill Housing Group	5.6.7	No	As set out above we object to an increased threshold as set out in our comments in respect of STR20 (above). However we support the sentiment in 5.6.7a that the council will give consideration to a lower or zero threshold approach as set out in the SDS.	Support welcomed.	No further action
1986	972	Laing Homes North London	5.6.7a	Yes	<p>We would like to object to the Council's modifications of paragraph 5.6.7a. The text sets out that the Council will seek the provision of affordable housing below the "Inner London" threshold and will have regard to the Draft London Plan.</p> <p>In response to this, the London Plan is still in its draft format. As such,</p>	The Council considers that its general intent to seek to negotiate an element of affordable housing provision on suitable sites which are	No further action

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>UDPs should have regard to Government guidance as set out in Circular 06/98. Paragraph 10 of the Circular advises that in assessing the suitability of sites for affordable housing in Inner London locations, housing developments of 15 or more dwellings, or residential sites of 0.5 of a hectare or more should be considered.</p> <p>The Circular therefore clearly sets out affordable housing thresholds and UDP policy should reflect Government guidance.</p>	<p>below the ‘inner London’ threshold is justified by acute local housing need. The Council notes that it is statutorily required to ensure that its Plan is in general conformity with the Mayor’s Plan. The Council further notes that the Panel Report of the Examination in Public of the Draft London Plan has supported this Mayoral proposal.</p>	
2039	727	BT Plc	5.6.7a	Yes	<p>The paragraph has not been included to reflect the comments of the Inspector, it is solely the Council’s response to the draft London Plan which has not yet been approved.</p> <p>BT object on the grounds that the paragraph wholly contradicts the thresholds that have been recommended by the Inspector and accepted by the Council. Whilst these thresholds are recommended in C6/98 for “Inner London Boroughs”, of which Brent is not one, the Inspector has accepted that due to the characteristics of Brent this figure should apply.</p> <p>However, the inclusion of the proposed paragraph would contradict the accepted threshold, create uncertainty and has no formal policy backing. It is for this reason that BT request that Paragraph 5.6.7a be deleted.</p>	<p>The Council considers that its general intent to seek to negotiate an element of affordable housing provision on suitable sites which are below the ‘inner London’ threshold is justified by acute local housing need. The Council notes that it is statutorily required to ensure that its Plan is in general conformity with the Mayor’s Plan. The Council further notes that the Panel Report of the Examination in Public</p>	No further action

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						of the Draft London Plan has supported this Mayoral proposal.	
2021	974	Notting Hill Housing Group	H1	No	We support the modifications to this policy.	Support welcomed.	No further action
2081	674	Sainsbury's Supermarkets Ltd	H1	Yes	<p>The proposed new text advises that the Council will encourage the provision of affordable housing on suitable sites below the threshold set out in this Policy.</p> <p>There is no indication on what type of sites may be considered as suitable and as such the policy fails to give the sufficient guidance.</p> <p>In the absence of any clear guidance on the type of suitable sites that this part of the policy will cater for we suggest that this part of the policy be deleted.</p>	The Council does not accept that this Policy, as proposed for modification, provides insufficient guidance. The Council notes that this Policy reflects a general encouragement of affordable housing provision on sites below the specified threshold. The Council considers it would be inappropriate to detail the wide range of criteria by which a site may be considered potentially suitable for seeking to negotiate an element of affordable housing.	No further action
1998	973	Quintain Estates and Development PLC	Definition of Affordable Housing	Yes	While the first sentence of this paragraph is supported and considered helpful, the second sentence is considered overly prescriptive and unnecessary in the context of the guidance provided in the first sentence. It is recommended that the second sentence be deleted.	The Council does not accept that the second sentence of the Affordable Housing definition is "overly prescriptive and	No further action

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						unnecessary". The Council considers that it is both reasonable and helpful to incorporate comparative 'benchmarking' criteria into this definition.	
2051	977	Greater London Authority	5.6.14	No	Key issue is affordability not subsidy so original text using "affordable" is preferable. The Plan Inspector is probably correct however to require "unable" to be replaced by "unlikely". The Mayor is intending to remove reference to subsidy in dLP definition.	Support welcomed.	No further action
1999	973	Quintain Estates and Development PLC	5.6.14	No	The ability of low cost discounted general market new build housing to meet the affordability criteria of those in housing need depends upon the level of discount and the level of income of those in housing need. In this context, it is considered that the replacement of the word 'unable' for 'unlikely' is appropriate.	Support welcomed.	No further action
2022	974	Notting Hill Housing Group	H2	Yes	We do not support the inclusion of point (g) ..... We believe that this will only serve to reduce opportunities for affordable housing. The existing criteria achieve the objective of this policy.	The UDP Public Inquiry Inspector recommended that this Policy should specifically recognise the wide range of physical and social infrastructural facilities that might be needed to make a housing development sustainable and whose provision might therefore impinge on the viability of a higher level of affordable housing. The Council therefore considers it	No further action

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						would be inappropriate not to accept this recommendation.	
2023	974	Notting Hill Housing Group	H3	No	We support deletion of this policy. The policy did not make a positive contribution to the objectives of the plan.	Support welcomed.	No further action
2025	974	Notting Hill Housing Group	5.6.22a	No	We support reference to key workers in this modification. However we urge the council to undertake an extensive study of key workers in the borough to justify the proportion of key worker housing as part of the affordable housing target. We would be pleased to assist with this exercise.	Support welcomed.	No further action
2024	974	Notting Hill Housing Group	H4	No	<p>We note that the council has deleted all the text with regard to payments and calculations of payments. We support this in principle, but reinforce the importance of providing extensive guidance to developers. We would urge the council to provide us with information on how this will be undertaken and would welcome the opportunity to contribute to any SPG on affordable housing.</p> <p>We support the priority of providing of affordable housing ‘in-situ’, but urge the council to ensure that any exceptional circumstances are fully justified by developers and that any contribution fully represents the benefits of not providing housing on site.</p>	Support welcomed.	No further action
2026	974	Notting Hill Housing Group	5.7.5	Yes	The South Kilburn master plan will provide significant development opportunities for Brent. We urge the council to make reference to the importance of providing much needed affordable housing as part of this master plan.	Improving existing affordable housing provision is a key objective of the South Kilburn Master Plan. The Council does not consider it would be appropriate to further elaborate in the UDP the details of the South Kilburn Master Plan which will be the subject of specific	No further action

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						Supplementary Planning Guidance.	
2027	974	Notting Hill Housing Group	H8	Yes	We again express our concern over the raising of thresholds.	The UDP Public Inquiry Inspector recommended the increase in affordable housing thresholds so as to better accord with Government guidance. The Council therefore considers it would be inappropriate not to accept this recommendation.	No further action
2052	977	Greater London Authority	H8	Yes	Acceptable with the caveat regarding a lower threshold if permitted by Government guidance.	The Council does not consider it prudent to make any further alteration to Policy H8 in anticipation that a possible change in national guidance would enable the application of lower thresholds.	No further action.
2029	974	Notting Hill Housing Group	5.10.4	Yes	We support much of the sentiment which has been expressed in this modification, particularly reference to sites coming forward. However, we remind the council of the negative impacts which may result from applying a rigid sequential approach. We would wish to see a sentence in the justification which recognises that where a significant amount of affordable housing can be released, sites will be taken out of sequence.	The Council considers that this requested modification would be contrary to both the Inspector's recommendation and the Government's interpretation of the application of the sequential approach to new housing	No further action



## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						development.	
2030	974	Notting Hill Housing Group	5.10.4	Yes	<p>We support reference to monitoring of housing, and presume this includes affordable housing, but urge the council to set out in the plan (or appendix) the indicators which it intends monitoring against. We provide a list as follows.</p> <p>The number of affordable units granted permission per annum broken down by type (social rented, shared ownership, low cost ownership);</p> <p>The number of affordable units completed per annum broken down by type;</p> <p>The proportion of the above provided on S.106 sites (and therefore the remaining proportion provided as 100% affordable housing schemes);</p> <p>The number provided as ‘off site’ units;</p> <p>The amount of cash in lieu received per annum;</p> <p>The amount of cash spent per annum and the number of resulting additional units provided;</p> <p>The number of affordable units approved and constructed indicating whether or not Social Housing Grant/ Local Authority Social Housing Grant was included;</p> <p>An assessment as to whether the affordable housing target set in the local plan being met (i.e. comparison with overall housing completion rate);</p> <p>The number of empty homes brought back into use per annum, broken down by type;</p>	The Council considers the proposed monitoring indicators represent a level of detail inappropriate for inclusion in the Plan. However, the Council intends to provide much of the requested information in its proposed annual Housing Development Monitoring document.	No further action
2031	974	Notting Hill Housing Group	5.10.4a	Yes	Please add after ‘met’...’or the development of the site will enable the provision of a significant amount of affordable housing’.	The Council considers that this requested modification would be contrary to the Inspector’s recommendation, the Government’s interpretation of the application of the sequential approach to new housing	No further action

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						development and its guidance on meeting strategic housing targets.	
2079	793	GOL- Planning Division	5.10.4a	Yes	<p>These paragraphs state that the plan contains greenfield sites allocated for housing. Para 5.10.4a, providing reasoned justification text for policy H10 relating to housing on brownfield sites, refers to the fact that "very few greenfield sites are allocated for housing in the Plan, contributing a very small proportion of the housing requirement over the Plan period". The justification text accompanying policy OS22 on allotments states that the "Council does not currently rely on Greenfield sites other than those identified in the Plan to meet its housing requirements." PPG3 states that in identifying sites to be allocated for housing in plans, local authorities should follow a search sequence with the presumption that previously developed sites should be developed before greenfield sites. The plan review process should therefore include a review of existing greenfield sites already allocated to check if they are still needed and acceptable in PPG3 policy terms.</p> <p>Our objection would be met if, in identifying in the plan proposals relating to sites currently considered to be greenfield ones and having regard to the advice in paras 30 and 31 of PPG3, confirmation was provided that a review of the allocation of these sites has been undertaken establishing that they are still required for housing.</p>	The Plan has designated 44 sites for housing development purposes, of which only 2 could be construed as ‘green field sites’, as defined by PPG 12. Both of these sites comprise disused allotments which the Council has determined as surplus to Borough resident’s requirements, a position recognised by the UDP Public Inquiry Inspector. The Council considers that these sites are of a size and so located as to be particularly suitable for family sized dwellings, especially for affordable housing, for which there is a pressing need as many of the other designated housing sites would not afford a child-friendly environment.	No further action
2028	974	Notting	H11	No	We support the deletion of this policy.	Support welcomed	No further action

## UDP CHAPTER 5: HOUSING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
		Hill Housing Group					
2032	974	Notting Hill Housing Group	H13	No	We support deletion of this policy within the proposed modifications.	Support welcomed	No further action

## UDP CHAPTER 6: TRANSPORT

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2005	965	Wm Morrison Supermarkets plc	6.10.6	No	Wm Morrison supermarkets plc support the changes to paragraph 6.10.6. They consider that the changes are helpful and will allow parking provision to take into account advice in ppg13 and the strategic guidance for London.	Support welcomed	No further action
2054	977	Greater London Authority	6.10.6	Yes	Clarification of strategic guidance for London  Insert after "in strategic guidance for London" "as set out in the London Plan"	Accept	Proposed Further Modification
2006	965	Wm Morrison Supermarkets plc	TRN22	Yes	Wm Morrison supermarkets plc object to draft policy trn22. In particular, they object to the final sentence of the policy which sets out the circumstances where the application of parking standards may be varied.  The objectors consider that the sentence should be amended to provide more flexibility and allow the particular needs/requirements of the proposed development to be taken into consideration.  Wm Morrison supermarkets plc suggest, therefore, that the final sentence of draft policy trn22 should be amended, to read as follows:  "... the application of these standards may be varied depending on the level of public transport accessibility to the site, the particular needs/requirements of the proposed development, and the contribution that the development would make in reducing the number and length of motorised journeys."	As the parking standards specify different maximum levels of provision for different uses then it is unnecessary to vary the application of the standards further, depending upon the requirements of the proposed development. The standards already allow for variations below the maximum.	No further action
2033	974	Notting Hill Housing Group	TRN22	Yes	We support the application of maximum parking standards as set out in this modification. However, we urge the council include in the subtext that the car ownerships needs of RSL and specifically those on the housing register will be considered.	The Plan already accepts that a reduced level of parking may be appropriate for social housing schemes. In moving to maximum standards it is unnecessary.	No further action
2053	977	Greater London Authority	TRN22	Yes	Clarification  It would be preferable if the second sentence read:	It is considered that the insertion of the additional words	No further action

## UDP CHAPTER 6: TRANSPORT

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					“The application of these standards may be varied depending on the level of current or projected public transport accessibility to the site and the contribution that the development would make to reducing the use of the private car.”	provides an unnecessary level of detail.	
2000	973	Quintain Estates and Development PLC	TRN28	Yes	In order to maintain a flexible approach, it is considered that the following sentence should be inserted at the end of the proposed additional text in the modifications: “However, this should not act to constrain the scope for the application of charges to resident parking schemes designed to manage parking space and encourage the use of more sustainable modes of transport. Access to such schemes would be controlled to residents of the development and their legitimate visitors.”	It is not considered that this is relevant to public off street car parking.	No further action
1985	979	Councillor Paul Lorber	PS14	Yes	In my view, far too much emphasis is being placed on 'national' guidelines and very little on local circumstances.  The Wembley and Sudbury area has: 1. Narrow and congested streets. 2. A poor public transport system - with inadequate service to local hospitals, and unreliable and expensive Underground and Main Line train services. The Chiltern Line service from Sudbury Hill and Sudbury & Harrow Road is abysmal. 3. Poor shopping facilities, with no major department / Chain stores - requiring residents to travel to Brent Cross, Harrow or Ealing.  In view of the above, the car parking standards being imposed are unrealistic and damaging to building sustainable communities.  Inadequate parking is being provided by new developments, as a result of which the burden of 'parking shift' is damaging the amenity for other existing residents.  I therefore object to the restrictive and unrealistic standards being imposed, and request a detailed review of local circumstances so sensible parking standards can be established which take account of local circumstances	The modification related to the Inspector’s recommendation that, in accordance with Government Guidance, the Council should apply maximum parking standards rather than minimum standards. Although car ownership is increasing, in Brent there remains a significant proportion of households without access to a car (37%, Census 2001). It is considered that to allow for unfettered demand for parking	No further action

## UDP CHAPTER 6: TRANSPORT

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>and the reality of rising car ownership.</p> <p>Account also needs to be taken that the redevelopment of the National Stadium with limited parking, and the future redevelopment of Wembley, will place an additional burden on surrounding areas - especially during the long re-development period.</p> <p>Please advise how my objection will be dealt with.</p>	<p>will result in unacceptable environmental conditions and unsustainable development with too much land, which is in short supply, being given over to the motor car. The revised standard allows for 2 spaces to be provided for 4 bedroom units and a minimum of 1 space per unit. This accords with the general standards proposed in the London Plan, to which Brent's UDP must be in general conformity. Wembley is identified as benefiting from very good public transport access. Sudbury town has good access according to the accessibility index based on TfL indices. The recent introduction, and proposed extension, of CPZs in the Borough, and in Sudbury in</p>	

## UDP CHAPTER 6: TRANSPORT

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						particular, should help minimise problems caused by 'parking shift'.	
2055	977	Greater London Authority	PS14	Yes	The parking standards have been modified to read "a reduced provision of 0.7 (from 0.5) spaces per unit applies for 1-2 bedroom units and 1.2 (from 1) spaces per unit for 3+ bedrooms. These standards are thus not reduced but are actually increased from their predecessors and therefore the changes ought to be removed.	The standards are lower than those that apply to across the Borough generally and can be described as a "reduced provision". The figures have been revised to reflect the change to a maximum standard which, prior to the change, was 20% above the minimum.	No further action
2034	974	Notting Hill Housing Group	PS14	Yes	We broadly support the amendments to the parking standards both assigned and unassigned. However, we urge the council to include in the subtext an RSI standard which reflects needs.	Given the acceptance by the Council of the lower need for parking provision in development for an RSL and its reflection in a reduced provision, no further change necessary.	No further action

## UDP CHAPTER 7: EMPLOYMENT

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2035	974	Notting Hill Housing Group		Yes	General note on employment section we urge the council to give consideration to application of an exceptions policy similar to that adopted by the London Borough of Hammersmith and Fulham. That is a policy which ‘exceptionally’ allows affordable housing on employment sites outside the main employment zones.	The Council has accepted the Inspector’s recommendation that the paragraph on exceptions for affordable housing in EMP9 of the Revised Deposit Plan be deleted.	No further action  The Council will, as recommended by the Inspector, consider the appropriateness of making exceptions on a case by case basis, on the merits of a particular site and/or scheme.
2056	977	Greater London Authority	EMP8	Yes	On the range of uses. The GLA’s Draft Industrial Capacity SPG identifies Preferred Industrial Locations (PILs) as normally suitable for B1, B2 and B8 and other uses of an industrial nature although they are not normally suitable for large scale B1(a). Industrial Business Parks are usually suitable for B1(b), B1(c) and high value added B2. B1(a) development should not jeopardise the provision of B1(b) and B1(c) where there is demand. On flexibility, the last paragraph is not entirely consistent with the GLA draft SPG which seeks potential for consolidation on Strategic Employment Locations and mix of uses in locations with good public transport access near to town centres where this does not result in a loss of industrial employment capacity.	The intent of this Policy is to safeguard the Strategic and Borough Employment Areas for employment uses. Other uses will be considered on the basis of the relevant locational policies in the Plan.	No further action
2067	773	Dalton Warner Davis	EMP8	Yes	The policy is unnecessarily restrictive and will stifle employment initiatives because of its inflexibility. The examples given in (d) are unhelpful and should be deleted.  Amend policy as follows: (d) delete "industrial estates" and replace with "employment estates" delete "(such as haulage yards, bus garages and MOT testing stations)"  Delete: "Proposals for other uses, or for the expansion of existing uses not falling within the above categories, will not be permitted where they would result in a loss of land in employment use."	The intent of this Policy is to safeguard the Strategic and Borough Employment Areas for employment uses.  The use of the term ‘industrial estates’ makes it clear it applies to uses closely related with industry.	No further action



## UDP CHAPTER 7: EMPLOYMENT

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2004	965	Wm Morrison Supermarkets plc	EMP9	Yes	<p>Wm Morrison supermarkets plc object to draft policy emp9. In particular, they object to the new sentence at the end of part [i] of the policy, which restricts the scale of development proposals on sites adjacent to district centres to that which is appropriate to the existing scale and function of the centre.</p> <p>They consider that this sentence, as currently worded, is unnecessarily restrictive, and inconsistent with advice in ppg6, which directs proposals for retailing and other key town centre uses to town centre locations, and encourages local planning authorities (at para 1.5) to recognise that the role and function of centres may change over time.</p> <p>The objectors consider that if a need for development is identified, which cannot be accommodated on more sequentially preferable sites, then it would be appropriate to encourage such development at sites on the edge of district centres. The scale of development proposed should be designed to meet identified needs in the locality, rather than restricted in scale to the existing role and function of the centre within which it is located.</p> <p>They consider that this sentence, as currently worded, may prevent retail development for which there is an identified need in coming forward on sequentially preferable sites.</p> <p>Wm Morrison supermarkets plc suggest, therefore, that the final sentence of part [i] of draft policy emp9 should be amended to read as follows:</p> <p>“development proposals on sites adjacent to district centres should be designed to meet identified needs in the locality.”</p>	<p>The Government’s clarification of town centre retailing policies (April 2003) made it clear that:</p> <p>“In applying the sequential approach, the relevant centres in which to search for sites will depend on the nature and scale of the proposed development and the catchment that the development seeks to serve, as set out in the Caborn statement. The scale of such proposals should also be appropriately related to the centre and catchment that the development seeks to serve. The First Secretary of State therefore wishes to make it clear that development that would serve a wide catchment should be located in a centre that serves a similar catchment area”.</p>	No further action.
2074	793	GOL-	EMP15a	Yes	Policy EMP15a relates to the location of B1 business developments. Policy	Policy EMP15a in the	Proposed Further

## UDP CHAPTER 7: EMPLOYMENT

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
		Planning Division			<p>EMP16 in respect of major purpose-built offices, appears identical to the first paragraph of part I of policy EMP15a. These policies state that major commercial and public office developments attracting a lot of people will be directed to the National Stadium Policy Area and the Park Royal Gateways. We originally objected on the basis that, as currently worded, the policies and supporting text; do not comply with the sequential test as set out in PPG6, which applies to office development as well as retail development (para. 1.15). It is noted that the Inspector in her report did not recommend that any modification be made to these policies.</p> <p>We remain concerned that these policies do not comply with the sequential approach outlined in PPG6. Our objection would be met if the policies were to explain that proposals for commercial and public offices that attract a lot of people in the National Stadium Policy Area and the Park Royal Gateways, would be considered in accordance with the Council's policies for the sequential approach to major development. (See also our objection to SH3A / SH3B)</p>	<p>Revised Deposit Plan replaced policies EMP15, EMP16 &amp; EMP17 of the First Deposit Plan. So EMP16 should have been shown as being deleted, but was not, due to a printing error in the Revised version.</p> <p>Partially accepted. The Policy attempts to balance tensions between the major employment uses appropriate to the designated strategic employment areas, (esp. Wembley and Park Royal, which are established office locations), the need to direct major offices to town centres, and the capacity of the town and district centres to accommodate them in addition to all the other uses being directed to them by the sequential approach.</p>	Modification

## UDP CHAPTER 8: TOWN CENTRES AND SHOPPING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2008	965	Wm Morrison Supermarkets plc	8.7.2	No	Wm Morrison supermarkets plc support the changes to paragraph 8.7.2. They consider that the changes will assist developers and operators in preparing appropriate information to accompany planning applications.	Support welcomed	No further action
2059	977	Greater London Authority	8.7.2	No	Deals with retail need and although the Secretary of State recognises the different components of need he/she will place greater weight on quantitative according to the April 2003 Parliamentary statement. The UDP paragraph is not in any conflict here with the Draft London Plan or PPG6.	Support welcomed	No further action
2060	977	Greater London Authority	8.7.3a	Yes	Deals with retail warehouses, warehouse clubs and drive-throughs which are not specifically dealt with in the DLP but there are policies which will apply to them. Policies in the DLP and guidance in PPG6 must be followed and the April 2003 Parliamentary statement states that developments involved in sale of bulky goods are not exempt from the policy tests in PPG6 and the Mayor will argue likewise that they are not exempt from policies in the DLP.	The proposed new paragraph 8.7.3a explains the reasons for applying conditions to bulky goods retail warehouses.	No further action
2061	977	Greater London Authority	8.7.3b	No	This paragraph on warehouse clubs also applies the tests for retail uses and also for employment uses to safeguard employment land.	Support welcomed	No further action
2062	977	Greater London Authority	8.7.3c	No	Reflects the concern that these uses encourage car use and the paragraph encourages location in existing centres and promoting vitality and viability which are consistent with the DLP principles.	Support welcomed	No further action
2082	674	Sainsbury's Supermarkets Ltd	SH3	Yes	<p>The second part of this policy requires retail proposals (and other key town centre uses) on edge of major town or district centres to fulfil the test of need and the sequential assessment in all cases.</p> <p>The wording of the second part of this policy fails to allow for such edge-of-centre sites that may be allocated for retail development during the lifetime of the development plan. As such we consider that this amendment conflicts with PPG6, as clarified by Richard Caborn in his February 1999 speech when he advised,</p> <p>" proposals which would be located at an edge-of-centre or out-of-centre location and which:</p> <p>are not in accordance with an up-to-date development plan strategy; or</p>	This is a general policy which deals with proposals which may come forward for unallocated sites. Other sites which may come forward 'during the lifetime of the Plan' will not be 'allocated' until a review of the Plan is undertaken and will therefore be subject to the general policy.	No further action

## UDP CHAPTER 8: TOWN CENTRES AND SHOPPING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>are in accordance with the development plan but that plan is out of date, is inconsistent with national planning policy guidance, or otherwise fails to establish adequately the need for new retail and leisure development to which PPG6 applies,</p> <p>should be required to demonstrate both the need for additional facilities and that a sequential approach has been applied in selecting the location or the site."</p> <p>We therefore suggest that this part of the policy be amended to take into account the fact that allocated sites are not required to fulfil the requirements listed.</p>		
2009	965	Wm Morrison Supermarkets plc	SH3A	Yes	<p>Objection to new policy SH3a</p> <p>Wm Morrison supermarkets plc object to new policy sh3a. In particular, they object to criterion (a).</p> <p>They consider that this criterion, as currently worded, is unnecessarily restrictive, and inconsistent with advice in ppg6, which directs proposals for retailing and other key town centre uses to town centre locations, and encourages local planning authorities (at para 1.5) to recognise that the role and function of centres may change over time.</p> <p>The objectors consider that proposed retail development in major town centres and district centres should be designed to meet identified needs in the locality, rather than restricted in scale to the existing role and function of the centre within which it is located.</p> <p>They consider that this criterion, as currently worded, may prevent retail development for which there is an identified need in coming forward on sequentially preferable sites.</p> <p>WM Morrison supermarkets PLC suggest, therefore, that criterion (a) of draft policy SH3A, should be amended to read as follows:</p>	PPG6 1.13 and the Ministerial clarification of February 1999 state that development should be appropriate in scale and function.	No further action

## UDP CHAPTER 8: TOWN CENTRES AND SHOPPING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					(a) The proposal takes into account the nature of its surroundings and any potential need for the development.		
2057	977	Greater London Authority	SH3A	Yes	Does not include reference to the site's accessibility to a choice of means of transport as reflected in PPG6 and in the recent April 2003 Parliamentary statement (this refers to edge of centre sites as well as out of centre).	Accepted	Proposed Further Modification
2077 and 2078	793	GOL-Planning Division	SH3A and SH3B	Yes	<p>As currently drafted policies SH3A and SH3B do not in two respects fully accord with the sequential approach outlined in PPG6 and subsequent Ministerial and Parliamentary Statements. Firstly, notwithstanding the introduction of criteria a) that proposals should be consistent with the scale and function of the centre within which it is located and with the catchment that it serves, by brigading together major town centres and district centres in one policy the application of the intended sequential approach is unclear. PPG6 para 1.11 states that adopting a sequential approach means that first preference should be for town sites followed in turn by edge of centre sites, district and local centres and only then out of centres sites in locations accessible by a choice of means of transport. In practice, however, the appropriate sequence will depend on the scale and nature of the development, with stores of a certain type and up to certain size being more appropriate in district centres, whilst above that size, in the absence of a site in a major town centre, sites on the edge of the major centre would be more appropriate. This could be handled, as some Boroughs have done, by indicating the maximum size of stores appropriate in local and district centres.</p> <p>Secondly, the introduction of criteria b) stating that proposals located within major town centres and district centres should "not to have an unacceptable impact on the vitality and viability of other town or district centres" exceeds the requirements of PPG6. This would only arise if an in-centre development was excessive in size. This could be handled by specifying the maximum size of developments in district centres. However, in terms of Policy SH3A, this is covered by part (a) of the policy and part (b) is therefore otiose.</p> <p>To meet our objection the policies should be amended:</p>	Accept in part. Criterion (b) as indicated should not apply within town centres therefore it is proposed to move this as criterion (iii) to edge of centre developments only. It is not accepted that maximum size thresholds should be introduced for local or district centres as this is a matter of judgement when details of a proposal are known. Supporting paragraph 8.7.2 indicates that edge of major centres (i.e. Wembley and Kilburn) is sequentially preferable to District Centres.	Proposed Further Modification

## UDP CHAPTER 8: TOWN CENTRES AND SHOPPING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>to reflect that in the application of the sequential approach for major development, location on the edge of a major town centre could be the second preference rather than a district centre because of the size and type of development; and</p> <p>criteria b) should be deleted from policy SH3A.</p> <p>(See also our objections to STR2 and EMP15a / EMP16)</p>		
2083	674	Sainsbury's Supermarkets Ltd	SH3B	Yes	<p>This policy requires the test of need to be met and the sequential assessment of larger retail schemes or other facilities on sites within local centres. There is no indication in either PPG6 or the subsequent clarification provided by Caborn in February 1999 and the OPDM in April 2003 that local centres should be treated differently to other centres.</p> <p>In the recent case of Wandsworth Borough Council v SOSTLR ex parte Tesco Stores Ltd, 2002 the Courts considered whether a local centre constituted a centre for the purposes of PPG6 (including the Caborn statement of February 1999) and as such whether proposals within a local centre were exempt for the requirement to demonstrate need and the sequential assessment.</p> <p>The Courts held that:</p> <p>"...There is nothing in the [Caborn] statement to suggest that the words "existing centre" are confined to any particular form of centre.</p> <p>PPG6 does not exclude local centres from being town centres in such circumstances. Since both PPG6 and RPG3 support the protection of "local or neighbourhood" centres, and indicate that such centres can and should be the focus for appropriate retail development, there is nothing illogical or unreasonable in concluding that a "neighbourhood or local" centre is an "existing centre".</p> <p>The Caborn statement refers only to "existing centres", and the words are</p>	PPG6 (paragraph 1.11) clearly sets out a sequential approach which means that first preference should be for town centre sites followed in turn by edge of centre, district and local centres. A separate policy SH3B for local centres clarifies the position within the sequential approach.	No further action

## UDP CHAPTER 8: TOWN CENTRES AND SHOPPING

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>plainly capable of encompassing a "neighbouring or local centre." This is supported by Annex A to PPG6, which includes under the heading "Types of Centre" : local centres, district shopping centres, and town centres (which is expressed to cover city, town and traditional suburban centres). "</p> <p>We therefore suggest that policy SH3B be deleted and the reference to local centres be included within policy SH3A, which already includes the reference to scale at criterion a).</p>		
2058	977	Greater London Authority	SH3C	No	Does include the four tests and is consistent with PPG6 and the April 2003 Parliamentary statement.	Support welcomed	No further action
2036	974	Notting Hill Housing Group	SH17	No	We support the modifications to this policy.	Support welcomed	No further action
2007	965	Wm Morrison Supermarkets plc	SH26	No	Wm Morrison supermarkets plc support the changes to draft policy sh26 which now "welcome" (rather than require) the provision of facilities for childcare in retail developments with a gross floorspace of 2,000 sq.m. or more. They consider that this change provides an appropriate element of flexibility to the policy and will allow an appropriate range of facilities to be provided at such developments, if necessary.	Support welcomed	No further action

## UDP CHAPTER 10: OPEN SPACE AND RECREATION

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2037	974	Notting Hill Housing Group	10.3.4	Yes	Whilst we acknowledge the requirements of PPG17 we remind the council that its policies must be based on a robust assessment of open space. We urge the council to include a reference which states that where open space does not have an identified use or value to the local community it should first be considered for the development of permanently available affordable housing.	The Council has modified paragraph 10.3.4 specifically to update the reference to the relevant Government planning guidance. The Council therefore considers it would be inappropriate to further amend this paragraph as requested. The Council further notes that although housing development, including affordable housing provision where appropriate, is likely to be a priority alternative land use in the event of open space being deemed surplus to requirements (in accordance with PPG17 procedures), there may be circumstances where a housing use would be contrary to the relevant local land use strategy and planning policies.	No further action
2072	978	Copland Community School and Technology	10.3.4	No	We welcome the revisions to paragraph 10.3.4 which seek to update the plan in accordance with recent national planning policy guidance contained within Planning Policy Guidance Note 17 Planning for Open Space, Sport and Recreation which was published subsequent to the UDP Public Inquiry.	Support welcomed	No further action



## UDP CHAPTER 10: OPEN SPACE AND RECREATION

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
		Centre Foundation					
2073	793	GOL- Planning Division	OS20A	Yes	<p>In her report the Inspector recommended at paragraph 10.47 that the second sentence of policy OS20 be deleted to form the basis of a new policy which promotes development on sites specifically referred to, suitably cross-referenced to the proposals chapter in the plan. The Inspector also recommended that the reasoned justification to this new policy should explain how these proposals accord with the strategy for sports provision and the steps taken by the Council to ensure that the sequential test has been met. In the modifications the Council propose including an additional policy referring to the site specific proposals already in the plan and in addition state that proposals will be brought forward for the re-provision of Willesden Sports Centre and Athletics Stadium. The policy states that these proposals require extensive site areas and that in each case there are no sequentially preferable locations and that the proposals are included in the plan on that basis.</p> <p>Our objection would be met if, in line with the Inspector's recommendation, reasoned justification was added to the policy amplifying para 10.11.17a explaining how these proposals accord with the strategy for sports provision and the steps taken by the Council to ensure that the sequential test has been met. Reference to proposals for the re-provision of Willesden Sports Centre and Athletics Stadium should be deleted from the policy as it appears premature to conclude that there are no sequentially preferable locations in advance of the inclusion of a site-specific proposal in the plan.</p>	The Council recognises that the proposed addition of new Policy OS20a requires a complementary elaboration of paragraph 10.11.17b (formerly 10.11.17a) to specifically refer to the Council's sports strategy 'A Sport and Leisure Development Framework For Brent (2003). The Council does not consider that it has failed to properly employ a sequential approach to evaluate the proposed re-provision of the Willesden Sports Centre and Athletics Stadium. In this context, the Council specifically notes the UDP Public Inquiry Inspector's recognition "I am satisfied that the Council has properly considered whether the site-specific proposals it is	Proposed Further Modification

## UDP CHAPTER 10: OPEN SPACE AND RECREATION

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						promoting comply with the sequential approach to site selection” (Inspector’s Report, para 10.45). The Council’s further notes that the proposed re-provision of the Willesden Sport Centre will be of considerable benefit to the adjacent Willesden City Academy, whose curriculum will prioritise sports.	
2080	793	GOL- Planning Division	10.13.2	Yes	<p>These paragraphs state that the plan contains greenfield sites allocated for housing. Para 5.10.4a, providing reasoned justification text for policy H10 relating to housing on brownfield sites, refers to the fact that "very few greenfield sites are allocated for housing in the Plan, contributing a very small proportion of the housing requirement over the Plan period". The justification text accompanying policy OS22 on allotments states that the "Council does not currently rely on Greenfield sites other than those identified in the Plan to meet its housing requirements." PPG3 states that in identifying sites to be allocated for housing in plans, local authorities should follow a search sequence with the presumption that previously developed sites should be developed before greenfield sites. The plan review process should therefore include a review of existing greenfield sites already allocated to check if they are still needed and acceptable in PPG3 policy terms.</p> <p>Our objection would be met if, in identifying in the plan proposals relating to sites currently considered to be greenfield ones and having regard to the advice in paras 30 and 31 of PPG3, confirmation was provided that a review of the allocation of these sites has been undertaken establishing that they are still required for housing.</p>	The Plan has designated 44 sites for housing development purposes, of which only 2 could be construed as ‘green field sites’, as defined by PPG 12. Both of these sites comprise disused allotments which the Council has determined as surplus to Borough resident’s requirements, a position recognised by the UDP Public Inquiry Inspector. The Council considers that these sites are of a size and so located as to be	No further action

UDP CHAPTER 10: OPEN SPACE AND RECREATION

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
						particularly suitable for family sized dwellings, especially for affordable housing, for which there is a pressing need as many of the other designated housing sites would not afford a child-friendly environment.	

## UDP CHAPTER 13: PARK ROYAL

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2069	773	Dalton Warner Davis	13.10.3	Yes	<p>The alterations as further amended below are more consistent with the facts and Inspectors Report.</p> <p>Amend paragraph as follows: Delete "Although" and begin paragraph with "There".</p> <p>Include a fullstop after "retail uses".</p>	The proposed modifications make the reference to the consent requested by the Inspector. It also links to the existing text by making it clear how the site is allocated within the Plan.	No further action
2068	773	Dalton Warner Davis	PR6	Yes	<p>Evidence given by AsianSky at the Public Inquiry in 2002 demonstrated that removal of waste from the site was the only practicable means of securing development. If the word "remediation" is preferred to "removal", it should be made clear that remediation does not preclude removal. Furthermore it should be noted that the extant consent has approval for removal of waste.</p> <p>Amend second paragraph of policy as follows: After "remediation" insert (including removal)</p>	The term 'remediation' can also include removal. However, the suggested wording will be included for clarity.	Proposed Further Modification

UDP CHAPTER 14: WEMBLEY REGENERATION AREA

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2070	978	Copland Community School and Technology Centre Foundation	WEM1	Yes	<p>Due to the wording of this policy there is some ambiguity as to whether the policy relates to the National Stadium Policy Area, Wembley Regeneration Area or Wembley Town Centre. We suggest that the policy should be re-worded in order to make this distinction.</p> <p>If the policy relates to the whole of the Wembley Regeneration Area or Town Centre, we object to modifications to policy WEM1. Residential development has an important role to play in the regeneration of the Wembley area, as recognised by UDP policy WEM4. The modifications to policy WEM1 do not specifically encourage residential development within Wembley and as such are in conflict with national, regional and local plan policies.</p> <p>The Wembley Regeneration Area is a large area that includes Wembley town centre and surrounding areas. PPG3 specifically states that the focus for additional housing should be within existing towns and cities. Paragraph 51 of the document states that local authorities should promote additional housing in town centres within the context of their overall strategy for each centre. Furthermore, greater intensity of residential development is encouraged within areas of good public transport accessibility, such as Wembley town centre. In addition, the Draft London Plan specifically identifies Wembley as an Opportunity Area and allocates a target of 400 new homes within the area in the period up to 2016. Furthermore, UDP policy WEM4 specifically encourages higher density development within the Wembley Regeneration Area.</p> <p>Residential development within accessible centres such as Wembley are therefore specifically encouraged within national, regional and local planning guidance. We therefore recommend that if the policy relates to the Wembley Regeneration Area or Wembley Town Centre it should be re-worded as follows;</p> <p>‘The regeneration of the Wembley Area (including the Wembley Regeneration Area/Wembley Town Centre/National Stadium Policy Area*)</p>	<p>This is a general policy supporting regeneration across a wide area of Wembley. It is not accepted that there is any conflict with Government policy. Policies elsewhere in the Plan e.g. STR18, STR19 promote the housing development, and state that it is a priority alternative land use. More intensive development is promoted in town centres and where there is very good public transport access.</p>	No further action

UDP CHAPTER 14: WEMBLEY REGENERATION AREA

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>as a regional sport, entertainment, and leisure, including hotel destination will be supported. New residential development is also encouraged, where an acceptable residential environment can be ensured. The regeneration of Wembley Town Centre is also supported, which may involve the eastward expansion of the existing centre towards the stadium. Industrial and business development is promoted in the Strategic Employment Area to the east of the Stadium’.</p> <p>* please delete as appropriate</p>		
1979	790	Cricklewood Redevelopment Limited	WEM1	Yes	The objector maintains their original objection.	There is no specific objection to the modifications to the policy. The Council’s response remains as before.	No further action
1988	973	Quintain Estates and Development PLC	WEM1	Yes	<p>In order to properly consider the importance of the Comprehensive Development Area, in terms of the scale and function of uses which can be appropriately located, and reflect the guidance given in the Parliamentary Statement dated 10th April relating to PPG6, it is recommended that Policy WEM1 be reworded as follows:</p> <p>“The regeneration of the Wembley Area as a national sporting destination, with supporting large scale entertainment, leisure, and shopping uses will be supported. The regeneration of Wembley Town Centre is also supported, which will involve the eastward expansion of the existing town centre towards the stadium. Industrial and business development is promoted in the Strategic Employment Area to the east of the Stadium. New residential development will also be appropriate, where an acceptable residential environment can be ensured.”</p>	The development of large-scale retail uses in particular will have to comply with the sequential approach to development. There is nothing in the Parliamentary Statement which necessitates a change to the wording of this policy.	No further action
2003	965	Wm Morrison Supermarkets plc	WEM1	No	Wm Morrison supermarkets plc support the changes to draft policy wem1. In particular, they welcome the support for the regeneration of Wembley town centre and an acknowledgement that this may involve the eastward expansion of the existing centre.	Support welcomed	No further action

UDP CHAPTER 14: WEMBLEY REGENERATION AREA

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					This may provide greater opportunities for the provision of a major food store in a sequentially preferable location, within or on the edge of Wembley town centre		
1989	973	Quintain Estates and Development PLC	WEM2	Yes	In order to properly consider the importance of the Comprehensive Development Area, in terms of the scale and function of uses which can be appropriately located, and reflect the guidance given in the Parliamentary Statement dated 10th April relating to PPG6, it is recommended that Policy WEM 2 be reworded as follows: “Improved linkage will be sought between the north and west of the Stadium linking Olympic Way and Wembley Town Centre, as part of the development of opportunity sites referred to in Policy WEM 29. Contributions to the development of improved linkage will be sought from development served by it, or it should be demonstrated how development will contribute to securing improved linkage.”	It is not considered that there is any benefit in making the proposed change. The policy is specifically seeking improved, pedestrian linkages, i.e. a pedestrian route.	No further action
1980	790	Cricklewood Redevelopment Limited	WEM2	Yes	The objector maintains their original objection.	No specific objection to the modification of the policy. Council response remains as for original objections.	No further action
2063	977	Greater London Authority	14.6.5	Yes	The Draft London Plan in paragraph 2B.86 makes it clear that commercial development at Wembley should support its function as a world-class stadium and associated facilities including leisure development. It states that "strategically significant retail development associated with the stadium and arena would not be appropriate." However, taking into account the Mayor’s town centre policy, Central government guidance as set out in PPG6 and the clarification of the April 2003 ministerial statement a sequential approach is necessary for any town centre use/development. Applicants must therefore demonstrate quantitative need for such development and consider the impact on nearby centres. The very special character of Wembley town centre; the setting of the national stadium; the recent government decision to support the Mayor’s bid for the 2012 Olympics to be held in London and the need for strategic regeneration may allow a special case that offers flexibility that must be sustainable and not at the expense of the vitality and viability of the existing centre and other town	The Council accepts the concerns of the GLA and has proposed amendments to the supporting text of policy WEM3.	Proposed Further Modification

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Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					centres in the network and that offers strong visual, physical, economic and social links to the existing centre and improves its overall offer, character and attractiveness.  The GLA would welcome further discussions with Brent Council to determine appropriate changes to the text for reasoned justification to Policy WEM3 that reflects the special characteristics and circumstances of Wembley as raised earlier.		
1982	790	Cricklewood Redevelopment Limited	14.6.5	Yes	The objector maintains their original objection.	No specific objection to the modification of the policy. Council response remains as for original objections.	No further action
2002	965	Wm Morrison Supermarkets plc	14.6.5	Yes	Wm Morrison supermarkets plc object to the changes to draft paragraph 14.6.5. In particular, they object to the deletion of the words “...or adjacent ...” from the penultimate sentence of the paragraph.  They consider that the deletion of this text is inconsistent with the sequential approach to site selection, and may reduce the range of sites available to accommodate major food store development to function as part of Wembley town centre.  They also consider that this change conflicts with policy wem3, which advises that major food stores will be directed to sites within or adjoining the existing town centre.  They consider that this criterion, as currently worded, is unnecessarily restrictive, and inconsistent with advice in ppg6, which directs proposals for retailing and other key town centre uses to town centre locations, and encourages local planning authorities (at para 1.5) to recognise that the role and function of centres may change over time.  The objectors consider that proposed retail development in major town	The Plan identifies a site within the town centre, appropriate for a new food store, which is sequentially preferable to sites adjacent to the centre and therefore it is appropriate to delete this paragraph.	No further action



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					centres and district centres should be designed to meet identified needs in the locality, rather than restricted in scale to the existing role and function of the centre within which it is located.  They consider that this criterion, as currently worded, may prevent retail development for which there is an identified need in coming forward on sequentially preferable sites.  Wm Morrison supermarkets plc suggest, therefore, that the words “... or adjacent” should be reinstated in the penultimate sentence of paragraph 14.6.5.		
1981	790	Cricklewood Redevelopment Limited	WEM3	Yes	The objector maintains their original objection.	No specific objection to the modification of the policy. Council response remains as for original objections.	No further action
1990	973	Quintain Estates and Development PLC	WEM3	Yes	In order to properly consider the importance of the Comprehensive Development Area, in terms of the scale and function of uses which can be appropriately located, and reflect the guidance given in the Parliamentary Statement dated 10th April relating to PPG6, it is recommended that Policy WEM 3 be reworded as follows: “Large-scale leisure, entertainment and retail uses will be directed to the National Stadium Policy Area subject to compliance with the sequential approach to selecting sites for such uses (see Policy SH3 of the Shopping Chapter) and to the requirements of Policy WEM9 relating to public transport accessibility.  Development within the National Stadium Policy Area should contribute to achieving a mix of land uses, unless a single use proposal would enhance vitality by increasing the overall range of uses in the area.  New development on the Major Opportunity Sites to the east of Wembley town centre should be an extension of the existing town centre and be integrated with it. It should benefit the town centre in quantitative and	Suggested changes to the penultimate paragraph do not substantially alter the requirement to link to the town centre. The only substantive suggested change relates to the maximum size of foodstore permissible. The Plan identifies a site within the town centre for the development of a new foodstore therefore the limit on foodstores beyond the town	No further action

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Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>qualitative terms and enhance its role as a gateway to the National Stadium and associated development. To that end, development should provide, or contribute towards, improved linkages to the town centre. The links should, where possible, have pedestrian and dedicated bus priority, and continuous active frontages.</p> <p>Major foodstores will be directed to sites within or adjoining the existing town centre (see Policy WEM30). Elsewhere foodstores will be restricted to a maximum of 2,900 sq m gross floorspace.”</p>	centre is appropriate.	
2010	965	Wm Morrison Supermarkets plc	WEM3	Yes	<p>Wm Morrison supermarkets plc object to draft policy wem3, and, in particular, the final sentence of this policy.</p> <p>Whilst they support the acknowledgement in the final paragraph of this policy that major foodstores will be directed to sites within or adjoining the existing town centre, they object to the restriction placed on the scale of foodstores which will be permitted elsewhere to a maximum of 2,000 sq.m.</p> <p>They objectors consider that if a need for a foodstore is identified, which cannot be accommodated within or on the edge of Wembley town centre, then it would be appropriate to consider other sites, in a manner consistent with the sequential approach to site selection, to accommodate that need.</p> <p>The objectors consider, therefore, that it is inappropriate to limit the floorspace of foodstore proposals on sites in locations that are not within or on the edge of Wembley town centre, if such sites accord with the sequential approach to site selection.</p> <p>Wm Morrison supermarkets plc suggest, therefore, that the final sentence of draft policy wem3 should be amended to read as follows:</p> <p>“elsewhere foodstores will be restricted to a maximum of 7,711 sq.m. gross floorspace.”</p>	The Plan identifies a site within the town centre which is sequentially preferable therefore a limit on the size of foodstore on other sites is appropriate.	No further action
2001	973	Quintain Estates and	14.7.5	Yes	<p>Paragraph 14.7.5 should clarify the scope of Policy WEM11 by referring to the necessity test and works which are made necessary by the proposed</p>	It was accepted by the Inspector that the	No further action

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Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
		Development PLC			development in accordance with Circular 1/97. Developer contributions and obligations should only be sought where made necessary by the proposed development.	general reference in the Plan, at paragraph 2.7.4, to Circular 1/97 means that it is unnecessary to repeat the principles for individual policies.	
1983	790	Cricklewood Redevelopment Limited	WEM14	Yes	The objector maintains their original objection.	No specific objection to the modification of the policy. Council response remains as for original objections.	No further action
1984	790	Cricklewood Redevelopment Limited	WEM23	Yes	The objector maintains their original objection.	No specific objection to the modification of the policy. Council response remains as for original objections.	No further action
2064	977	Greater London Authority	WEM29	Yes	The promotion of a major new conference facility needs to be subject to the test of commercial viability.  Add “but will be subject to commercial viability and thereby sustainability for the London economy” at the end of the last sentence of the paragraph commencing “Major new conference, arena..”	Accept.	Proposed Further Modification
2065	977	Greater London Authority	WEM30	Yes	Reference needs to be made to whether a Town Centre car parking strategy exists and if not should be done as a matter of urgency and developed prior to the first planning application for any of the three sites at Elm Road, Curtis Lane and Central Square.	There is currently no town centre car parking strategy for Wembley.	No further action
2066	977	Greater London Authority	WEM30	No	The Copland School site is within the designated Wembley Town Centre and development proposals should reflect this location.	Support welcomed.	No further action
2071	978	Copland Community School and Technology	WEM30	Yes	We object to the proposed modification of policy WEM30 and specifically paragraph (e) relating to the Copland school site.  The modification of the policy to limit the extent of any redevelopment of the	The limit on the extent of development into open land is considered	No further action

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Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
		Centre Foundation			<p>site so that it would not result in the loss of playing fields to the south of the public footpath is unnecessary and would restrict the potential for the comprehensive redevelopment of the site.</p> <p>Copland Community School and Technology Centre Foundation have submitted a planning application relating to this site for the development of a new school and ancillary facilities including a dual use sports and arts facilities as well as housing and retail and/or leisure development. The application has not yet been determined, however has been the subject of discussions with the Local Planning Authority, Greater London Authority and Sport England. The development would result in significant benefits to the local community and has been carefully designed in order to minimise the loss of the open area to the southern part of the site. The proposals involve the development of a small section of land to the south of the public footpath across the site.</p> <p>It is important to note that Sport England have indicated in their representations to the application that the encroachment of the development onto a small amount of the existing open space on the site is acceptable given the significant benefits of the scheme to sport and the local community. This demonstrates that policy WEM30 (e) as proposed is overly prescriptive and should not seek to prevent development to the south of the existing public footpath across the site.</p> <p>Furthermore, there are rigorous and up to date national policies set out within revised PPG17 (2002) and also local policies contained within the adopted and emerging local plan (policy OS8) regarding the development of playing fields. The overall aim of the guidance is to protect playing fields from development, however it is acknowledged that there are circumstances where such development is acceptable, including when a development would result in the provision of playing fields that are of better quality or would result in the provision of sports facilities that are of sufficient benefit to outweigh the loss of the playing field. We note that the post inquiry proposed modifications to the UDP update relevant policies to</p>	appropriate and reflects the planning brief agreed by Council in 2001 for the site. Any development beyond would have to be justified by demonstrating exception circumstances.	

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Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>ensure that they accord with PPG17 and we welcome these changes. Any application relating to the site will be rigorously assessed against these policies and therefore there is no justification for the policy to further restrict development at this location.</p> <p>The development of the site is an opportunity to make a significant contribution to the regeneration of the Wembley area. The site is in close proximity to good public transport links and presents an excellent opportunity to provide a state of the art educational environment incorporating sports facilities that would become a key community resource. The policy as proposed is inflexible and will restrict the opportunity to maximise development through the most efficient use and layout of the site, as promoted by policy 4B.1 of the draft London Plan.</p> <p>In addition, we object to the proposed change to the policy which states that the street trees along the frontage of the High Road should be retained as part of any development. Any proposed development will be subject to a comprehensive landscaping strategy for the whole site that will take into account the need for landscaping along the High Road frontage and although this is likely to include the retention of trees along the High Road, the retention of all trees may not be practical and/or feasible. Therefore it is inappropriate to include reference to this matter within UDP policy.</p> <p>Furthermore, the policy states that ‘proposals should include safety improvements to Cecil Avenue junction’. This part of the policy is poorly worded, however we presume that such improvements should only be required if (1) the proposals have an access off Cecil Avenue and (2) improvements are deemed necessary on highway safety grounds. In order to avoid any ambiguity, we propose that this part of the policy is re-worded accordingly.</p> <p>In summary, the modification of policy WEM30 (e) as proposed is overly prescriptive and would unnecessarily restrict the significant opportunity for the comprehensive development of the Copland School site. We therefore</p>		

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Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>request that the policy is amended so that it reads as follows;</p> <p>‘(e) Copland School Frontage – This proposal relates to the Copland School site on Wembley High Road as identified on the proposals map. Development should be compatible with the school and the siting of replacement school facilities should not result in significant loss of playing fields south of the public footpath. If necessary, proposals should include safety improvements to any access off Cecil Avenue’</p>		

UDP CHAPTER 15: SITE SPECIFIC PROPOSALS

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
2038	975	Sudbury Court Resident's Association	HP31	Yes	Following the Inspector's recommendation that the designation of this site for 'affordable housing' should be deleted, and consideration should be given to development of "mixed use comprising elements of housing / facilities appropriate to scale and function of the adjoining local centre / employment uses (Class B1)", it seems contrary that a recommendation for 'housing' should have been made without, apparently, an adequate investigation having been made of the primary recommendation of the Inspector before opting for the secondary proposal. We are advised that the Council has only had discussions with the current owners of the site about this re-designation and feel that such consultation cannot by any means be considered to be a full investigation of the potential of this site for mixed use development.	Proposal HP 31, as amended, reflects the Council's approved Planning Brief for the redevelopment of this site. The Council considers that the development of additional retail facilities at this site is unnecessary as there is no need for new floorspace on the edge of the local centre.	No further action
2040	976	Mr D. O'Connor	HP31	Yes	<p>I note that the Inspector recommended mixed-use development for the site, and the deletion of the "affordable housing" designation as the site was unsuitable for this type of development.</p> <p>Brent Planning Department have now designated the site for "housing" and seem to have decided that a mixed-use development is too complicated, presumably having consulted the current owners / developers.</p> <p>The following points seem to be relevant:</p> <p>1) The views of the current owners / developers should not be paramount, nor should they in any way determine the final UDP designation for the site.</p> <p>2) While no doubt the views of the current owners / developers are being taken into account, this contrasts sharply with the attitude of the Planning Department towards the previous owners (Lidl Supermarkets). Their views and wishes for a block of flats and a small supermarket were ignored, mainly on the grounds that affordable housing only would be considered. A Lidl development would have been of benefit to the local community.</p>	Proposal HP 31, as amended, reflects the Council's approved Planning Brief for the redevelopment of this site. The Council considers that the development of additional retail facilities at this site is unnecessary as there is no need for new floorspace on the edge of the local centre.	No further action

UDP CHAPTER 15: SITE SPECIFIC PROPOSALS

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>3) The King's Head, Harrow on the Hill site has recently been the subject of a planning appeal. According to the Harrow Observer, some 30 apartments and a ground floor restaurant have been given the go ahead (i.e. a mixed use development).</p> <p>Having regard to the above and the recommendations of the Inspector, a mixed-use designation for the former Phillips garage site is preferable, provided any development is of a high standard, and has regard for the fact that part of the site is within the Conservation Area. Such a development could largely comprise housing / flats but should include on the ground-floor, some developments of benefit to the local community e.g. shops, restaurant, bar, launderette, such a development should be viable.</p> <p>The latest Planning Department designation for the site is housing. I am objecting to this designation and ask that it be replaced by a mixed use development which would include housing / retail (as recommended by the Inspector).</p>		
2011	932	Lancelot & Harrowdene residents association	HP32	Yes	<p>I and the 2000 approx residents, (see petition regarding the same, submitted previously), object at the Councils failure to acknowledge the Inspector's acknowledgement that open space on site HP32 should be preserved irrespective of any form of development.</p> <p>The Inspector's Report noted that the Council had previously agreed to have open space on this site, under the provision set out in OS22, they have not indicated the same in the latest round of Deposits, the amendment of which is a reasonable expectation on the part of the Council, for which the reason for not doing was given as oversight.</p> <p>Therefore, we the residents respectfully ask the Council to consult with Committee in order that the Deposit be amended and updated to include the above.</p>	The Council considers that the Proposal HP 32, as amended, requirement to provide an “area of public open space” in any redevelopment of this site should substantially satisfy the concerns raised by this representation.	No further action
2075	793	GOL- Planning Division	DP6	Yes	This proposal in Metropolitan Open Land (MOL) is for a range of uses - A3, hotel, community facilities, arts centre / gallery, theatre and offices. The enabling development is proposed to secure the future of a listed building at	Not Duly Made Objection.	Proposed Further Modification



UDP CHAPTER 15: SITE SPECIFIC PROPOSALS

Rep. Ref	Obj. Ref	Objector Name	Policy / Para No.	Obj	Representation Detail	Council Response	Action
					<p>risk. The proposal states that exceptional circumstances exist to permit limited inappropriate uses on MOL within the building. In objecting at revised deposit stage, we considered that this was not an appropriate way of handling the development of this site. It is noted that the Inspector did not recommend any modifications to be made. She considered that the proposals for the reuse of Dollis Hill House broadly conformed with advice in PPG2 and PPG15 and that the inclusion of a site specific proposal was preferable to relying on the more general policy for MOL as it provides certainty for those interested in renovating the building together with an opportunity for public comment.</p> <p>Notwithstanding that the Council consider that exceptional circumstances exist in this case to permit limited inappropriate uses, we remain concerned that the site specific proposal fails to explain that any future application proposing inappropriate uses on MOL would still need to demonstrate the very special circumstances to justify the development proposed (PPG2 and RPG3 paragraph 7.7-7.10). Our objection would be met by the inclusion of a reference explaining this in the development objectives paragraph of the proposal.</p>	<p>Does not relate either to a specific Proposed Modification or the Council’s failure to accept the Inspector’s recommendation,</p> <p>Notwithstanding the Not Duly Made status of this objection, the Council considers it reasonable to address this concern through an appropriate further modification.</p>	