

## Appendix 1

### Representations Received at Preferred Options Stage (2014) and Council Response.

Specific on-line representations and their responses are listed first. These are followed by questionnaire representations and responses.

#### Chapter 1: Introduction

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 1: Intro	Foreword		Claire Hewitt	Anon
<b>Comments</b>				
I can only comment on my area. I live in NW2 4BU. Willesden high Road is a sad place; Too many betting shops. A Sainsbury that has a scruffy neglected forecourt. Metro Textiles, stock piling buildings, it seems to me at Walm Lane/ Willesden lane for no purpose except perhaps future profit and a once magnificent block of Victorian mansions Rutland Park left derelict and half empty. Empty shops too and one wonders what incentives could be given to landlords to rent them cheaply and bring some life back. I'm in my 70's and remember a more vibrant high Road with touches of elegance, bustle and community. The old library now looks incongruous squeezed into a fraction of space stolen from the only swathe of broad forecourt possible on the tight narrow street. Once it's reopened I hope the 100's of displaced students who used it will be back. I appreciate the labour ethos of our council, but if it takes private capital to regenerate the area...let it Happen.				
<b>Council Response</b>				
The DMP contains policies to promote the viability of town centres. For example by promoting a viable mix of uses and preventing an overconcentration of uses such as betting shops. The council's Regeneration Team seek funding and deliver projects to improve Brent's town centres. In Willesden this has included the promotion of meanwhile uses in vacant premises.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 1: Intro	Opening Comment		James Stevens	Home Builders Federation
<b>Comments</b>				
We would question the wisdom of bringing forward this document in advance of the Further Alterations to the London Plan (FALP). The London Plan is part of the development plan for Brent. There is the possibility that the FALP may introduce some changes to development management type policies. These changes will need to be reflected, if necessary, in Brent's Development Management Policies DPD. There are also some policies in Brent's Development Management Policies DPD that are contrary to the Government's announcement in relation to the Housing Standards Review and its Allowable Solutions consultation which will provide clarification on how applicants for planning permission can meet Part L of the Building Regulations. We recommend that the Council awaits the outcome of the FALP before it proceeds to the next stage of its consultation on this local plan. We also recommend that the local plan is supported by a viability assessment. The Council should involve representatives of the development industry as well as others to discuss land values and sales expectations. This would assist with the production of a reliable viability assessment that has the support of a range of stakeholders.				
<b>Council Response</b>				
Planning Policy is continuously under review, therefore, it will always be the case that whilst policies are in development there may be changes to the national and regional policy context. In taking the DMP to publication stage its consistency with the FALP has been assessed. In addition its consistency with emerging national standards have been considered as far as is possible. The DMP includes the detailed decision making policies. It is not a requirement for these policies				

to be subject to viability assessment in the same way, for example, a CIL charging schedule or Site Specific Allocations DPD would be subject to such an assessment.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 1: Intro	Structure		Dr Michael GP Maguire	
<b>Comments</b>				
1.1 The draft Plan commences, after a very brief Introduction (1.5 pages long), with the Town Centres chapter and policies. This is a fundamentally inappropriate choice of opening chapter and policies, which is at variance with the overarching imperative, that the Plan's policies must ensure sustainable development which protects and enhances the existing environment, both built and natural.				
1.2 This Plan therefore represents a very detrimental step backwards from the Preferred Options Development Policies DPD (June 2007), which commenced with the Promoting a Quality Environment section, comprising the following chapters, or subsections :				
2.1 A Better Townscape - By Design, 2.2 Towards a Sustainable Brent, 2020, 2.3 Environmental Protection, 2.4 Enhancing Open Space and Biodiversity, 2.5 Promoting a Quality Environment Appendix,				
1.3 While recognising that the organisation and structuring of these chapters, or sub sections, could have been improved by a more concise information presentation, with very detailed material better placed as appendices at the end of the Plan (particularly 2.5). None the less, this overarching presentational format much better reflected the key imperative of ensuring sustainable development, while protecting and enhancing the environment, than the proposed Plan.				
<b>Council Response</b>				
The DMP chapters have been structured to reflect the current structure of the adopted Core Strategy for consistency.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 1: Intro	Paragraph	1	Robert Dunwell	QARA
<b>Comments</b>				
1.1. Purpose of the DMP (para. 1.3 "SPGs" - Without revision and update of SPD 17, SPD 5 etc. this DDMP cannot be a valid practical document with which to address planning applications. At least SPD 17 and SPD 5 need to be consulted upon and examined in unison with this DDMP. The SPD's mentioned are generally recognised to be well past their revision date (many years past!) and are most unreliable before Planning Public Inquiries. As such, further progress towards examination of this DDMP should temporarily halt until the aforesaid SPD/s are revised.				
<b>Council Response</b>				
SPD supplement policies in Development Plan Documents. Accordingly, the council is therefore prioritising taking forward the Development Management Policies DPD. The council will then update SPG with relevant SPD to reflect the updated policies.				

## Chapter 2: Town centres

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.1	Robert Dunwell	QARA
<b>Comments</b>				
Elucidation of the word "role" needed (e.g. "fundamental business and community role")				
<b>Council Response</b>				
It is considered the subsequent sentences adequately elaborate on the many roles town centres play.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.1	Anon	Anon
<b>Comments</b>				
Shisha cafes are an unwelcome new addition to the high street - as we ban smoking we make it seem convivial and 'smart' to join in, especially as they offer different flavours etc which may attract a younger audience and clientele. It is not clear to the users that are smoking tobacco again even if it is not a cigarette. As for take -aways limit them in the same way as betting shops and so on. A percentage per high street frontage. At present they cluster around tube stations and make it unpleasant to leave the station late at night due to smells and rubbish. Ensure that they clear up after their clientele too as mostly they don't provide litter bins outside their shops.				
<b>Council Response</b>				
Noted. In light of evidence that Shisha Cafes are promoting smoking to young people in the borough, and the associated health concerns, it is proposed to introduce a policy limiting the proximity of Shisha cafes to schools. In addition, to address clustering of takeaways it is proposed to introduce a policy which places a cap on the proportion of takeaways in town centres and their proximity to each other. Under policy DMP 2 non-retail uses such as takeaways will be required to adequately mitigate litter.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.2	Anon	Anon
<b>Comments</b>				
Wembley has too much street clutter around bus stop CS near Wembley central - bins, a phone box, shops that have crept put onto the pavements with people selling corn - have they got a license? Broken paving, a hoarding that's been there for years. It looks a mess. The area near Primark is heavily congested with people, and more street clutter.				
<b>Council Response</b>				
Policy on public realm is included in the London Plan. Further detailed guidance will be included in the emerging Designing Brent SPD. In many cases phone boxes can be installed without the need for planning permission.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.2	Anon	Anon
<b>Comments</b>				
again, enforce the policy. If shop owners are found to be in breach of this, then take the appropriate action. If they leave glass windows to their basements broken and in holes so that they are dangerous, then force them to mend them. the Council lacks enforcement officers and needs hem more than planners at this stage as many of these items are already there in council plans/bye-laws etc but as there are very few enforcement officers, they rules are ignored. What will you do if the pavement is not 3.5 metres wide?				
<b>Council Response</b>				
Comments relating to the need for further Enforcement Officers noted. In accordance with policy permission for forecourt trading would be refused where it creates an obstruction (i.e. A pavement width of 3.5m is not maintained).				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.2	Anon	Anon
<b>Comments</b>				
In Wembley town centre (near TK Maxx) all the high rise housing means that on a sunny day families come out of their flats into the space near TK Maxx to sit				

around, while small children whiz around on bikes and scooters, making it more like a housing estate. And then you have people on loud speakers sprouting their religious beliefs outside Wembley Central and Primark, causing a noise nuisance. What is Wembley town centre reflecting by being this way?

#### Council Response

Housing can support the viability of town centres by adding to the customer base and ensuring centres are used throughout the day. The Further Alterations to the London Plan identifies town centres as suitable locations for high density housing due to their accessibility. The London Plan's policies on housing standards, DMP1 and DMP 19 will be applied to all housing developments to ensure they provide a satisfactory amenity, whilst DMP 2 includes policy to manage the impact on amenity of town centre uses. Standards on play space and amenity space are also applied to housing in town centres.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.3	Anon	Anon
<b>Comments</b>				
I am not clear here if the 40% includes betting shops or are these classed as retail? Also, estate agents are classed as what? If you are talking about some areas of non-viable high street being turned over to housing then it is fine, but if the 40% means solicitor's offices etc then 40% is too high. The definition of retail needs to be very clear.				
<b>Council Response</b>				
Retail frontage is classed as uses falling within the use class A1 (shops). Betting shops are classified as Sui Generis and estate agents fall within use class A2 (financial and professional services). Clarification has been added to supporting text. It is proposed unviable frontage on the periphery of town centres could be redeveloped to housing, subject to a suitable residential environment being created. This is regardless of its previous use.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.4	Anon	Anon
<b>Comments</b>				
to help improve the viability of a high street the extent of the high street should be encored to be reduced The Willesden/Walm Lane High Road goes on and on with no focus in fact perhaps there is 3 high streets in this one road I believe that a more compact high street will function better The shops on the edges could be converted to residential and/or ground floor surgeries. To prolong the death of these marginal shops is creating a bad image of the area its better that the high street is vibrant with no empty shops than a parade of boarded up run down frontages. PROPOSAL: Encourage the reduction of the length/size of High street shops to ensure better focus and less secondary retail areas				
<b>Council Response</b>				
Noted. Policy DMP 1 allows for the consolidation of town centres through the redevelopment of unviable secondary frontage to residential.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.4	Robert Dunwell	QARA
<b>Comments</b>				
Detail justification as to why the "500sqm" limit has been chosen needs to be provided – in an appdx . This can then be rigorously examined, rather than a mere reliance on "Brent Council's feel".				
<b>Council Response</b>				
The accompanying Retail Impact Assessment Background Report (2013) provides detailed evidence on why the 500sqm constitutes and appropriate threshold for retail impact assessments in the Brent context. This was undertaken in accordance with the requirements of the NPPF and Planning Practice Guidance.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.5	Robert Dunwell	QARA
<b>Comments</b>				
“Meanwhile Use” needs here defining in specific terms as should the decision process itself. As is, reliance on generalities leads this process open to abuse; for example, frivolity and “political abuses”.				
<b>Council Response</b>				
Meanwhile use is defined in the glossary and explained in paragraph 3.7.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.5	Anon	Anon
<b>Comments</b>				
Meanwhile space is extremely important to assist in giving some vitality to a declining high street. But currently there is insufficient pressure on agents, landlords and owners to do this. Shops should be punitively taxed if kept empty when a meanwhile space could take the place. The Council agents should be proactively walking the high streets and targeting premises which have been empty for more than 3 months. Indeed it may be possible to arrange for semi-derelict shops to be brought back into viable use through collaboration with local colleges of FE etc. So there is no excuse for keeping a shop vacant.				
<b>Council Response</b>				
This is outside the scope of the Development Management Policies, but comments will be passed to the Regeneration and Investment team, who alongside other organisations, have been working to support meanwhile uses across the borough.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres		2.5	Dilwyn Chambers	N/A
<b>Comments</b>				
I am concerned that the Council does not have an office responsible for encouraging tourism. It might usefully be borne in mind that some possible tourist attractions (e.g. heritage buildings) are not located in town centres.				
<b>Council Response</b>				
Responsibility for promoting Brent outside of the borough to both visitors and businesses sits with the Investment Team. Many existing attractions are not in town centres, however, where new attractions are proposed they will be directed to town centres and Wembley Strategic Cultural Area. This is consistent with the London Plan. Visitor attractions help to support the vitality and viability of town centres by encouraging footfall and improving their offer.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Supporting Strong Town Centres	DMP 1	Simon Slateford	Fairview Homes
<b>Comments</b>				
We consider that it is important to acknowledge the changing role of town centres and the guidance in the NPFF. As such, we consider that reference should be made to the support for housing in town centres, as set out in the ninth bullet of paragraph 23 of the NPPF which states that, in drawing up Local Plans, local planning authorities should: recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.				
<b>Council Response</b>				
It is recognised residential development can play an important role in town centres, as such DMP 2 allows for the redevelopment of unviable secondary frontage for housing.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Supporting Strong Town Centres	DMP 1	Sarah Chaudhry	Property and Projects Team, Brent Council
<b>Comments</b>				
DMP1 supporting strong town centres – meanwhile we welcome the opportunity to use vacant town centre site and buildings as meanwhile the document states that non-retail frontage is not to be over 40% of the primary frontage how would D1/2 facilities be treated as these can add to a town centre.				
<b>Council Response</b>				
To take account of changes to use classes a limit of 35% applies to non A1 and A2 in the primary frontage, the retail core of a centre. It is important to protect a proportion of primary frontage for retail uses to protect the attractiveness of offer, and therefore viability of town centres. As such D1 and D2 uses would be acceptable in primary frontage, providing it would not result in the proportion of non-retail frontage exceeding 35%. D1 and D2 uses would also be suitable in the secondary frontage, where a more diverse range of town centre uses is appropriate.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Supporting Strong Town Centres	DMP 1	Robert Dunwell	QARA
<b>Comments</b>				
Within this policy should be stated that it will not override recent change of use legislation that allows change of use for “residential purposes”.				
<b>Council Response</b>				
New permitted development rights for conversion of shop units to residential go through a prior approval process, and are subject to a number of considerations including if the shop forms part of key shopping frontage and if it is needed to meet local need. Should either apply prior approval will not be given. In considering if either criteria apply consideration will be given to policy DMP 1 and DMP 2.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Supporting Strong Town Centres	DMP 1	Blair Thorpe	N/A
<b>Comments</b>				
to help improve the viability of a high street the extent of the high street should be encouraged to be reduced The Willesden/Walm Lane High Road goes on and on with no focus in fact perhaps there is 3 high streets in this one road I believe that a more compact high street will function better The shops on the edges could be converted to residential and/or ground floor surgeries. To prolong the death of these marginal shops is creating a bad image of the area its better that the high street is vibrant with no empty shops than a parade of boarded up run down frontages. PROPOSAL: Encourage the reduction of the length/size of High street shops to ensure better focus and less secondary retail areas				
<b>Council Response</b>				
Noted. Policy DMP 2 allows for the consolidation of town centres through the redevelopment of unviable secondary frontage to residential.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.6	Anon	Anon
<b>Comments</b>				
Many high streets are too long for current shopping habits and could be made more viable by reducing the frontage of retail and encouraging smaller 'villages' with strong retailers to flourish. This would be enhanced if the high street also became an area of housing - not offices! Additional open space could also be				

created when retail spaces and their back developments are considered along a stretch of high roads as many such retailers have large yards etc which could become green spaces or at least open spaces where trees and plant beds could be created with some children's equipment even.

#### Council Response

Proposed policy DMP 2 allows for unviable retail units on the periphery of town centres to be redeveloped for housing.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.7	Robert Dunwell	QARA
<b>Comments</b>				
The sentence, "It will - - - in this policy", is at best garbled, and is unclear as to its meaning and intent; needs rewriting and than opportunity to comment on the rewritten paragraph.				
<b>Council Response</b>				
Reworded for clarification.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.8	Anon	Anon
<b>Comments</b>				
As mentioned above, residential developments should be the preferred route to redeveloping areas of high streets which are no longer viable for retail. Not any other uses.				
<b>Council Response</b>				
Housing is the preferred use as set out in policy DMP 2.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.9	Anon	Anon
<b>Comments</b>				
If there are 11+ betting shops along Willesden High Road and there is no need to obtain planning permission to turn another shop into such a facility then it is clear we already have too many. We need however, to work the policy not by a percentage of the overall area but by the areas where most shopping takes place. So if there are 40 shops and 10 are betting then this is too many. I am not at all sure that one size fits all in this policy.				
<b>Council Response</b>				
In addition to a cap in terms of percentage, the policy DMP 3 also includes a restriction on the proximity of betting shops to each other, to ensure these uses do not cluster and overly dominate any part of the town centre.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.9	Anon	Anon
<b>Comments</b>				
This policy should not be limited to those areas in close proximity to schools. They should be limited in general, high streets such as Kilburn High Road/ Cricklewood Broadway have been over-populated by kebab/ takeaway/ shisha cafés, a more cosmopolitan offering could be possible in an area like Kilburn, however these establishments prevent the development of a more professional and diverse offering. They also influence the clientele visiting the area which has an impact on other retailers willing to open/ business that they attract.				



Council Response				
Noted. The policy also sets a limit on the proportion of takeaways across town centres.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.10	Robert Dunwell	QARA
Comments				
“Takeaways” need to be defined; The policy needs to differentiate between “unhealthy” takeaways and “healthy” takeaways. Otherwise, for example, an unfair discrimination case could be established.				
Council Response				
All hot food takeaways fall within use class A5. Research undertaken both nationally and by Brent Council's Food Safety Team found takeaway foods have high levels of salt, sugar, fat and saturated fat. All samples tested by the Food Safety Team were well above the recommended nutritional guidelines for children. Based on this evidence it suggests health takeaways would be an exception. At planning application stage it would not be possible to identify if a takeaway would provide a healthy offer, and once permission for an A5 use was granted it would not be possible to prevent a 'healthy' takeaway converting to an 'unhealthy' takeaway under permitted development rights. A policy which distinguished between different types of takeaway could not be enforced.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.11	Robert Dunwell	QARA
Comments				
Addition needed i.e. “shisha cafes and suchlike”.				
Council Response				
The evidence applies to Shisha cafes and therefore the policy is to apply to these uses only.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.12	Anon	Anon
Comments				
Currently penalties do not seem to be in place for takeaway/ restaurants that are polluting/ soiling street fronts. This should be enforced particularly where trash is placed on footpaths leaving oil and grease stains.				
Council Response				
The council's Environmental Health team enforce against these matters. Incidents can be reported directly to Environmental Health for investigation.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.12	Anon	Anon
Comments				
It is currently law that cars should not idle when parked. Cabs do this all the time. In relation to air pollution it would be helpful to enforce this law. reward cab companies that use hybrid cars or electric cars. check the motors they are using on a regular basis for pollution.				
Council Response				
The GLA have been proactive in undertaking a 'switch off your engine' campaign and the council is working with transport providers such as bus companies to				



raise awareness. The council cannot use planning powers to require taxi companies to use electric or hybrid cars.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.13	Claire Hewitt	N/A
<b>Comments</b>				
Re development Willesden High road...rescue it from betting shops and fast food...				
<b>Council Response</b>				
Noted. Proposed policy DMP 3 seeks to introduce policy to prevent an overconcentration of these uses.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.13	Robert Dunwell	QARA
<b>Comments</b>				
Derivation, calculation and assumptions relating to these percentages and general strategy need to be presented for consultation and examination.				
<b>Council Response</b>				
Detail relating to these percentages are included in the supporting evidence base, which was made available for comment alongside the policies during the consultation.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.14	Anon	Anon
<b>Comments</b>				
Take aways account for mot of the litter on the streets. Take aways should be severely limited in Brent to help with the litter problem. People should be encouraged to eat on site and food not to be removed from the premises if they are just going to throw their litter afterwards.				
<b>Council Response</b>				
It is acknowledged an overconcentration of takeaways can exacerbate problems such as littering, accordingly proposed policy DMP 3 seeks to prevent an overconcentration of takeaways by setting a cap on the proportion of frontage which can comprise takeaways and restrictions on their proximity to each other.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Anon	Anon
<b>Comments</b>				
The requirements here seem minimal, distances from schools should be increased, 400m is negligible. The definition of neighbourhood centre frontage should encompass frontage that may be under another council's responsibility but adjacent to Brent zoning. Kilburn is an example of this where residents feel that they suffer as a result of having their high street split between two councils responsibility (Brent/ Camden).				
<b>Council Response</b>				
The intention of the policy is to discourage children from visiting takeaways on their lunch break. As such 400m is considered a reasonable distance. Brent can only designate town centre frontage within the borough, however, in applying policies consideration will be given to the town centre as a whole, including parts falling in other boroughs. This will be clarified in supporting text.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Anon	Anon

Comments
<p>Whilst the restrictions might help I also feel there is too many licensed premises/bar My Walm Lane high road has too many these. They are not retail and do not make a good High street I feel like takeaways and pawn shops the concentration should be limited</p> <p>PROPOSAL: include limiting the number of pubs/bars</p>
Council Response
<p>Evidence collected by the council identifies that, unlike pawnbrokers and betting shops, the number of drinking establishments in the borough is declining. As such it has not been considered necessary to introduce a cap. Policy DMP 3 includes criteria to ensure in determining applications for such uses consideration is given to cumulative impacts including noise, anti-social behaviour and litter.</p>

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Camille Caro	N/A
Comments				
<p>1 - Over the past few years, it has become clear that land that pubs sit on in London is now worth a lot to developers. This makes pubs vulnerable and therefore they need more protection.</p> <p>2 - A real pub protection policy would ensure scrutiny of planning applications that seek to remove pubs, such as the Queensbury</p> <p>3 - As a local resident I would like to see pubs protected via a specific policy, not a catch-all policy which is easily sidestepped by a savvy developer. We don't want to lose all our pubs and want the council to support us, not aggressive development.</p> <p>4 - Developers seek to undermine pubs by claiming they are not viable and a policy would ensure such matters are discussed in detail, consistent with a pub policy. This has been proven by the current Queensbury case where Fairview have stated that the pub is not financially viable - when it clearly is - as stated by the Pub Managers</p> <p>5 - Lots of other councils have similar policies and protect their pubs, and so should Brent.</p>				
Council Response				
A specific pub protection policy has been added to the DMP in response to comments.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Natasha Harris	N/A
Comments				
<p>Pubs are an important part of our community, and should be protected from demolition by developers.</p> <p>This is a current issue in Willesden Green where we are at risk of losing our only decent pub (The Queensbury) in the area to a huge development where plans are not in keeping with the area in any way. In my opinion our pubs need protection for the following reasons:</p> <ol style="list-style-type: none"> <li>1. the land that pubs sit on in London is now worth a lot to developers and pubs are vulnerable and need protection.</li> <li>2. A proper pub protection policy would ensure scrutiny of planning applications that seek to remove pubs</li> <li>3. As a resident I would like to see pubs protected via a specific policy, not a catch-all policy which is easily sidestepped by a savvy developer. We don't want to lose all our pubs and want the council to support us, not aggressive development.</li> <li>4. Developers seek to undermine pubs by claiming they are not viable and a policy would ensure such matters are discussed in detail, consistent with a pub policy.</li> <li>5. Lots of other councils have similar policies and protect their pubs, and so should Brent.</li> </ol>				
Council Response				
A specific pub protection policy has been added to the DMP in response to comments.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Cllr Janice Long	N/A
<b>Comments</b>				
<p>Care should be taken in granting permission for community use in retail areas. Too often they are taken by religious groups and you end up with a building that is shut during normal hours, often with shutters (212-214 Church Road) or that is open in the evening and causes noise nuisance to residential units, corner of St Mary's Road/ Craven Park Road.</p> <p>These establishments also cause parking issues especially when they are open in the evening after the hours of operation of any CPZ. They often do not cater for the local population.</p>				
<b>Council Response</b>				
<p>In accordance with DMP 2 in determining applications within the primary frontage of town centres applications will be required to maintain an active frontage. DMP1 and London Plan Policy applies to applications for social infrastructure, such as places of worship. The policy sets out applications for such uses must have an acceptable transport impact, complement the character of the area and avoid adverse impacts on the amenity of surrounding uses.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non- Retail Uses	DMP 2	CAMRA North London	CAMRA North London
<b>Comments</b>				
<p>I have previously met with Councillor Muhammed Butt and expressed concern that Brent does not currently have a specific Pubs Protection Policy. Brent has suffered a near catastrophic loss of public houses over the last 15 years. If you turn right out of Willesden Green station it does not take long to see the once Spotted Dog as a prime example of conversion to residential. In Willesden alone, five pubs have closed in the last five years and three of these have seen a change of use to residential or other class. The ongoing threat to The Queensbury, opposite the tube station, is another indication of the threat to our local amenities. A specific Pubs Protection Policy would assist local communities in their wish to see such local amenities preserved both for them and for the future. CAMRA proposes that there needs to be much more positive and active wording for a dedicated Pubs Protection Policy in the Plan. Such protection should be specifically spelled out in separate clauses for pubs, not buried away in a subsidiary manner in some other section. Given that pubs are recognised as having a strong place at the centre of any community, these communities are more often than not local, and in the more residential areas.</p> <p>We submit that Protection needs to be spelt out, in terms of a presumption against any major change of use; active encouragement of registration of pubs as Assets of Community Value and the embodiment in writing of ACVs into the Plan so affording additional protection (as per guidance from the DCLG); active use as community hubs (and not just in shopping centres); and active use of Article 4 directions.</p> <p>Invariably, the speculators who acquire pubs are from outside the area, they have no loyalty to the community, they do not care how the local environment and community is affected because once they have made their profit, they will never be seen in the community again.</p> <p>Without a dedicated Pubs Protection Policy local communities will continue to suffer loss of their amenities. The character of the built environment will change forever. More and more it will be dominated by tracts of housing with very little for local people to do unless they travel away from their local area.</p> <p>Local communities will change for the worse; indeed without pubs there is an argument that a part of the glue which holds communities together will be lost - forever. And as a consequence that which is defined as community could also be lost.</p> <p>On behalf of CAMRA and the local residents of Brent, I therefore urge Brent to introduce a comprehensive Pubs Protection Policy by drawing upon the examples provided of other Council's policies which provide far greater protection for the public house.</p> <p>We cannot rely on National Government to do this, local people need their local Councils to act.</p>				
<b>Council Response</b>				
<p>A specific pub protection policy has been added to the DMP in response to comments.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Francine Lawrence	N/A
<b>Comments</b>				
<p>That is why I as a resident of Willesden Green insist that Brent Council does not make the same ludicrous mistake again with the Queensbury Pub. The Queensbury building, is one of the few buildings of character in the High Street/Walm Lane, but the land is very attractive to unscrupulous get rich quick developers.</p> <p>The pub is the ONLY community meeting place for people of all ages, with a garden area for families and a friendly welcoming atmosphere. There are other pubs, but they cater for different sectors of the community and are not welcoming to females who wish to meet their friends, families with children, people who work in the centre of town and want to have a social get-together on their way home from work.</p> <p>I am 60 year old female and I like to meet my friends at my local pub and have a meal and a chat in the evening, take this away and my options become ever reduced.</p> <p>The Queensbury provides good food at affordable prices and a restaurant for special occasions. It's a great place to show other Londoners that Willesden Green is not a sad run down semi suburb with characterless new buildings. We need more, not fewer places like this for young and old to meet. We don't want to lose all our pubs and you as councillors have been voted in to protect our community, not support aggressive development.</p> <p>We propose a proper pub protection policy would ensure scrutiny of planning applications that seek to remove pubs – and libraries.</p> <p>Developers seek to undermine pubs by claiming they are not viable, but that isn't their business. Pubs – and especially the Queensbury is an Asset of Community Value. A defined policy would ensure such matters are discussed in detail, consistent with a pub policy.</p>				
<b>Council Response</b>				
A specific pub protection policy has been added to the DMP in response to comments.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Joanna Hanley	N/A
<b>Comments</b>				
<p>I understand Brent will be looking at it's planning policy and I'd like to suggest that a policy is put in place to protect pubs in Brent. Pubs need to be protected - they're often on land which is valuable and therefore vulnerable to aggressive developers who often try and push through building applications. If a pub protection policy was in place, then this would ensure all plans involving pub land would be scrutinised and the viability of the pub would be questioned. In many cases these pubs are viable, are great assets to the community and residents don't want them bulldozed just to appease aggressive developers. I live in Brent - I like pubs - they're a massive part of our community and they need to be looked after by Brent. Lots of other councils in the UK have a pub protection policy in place, please can Brent have one?</p>				
<b>Council Response</b>				
A specific pub protection policy has been added to the DMP in response to comments.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Joanna Hanley	N/A
<b>Comments</b>				
<p>I understand Brent will be looking at it's planning policy and I'd like to suggest that a policy is put in place to protect pubs in Brent. Pubs need to be protected - they're often on land which is valuable and therefore vulnerable to aggressive developers who often try and push through building applications. If a pub protection policy was in place, then this would ensure all plans involving pub land would be scrutinised and the viability of the pub would be questioned. In many</p>				

cases these pubs are viable, are great assets to the community and residents don't want them bulldozed just to appease aggressive developers. I live in Brent - I like pubs - they're a massive part of our community and they need to be looked after by Brent. Lots of other councils in the UK have a pub protection policy in place, please can Brent have one?

#### Council Response

A specific pub protection policy has been added to the DMP in response to comments.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Lucy Duxbury	N/A

#### Comments

As a local resident I would like to make my feelings known regarding the planned change of use/demolition of the Queensbury Pub in Willesden Green. I would like to encourage Brent Council to have a proper pub protection policy based on the following points:

- the land that pubs sit on in London is now worth a lot to developers and pubs are vulnerable and need protection.
- a proper pub protection policy would ensure scrutiny of planning applications that seek to remove pubs.
- as a resident you would like to see pubs protected via a specific policy, not a catch-all policy which is easily sidestepped by a savvy developer. We don't want to lose all our pubs and want the council to support us, not aggressive development.
- developers seek to undermine pubs by claiming they are not viable and a policy would ensure such matters are discussed in detail, consistent with a pub policy.
- lots of other councils have similar policies and protect their pubs, and so should Brent.

#### Council Response

A specific pub protection policy has been added to the DMP in response to comments.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	N/A	Make Willesden Green

#### Comments

We support the calls for restrictions on the numbers of chicken shops and payday lenders on high streets, although we are not sure why shisha shops appear to have been lumped in with this. However, we are concerned that such a restriction in isolation, without some measures to support independent businesses, could lead to either more empty shops or a proliferation of chain stores. We therefore suggest that Brent offers some form of claw back of business rates for independent specialist retailers and additionally looks at ways that some form of "Tesco tax" can be implemented.

#### Council Response

Business rates are outside the scope of the DMP, however, comments will be passed to the relevant department. The proposal for a 'Tesco Tax' was recently rejected by the Secretary of State, making it unlikely that this will be an option for council's in the future. The DMP includes policy to promote independent retailers, for example by supporting meanwhile uses. Meanwhile uses allow vacant buildings and land to be brought into temporary use. This allows start up businesses to trial a business idea with reduced overheads, and can support the establishment of permanent businesses.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Matt Fielding	N/A

#### Comments

Managing impact on amenity – I would also add that the policy should consider whether the asset they are likely to replace is an asset of community value. Should that be the case greater consideration should be given to the proposal in line with other sections of the plan. I support the council having an active policy

on betting shops, gaming centres, pawnbrokers, takeaways etc. Where there is a perceived over-concentration of use, it makes perfect sense for a council to have an active policy to seek to put in on the front foot where any further applications are made. However, I do not understand why the council does not have an active policy on assets that provide a community benefit and are of value (for example: pubs such as the Queensbury, Busy Rascals which uses the Queensbury, libraries etc). The policy looks rather skewed if it has a policy to try and prevent our town centres getting worse through over-concentration of shops where an abundance of them is perceived to be detrimental, but does not seek to also proactively protect those that do offer a benefit to our community.

#### Council Response

A specific pub protection policy has been added to the DMP in response to comments. Supporting text clarifies significant weight will be given to the protection of Assets of Community Value. This will be a material consideration.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	N/A	Planware

#### Comments

This objection relates to Policy DMP 2 of the above consultation document. We have considered the policy with regard to the principles set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework. We consider that limiting the number and location of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people’s dietary choices. There is no adequate evidence to justify the underlying assumption, that locating any A5 use within certain distances of schools causes adverse health consequences, which would in turn have negative land use planning consequences. The evidence does not support this chain of reasoning or the significant restriction on the location of A5 uses. The policy is not positive, justified, effective or consistent with the Framework. Restricting the number and location of new A5 proposals within the borough, is not a positive approach to planning. The Frameworks “foreword” promotes sustainable development this is about positive growth, making economic, environmental and social progress for this and future generations. As worded, the policy takes an ambiguous view of A5 uses in relation to the proximity to secondary schools and further education establishments. It applies an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.

#### Council Response

The policy is justified as set out in full the accompanying Takeaway Policy Background Report (2013). In summary, The National Planning Policy Framework (2012) emphasises that the purpose of the planning system is to contribute towards sustainable development. One of the three dimensions in achieving sustainable development is for the planning system to perform a social role by supporting ‘strong, vibrant and healthy communities. ‘Consequently one of the core planning principles is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all and deliver sufficient community and cultural facilities and services to meet local needs.’ In relation to plan making, local authorities should have an up to date and relevant evidence base for the Local Plan. To develop this evidence base local planning authorities are to work with public health organisations to understand and take account of the health status and needs of the local population and information about relevant barriers to improving health and wellbeing. Accordingly, this policy has developed with regard to Brent’s Joint Strategic Needs Assessment, which highlights Brent’s key health and wellbeing challenges as including rising levels of obesity, particularly childhood obesity, cardiovascular disease and diabetes. Brent’s Obesity Strategy includes a number of key actions to address the serious issue of rising levels of childhood obesity, including restricting the proximity of takeaways to schools. Such policies have been found sound at examination, most recently at the examination of Brent’s Area Action Plan for Wembley.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Non-Retail Uses	DMP 2	Chris Colloff (Savills)	Thames Water

#### Comments



Thames Water seeks that grease traps are installed in all catering establishments. These traps must be regularly cleaned and maintained. Failure to enforce the effective use of grease traps will result in the build up of food deposits in sewers and drains. This can cause blockages and flooding resulting in emergency cleaning. These food deposits may also encourage the migration of rodents into the wastewater infrastructure and encourage their proliferation.

#### Council Response

This will be covered by the development management general policy, which requires mitigation for waste and contamination.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Neighbourhood Centres and Isolated Shop Units	DMP 3	Ian Elliott	Save the Queensbury

#### Comments

The consultation also reads that "in keeping with the NPPF, public houses are classed as social infrastructure and proposals which would result in their loss will be subject to this policy and town centre policy DMP 3 'Neighbourhood Centres and Isolated Shop Units" However the latter policy makes absolutely no reference to public house. Hence any suggestion that the proposed 'infrastructure' policy is redundant and will be easily evaded at planning decision and appeal stage. If Brent Council is serious about protecting its public houses the it would bring forward a policy that will be effective, as so many other local authorities have done.

#### Council Response

A specific pub protection policy has been added to the DMP in response to comments.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Neighbourhood Centres and Isolated Shop Units	DMP 3	Robert Dunwell	QARA

#### Comments

last sentence – “affordable housing” to be replaced by the words “housing, with affordable housing being the preferred option depending on individual circumstances”.

#### Council Response

It is acknowledged with new permitted development rights conversion can take place, without the need for planning permission, therefore the council will not have a mechanism to require affordable housing, this reference has therefore been removed from the policy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Neighbourhood Centres and Isolated Shop Units	DMP 3	Ian Elliott	Save the Queensbury

#### Comments

The consultation also reads that "in keeping with the NPPF, public houses are classed as social infrastructure and proposals which would result in their loss will be subject to this policy and town centre policy DMP 3 'Neighbourhood Centres and Isolated Shop Units" However the latter policy makes absolutely no reference to public house. Hence any suggestion that the proposed 'infrastructure' policy is redundant and will be easily evaded at planning decision and appeal stage. If Brent Council is serious about protecting its public houses the it would bring forward a policy that will be effective, as so many other local authorities have done.

#### Council Response

A specific pub protection policy has been added to the DMP in response to comments.



Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Neighbourhood Centres and Isolated Shop Units	DMP 3	N/A	Make Willesden Green
<b>Comments</b>				
<p>The consultation reads that "in keeping with the NPPF, public houses are classed as social infrastructure and proposals which would result in their loss will be subject to this policy and town centre policy DMP 3 'Neighbourhood Centres and Isolated Shop Units'". However the latter policy makes absolutely no reference to pubs. Hence this will be easily evaded at planning decision and appeal stage. Tagging "public houses" on the end of a list of buildings deemed to be community infrastructure is an ineffective and insufficient substitute for a dedicated pub protection policy. Brent should follow the example of local authorities in Lewisham, Kensington &amp; Chelsea and Cambridge, among others, in adopting a detailed pub protection policy. As part of the policy, these local authorities maintain either a formal register or an informal list of all the pubs within their area. Under the new draft DMP, it is highly likely that planning officers would have reached the same conclusion as they did in March 2014, recommending demolition of The Queensbury. The purpose of a pub protection policy is to give proper consideration where (for example) a developer claims a pub is not viable or not needed. A pub protection policy would have established the value of The Queensbury and its building early on in the planning process, saving the planning department a lot of work and residents of Willesden Green a lot of distress. The draft DMP does not propose any additional protection for buildings which are listed as Assets of Community Value under the Localism Act. ACV-listed buildings should be protected from applications for Change of Use. The process for an ACV listing already requires a very high bar so the fact of it being worth preservation should not be in question. Although ACV regulations are not primarily planning regulations, it should be noted that 2.20 of the DCLG guidance on ACVs states: "However the fact that the site is listed may affect planning decisions - it is open to the Local Planning Authority to decide whether listing as an asset of community value is a material consideration if an application for change of use is submitted, considering all the circumstances of the case." This means that ACV listing can be used as a material planning consideration if desired – Brent has the power to say that they will give community assets real protection and make the ACV status recognised and valued within the DMP. A Pub Protection Policy is not specifically for heritage or rural pubs – CAMRA's model policy covers both rural and urban pubs. Brent has a number of significant historic pubs, some of which are locally listed by Brent for heritage reasons. It has been requested several times that The Queensbury be assessed to be placed on the local list of heritage buildings yet to date this has not happened. We therefore ask that this takes place before the publication of the final Plan.</p>				
<b>Council Response</b>				
A specific pub protection policy has been added to the DMP in response to comments.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.17	Robert Dunwell	QARA
<b>Comments</b>				
as comment 2.10; replace the words "affordable housing"				
<b>Council Response</b>				
It is acknowledged with new permitted development rights conversion can take place, without the need for planning permission, therefore the council will not have a mechanism to require affordable housing. Amended to clarify the council's preferred alternative use is affordable housing.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Town Centre Design and Infrastructure	DMP 4	Anne Clements	Quintain
<b>Comments</b>				

Overall, we support the policy to deliver a pleasant and accessible town centre environment. However, as drafted, both the supporting Access provision for rear servicing can be text and the policy wording encourage rear servicing. 'land hungry' leading to the inefficient use of land at ground floor level. A variety of servicing strategies are available including servicing pads which are being used on the Wembley Estate. Rather this being prescriptive on the form of servicing, the policy should allow the flexibility to use a variety of servicing strategies providing they do not materially worsen traffic congestion or vehicle / pedestrian conflicts. The policy should be amended to allow for this increased flexibility.

#### Council Response

Servicing standards are now contained in the Transport chapter/parking standards and accompanying strategy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Town Centre Design and Infrastructure	DMP 4	Anon	Anon

#### Comments

Halal butchers load dead animals via the front of the shop, something that is never done by non halal butchers. I find the sight of dead animals hanging from an open van parked outside a halal butcher shop deeply distressing.

#### Council Response

This is outside of the scope of the Development Management Policies. Planning permission cannot be used to control the display of produce.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Town Centre Design and Infrastructure	DMP 4	Cllr Janice Long	N/A

#### Comments

Care should be taken in granting permission for community use in retail areas. Too often they are taken by religious groups and you end up with a building that is shut during normal hours, often with shutters (212-214 Church Road) or that is open in the evening and causes noise nuisance to residential units, corner of St Mary's Road/ Craven Park Road. These establishments also cause parking issues especially when they are open in the evening after the hours of operation of any CPZ. They often do not cater for the local population.

#### Council Response

Policy in the DMP protects a proportion of primary frontage for retail and professional and financial services, and requires active frontages to be maintained. Policies in the transport chapter and general amenity policy will be applied to ensure development does not result in negative impacts on the transport network.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Town Centre Design and Infrastructure	DMP 4	Sarah Chaudhry	Property and Projects Team, Brent Council

#### Comments

Shop-fronts we welcome that the design should be complimentary of the wider area.

#### Council Response

Noted.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
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Chapter 2: Town centres	Town Centre Design and Infrastructure	DMP 4	Robert Dunwell	QARA
<b>Comments</b>				
additional para. g to read, "Free standing pavement signage for business operations behind frontage operations / shops will be allowed subject to survey and any appropriate respective conditions".				
<b>Council Response</b>				
Noted. The Shopfront and Advertisement SPD will contain detailed guidance on advertisements.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Town Centre Design and Infrastructure	DMP 4	Anne Clements	Quintain
<b>Comments</b>				
Overall, we support the policy to deliver a pleasant and accessible town centre environment. However, as drafted, both the supporting Access provision for rear servicing can be text and the policy wording encourage rear servicing. 'land hungry' leading to the inefficient use of land at ground floor level. A variety of servicing strategies are available including servicing pads which are being used on the Wembley Estate. Rather this being prescriptive on the form of servicing, the policy should allow the flexibility to use a variety of servicing strategies providing they do not materially worsen traffic congestion or vehicle / pedestrian conflicts. The policy should be amended to allow for this increased flexibility.				
<b>Council Response</b>				
Servicing standards are now contained in the Transport chapter/parking standards and accompanying strategy.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.19	Anon	Anon
<b>Comments</b>				
Enforce this policy! the current design guide is usually ignored by shop front owners. Make it enforceable to a: limit the size of 'A' boards, and b: to ensure that they are placed appropriately on a pavement so as not to cause obstruction. some Councils have already enforced a limit on size and design - why shouldn't Brent?				
<b>Council Response</b>				
Noted. The Shopfront and Advertisement SPD will contain detailed guidance on advertisements.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.20	Robert Dunwell	QARA
<b>Comments</b>				
last sentence – replace "maintained" by "normally maintained". (reason; so as to give flexibility in individual cases).				
<b>Council Response</b>				
3.5 metres is to be maintained in accordance with the council's existing planning guidance on layout standards and this will be included in the shopfront design guide rather than the Plan. This is to ensure an accessible environment for all and allow the free flow of pedestrians. A cluttered street can cause particular issues for disability groups.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
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Chapter 2: Town centres	Market and Carboot Sales	DMP 5	Sarah Chaudhry	Property and Projects Team, Brent Council
<b>Comments</b>				
The policy works to protect markets, but these markets must be properly formed and the policy needs to be mindful of competition with existing shops and town centre policy. We would welcome liaison with license department to stop/regulate the use of occasional sale license being used to establish a market, In terms of comparable temporary market provision for markets which are being redeveloped, we would seek that comparable does not mean a like for like size as this would not always be possible.				
<b>Council Response</b>				
Policy DMP 5 includes criteria to ensure that when planning applications for new markets and carboot sales are determined consideration is given to their effect on centres and shopping provision. Comparable provision during the redevelopment of markets is strongly encouraged. Decisions will be made on balance on what reasonably constitutes appropriate comparable provision for a temporary period.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.22	Anon	Anon
<b>Comments</b>				
Please state how you are NOT providing suitable alternative space for a market at Willesden Green as the proposed market square is being dug up by Thames Water and will be unavailable before Xmas or even later possibly.				
<b>Council Response</b>				
The proposed policy has not yet been adopted, and can only be applied where planning permission is required. Utility providers are able to undertake certain essential works without the need for planning permission.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.24	Dilwyn Chambers	N/A
<b>Comments</b>				
Some churches and schools have quite extensive car parks that can be used for carboot sales. Excessive bureaucracy could deter them, although they provide useful social interaction and recycling possibilities. Where obstructive parking is nearby streets by customers is envisaged, the police (not the Council) should be encouraged to deter it. Does authority exist for collecting sellers details, where a criminal offence is suspected?				
<b>Council Response</b>				
It is the intention that the Management Plan is proportionate with the scale of activity and will not overly burden such organisations. It sets out the practical factors which need to be considered and should assist in organising a successful carboot sale. The Council's Regulatory Services Team can and do take action where there is evidence of a criminal offence, such as the sale of counterfeit goods.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.25	Robert Dunwell	QARA
<b>Comments</b>				
The sentence as written has no sound basis for purposes of decision or enforcement. At least, the word "excessive" here needs to be defined especially as to what comparison basis or regulation is to be used. E.g. "Excessive in relation to "what".				
<b>Council Response</b>				
Clarification added 'excessive in relation to the scale of the centre.' in paragraph 3.17				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.26	Robert Dunwell	QARA
<b>Comments</b>				
Can such “waiving” condition be cost effectively legally enforced.				
<b>Council Response</b>				
This condition is already currently applied by the council under saved UDP policy SH28, and enforced as required.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.27	Sarah Chaudhry	Property & Projects Team, Brent Council
<b>Comments</b>				
Can this also include occasional sale licenses to stop this being used as a route to create a new market				
<b>Council Response</b>				
This paragraph highlights in addition to planning controls, the council's licensing teams also manages proposals for new markets through its functions. Although planning and licensing share information and licensing are consulted on any planning applications, they are separate statutory processes which must be undertaken.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Visitor Accommodation and Attractions	DMP 6	Stuart Murray and Jonathan Aubrey	Transport for London
<b>Comments</b>				
TfL welcomes this policy requiring specific consideration of coach access for hotel proposals, as per London Plan Policy 6.13. However, we would also encourage specific reference to taxi and private hire facilities in addition to this. In paragraph 2.32, appendix C should be changed to appendix S and the word draft should be deleted from ‘Mayor’s draft Town Centre SPG’ as the adopted SPG was published on 17 July2014.				
<b>Council Response</b>				
Hotel parking/servicing standards are addressed in the Parking Standards Appendix. Reference to the Town Centre SPG and appendix updated to reflect its adoption during the DMP consultation process.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Visitor Accommodation and Attractions	DMP 6	Sarah Chaudhry	Property and Projects Team, Brent Council
<b>Comments</b>				
Welcome that “Brent's strategic hotel capacity is primarily located in Wembley”, but would still allow for strategic hotel accommodation outside Wembley.				
<b>Council Response</b>				
Hotel development could be located outside Wembley in accordance with the sequential approach as set out in the NPPF.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Visitor Accommodation and	DMP 6	N/A	Wembley National Stadium Limited

	Attractions			
<b>Comments</b>				
With respect to any future visitor accommodation and attractions in the Wembley area, we request that the policy requires that conditions are applied to ensure that: 1) Any public realms/ landscaped areas within such new development can be made safe and secure given the movement of people on event days 2) Adequate noise protection for any accommodation in proximity to the National Stadium 3) An appropriate event day transport policy is put in place in consultation with the National Stadium.				
<b>Council Response</b>				
Policy on public realm is included in the London Plan. Further detailed guidance will be included in the emerging Designing Brent SPD				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 2: Town centres	Paragraph	2.31	Dilwyn Chambers	N/A
<b>Comments</b>				
Relevance is not defined. Many residents who have more accommodation have it with people known or previously unknown to them. Categorisation does not seem necessary.				
<b>Council Response</b>				
The policy applies to applications for visitor accommodation only. Visitor accommodation does not have to meet the same spacing and amenity standards as residential accommodation. The purpose of the policy is therefore to ensure visitor accommodation is managed as such, and does not become permanent residential accommodation of an unsuitable standard.				

### Chapter 3: Built Environment

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	All Policies		N/A	Wembley National Stadium Limited
<b>Comments</b>				
As a matter of development policy, any proposed developments affected by the National Stadium should be required to demonstrate that they will not have a materially adverse effect on the safe and effective movement of people on event days. Accordingly, we submit that a further principle of "Safe movement of people" is added to DMP8 (Design Principles), DMP11 (Urban Greening etc) and DMP12 (Public Realm). Where any such development includes publicly accessible areas, it should be designed as to not impede significant crowd movements or cause any public safety concern.				
<b>Council Response</b>				
The Wembley Area Action Plan provides appropriate area specific policy related to development around the stadium. It is recognised that designs of spaces will have to take into account general day to day use as well as occasional event crowd use.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.4	Dilwyn Chambers	N/A
<b>Comments</b>				
I recall that in 2004 there was reference to a 'Design Review Panel,' but are unaware to what extent it has been consulted by the Council. If it includes architects, they may have significantly different views from the public and users of a building. Several recent local buildings have received adverse comments from the public, both before and after construction. Greater involvement of the public in assessing design quality and fitness for purpose both before and after construction should be attempted and awards made by architects treated by the Council with some care to avoid derision.				

**Council Response**

To support the achievement of high quality design the Council has started to use the CABE Design Review Panel, which has membership from a variety of disciplines including architects and urban designers. The suggestion of a Council Design Award and greater engagement of the public in assessing the design will be fed to the Design Team for consideration.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.7	Claire Craig	English Heritage
<b>Comments</b>				
An Archaeological Priority Area is an area where, according to existing information held on the Greater London Historic Environment Record, there is significant known archaeological interest or high potential for new discoveries.				
<b>Council Response</b>				
Noted				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.8	Robert Dunwell	QARA
<b>Comments</b>				
see earlier comments para. 1, regarding SPG 17 and SPG 5 not being fit for purpose, and the need to defer this DDMP until these at least have been up dated etc.				
<b>Council Response</b>				
Noted. It is agreed that both documents are dated in some respects. Work on replacement Supplementary Planning Documents has commenced and these will issued for consultation in 2015.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Urban Design	DMP 7	N/A	English Heritage
<b>Comments</b>				
English Heritage recommends that DM Policy 7 concerning Urban Design reflect the importance of relating positively to the historic environment in some way. The justifying text at paragraph 3.17 would ideally be contained in this policy from English Heritage's perspective. Otherwise, this might be achieved by introducing the importance of enhancing historic character into paragraph c.				
<b>Council Response</b>				
This issue has been removed from Policy in the DMP as it is considered it is sufficiently covered in the London Plan policies. In addition Policy DMP1 and DMP7 make reference to enhancing heritage assets and their setting.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment		DMP 7	Robert Dunwell	QARA
<b>Comments</b>				
replace "reflecting" with "normally reflecting"; add "at the same time without ruling out innovative and /or exemplar design".				
<b>Council Response</b>				
The NPPF states that planning policies on design should aim to ensure that developments respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The policy explanation in Paragraph 2.5 identifies opportunity for				



modern interpretations within a traditional context.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Urban Design	DMP 7 and DMP 11	Chris Colloff (Savills)	Thames Water
<b>Comments</b>				
<p>Page 19- Policy DMP7, Urban Design:</p> <p>Page 24- Policy DMP11, Urban Greening, Landscaping and Trees:</p> <p>Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to underground infrastructure and consideration should be given to this in the selection of species and location of new tree planting.</p>				
<b>Council Response</b>				
<p>The Council does not encourage the indiscriminate planting of trees and shrubs. The Planning Department has a dedicated arboriculture officer and landscape architect to assist in assessing planting schemes. It is in the long term interests of green infrastructure for the right species to be located in the right location. Otherwise it is potentially at threat for the reasons identified by Thames Water and from other property / utilities owners.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.11	Anon	Anon
<b>Comments</b>				
<p>One item I have noticed whilst using an electric scooter on pavements and crossing roads is that many apparently small hindrances are very difficult. EG a curb of more than 1" cannot be safely accessed by my small wheeled scooter - dips caused by sinking utility access points also cause the scooter to tip dangerously. It is important that all accessibility issues are actually checked by disabled people and not the officers as we have many issues which are not considered or even realised unless you experience them yourselves. e.g. never use round door handles! I am always happy to give my experience to the Council as I do this for tfl.</p>				
<b>Council Response</b>				
<p>It is recognised that the detailed design of schemes does need to take greater account of accessibility / use by a wider range of people. This is covered by a range of London Plan policies, plus specific standards particularly for housing development in meeting mobility standards.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.12	Anon	Anon
<b>Comments</b>				
<p>As many trees as we can fit in. Replace any that have died. give priority to cleaning our air. Also, planting of flowers should be supported.</p>				
<b>Council Response</b>				
<p>There are a number of policies in the London Plan and the DMP that seek retention of trees and provision of additional high quality green infrastructure in new development, e.g. London Plan Policy 5.10.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.12	Anon	Anon
<b>Comments</b>				
<p>I feel there is not enough emphasis if any on the provision of trees on private land Arups recent report highlighted the numerous benefits larger trees On conversions and new schemes of all types trees not scrubs should be designed into the scheme and act as a buffer and amenity value to the area. By this I mean schemes should contain numerous trees and in dense bundles rather than a odd tree in the middle of a car park.</p>				

PROPOSAL 1: Take on board as policy the recommendations and suggestions as set out in the Arup report of 2013

PROPOSAL 2: Where homes are being extended into the existing rear garden or on new development generally ensure that tall upright trees are planted along rear boundary

On existing properties whenever possible the rear boundaries should be replanted with tall upright type trees to recreate what was common when the area was developed from farmland

#### Council Response

The Council recognise the benefits that large trees can bring to the built environment. However Brent has a varied mix architectural styles and urban design and it would not be appropriate to require large trees for all types of development. Where development allows space for larger trees of native species such as London Plane and Oak will be sought. London Plan Policy 5.10 requires all development to contribute to urban greening and the Council's landscaping and trees will be protected. This is considered to be in accordance with NPPF para 58 which states that Planning policies should aim to ensure that developments are visual attractive as a result of good architecture and appropriate landscaping.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Design Principles	DMP 8	Brent Friends of the Earth	Brent Friends of the Earth

#### Comments

In respect of tall buildings we believe that it is particularly important that the height should not significantly exceed that of other buildings in the area. Buildings of over 12 stories overshadow the surroundings and can create a risk of bird strike. The general statement in planning policies that tall buildings should conform to the layout of the local area and be of good design has not been sufficient to deter the approval of the 26 storey buildings in Barnet, adjacent to the Welsh Harp SSSI and the Brent border. In our view the reference to tall buildings, item f, should include the need to conform with the local skyline, as well as be of good design.

#### Council Response

The London Plan Policy 7.7 gives a London wide approach to Tall Buildings which in Brent has been supplemented by the Wembley Area Action Plan. Other tall developments will be considered within the parameters of the London Plan policy, taking account of local circumstances and good practice documents, plus any future locally relevant design guidance set out in the new SPD17

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Design Principles	DMP 8	N/A	English Heritage

#### Comments

English Heritage is not clear what is meant by 'strategic context' in paragraph a. of DM Policy 8 concerning scale of development. English Heritage would welcome consideration of the setting of heritage assets when determining the scale of development. English Heritage notes in relation to DM Policy 8(f) that exceptional design is not always sufficient to avoid causing substantial harm if a tall building is poorly located in relation to heritage assets and their settings.

#### Council Response

This policy has been removed. It is considered that existing policy within the London Plan provides sufficient policy in respect of design. Consideration of the impact on heritage assets is dealt with in the revised policies in DMP7.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Design Principles	DMP 8	Stuart Murray & Jonathan Aubrey	Greater London Authority

#### Comments

The design principles are generally supported, however, it is recommended that point (f.) be expanded to provide a more comprehensive policy approach to tall building development in accordance with London Plan Policy 7.7. Tall building proposals should include an urban design analysis that demonstrates the proposal is part of a strategy that meets the criteria set out in London Plan Policy 7.7

#### Council Response

This policy has been removed. It is considered that existing policy within the London Plan provides sufficient policy in respect of design.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Design Principles	DMP 8	Chris Colloff (Savills)	Thames Water

#### Comments

Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the water and wastewater infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as possible.

#### Council Response

Noted. Thames Water are consulted on proposals for all major developments and those which are over or close to sewers.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.13	Anon	Anon

#### Comments

ensure that all new developments have green roofs and walls and include plenty of trees and new planting. Also solar panels and triple glazing and glass that reflects heat to provide for cool in a very hot London. (as an example Wigmore Street last night was 4 degrees hotter than Regents Park!)

#### Council Response

There are a number of policies in the London Plan and the DMP that seek retention of trees and provision of additional high quality green infrastructure in new development, including green walls e.g. London Plan Policy 5.10.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.14	Simon Slateford	Fairview Homes

#### Comments

Paragraph 3.14 on density should reflect the guidance in the London Plan and Housing SPG which state that a rigorous appreciation of housing density is crucial to realising the optimum potential for sites but it is only the start of planning housing development, not the end.

#### Council Response

Density will be assessed on the characteristics of the site, including its PTAL rating, but also the surrounding current and future context.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.14	Robert Dunwell	QARA

#### Comments

this whole paragraph needs to be cross referenced to the respective "London Plan; Housing Density PTAL "sources.

#### Council Response

The Plan paragraph has been removed and the Plan no longer provides substantial comment on density.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.15	Robert Dunwell	QARA
<b>Comments</b>				
add, “but nevertheless each application should be considered under its own rights”.				
<b>Council Response</b>				
The Plan paragraph has been removed and the Plan no longer provides substantial comment on extensions to buildings. Locally specific guidance will be provided in additional documents where appropriate such as the SPD5, SPD17 and Conservation Area design guides.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.16	Robert Dunwell	QARA
<b>Comments</b>				
last sentence – Replace with, “ Tandem” developments (Backland housing sharing a frontage house access in the horizontal plane will not be permitted.				
<b>Council Response</b>				
The Plan no longer makes reference to tandem developments. Housing in back gardens has essentially been discounted as a source of supply. On this basis compared to national policy that was set out in PPG3 the pressure to develop on back gardens is somewhat reduced. Applications will be determined on their merits taking account of assumptions about supply and policy requirements.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.17	Anon	Anon
<b>Comments</b>				
See here the Queensbury redevelopment at Willesden Green which is not in keeping with the Mapesbury heritage value. The building design of the pub reflects the design of the estate and as a corner stone is of great value to delineate this estate. any 'back' redevelopment should be of a reasonable proportion and reflect it's character.				
<b>Council Response</b>				
The draft Development Management Policies set out the Council's preferred options for detailed policies which will be used primarily for the determination of planning applications for development in the borough. It is not the purpose of this consultation to consider the merits of existing planning applications and developments.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.18	Anon	Anon
<b>Comments</b>				
again, see the Queensbury proposed development which is considerably higher than surrounding areas and thus is not appropriate.				
<b>Council Response</b>				
The draft Development Management Policies set out the Council's preferred options for detailed policies which will be used primarily for the determination of planning applications for development in the borough. It is not the purpose of this consultation to consider the merits of existing planning applications and developments.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.18	Brent Friends of the Earth	Brent Friends of the Earth

Comments	Council Response

#### Comments

the height should not be justifiable simply by "good design", it should also conform with the skyline and nature of the locality

#### Council Response

The London Plan Policy 7.7 gives a London wide approach to Tall Buildings which in Brent has been supplemented by the Wembley Area Action Plan. Other tall developments will be considered within the parameters of the London Plan policy, taking account of local circumstances and good practice documents, plus any future locally relevant design guidance set out in the new SPD17

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.18	Robert Dunwell	QARA

#### Comments

SPD 17 Comments as before.

#### Council Response

Noted. It is agreed that both documents are dated in some respects. Work on replacement Supplementary Planning Documents has commenced and these will issued for consultation in 2015.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.23	Anon	Anon

#### Comments

Was this not considered when the new Council building was designed? Again, take disabled people around to see where there are issues like non-automatic doors and handles and... It is better to have a panel of disabled people to inform accessible design as without the disability yourself you cannot guess or imagine how you can be impacted.

#### Council Response

The draft Development Management Policies set out the Council's preferred options for detailed policies which will be used primarily for the determination of planning applications for development in the borough. It is not the purpose of this consultation to consider the merits of existing planning applications and developments.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Protecting Amenity	DMP 10	Simon Slateford	Fairview Homes

#### Comments

Policy DMP10 should not refer to "maximise" when referring to sunlight/daylight, but to ensure "satisfactory levels" of sunlight and daylight as stated in Policy DMP40.

#### Council Response

Reference to daylighting is in general terms in paragraph 2.5

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Protecting Amenity	DMP 10	Jennifer Cameron	N/A

#### Comments

This will mean, in practice, that only conservation areas stand any chance of keeping their green front gardens and hedges. Elsewhere, non-resident landlords will allow front gardens to become overgrown in order to justify paving them and turning them into car parks. This trend has gone too far already so there must be no further reductions in proportion of soft landscaping. Why is this exception being proposed when it robs the Council of revenue from on street parking and deprives the residents of the benefits at 3.36? Please consult your colleagues in enforcement about the impact of exceptions for small curtilages: if the space is too small for a car, it can have its wheels in the property and bonnet overhanging pavement and a row of wheelie bins on the pavement makes a colourful boundary marker. 3.39 implies that the Council intends to give up on enforcement outside (wealthy) conservation areas.

#### Council Response

Alterations to front gardens of dwelling houses outside of Conservation Areas can be made under permitted development without the control of the Local Planning Authority. Considering the other benefits of soft landscaping policy DMP12 criterion f) now seeks a 50% minimum of soft landscaping where permission is required. The ability to insist on 50% where the garden is already hard-standing is likely to be deemed as unreasonable, however the Council will in these cases encourage provision of soft landscaping. In addition to this the Council's Highways Department have introduced additional measures within the Domestic Vehicular Crossover Policy to secure soft landscaping in the front forecourt. Where appropriate the council seek to ensure that these interventions include the provision of small trees or boundary hedges. Crossovers and parking in the front forecourt are not permitted where there is not sufficient depth (< 5m) to accommodate a standard car

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Protecting Amenity	DMP 10	Chris Colloff (Savills)	Thames Water

#### Comments

The policy requires that development proposals should not result in unacceptable levels of odour or noise. However, consideration also needs to be given to the suitability of proposed developments in relation to existing land uses. Where development is being proposed within 15m of a pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a pumping station.

To ensure appropriate positioning of new development an additional requirement should be added to Policy DMP10 requiring:

“g) not be located where the amenity of future occupiers would be adversely affected by existing sources of noise, odour, vibration, fumes, dust or other air pollution.”

#### Council Response

These policies have been removed as it is considered they are covered sufficiently in the NPPF and London Plan. The issue of existing noise pollution for instance is addressed in London Plan Policy 7.15

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.32	Robert Dunwell	QARA

#### Comments

part of last sentence – Delete “and proposals for basements”; replace with “Depending on the location and siting and relative scale, domestic basement proposals may also here be included, although not as a general rule.”

#### Council Response

Reference to Considerate Constructors has been moved to the environmental protection section and is related to major developments.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.33	Robert Dunwell	QARA
<b>Comments</b>				
Delete this whole sentence as the wording and intent is outside the scope of this “planning” document. (Reason for example: This topic falls within the province of Building Control regulations and other Statutes (e.g. Party Wall Act),as do other structural / stability issues for other building development).				
<b>Council Response</b>				
This sentence has been deleted due to the restructuring of the document.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.36	Anon	Anon
<b>Comments</b>				
It is already law in London that front gardens should not be concreted over and yet this is not enforced except in conservation areas? why not? why is not required for all property owners to undertake a planning permission (simple) in order that they can change their front gardens - even when just renewing existing? this should also apply to all public and private developments of all types. The hard landscaping should be porous.				
<b>Council Response</b>				
It is not law that front gardens should not be concreted over. The loss of front gardens to hardstanding is a trend which is changing the character of many areas. However, the Council can only control situations which require planning permission. Policy DMP 12 dealings with car parking in front gardens (requiring 50% soft landscaping).				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.37	Anon	Anon
<b>Comments</b>				
Is this enforced? even with house extensions?				
<b>Council Response</b>				
Policy 5.10 requires each scheme to provide an element of urban greening. It is acknowledged that a greater priority should probably be given to this than is currently the case when granting planning applications				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Urban Greening, Landscaping and Trees	DMP 11	Brent Friends of the Earth	Brent Friends of the Earth
<b>Comments</b>				
Referring to new developments, item b, states, that the council will be “expecting” the protection and retention of good quality existing trees. We suggest that this is not definite enough and that it is made clear that good quality existing trees must be preserved and those of poor quality should be replaced (in the manner suggested in the rest of the paragraph) ,and, that additional trees should be provided wherever possible as well as in green areas. The Environmental assessment draws attention to the fact that Brent has too few green spaces and had no policy for actually increasing the number of trees in the borough.				
<b>Council Response</b>				
DMP 1 identifies in criterion h) that development will be acceptable provided it is...retaining high quality trees and landscape features..				



Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Urban Greening, Landscaping and Trees	DMP 11	Eleri Randall	Environment Agency
<b>Comments</b>				
We support the policy that all development should contribute to urban greening, in particular through DMP11 c. Providing living roofs and walls and the supporting text outlining their benefits.				
<b>Council Response</b>				
This policy has now been deleted but is covered by DMP1 related to green infrastructure and London Plan Policy 5.10.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Urban Greening, Landscaping & Trees	DMP 11	Blair Thorpe	N/A
<b>Comments</b>				
<p>I feel there is not enough emphasis if any on the provision of trees on private land Arups recent report highlighted the numerous benefits larger trees On conversions and new schemes of all types trees not scrubs should be designed into the scheme and act as a buffer and amenity value to the area. By this I mean schemes should contain numerous trees and in dense bundles rather than an odd tree in the middle of a car park.</p> <p>PROPOSAL 1: Take on board as policy the recommendations and suggestions as set out in the Arup report of 2013</p> <p>PROPOSAL 2: Where homes are being extended into the existing rear garden or on new development generally ensure that tall upright trees are planted along rear boundary</p> <p>On existing properties whenever possible the rear boundaries should be replanted with tall upright type trees to recreate what was common when the area was developed from farmland</p>				
<b>Council Response</b>				
<p>The Council recognise the benefits that large trees can bring to the built environment. However Brent has a varied mix architectural styles and urban design and it would not be appropriate to require large trees for all types of development. Where development allows space for larger trees of native species such as London Plane and Oak will be sought.</p> <p>Policy DMP1 plus London Plan policies provide the opportunity to seek appropriate planting of new trees on development sites.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Urban Greening, Landscaping & Trees	DMP 11	Sarah Chaudhry	Property & Projects Dept, Brent Council
<b>Comments</b>				
Agree with "b. expecting the protection and retention of good quality existing trees, mature shrubs and hedges that make a significant contribution to the streetscape and requiring detailed specification for new planting, promoting native species, and including like for like or a higher quality of replacement trees;"				
<b>Council Response</b>				
This policy has now been deleted but is covered by DMP1 related to green infrastructure and London Plan Policy 5.10.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Urban Greening, Landscaping and	DMP 11	Chris Colloff (Savills)	Thames Water

	Trees			
<b>Comments</b>				
Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to underground infrastructure and consideration should be given to this in the selection of species and location of new tree planting.				
<b>Council Response</b>				
The Council does not encourage the indiscriminate planting of trees and shrubs. The Planning Department has a dedicated arboriculture officer and landscape architect to assist in assessing planting schemes. It is in the long term interests of green infrastructure for the right species to be located in the right location. Otherwise it is potentially at threat for the reasons identified by Thames Water and from other property / utilities owners.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.39	Anon	Anon
<b>Comments</b>				
The policy on retaining, making & re-instating greenery to front gardens is not worded strongly enough. There must be no doubt that we do not want any more front drives converted to hard standing. The 50% limit should be changed to 25% hard standing only. The small gardens exclusion should be reversed - we do not want to see a small front garden converted to a car park space, the whole front garden must be green - it is so easy to achieve. very often we see the front garden converted to a car park with a token low quality planting area filled with rubble, then 100mm to top soil & turfed. This will obviously fail, so the topsoil depth should be 400mm & planting installed prior to the drive being used as a car park. Any planning submissions must include schemes to re-instate front gardens to greenery. This matter is not just for conservation areas as can be seen from the years of poor policy & enforcement by Brent that has resulted in whole streets devoid of greenery in what is a green suburb of London.				
<b>Council Response</b>				
The 50% is considered to be more realistic and appropriate taking account of the size of the majority of front gardens and the impact that planting can have even in a small place.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.39	Anon	Anon
<b>Comments</b>				
all very good but you need to enforce it.				
<b>Council Response</b>				
The NPPF para 207 states that "Effective enforcement is important as a means of maintaining public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of control." Brent Council have a pro-active Enforcement Team who investigate and where necessary take action against a wide range of breaches.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.39	Brent Friends of the Earth	Brent Friends of the Earth
<b>Comments</b>				
We suggest that all front gardens should have 50% soft landscaping whatever their size. There is also no mention of preserving existing gardens, i.e. not allowing the conversion of existing front gardens into hard standing, (mainly for car parking), or, of encouraging the conversion of hard standing areas back into soft landscaping.				
Apart from the advantage of "greening" areas increasing soft landscaping would help to reduce street flooding from run-off.				

Council Response				
This is addressed now in DMP 12 Parking criterion f).				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.39	Robert Dunwell	QARA
Comments				
Replace the words “front gardens” with “house frontage areas” throughout. No justification for the 50% figure is here given or referenced. Delete “50%”, replace with “30% to 50% and add the proviso “depending on the appearance and character of the overall green landscaped scheme”. (in practice and on appeal and in Public Inquiry it can be seen that a lesser than 50% scheme is visually acceptable, even in conservation Areas). Sensible Flexibility of approach is here needed.				
Council Response				
Disagree front gardens provides a clear term which is less ambiguous than house frontage areas. There is sufficient flexibility within the policy to allow varying designs and soft landscaping provision however soft landscaping in front gardens makes an important contribution to the character and appearance of the Borough while also ensuring natural run-off of water.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.41	Robert Dunwell	QARA
Comments				
1st part 1st sentence – Delete and replace with, “ All schemes, where different area/s of landscaping is/ are being altered will be expected to provide a development site with..				
Council Response				
Disagree. All schemes will be expected to contribute to soft landscaping of the Borough as set out in Policy 5.10 of the London Plan.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.42	Anon	Anon
Comments				
This policy should be split to have living walls as a separate discussion. A living wall is hard work to make & maintain. It will need an irrigation system & therefore to impose it is better to keep more open as an option in the mix of sustainability. However a living roof is easy to achieve & a sedum roof can be done with very simple irrigation rather than a system & can then be left as very low maintenance with watering only in prolonged drought. Therefore the policy should be that every flat roof on every proposal is a sedum roof or another type of living roof. since the weights of a sedum roof are low, this could also be used as a consequential improvement to existing flat roof unless proven otherwise by the applicant/or design team. Since it is cheap & effective this could be on of the most successful sustainability measures that is imposed in Brent's policy.				
Council Response				
The London Plan seeks living roofs from major developments and provides more flexibility for London boroughs on smaller schemes. Whilst green roofs undoubtedly have numerous benefits, they can be costly and for smaller developers are likely to be technically challenging. In the context of extensive permitted development rights for extensions which means that there is no obligation on those extending their properties to provide them, a policy that specifically requires them in minor developments in Brent is not considered appropriate and particularly one that focuses on a single solution, e.g. Sedum. However, where promoted by developers/property owners as part of meeting the London Plan 5.10 policy, the Council is likely to view them favourably.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
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Chapter 3: Built Environment	Paragraph	3.42	Robert Dunwell	QARA
<b>Comments</b>				
Although in principle the use of green roofs and living walls is to be encouraged the use of the words “all types and sizes” is seen here as being too prescriptive; alter the sentence so as to not be all encompassing.				
<b>Council Response</b>				
This has been removed. The London Plan seeks living roofs from major developments and provides more flexibility for London boroughs on smaller schemes. Whilst green roofs undoubtedly have numerous benefits, they can be costly and for smaller developers are likely to be technically challenging. In the context of extensive permitted development rights for extensions which means that there is no obligation on those extending their properties to provide them, a policy that specifically requires them in minor developments in Brent is not considered appropriate and particularly one that focuses on a single solution, e.g. Sedum. However, where promoted by developers/property owners as part of meeting the London Plan 5.10 policy, the Council is likely to view them favourably.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.47	Robert Dunwell	QARA
<b>Comments</b>				
This paragraph is far too generalised and needs specific detailed elucidation so as to be applied in the decision of planning applications – suggest another SPD or specific guidance notes. Again as with SPD 17 for example this specific information needs to be issued at least alongside this DDMP (see earlier comments) The use of this “catch-all” phrasing is inappropriate as it side lines the very real issue of structural movement / possible property damage in this changing climatic system.				
<b>Council Response</b>				
For the sake of brevity the level of detail previously in the document has been removed.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Public Realm	DMP 12	Claire Craig	English Heritage
<b>Comments</b>				
English Heritage appreciates the recognition of heritage in DM Policy 12, but would again encourage the borough to replace references to ‘character’ with ‘significance’ as this is the focus of heritage conservation in the NPPF.				
<b>Council Response</b>				
Noted. As part of the reduction in size of the document the Heritage policies have been rationalised. Significance is mentioned in Policy 7.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Public Realm	DMP 12	Robert Dunwell	QARA
Comments		Council Response		
last sentence – delete “or in Conservation Areas”. Add new sentence, “Likewise in Conservation Areas unless special circumstances apply (e. g. poor reception impacting on general usage availability to the detriment of community amenity, for example).		The policy has been deleted as it is considered it is sufficiently dealt with through NPPF and NPPG.		
Comments				

Council Response				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Public Realm	DMP 12	Anne Clements	Quintain
<b>Comments</b>				
Policy (g) as drafted is too prescriptive in that it requires advertisements to be ‘ ....located away from road junctions and pedestrian crossing points....’. The critical test should be the at advertisements are not put in locations which give rise to a safety hazard or create a distraction on to road users or pedestrians. This is not necessarily the same as being located ‘away from road junctions and crossing points’. The wording at the beginning of (g) is redundant and the policy wording should be redrafted to require adverts not to be placed in locations where they give rise t o adverse impacts on road safety.				
<b>Council Response</b>				
Noted. This policy has been removed as it is considered that it is sufficiently dealt with though NPPF and NPPG. Specific guidance on advertisements (for instance in association with Shopfronts) will be produced to supplement the national approach where necessary. The NPPG on Advertisements highlights the following places as locations where advertisements could be a hazard: junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Public Realm	DMP12	Stuart Murray & Jonathan Aubrey	Transport for London
<b>Comments</b>				
This policy makes reference to advertisements ‘being located away from road junctions and pedestrian crossing points where they could cause a hazard to road users or pedestrians’. Whilst a policy which takes the potential public safety impacts of advertising by highways is welcomed, not all advertisements in such locations will pose a hazard. Equally, there is potential for advertisements outside of these locations to be dangerous — for example outside schools. As such, it may be sensible instead to reference the government’s Planning Practice Guidance, which highlights locations where adverts could affect public safety and the types of advertisement that are most likely to do so.				
<b>Council Response</b>				
Noted. This policy has been removed as it is considered that it is sufficiently dealt with though NPPF and NPPG. Specific guidance on advertisements (for instance in association with Shopfronts) will be produced to supplement the national approach where necessary. The NPPG on Advertisements highlights the following places as locations where advertisements could be a hazard: junctions, roundabouts, pedestrian crossings, on the approach to a low bridge or level crossing or other places where local conditions present traffic hazards.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Public Realm	DMP 12	Brent Friends of the Earth	Brent Friends of the Earth
<b>Comments</b>				
This only requires a “Statement “ that safety standards will be met. This should surely be an actual condition of approval and should be subject to annual checks of public exposure. They should not be allowed on school buildings.				
<b>Council Response</b>				
This policy has been removed as the issue is sufficiently covered by NPPF and NPPG. NPPF 2012 paragraph 45 sets out the information required to justify a proposed development for telecommunications development. This includes <i>a statement that self-certifies that the cumulative exposure, when operational, will not</i>				

*exceed International Commission on non-ionising radiation protections guidelines. Paragraph 46 of the same document states that LPA's should not seek to determine health safeguards if the proposal meets International Commission guidelines for public exposure.*

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.62	Claire Hewitt	N/A
<b>Comments</b>				
save Rutland Park Mansions from total dereliction...it was built in 1897 and is beautiful Victorian elegance sadly gone to seed..our borough needs these buildings to be cherished.. and what about Kilburn State cinema....mouldering away a grade 11 listed..make it into a mall and let us all enjoy it again in a new configuration...before it crumbles away.				
<b>Council Response</b>				
To have a building considered for statutory listing an application should be made to English Heritage for the a heritage asset to be added to The National Heritage List for England. The Gaumont State Cinema building is a Grade II* listed building which means it is a particularly important building of more than special interest. Any proposals for this building will need to protect its special character.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Heritage	DMP 13	Claire Craig	English Heritage
<b>Comments</b>				
<p>English Heritage welcomes the inclusion of DM Policy 13 concerning heritage. We recommend that the Borough refer to the ‘significance’ of heritage assets rather than their ‘historic value’ or ‘special character’, as this adjustment will better reflect the approach of the NPPF. For example, the NPPF seeks to conserve and enhance the significance of Registered Parks and Gardens of Historic Interest and their settings and this is not fully conveyed by DM Policy 13(i) at present. English Heritage particularly welcomes the reference, in paragraph 3.66, to the Borough’s work on developing a more detailed picture of the significance of its Conservation Areas. English Heritage considers that for Development Management Policies to be meaningful, they should amplify existing policy by drawing strongly on the evidence base to provide local nuance. We consider this especially important given the limited nature of the Borough’s built heritage resources and we would encourage the Borough to review its site allocations against its heritage assets and consider any additional specific policies that might be required to support development while conserving and enhancing Brent’s historic environment. Using Registered Parks and Gardens of Historic Interest as an example again, the Borough may wish to expand DM Policy 13(i) to cover any particular elements of the significance of the London Borough of Brent’s Registered Parks and Gardens (and their settings) that have the potential to be adversely affected by inappropriate development.</p> <p>Similarly, English Heritage wishes to advise that the Greater London Archaeological Advisory Service (GLAAS) is currently reviewing and revising London’s Archaeological Priority Area system to bring it up to date in terms of information held in the Greater London Historic Environment Record (GLHER) and to enable better understanding of heritage significance, and improved consistency and compliance with the NPPF. We therefore recommend that the Borough work with GLAAS to undertake a review of its Archaeological Priority Areas. This would involve a thorough refinement of the Archaeological Priority Areas and either deleting the Sites of Archaeological Importance or incorporating them within new priority areas. Please contact Sandy Kidd, Principal Adviser of GLAAS to discuss this matter further (Sandy.Kidd@english-heritage.org.uk).</p> <p>In addition, GLAAS recommend that the second sentence of Policy DM 13 h. be amended to read as follows: The council may require a desktop assessment and/or field evaluation to inform planning decisions likely to affect such assets and apply conditions to protect, investigate or better reveal their heritage interest.</p>				
<b>Council Response</b>				
<p>This policy has been substantially revised. Significance is now addressed.</p> <p>A comprehensive review of Heritage Assets is being undertaken by the Principal Conservation Officer. This will identify and update information on assets so that</p>				



greater consideration of impact of development can be undertaken.

The Principal Conservation Officer has been in contact with Sandy Kidd and work is progressing on this element of heritage assets.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Heritage	DMP 13	Simon Slateford	Fairview Homes
<b>Comments</b>				
Part a of Policy DM13 states that the Council will "only approve" developments which preserve and/or enhance the character or appearance of a conservation area. Part C states that the Council will "not approve" proposals that would detrimentally affect the setting of conservation areas. The phrasing of parts A and C of DM13 is binary and does not meet the specific requirements of paragraphs 133 and 134 of the NPPF. We therefore request that DM13 is reworded as follows: a. Only approve developments which preserve or enhance the character or appearance of the area, or where harm to the conservation area is outweighed by the public benefits of the scheme. b. Grant permission for demolition of a building or part of a building where it does not positively contribute to the character of an area, or unless the public benefits of the scheme outweigh the harm to the conservation area. The council will only grant permission where a full application has been submitted showing what is to be substituted; c) Not approve proposals which would detrimentally affect their setting , including alterations to the public realm and developments outside of the Conservation Area boundary, unless the harm is outweighed by the public benefits of the scheme.				
<b>Council Response</b>				
This policy has been substantially revised and does not contain the previous criteria.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Heritage	DMP 13	N/A	Make Willesden Green
<b>Comments</b>				
More weight should be given to the preservation of the characteristics of conservation areas within the DMP. The current policy states that a building in a conservation area cannot be demolished unless it is thought to be actively detracting from the look of the conservation area. Nobody could argue this of the current Queensbury building, yet Brent planning officers chose to ignore it when they recommended demolition. The policy should therefore be given more emphasis in order that it is not easily overridden. There should be a formal restriction on the height of buildings within a conservation area.				
<b>Council Response</b>				
Noted. The policies in the section have been rationalised for the sake of brevity. A generic approach to building heights in conservation areas is not considered appropriate. A programme of review of conservation areas will highlight specific characteristics of the conservation areas that give it its special characteristics. Until that time existing policy and professional judgement will be used to determine the appropriateness of development.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Heritage	DMP 13	Matt Fielding	N/A
<b>Comments</b>				
I welcome the policy to protect conservation areas. However, deciding what constitutes "positive contribution to character and appearance" is highly subjective and I would welcome the council to provide further clarity on what this means – which incidentally could also help the planning committee reach decisions easier. I'm not an expert here and would revert to others, but examples could be a) high rise buildings in a conservation area, b) replacement buildings only where they offer a similar architectural design / frontage, c) replacement buildings that consider disability access (as outlined in DMP 9), d) absolute clarity that these standards remain irrespective of how close a development might be to a conservation area boundary (I saw one planning officer during an inspection outlining how close the boundary was for a high rise development in a conservation area, as she outlined other high rise developments in the surrounding area (outside the boundary) – which just seemed to be bordering the realms of impartiality), e) applying at least the same standards to major developments as you would do				



individual housing. I welcome the point about assessing local views.

I would like to see whether the council will apply a particular weighting to the consultation process (after all – the point is to consider the electorate’s views on issues that matter to them). I heard one councillor say that “only people who complain respond to consultations”, which I hope is not a view that is shared across the council! Moreover, although I recognise that the electorate vote their councillors in to make a difference on their behalf; if the council wants people to be more active in their communities then this is surely one way of showing them they are here to listen to residents views, not just when an election is coming up. After all, you can't have it both ways!!

#### Council Response

Further guidance will be provided in updated Conservation Area Appraisals and Management Plans to high the specific features that provide a positive contribution to the character and appearance of the areas.

Representations made on planning applications that relate to planning matters are material considerations in the determination of those applications.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Heritage	DMP 13	Sarah Chaudhry	Property and Projects Department, Brent Council

#### Comments

Agree with “k. There is a presumption against the demolition of Locally Listed buildings unless:

- i. significant community benefit can be demonstrated, and
- ii. the replacement building is of at least equal architectural quality to the building it replaces”

#### Council Response

This section has been revised so that development (which includes demolition) meet a number of criteria.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Heritage	DMP 13	Robert Dunwell	QARA

#### Comments

Conservation Areas, a – Delete the word “preserve”, replace with “do not harm” (Reason: the use of the word preserve is far too prescriptive and can lead to unintended consequences).

#### Council Response

Disagree. Preserve is set out in statue as the test. Notwithstanding this the policy has been amended and no longer contains preserve.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.64	Dilwyn Chambers	N/A

#### Comments

Some years ago the Council suggested that ten of the existing conservation areas should be de-designated, and consulted the residents for approval. There was overwhelming opposition, and the proposal went ahead. It is suggested that some form of legal protection is required in case such attitudes recur. At one time each conservation area had a consultative committee, perhaps they should be introduced to ensure that residents cannot be overruled by Council Officers.

#### Council Response

The DMP cannot set out guidance for reviewing conservation areas.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
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Chapter 3: Built Environment	Paragraph	3.68	Dilwyn Chambers	N/A
<b>Comments</b>				
In recent years at least four listed buildings have been demolished, most in order to developers. A stronger commitment is required; particularly where they are neglected.				
<b>Council Response</b>				
Policy on Brent's Heritage Assets has been strengthened.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.71	Claire Craig	English Heritage
<b>Comments</b>				
Sites of Archaeological Importance are listed in Appendix 1 [as revised with GLAAS].				
<b>Council Response</b>				
Consideration has been given to where Heritage Assets should be listed. Due to the changing information available, it is considered that reference to the website which will be updated more frequently than the Plan is the most appropriate place.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.72	Claire Craig	English Heritage
<b>Comments</b>				
Where development involving possibly harmful groundwork is proposed within an Archaeological Priority Area, or on any site where information or finds suggest there may be remains, a desktop assessment is required as a minimum, and field evaluation may also be necessary to inform decision-making. The advice of the Greater London Archaeological Advisory Service will be sought on whether groundwork is likely to be harmful bearing in mind the nature of the archaeological interest.				
<b>Council Response</b>				
Noted reference to the desktop and field evaluation has been added to paragraph 4.30				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.73	Claire Craig	English Heritage
<b>Comments</b>				
Where the desktop assessment and/or field evaluation suggests that development will have archaeological implications either a preliminary site investigation or a 'watching brief' will be required. The applicant will be required to employ a qualified field archaeologist (If A registered) to undertake the fieldwork, produce an appropriate report and archive. Opportunities will be sought to improve public understanding and appreciation of local archaeological heritage.				
<b>Council Response</b>				
Reference to field evaluation has been added to 4.30				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Paragraph	3.74	Claire Craig	English Heritage
<b>Comments</b>				
Priority will be given to preserving nationally important remains in-situ, applicants should consider this when assessing the development potential of a site. In appropriate cases, the most important archaeological remains and their settings should be permanently preserved which may necessitate redesign of the				

development or its foundations.

#### Council Response

Noted, this is set out in NPPF and NPPG as best practice.

## Chapter 4: Open Space

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Overall Chapter		Sarah Chaudhry	Property & Projects Dept, Brent Council
<b>Comments</b>				
<p>We would seek that the policy is revised to:</p> <p>Development on other open space will only be allowed in exceptional circumstances including where:</p> <p>c. it provides essential facilities to ensure the function, use and enjoyment of the open space; or</p> <p>d. as part of a wider development proposal there would be equivalent or better open space provision in terms of quantity or quality within the local catchment area.</p> <p>We would argue that fenced off/non accessible areas of open space should not be included (where these have no visual amenity), as we argue these do not have any public value which is the National Planning Policy Framework Definition of Open Space and would argue that these spaces are outwith the GLA's public open space categorisation requirements.</p> <p>In reference to the list of sites of open space, all school sites are not public open space and should be dealt with under other legislations. We request that these are removed from the Open Space of Local Value proposed list.</p>				
<b>Council Response</b>				
<p>It was considered this policy repeats NPPF paragraph 74. DPDs should add locally relevant policy and not duplicate national policy. Accordingly the policy has been amended to prevent duplication and instead refers to the NPPF in supporting text. Amendments to open space designations have been considered in light of comments.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Paragraph	4.2	Cathleen Munonyedi	N/A
<b>Comments</b>				
<p>I would advocate cross-referencing the Open Space policies and pre-amble with the adopted All London Green Grid</p>				
<b>Council Response</b>				
<p>Specific reference has now been added to open space integrating with the existing green infrastructure network. Supporting text clarifies this includes the All London Green Grid.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Paragraph	4.3	Russell Butchers	Canal and River Trust
<b>Comments</b>				
<p>Additionally, at part 4.30 where it states "Developments should be designed with regard to the guidance set out in Under Lock and Quay: Reducing Criminal Opportunity By Design (British Waterways, 2000)" this should be amended so that it includes reference to the Town and Country Planning Association's Policy Advice Note Inland Waterways (2009). This document should also be referenced within the Evidence Base for policy DMP16.</p>				

Council Response				
This guidance provides guidance on policy writing. Although useful background for the drafting of this policy, it is not felt necessary to refer developers to the guidance.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Protection of Open Space	DMP 14	Eleri Randall	Environment Agency

Comments				
We are generally pleased to see the provision of open space in this policy and in particular with regard to mitigating and adapting to climate change. We recommend under paragraph 4.3 any green grid strategy draw upon the All London Green Grid (ALGG) and ALGG Area Frameworks.				

Council Response				
In taking forward a Green Grid/Green Space Strategy the Council will draw upon the All London Green Grid (ALGG) and ALGG Area Frameworks.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Protection of Open Space	DMP 14	Heidi Clarke	Sport England

Comments				
The text preceding Policy DMP 14 (Paragraph 4.4) repeats the criteria of Paragraph 74 of the NPPF which is positive, however Sport England recommend that paragraph 4.4 of the Draft policy make it explicit where in the NPPF that the criteria has been taken i.e. Paragraph 74 of the NPPF. Sport England supports Policy DMP14				

Council Response				
Agreed. It was considered this policy repeats NPPF paragraph 74. DPDs should add locally relevant policy and not duplicate national policy. Accordingly the policy has been amended to prevent duplication and instead refers to the NPPF in supporting text.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Paragraph	4.7	Dilwyn Chambers	N/A

Comments				
My understanding is that a decision has not yet been made as to how parks and cemeteries will be managed when they are shortly privatised. An assurance is sought that byelaws will be strongly enforced, as they are not at present. The Council is not a member of the Open Space Society, who are at present considering the legal position if the public are prevented from using sections of parks by being fenced off. Advice could usefully be sought.				

Council Response				
Comments do not relate to DMP, however, comments will be passed to the Parks Department.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Enhance Biodiversity & Access to Nature	DMP 15	Eleri Randall	Environment Agency

Comments				
We support paragraph 4.22 that developments should be designed with an understanding of their wider context viewing the promotion of nature conservation as integral to the scheme not as an 'add on'. We also support paragraph 4.24 in relation to non-native species. Giant Hogweed is a health and safety issue in public open space as much as an environmental issue and the London Borough of Brent does have a substantial amount of invasive species.				

Council Response				
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Noted.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 3: Built Environment	Enhancing Biodiversity and Access to Nature	DMP 15	Brent Friends of the Earth	Brent Friends of the Earth
<b>Comments</b>				
In DMP 15 we would like some reference in the opening statement as to Brent's Biodiversity Action Plan and its implementation.				
<b>Council Response</b>				
London Plan Policy 7.19 makes reference to Bio-diversity Action Plans and sufficient reference is made in the policy explanation for DMP8 to Brent Biodiversity Action Plan.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Paragraph	4.26	Dilwyn Chambers	N/A
<b>Comments</b>				
The Blue Ribbon network is not defined in appendix 4.				
<b>Council Response</b>				
A clearer definition of Blue Ribbon Network is now included in text.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Paragraph	4.26	Dilwyn Chambers	N/A
<b>Comments</b>				
A section of the Jubilee Line railway between Kingsbury and Wembley Park appeared at one time to be protected in some way, perhaps there are other examples on railway property other than sidings.				
<b>Council Response</b>				
Many railway sidings also form wildlife corridors. These are identified on the policies map and will continue to be protected as such.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Paragraph	4.27	Brent Friends of the Earth	Brent Friends of the Earth
<b>Comments</b>				
The para 4.27 suggests that the Plan visualizes improvements through new development and does not mention clearly that action will be taken by the council for the benefit of existing sites.				
<b>Council Response</b>				
London Plan policy and the Brent's Local Plan seek to protect open space and secure enhancements. London Plan policy 7.18 requires development to contribute to achieving targets in Biodiversity Action Plans. Brent's BAP includes detailed actions for the enhancements of specific sites.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Paragraph	4.28	Eleri Randall	Environment Agency
<b>Comments</b>				

In paragraph 4.28 we are pleased to see the six sites identified for improvement however this should not exclude or underestimate allocating much needed resource to existing sites such as the Welsh Harp or the Brent River Corridor as they also require much needed improvements. We would like to see further commitment to a plan to achieve and deliver for the River Brent and its tributaries, with reference to Community Infrastructure Levy (CIL) funding being used to help to achieve outcomes. CIL is referenced in this document in DMP45 paragraph 10.13 to help fund schools but it could also be used for enhancement of biodiversity and for these sites. DMP

#### Council Response

The 123 list will sets out strategic priorities for CIL, which could include enhancements as set out in the Biodiversity Action Plan.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Waterside Development	DMP 16	Russell Butchers	Canal and River Trust
<b>Comments</b>				
The Trust welcomes a specific policy relating to waterside development (DMP16). The policy accurately differentiates between the Environment Agency requirement for an 8m buffer zone for rivers and that setbacks for canal side developments are to be established based on an assessment of character and context. The Trust considers that it should be clarified to demonstrate that in some instances no setback from the canal edge will be necessary, for example where the site is located on the offside of the canal (opposite the towpath side) where historically large industrial buildings rose sheer out of the canal. Policy DMP16 also does not make any reference to moorings, be it visitor or residential moorings. There is growing demand for both visitor and residential moorings within the canal network, including the provision of small marinas in appropriate locations. Moorings can add to the vitality and life of the canal whilst also providing a means of improved safety through natural surveillance. The policy should promote the provision of residential and visitor moorings in appropriate locations within the canal network. The Trust suggests that DMP16 could have an additional point f) that states "The Council will support the provision of residential and visitor moorings and facilities in appropriate locations within the canal network."				
<b>Council Response</b>				
London Plan policy 7.27 includes a requirement to protect and enhance moorings. As the London Plan forms part of the Development Plan the borough does not feel it necessary to repeat this policy.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Waterside Development	DMP 16	Claire Craig	English Heritage
<b>Comments</b>				
English Heritage notes that the Borough's canals and waterways often have heritage significance and we would welcome inclusion of this in DM Policy 16(b) alongside local distinctiveness.				
<b>Council Response</b>				
The Council has undertaken an assessment of heritage assets along the Grand Union Canal. Structures of significance have been identified for local listing and therefore will be covered under this policy rather than the Waterside Development policy. Parts of the Canal within Park Royal now fall within the Old Oak and Park Royal Development Corporation Area. As Local Planning Authority for this area the OPDC will undertake a similar review with input from English Heritage and Brent Council.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Waterside Development	DMP 16	Neil Impiazzi	SEGRO
<b>Comments</b>				
SEGRO supports the draft policy as worded and broadly supports improved pedestrian and cycle access to river and canal edges, which may be possible				

subject to land ownership, health & safety and secure by design constraints.

#### Council Response

Noted.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Waterside Development	DMP 16	Eleri Randall	Environment Agency

#### Comments

We are pleased to see naturalisation, restoration and setbacks mentioned in the policy and our requirements for an 8 metre buffer in the supporting text paragraph 4.30.

With policy a 'Proposals for development adjacent to river and canal edges are required to provide an appropriate set-back and appropriate landscaping of the set-back which may include public open space', we have some concern over the use of the words 'appropriate landscaping' as it should allow for habitat enhancement and include native planting with a fair balance between access for people and areas for wildlife.

There should be reference to the Water Framework Directive and its objectives in the policy wording for DMP16. We suggest that an additional point is added to highlight the need for development not to allow deterioration of any of the watercourses or to prevent WFD objectives from being achieved and promoting actions to deliver objectives identified for the water bodies in the London Borough of Brent in the Thames River Basin Management Plan, improving water quality and biodiversity. We would also recommend the supporting text include information on the status of the rivers and why they might be failing to achieve good status and what is needed to improve them. This is information we can guide you through at a meeting.

In paragraph 4.32 there is reference to the London Rivers Action Plan but there should also be reference to the Brent Catchment Partnership as a delivery partnership and the Brent River Corridor Improvement Plan. The plan includes specific objectives and is available from Thames 21

#### Council Response

Policy wording amended to state development will be required to seek to enhance water quality in accordance with the objectives of the Water Framework Directive. Supporting text has been amended to set out the status of the rivers, why they might be failing to achieve good status and what is needed to improve quality in line with the recommendations of the Thames River Basin Management Plan and Brent River Corridor Improvement Plan, produced by the Brent Catchment Partnership.

## Chapter 5: Environmental Protection

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Protection	Noise & Vibration	DMP 17	Neil Impiazzi	SEGRO

#### Comments

SEGRO supports the draft policy as worded, noting that appropriate noise attenuation, screening and design measures can often be successfully implemented to avoid acoustic conflict between employment and noise sensitive land uses.

#### Council Response

Noted.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Protection	Noise & Vibration	DMP 17	N/A	Wembley National Stadium Limited



Comments				
This policy should highlight that this is a particularly important concern in the Wembley area. Noise assessments and a high level of noise attenuation measures will be required as a matter of policy in respect of proposed developments affected by the National Stadium.				
Council Response				
Noted. Supporting text has been amended to include reference to the National Stadium. In accordance with the proposed policy development sensitive to noise will only be acceptable in proximity to the stadium if appropriate attenuation measures can be demonstrated.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Protection	Noise & Vibration	DMP 17	Anne Clements	Quintain
Comments				
There is reference within the Policy to Quiet Areas and then further reference is made in paragraph 5.11 to the identification of new Quiet Areas across the Borough. A number of areas currently considered to be Quiet Areas is listed and Quintain consultation to designate additional Areas.				
Council Response				
Noted.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Prot	Paragraph	5.12	Anon	Anon
Comments				
Brent has done little to reduce air pollution, other than planting a few trees. The air stinks. There has been no advertising of car clubs, no push to get people out of their cars and onto public transport. Brent has not been helpful, until very recently, with one of the car clubs in Brent, City Car Club. Brent was actually delaying allocating permits/bays for City Car Club, hence there is exactly one car to rent in Sudbury. The 182 bus is unmodernised and even when there is air conditioning available on buses on hot days the drivers rarely put it on, preferring to let travellers be uncomfortable on public transport. On Event days, which don't benefit the residents of Wembley at all, our air quality gets worse as for some unknown reason traffic gets worse. Why? There should be no available parking for private cars around the stadium.				
Council Response				
Brent Council has an adopted Air Quality Action Plan which sets out the measures the Council is taking to improve air quality. Policies in the transport chapter promote a modal shift to non-car modes, or where this is not possible car clubs.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environm Protection	Low Carbon	DMP 18	Brent Friends of the Earth	Brent Friends of the Earth
Comments				
No mention is made of what is probably the only way that Brent's air quality can be significantly improved, i.e. by extending the Low Emission zone. While this is a matter for the GLA we believe Brent should consider including in the policy statement the need for such a zone within Brent and expressing support for any extension of the existing zone				
Council Response				
The Development Management Policies are detailed policies to be used in determining planning applications. The policies cannot influence the extent of the Low				

Emission Zone, however, the Council will engage with the GLA in proposals to extend the zone.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environm Protection	Low Carbon	DMP 18	Brent Friends of the Earth	Brent Friends of the Earth
<b>Comments</b>				
No mention is made of what is probably the only way that Brent's air quality can be significantly improved, i.e. by extending the Low Emission zone. While this is a matter for the GLA we believe that Brent should consider including in the policy statement the need for such a zone within Brent and expressing support for any extension of the existing zone.				
<b>Council Response</b>				
The Development Management Policies are detailed policies to be used in determining planning applications. The policies cannot influence the extent of the Low Emission Zone, however, the Council will engage with the GLA in proposals to extend the zone.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Prote	Air Quality	DMP 18	Sarah Chaudhry	Property & Projects Dept, Brent Council
<b>Comments</b>				
Policy currently states that "Development likely to be used by people vulnerable to poor air quality should not be located in areas with existing very poor air quality, such as adjacent to the North Circular Road or other locations where air pollution is a recognised problem." The Bridge Park development is beside the North Circular – would seek assurances that Bridge Park is recognised as being suitable for development including hotel, housing, retail and leisure centre.				
<b>Council Response</b>				
Bridge Park is allocated for mixed-use development including residential. In accordance with London Plan policy 7.14 development proposals in AQMAs, such as Bridge Park, should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality such as by design solutions, buffer zones or steps to promote greater use of sustainable modes through travel plans. Policy wording amended to be consistent with the London Plan.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Protection	Paragraph	5.18	Anon	Anon
<b>Comments</b>				
Brent Council did not meet its last Air Quality Action Plan so it was extended for another year. That's hardly the sign of a council committed to improving air quality.				
<b>Council Response</b>				
Brent Council's Air Quality Action Plan is continually monitored and reviewed.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Prote	Paragraph	5.18	Anne Clements	Quintain
<b>Comments</b>				

It is presumed that the salmon pink colour sets out the extents of the AQMA but it would be helpful if this could be confirmed in the reference to Map 2 in paragraph 5.18.

#### Council Response

Noted reference added.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Prote	Contaminated Land	DMP 19	Eleri Randall	Environment Agency
Comments		Council Response		
Comments				
In addition to the maps included, we would expect to see reference to or a map indicating Source Protection Zones 1 and 2 within the London Borough of Brent. Our Groundwater Protection: Principles and practice publication (GP3) <a href="https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3">https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3</a> includes advice and position statements on the appropriateness of certain uses within these zones. It would be useful to mention in the justification text that certain uses may not be suitable within areas which are particularly sensitive to land contamination. Preliminary Risk Assessment (PRA) will be a required to be submitted with a planning application for sites which have the potential to be contaminated. PRAs are something we expect to see submitted with planning applications where there is a potential, or known risk of land contamination and we will often object if one has not been provided. The PRA needs to include information on past and current uses, if sensitive controlled waters receptors are present and if the site could pose a pollution risk. The PRA should also consider if any aspects of the proposed development could pose a pollution risk should contamination be present (i.e. deep drilling to facilitate the installation of foundation piles, site drainage). Further work such as an intrusive site investigation may be required depending on the findings of the PRA.				
Council Response				
Reference to Preliminary Risk Assessments has been added to supporting text. There are no designated Groundwater Source Protection Zones within the Borough of Brent.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Protection	Air Quality	DMP 19	Dilwyn Chambers	N/A
<b>Comments</b>				
Accepting that provision to park a car will result in a car being parked and that car will be used, a deduction in air quality will result. This is predictable. There appears to be no commitment elsewhere to reduce car use.				
<b>Council Response</b>				
Policies in the transport chapter encourage the use of sustainable modes over cars, and seek to limit car parking to what is reasonably required.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Prote	New Developms in Areas of Flood Risk	DMP 20	Eleri Randall	Environment Agency
Comments		Council Response		
Comments				

We have some concern over the lack of detail in this policy. Every development has ‘the potential’ to increase flood risk and therefore we suggest the change of wording to ‘Any development that contributes to flood risk (individually or cumulatively) will be resisted.’ However further detail is required here on how this will be achieved. The policy currently isn’t robust enough in assisting in reducing and mitigating flood risk in the London Borough of Brent as it isn’t going further or beyond the requirements in the National Planning Policy Framework.

The second part of the policy we also found unclear, as it is suggesting that if a site failed the sequential test flood resilience is required. The wording is not clear with regard to applying the Exceptions Test. There are Flood Risk Assessment requirements for safe development as well as safe access. Recommendations from your Strategic Flood Risk Assessment should be reflected here as well as aims in reducing flood risk, applying the sequential approach on site and protecting flood storage areas. We would also be happy to discuss this in more detail at a meeting.

#### Council Response

Text has been amended to provide greater clarity on the requirements of the NPPF and planning practice guidance. Specific reference to the recommendations of the SFRA and how this should inform site-based FRA has also been incorporated.

Chapter 5: Environm Protection	Paragraph	5.26	Robert Dunwell	QARA
<b>Comments</b>				
2nd sentence – Replace “hard surfaces” with “non porous hard surfaces”.				
<b>Council Response</b>				
This section has been reworded.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmental Prote	New Developms in Areas of Flood Risk	DMP 20	Chris Colloff (Savills)	Thames Water
<b>Comments</b>				
The reference within the supporting text to requiring all known sources of flooding, including sewer flooding, is supportive. However, new development which is not within the fluvial flood plain and which covers an area of less than 1 hectare could result in sewer flooding either on or off site if there is insufficient capacity within the existing sewerage network for any additional flows. This emphasises the importance of the additional proposed policy set out above. With respect to basement development, Part H of the building regulations recognises and Thames Water seeks to underline, the importance of the potential risk of basement flooding. For any basement development developers should be required to install suitable devices to prevent surcharge from the public sewer entering the basement this is often achieved by using positively pumped devices.				
<b>Council Response</b>				
It is considered the proposed policy repeats London Plan policy 5.14 Water Quality and Wastewater Infrastructure. The London Plan forms part of Brent's Development Plan, and therefore this policy is a material consideration in determining planning applications.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environm Protection	Paragraph	5.29	Robert Dunwell	QARA
<b>Comments</b>				
New Paragraph, say 5.30, that address the risk of pluvial flooding i.e. ground source (as para. 5.29 relates to fluvial flooding). In certain parts of the Borough this is becoming problematic – I can give specific details and methods of mitigation if required).				

Council Response				
DMP contains a specific section on surface water (pluvial) flooding.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 5: Environmt Protection	Surface Water	DMP 21	Eleri Randall	Environment Agency
Comments		Council Response		

Comments				
<p>We are pleased that SuDS and Greenfield runoff rates feature in this policy. We support the policy that development proposals on sites over 0.5 hectare should meet Greenfield runoff rates, however you must ensure that you as the Lead Local Flood Authority (LLFA) are set up to review these applications, as the Environment Agency will only review surface water on sites over 1 ha. As the LLFA, it is for you to decide what is appropriate and if local exceptions apply, for example any Critical Drainage Areas identified in your SWMP could have the requirement for SuDS to be part of all development. You should also clarify if it is undeveloped or developed sites that should achieve Greenfield undeveloped rates or both. We were happy to see both the Strategic Flood Risk Assessment and the Surface Water Management Plan referred to in the supporting text, we recommend you discuss any outputs or recommendations for Development Management policies from the SWMP with your colleague Hash Patel if you are not already doing so. We would expect the role of the London Borough of Brent as the LLFA to be identified as well as the SuDS Approval Body in the supporting text paragraph 5.33. It is critical in helping towards sustainable management of localised surface water flooding. This role will help the London Borough of Brent to be more resilient to future flood events and potential increased risks associated with climate change. As the LLFA there is an obligation for you to lead on Flood Defence consenting for ordinary watercourses and to ensure all works are compliant with the objectives of the Water Framework Directive, i.e. to prevent deterioration and to help progress heavily modified water bodies towards Good Ecological Potential so that they achieve this goal by 2027. Furthermore, for any works on main rivers, Flood Defence consents are issued by the Environment Agency however there is similarly an obligation for the Local Planning Authority to ensure that any developments affecting the river channel or riparian corridor also complies with WFD objectives (unless adequate justification is provided to satisfy WFD Article 4.7).</p> <p>We would also expect to see policies with aspirations towards deculverting, there should be some guidance as to the line you as the LLFA will take on deculverting Ordinary Watercourses with a commitment to deculvert watercourses or an investigation into the feasibility. Also more detailed guidance on Critical Drainage Areas and what the LLFA would expect to see in relation to Ordinary Watercourses.</p>				

Council Response				
The policy has been amended to reflect changes introduced on 6 April 2015 in relation to SuDS and the establishment of lead local flood authorities. Policy on the naturalisation of the blue ribbon network is contained in DMP policy on Waterside Development .				

## Chapter 6: Sustainability

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Paragraph	6.1	Stuart Murray & Jon Aubrey	Greater London Authority
Comments				
This paragraph lack clarity and would benefit from redrafting.				
Council Response				
Redrafted for clarity.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Paragraph	6.3	Brent Friends of the Earth	Brent Friends of the Earth
<b>Comments</b>				
refers to a combined Heat and Power Plant (CHP) to be provided in Wembley which is subsequently described as having approximately 30% lower emissions than would occur with separate generation of heat and electricity. While this statement may be correct the emissions from the generation of electricity depends entirely on the technology of the power unit and with some systems emissions could contain not only significant CO2 levels but also potentially toxic emissions and so would certainly not be suitable in a built up area				
<b>Council Response</b>				
Noted. 30% is an approximate figure taken from evidence in the London District Heating Manual. In addition to promoting CHP the London Plan Policy 5.2 sets requirements for reducing carbon dioxide emissions, and policy 7.14 requires development to be at least air quality neutral.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Paragraph	6.3 and 6.4	Stuart Murray & Jon Aubrey	Greater London Authority
<b>Comments</b>				
More guidance is needed as to whether decentralised energy or micro generation takes priority. Micro generation is discussed in the context of renewables. This could be confusing because gas-fired micro CHP exist and it is not renewable. • Allowable solutions requires its own paragraph, its inclusion in section 6.4 could lead the reader to assume it relates to micro/renewables in some way.				
<b>Council Response</b>				
The chapter has been restructured for clarity. Reference to micro-generation has been replaced with renewables.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Renewables and Decentralised Energy	DMP 22	Brent Friends of the Earth	Brent Friends of the Earth
<b>Comments</b>				
There is no clear reference to renewable energy, Item c only refers to on-site micro-generation. We suggest that reference be made to “renewable energy systems notably solar panels incorporating on-site micro-generation”.				
<b>Council Response</b>				
London Plan Policy 5.7, forming part of the Development Plan, requires major development proposals to provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Renewables and Decentralised Energy	DMP 22	Claire Craig	English Heritage
<b>Comments</b>				
In relation to DM Policy 22 concerning Renewables and Decentralised Energy, English Heritage welcomes the focus on connecting to renewable energy systems as this can be the optimal way of retrofitting historic buildings. English Heritage requests that buildings with heritage significance be encouraged to adopt our ‘Whole House Approach’ to retrofitting as research has shown that the government’s ambitions for carbon reduction in the built environment can be achieved				

through low impact measures for historic buildings. English Heritage has undertaken a wide range of research into retrofitting which can be accessed at [www.english-heritage.org.uk/your-home/saving-energy/](http://www.english-heritage.org.uk/your-home/saving-energy/) . We request that this policy (rather than simply the supporting paragraphs) identify that a specific approach is necessary to historic buildings to ensure that both elements of sustainability (i.e. carbon reduction and heritage conservation) are achieved. As the policy stands at paragraph c, it could encourage people to take an approach that is inappropriate and ultimately unsustainable due to the way it adversely impacts on heritage significance.

#### Council Response

The Council will apply London Plan Policy 5.7, forming part of the Development Plan, which requires major development proposals to provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible. Where it is proposed to install renewable energy systems on buildings of heritage significance, proposals will be assessed against relevant policy in the NPPF and Built Environment chapter of the DMP.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Renewables and Decentralised Energy	DMP 22	Stuart Murray & Jon Aubrey	Greater London Authority

#### Comments

The sustainability policies are particularly focused on decentralised energy with little regard to energy efficiency. The energy hierarchy that is specified in Policy 5.2 of the London Plan should be referred to. The hierarchy places energy efficiency before decentralised energy. 10. Policies should seek to maximise energy efficiency measures onsite for new developments. The Mayor's 'best practice', as set out in the Sustainable Design and Construction SPG 2014, is that developers should aim to achieve Part L 2013 Building Regulations requirements through design and energy efficiency alone, as far as is practical. It is suggested that the title be change from 'Renewables and Decentralised Energy' to 'Decentralised Energy and Renewables' to reflect the energy hierarchy.

- In part (a. UI.) CHP should be considered after discounting all other options.
- In part (b). the term 'micro-gen' is confusing, should this be renewables?

#### Council Response

The policy has been removed as it repeats London Plan Policy 5.2. Instead London Plan policy is cross referenced in supporting text. Clarification is included on the hierarchy and how it should be applied. Micro-generation has been replaced with renewables.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Renewables and Decentralised Energy	DMP 22	James Stevens	Home Builders Federation

#### Comments

We recommend that the Council considers the outcome of the Government's Housing Standards Review and accompanying Ministerial Statement of the 13 March 2014 and its Allowable Solutions consultation. This policy is unlikely to be conformity with the Government's emerging thinking on how applicants can meet the energy efficiency targets under Part L of the Building Regulations. The precise manner in which the relevant energy efficiency targets are met will be a matter for the developer to determine. This is unlikely to be a planning matter. Part B of the policy cannot prescribe that developments are 'required to maximise opportunities for incorporating on-site micro-generation'. The method an applicant chooses to meet the Building Regulations is a matter for him/her to decide. S/he may decide that the most appropriate and cost effective way to achieve the mandatory requirements for energy efficiency is through a combination of fabric efficiency and decentralised energy. The Council cannot prescribe this.

#### Council Response

The Council disagrees. London Plan policy, to which the DMP conforms with, sets out the Mayor's approach to achieving energy efficiency targets and establishes the energy hierarchy. The GLA are taking forward amendments to London Plan Policy 5.2 to take into account Allowable Solutions, but in all other



respects the policies are in conformity with the new technical standards. However, in light of amendments to London Plan policy 5.2 which in the first instance directs Allowable Solutions to the local area, it is no longer felt necessary for the Council to progress a separate Allowable Solutions policy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Renewables and Decentralised Energy	DMP 22	Neil Impiazzo	SEGRO
<b>Comments</b>				
<p>We refer to the recent Wembley Area Action Plan proposed main modification reference PMM15, consulted on in May and June 2014. Following the Inspector's Examination Hearing Sessions in March 2014, the word "must" has been replaced with "should" in terms of green roof and green wall provision. Draft policy DMP22 is similar to the pre-modification Wembley Area Action Plan draft policy in making it a requirement for applicants to use decentralised energy and to maximise opportunities for on-site micro-generation. SEGRO takes sustainable design in development and climate change very seriously and has a corporate design objective to aim for BREEAM Excellent and achieve a minimum rating of Very Good on all new build development. Making it a policy requirement rather than an aim, to deliver particular design measures or adopt particular strategies, can have unintended negative consequences in terms on preventing project initiation, implementation and occupation of development. Aside from cost and viability, policy DMP 22(iii) appears to be implying that developers should become energy producers and suppliers by developing a Shared Heating Network themselves, which is not their core business and is therefore unacceptable. SEGRO has experience of accommodating decentralised energy and district heating systems within its developments in London. We have found that there are very significant issues for investors and occupiers which must be addressed in order for a project to proceed. In particular, there must be a guaranteed, reliable, cost-efficient energy system for proposed buildings. It is therefore essential that developments come complete with their own systems rather than being required to rely only on common energy sources, which are less reliable. Anything less than this would result in a project not proceeding. Subject to viability, SEGRO would be prepared to install ducting to future proof buildings and enable a customer, at their discretion, to connect in the future.</p>				
<b>Council Response</b>				
<p>The policy has been removed as it duplicates London Plan Policy 5.6. Instead London Plan policy is cross referenced. Supporting text amended to conform with the approach set out in the Mayor's The London Heat Network Manual (2014), GLA.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Renewables and Decentralised Energy	DMP 22	Alun Evans	CgMS on behalf of Shurgard UK
<b>Comments</b>				
<p>The recent Wembley Area Action Plan (WAAP) proposed main modification reference PMM15, consulted on in May and June 2014 following the Inspector's Examination Hearing Sessions in March 2014, confirms the word 'must' has been replaced with 'should' in terms of green roof and green wall provision. Emerging Policy DMP 22 fails to reflect the guidance from the Inspector in respect of the WAAP Draft policy DMP22 is similar to the pre-modification Wembley Area Action Plan draft policy in making it a requirement for applicants to use decentralised energy; to maximise opportunities for on-site micro-generation; and to incorporate green walls /roofs.</p> <p>The viability implications of sustainable design are required to be addressed. Making it a policy requirement, rather than an aim, to deliver particular design measures or adopt particular strategies, is inconsistent with the NPPF Paragraph 21 and therefore cannot be considered 'sound'. A more flexible policy wording is therefore required to address this matter.</p>				
<b>Council Response</b>				
<p>The policy has been removed as it duplicates London Plan Policy 5.6 Decentralised Energy in Development Proposals and 5.7 Renewable Energy. Instead London Plan policy is cross referenced.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Renewables and Decentralised Energy	DMP 22	Anne Clements	Quintain
<b>Comments</b>				
As drafted the text of the policy and the supporting paragraphs (6.7, 6.9 and 6.10 in particular) suggest that a developer providing a decentralised or primary shared energy network should also make provision for future connection, including by third parties. This, if intended, is unacceptable, since it burdens the primary developer with unnecessary costs and land take above and beyond the costs of its own development. Further any contributions for connection are proposed to be paid to Brent Council in addition to any CIL liability (paragraph 6.9). Quintain requests the opportunity to understand the Council's intentions in this regard and to comment further. For example, it would seem sensible that any funds collected by the Council pursuant to the Allowable Solutions set out later in the document should be directed towards supporting the costs of a net work provided by the primary developer where it is facilitating connection by third parties. The Council's intentions for small residential developments with regard to micro-generation should also be clarified. The text of DMP22 (b) as drafted suggests an expense on development which could prohibit housing delivery and particularly affordable housing.				
<b>Council Response</b>				
Chapter revised to reflect policy requirements in the adopted London Plan and London Heat Network Manual, April 2014. The Manual sets out the approach to connecting to an existing and future heat network.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Renewables and Decentralised Energy	DMP 22	Robert Dunwell	QARA
<b>Comments</b>				
Delete "all". As is, is far too prescriptive / punitive).				
<b>Council Response</b>				
Text amended.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Paragraph	6.7	Stuart Murray & Jon Aubrey	Greater London Authority
<b>Comments</b>				
<p>The reference to the District Heating Manual for London (CLA, 2013) should be changed to 'The London Heat Network Manual, April 2014', here and elsewhere in this chapter.</p> <ul style="list-style-type: none"> <li>• Should reference be made to the need for an 'Energy Master Plan' for those major developments such as Wembley and South Kilburn? The sentence later on hints at this. Where a major development is proposed in an area..</li> <li>• Reference should be made to EMPs where these exist.</li> <li>• Please add the word 'feasible in '...not technically feasible or ..."</li> </ul>				
<b>Council Response</b>				
Reference has been updated to The London Heat Network Manual, April 2014. Reference to existing Energy Masterplans has been included.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
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Chapter 6: Sustainability	Paragraph	6.7	James Stevens	Home Builders Federation
<b>Comments</b>				
Secondly we note in paragraph 6.7 the requirement of the Council that applicants will provide a 'detailed feasibility statement' to establish the technical and economic feasibility of connecting to Decentralised Energy Networks (DEN). The Council cannot require this because the most appropriate method by which an applicant chooses to meet the energy efficiency targets under the Building Regulations will be a matter for him/her to decide. This will no longer a planning matter. Nevertheless, if the Council insists on such feasibility assessments it will need to factor the cost of this into its local plan viability assessment.				
<b>Council Response</b>				
Chapter revised to reflect policy requirements in the adopted London Plan and London Heat Network Manual, April 2014. The GLA are taking forward amendments to London Plan Policy 5.2 to ensure conformity with the new technical standards.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Paragraph	6.9	Stuart Murray & Jon Aubrey	Greater London Authority
<b>Comments</b>				
This section lacks clarity, it could allow developers to never install CHP and instead take the 'buy-out' option? The London Heat Network Manual provides planning guidance on this issue.				
<b>Council Response</b>				
Reference has been updated to The London Heat Network Manual, April 2014.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Paragraph	6.9	James Stevens	Home Builders Federation
<b>Comments</b>				
Paragraph 6.9 refers to a requirement for applicants to make a contribution towards the connection cost which will be secured through a legal agreement (in addition to any CIL liability). For these reasons described above, the Council cannot demand such a contribution enforced through a legal agreement, because it cannot insist that developers use DEN to meet the Building Regulations. Secondly, if the Council insists on such a contribution, it will need to include the cost of doing so in its local plan viability assessment.				
<b>Council Response</b>				
Chapter revised to reflect requirements in the adopted London Heat Network Manual, April 2014.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Paragraph	6.15	Robert Dunwell	QARA
Comments		Council Response		
Comments				
1st sentence – Delete “all” (reason : far too prescriptive / punitive as is.				
Council Response				
Text redrafted.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
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Chapter 6: Sustainability	Overheating and Cooling	DMP 23	Stuart Murray & Jon Aubrey	Greater London Authority
<b>Comments</b>				
Part 1. '...heat generation...' Does this mean 'heat loss' or 'heat demand'? • Part 2. Please replace'.. .entering...' with '...gain in...'.				
<b>Council Response</b>				
Redrafted for clarity.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 6: Sustainability	Allowable Solutions	DMP 24	James Stevens	Home Builders Federation
Comments		Council Response		
Comments				
<p>The policy is not in conformity with the Government’s thinking on how ‘allowable solutions’ can be delivered. The policy is contrary to national policy since it is too prescriptive in how Allowable Solutions can be provided. The policy is too prescriptive. The policy which requires that developers pay a contribution to Brent is not compliant with Government policy. We refer to the DCLG consultation document Next steps to zero carbon homes – Allowable Solutions: Government response and summary of responses to the consultation published in July 2014. This sets out the Government’s approach to Allowable Solutions and how this will be discharged. We refer to page 6. The Government has decided that house builders will have a choice of four routes to deliver the remaining carbon abatement above the onsite minimum level required by the Building Regulations from 2016 (see chapter 6). One option includes contracting with a third party to deliver carbon abatement measures sufficient to meet the zero carbon obligation, but it does not say that applicants have to pay into a local authority scheme. Applicants cannot be compelled down this route. Developers will also be allowed to deliver Allowable Solutions through a combination of the four options. How Allowable Solutions are delivered, therefore, is a matter for the developer to decide, not the Council. The policy cannot require applicants to demonstrate that ‘all feasible carbon reduction measures will be implemented on site’. Firstly, the most appropriate and cost effective route to meeting the Building Regulations is a matter for the applicant to decide. Secondly, the phrase ‘all feasible’ is vague. It is not clear what might constitute ‘all feasible’ avenues. There is a danger that it could be interpreted unreasonably and arbitrarily by the Council. The NPPF requires that local plan policies provide a clear indication of how decision makers should react to a development proposal (paragraph 154).</p> <p>The policy should be deleted. The supporting text in paragraph 6.18 should be re-drafted to include the following: The Council will establish and operate a fund that developers can choose to pay-into to assist them in meeting the energy efficiency standards in the Building Regulations. Supporting paragraph 6.19 should be deleted since London Plan policy 5.2 no longer conforms to Government policy.</p>				
Council Response				
<p>Chapter revised to reflect policy requirements in the adopted London Plan and London Heat Network Manual, April 2014. The GLA are taking forward amendments to London Plan Policy 5.2 to ensure conformity with the new technical standards and provide guidance on the implementation of allowable solutions.</p>				

## Chapter 7: Transport

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	All Policies		N/A	Wembley National Stadium Limited
<b>Comments</b>				
Any new development application in the Wembley area will need to acknowledge and work within the approved transport operations plan for Wembley Stadium.				

On Event Days, there are various transport management measures in place, including local road closures, frequent changes to the direction of traffic flow and wider on-street parking enforcement. There are also specific strategies in place to promote a high level of use of the three Wembley stations and high levels of pedestrian flows. These transport operation requirements, as approved by London Borough of Brent, will continue to be used by Wembley Stadium as part of its future business needs and should be fully accommodated. Accordingly we request that DMP25 and DMP26 are amended to superficially provide, as a matter of planning policy, that any new development application in the Wembley Area will need to acknowledge and work within the approved transport operations plan for Wembley Stadium.

#### Council Response

Whilst understanding the reasoning behind this approach, in practical terms its application is likely to be limited in impact due to their ability to not be applied retrospectively. Developments within the vicinity of Wembley Stadium are for the most part likely to be within the Wembley AAP with low levels of parking provision and primarily hotel or residential based, or reliant on public chargeable parking, e.g. Wembley LDO.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	All Policies		N/A	Wembley National Stadium Limited
<b>Comments</b>				
Any new development application in the Wembley area will need to acknowledge and work within the approved transport operations plan for Wembley Stadium. On Event Days, there are various transport management measures in place, including local road closures, frequent changes to the direction of traffic flow and wider on-street parking enforcement. There are also specific strategies in place to promote a high level of use of the three Wembley stations and high levels of pedestrian flows. These transport operation requirements, as approved by London Borough of Brent, will continue to be used by Wembley Stadium as part of its future business needs and should be fully accommodated. Accordingly we request that DMP25 and DMP26 are amended to superficially provide, as a matter of planning policy, that any new development application in the Wembley Area will need to acknowledge and work within the approved transport operations plan for Wembley Stadium.				
<b>Council Response</b>				
Whilst understanding the reasoning behind this approach, in practical terms its application is likely to be limited in impact due to their ability to not be applied retrospectively. Developments within the vicinity of Wembley Stadium are for the most part likely to be within the Wembley AAP with low levels of parking provision and primarily hotel or residential based, or reliant on public chargeable parking, e.g. Wembley LDO.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	All Policies		N/A	Wembley National Stadium Limited
<b>Comments</b>				
Any new development application in the Wembley area will need to acknowledge and work within the approved transport operations plan for Wembley Stadium. On Event Days, there are various transport management measures in place, including local road closures, frequent changes to the direction of traffic flow and wider on-street parking enforcement. There are also specific strategies in place to promote a high level of use of the three Wembley stations and high levels of pedestrian flows. These transport operation requirements, as approved by London Borough of Brent, will continue to be used by Wembley Stadium as part of its future business needs and should be fully accommodated. Accordingly we request that DMP25 and DMP26 are amended to superficially provide, as a matter of planning policy, that any new development application in the Wembley Area will need to acknowledge and work within the approved transport operations plan for Wembley Stadium.				
<b>Council Response</b>				
Whilst understanding the reasoning behind this approach, in practical terms its application is likely to be limited in impact due to their ability to not be applied retrospectively. Developments within the vicinity of Wembley Stadium are for the most part likely to be within the Wembley AAP with low levels of parking				

provision and primarily hotel or residential based, or reliant on public chargeable parking, e.g. Wembley LDO.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.1	Robert Dunwell	QARA
<b>Comments</b>				
3rd bullet point – delete reference to “reducing car parking standards for growth areas because of their relative accessibility” as being unfair and punitive to the existing residents and their existing properties / sites. Applying this draft proposal to new build developments will also detrimentally impinge upon existing residents and their ability of parking on street without having controlled Parking i.e. CPZ imposed.				
<b>Council Response</b>				
It is not agree that this is the case. It makes sense to reduce standards where a co-ordinated approach to travel planning on major developments occurs which will also present the opportunity to reduce parking standards and provide alternatives to private car ownership such as through car clubs. The bullet point in any case has been removed through the restructuring of the document.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.3	Dilwyn Chambers	N/A
<b>Comments</b>				
In summary: Cost is also a factor in determining the use of sustainable transport modes. Bus routes are increasing, but their length decreasing. Payment in cash is now refused. The Council makes no attempt to reduce adverse effects on bus or transport passengers, whilst making considerable efforts to increase the convenience for car users.				
<b>Council Response</b>				
Noted however the DMP cannot influence the cost of public transport, or how payments are made. The Council continues to regularly engage with Transport for London and London Buses to ensure the borough is well served by public transport. Disagree that the Council favours car users. The DMP transport policies seek to promote sustainable modes and limit car use.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.3	Anon	Anon
<b>Comments</b>				
If car ownership has decreased it's no thanks to Brent, who does not promote car clubs and is actually obstructive towards them, delaying giving out permits/bays. Recent new build blocks in Sudbury have no allocated car club bays, despite legislation that this should happen. The most effective advertising of car clubs in Brent is to have the cars available within sight of everyone, not miles away. It takes me 40 minutes to access a car from my car club, in a neighbouring borough.				
<b>Council Response</b>				
The purpose of the Development Management Policies consultation is to seek views on merging planning policies.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Transport implications of new develt	DMP 25	Anne Clements	Quintain
<b>Comments</b>				
The second paragraph under ‘Transport Assessment’ could be interpreted as being more onerous than the similar test set out in the last bullet point of				



Paragraph 32 of the NPPF. The policy should be reworded to make clear that development should only be prevented on transport grounds where the 'residual cumulative impacts of development are severe'.

#### Council Response

This policy has been removed as the issue is sufficiently covered by policies within the London Plan and the NPPF.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.10 and 7.11	Anne Clements	Quintain
<b>Comments</b>				
It should be made clear for consideration whether it is the Council's intention that contributions sought to mitigate the impacts of a specific development are drawn from CIL contributions or otherwise. In particular, the penultimate bullet point of paragraph 7.11 states that such highway improvements can be '...not necessarily restricted to the immediate development area....'. Whilst this may be a desire, the policy needs to be consistent with the three tests set out in paragraph 204 of the NPPF.				
<b>Council Response</b>				
The measures are now included in paragraph 8.8. Clearly these will be subject to the tests set out in legislation. There is no need for the DMP to make reference to this test for all of the potential mitigation measures/planning obligations sought.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.11	Robert Dunwell	QARA
<b>Comments</b>				
2nd bullet point – This bullet point should be deleted and if deemed necessary re-written with the following issues taken as a priority rationale; This current suggestion is generally unacceptable as it can very easily lead to the imposition (either directly or indirectly) of on street parking controls (e.g. CPZs) that existing residents have already rejected. At the very least, if such planning condition were to be imposed then it should not be imposed until the Council at its expense has re-consulted the development site's surrounding area as to whether or not residents wish the introduction of a Controlled Parking Zone (CPZ), or additional parking control if a CPZ already exists.				
<b>Council Response</b>				
The text highlights potential mitigation measures. The process of consulting on and introducing Controlled Parking Zones is outside the scope of the Development Management Policies.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.12	Stuart Murray & Jon Aubrey	Transport for London
<b>Comments</b>				
Although this policy is welcomed, paragraph 7.12 relating to travel plans ought to be reworded as at present it does not capture their purpose. A travel plan should not just focus on reducing car use and increasing bus use, but should more generally concentrate on facilitating the use of sustainable modes among occupiers and visitors from the outset of a development, helping to mitigate the impact of trips generated by the site. A reference should also be made here to TfL's travel plan guidance. This guidance also includes a case study of how to successfully integrate travel planning into the local plan making process and is available at <a href="https://www.tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans">https://www.tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans</a> .				
<b>Council Response</b>				
Agreed, but the policy now has been removed as Policy 6.3 addresses the need for travel plans. Paragraph 8.8 makes reference to travel plans and the TfL				



Travel Plan guide is referenced in national and London Plan policy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport		DMP 26	Robert Dunwell	QARA
<b>Comments</b>				
Last sentence – Refer to para. 6.2 above. For either deletion or major re-write.				
<b>Council Response</b>				
The policy has been removed as part of the restructure of the document as the issue is suitably covered in other London Plan and DMP policies.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.15	Robert Dunwell	QARA
<b>Comments</b>				
last sentence – Insert words, “large and medium” before “development”.				
<b>Council Response</b>				
Where appropriate all developments at public transport interchanges should contribute to improved access.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.16	Anon	Anon
<b>Comments</b>				
Firstly I feel the rules about too near schools etc are too much there are some kids and parents that are grossly overweight no matter what I feel this is more an education and lifestyle thing and could be better served by other policies. For example access to sports facilities easy and safety of walking for children and adults to school bike storage at home etc These are planning principles that should be pursued more than just some restriction on proximity to schools PROPOSAL: ensure bike storage and bike lanes/paths on all development Any new road etc should incorporate a bike lane				
<b>Council Response</b>				
London Plan policies and standards provide the appropriate policy basis on which to ensure promotion of cycling within developments occur.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport		DMP 27	Anne Clements	Quintain
<b>Comments</b>				
Quintain is fully supportive of the need to integrate public transport. However, as drafted, the policy is more demanding than the equivalent test in the NPPF where the last bullet point of paragraph 32 requires that development should ‘only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe’. The wording of the policy should not require development to deliver ‘betterment’ and should be reworded to be requirements of the NPPF.				
<b>Council Response</b>				
The policy has been removed as part of the restructure of the document as the issue is suitably covered in other London Plan and DMP policies.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.22	Stuart Murray & Jon Aubrey	Transport for London

Comments				
However, in its current context we would question whether paragraph 7.22 is relevant, given that the remainder of this policy section does not discuss air quality and it is stated that this is less of an issue for development.				
Council Response				
The reference to air quality and the North Circular has been removed from the transportation section.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.23	Robert Dunwell	QARA
Comments				
Reference needed for listing of “Heavily Parked Streets”.				
Council Response				
Agreed reference inserted which identifies the Heavily Parked Streets.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Cycling and Walking	DMP 27	Brent Cyclists	Brent Cyclists
Comments				
<p>While it is good that this paragraph calls for “design for cycle facilities to be in accordance with London Cycling Design Standards”, in fact all roads that are constructed within, or significantly impacted by, new developments, should, as a matter of course, have their standards raised to those in the London Cycling Design Standards: that is, they should either have separate, convenient and practical space for cycling incorporated in the design, or they should be planned to have both motor vehicle flows below 3,000 PCU per day, and 20mph speed limits. New routes expected to have in excess of 3,000 PCU per day on them must have separate cycle facilities that are continuous, safe, attractive, and not shared with pedestrians. This call is not sufficiently clear in the current wording of DMP 27, and needs to be strengthened. In addition, it should be stated that new developments must not have shared pedestrian and cycling facilities, but clear separation between modes, to minimise conflict and maximise efficiency for cycling.</p> <p>Major developments should be expected to contribute to improvements in links to and on the London Cycle Network whether the need for such facilities arises from the need to service the development or not. In other words, major developments should always have a component aimed at improving the cycle network in the area, which should be planned to meet the London Cycling Design Standards.</p>				
Council Response				
The policy has been removed as it is considered that existing policies within the London Plan Policy 6.9				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Cycling and Walking	DMP 27	James Stevens	Home Builders Federation
Comments				
We note the requirement for provision of minimum cycle parking. The Council will need to include the cost of this in its local plan viability assessment.				
Council Response				
The policy has been removed as it is considered that existing policies within the London Plan Policy 6.9				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Cycling and Walking	DMP 27	Stuart Murray&Jon Aubrey	Transport for London
Comments				

This policy makes reference to providing links onto the London Cycle Network. However, this should also reference the other networks of cycle routes across London, including Cycle Superhighways and Quietways. As well as providing cycle parking, developments should be required to provide on-site showers and changing facilities in order to encourage cycling. Reference should also be made to the Walk London Network and developments should be encouraged to improve both the quality of the pedestrian environment generally (for example, through submitting pedestrian audits with significant planning applications) and pedestrian legibility specifically.

#### Council Response

The policy has been removed as it is considered that existing policies within the London Plan Policy 6.9 sufficiently deal with this issue. The DMP makes reference to meeting London Plan cycling standards.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Managing the Highway Network	DMP 28	Anne Clements	Quintain

#### Comments

The test as set out in sub paragraph (c) of the policy is too onerous. The test should not be whether the proposal results in the loss of 'more than one space' but whether the residual impact of the development on transport grounds is severe. The policy should be reworded to be consistent with the last bullet point of paragraph 32 of the NPPF.

#### Council Response

The test is considered appropriate. In reality the majority of applications are likely to be associated with a single dwelling plot. For larger plots each case will have to be considered on its merits. Wider plots would probably have current on-street demand related to their existing use which would be absorbed into the development through the provision of off-street parking. This might reduce flexibility for other users in the street, but could well also reduce parking pressure through greater overall provision. In all cases the backstop position is that where the applicant can show that the loss of more than one space does not result in a severe impact they are likely to get consent.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Managing the Highway Network	DMP 28	Stuart Murray & Jon Aubrey	Transport for London

#### Comments

Paragraph 7.21 seems contradictory in the context of the rest of this section, with reference being made to adopting a 'more balanced approach' on the North Circular Road without 'the needs of car users dominating'. However, elsewhere in this section it is acknowledged that the road is an 'important route' and a 'key road link', helping keep traffic away from the rest of the borough and the rest of London. In order to best understand the current and future roles of the North Circular Road, TfL would recommend that consideration is given to its 'street type', in line with the recommendations of the Roads Task Force report. We understand that meetings between TfL and Brent are taking place in the coming months to discuss the RTF further, and the outcomes of these discussions could feed in to this section of the document. However, in its current context we would question whether paragraph 7.22 is relevant, given that the remainder of this policy section does not discuss air quality and it is stated that this is less of an issue for development.

#### Council Response

The two paragraphs have been amended and are now 8.17. Whilst it has a strategic transportation role, this does not stop Brent wanting to improve the quality of the route and create an environment that is more conducive to pedestrians and cyclists.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport		DMP 28	Robert Dunwell	QARA

Comments				
Simple works such as footway crossovers could also be constructed under Section 38 of the Highways Act 1980. The text should be reworded accordingly.				
Council Response				
The document relates to where planning consent is required. So this reference is not needed.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Movement of Goods and Vehicles	DMP 30	Anne Clements	Quintain
Comments				
Replace the word 'minimise' in the second sentence with 'reduce'. This change is considered necessary because the provision of servicing within the curtilage of a site can limit the quantum of development that is feasible on a site and can lead to an inefficient use of land. Subject to safety and environmental considerations, the policy should be reworded to allow more flexible servicing regimes such as service pads which are widely used across London.				
Council Response				
Minimise is used in relation to the movement of goods and materials by road. This is consistent with London Plan policy, specifically the need to promote movement of freight by rail and waterway, to relieve congestion within London.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Movement of Goods and Vehicles	DMP 30	Stuart Murray & Jon Aubrey	Transport for London
Comments				
Whilst this policy is supported, explicit reference should be made to Delivery and Servicing Plans and Construction Logistics Plans being secured as part of development proposals in order to encourage efficient and safe movement of goods during both construction and operation of sites.				
Council Response				
Reference to be added in the supporting text to this.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.24	Stephen Hall	Highways Agency
Comments				
We would request that a paragraph similar to para 7.24 relating to consulting TfL should be added to cover consultation with the Highways Agency as the M1 Motorway is in close proximity to the borough. Existing Paragraph for TfL 7.24 Proposals which would affect TfL's Strategic Road Network, which includes Edgware Road and Harrow/Watford Road corridors, shall require consultation with TfL which has a strategic management function in minimising congestion on such roads. Proposed additional HA paragraph 7.xx Proposals which would affect the Highways Agencies (HA) Strategic Road Network (SRN), which includes the M1 Motorway, shall require consultation with the HA which has a strategic management responsibility for operating, maintaining and improving England's strategic road network on behalf of the Secretary of State for Transport. The HA are concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.				
Council Response				
The section now contains mention of the need to consult the Highways Agency about impacts on the M1.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Paragraph	7.27	Stuart Murray & Jon Aubrey	Transport for London

#### Comments

At paragraph 7.27, where highway works are needed to make a development acceptable TfL would expect these to be secured via section 278 agreement only. Securing them via planning obligation as suggested could place either the Council or TfL at risk of needing to fill a funding gap, or of the gap not being filled and the development not being implemented as a result.

#### Council Response

The paragraph lists Brent's approach. Clearly if TfL is not prepared to be a signatory to a S.106 the improvement will be made through a S.278 agreement.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Parking	DMP 29	Anon	Anon

#### Comments

In the past you seem to have allowed parking on new build parking in what was once the rear garden this effects the visual amenity of the whole area It is the easiest and cheapest way for the developer but is not good for the area.

Whilst parking and off site parking is important the loss of communal kerbside for the sake of a cross over serving one private space should be considered Often the creation of a crossover can mean a loss of even two on street spaces. An on street space is shared and is thus more useable than a private space. On existing sites especial where the building is flats the "new" front garden space just means a loss of amenity value to the street Often more difficult access issues to the front door and restricted bin and bike storage areas -all for the sake of one car were the crossover has caused the loss of a communal space and more pressure on the remaining street spaces. An example of the problems is seen along Chichele road NW2 but look at the recent application for Flats 1-4 15 Chatsworth Road To get the bin stores and two cars the wall gone and only 8% soft landscaping remaining (14/2439) On new development the number of crossovers should be restricted to ensure there still remains kerb side parking This might appear radical but as stated above the crossover etc causes at least the loss of one kerbside space When you consider that the private space is usually only for the benefit of one flat owner who may be away for a week etc or not even have a car the rest of that building and the neighbours have lost a shared kerbside space that would be more useable MY strong radical suggestion is to longer permit crossovers in existing or new conversions where no crossover already exists. This would mean the front garden will be easier to accommodate the bikes and bins and still have some soft landscaping we would not lose the boundary wall and there would be one more revenue producing kerb side space

PROPOSAL: No more crossovers to existing flat conversions

PROPOSAL 2: Limit number of crossovers per household and the ensure sufficient gaps between crossovers to allow street parking

PROPOSAL 3: No converting rear gardens into parking spaces for residential conversions or new build

#### Council Response

The DMP requires developments to provide the minimum necessary car parking provision, and for opportunities for car free development to be explored. It also encourages the removal of surplus parking spaces. However, there will be situations where developments need to include car parking provision, for example in areas with lower levels of public transport accessibility. Public off-street parking, and therefore crossovers, will be permitted only where it is supported by a transport assessment and is shown to meet a need that cannot be met by public transport.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Parking	DMP 29	Brent Friends of the Earth	Brent Friends of the Earth

#### Comments

We suggest that parking policies have the potential to help reduce Carbon emissions from vehicles by introducing even higher charges for residential street

parking permits for cars with high CO2 emissions. This could be included in the DMP.

**Council Response**

Vehicle excise duty addresses this issue on a national level. The setting of charges for street parking permits is outside the scope of the DMP.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Parking	DMP 29	James Stevens	Home Builders Federation
<b>Comments</b>				
We note the requirement for electric charging points. The Council should include the cost of this in its local plan viability assessment.				
<b>Council Response</b>				
This a requirement of London Plan policy 6.13.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Parking	DMP 29	Brendan McRae	Macaire Enterprises
<b>Comments</b>				
We consider the policy should not differentiate between short and long stay parking sites, in that the point applies equally to long stay parking as it does to short stay. We request the policy should be amended to read: "The council will accept the loss of publicly available parking where this would not lead to under-provision of parking."				
<b>Council Response</b>				
In terms of promoting vitality and viability of town centres, the emphasis is essentially on providing sufficient space for relatively short term visitors to visit and undertake purchases/transactions in the centre. Long stay car parking is more likely to be associated with the needs of commuters who are more likely to travel at peak time, thus putting pressure on the wider highway network, and if undertaking a regular trip would be able to better plan their journey to not need to use the private car.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Parking	DMP 29	Sarah Chaudhry	Property & Projects Dept, Brent Council
<b>Comments</b>				
At what PTAL rating can developments not provide parking?				
<b>Council Response</b>				
Policy to be amended to clarify 'good or better public transport access' is equivalent of PTAL 4 or above.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Parking	DMP 29	Anne Clements	Quintain
<b>Comments</b>				



The Council's reference to the Wembley Area Action Plan at Appendix 2 is welcomed. Within the policy, however, the first sentence removes any flexibility to interpret the Borough Council's Parking Standards. It is at odds with the flexibility outlined in paragraph 6.20 of the AAP, which seeks an appropriate restraint on car use while recognising the need to promote successful regeneration. We suggest that the first sentence is either made redundant or that the words 'minimum necessary' are removed and instead the policy refers to 'as informed by a Transport Assessment'. The following text was agreed between LBB and Quintain to be added to paragraph 6.25 of the AAP: 'There may be exceptional circumstances where it can be demonstrated, for example for reasons of maintaining town centre vitality and viability, that there is a need for parking provision above that normally allowed by the maximum standards, subject to the usual transport assessment'. The same text should be included in the supporting text to Policy DMP29.

### Council Response

The Policy DMP12 now makes reference to providing parking consistent with the standards in Appendix 1. The policy also addresses potential for additional parking within town centres identifying where there is a deficiency of short-term public parking that, subject to development viability, the Council will seek additional powers within major development. This indicates the Council recognises that there may be situations where additional car parking above the normal requirements for the development within town centres is appropriate

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Parking	DMP 29	Stuart Murray & Jon Aubrey	Transport for London
<b>Comments</b>				
<p>The evidence base for this policy is a 2012 report on parking standards within the borough, carried out by Steer Davis Gleave. However, the range of issues considered within this report is disappointingly narrow and we are concerned that this does not provide a suitable robust evidence base. There is no consideration of congestion on the surrounding highway network, current or future trends in car ownership or car use, or other interventions that could be used to better manage or reduce car ownership such as the impact of car clubs, car sharing or wider implementation of controlled parking zones in the borough. Nevertheless, TfL supports the first part of this policy, where car free development will be considered in appropriate locations. However, it is slightly unclear where these locations are as the policy refers to 'good or better public transport access'. For the avoidance of doubt, it would be preferable to link this policy to Public Transport Accessibility Levels (PTALs), where 'good' would normally be considered to be a PTAL of 4 or higher. The second part of the policy then states that the parking standards in appendix 2 shouldn't be exceeded 'excluding spaces designated for disabled people'. However, the overall provision should be inclusive of these spaces and should not exceed the standards. If this wording is retained, in a number of cases it would mean parking standards exceeding those set out in the London Plan. At point (b) of the 'parking standards' part of this policy, electric vehicle charging points in line with London Plan standards should be 'required'. not 'sought'. Point C) of the 'managing the impact of parking' part of the policy then makes reference to development not being permitted where it would 'harm on-street parking conditions'. The level of harm is not defined and as such we would request that this is linked back to the concept of 'areas of on street parking stress' referred to earlier in this policy. We would also encourage the borough to introduce controlled parking zones in areas where significant amounts of development are anticipated (such as the area around Colindale) to help mitigate the impact of these developments on the highway network. Point (e) of this section then makes reference to development not being permitted where it creates a 'shortfall' of parking. TfL consider that this promotes a demand-led approach to parking policy and cannot support this. Part Cc) of the policy referred to above is considered sufficient to avoid the environmental impacts that would arise in this situation. Similarly, the final sentence in the 'parking in town centres' section of the policy should be removed. With respect to the detailed parking standards set out in appendix 2, although the employment standards set out in Table 12 do conform with the London Plan TfL would question why they have been banded according to their position relative to the Dudding Hill railway line rather than by PTAL. Although it is accepted that areas to the north of the line generally have less public transport accessibility this is not uniformly the case and there are a number of industrial locations in this area with higher PTALs where TfL would expect more restrained parking standards to apply. It is also concerning that the document proposes a more generous</p>				

standard across all opportunity and growth areas in the borough, making an explicit reference to Park Royal. Although the London Plan does allow for a more generous office standard in outer London areas to be adopted, it is expected that this will be justified in specific instances through a DPD. This has not happened here, and in particular the Park Royal OAPF and forthcoming Old Oak Common OAPF have identified issues with highway congestion in the area which must be addressed by adopting stricter car parking standards as part of a package of transport measures. As well as this, the employment parking standards also state those standards can be exceeded where only one of a range of criteria would be met. This does not reflect the number of strict policy tests that have to be met as set out in London Plan policy 6.13 that have been devised to ensure that there would not be unacceptable levels of congestion or pollution. Moreover, compliance with only one criterion could be relatively easy to achieve, thereby rendering maximum standards redundant. This portion of the standards should be amended to better reflect the requirements of the London Plan or removed. The retail parking standards as set out in Tables 13-15 are in accordance with the London Plan. However, the supporting text appears to contradict policy DMP2Y. This policy states that 'the maximum additional amount of parking provided by individual development [in town centres] shall be no greater than the maximum standard for freestanding development'. TfL considers this approach to be correct. However, the appendix states 'For town centres...additional parking requirements may be met through the provision of off-street parking with charges applied'. For hotel parking, the proposed requirement of one coach parking space per 100 bedrooms is not compliant with the London Plan, which requires one per 50 bedrooms. This approach should be justified. In addition, although the proposed car parking standards appear sensible the appendix states that these can be exceeded where there is no public car parking nearby. As the purpose of car parking standards is to discourage private car trips, the purpose of restricting parking only in cases where there is alternative parking available seems questionable. The requirement for student halls of residence to be car free is welcomed, but I would question why when this is the case car parking linked to the number of beds would be permitted for other residential institutions such as residential schools where demand for car ownership is presumably minimal due to the age of the students involved. For non-residential institutions and assembly and leisure institutions, the standard should presumably read as 'up to 1 car parking space should be provided...' to avoid this being read as a minimum requirement. The disabled parking requirements set out in Appendix 2 are not in line with Lifetime Homes standards for residential uses and for non-residential uses does not meet the standards set out in Table 6.2 of the London Plan. Whilst cycle parking standards are stated to accord with the London Plan, these are based on the standards set out in the Revised Early Minor Alterations. Further Alterations to the London Plan (FALP) have now been published in draft, and are likely to be in force by the time the DMP is adopted. As such, we would request that Brent revise these standards in line with FALP. It should also be noted that standards for CI uses are missing from the appendix.

#### Council Response

The Steer Davis Gleave study is considered by the Council to be a robust piece of work. DMP 12 has been amended to make reference to generally PTAL4 and above for implementation of car free development. Other opportunities may exist in areas with a lower PTAL but other factors prevail, e.g. extensive controlled parking zones. The reference to standards not being exceeded has been removed. The policy introduction indicates that London Plan Policy 6.13 applies in relation to cycle parking and electric vehicle parking spaces. A reference to heavily parked streets has now been added to the policy to provide greater clarity on areas with higher demand where development which adds to on-street parking demand will not be supported. Unless development will fund additional Controlled Parking Zones to address manage its transportation impacts, the Council will not make a commitment to introduce Controlled Parking Zones. The reference to shortfall of car parking is not seeking to encourage unnecessary parking provision and encourage car use. It reflects a position that even after all possible measures that have been pursued to push movement away from cars, the development is causing a need for car parking that cannot be delivered and that this will have a substantial adverse impact on the transportation network then it will be refused. In relation to employment parking standards there are no high PTAL employment areas within the north of Brent except for Wembley which has its own parking standards set out in an AAP. The coach parking has been amended in the standard to London Plan levels. The public car parking reference has been removed. There are no residential educational establishments in Brent. The standards for D1 and D2 have been changed to maximums. The disabled parking standards are considered appropriate, London Plan assumes 100% provision for wheelchair accessible units. Cycle parking refers to London Plan standards being required.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
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Chapter 7: Transport	Parking	DMP 29	N/A	Wembley National Stadium Limited
<b>Comments</b>				
With respect to DMP29, – any new development incorporating private car parking in the vicinity of Wembley Stadium should be subject to restrictions on the use of such car parking spaces by those attending events at the Stadium. This is to ensure the effective operation of event day transport measures.				
<b>Council Response</b>				
Whilst understanding the reasoning behind this approach, in practical terms its application is likely to be limited in impact due to their ability to not be applied retrospectively. Developments within the vicinity of Wembley Stadium are for the most part likely to be within the Wembley AAP with low levels of parking provision and primarily hotel or residential based, or reliant on public chargeable parking, e.g. Wembley LDO.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Parking	DMP29	Blair Thorpe	N/A
<b>Comments</b>				
<p>In the past you seem to have allowed parking on new build parking in what was once the rear garden this effects the visual amenity of the whole area. It is the easiest and cheapest way for the developer but is not good for the area.</p> <p>Whilst parking and off site parking is important the loss of communal kerbside for the sake of a cross over serving one private space should be considered Often the creation of a crossover can mean a loss of even two on street spaces. An on street space is shared and is thus more useable than a private space. On existing sites especial where the building is flats the "new" front garden space just means a loss of amenity value to the street Often more difficult access issues to the front door and restricted bin and bike storage areas -all for the sake of one car were the crossover has caused the loss of a communal space and more pressure on the remaining street spaces. An example of the problems is seen along Chichele road NW2 but look at the recent application for Flats 1-4 15 Chatsworth Road To get the bin stores and two cars the wall gone and only 8% soft landscaping remaining (14/2439)</p> <p>On new development the number of crossovers should be restricted to ensure there still remains kerb side parking</p> <p>This might appear radical but as stated above the crossover etc causes at least the loss of one kerbside space When you consider that the private space is usually only for the benefit of one flat owner who may be away for a week etc or not even have a car the rest of that building and the neighbours have lost a shared kerbside space that would be more useable MY strong radical suggestion is to longer permit crossovers in existing or new conversions where no crossover already exists. This would mean the front garden will be easier to accommodate the bikes and bins and still have some soft landscaping we would not lose the boundary wall and there would be one more revenue producing kerb side space</p> <p>PROPOSAL: No more crossovers to existing flat conversions</p>				
<b>Council Response</b>				
Duplicate see response above.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 7: Transport	Parking	DMP29	Robert Dunwell	QARA
<b>Comments</b>				
<p>Parking, throughout. – Replace occurrences of “development” with words “new development sites” Parking, 3rd para. – note must be taken of the amount of “Blue Badge abuse” that is widespread and real additional mitigation measures brought to bear before such allowances are given further. Delete the word “preserve”, replace with “Do no harm”, (Reason: existing is excessively prescriptive and unnecessary for overall aims). h – as above Delete the word “preserve” replace with “do no harm to”</p>				
<b>Council Response</b>				
It is considered development is appropriate in the context of the policy. 'Preserve' is consistent with the requirement in London Plan policy 2.18 to plan positively				

for the protection of green infrastructure, and as outlined in the NPPF the desirability of new developments making a positive contribution to local character.

## Chapter 8: Employment

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 8: Employment	Local Employment Sites	DMP 31	Sarah Chaudhry	Property & Projects Dept, Brent Council
<b>Comments</b>				
To consider conversion of fringe sites for Council priority uses such as for new schools.				
<b>Council Response</b>				
Policy wording amended to specify the release of surplus employment land will be subject to delivering significant benefits consistent with the wider objectives of the Development Plan, including social infrastructure such as for new schools.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 8: Employment	Offices	DMP 32	Sarah Chaudhry	Property & Projects Dept, Brent Council
<b>Comments</b>				
Confirm there will be no expectation to provide marketing evidence for the ex Unisys buildings at Bridge Park.				
<b>Council Response</b>				
The ex Unisys building forms part of Site Specific Allocation 20, therefore marketing evidence for this site will not be required.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 8: Employment	Affordable Workspace	DMP 33	N/A	CGMS Consulting on behalf of Costco
<b>Comments</b>				
The NPPF and the Council's economic evidence base have demonstrated the need for increased employment in the local area, and in addition access to training and up-skilling opportunities. It is considered that the affordable workspace policy would be in conflict with the objective of sustainable economic development as it would act as a barrier to growth and is likely to constrain job creation in the Borough. The provision of affordable workspace either on site or via financial contributions, has considerable implications for the future development of land for employment purposes in terms of scheme viability. The need to incorporate affordable units is likely to constrain site layout opportunities unnecessarily and prevent the development of sites that might be better served by large scale units. The artificial creation of local employment market conditions is also a concern, and it does not appear that this potential knock-on impact has been adequately assessed within the Council's evidence base. The aspirations to deliver floorspace that is affordable to start up businesses is acknowledged and supported in principle. However, the draft policy is counter-productive in terms of repelling potential investment and development focus to elsewhere in London.				
<b>Council Response</b>				
Policy wording amended to specify the release of surplus employment land will be subject to delivering significant benefits consistent with the wider objectives of the Development Plan, including social infrastructure such as for new schools.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 8: Employment	Affordable Workspace	DMP33	Neil Impiazzi	SEGRO
<b>Comments</b>				

SEGRO does not support this draft policy. Whilst SEGRO supports a planning policy framework that encourages the take up of business space by Small and Medium Sized Enterprises (SMEs), we are very concerned that enforcing this blanket policy would rather render industrial investment and development in Brent unviable. It is important to understand that the provision of affordable workspace, either on site or via financial contributions, has considerable implications for the viability of future development of employment land. Attempting to introduce units less than 100 square metres and 250 square metres on-site where there is demand for larger scale or alternative industrial floorspace will stifle investment in the Borough. This policy would constrain site layout opportunities, impact on viability and therefore the development potential employment land. As a long term investor and developer in London, SEGRO has a strong track record of delivering schemes that occupiers and the industrial market demand. The aspiration to deliver floorspace that is affordable for SMEs and start-ups is commendable but the draft policy is counter-productive. The goal of creating the affordable space for SMEs requires investment from the private sector but this policy will make certain schemes unviable and will only serve to discourage investment and development in the Borough. We also question how a developer can deliver a scheme viably with the knowledge that at least 10% of the scheme will be leased 50% of the market rent. We are concerned about the negative impact this will have on existing floorspace aimed at SMEs elsewhere in the Borough or West London. It could create a wholly undesirably sub-market and increase the vacancy level of existing floorspace, designed for SMEs, that is charging a more market facing rent. We believe that it is not the role of planning policy to try and artificially create, or inadvertently suppress, local market conditions and we cannot support the draft policy. Suggested amendment: For the reasons set out above, we suggest that draft policy DMP33 is deleted entirely. At the very least it is important that the words "subject to viability" remain within the policy as drafted.

#### Council Response

This policy has been removed. It is not the Council's intention to deter economic development. The Council will seek to secure affordable workspace through the redevelopment of Local Employment Sites, where the provision of uses such as residential can help subsidise the provision of affordable workspace.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 8: Employment	Affordable Workspace	DMP 33	Alun Evans	CgMS on behalf of Shurgard UK

#### Comments

Draft Policy DMP 33 is unsound as it is not:

a. Positively Prepared; b. Justified; c. Effective; or d. Consistent with National Policy Positively Prepared: The draft Policy is not supported by Shurgard UK Limited. In setting a minimum 10% of proposed floorspace as affordable, the policy does not expressly account for individual site circumstance. In particular, on-site provision will potentially compromise security/ function of a proposed facility and would potentially undermine consumer confidence in a self-storage facility. This policy requirement is therefore contrary to NPPF Paragraph 21 which states "Investment in business should not be over-burdened by the combined requirements of planning policy expectations.

The aspiration to deliver floorspace that is affordable for SMEs and start-ups is commendable, but the draft policy is not therefore positively prepared. The investment required to achieve the goal of creating affordable space for SMEs will not be attracted. Developers will redirect this investment into other London Boroughs.

We also question how a developer can deliver a scheme viably with the knowledge that at least 10% of the scheme will be leased at 50% of the market rent. We are concerned about the negative impact that this will have on existing floorspace aimed at SMEs elsewhere in the Borough or London. It could create a wholly undesirably sub-market and increase the vacancy level of existing floorspace caught without demand at market levels of rent. It is not the role of planning policy to try and artificially create, or inadvertently suppress, local market conditions, in conflict with the NPPF Paragraph 182 which requires the emerging development plan policy to be based upon an objectively assessed need. The emerging policy conflicts with the Council's Employment Land Demand Study (2013) which informs phased release of identified sites on the emerging Proposals Map and the commitment to release a further 7.5ha release of employment sites (in addition to those identified in the Proposals Map). The Employment Land Study identifies a surplus supply of some 20ha industrial land across Brent. The managed release of surplus industrial land accords with strategic policy, however emerging Policy DMP 33 conflicts with this overall objective to release



industrial land. The emerging policy is therefore not justified as it is inconsistent with the Council's evidence base.

Consistent with National Policy: At the heart of the Framework is the need to create Sustainable Development. Enforcing Policy DMP 33 will reduce the viability of the future development of Shurgard stores in Brent and therefore conflicts with NPPF Paragraph 21 (referred above).

The emerging policy also conflicts with Policy 20 of the Adopted Brent Core Strategy which seeks provision/ support for SME units where redevelopment proposals within Strategic Industrial Locations and Locally Significant Industrial Sites are proposed. The requirement to provide affordable workspace within all 'new major commercial development schemes' represents a disproportionate and unreasonable policy approach and should only be triggered where loss of employment floorspace is proposed at protected employment locations.

#### Council Response

This policy has been removed. It is not the Council's intention to deter economic development. The Council will seek to secure affordable workspace through the redevelopment of Local Employment Sites, where the provision of uses such as residential can help subsidise the provision of affordable workspace.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 8: Employment	Employment Uses Design and Facilities	DMP 34	N/A	CGMS Consulting on behalf of Costco
<b>Comments</b>				
<p>Costco supports the Council's recognition of the need to incorporate a range of uses within allocated employment areas in order to provide access to a wide range of facilities for visitors and staff. We consider that this approach is consistent with the objectives of the NPPF. However, we consider that this policy needs to be refined in order to provide greater clarity for developers to confirm which employment allocations are relevant for the purposes of the application of the Policy DMP34. Policy DMP34 supports "small-scale leisure, eating and retail facilities" on employment sites providing the facility is intended primarily to meet the needs of workers in the vicinity; and it does not attract significant levels of visitor traffic into the area or exacerbate existing traffic problems. We consider that the range of uses specified is too narrow and should be widened to include sui generis uses such as petrol filling stations for example. However, such employment allocations do not exist in isolation, and the neighbouring residential areas from which labour is drawn are also likely to benefit from such facilities. This synergy should not be overlooked by policy. We consider that a policy approach which seeks to protect ancillary facilities in the employment areas is unnecessary, and could potentially prevent sustainable economic development in employment areas coming forward. Furthermore, we consider that the specific reference to the visitor traffic and the exacerbating traffic problems should be removed. This policy is wording is inconsistent with the requirements of national policy which holds that "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe". Costco strongly objects to the proposed policy wording which seeks to secure planning obligations to provide child-care facilities. As with the policies commented on above, we consider that this policy could potentially prove to be a deterrent to potential investment in the Borough, and in turn to job creation and training. Furthermore, the policy fails to recognise that employers exceeding the thresholds set out in the policy frequently provide a range of benefits to staff which are in line with company specific human-resource objectives. It is not considered appropriate or desirable from a sustainable development perspective to seek to adapt company business models in the way proposed by Policy DMP34. We consider that it would only be appropriate for a developer to be required to provide contributions in this manner if the development involved the loss of a nursery or crèche, and it would therefore result in a negative impact which may need to be addressed. Developers may wish to provide a nursery on site for staff, as part of its development package however, this should not be a requirement. The collection of CIL payments will ensure that developers contribute an appropriate amount towards community infrastructure which includes child-care facilities. The proposed policy conflicts with paragraph 5.101 of the Core Strategy as amended before. Suggested amendment: For the reasons set out above, we suggest that the policy is introduced at the outset to specify to which employment allocations it applies. The facilities part of the policy should be amended as follows: "Small-scale leisure, eating, retail and sui generis uses such as petrol filling stations will be permitted on employment sites providing the facility is primarily intended to meet the needs of workers and residents in the vicinity." We consider that the final sentence of the policy should be deleted in its entirety. For the reasons set out above, we suggested that draft policy DMP33 is deleted entirely. At the very least, it is important that the words "subject to viability" remain</p>				

within the policy as drafted

#### Council Response

In the interests of taking forward clear and concise policies relevant design guidance in DMP34 will instead be incorporated into the Council's emerging New Development SPD. Policies on appropriate uses within SIL are set out in London Plan policy 2.17 and in LSIS in Core Strategy policy CP20, therefore it is not considered necessary to repeats this in policy DMP34. Policy DMP34 will not be taken forward.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 8: Employment	Employment Uses Design and Facilities	DMP 34	Brendan McRae	Macaire Enterprises
Comments		Council Response		
Comments				
The draft wording of DMP 34 states: "Proposals for employment uses, including extensions to existing buildings, must:". This wording does not allow sufficient flexibility on how employment uses may be delivered. To allow the most appropriate and site responsive approach, we consider the policy should be amended to read: "Proposals for employment uses, including extension to existing buildings, should:"				
Council Response				
In the interests of taking forward clear and concise policies relevant design guidance in DMP34 will instead be incorporated into the Council's emerging New Development SPD. Comments relating to the need for flexibility are noted and will be taken account of in producing the SPD.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 8: Employment	Employment Uses Design and Facilities	DMP 34	Neil Impiazzi	SEGRO
<b>Comments</b>				
We refer to the recent Wembley Area Action Plan proposed main modification reference PMM15, consulted on in May and June 2014. Following the Inspector's Examination Hearing Sessions in March 2014, the word "must" has been replaced with "should" in terms of green roof and green wall provision, presumably in line with the language used in adopted London Plan Policy 5.11. The draft DMP should be amended to ensure consistency across all Local Plan documents. The introduction of planning policies making green roofs and walls a design requirement can often result in unintended consequences in terms of viability and sustainability. The cost associated with the structural reinforcement that is required to support green infrastructure can be harmful to scheme viability, and thus project initiation or implementation of development. The use of roof space for green roofs also prevents the introduction of roof lights or solar photovalic panels, which can offer greater sustainability benefits in terms of renewable energy and utilising natural light. Suggested amendment: Replace the word "must" with "should" in the first instance.				
<b>Council Response</b>				
In the interests of taking forward clear and concise policies relevant design guidance in DMP34 will instead be incorporated into the Council's emerging New Development SPD. Comments relating to consistency with London Plan are noted and will be taken account of in producing the SPD.				

## Chapter 9 : Housing

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.2	Stuart Murray & Jon	Greater London Authority



			Aubrey	
<b>Comments</b>				
The London Plan sets a minimum target, not a ceiling, which should be exceeded where possible. The wording in paragraph 9.2 does not reflect this point.				
<b>Council Response</b>				
Noted the wording will be amended.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.2	N/A	Make Willesden Green
<b>Comments</b>				
All housing should be required to be marketed in the UK first. All new developments should have integrated facilities and entrances for “affordable” and other tenants – segregation should be formally barred within the Plan.				
<b>Council Response</b>				
The Council cannot control the marketing of new residential development. The London Housing SPG sets out information on design of affordable housing and entrances. This is considered appropriate and does not require a separate Brent policy.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.3	Stuart Murray & Jon Aubrey	Greater London Authority
<b>Comments</b>				
Paragraphs 9.3 addresses the Brent’s strategic housing delivery, this section would be better placed in a revision of Brent’s Core Strategy than in Development Management Policies.				
<b>Council Response</b>				
This paragraph has been rationalised as part of the wider reduction in volume of the DMP document.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Affordable Housing	DMP 36	Stuart Murray & Jon Aubrey	Greater London Authority
<b>Comments</b>				
Part (a) of policy DM 36 reiterates the affordable housing target set out in Brent’s Core Strategy Policy CP 2. This policy should be reworded to reflect that the Core Strategy has set the target and provide flexibility for it to change if a revised Core Strategy/Local Plan sets a different targeted. Thus part (a) of the policy can be rewritten as: ‘The maximum reasonable proportion of affordable housing will be required from all housing developments of sites capable of providing 10 or more units in accordance with Brent’s Core Strategy policy target that 50% of new homes should be affordable.’ The Council should ensure it has sufficient evidence to justify part (b) of this policy. The Council are proposing an affordable housing tenure split of 70% social rented or affordable rented housing and 30% intermediate housing rather than following the strategic approach to affordable housing tenure split in London Plan Policy 3.11 of 60% social and affordable rent and 40% intermediate rent or sale. The GLA would welcome further discussion with regard to part (c.) of this policy and the supporting text. Planning policy should not seek to set rents for affordable rented housing and should not refer to the Council’s tenancy strategy or any documents that would seek to set rent levels. The Tenancy Strategy has not been subject to formal consultation as a planning document and thus cannot be considered as formal planning policy.				
<b>Council Response</b>				
Agreed part (a) is to be amended to better reflect the proposed wording given by GLA Part (b) There is sufficient justification of social rent/affordable rent and				

intermediate housing split. In particular Brent median incomes are the second lowest in London according to GLA Borough profiles while the median House Price is 10th most expensive in London. This suggests that intermediate housing is a less viable option for the local population than for the wider London area. Part (c) The reference to Brent Tenancy Strategy has been removed.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Affordable Housing	DMP 36	Brendan McRae	Macaire Enterprises
<b>Comments</b>				
In regard to determining the viability of providing affordable housing as per DMP 36, the supporting text at paragraph 9.10 references the re-appraisal of viability assessments. This paragraph does not accord with national policy, where re-appraisal of viability is only appropriate on larger strategic sites where the delivery of development will be on a phased basis likely to continue for five or more years. Paragraph 9.10 should be deleted.				
<b>Council Response</b>				
Disagree. House price rises across London of 40% since the peak of 2007 indicate significant potential price inflation over short periods which distorts assumptions made on current market value within short periods, unless provision is agreed at levels which factor in growth in prices. On this basis, with the pressure for affordable housing reviews by agreement at identified timescales are considered appropriate.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Affordable Housing	DMP 36	N/A	Make Willesden Green
<b>Comments</b>				
The amount of “affordable” housing in any new development should be set at a minimum and a target level. Developers should not be granted permission to build with levels at under 20% when Brent’s target is 50%.				
<b>Council Response</b>				
The Council have a target of 50% affordable housing however in line with NPPF and London Plan requirements that sites should not be subject to a scale of obligations and policy burdens that their ability to be developed viably is threatened.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Affordable Housing	DMP 36	Sheelagh Putnam	Mapesbury Residents Association
<b>Comments</b>				
<p>Whilst there is a movement to increase the Borough’s housing stock with affordable housing, development in Mapesbury of new houses is NOT for affordable housing and such development ultimately destroys the character of one of Brent’s best preserved conservation areas. Mapesbury is a Conservation Area with active resident support on planning issues. In 2010 Mapesbury supported Brent in obtaining added conservation protection for our back gardens. Over 1000 residents supported an application to the Secretary of State to obtain added protection. It is not just the house and their gardens that are important but also the original layout of the Mapesbury Estate. Owing to the characteristic garden corridors (visible from the streets) the area had an open aspect and the "garden corridors" are particularly worthy of preservation. Consistently Brent’s Planning Department and Committee as well as the Planning Inspectorate have recognised this feature of Mapesbury. Unfortunately, having open garden sites has made Mapesbury prey to developers seeking to build on what were previously or are garden sites. We see it as crucial that Brent’s Planning Department is given greater powers to prevent such inappropriate development. Whilst there is a movement to increase the Borough’s housing stock with affordable housing, development in Mapesbury of new houses is NOT for affordable housing and such development ultimately destroys the character of one of Brent’s best preserved conservation areas.</p> <p>Whilst there is a revised design guide in the making, what is really needed is a clear and stated policy to prevent building on what are or were garden sites in this conservation area. The present policy needs more teeth, if I may put it crudely so that any applicant developer can be told from the outset that such development</p>				

is not allowed.

Please do what you can to bring this about

#### Council Response

This policy sets the Boroughs targets for affordable housing in line with NPPF and London Plan. All residential developments of 10 units or more, are expected to contribute towards affordable housing provision irrespective of where they are located. Developments within Conservation Areas or within the setting of a Conservation Area will need to comply with the relevant Design and Place-making policies. Its acceptability or otherwise will be based on its impact on the character and setting of the conservation area. Although pressure on garden space for housing will be reduced as the Mayor has revised capacity assumptions for gardens significantly downwards, a blanket approach of no garden development is not justifiable.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Affordable Housing	DMP 36	Francine Lawrence	N/A

#### Comments

The government want to see more homes built in our city. I agree with that. But they must be affordable homes for key workers and young people to keep our city alive and functioning. Developers are being given a green light to wreck communities, destroy buildings of character – that give London its attractive historic status in the world – and worst of all allowed to flout the affordable homes quota and sell to wealthy investors who often don't live in the properties but keep them as investments. Willesden Green has lost its Library. This was a DISASTER for the community. We now see the flats in the replacement development on sale in SINGAPORE. It is understood that one investor has bought the WHOLE building. And the THERE ARE NO AFFORDABLE FLATS in the final development as originally promised

#### Council Response

The DMP seeks to ensure no loss of community facilities (Willesden Green library was replaced in July 2015) and appropriate levels of affordable housing subject to viability. This is consistent with national policy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Affordable Housing	DMP 36	Matt Fielding	N/A

#### Comments

DMP 36 – introducing a minimum advertising period locally before properties are advertised elsewhere (given the issues with the Willesden Green library among others).

#### Council Response

Disagree. Such a measure would be difficult to enforce.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Affordable Housing	DMP 36	Sarah Chaudhry	Property and Projects Dept, Brent Council

#### Comments

We are seeking in regards to Council property/land that the policy takes a portfolio effect to allow for the Council to develop its assets in a way which responds to the needs of the Community, whilst also providing Value for Money. We would seek that a % requirement for affordable housing is sought across the Councils portfolio, rather than at an individual site level. For example Clement Close and Peel Road are to be used for Independent Living, which as a result will not deliver any private housing or receipt to the Council, but other sites will provide opportunities to provide a different mix of accommodation and capital receipts to the Council. We would also use the portfolio to deliver needed community/social infrastructure. In identifying the need for affordable housing we would seek that

the inclusion of community/social facilities within a development or across the Council portfolio should be taken into consideration.

#### Council Response

The NPPF and London Plan seek to create inclusive and mixed communities. Policy 3.12 of London Plan is clear that when negotiating affordable housing on residential and mixed use schemes account should be taken of circumstances of individual sites. A wider approach can be taken where the proposed development is part of a larger phased development. Adopting a portfolio approach is possible if this strategy is clearly identified at the outset with a clarity of understanding about levels of delivery on identified sites. This approach would also need to show an understanding of the extent to which this results in balanced and mixed communities, together with evidence that this might provide more affordable housing than might otherwise be the case, or if on land containing community facilities, better outcomes for the community/Brent overall.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Affordable Housing	DMP 36	Anne Clements	Quintain
<b>Comments</b>				
The Council's target for 50% affordable housing on individual developments should be evidenced through viability testing having taken account of CIL. We suggest that this is made clear under (a) recognizing that reference is made under paragraph 9.7. Please define "large or complex schemes" as mentioned in paragraph 9.8 or c confirm that residential developments comprising 10 or more units, as set out in (a). We welcome the Council's acknowledgement in paragraph 9.22 that "...it is necessary to ensure the best possible use of a potential new housing site's location and opportunities..." in order to achieve the Borough's housing target.				
<b>Council Response</b>				
The Council's 50% affordable housing target is set out in the Core Strategy and the Council is not seeking to revisit this target in the DMP. Large or complex will essentially be ones where the capacity of planning officers or other officers internal to the Council to verify the assumptions in the viability assessment is not considered to be sufficient to determine whether the Council is achieving optimal levels of affordable housing delivery. The reference in 9.22 has been removed for the sake of brevity. It however does not remove London Plan policy or Housing SPG advice which seeks to maximise housing provision on appropriate sites.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Affordable Housing	DMP 36	Dr Michael GP Maguire	
<b>Comments</b>				
Policy DMP 36 Affordable Housing should include a reference to a 'minimum site threshold size' as per Policy DPH 14. Policy DMP 36 and its supporting text should state that developers will be expected to reimburse the Council, or approved affordable housing provider, for any additional costs incurred as a result of the agreed provision of 'off site' affordable housing, or a commuted payment.				
<b>Council Response</b>				
Policy DMP15 makes reference to 10 dwellings and where in the Council's opinion a site can accommodate 10 dwellings or more (even if less are proposed) the Council will seek to obtain affordable housing. The provision of off-site contribution in lieu will be cost neutral compared to on-site provision.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.8	Dr Michael GP Maguire	
<b>Comments</b>				
Paragraph 9.8, the technical reference to 'toolkits', should be replaced with a more general reference to 'an acceptable financial appraisal, such as the GLA				

Affordable Housing Toolkit, or similar financial modelling'.				
<b>Council Response</b>				
The reference to viability assessments is now 'in a format to be agreed to be agreed with the Council'.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.9	Dr Michael GP Maguire	
<b>Comments</b>				
Paragraph 9.9, the reference to the "artificial subdivision of sites" should be incorporated as an explicit policy, as per Policy DPH 14. Paragraph 9,9, the criteria a - e should be similarly incorporated as explicit policy, as per DPH 14.				
<b>Council Response</b>				
Sub-division of sites is adequately covered in the London Plan/Housing SPG. This is not considered necessary, guidance on viability assessments is included in NPPG and the London Housing SPG.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.11	Dr Michael GP Maguire	
<b>Comments</b>				
Paragraph 9.11, should also be incorporated as explicit policy, as per Policy DPH 15.				
<b>Council Response</b>				
The requirement to provide an appropriate mix of dwelling sizes for housing developments is set out in national policy. The design and appearance of affordable housing should be of a high quality in accordance with the relevant design policies set out in the London Plan and Housing SPG				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.13	Dr Michael GP Maguire	
<b>Comments</b>				
Paragraph 9.13, a rental level of up to 80% of the local market rent is inconsistent with the Policy DMP 36 objective of emphasising the provision of social housing to meet local needs; as a rental level of this scale is effectively a form of 'Intermediate Housing' and, therefore, the rental equivalent of Shared Ownership Housing. The cost of Intermediate Housing is such that it can only realistically provide accommodation for a minority of Brent households who require affordable housing.				
<b>Council Response</b>				
It is agreed that without benefit support affordable rent is unlikely to meet the needs of the majority on priority housing need. Nevertheless, Government and Mayor funding regimes plus other housing legislation changes mean that realistically social rent dwellings will be the minority of new affordable dwellings in the future.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	DMP 37	Dr Michael GP Maguire	
<b>Comments</b>				
Policy DMP 37 should set minimum and maximum types of dwelling sizes (three and one bedroom etc) provision requirements, subject to site suitability, as per the supporting text paragraphs 9.18 & 9.21 and also per Policy DPH 9.				
<b>Council Response</b>				

This approach is considered too prescriptive. For affordable dwellings radical changes such as benefits alterations (such as the bedroom tax) can quickly make needs figures out of date. For market housing the reality is that at appeal Inspector's generally place more weight on the developer's understanding of what the market can deliver and what is viable, than the local authority. The target of CP2 of 25% family homes along with supporting evidence from the SHMA provides sufficient weight for the Council in its negotiations in meeting national and London policies for balanced housing provision that meets local needs.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Work-Live Premises	DMP 37	Anon	Anon
<b>Comments</b>				
It is time these were no longer permitted in houses where it means a loss of a residential unit. To me doctors surgeries are not compatible within in a house conversion especially when it is more than single doctor/dentist. The situation at the dentists in Park Ave, the doctors on Chichele Road or the one on Walm Lane means that ramps are required usually the whole of the front and rear gardens are converted into parking for staff parking plus `Brent them allocates further street parking for the doctors. The loss of a housing unit and the consequences is no longer appropriate There are vacant shops in both primary and secondary retail areas that should be used The old High streets usually have good public access controlled parking and usually level access too I accept that a doctor or dentist surgery is not retail but they do have a big "footfall" that is visitor numbers that would help the high street A surgery is no worse than a bank by way of retail use as both draw customers to the area. PROPOSAL: No more surgery conversions (unless strictly sole practise) in residential units				
<b>Council Response</b>				
DMP37 relates to Dwelling Size Mix the conversion of residential units into surgeries is not addressed by this policy. The acceptability of change of use of residential will be assessed taking into account potential for significant adverse harm from its activities and the need for the surgery.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Table	2	Robert Dunwell	QARA
<b>Comments</b>				
Priority Dwelling Mix – this table is nonsense as it neglects to define to what the “numerals 1,2,3 and 4 refer!				
<b>Council Response</b>				
This table has been removed. The mix will be informed by the latest SHMA that is available at the time.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Maximising Housing Supply	DMP 38	Brendan McRae	Macaire Enterprises
<b>Comments</b>				
The draft wording of DMP 38 does not go far enough to secure that new housing sites must deliver the maximum residential yield appropriate to the site. The draft further alterations to the London Plan (2014) indicate Brent's housing supply target will be increased to a minimum 15,253 dwellings between 2015 and 2025, with an annual monitoring target of 1,525. This is a 43% increase above the 2011 minimum target of 10,650. It is imperative that Brent policy is unambiguous in its support for meeting these targets. To ensure the residential yield of sites is maximised, we consider the policy should be amended to read: New housing development must be designed to realise its full potential residential capacity by making the very best use of its general locational and particular site opportunities.				
<b>Council Response</b>				
This issue has been removed from Policy in the DMP as it is considered it is sufficiently covered in the London Plan policies and Housing SPG.				



Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Maximising Housing Supply	DMP 38	Robert Dunwell	QARA
<b>Comments</b>				
b – delete the words “and would result in the loss of no more than one unit”. Reason: does LBB require family accommodation or not? The phrase “Having your cake and eating it springs to mind”!				
<b>Council Response</b>				
London Plan policy 3.14 does not permit a net loss of housing units.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.24	Robert Dunwell	QARA
<b>Comments</b>				
similar deletion as per para. 7.2 above.				
<b>Council Response</b>				
London Plan policy 3.14 does not permit a net loss of housing units				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.26	Blair Thorpe	N/A
<b>Comments</b>				
In conversions no matter what size the building first was the number of flats can cause problems in that the original building was not designed for such intensive use thus communal hallways are too narrow front gardens not big enough for bikes bins and cars without too much comprise. I feel there should be something about the facilities and access This is why in the past larger blocks of flats were purpose built so that such things can be accommodated I feel at least the minimum area should be bigger and communal areas must be adequate PROPOSAL" increase size to 160sq meters and relate total number of flats to size of hallways bulk storage capacity bin and bin stores without compromising on the soft landscaping (50%) Your policies don't mention the need for storage of bulky items wardrobes are enough there needs to be a area/cupboard for large items Communal purpose built flats in old days always had a storage lockers included				
<b>Council Response</b>				
The figure of 130sqm is an increase in the 110sqm required in the UDP 2004. This figure was selected as the minimum required to meet current London Plan minimum floor areas (consistent with national described standards) while also providing an acceptable quality of housing including a family unit. In addition to this standard 4.1.2 states that dwelling plans should demonstrate that dwellings will accommodate the furniture access and activity space requirements relating to the declared level of occupancy. All new developments within Brent have to comply				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.38	Robert Dunwell	QARA
<b>Comments</b>				
see earlier comments regarding the necessity of SPD17 before continuing with this DDMP.				
<b>Council Response</b>				
Noted please see earlier response				



Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Conversions	DMP 39	Robert Dunwell	QARA
<b>Comments</b>				
a – Delete the 130sqm stipulation (No rational given for this change!), revert to previous 110sqm but keep the inclusion of 3 bedroom unit.				
<b>Council Response</b>				
The use of the original size minus extensions is not considered appropriate as applications have to relate to what is there currently. The criterion is used as it essentially reflects a size that can incorporate a 1 and 3 bed property when taking account of London Plan standards.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Conversions	DMP 39	Dr Michael GP Maguire	
<b>Comments</b>				
Policy DMP 39, the word '(unextended)' should be added to criterion a), to elaborate the "original floor area" requirement.				
<b>Council Response</b>				
The use of the original size minus extensions is not considered appropriate as applications have to relate to what is there currently. The criterion is used as it essentially reflects a size that can incorporate a 1 and 3 bed property when taking account of London Plan standards.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Housing Standards and Quality	DMP 40	Brendan McRae	Macaire Enterprises
<b>Comments</b>				
The draft wording of DMP 40 indicates residential schemes should provide external private amenity space of 20sqm per flat and 50sqm for family housing. The level of external amenity space appropriate to a development should be determined on a site by site basis. This helps ensure the supply of housing is not unnecessarily constrained by the need to deliver amenity spaces in accordance with a standard rather than demonstrated need. Sites for new housing, particularly in urban areas where higher densities are both sought and are achievable, are essential to meeting Brent's housing targets. These sites should be allowed the maximum flexibility to deliver development. We consider the reference to amenity space targets should be deleted, or at least revised to achieve compliance with the London Plan Housing SPG (2012) that seeks 5sqm of space per 1-2 person dwellings, and an extra 1sqm for each additional occupant.				
<b>Council Response</b>				
Appropriately sized gardens as set out in DMP40 are based on the NPPF requirement for comprehensive policies that set out the quality of development that will be expected. However it is recognised that not all developments will be able to meet this target. Paragraph 10.41 provides an approach towards amenity space which allows for flexibility.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Housing Standards and Quality	DMP 40	Anne Clements	Quintain
<b>Comments</b>				
The Council's requirement for amenity space normally comprising "20sqm per a apartment and 50sqm for family housing including ground floor flats" should be clarified so that along side private balconies and terraces appropriate account can be taken of shared play space and communal gardens for residents provided in many flatted developments.				
<b>Council Response</b>				
The policy explanation makes reference to these other forms of communal provision being appropriate in meeting the standard.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.43	Robert Dunwell	QARA
<b>Comments</b>				
Last sentence – insert “the council will normally resist - - -” (individual circumstances may give rise to this being allowed.				
<b>Council Response</b>				
The use of normally is not favoured in policy by Inspectors. The policy is clear, material considerations will indicate if circumstances provide for exceptions to be made.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.41	Robert Dunwell	QARA
<b>Comments</b>				
see earlier comments regarding the necessity of SPD17 before continuing with this DDMP.				
<b>Council Response</b>				
Noted please see earlier response				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.45	Blair Thorpe	N/A
<b>Comments</b>				
In conversions the dividing up of rear gardens into little squares is not appropriate it means that non are big enough to accommodate trees etc as it leads to too much shading If rear gardens are directly accessible to each flat then the majority of rear garden should be communal PROPOSAL: restrict the dividing up of rear gardens to a min size or ban unless flat has direct access				
<b>Council Response</b>				
Gardens will generally be associated with the ground floor flat as this will be the family unit. Where gardens are shared it will be necessary to some screening and planting to ensure the privacy of the residents of the ground floor flat.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Hostels and HMOs	DMP 41	Dr Michael GP Maguire	
<b>Comments</b>				
Policy DMP 41, and its supporting text, should specify that these types of accommodation, with their shared facilities, are 'non-self contained accommodation'. The section of Policy DMP 41, referring to the "loss of non self contained accommodation" should be a separate specific policy.				
<b>Council Response</b>				
The policies in this section have been rationalised for the sake of brevity.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Paragraph	9.74	Dr Michael GP Maguire	
<b>Comments</b>				
Paragraph 9.74 states "Brent has 30 pitches, this is a larger provision than most London Boroughs and meets a reasonable amount of demand for sites". Where is the empirical evidence to substantiate this assertion ?. If Brent has made a larger proportional provision, it is because Brent has more Travellers than many				

other boroughs. I particularly note in this context, that there is no reference to any specific Gypsy and Traveller accommodation studies in the Evidence Base cited at the end of this Housing Chapter. Nor any recent empirical information in the accompanying Sustainability Appraisal (see my comments on this specific Consolation). This factual omission, and the corresponding lack of specific policy, is not because of a lack of empirical information showing the need for further Traveller pitches in Brent, as this requirement was clearly demonstrated in a detailed research study commissioned by the GLA several years ago (2009-2010). A follow up study by Brent Planning and Housing officers identified the requirement for at least one new Travellers Site. However, this GLA study was not incorporated in the London Plan because of the resolute refusal of a number of boroughs to accept their proportional additional pitch allocations. Similar opposition by some Brent councillors and senior officers prevented further additional site identification progress. Even though this Brent research project had shown that the Lynton Close Travellers Site was located in an environmentally unsuitable area, being subject to pollutants from adjacent industrial and waste storage activities. And that it provided insufficient accommodation to meet identified Travellers needs. Given that Travellers (Irish and Scottish) and Gypsies (Roma and Sinti) are legally defined as ethnic minorities, on account of their historic discrimination and poor socio-economic status, the Plan's failure to recognise the need to make further specialised accommodation provision, expressed in a dedicated policy, could represent indirect decimation; contrary to both British and European human rights and anti-discrimination legislation. It is inappropriate to argue that this draft Plan should not provide a specific development management policy in respect of such a specialised accommodation sector because there is a relevant Core Strategy policy. Particularly, as a number of other development management housing policies could be deleted on the basis of this argument.

#### Council Response

The Plan addresses development management policies and is not an allocations plan. Since the adoption of the Core Strategy the NPPF along with a simultaneous publication of guidance on gypsies and travellers has given updated advice on this issue. Realistically a West London approach to understanding needs and planning for its provision needs to be in place to address identified needs and policy move forward from that. Until then the Core Strategy policy provides a sufficient policy basis along with NPPF and associated guidance on which to base any decision for any application received.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Other		Dr Michael GP Maguire	

#### Comments

Residential Standards The reference to 'studio' requirements, should be expanded to emphasise that these provide 'single habitable room accommodation, with separate kitchen and bathroom areas'. The "GIA" reference in the Residential Standards table should be elaborated as 'Gross Internal Area' and specifically delineated as being 'sq,metres'. Child Yield Modelling The 'Wandsworth Model', for calculating the likely number of children that will be housed in different dwelling size and tenure type accommodations, is an inappropriate methodology for Brent, which has a very different demographic composition than Wandsworth. The unsuitability of applying the Wandsworth Model to Brent was demonstrated during the Council's negotiations on the Quintain /Wembley development.

#### Council Response

Noted

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Other Conversions	N/A	Blair Thorpe	N/A

#### Comments

It is time these were no longer permitted in houses where it means a loss of a residential unit. To me doctors surgeries are not compatible within in a house conversion especially when it is more than single doctor/dentist. The situation at the dentists in Park Ave, the doctors on Chichele Road or the one on Walm Lane means that ramps are required usually the whole of the front and rear gardens are converted into parking for staff parking plus `Brent them allocates further street parking for the doctors. The loss of a housing unit and the consequences is no longer appropriate There are vacant shops in both primary and

secondary retail areas that should be used The old High streets usually have good public access controlled parking and usually level access too I accept that a doctor or dentist surgery is not retail but they do have a big "footfall" that is visitor numbers that would help the high street A surgery is no worse than a bank by way of retail use as both draw customers to the area.

PROPOSAL: No more surgery conversions (unless strictly sole practise) in residential units

#### Council Response

Noted. It is considered that this is unrealistic as these uses are not identified as a main town centre use for sequential purposes. Policy DMP 16 now makes reference to not allowing loss of housing unless c) providing social or physical infrastructure to meet an identified local need.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Student Housing	DMP 42	John Smith	CgMS on behave of Unite Housing
<b>Comments</b>				
<p>The strategic development plan requirement to ensure the needs of all sectors of housing requirement should be taken into account and that this must be reflected in an up-to-date development plan. The London Plan states that Boroughs need to ensure that strategic and local need for student housing is met without compromising capacity for conventional homes and this accommodation type, whilst forming part of overall housing delivery. In our client's opinion the emerging Local Plan fails to reflect the needs of the student accommodation across London and particularly in Brent.</p> <p>As currently drafted Policy DMP 42(a) essentially introduces a punitive restriction prohibiting student accommodation on sites that are suitable for self-contained housing.</p> <p>This will restrict delivery / supply of student accommodation and will therefore prejudice the Council's ability to meet this need. In doing so, the emerging Local Plan Policy is not justified and fails to comply with government guidance and the strategic development plan, as required by paragraph 182 of the NPPF.</p> <p>The London Plan highlights the strategic requirement to ensure student accommodation demand across London is met (Policy 3.8). Research published by Deloitte Real Estate in 2013 reports:</p> <ul style="list-style-type: none"> <li>? that the number of students in London rose to 294,555 in 2013/14</li> <li>? and the number of purpose-built student bed spaces rose to 66,787.</li> </ul> <p>This represents just 22% of total provision within purpose built student accommodation.</p> <p>Mindful of the London Plan policy requirement to ensure student accommodation strategic need is met, it is clear the restrictive approach amplified within the emerging Development Management Policy cannot be supported. As drafted, the policy effectively reserves every potential development site for conventional housing as an initial priority. Bearing in mind the vast majority of sites suitable for student housing would also be suitable for student housing, the potential for any site to accommodate student housing is quashed.</p> <p>Given the identified existing and ongoing need for additional purpose-built student accommodation (referred above at a strategic and local levels), the proposed requirement, over and above the requirement to ensure student accommodation does not compromise capacity to deliver conventional dwellings, is unduly restrictive. Further, this approach conflicts with Policy 21 of the NPPF which requires LPAs to draw up Local Plans which positively and proactively encourage sustainable economic growth. The London Plan Paragraph 3.52 recognises that London's universities make a significant contribution to its economy and labour market and it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation.</p> <p>The restrictive policy for provision of student accommodation as detailed in the emerging Local Plan is therefore unnecessary and will potentially prejudice the Council's ability to meet student accommodation need. This in turn conflicts with London Plan aspiration to ensure the attractiveness of London's universities is maintained (Paragraph 3.52).</p> <p>The Draft Plan is therefore contrary to the adopted London Plan, Policy 3.8(B)(h) which requires specific types of housing need to be addressed in development plan documents. The Council's objective to protect conventional housing supply can be met through the established London Plan test (Policy 3.8B(h)).</p> <p>The London Plan seeks to ensure that student accommodation need should be accounted for whilst not prejudicing supply of conventional housing (Policy 3.8).</p>				

The restrictive nature of the draft policy is considered unnecessary as the Council's plan monitoring confirms that both the 5-year and 10-year housing land supply target (including an additional 5% buffer) is forecast to be met. The proposed requirement to ensure student accommodation forms part of a mixed use development is therefore unnecessary. Two key factors are relevant: (a) Brent demonstrate conventional housing land supply is met and (b) purpose built student accommodation has a positive impact upon conventional supply.

Brent have demonstrated a deliverable 5-year conventional housing land supply, meaning the provision of student accommodation will not compromise the borough's capacity to meet this need. Analysis of housing monitoring data confirms a 5 and 10 year supply of deliverable housing will be achieved and it is therefore demonstrated that Brent can comfortably achieve a short and medium term conventional housing supply. Consequently, there is no strategic policy basis to restrict student housing supply over and above the policy test within the London Plan. Conversely we believe purpose built student accommodation will free up demand for conventional housing and therefore increase supply overall.

This is supported by the sub-text to the draft Policy the Appeal Inspector within decision reference A/12/2173692 (Pooley Street, LBTH), stating: -

"the development will increase the supply of student accommodation and will do so without, in my view, materially compromising the delivery of conventional housing. In fact, it is likely to lead to an increase in the supply of housing available to the conventional market."

The requirement for some flexibility in this regard is emphasised by the South West London Strategic Housing Market Assessment (SHMA) 2011 which confirms:-

"The impact that student lets can have on a local housing market is to distort the availability of certain sizes of property which may, otherwise, be available for families in need."

No planning policy basis exists to pursue student accommodation as part of a mixed use development, particularly as an adequate housing land supply exists. The impact of student housing upon conventional supply is further referred to by appeal inspector in his decision (Blackburn Road, ref A/10/2127151) where the London Borough of Camden sought to argue development of purpose built student accommodation represented a 'lost' opportunity to provide conventional dwellings. This was despite evidence to demonstrate the Borough could demonstrate a 5-year land supply of housing and notwithstanding the Mayoral objective that housing targets do not represent maxima. The inspector stated: -

"While these targets are not ceilings, and the Council has an expectation that the targets will be exceeded, I am not convinced that the proposed scheme would undermine the Council's housing objectives."

Mindful of housing supply analysis, it is therefore demonstrated that the requirement that sites where self-contained housing could be reasonably be expected is onerous, conflicts with the strategic development plan and cannot be supported.

### Council Response

It is recognised that students form a significant proportion of the population and provision of accommodation for them is needed as part of a balanced and mixed communities. The large-scale provision by specialist providers in the Borough, particularly in Wembley has been positive, which has been included in a revised policy explanation for the Accommodation with shared facilities/additional support policy. Wembley Area Action Plan has a 20% limit on student proportion of the population. The policy explanation also deals with potential adverse impacts of an over-concentration of uses which can be dealt with through the General Development Management Policy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Student Housing	DMP 42	John Smith	CgMS on behalf of Unite Housing
<b>Comments</b>				
<p>The proportion of wheelchair accessible rooms</p> <p>Draft Policy DMP42(b) requires 10% of all bed-spaces to be wheelchair accessible. The policy as drafted is not supported as it fails to reflect the strategic development plan and supporting Mayoral Guidance. Student accommodation possesses different requirements in this regard to conventional housing and therefore proposals for this specialist accommodation need should be determined on a case by case basis. This is reflected in the adopted London Housing SPG</p>				

produced by the GLA (November 2012) which notes: -Mayor Housing SPG paragraph 3.1.24 (Identifying Housing Need): “Guidance on implementing Policy 3.8B(d) (wheelchair accessible housing) is given in paragraph 2.1.18 of this SPG, in the housing design standards of Part 2 and in Annex 2...”

? Paragraph 2.1.18 forms part of the Introduction of the detailed housing design requirements set out in Section 2 of the SPG “Quality”. This paragraph is ambiguous/silent regarding student accommodation and the 10% requirement.

? The housing design standards of Part 2 confirm simply 10% of new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users (Baseline Standard 4.9.1).

? Paragraph 2.1.14 (within the Introduction to housing design standards of Part 2) refers to the “Baseline” and “Good Practice” standards and states “The standards do not apply to specialist forms of housing including student housing...”

It is therefore considered that Policy H7 is amended and paragraph 5.47 in particular is deleted in order to reflect the latest definition within the GLA Housing SPG. This approach is supported by a robust evidence base regarding demand for wheelchair accessible student accommodation. This is highlighted immediately below.

Unite currently have only one wheelchair using student in their entire London portfolio of 7926 beds. In 08/09 one accessible room was rented to a wheelchair user and another was rented to an able-bodied user. 87 units went unrented that year. Similarly in 09/10 one was rented to a wheelchair user, one to an otherwise disabled user, 27 to able-bodied users and 67 went unrented. In terms of the nationwide picture, according to the latest HESA data there were circa 900,000 fulltime students in 2007/08 throughout the UK. Of these only 2,500 were wheelchair students equating to less than 0.1% of the total. The enclosed accessibility evidence provides further information of the level of provision against current need.

Allowing wheelchair requirements within student accommodation schemes to be determined individually ensures that appropriate provision can be made to meet identified demand. It is clear that the emerging Local Plan cannot be considered sound in this regard as it does not reflect the Mayor Housing SPG.

The baseline policy position at a strategic level is provided at Policy 3.8Bd which requires that ten per cent of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchairs users. The consequence of this policy has been that boroughs, both in preparing their LDF documents and in planning decisions, have taken this literally and sought 10% minimum wheelchair provision for all forms of housing including student housing.

This is despite the GLA Housing SPG explicitly excluding student housing from the London Plan housing standards. Thus at a strategic level there is consequently no policy requirement to meet 10%. The reality is that typical demand from students per annum falls well below the 10% mark. This is evidenced by UNITE’s experience in relation to this provision which highlights that only one wheelchair unit has been required this year. Over the last two years UNITE have had no wheelchair users in their London estate, which currently has 430 wheelchair units available. Further, Building Regulations require that 5% of units are wheelchair accessible. This ensures that, whether there is a planning policy position on wheelchair housing or otherwise, an element of wheelchair accessible units is provided which is more in line with typical demand for such units.

One of the consequences is that in order to meet the requisite design standards which are larger than general units fewer standard units per proposal can be provided. This has the knock on effect of reducing the number of units to achieve the London Plan standards whilst also reducing the potential supply and thus potentially impacting on the supply of conventional homes.

We would stress that UNITE are committed to providing wheelchair accessible units and ensuring their student accommodation schemes are inclusive to all. UNITE operate a policy of meeting the needs of an individual user and not applying a one size fits all policy. Indeed, should individual bedrooms need to be adapted, this can be done quickly and relatively easily to meet requirements particularly given the nature of student accommodation where ‘sign up’ is carried out in advance of the term starting. It is therefore not considered necessary to overprovide on disabled facilities which will not be used. UNITE have also worked in close liaison with the GLA Access Officer in outlining accessibility management plans to ensure that the management of those with accessibility issues are correctly addressed. Further, the 10% requirement was introduced in order to help meet a shortfall in the demand for wheelchair accessible housing within conventional housing. This is based on a demographic application to general housing and the population as a whole. The student demographic is generally between 18-25 years of age and there is consequently a much lower need for wheelchair users. As evidenced by UNITE’s own experience such demand does not exist for student accommodation.



**Council Response**

The policy has been amended, the amount of mobility housing will be related to evidence provided to justify any alternative proposed to London Plan standard approach for self contained properties.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Student Housing	DMP 42	John Smith	CgMS on behalf of Unite Housing

**Comments**

Student housing schemes have a positive impact on local areas. Research and recent appeal decisions confirm that students support local services, shops and facilities by increasing demand and thus contributing to the local economy. It has been found that these services often improve benefitting those living in the area. The National Union of Students (NUS) estimates that 42% of students work part time which will benefit the local community.

Students also support local services, shops and facilities by increasing demand and thus contributing to the local economy. Moreover, according to Universities UK 'Universities: engaging with local communities' document (2010) the average spend by full time English students on living costs is £6,496. This equates to a £107million injection to London's economy, supporting £80billion of UK economic output and 83,000 jobs. These are enormous contributions to the local economy, recognised at Paragraph 3.52 of the adopted London Plan.

Further, there could be longer term impacts as students often seek other accommodation in the same area after leaving dedicated accommodation. This contributes to creating a stable community by encouraging people to stay and bring up their families in the Borough. UNITE's experience is that there are also limited objections to their proposals from neighbouring occupiers including residents. Student housing schemes also maintain the existing character of the areas in which they are located.

UNITE are also a well established student accommodation provider, experienced in managing student accommodation in London and across the country. All their properties are operated in accordance with the Company's 'Student Management Plan' which ensures they are occupied in a manner that protects the amenity of local residents. All students are required to enter into a lease agreement to ensure that the Management Plan is adhered to. This helps safeguard the amenities of the locality.

It is therefore considered that there is adequate policy protection at strategic level to ensure mixed and balanced communities which is not required to be repeated at local level. In any case student housing schemes contribute to mixed and balanced communities which are suitably managed.

**Council Response**

It is recognised that students form a significant proportion of the population and provision of accommodation for them is needed as part of a balanced and mixed communities. The large-scale provision by specialist providers in the Borough, particularly in Wembley has been positive, which has been included in a revised policy explanation for the Accommodation with shared facilities/additional support policy. Wembley Area Action Plan has a 20% limit on student proportion of the population. The policy explanation also deals with potential adverse impacts of an over-concentration of uses which can be dealt with through the General Development Management Policy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Student Housing	DMP 42	John Smith	CgMS on behalf of Unite Housing

**Comments**

The Draft Policy and supporting text at paragraph 9.64 in this regard will constrain the supply of purpose built student accommodation as it restricts the ability to meet identified demand at local and regional level. This element of the draft Local Plan directly contradicts with London Plan Policy 3.8B(h) and also with the Adopted Housing Supplementary Planning Guidance (SPG) published by the GLA in November 2011.

Policy 3.8B(h) requires boroughs to account for strategic need. This need is referred to above, at London-wide and sub-regional levels. Further, paragraph 3.1.59 of the Housing SPG states: -



“In considering LDF policy approaches to, and proposals for new student accommodation, boroughs should not constrain provision which meets strategic as well as local needs.”

The Policy conflicts with paragraph 3.53B which states student accommodation will be secured by planning agreement or (my emphasis) condition relating to the use of the land or occupation by members of a specific educational institution. In order that the proposed Policy is sound it should be widened to reflect the London Plan.

In addition we would add that the commercial reality is that HEI's do not generally want to get drawn into long term nomination agreements for a variety of reasons including for example the use of limited available financial capital towards this versus improving teaching facilities.

#### Council Response

FALP 2014 para 3.53b states that Student accommodation should be secured as such by planning agreement or condition relating to the use of the land or to its occupation by members of specified education institutions. Where there is not an undertaking the providers should deliver an element of affordable housing. This is reflected in the proposed re-wording of the policy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Student Housing	DMP 42	John Smith	CgMS on behalf of Unite Housing

#### Comments

The draft policy seeks that student housing schemes do not consist predominantly of self-contained studio type accommodation. Whilst Policy 3.8 of the London Plan seeks that there is a choice of homes to cater for different sizes and types of dwellings, there is no strategic policy requirement relating to student housing. Nevertheless the type of schemes brought forward by UNITE and other student housing providers generally comprise a mix of unit types with the majority comprising cluster units. Indeed the provision is also based on market demand. With a focus on affordability there has been a recent trend on not only the delivery of more cluster units, but larger cluster units. This therefore not only satisfies the requirement to provide a mix of units, but are not predominantly self-contained accommodation whilst also being more affordable.

#### Council Response

The concern about the provision of studio units was predominantly related to the experience the Council has associated with conversion of existing dwellings by small scale operators, rather than the large scale purpose built providers. On balance it is considered that this issue is best addressed through DMP1 related to a judgement on the quality of the accommodation proposed.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Student Housing	DMP 42	Stuart Murray & Jon Aubrey	Greater London Authority

#### Comments

The policy should also require that student accommodation should be secured by planning agreement or condition relating to the use of the land or to its occupation by members of specified educational institutions. Where such an agreement is not in place an element of affordable student accommodation should be provided as per paragraph 3.538 in the Further Alterations to the London Plan (FALP). The Mayor's Academic Forum will provide information for the delivery of affordable student accommodation, which could be incorporated into a future draft of this DPD.

#### Council Response

Added to the policy, plus further reference to Policy 3.8 and the Housing SPG re: affordable student units.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Specialist or Supported	DMP 43	Stuart Murray and	Greater London Authority

	Accommodation Providing Care		Jonathan Aubrey	
<b>Comments</b>				
The FALP has introduced new benchmarks in Annex 5 for specialist housing for older people that Council should consider referring to in their policy.				
<b>Council Response</b>				
Noted.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Specialist or Supported Accommodation Providing Care	DMP 43	Stuart Murray and Jonathan Aubrey	Greater London Authority
<b>Comments</b>				
The FALP has introduced new benchmarks in Annex 5 for specialist housing for older people that Council should consider referring to in their policy.				
<b>Council Response</b>				
Noted.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Specialist or Supported Accommodation Providing Care	DMP 43	Sarah Chaudhry	Property and Projects Department, Brent Council
<b>Comments</b>				
Specialist or support accommodation providing care –Where this is Independent Living accommodation, we would seek that this would contribute to affordable housing targets				
<b>Council Response</b>				
Where this is self-contained and falls within the definition of affordable housing, this will be the case.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Overall Chapter		Matt Fielding	N/A
<b>Comments</b>				
DMP 36 /37 40 – the removal of ‘target’ and inclusion of ‘minimum’. Too often have councils been bullied by housing developers, who have often bought the land in full knowledge that the council will never get the targets it wishes. Land is one of the council’s major assets, and it has to be used wisely. Brent is in a strong position here and should be more assertive. All of section 9 – making an explicit note in all DMP sections here that the goal of getting more housing is long term in nature, and must take into account other sections of the DMP (particularly section 2 and section 10 for social infrastructure, particularly protecting assets that offer some form of community benefit). I see you do this in DMP 44, so should also consider the other way otherwise it appears more housing is the primary goal above all else.				
<b>Council Response</b>				
Consistent with London Plan policy the Council will seek to maximise the amount of affordable housing delivered on housing sites.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 9 : Housing	Overall Chapter		Dr Michael GP Maguire	
<b>Comments</b>				
3. Housing, Chapter 9				

3.1 Reference is made for comparative purposes to specific policies in the Preferred Options Draft Plan (2007, see above), which are denoted as 'DPH 14' etc.

Structure of Housing Chapter

3.2 Policy DMP 38 Maximising Housing Supply should be the 'opening' policy in this chapter, so as to set its overall contextual objectives.

3.3 Similarly, Policy DMP 40 Housing Standards and Quality, should be the 'second' policy in this chapter, so as to emphasise its key overarching importance.

Introduction

3.4 Paragraph 9.3 states that Brent's annual housing target will rise, as proposed in the emerging Further Alterations to the London Plan, from 1.065 homes to 1.525. This target has been included as a Delivery and Monitoring indicator (Table 9, page 93). But no information is provided as to how this 43% increase can be sustainably achieved.

3.5 Paragraph 9.4 states "This chapter sets out how planning decisions will be made in support of Core Strategy policies CP2 and CP21 in particular". Specific reference should also be made to Core Strategy Policy CP6 Design and Density in Place Shaping, given its crucial significance for sustainable housing development.

#### Council Response

The section has been amended so that it does not repeat London Plan policy which is part of the development plan but makes appropriate reference to it. All relevant policies within the development plan are material in the determination of planning applications, the order in which they appear in the documents is not relevant, unless specific reference is made to their prioritisation being related to the order in which they are in.

The target for Brent within the London Plan has been approved through the Examination process and has been adopted. It is a target that Brent will be expected to show it can achieve when it brings forward its next Borough wide Local Plan or Site Allocations Policies.

Suitable reference is made to the need for design quality within the document.

## Chapter 10: Social Infrastructure

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Overall Chapter		Matt Fielding	
<b>Comments</b>				
I would strongly urge the council to have a specific pub protection policy, given the issues it has had over the years. See comments above that are relevant (but not exclusively so). A full pub protection policy would ensure proper scrutiny of planning applications in an area where the council is fully aware there are issues. It is not sufficient for this to be dumped in 'social infrastructure', which can be easily side-stepped by a canny developer with far more resources than the council at its disposal. Having a robust policy in this area would seek to safeguard the council from being caught blindsided by a canny developer, from having to spend a great deal of time and money on the 'right decision' where council policy is vague, and would ensure it is proactive about the issues I, and many other residents have sought the council to tackle on our behalf. Many other councils have specific policies to protect their pubs, and Brent should be no different. We have been promised a proper policy for well over a year now, and the council have been offered support in generating one. Everyone has priorities, but this is one chance every few years that the council has to put things right in a policy, so as to prevent future issues down the line. It would be a short term piece of work for hopefully a long term benefit. Unfortunately, this is the one section where I still do not think you are doing enough. As a resident I would like you to put this right. The last time I tried to write to my councillors I got a fairly lacklustre response (in one case I had to repeatedly chase), but I am doing so again just in case they have had a change of heart and so they are aware their residents have views which they would like them to put forward on their behalf. Councillors, if you would like any further detail in making representations on my behalf and of your residents I'm happy to elaborate on any points further. I trust you are also responding to the consultation.				
<b>Council Response</b>				

A specific pub protection policy has been added to the DMP in response to comments.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Overall Chapter		Paul Edgeworth	N/A
<b>Comments</b>				
<p>As a Brent resident I am responding to the Council's Development Management Policies consultation.</p> <p>With regard to Section 10 of the consultation, given the amount of pubs in the borough that have been lost of the past few years, and the threats to other pubs from developers, I think it is imperative that the Council also implements a policy specifically for pubs.</p> <p>Pubs are unique as community hubs and focal points of an area, and should have special protections and considerations in the planning process when they are under threat from demolition or change of use.</p> <p>A proper pub protection policy would make sure that proper scrutiny and consideration is given to applications to demolish or change the use of local pubs. Many other London boroughs have such pub protection policies in place, and I know that the Campaign for Real Ale can provide advice and a template/suggested policy if that would be helpful.</p> <p>Considering pubs in a catch-all 'social infrastructure' category/policy is not sufficient to protect community pubs from aggressive and often unwanted development, where developers can undermine pubs by claiming that they are not viable.</p> <p>I would also like the Council to consider Asset of Community Value status as a material planning consideration. (Section 10.7)</p>				
<b>Council Response</b>				
A specific pub protection policy has been added to the DMP in response to comments. Supporting text clarifies significant weight will be given to the protection of Assets of Community Value. This will be a material consideration.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Paragraph	10.1	Cathleen Munonyedi	N/A
<b>Comments</b>				
I would advocate the inclusion of policies relating to the provision of facilities relating to the arts and cultural including theatres, art galleries within the social infrastructure section, cross-referencing the Open Space policies and pre-ambles with the Brent's Cultural Strategy.				
<b>Council Response</b>				
DMP44 applies to social infrastructure, which includes community and cultural facilities. For clarification reference has been added to Brent's Cultural Strategy, and theatres and galleries have been included as an example of social infrastructure.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Paragraph	10.3	Francine Lawrence	N/A
<b>Comments</b>				
Willesden Green has lost its Library. This was a DISASTER for the community. We now see the flats in the replacement development on sale in SINGAPORE. It				

is understood that one investor has bought the WHOLE building. And the THERE ARE NO AFFORDABLE FLATS in the final development as originally promised.

#### Council Response

A new cultural centre including a library will be provided as part of the redevelopment. In the interim temporary libraries are located at the Lewison Centre and George Furness House. The Council cannot use planning powers to prevent developers advertising properties for sale outside of the UK, however, the Mayor has a voluntary code, which all developers are encouraged to sign, committing to market homes to Londoners before, or at the same time as buyers from other countries. The Council's Core Strategy sets a target for schemes of 10 or more homes to provide 50% affordable housing. To be consistent with the National Planning Policy Framework (NPPF) this is subject to viability, and all schemes of this scale are accompanied by a viability assessment to provide evidence of the level of affordable housing which can be achieved. This assessment is scrutinised by the Council.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Loss of Social Infrastructure	DMP 44	Jennifer Cameron	N/A

#### Comments

My comment here is in the form of a Question. If DMP 44 had been in force at the time, would Officers still have recommended demolition of the Queensbury? If, as I suspect, the answer is no, something in the Plan has to be changed. Please re-read the comments of objectors and note the numbers of signatures on petitions. It is absolutely clear that the community believe the Queensbury to be a vital piece of social infrastructure with the most heartfelt complaints being the loss of somewhere 'decent' to meet and talk. The Plan should have provisions that will ensure it cannot be demolished. Perhaps there should be a separate Pub Protection Policy along the lines of the CAMRA Model as I'm told has been adopted by a number of other Local Authorities but I think there is also a wider point. The assumption in DMP 44 and 10.6 is that pieces of social infrastructure are interchangeable and alternative provision elsewhere is a solution. It isn't in a case like the Queensbury where the building and its location and function are all interlinked. We don't value a Pub. We value that Pub in that Building at that Location and its integration into the street scene in that place. It's not what's at the new location that matters but that the fact that the old location and that opportunity for social intercourse in that place is lost for ever. A dead spot is created where a vibrant interactions took place. This happened when we lost the open space outside Willesden Green Library and the demolition of the Queensbury as recommended by Officers would have finished the job of destroying the Willesden Green community. Somewhere in the DMP there should be recognition that Planning is about communities not just the building blocks. The impact of successive planning Applications is cumulative and must be seen to be so. Seven huge blocks of new flats where there were none before and each application being looked at in isolation. This can't be allowed to continue and the Plan should do more than provide sound bites for quoting in reports.

#### Council Response

A specific pub protection policy has been added to the DMP in response to comments.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Loss of Social Infrastructure	DMP 44	Ian Elliott	Save the Queensbury

#### Comments

Brent acknowledges the need to guard against the unnecessary loss of valued facilities and services but is not taking the appropriate steps to do so. DMP 44 states that loss of social infrastructure, including redundant premises and land, will only be acceptable in exceptional circumstances where: a. a replacement facility of at least equivalent quality and quantity is provided on the site or at a suitable alternative location; or b. it can be demonstrated there is no longer a need for the social infrastructure facility. Taking The Queensbury as an example, it is highly likely that officers would have reached the same conclusion within the policy above as they did in March 2014, recommending its demolition.

Council Response				
A specific pub protection policy has been added to the DMP in response to comments.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Loss of Social Infrastructure	DMP 44	Sarah Chaudhry	Property and Projects Department, Brent Council

Comments				
<p>Would seek that this also took into account the financial viability of social infrastructure to consider whether it can be lost, and also Council priorities in regards to Social Infrastructure. Would seek that the policy recognised the balance between the loss of one type of social infrastructure to allow for the increase of another type of social infrastructure. Would seek that the policy was not focused on a need for a replacement in terms of quantity, but considered if a replacement facility would provide an improved social infrastructure space which was more accessible and better met the needs of the community. This could allow for underused social infrastructure to be rationalised to create spaces which meet the needs of the Community better and provide for the opportunity for the co-location of facilities.</p>				

Council Response				
<p>Social infrastructure, due to its nature, is generally not for profit and in many cases supported by public subsidy, meaning the inclusion of viability would not be relevant. However, it is acknowledged providers are facing financial constraints and having to explore other mechanisms to deliver social infrastructure, which may include consolidation. Therefore to be consistent with amendments set out in the FALP supporting text has been added clarifying that loss may be acceptable where there is an agreed programme of social infrastructure re-provision, as evidenced by a service delivery strategy. The proposed policy allows for the replacement of one type of social infrastructure with another , subject to it not resulting in a shortfall in provision, as is consistent with London Plan policy 3.16. Quantity?</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Loss of Social Infrastructure	DMP 44	N/A	MOPAC

Comments				
<p>This representation relates to draft policy DMP44: Loss of Social Infrastructure. Paragraph 10.1 indicates that the Council includes ‘policing and other criminal justice or community safety facilities’ in the definition of social infrastructure. It is noted that the term social infrastructure and the scope of facilities included in the Brent Development Management DPD mirrors the approach of the London Plan 2011 and the Further Alterations to the London Plan 2014.</p> <p>While the Further Alterations to the London Plan are not yet adopted policy the proposed changes are in line with the views of the Metropolitan Police in respect of social infrastructure and we would urge that this approach is adopted in Brent. Specifically we would suggest that draft Policy DMP44 adopts the approach of draft paragraph 3.87A of the Further Alterations to the London Plan. Paragraph 3.87A states that the loss of social infrastructure in areas of defined need may be acceptable if it can be demonstrated that the disposal of assets is part of an agreed programme of social infrastructure re-provision to ensure continued delivery of social infrastructure and related services. The supporting text to the Further Alterations goes on to state that boroughs may wish to develop collaborative approaches to the provision and delivery of social infrastructure adopting the following methodology:</p> <ul style="list-style-type: none"> <li>? Engage all relevant stakeholders and assess relevant policies and strategies;</li> <li>? Identify and analyse existing social infrastructure including its type, location, use, capacity, quality, and accessibility;</li> <li>? Identify future needs using data...;</li> <li>? Identify funding and delivery mechanisms, including opportunities for joint delivery, sources of funding, and identification of potential sites; and</li> <li>? Monitor and review the delivery of services and facilities.</li> </ul>				



We suggest that such an approach is relevant to the Brent DPD and should be included in the supporting text to policy DMP44. Our concern with draft Policy DMP44 is that it lacks the flexibility of the emerging London Plan policy and fails to acknowledge the operation requirements of social infrastructure providers such as the Police. The policy should acknowledge social infrastructure providers have their own strategies for the delivery of services which may have been subject to considerable public engagement and consultation and therefore have the same legitimacy as a Local Plan. In the case of the MOPAC / Metropolitan Police Service has an Estate Strategy 2013-2016. This strategy refreshes and builds upon an earlier Estate Strategy and reflects changes from the Police Reform and Social Responsibility Act 2011 which changed the way in which police forces in England and Wales are governed. In March 2013 MOPAC published the London 'Police and Crime Plan 2013-16' which sets out the London Mayor's strategy for tackling crime and making London safer. The plan defines the targets that MOPAC has set for the MPS including reducing key neighbourhood crimes by 20%, boosting public confidence by 20% and cutting costs by 20% to deliver £500m of savings. Alongside the 'Police and Crime Plan' MOPAC and MPS also published 'Policing and Public Access in London' which sets out the changes that will be made in the local policing estate with a particular emphasis on the availability and location of Front Counters and Contact Points. The draft 'Police and Crime Plan' and draft Estates Strategy were both subject to extensive public consultation between January and March 2013. 'Policing and Public Access in London' was informed by feedback received throughout the consultation and the revised Estate Strategy reflects the need to deliver MOAC's wider objectives.

In this context we suggest that significant changes are required to draft Policy DMP44. Firstly, the policy is vague in seeking replacement facilities to be of equivalent quality and quantity on the site or at a suitable alternative location (notwithstanding the test in paragraph 10.6). Any decision about replacement facilities needs to be within the context of the relevant social infrastructure provider's own strategy. Similarly the requirement to demonstrate that there is no demand for any other suitable social infrastructure on the site also fails to recognise the estate strategies of providers where there is a reliance on securing an appropriate capital receipt on disposal which can be re-invested in service delivery. Consequently the Council's preference for affordable housing where the loss of social infrastructure is considered acceptable is also likely to be contrary to the provider's estate strategy. The Council's proposed tests to demonstrate that social infrastructure is no longer needed, which are set out in paragraph 10.5 are unduly onerous and without adequate foundation.

#### Council Response

The criteria set out in paragraph 10.5 is consistent with the requirements of London Plan policy 3.16 and the NPPF. However, it is accepted service providers could reasonably satisfy part b of DMP 44 by providing evidence in the form of service delivery strategies which have been subject to public consultation. Accordingly this has been clarified in supporting text and reference included to paragraph 3.87A of the FALP. The NPPF requires Local Planning Authorities to make every effort to meet housing needs. Brent has a significant need for affordable housing as set out in the West London Strategic Housing Market Assessment. Accordingly, the council must seek to maximise the delivery of affordable housing where viable. The council's approach to affordable housing and viability is set out in policy DMP 36.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Loss of Social Infrastructure	DMP 44	Shell Grayson	NorthWestTWO
<b>Comments</b>				
We call for a dedicated, specific policy relating to protection of public houses, most notably those that can be demonstrated to serve the local community in more ways than simply serving drinks.				
The NorthWestTWO Residents' Association has at least 600 people on its list and covers an area adjacent to a threatened pub (The Queensbury, 110 Walm Lane, NW2). We know first hand how beneficial a good public house is, and feel very keenly the impending loss should the developer succeed in demolishing it. We have also witnessed the loss of several other pubs in our immediate area as well as more widely across London. Communities are not served by the loss of amenities, and it is time that pubs in Brent were offered a chance of protection from the developer's bulldozer.				
Pubs are closing at an alarming rate, particularly in London. In Willesden alone, five have closed in the last five years, including three that changed to residential				



or another class of use.

The council has been voted in to serve our needs, which includes protecting our community assets. Why is there a specific policy proposed for certain class uses (takeaways, betting shops and shisha cafes) yet nothing around pub protection? Pubs are a quintessentially British establishment and in the modern world do more than just serve beer. The Queensbury, for example, hosts parent and child events, many other community groups, and supports events throughout the wider community, helping glue us all together.

There is so little protection afforded to pubs that even with though we listed The Queensbury as an Asset of Community Value with Brent Council, this means very little in the current fight against development. The Department for Communities and Local Government has issued advice about writing ACV status into planning law to help protect loved establishments such as pubs from facing this situation in the future. It would be good if this was also recognised in the Council policy.

With a pub protection policy in place, the aggressive development of 110 Walm Lane may never have been proposed. And even if it was still proposed, then a policy that ensures rigour would have established the value of the building early in the process, saving almost a year of work and much anguish in the local community.

The proposed DMP 'social infrastructure' amendments are not sufficient. Simply adding "and public houses" on the end of a list of buildings deemed to be community infrastructure means nothing, and is an ineffective and insufficient substitute for a dedicated pub protection policy.

Brent acknowledges the need to guard against the unnecessary loss of valued facilities and services, but is currently not taking the appropriate steps to do so. DMP 44 states that loss of social infrastructure, including redundant premises and land, will only be acceptable in exceptional circumstances where: a. a replacement facility of at least equivalent quality and quantity is provided on the site or at a suitable alternative location; or b. it can be demonstrated there is no longer a need for the social infrastructure facility. Taking The Queensbury as an example, it is highly likely that officers would have reached the same conclusion within the policy above as they did in March 2014, recommending its demolition.

The consultation also reads that "in keeping with the NPPF, public houses are classed as social infrastructure and proposals which would result in their loss will be subject to this policy and town centre policy DMP 3 'Neighbourhood Centres and Isolated Shop Units" However the latter policy makes absolutely no reference to public house. Hence this will be easily evaded at planning decision and appeal stage.

If Brent Council is serious about protecting its public houses, it should create a policy that will be effective, as so many other local authorities have done. Indeed, the best strategic plans (for example those adopted by Cambridge and Lewisham) also include a register of public houses within the authority.

It is commendable that Brent Council is acting to change its policies and in so doing is listening to the local people. Please hear our views here: so many pubs are vital to what binds us together as a community, and we need policies in place to help us protect them

#### **Council Response**

A specific pub protection policy has been added to the DMP in response to comments.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Paragraph	10.7	Sarah Chaudhry	Property & Projects Dept, Brent Council
<b>Comments</b>				
"the introduction of the localism act 2011 provided a new right for residents to nominate certain local public or privately owned buildings or land for recognition as being as asset of community value..... The council will give significant weight to the protection of designated assets of community value." Would seek clarity on this point.				
<b>Council Response</b>				
Supporting text clarifies the protection of assets of community value will be given weight. A decision will therefore be made on balance taking into account the designation, and other relevant material considerations.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Paragraph	10.8	Anon	Anon
<b>Comments</b>				
I completely agree that pubs that close should be made into community assets.				
<b>Council Response</b>				
A specific pub protection policy has been added to the DMP in response to comments.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Location of Social Infrastructure	DMP 45	Anne Clements	Quintain
<b>Comments</b>				
Paragraph 10.9 promotes the provision of social infrastructure in Growth Area s whereas the policy wording and that of paragraph 10.11 suggest that town centres are the appropriate locations. This potential confusion should be clarified.				
<b>Council Response</b>				
10.9 states outside of growth areas town centres are suitable locations. The Core Strategy and Site Specific Allocations already identifies locations for social infrastructure in growth areas.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Schools	DMP 46	Stuart Murray & Jon Aubrey	Transport for London
<b>Comments</b>				
As currently worded, point (b) of this policy suggests that schools will be permitted if they are proposed on an allocated site even if their transport impact is unacceptable. The reference to site allocations should be removed as an assessment of transport impacts will be necessary for all applications for new or expanded schools, irrespective of location.				
<b>Council Response</b>				
Schools policy has been removed as it repeats policy in the NPPF and London Plan, and does not add anything locally specific.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Schools	DMP 46	Sarah Chaudhry	Property & Projects Dept, Brent Council
<b>Comments</b>				
Similar to the treatment of residential and affordable provision, would be good to see that where the demand for schools can be proven to be significant, this demand is prioritised over protection of existing use. We note provision within policy around temporary classrooms being time limited.				
<b>Council Response</b>				
Under London Plan policy 3.16 should it be demonstrated there is no longer a need for one form of social infrastructure, developers must explore if the site could not be used for another form of social infrastructure. This would include educational uses. For clarity specific reference has been added to educational uses in supporting text.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Schools	DMP 46	Heidi Clarke	Sport England
<b>Comments</b>				
<p>School and educational sites often provide important or potentially important sports facilities to local communities. Sport England encourages increasing accessibility through the development of dual use arrangements and is pleased to see that this has been recognised in Policy DMP 46.</p> <p>The development and implementation of Community Use Agreements (CUAs) can help support well-managed and safe community access to sports facilities on educational sites. As well as widening access to facilities and providing clarity on their use CUAs can help to enhance links between educational establishments and sports clubs. Sport England has developed a template for a CUA which provides a clear basis for drawing up agreements for individual schools, colleges and academies. The template covers how the CUA is intended to operate, covering such matters as hours of availability, management arrangements, pricing policy etc. CUAs can be secured through the use of planning conditions or preferably a s106 Agreement.</p> <p>The template CUA is available at: <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/community-use-agreements/">www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/community-use-agreements/</a> Sport England has also produced toolkits to help open up school sites for community use. The toolkits are available at: <a href="http://www.sportengland.org/facilities-planning/accessing-schools/">www.sportengland.org/facilities-planning/accessing-schools/</a> This approach is supported by the NPPF (paragraph 70) which requires that policies and decisions “should plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.” The Council may wish to include an additional paragraph after the Policy to explain how it will be implemented and the dual use of school facilities secured (i.e. through the use of planning conditions or a s106 Agreement as described above).</p>				
<b>Council Response</b>				
Noted. Paragraph on Community Use Agreements added for clarity.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Playing Pitches	DMP 47	Sarah Chaudhry	Property & Projects Dept, Brent Council
<b>Comments</b>				
Flexibility to develop in certain circumstances noted, would be good to see planning policy reflect EFA standards of double or triple counting areas such multi-use sport and recreation facilities.				
<b>Council Response</b>				
DMP47 repeated the NPPF. Local Plan policies should providing local policy and not repeat national policy, accordingly this policy has been removed and instead the NPPF is cross referenced in the supporting text.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 10: Social Infrastructure	Playing Pitches	DMP 47	Heidi Clarke	Sport England
<b>Comments</b>				
Sport England supports Policy DMP 47 and is pleased to see its inclusion in the Development Management Policy as it reiterates the exceptions set out in Sport England's Playing Field Policy albeit it excludes Exception E1. Exception E1 permits the loss of playing field where a carefully quantified and documented				

assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport. It's understood this has been omitted because text preceding policy DMP 47 advises that the most recent sport and active recreation facilities strategy undertaken by Brent Council identified a significant need for additional sport facilities specifically a need for football, rugby and Gaelic football pitches. Therefore Sport England understands its omission. However Sport England would recommend that for clarity the policy be entitled Playing Fields as opposed to pitches and the first sentence should read Development on playing fields will only be allowed in exceptional circumstances where: .....

Within the glossary there should be a definition of both playing field and playing pitch as follows: A playing field is an area containing at least one playing pitch (0.2 ha or more, including run-offs), irrespective of ownership.

A playing pitch means a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounder's, baseball, softball, Australian football, Gaelic football, shanty, hurling, polo or cycle polo as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 Sport England also supports paragraph 10.19 however would suggest that it is rephrased as such:

- Change from: The policy also applies to former playing pitches, including non-pitch based and ancillary facilities, or parts of playing pitches which are currently dis-used or under-used.
- Change to: The policy also applies to former playing fields which have been under-used or dis-used in recent years. It also applies to parts of playing fields where pitches have not been marked out and where ancillary facilities are present.

#### Council Response

DMP47 repeated the NPPF. Local Plan policies should providing local policy and not repeat national policy, accordingly this policy has been removed and instead the NPPF is cross referenced in the supporting text. Definition in glossary has been amended as suggested.

## Chapter 11: Delivery & Monitoring

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 11: Delivery & Monit			Anne Clements	Quintain
<b>Comments</b>				
It is accepted that monitoring targets are not policy but in order to demonstrate success against those targets greater clarity would be helpful as follows: Table 8 – Sustainability The number of residential units triggering the need for micro-generation should be clarified. It is not viable to implement micro-generation for too few units. Table 10 – Housing The target for the proportion of affordable housing should be amended as follows: “50% of all new housing to be affordable, subject to viability testing and taking account of CIL contributions.”				
<b>Council Response</b>				
Table 8 - Monitoring point will not be taken forward. Table 10 - already monitored under Core Strategy therefore will not be duplicated here.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 11: Delivery & Monit		Table 4	Anon	Anon
<b>Comments</b>				
Annual inspections? Way to go!				
<b>Council Response</b>				
Noted.				

## Appendices

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Appendices	Parking Standards	APX 2	Stuart Murray & Jon Aubrey	Greater London Authority
<b>Comments</b>				
The appendix states: For new residential development, a minimum of 5% of parking spaces provided for private units should be dedicated to disabled use. 20% of parking spaces provided for affordable units should be dedicated to disabled use. The London Plan requires 10% of all new homes to be wheelchair accessible or easily adaptable for occupation by a wheelchair user. This policy references the 'Wheelchair Housing Design Guide' which requires one parking bay for every wheelchair accessible or easily adaptable home (so 10% of the total number of residential units). The Guide also notes that grouped car parking serving multi-storey or low-rise high-density developments should be provided on the basis of management arrangements that could provide at least one designated wheelchair space per wheelchair user dwelling. These spaces, whether off street or kerbside, should be of the required size to enable transfer between the car and an adjacent pavement or hardstanding. For all other uses, a minimum of 5% parking spaces should be dedicated to disabled use.				
<b>Council Response</b>				
Noted. The standards reflect Brent's situation.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Appendices	Parking Standards	APX 2	Robert Dunwell	QARA
<b>Comments</b>				
Table 12 –this should duplicate that guidance as given in the London Plan. Table 15 and accompanying text – table and text should be altered so as to only refer to NEW Development Sites.				
<b>Council Response</b>				
New development sites could be open to interpretation, whereas 'development' is defined in the Town and Country Planning Act and widely understood.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Appendices	Parking Standards	APX3	Anne Clements	Quintain
<b>Comments</b>				
No evidence base is shown for the standards proposed. Evidence should be added to justify the standards proposed. The standards appear arbitrary and could lead either to inefficient use of land or to development having an inappropriate amount of servicing. For example, B1 business developments under 300sqm are required to provide one loading bay whereas retail developments over 200 0sqm are required to provide one full size bay. One is inefficient and one may lead to an under provision. Servicing provision should be informed by the output from the Transport Assessment having regard to the trip generation; the types of vehicles predicted; their transport distribution; their dwell time; and the operation of the specific building under consideration. The Appendix should be redrafted to allow greater flexibility and having regard to the output from the Transport Assessment.				
<b>Council Response</b>				
Servicing standards have been amended for consistency and to reflect standards in the UDP which are currently applied.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
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Appendices	Heritage Assets	APX1	Dilwyn Chambers	N/A
<b>Comments</b>				
A heading possibly Neasden/Cricklewood seems to have been omitted. The only heritage asset of world significance in Brent has been omitted, the Cabinet War Rooms in Brook Road. The Council hasn't enforced a planning requirement that the public have access at least twice a year. It could be put forward as a World Heritage Site. The location is near the site of the former holiday residence of William Gladstone and the associated stables. The sables have also been omitted. They were on the statutory list because they were within the curtilage of Dollis Hill House.				
<b>Council Response</b>				
The list of heritage assets will be removed from the appendix of the DMP and instead maintained on the conservation webpages where it can be regularly updated as additional buildings are listed or locally listed. The list will be corrected accordingly. Any breach of planning conditions should be reported to the Council's Enforcement Team for investigation.				

<b>Chapter</b>	<b>Section</b>	<b>Policy/Para No.</b>	<b>Full Name</b>	<b>Organisation Details</b>
Appendices	Heritage Assets	APX2	Dilwyn Chambers	N/A
<b>Comments</b>				
Kingsbury Police Station has been demolished. It might be purposeful to clarify whether flats are to be built on the site.				
<b>Council Response</b>				
This is outside the scope of the DMP.				

<b>Chapter</b>	<b>Section</b>	<b>Policy/Para No.</b>	<b>Full Name</b>	<b>Organisation Details</b>
Appendices	Heritage Assets	APX1	Dilwyn Chambers	N/A
<b>Comments</b>				
Some years ago I drew the attention of the Council to the disappearance of the three telephone kiosks on Empire Way. It may be assumed they were removed by Quintain, when they were refurbishing the entrance to the Arena. I failed to obtain any information as to what happened to them.				
<b>Council Response</b>				
This is outside the scope of the DMP. The issue is being followed up with Quintain.				

<b>Chapter</b>	<b>Section</b>	<b>Policy/Para No.</b>	<b>Full Name</b>	<b>Organisation Details</b>
Appendices	Glossary	APX4	Anne Clements	Quintain
<b>Comments</b>				
The definition of Decentralised Energy Network should be clarified and the definition for a Shared Energy Network should be added showing clear differentiation. Both are referred to in the Sustainability Section. Local Centres, Neighbourhood Centres and Local Shopping Parades appear to be the same. Could the definitions be consolidated? Major Town Centres are not defined. The definition for Open Space is vague and could include car parks as drafted currently. Is this intended? Should the London Plan be referenced under the definition of PTAL? Appropriately, more than one Primary and Secondary frontage is shown on the Policies Map. However, the definition refers to 'It' in both instances. Should this be amended to 'These'?				
<b>Council Response</b>				
1. Chapter no longer includes reference to Shared Energy Network. 2. Definition of town centres removed as this is included in Core Strategy and does not need				



to be repeated here. Clarity added to definition of local parades. 2. PTAL is identified on a TfL website which is separate to the London Plan. reference to this website will be added for clarity. 3. Definition of open space used is from the London Plan and consistent with the NPPF. 4. The policies map indicates existing and proposed primary and secondary frontage. This is included in the key.

## Sustainability Appraisal

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Sustainability Appraisal	Sustainability Appraisal	/	Claire Craig	English Heritage
<b>Comments</b>				
<p>English Heritage regrets to advise that we were unable to ascertain the connection between the appraisal matrices provided and the Development Management Policies. The appraisal matrices provided to us appeared to refer to UD policies rather than DM policies and therefore it appears to us that no appraisal of the policies in the consultation document provided has been undertaken.</p> <p>English Heritage notes the reference in paragraph 6.11 on page 113 of the SA to a relationship between the borough's Core Strategy and policies contained in a Promoting a Quality Environment chapter but we have not been able to locate a chapter of this nature in the DM policies document or make a reasonable correlation to the policies in the document being consulted upon. English Heritage is unsure as to whether the borough is seeking to rely upon the SA undertaken for the Core Strategy and for us to extrapolate this to the DM Policy document in some way – and if this is the case we must advise that we need this to be set out more explicitly so that we might more readily draw the connections between the two.</p>				
<b>Council Response</b>				
<p>The confusion has arisen due to the changing in numbering and structure as the document has progressed. Part B contains a table for reference indicating how the policy numbering has changed. For clarity this table has been inserted in the introduction of part A for clarity.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Sustainability Appraisal	Sustainability Appraisal	/	Eleri Randall	Environment Agency
<b>Comments</b>				
<p>We are pleased to see that many of our previous comments on the SA Scoping report have been noted or included. However, we feel that greater emphasis should be given to the Water Framework Directive (WFD) and the London Borough of Brent's role as the Lead Local Flood Authority (LLFA) as indicated above for the Development Management Policies also.</p> <p>In Table 4: p.32 List of Key Regional plans and programmes reviewed and implications for the DPDs and SA – we would have liked to have seen the All London Green Grid (ALGG) and ALGG Area Frameworks which includes the Brent Valley in this table.</p> <p>On p.50 the Water quality, water resources and flooding section should include reference to the quality of the water environment i.e. overall WFD assessment and objectives to achieve Good Ecological Potential by 2027. This is a headline aspect of achieving sustainability for the environmental quality across the borough and ties together many of the new responsibilities for London boroughs as LLFAs. In addition section 3.39 should highlight that the WFD is not just a classification tool but also a framework for improving the water quality and creating more sustainable approaches to managing the water environment in the London Borough of Brent. The three Brent WFD water bodies are all designated as 'Heavily Modified' not 'provisionally classified' as stated in the text and therefore have objectives to achieve Good Potential (not status) by 2027.</p> <p>In section 3.40 the Brent River Corridor Improvement Plan (April 2014) should be highlighted in this section as a mechanism by which Brent will be contributing towards achieving sustainability objectives for improving water pollution both in river corridor and across the wider catchment.</p> <p>In section 3.42 the role of the London Borough of Brent as the LLFA and SuDS Approval Body is critical in helping towards sustainable management of localised surface water flooding. This role will help Brent to be more resilient to future flood events and potential increased risks associated with climate change.</p>				

On p.63 Table 7 the Summary of key sustainability problems: Environmental pt.9 – reference to habitats could refer to terrestrial and aquatic habitats in the borough.

This Water quality, water resources and flooding section has missed an opportunity to highlight significant work being undertaken in the London Borough of Brent to achieve sustainable development within the river corridor and wider catchments that will improve water quality, water resources and reduce flood risk; as well as improving the water environment. The inclusion of WFD and the Brent River Corridor Improvement Plan objectives would provide a strong platform to help achieve sustainable outcomes for the River Brent Corridor and Catchment within Brent.

In Table 10 promoting a quality environment – alternative options not selected,

Policy DP ENV5:Water To require SuDS to be part of all developments. As many developments as possible should include SuDS methods and we would state that consideration of SuDS is not a strong enough alternative. Developments should be using the SuDS hierarchy with strong justification if SuDS cannot be included. Some local exceptions, for example Critical Drainage Areas identified in your Surface Water Management Plan could have the requirement for SuDS to be part of all development.

#### Council Response

Noted. Amendments made as requested.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Sustainability Appraisal	Sustainability Appraisal	/	Dr Michael GP Maguire	

#### Comments

##### 1.Travellers and Gypsies

1.1 The Sustainability Appraisal has failed to properly evaluate the draft Plan's failure to make appropriate provision for the very specialised housing needs of Travellers (Irish and Scottish) and Gypsies (Romany, Roma and Sinti).

1.2 Given that these are socio -cultural ethnic minorities, subject to discrimination and socio -economic disadvantaged status, this Sustainability Appraisal omission could represent 'indirect discrimination'; contrary to both British and European human rights and anti-discrimination legislation.

1.3 In so far as I can ascertain, from the very lengthy Sustainability Appraisal documents, the only reference to considering, whether the Development Management Policies should specifically provide for, the very particular land use and spatial planning needs of Travellers and Gypsies is the very brief statement in Part 2, page 177.

1.4 A reference which is not apparently supported by any up to date empirical information; unlike the data supporting other housing needs.

#### Council Response

Core Strategy Policy 22 sets detailed policy for gypsies and travellers. Policy CP 22 protects the existing Lynton Close Travellers Site and criteria which will be applied in assessing applications for traveller sites. It is considered a Development Management Policy could not go any further than policy CP 22, however, on review of the Site Specific Allocations DPD a further site will need to be identified and allocated.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Sustainability Appraisal	Sustainability Appraisal	/	Dr Michael GP Maguire	

#### Comments

Having looked at the Development Management Policies and Sustainability Appraisal documents it is clear that these have been put together in the manner that would be expected in terms of the approach and methodology used in drawing up the documents to this stage. Given that Brent Reservoir Site of Special Scientific Interest (SSSI) is partly within the borough it does have to be taken into account when considerations are made on new development in and around this site in order to keep the sites features of interest in favourable condition which they currently are. The effects of cumulative impact of development upon the designated site from the area around it and of course on any Natura 2000 sites further away should also be factored in as these will potentially need to be

considered even if they can be ruled out as not being impacted.

The Sustainability Appraisal correctly recognises the Welsh Harp Reservoir (Brent Reservoir SSSI) as being an issue for the borough in terms of flood risk and flooding under Point 14 in Table 7. This needs to be taken into account in the surrounding area when it comes to new development or re-development as appropriate Sustainable Urban Drainage Systems (SUDS) will need to be put in place.

#### Council Response

Noted.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Sustainability Appraisal	/	Piotr Behnke	Natural England

#### Comments

Development Management Policies (DMP) document and SA:

Having looked at the Development Management Policies and Sustainability Appraisal documents it is clear that these have been put together in the manner that would be expected in terms of the approach and methodology used in drawing up the documents to this stage. Given that Brent Reservoir Site of Special Scientific Interest (SSSI) is partly within the borough it does have to be taken into account when considerations are made on new development in and around this site in order to keep the sites features of interest in favourable condition which they currently are. The effects of cumulative impact of development upon the designated site from the area around it and of course on any Natura 2000 sites further away should also be factored in as these will potentially need to be considered even if they can be ruled out as not being impacted.

The Sustainability Appraisal correctly recognises the Welsh Harp Reservoir (Brent Reservoir SSSI) as being an issue for the borough in terms of flood risk and flooding under Point 14 in Table 7. This needs to be taken into account in the surrounding area when it comes to new development or re-development as appropriate Sustainable Urban Drainage Systems (SUDS) will need to be put in place.

#### Council Response

Noted.

## General

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	General	General	Brent Friends of the Earth	Brent Friends of the Earth

#### Comments

In conclusion, we are aware that the GLA requires councils to consider the effects of developments on neighbouring boroughs. The recent case of the approval by Barnet Council of the development adjacent to the Welsh Harp has illustrated the fact that this requirement is not very effective. A similar problem could arise in the case of developments at Brent Cross and with Ealing Council and the application for a waste incinerator. We suggest that there is a case for including a reference to the need to work jointly with other councils and also considering, promoting a policy through the GLA that such planning applications affecting neighbouring boroughs should be jointly determined by a combined planning committee.

#### Council Response

Local Planning Authorities have a duty to co-operate under the Localism Act 2011. Brent Council is a statutory consultee and as such consulted on planning applications for neighbouring boroughs.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
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	General	/	Dr Michael GP Maguire	
<b>Comments</b>				
<p>Need For Additional Policies</p> <p>In addition to the already identified need for further specific dedicated policies, there is also a requirement for specific policies on :  Brownfield Site Priority Development, to emphasise that the required new housing development will be developed on 'Brownfield sites' (previously built upon) and that 'Greenfield site' development (previously unbuilt) will only be permitted in exceptional circumstances. Very Large Housing Sites, recognising the specific additional requirements for building more than 100 homes, as per Policy DPH 8.</p>				
<b>Council Response</b>				
<p>The Core Strategy and Site Specific Allocations DPD direct development to brownfield sites by focusing development in the boroughs growth areas and allocating sites accordingly. The NPPF and Core Strategy policy protect open space from development and preserve it for the enjoyment and well being of residents, visitors and wildlife. The NPPF states local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land. Given the policies in place to protect open space and promote development on brownfield land it is not considered an additional brownfield site policy is required.</p>				

<b>Chapter</b>	<b>Section</b>	<b>Policy/Para No.</b>	<b>Full Name</b>	<b>Organisation Details</b>
	General	/	Simon Watkins	Hub Architects
<b>Comments</b>				
<p>1. CP13 Code Level 3 for housing does not tally with the Mayor of London's London Housing Design Guide where the target is currently Code Level 4.  2. BREEAM "Excellent" is a very costly target to meet if applied to the change of Use and conversion of existing commercial properties, and may therefore discourage development.  3. Shopping frontages : Brent shopping frontages are blighted by the proliferation of estate agent's boards - A policy preventing their erection would be welcomed.  4. Car parking that serves local shopping centres should be protected from development - Research shows that their loss results in a loss in footfall to local shopping centres.  5. On-street parking on shopping frontages should be protected and well managed as it supports trade in local shops.</p>				
<b>Council Response</b>				
<p>1 and 2 - policy and Code Level and BREEAM is contained within the Core Strategy and have been tested at examination. 3. Under permitted development rights chartered surveyors, auctioneers and valuers, can advertise that land or premises are for sale or to let, providing certain conditions are met. If the sale or letting is for residential use or development, the advertisement board must not exceed 0.5 of a square metre, or a total area of 0.6 of a square metre for two joined boards. No advertisement board is allowed to extend outwards from the wall of a building by more than 1 metre. In each case only one board may be displayed on premises and this must be removed not later than 14 days after completion of the sale or granting of the tenancy. If boards are not displayed within these parameters the Council can take enforcement action. 4 and 5. The Transport chapter contains policy to prevent a loss of town centre car parking where this would result in underprovision.</p>				

<b>Chapter</b>	<b>Section</b>	<b>Policy/Para No.</b>	<b>Full Name</b>	<b>Organisation Details</b>
	General	All	Angela Gemmill	Maritime Management Organisation
<b>Comments</b>				
<p>The MMO's remit covers English territorial waters and any river up to the extent of the mean high water springs mark. Our maps indicate that the area in question does not include either coastline or any stretch of river under tidal influence. The MMO therefore has no comments to submit in relation to this</p>				

consultation.
<b>Council Response</b>
Noted.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Other	Performance Measure	Claire Craig	English Heritage
<b>Comments</b>				
<p>Similarly, English Heritage requests that the Borough consider its Performance Measure concerning micro-generation to ensure that it will not lead to inappropriate applications for types of micro-generation that could harm the significance of heritage assets. For example, solar panels on visible elevations of heritage assets cause harm to the significance of those assets but, if located appropriately on flat roofs or elsewhere on the property with screening, can achieve both sustainability objectives. In addition, combined heat and power units, if sensitively located can also be a good form of micro-generation as opposed to a wind turbine which can tend to visually dominate in its surroundings.</p> <p>English Heritage notes the Performance Measure concerning housing numbers within the Further Alterations to the London Plan (FALP). English Heritage has raised concerns about the proposed alterations to the town centres policy in the FALP on the basis that without amendment they could lead to substantial harm to London's historic environment. In the London Borough of Brent, English Heritage is particularly concerned to ensure that Willesden Green is planned for in a way that conserves and enhances its historic environment and we would be interested to understand how the Borough proposes to address the Mayor of London's proposals for its town centres.</p>				
<b>Council Response</b>				
The performance measure has now been removed.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Other	Legal Considerations	Stuart Murray & Jon Aubrey	Transport for London
<b>Comments</b>				
<p>All LDDs must be in general conformity with the London Plan in accordance with Section 2403(b) of the Act. This is a key test of the soundness of plans. The Mayor's representations made at this stage will be considered by the Council before they produce the next version of the DPD (Pre-submission). The fact that a development plan document is inconsistent with one or more policies in the London Plan, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is how significant the inconsistency is from the point of view of delivery of the London Plan.</p>				
<b>Council Response</b>				
Noted.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Other	/	Jennifer Cameron	N/A
<b>Comments</b>				
<p>I do feel, however, that a little over a month was a very short consultation period for such an important document that's been so long in preparation. I wonder whether local shop owners knew about it? None that I have spoken to in Willesden Green did. As it is now too late to gather their views, I will limit my comments</p>				

to sections where I have knowledge or experience relevant to assessing the impact of the proposed policies.

#### Council Response

The consultation period is prescribed in the Town and Country Planning (Local Planning) Regulations 2012. For the consultation process to be in accordance with the regulations and valid it cannot last longer than 6 weeks.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Other	Water	Chris Colloff	Thames Water

#### Comments

Thames Water considers it essential that the Development Plan makes reference to the provision of adequate water and sewerage infrastructure to serve development to avoid unacceptable impacts on the environment. It is important not to underestimate the length of time required to deliver necessary infrastructure. Local network upgrades can take 18 months to 3 years to deliver, strategic infrastructure solutions can require 3 to 5 years and the implementing of new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years from the point of certainty of delivery and the securing of funding, and the precise nature, scale and location of development. Therefore the phasing of major development will be crucial. The adopted Core Strategy does not contain any policies on water and wastewater infrastructure although Policy CP15 in relation to utilities infrastructure requires that "Before granting planning permission for major proposals, the council will have to be satisfied that the infrastructure requirements arising from the scheme will be met by the time it is needed.". However, the policy and supporting text do not set out how this will be achieved in relation to water and wastewater infrastructure.

In relation to the impact on sewerage infrastructure Policy WEM33 of the submission Wembley Area Action Plan states that: "Developers will also be required to demonstrate whether there is sufficient capacity both on and off site in the foul sewer network to support development. Where insufficient capacity exists developers will be required to identify how any necessary upgrades will be delivered ahead of the occupation of development."

Policy WEM33 will help to ensure that any necessary sewerage infrastructure network upgrades required to support development will be delivered in advance of the occupation of development. However, as the policy only applies to the area covered by the Wembley Area Action Plan it is considered that a similar policy is required within the Development Management Policies DPD to ensure that the issue is addressed at a borough wide level. It is therefore requested that the following policy and supporting text is included within the Development Management Policies DPD:

"PROPOSED POLICY - WATER AND SEWERAGE INFRASTRUCTURE CAPACITY:

Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:

1. sufficient capacity already exists or
2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenity of local residents are not adversely affected.

When there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development."

Proposed new policy supporting text:

"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users. In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is a capacity constraint and no improvements are programmed by Thames Water (or any successor), the Local Planning Authority will require the developer to provide for appropriate improvements that must be completed prior to occupation of the development."

#### Council Response



It is considered the proposed policy repeats London Plan policy 5.14 Water Quality and Wastewater Infrastructure. The London Plan forms part of Brent's Development Plan, and therefore this policy is a material consideration in determining planning applications.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
General	General		Dilwyn Chambers	N/A
<b>Comments</b>				
Noted however the DMP cannot influence the cost of public transport, or how payments are made. The Council continues to regularly engage with Transport for London and London Buses to ensure the borough is well served by public transport. Disagree that the Council favours car users. The DMP transport policies seek to promote sustainable modes and limit car use.				
<b>Council Response</b>				
This is outside the scope of the DMP.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
General	General		Dilwyn Chambers	N/A
<b>Comments</b>				
In summary: The Vestry Hall is omitted. It would provide an excellent location for a display on the history of the Anglican Church in Willesden. Questioned ownership of building.				
<b>Council Response</b>				
The Vestry has been locally listed by the Council. An application would need to be submitted to Historic England to consider listing Vestry Hall. The list of heritage assets will be removed from the appendix of the DMP and instead maintained on the conservation webpages where it can be regularly updated as additional buildings are listed or locally listed.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
General	General		Dilwyn Chambers	N/A
<b>Comments</b>				
Wembley Park Lodge (114 Wembley Hill Road) has been extensively damaged by fire. I hope that pressure will be brought by the council to ensure its restoration. Other historic buildings damaged by fire have been demolished.				
<b>Council Response</b>				
Noted. In line with the proposed Brent's Heritage Assets policy such buildings should be retained and enhanced the building as far as possible. An assessment will need to be made as to whether it is safe and feasible to retain the building depending in the level of damage.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
		All	Rosmarie Macqueen	City of Westminster Council
<b>Comments</b>				
No identification of cross borough issues arising from proposed development management policies				
<b>Council Response</b>				
Noted.				

## Site Specific

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Site Specific	Bridge Park	Jill Rennie	
<b>Comments</b>				
<p>The Bridge Park site is due to provide for housing, hotel, retail and new Leisure Centre. Bridge Park is due to deliver a new Leisure Centre through the receipt generated from selling the site for development. As such a 50% affordable housing ambition would not be possible as the Leisure Centre would not be deliverable with the receipt if 50% affordable is to be achieved. Would seek that the other social infrastructure investment is recognised when considering the affordable housing allocation for Bridge Park. As the objective is to build a hotel at Bridge Park, would want to ensure that this site for a hotel is recognised. Policy currently states that "Development likely to be used by people vulnerable to poor air quality should not be located in areas with existing very poor air quality, such as adjacent to the North Circular Road or other locations where air pollution is a recognised problem." The Bridge Park development is beside the North Circular – would seek assurances that Bridge Park is recognised as being suitable for development including hotel, housing, retail and leisure centre. Would seek confirmation that the ex-Unisys sites will not need to demonstrate that there is no demand for the site as employment space as these buildings have been sitting abandoned for nearly 20 years.</p>				
<b>Council Response</b>				
<p>Policy on affordable housing and negotiating the maximum reasonable amount of affordable housing is contained in London Plan policy 3.12 and Brent's Core Strategy. Bridge Park is allocated for mixed-use development including residential. The Unisys &amp; Bridge Park Centre is allocated for mixed use development including a hotel, therefore the requirement to demonstrate the existing employment use is not viable does not apply. In accordance with London Plan policy 7.14 development proposals in AQMAs, such as Bridge Park, should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality such as by design solutions, buffer zones or steps to promote greater use of sustainable modes through travel plans. Policy wording amended to be consistent with the London Plan.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Chapter 4: Open Space	Site Specific	South Kilburn Open Space and Cambridge Garden Playground	Marie Frederick	Property and Projects Department
<b>Comments</b>				
<p>The DPD currently incorporates the following sites as open space; 163 - South Kilburn Open space &amp; 161 - Cambridge garden playground. Within the policy it states "the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location". However this contradicts our masterplan proposals. In accordance with the attached plans, the South Kilburn Masterplan is proposing to build upon the above two sites in order to achieve our wider regeneration objectives in South Kilburn. Whilst we will always ensure high quality open space is re-provided, it may not always be the case that its quantity and quality are both increased. I would like to request that the above sites are removed from the open space classification within the DPD.</p>				
<b>Council Response</b>				
<p>It was considered this policy repeats NPPF paragraph 74. DPDs should add locally relevant policy and not duplicate national policy. Accordingly the policy has been amended to prevent duplication and instead refers to the NPPF in supporting text. Amendments to open space designations have been considered in light of comments.</p>				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Site Specific	Church End	Jill Rennie	
<b>Comments</b>				
In terms of comparable temporary market provision for markets which are being redeveloped, we would seek that comparable does not mean a like for like size as this would not always be possible. The Church End market is to be redeveloped but will have a temporary market on a smaller site				
<b>Council Response</b>				
It may be the case that market stalls can be adequately accommodated on a smaller site, but this will need to be assessed on a site by site basis.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Site Specific	Clement Close	Jill Rennie	
<b>Comments</b>				
Clement Close/Peel Road. These sites are due to be used for Adult Social Care – Independent Living, as such these sites will not receive a capital receipt to the Council and will not be used for private housing. Seek that the policy recognises that these sites are contributing to a Council portfolio of achieving affordable housing.				
<b>Council Response</b>				
Noted. However, it is not necessary to refer to these specific sites in the context of the DMP.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Site Specific	Golders Green and Mill Hill Delivery Offices		Royal Mail
<b>Comments</b>				
Golders Green Delivery Office is a Freehold Royal Mail property, which is surrounded by residential properties to the east and west. More residential properties as well as retail units are located to the south of the site, while a Police station is located on the north boundary. The redevelopment of this site for residential use may therefore be appropriate in this context in the future, in accordance with the requirement of the National Planning Policy Framework for the development of sustainable communities. Mill Hill Delivery Office is also a Freehold Royal Mail property and is surrounded by residential properties to the east and the northern boundary of the site. Opposite the site (to the south) is characterised by retail units with residential accommodation on the first floor. The redevelopment of this site for residential use (potentially as part of a mixed use scheme) may therefore also be appropriate in this context, in accordance with the requirement of the National Planning Policy Framework for the development of sustainable communities. It should be noted that the relocation/re-provision of Royal Mail's operations is essential prior to redevelopment of the site and therefore its redevelopment will not be possible unless an alternative suitable location has been found for the provision of Royal Mail's services in this area. This will ensure that Royal Mail's operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2011. Furthermore, in order for Royal Mail's sites to be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of the sites will need to yield both sufficient value to fund the purchase and fit-out of a new site and the relocation of their operations thereto. There will also need to be a commercial attractiveness that would incentivise the business to relocate the operations. In addition, it would be essential that any new facility is provided prior to the demolition of that existing, to ensure Royal Mail's continuity of service. This approach accords with adopted Government guidance set out in the National Planning Policy Statement (NPPF) (March 2012) which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The NPPF also advises that local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting. It also states that policies should be flexible enough to accommodate				

needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Paragraphs 20-21).

#### Council Response

The DMP sets out clear criteria for the managed release of employment land. This is consistent with the NPPF and London Plan policy 4.4. Any proposals for the release of employment will be assessed against this policy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Site Specific	Wembley Town Cent	Antonia Clayton	N/A

#### Comments

1. My voice can be considered the voice of the normal residents of Wembley who are upset with the traffic management during event days. In normal circumstance its so difficult for us and our guest to get space for parking specially in the area of Lancelot Road / Milford Gardens.
2. Secondly I would request for a police patrol in residential areas as we see anti social behaviour from crowds that want quite places, they clutter all the rubbish in the front of our houses.
3. Right from Wembley high road right to Milford Gardens (HA0 2AS) you will find swamps of rubbish either sides of the road everyday.
4. We need a pedestrian signal at the crossing opposite Wilkinson's, between the 02 shop and the sam99p shop.
5. The residents should be considered in the development, what I mean by this is doing something not only to beautify the main roads but the inner roads for the benefit of the residents.
6. Something to make the residents happy since we all put up with the nonsense during the whole year for event days, may be one house get a pass for one day for the year

#### Council Response

Although the comments are outside the scope of the Development Management Policies they are noted and have been passed to the relevant departments.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Site Specific	Queensbury Pub	Cllr. Dr Helen Carr	N/A

#### Comments

#### Council Response

#### Comments

I understand that Fairview Homes have appealed the decision taken by Brent Council to refuse planning consent for a block of flats on the site of The Queensbury pub.

I understand that Brent and Fairview have to find some "common ground" ahead of the inquiry and a statement of this common ground was submitted to the Inspectorate in May, although Brent Council do not appear to have signed. There are some assumptions about the "common ground." For example, that the old building does not enhance the conservation area..... and the new building will benefit the community more. There is no acknowledgement of the community of asset value issue in the 'common ground' document between Fairview and the Council.

The proposal to demolish the Queensbury Public House and Conservative Club, to be replaced with a building containing A4/D1 use unit on ground floor and 53 residential units on the ground and upper floors (13 x one bed, 30 x two bed and 10 x three bed), as well as vehicular access from Walm Lane to basement car park comprising 23 parking spaces was refused on three grounds:

The proposed development, by reason of its height, scale, massing and density, would appear unduly prominent and out of character in the street scene and in the wider locality. The development would fall to preserve or enhance the character and appearance of the Mapesbury Conservation Area in which the site is located and would adversely impact on the nearby Willesden Green Conservation Area and the setting of the Grade II Listed Willesden Green Station. As a result, the proposal fails to comply with the National Planning Policy Framework 2012; Policies 3.4, 3.5 and 7.4 of the London Plan 2011 and Revised Early

Minor Alterations to the London Plan published on 11 October 2013; Policies BE2, BE3, BE9, BE10, BE23, BE25, BE27, H12 & H13 of Brent's Unitary Development Plan 2004; Supplementary Planning Guidance 17 "Design Guide for New Development", October 2001; Mapesbury Conservation Area Design Guide.

2. The proposed development would provide insufficient provision of on-site affordable housing. As a result, the development would fail to comply with National Planning Policy Framework 2012; Policies 3.8, 3.9, 3.10, 3.11, 3.12 and 3.13 of the London Plan 2011 and Revised Early Minor Alterations to the London Plan published on 11 October 2013; Policy CP2 of Brent's Core Strategy 2010; SI 06 Planning Obligations SPD, July 2013.

3. In the absence of a legal agreement, the development would not secure a Community Access Plan, sustainability measures, job & training opportunities for local residents, adherence to the Considerate Contractors Scheme, a Travel Plan and restrictions to prevent future residents from applying for parking permits. As a result, the proposal fails to comply with the National Planning Policy Framework 2012; Policies 3.16, 4.6, 5.2, 5.3, 5.6, 5.7, 5.9, 5.13, 6.3, 6.13, 8.2 of the London Plan 2011 and Revised Early Minor Alterations to the London Plan published on 11 October 2013; Policies CP19 and CP23 of Brent's Core Strategy 2010; Policies EP2, EP14, TRN3, TRN4, TRN10, TRN23, TRN34  
Etc.

How has this situation changed?

I appreciate a right of Appeal. However there seem to be no new grounds for Appeal. I appreciate the stress on affordable housing and accommodation, but the stress on housing and accommodation has not increased since the initial application, nor since the initial refusal.

I emphasise and re issue the existing arguments which are regarding the value of a community facility. I fail to understand how the proposal will benefit the community in anyway.

This proposal does not address the issue of affordable social housing.

This is in a Conservation area. Might we remind you that Brent Council and Mapesbury residents successfully applied in 2010 to protect the rear gardens from development via an Article 4 (1) Direction with almost 1,000 residents signing a petition in support of the application to the Secretary of State.

· The proposed block of apartments would detract from the openness of the setting, leading to an overcrowded, cramped appearance which would be visually jarring and at odds with the prevailing pattern of the housing and neighbouring gardens. The development would lead to the loss of open street frontage – a key issue in a Conservation area. The proposed building would jeopardise a principal characteristic of the Conservation Area, i.e. the sense of openness and spaciousness.

The proposal fails to enhance or even preserve the character of the Mapesbury Conservation area.

The proposal does not complement and is not sympathetic to the character of the Mapesbury Conservation area.

‘Community’ is a much misused and overused term these days. In its broadest sense, it refers to any group of people united by a community of interests. In this sense, the Queensbury is quite correctly defined as a ‘community asset’ because it hosts a range of professional, residential, clubs, and associations who meet there formally and informally.

The term ‘community asset’ is also employed in phrases such as ‘community participation’ and ‘community project’ and so on where there is a commitment to interests and the welfare of a majority or sectors of society, and consequently, to policies and strategies of grass roots involvement in the planning and execution of individual projects or more generalised programmes. In this way, political power is devolved and decentralised – a key component of any healthy democracy ‘Community’ means face to face, personal relations in a small scale social network or residential network as opposed to the more impersonal or contractual relationships that characterise the relationships of modern industrial and urban society. This is why The Queensbury is a ‘community asset.’ The Queensbury is significant beyond an eateries and a pub. We do not want such community assets to be gobbled up by blocks of flats rendering the area boring and lifeless.

Despite a desperate housing shortage in Blitz ravaged London, post WW2 architects and planners recognised the need to create or preserve meeting places such as The Queensbury, and so should we.

Quite simply, The Queensbury is a place where people of all race, colour, ethnicity or national origin, gender, nationality, marital status, parental status, HIV

status, class, disability, sexual orientation, gender reassignment, age, criminal convictions, religious belief, political persuasion or trade union activity can meet. I ask you to respect the decision of previous colleagues and Councillors and again reject any proposal to replace The Queensbury with a block of flats. In addition, I ask Brent Council to adopt a specific 'pub protection' policy, similar to those in other local authorities. This does not "save" all pubs from demolition, but does enable the planning committee to properly scrutinise applications when change of use is proposed. As I understand it, campaigners met officers and the Leader of the Council last year, and all seemed sympathetic to this request. However, there is no proposal in current consultation on Development Management Policies to adopt such a policy. I would request Brent Council considers a specific policy that protects our valued public houses, such as The Queensbury.

#### Council Response

The DMP now contains a specific pub protection policy.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Site Specific	Staples Corner	N/A	DLP Planning Consultants on behalf of Datemove an Addmargin Ltd

#### Comments

##### 6.0 SUMMARY AND CONCLUSIONS

Key Reasons for promoting a mixed use scheme at Coles Green Road, Brent

6.1 The proposed development would bring the following benefits to the London Borough of Brent:

? It is a development site that is available, achievable and deliverable within a short timeframe; No existing employment operations will be lost and the proposed scheme will offer an increase in the number of jobs created over the existing underutilised employment use. It has been assessed as a suitable housing site which can be sensitively designed around a number of employment uses; It will provide for around 66 homes, with provision for affordable housing; A notable contribution towards the five-year housing supply required in the London Borough of Brent; The creation of a significant level of new green infrastructure and biodiversity enhancements. The proposal would support existing local leisure facilities, shops, employment and areas for recreational land; indeed it will supplement community facilities; Technical studies have been initially scoped to include, transportation, daylight and sunlight, flooding and drainage and have concluded that there are no constraints affecting the ability to deliver development at the site.

##### Conclusions

6.2 These representations have been prepared by DLP Planning Consultants on behalf of NTC to demonstrate this site can offer a sustainable alternative employment provision without impacting the delivery of other employment uses sought by the Council and that this is an appropriate potential mixed employment and housing site that should be added to and assessed as part of both the employment and housing site allocations evaluation. The site meets the assessment criteria for an appropriate mixed use scheme and the addition of the proposed site will help the Council improve its employment and housing supply positions. The provision of additional mixed use employment facilities further enhances the sustainability of the area. 6.3 These representations have demonstrated that the proposed allocation of this land to the west of Coles Green Road is consistent with the general approach towards the location of sustainable development included within the NPPF. The existing employment use creates both an unsustainable and unproductive form of employment use and evidence can be provided to the Council to show its continuing use as such is not viable and would result in an unsustainable pattern of development.

6.4 Due to viability constraints, employment in the form designated in the Draft Development Management Policies is unlikely to be delivered at this site, is likely to be delayed and ultimately would create conflict with existing surrounding occupiers. In light of all of the above, and when applying the tests of policy, outlined in the NPPF, we conclude that the Draft Development Management Policy is both unjustified, ineffective and inconsistent with national planning policy. This site should therefore not be identified solely for employment development and the proposed quantum of housing for Brent should be directed to Coles Green Road.

6.5 The site is well located to the adjacent large residential settlement of Dollis Hill and is in a sustainable location to provide housing development to meet the future housing needs of Brent, whilst also providing green infrastructure contributing to recreational opportunities and the biodiversity of the area. The promotion



site is available, suitable and deliverable within the short to medium term, would contribute to the LPA's housing land supply, and provide suitable, alternative and skilled employment opportunities in excess of what is currently on site. The site has been assessed against the criteria contained within the Draft Development Management Policies and it has concluded that there is sufficient evidence to support the proposal for revised policies which take account of the positive criteria and deliverability of this site.

#### Council Response

The DMP contains detailed criteria to be applied in determining the release of employment land, which are to be considered in conjunction with the recommendations of the Employment Land Demand Study.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
	Site Specific		DLP Planning Consultants	on behalf of NTC
<b>Comments</b>				
<p>Key Reasons for promoting a mixed use scheme at Coles Green Road, Brent</p> <p>6.1 The proposed development would bring the following benefits to the London Borough of Brent:</p> <ul style="list-style-type: none"> <li>· It is a development site that is available, achievable and deliverable within a short timeframe;</li> <li>· No existing employment operations will be lost and the proposed scheme will offer an increase in the number of jobs created over the existing underutilised employment use.</li> <li>· It has been assessed as a suitable housing site which can be sensitively designed around a number of employment uses;</li> <li>· It will provide for around 66 homes, with provision for affordable housing;</li> </ul> <p>A notable contribution towards the five-year housing supply required in the London Borough of Brent;</p> <ul style="list-style-type: none"> <li>· The creation of a significant level of new green infrastructure and biodiversity enhancements.</li> <li>· The proposal would support existing local leisure facilities, shops, employment and areas for recreational land; indeed it will supplement community facilities;</li> <li>· Technical studies have been initially scoped to include, transportation, daylight and sunlight, flooding and drainage and have concluded that there are no constraints affecting the ability to deliver development at the site.</li> </ul> <p>Conclusions</p> <p>6.2 These representations have been prepared by DLP Planning Consultants on behalf of NTC to demonstrate this site can offer a sustainable alternative employment provision without impacting the delivery of other employment uses sought by the Council and that this is an appropriate potential mixed employment and housing site that should be added to and assessed as part of both the employment and housing site allocations evaluation. The site meets the assessment criteria for an appropriate mixed use scheme and the addition of the proposed site will help the Council improve its employment and housing supply positions. The provision of additional mixed use employment facilities further enhances the sustainability of the area.</p>				
<b>Council Response</b>				
<p>The DMP contains detailed criteria to be applied in determining the release of employment land, which are to be considered in conjunction with the recommendations of the Employment Land Demand Study.</p>				

## Policies Map

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Policies Map	Policies Map	N/A	N/A	Wembley National Stadium Limited
<b>Comments</b>				
<p>We note the proposed extension of the Wembley Town Centre to include the area around Wembley Park station. We welcome developments which promote the</p>				

vitality and vibrancy of the area around the stadium- but emphasise that any applications for development in this area should be required, as a matter of policy, to address key issues arising on event days- particularly transport and crowd dynamics. Please can you review DMP1 and DMP2 in this context. Growth within and around existing residential locations will allow new development to take advantage of existing service infrastructure, community facilities and benefit development delivery in the most environmentally sustainable way. As part of the Golden Thread running through plan making and emphasised within the NPPF, sustainable development relies on high quality design in the most appropriate locations. Paragraph 7 of the NPPF focuses on the role of well-connected development "...and by creating a high quality built environment, with accessible local services that reflect the community's needs..." The NPPF promotes growth adjacent to existing well connected centres.

4.6 Given the market viability of the exiting employment use, due to the length of time of marketing and lack of interest it is apparent that the current development restrictions are negatively affecting the future delivery of development. Premises strictly within only B Class uses do not represent an attractive market opportunity or one for which tenants are seeking land opportunities. The Core Strategy and Draft Development Management Policies seek to protect SIL's, whereas the NPPF requires employment sites that have no reasonable prospect of being used for the designated employment land purpose, to be permitted for alternative uses relative to the need to support sustainable local communities. Planning policy restrictions on the development of the site and limitations in creating high quality alternative employment uses are such that an alternative approach must be adopted to identify and encourage the next most appropriate and feasible use on the site. Identifying a more appropriate use will help to meet the need for employment floorspace within alternative use classes and housing capacity for the London Borough of Brent.

Effective

4.7 Delivery is a fundamental element of planning policy. Policies and allocated sites need to be delivered during the period of the plan. There are no significant constraints and delivery problems associated with a proposal for a mixed use commercial and residential scheme. It is therefore effective to allocate land at Coles Green Road for a mixed use development whereas to restrict it solely to employment uses would be ineffective.

#### Council Response

The amended boundary is reflective of that already adopted in the Wembley Area Action Plan (AAP). Policies specific to Wembley are contained within the AAP and would be applied alongside the DMP.

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Policies Map	Policies Map		Neil Impiazzi	SEGRO
<b>Comments</b>				
SEGRO supports the proposed alteration to the policies map which shows release of land within Northfields Industrial Estate from Strategic Industrial Location designation, as referred to at paragraph 8.3 of the draft DMP.				
<b>Council Response</b>				
Support noted.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Policies Map	Policies Map		N/A	CGMS Consulting on behalf of Costco
<b>Comments</b>				
We believe the proposals map modifications seek to highlight the release of parts of the SIL for Wembley that are proposed as part of the Area Action Plan. It is considered that further clarification is required to establish where the changes to the alteration are sourced and subsequently the scope for comments on the changes. We also consider that the plan could be improved graphically, as it is considered difficult to understand in terms of the colours/shading used for the SIL.				
<b>Council Response</b>				
The Wembley Area Action Plan has been adopted therefore the policies map has been updated accordingly. Greater clarity will be provided on proposed				

amendments to SIL and LSIS.

## Proposed Alterations to Core Strategy

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Proposed Alterations to Core Strategy	Proposed Alterations to Core Strategy		Anne Clements	Quintain
<b>Comments</b>				
<p>A general reference is made to replacing references to planning obligations with references to CIL, where appropriate and these amendments are welcomed. However, it is only at paragraph 5.101 that a detailed explanation of the application of CIL is set out and at that point, only in relation to community and cultural facilities. A comprehensive explanation of the application of CIL charges compared with other developer contributions where sought, is required towards the front of the document for clarity. In addition, paragraph 5.101 should be amended so that the following words are included at the end of the third sentence after "...new community facilities, amongst other essential infrastructure."</p> <p>In relation to CP23 the word "sports" should be removed so that any lost community or cultural facilities can be replaced as required.</p>				
<b>Council Response</b>				
The proposed alterations will not be taken forward. A full review of the Core Strategy will commence following adoption of the DMP.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Proposed Alterations to Core Strategy	Proposed Alterations to Core Strategy		Anne Clements	Quintain
<b>Comments</b>				
<p>A general reference is made to replacing references to planning obligations with references to CIL, where appropriate and these amendments are welcomed. However, it is only at paragraph 5.101 that a detailed explanation of the application of CIL is set out and at that point, only in relation to community and cultural facilities. A comprehensive explanation of the application of CIL charges compared with other developer contributions where sought, is required towards the front of the document for clarity. In addition, paragraph 5.101 should be amended so that the following words are included at the end of the third sentence after "...new community facilities, amongst other essential infrastructure."</p> <p>In relation to CP23 the word "sports" should be removed so that any lost community or cultural facilities can be replaced as required.</p>				
<b>Council Response</b>				
The proposed alterations will not be taken forward. A full review of the Core Strategy will commence following adoption of the DMP.				

Chapter	Section	Policy/Para No.	Full Name	Organisation Details
Proposed Alterations to Core Strategy			Dr Michael GP Maguire MRTPI	
<b>Comments</b>				
<p>1. Planning for More and Better Housing Paragraphs 5.84 &amp; 5.85</p> <p>1.1 The reference to the Core Strategy paragraph "The proposed revision of the London Plan .....London Strategic Land Availability Assessment" is incorrectly cited as paragraph "5.85", as it is labelled '5.84' in the Adopted Core Strategy (page 79).</p>				

- 1.2 The reference to the Core Strategy paragraph "Circular 1/2006 .....PPS 3" and the proposed replacement sentence should be annotated as paragraph '5.85'.
- 1.3 The proposed deletion of the 'commitment' in the Core Strategy, paragraph 5.84, to specifically provide for the very specialised housing needs of Travellers and Gypsies in the Development Management Policies DPD is effectively a retrospective attempt to justify the omission of such a policy in the current proposed Development Management Policies Plan.
- Strategic Objective 7
- 1.4 Wheelchair Adaptable and Lifetime Homes monitoring. Why the differentiation between monitoring the former on the basis of "completed homes", but the latter on the basis of "approved" homes ?.
- Strategic Objective 10
- 1.5 Code for Sustainable Homes and BREEAM levels. "Major residential developments" should be defined in numerical terms, preferably 'over 100 homes '.

#### **Council Response**

The proposed alterations will not be taken forward. A full review of the Core Strategy will commence following adoption of the DMP.

## Consultation form responses

Name	No Name
General comments	Yes, I think it's great that Brent Council are finally doing something about too many betting/ takeaway/ payday loan shops and pawnbrokers. Brent residences (especially the younger generations) are not coming from stable homes as they once did or even at same standards as the wealthy boroughs, so why even allow all theses shops to open in the our borough in the first place?- (probably to generate income) I'm glad we are bothered now (better late than never). What's the purpose for betting shops?, the residence who desperately require entertainment and can only find it in gambling should venture out to central London, why have it at our doorstep to corrupt the unfortunate- really scares me what sort of people are elected to run our boroughs! I hope the new members of the elected Council will care enough t make sensible decisions.
Council Response	
Noted. The Council has had limited powers to control the increase in betting shops, pay day loan shops and pawnbrokers. The Gambling Act 2005, removed the 'demand test' making it no longer necessary for developers to prove there is demand for further betting shops in an area. In terms of planning powers, betting shops, pawnbrokers and pay day loan shops fall within the A2 use class. This means these businesses can open in units previously used by financial and professional services (A2), restaurants and cafés (A3), drinking establishments (A4) and hot food takeaways (A5) without planning permission being required. Only changes from retail shops (A1) would currently require planning permission. In September 2014 the Government consulted on proposals to create a smaller planning use class containing betting shops and pay day loan shops, meaning planning permission will be required for a change from any other use. This has allowed the Council to take forward a policy which will better control the spread of these uses.	

Name	No name
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	It's not robust enough to protect assets of community value without repeated challenges from developers.
Comments - quality, size and type of housing	For a start you can use what happened at Willesden Library (where there was no affordable housing or shared ownership for keyworkers) not happen again. It was a disgrace that they were advertising in China that the benefits of this were that there was no affordable housing in the complex! Large Housing developments should also have a clause that they any parking must be contained on the site and not taking up more space on the side streets. Furthermore, cycle storage etc should be built in.
Policies on sustainable development	Greater emphasis on Carbon Reduction. Greater emphasis on use of renewable energies built into the buildings. This should be done as standard.
Council Response	
The Council's Core Strategy sets a target for schemes of 10 or more homes to provide 50% affordable housing. To be consistent with the National Planning Policy Framework (NPPF) this is subject to viability, and all schemes of this scale are accompanied by a viability assessment to provide evidence of the level of affordable housing which can be achieved. This assessment is scrutinised by the Council. The Council cannot use planning powers to prevent developers advertising properties for sale outside of the UK; however, the Mayor has a voluntary code, which all developers are encouraged to sign, committing to market homes to Londoners before, or at the same time as buyers from other countries.	

In line with proposed policy car parking provision would be on site. It is proposed in areas of on-street parking stress where there are Controlled Parking Zones, the Council will limit the number of on-street parking permits available for occupiers of the development other than for disabled blue badge holders. Opportunities for development to be car free will be considered in area with good public transport access. Developments will be required to provide cycle parking in line with the standards outlined in the DMP, and major development will be expected to contribute to improving links to and on the London Cycle Network. London Plan policy addresses reducing carbon emissions through the use of decentralised energy.

Name	Patricia
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Listen to residents concerns more
Comments - quality, size and type of housing	Make sure they include new medical centres
Council Response	
The Core Strategy includes requirements for health care provision informed by the Infrastructure and Investment Framework. Population growth and the associated requirement for health care provision will continue to be monitored and reviewed as required.	

Name	Maureen O'Keeffe
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Open Spaces could be kept a bit cleaner and more attractive and free from drinkers and drug users. Historic buildings could be kept looking cleaner so that they can be appreciated.
Council Response	
This is outside the scope of the DMP, however, comments will be passed on to the relevant Council departments.	

Name	Dabinder Rai
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Stop building houses and flats on the little space that is left in Brent.
Comments - quality, size and type of housing	There is not enough housing in Central Brent. Any new houses should be build towards the outskirts of Brent.
General comments	Too much funding is being spent in the North of the borough. More money needs to be invested in building up the town centres of those in the south of Brent.
Council Response	
The Core Strategy sets housing targets to meet identified need. The Site Allocations Development Plan Document (DPD) identifies and allocates sufficient sites to meet this target. The Site Allocations DPD is informed by an assessment of the availability of suitable sites. It allocates sites across the borough including	



sites in Central Brent. For example within Wembley sites are identified to accommodate 11,500 homes to 2026. There are not sufficient suitable sites on the outskirts of Brent to meet the housing target in full. Any proposals for housing development coming forward for housing outside of the site allocations will be assessed against the policies in the DMP.

The Council's Regeneration Team includes Regeneration Growth Area Managers and a Town Centre Manager responsible for securing funding for Brent's growth areas and town centres, which are distributed across the borough.

Name	Farrukh Jamil
General comments	For once Brent Council can pull its figure from its backside and take some radical action to clean the Borough by limiting the number of all businesses in all areas. The Borough has become a fish market with no dignity, respect and integrity for any business. Borough needs to take some radical actions to over power this now and not in 2/3 years time, when the problem may overflow.
Council Response	
The council has drafted proposals to keep high streets as mixed as possible in order for one type of business not to dominate, see DMP 2 and DMP 3.	

Name	khan
General comments	i agree the polices against the bet shop pawn brokers
Council Response	
Noted.	

Name	Mary Cuniffemary
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	No plan will work unless the council controlled the following - these problems are especially prevalent on Wembley High St and Ealing Road. Pawnbrokers , Betting Shops and Pay Day Loan Shops are far too plentiful and there is insufficient regulation on how these companies rip off the poor. There is no regulation on the number of shops that look worse than Pound Shops - many of these spill out on to, the pavement and selling Veg and Fruit in bowls , and toilet rolls in abundance. Veggie shops that do not clean up their shops enough - lack of hygiene. Sweat shops - and Bazzaars - at least three of them on Ealing Road that have crammed in small units either selling products, cutting hair, sewing, mobile phones - 90% of these units have no window or proper ventilation and are worse than Victorian conditions that have been historically condemned. Traffic congestion caused by an illegal supermarket - VB & Sons premises was never designed to be a super market- original planning permission was for a number of shops with front opening on to Ealing Road. There is now a permanent Shipping Container in the car park which already does not cater for the number of customers. This a bit cleaner than before. It the whole enterprise clogs up the residential area and could not have been passed under normal planning conditions for Vendors. This needs to be looked in to as the level of corruption surrounding it is obvious. Too many new high rise developments in the area. This has trebled the population and will put an unnecessary strain on an area that was not coping before. The 1960s experience of high rise should teach us that we will have social problems if we c tinge to cram the poor into inadequate spaces. Flytipping and rubbish dumping has increased exponentially in the last two years and is not being tackled.

Comments - quality, size and type of housing	Deal with the problems we have
Policies on sustainable development	I have not read the policies because I think generally the issues of local residents who are already here have been ignored for over a decade to, the detriment of what was a quiet peaceful area to live in. Alpertion is now blighted by dirt, rubbish and environmental problems that are cause by cramming the population into the area, not regulating new businesses that look like they are exploiting workers in poor conditions, The UK used to have much higher standards and we are not helping anyone by catering to the lowest cannot denominator. People have moved here to improve their lives, and we should resist copying the standards of where migrants have originated from. You don't have to travel any more to see small shops and crowded spaces where workers are working in sub standard conditions and residences are putting up with an inordinate amount of rubbish.
General comments	It is time also to challenge why residents are paying to park with I the Zone- when it was introduced first we were promised that it old be free. The council is not befitting from these charges as the zone is run by a private contractor.
Council Response	
DMP 3 proposes to limit the proportion of pawnbrokers, pay day loan shops and betting shops in Brent's town centres. The Council does not have powers to regulate these uses, however, the government recently consulted on proposals to increase regulation of betting shops. Proposed policy DMP 2 sets criteria on the design of shop frontage and restrictions on forecourt trading, to ensure it does not cause obstructions to pedestrians. Comments regarding VB& Sons have been passed to the Enforcement Team for investigation. Tall buildings is addressed in London Plan Policy 7.7 including the scale of buildings should consider existing character and context and be of an appropriate and complementary scale, massing and height in relation to its immediate and strategic context. Other comments are outside the scope of the DMP, however, where relevant comments will be passed on to the appropriate Council departments.	

Name	S Morpurgo
Comments - quality, size and type of housing	Many new builds using cement fascia material - start to show weathering damage cracking and water ingress even within 4 years. Flat roofed developments in Brent have required re surfacing and repairs within 4 years. The Fire brigade recommendations have not been listened to - New builds with very weak partition stud walls EG: Using wooden frames between 14 flats - Woodcock Hill HA3. This type of new build does not stop fire from moving rapidly through a whole development. Yet they are still being approved and built in Brent. Poor quality, not designed for winter conditions.
Policies on sustainable development	
Council Response	
It would not be appropriate for the DMP to prescribe materials, however, proposed policy DMP 8 includes the requirement for buildings to be constructed of materials which are sustainable and high quality. In accordance with this policy and with consideration of the local context the case officer will make an assessment on the suitability of materials proposed. National standards to ensure buildings are safe and accessible are set out in Building Regulations. All buildings must meet the requirements of the Building Regulations.	

Name	Joseph Goldstein-Yusuf
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	
Comments - quality, size and type of housing	All London council should be prepared for phenomenal population boost from 2014 till 2020, as most of the new settlers from overseas have never had it so good according to 21st century Macmillan's quote. Most population explosion in London and Birmingham etc is due to deep traditional culture philosophy about life; life is all about multiplying at fastest rate when food facilities are abundant, plenty and cheap. As stated in Brent council vision of the future DMP 40, housing facility factors d, e, g are none existent, as landlords cash in on new settlers/immigrants.
General comments	All London council should be prepared for phenomenal population boost from 2014 till 2020, as most of the new settlers from overseas have never had it so good according to 21st century Macmillan's quote. Most population explosion in London and Birmingham etc is due to deep traditional culture philosophy about life; life is all about multiplying at fastest rate when food facilities are abundant, plenty and cheap. As stated in Brent council vision of the future DMP 40, housing facility factors d, e, g are none existent, as landlords cash in on new settlers/immigrants.
Council Response	
The design of housing and standards it has to achieve is covered in the London Plan and associated Housing SPG	

Name	M. Von Stoll
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	We need to keep our open spaces, we have lost many trees and green spaces with the dense building of flats in Kilburn, marketed abroad in Singapore, conditions must be made by the legal department when council land is sold off. This has not helped the housing problem in Brent it has made it worse. When considering any new buildings, planners must also consider the infrastructure to sustain the larger population, schools, parking, GP's, Hospitals, open space community facilities, crime historic buildings and the development should enhance The local community.
Comments - quality, size and type of housing	Council land and buildings should not be given over to Housing Associations or sold to private developers. Tenants of housing associations to not have the right in law to manage their own property or be part of the association board and the rents are in many cases too high for those on low wages.
General comments	I would like Brent, Camden and Westminster councils to work together on proposed developments in Kilburn together with the local community. Each of these boroughs are building large developments increasing the population with the loss of open spaces, trees, no new community facilities or infrastructure to support. The present population is being squeezed or worst made to move out of the borough,
Council Response	
The Core Strategy includes requirements for social infrastructure provision informed by the Infrastructure and Investment Framework. Population growth and the associated requirement for social infrastructure will continue to be monitored and reviewed as required. This is outside the scope of the DMP consultation, as the Council cannot use planning powers to prevent developers advertising properties for sale outside of the	

UK. Comments will be passed to the relevant Council department.  
Brent, Camden and Westminster councils liaise and formerly consult each other on development proposals within the Kilburn area. There is interest in a prospective Neighbourhood Plan for Kilburn and this may be one mechanism to deliver further joint working.

Name	S MAIde
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Having by laws that limit the amount legally allowed for betting, pawn etc in any high street.
Comments - quality, size and type of housing	not sure
Policies on sustainable development	pawn, betting shops etc are not long term goals
General comments	no
Council Response	
Noted. Adult gaming centres, pawn-brokers, pay day loans and betting shops are addressed in policy DMP3.	

Name	Jen
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Why wasn't the Willesden library saved when so many people opposed it? Would the council listen to our views anyway? Why build so many more flats where the infrastructure e.g. schools cannot support them?
Policies on sustainable development	Too many flats means much more rubbish - more services to support increased houses
General comments	Help make our high street be cleaner, fill in the pot holes.
Council Response	
Core Strategy Policy CP23 protects existing community facilities - allows for their loss if replaced on site or nearby.	

Name	Maggie Chambers
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	I think everyone knows what activities promote antisocial behaviour. You don't need the public to spell it out. The four money making establishments listed above are all problematic in one way or another - takeaways are expensive and unhealthy and promote litter, betting shops squander family money, pawnbrokers take people's possessions for ludicrously low amounts and put people in further debt, as do payday loan shops which have horrendous rates of interest. Protect the public by minimising them.
Comments - quality, size and type of housing	Don't know enough about the problem or solutions but I suspect anyone with access to all the information would have the solution staring them in the face.
Policies on sustainable development	Don't know
Council Response	

The Council proposes to introduce policy to limit the proportion of takeaways, betting shops, pawnbrokers, pay day loan shops, as set out in draft policy DMP 3.

Name	a
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	By encouraging proper local business start-ups to use and employ local youth. By not allowing betting shops, fast food outlets and so called "shisha" outlets on the street.
Policies on sustainable development	Countless apartment developments will not encourage sustainability and will increase demand for services.
Council Response	
<p>The Council works with developers in the borough to ensure local people benefit from job creation and skills training from new developments. As this is a strategic priority policy on local employment and training schemes is included in the Core Strategy.</p> <p>The Council proposes to introduce policy to better control the development of takeaways, betting shops, and shisha cafes, as set out in draft policy DMP 3. The Core Strategy includes requirements for social infrastructure informed by the Infrastructure and Investment Framework. Population growth and the associated requirement for social infrastructure will continue to be monitored and reviewed as required.</p> <p>The London Plan contains policies to deal with Housing Standards and the Housing SPG. It also includes policies on Design.</p>	

Name	Darshan
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Create more offices for the highly unemployed people to learn or improve their job search or career skills. engage people to participate in community events to get networked for employment
Comments - quality, size and type of housing	Reduce the number of people given free council housing. Increase employment, reduce immigration. tighten policies on benefits
Council Response	
<p>The Council works with developers in the borough to ensure local people benefit from job creation and skills training from new developments. As this is a strategic priority policy on local employment and training schemes is included in the Core Strategy.</p> <p>This is outside of the scope of the DMP.</p>	

Name	Frank Hemmes
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Employment: The proposed policies seem rather defensive and primarily aimed at reducing the rate of loss of employment sites. This creates the risk that if many currently vacant spaces meet the criteria for being changed to non-employment sites, the total size of employment sites will still decline. Is it possible to have more proactive policies that encourage creative/innovate use of employment space prior to reallocating it for non-employment use?
Council Response	
The Council is required to protect sufficient land to meet business need in line with the NPPF. Furthermore, Local Employment Sites (LES) make an important	

contribution to the local economy, therefore policy does seek to protect LES where they can continue to meet the needs of businesses. In line with DMP 14 the development of these sites for non-employment uses would only be allowed where it can be demonstrated there is no current or future demand for the site for ongoing employment use and the possibility of redeveloping the site for alternative employment uses has been fully explored. DMP 14 also allows the redevelopment of vacant LES for mixed-use development where this would support provision of affordable workspace. Policy on designated employment sites (Strategic Industrial Location and Locally Significant Industrial Sites) is contained in the Core Strategy.

Name	k.Michaelides
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	There should be more stringent limits on the numbers of take aways, betting shops, shishas and same day loans outlets. No more than one of each per street to reduce gambling, smoking and encourage a more diverse range of shops. We have insufficient open spaces and conservation areas. Increased housing and population densities mean people need to find peace and relaxation in a green and natural environment. These are vital to public health. These need to be extended and part of each development. Places of historical interest must be preserved. This is important for our heritage and public and national pride. They also encourage footfall and revenue.
Comments - quality, size and type of housing	Although housing is urgently needed, it is too crowded and causes friction and stress to the occupants. Sound proofing is also important. High rises are anti-social and it is proved that they cause isolation and depression. Housing with insufficient parking within the development has already caused grid locking in our streets, blind spots, illegal parking and dirty streets that cannot be swept and washed.
Policies on sustainable development	There are no provisions for adequate schools, doctors, hospital and social and mental health provision. Too many flats with a burgeoning population and children with nowhere to go for education. Patients cannot be seen quickly as there are not enough medical facilities and staff. Every development must have these infrastructures included.
Council Response	
<p>The Council proposes to promote a diverse mix of uses in our town centres, by setting a limit on the proportion of takeaways, betting shops and pay day loan shops, as set out in draft policy DMP 3.</p> <p>London Plan Policy 7.18 seeks to protect open spaces, whilst the Core Strategy includes a requirement for new open space within growth area. In addition policy DMP 19 includes standards for amenity space provision, which will apply to all new residential units.</p> <p>The DMP includes policies to protect residential amenity (DMP 1 and DMP 17 in relation to noise) and ensure sufficient parking is provided (DMP 12).</p> <p>The Core Strategy includes requirements for social infrastructure informed by the Infrastructure and Investment Framework. Population growth and the associated requirement for social infrastructure will continue to be monitored and reviewed as required.</p>	

Name	Phil Leask
Policies on sustainable development	There needs to be a specific DMP policy, possibly 21b, relating to local flooding and run-off from residential properties. A combination of deliberate use of planning policy and enforcement where necessary, would ensure, over time that frontages with driveways or paved areas become sustainable, through the required use of SUDS and genuinely permeable surfaces and increased soft landscaping. This would greatly reduce run-off in areas where currently large amounts of water pour out on to the streets when it rains. In the context of climate change and the likelihood of wetter winters, drier summers but also an increase in sudden downpours, this is particularly important. Since there are two aspects to this - development where consent is applied for, and development



	involving a breach of planning requirements - the policy needs to have its own Performance Measure. This would require the monitoring of planning consents. It would also require monitoring of enforcement action. The latter is necessary, as this is an area of policy currently given a low priority by planning enforcement, reflecting a lack of wider understanding of how the GPDO and associated policies could transform conditions over time.
Council Response	
This is addressed in Policy DMP12 which seeks soft landscaping provision and London Plan Policy 5.12 Flood Risk Management	

Name	Arabella Parmar
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	The planning policy document is a complex document. Who has the time to read and understand what is written in it? The council should have a scheme in place to provide protection for the above and not call upon the general public to improve strategies. The council needs to employ professionals who can judge the needs of residents and businesses in Brent and make policy amendments around that.
Comments - quality, size and type of housing	Again: the planning policy document is a complex document. Who has the time to read and understand what is written in it? The council should have a scheme in place to provide protection for the above and not call upon the general public to improve strategies. The council needs to employ professionals who can judge the needs of residents and businesses in Brent and make policy amendments around that.
Policies on sustainable development	Again: the planning policy document is a complex document. Who has the time to read and understand what is written in it? The council should have a scheme in place to provide protection for the above and not call upon the general public to improve strategies. The council needs to employ professionals who can judge the needs of residents and businesses in Brent and make policy amendments around that.
General comments	The town centres should be pretty and attractive to visit. Not filled with Betting Shops, Pawn Brokers, Takeaways and Lawn-sharks. The council need to police the way shop fronts are presented. They should be stylish, not cheap with plastic lettering and neon signs. (look at any old English town centre outside London) A license should not be renewed if they have not improved their shop front. Every little bit of detail helps make a town centre look nice. Traffic can be improved by making adjustments to traffic light timings. Many traffic lights are wrongly adjusted, causing many motorist misery at peak and off peak times.

Council Response	
<p>The DMP is a planning document forming part of the Local Plan. To be consistent with the NPPF and London Plan and to serve its purpose it is necessary it uses certain terminology. Efforts have been made to keep the DMP concise and further reduction has been proposed. As such it is considerably shorter than the UDP it will supersede which is nearly 300 pages long. The Council undertakes consultation to give interested parties the opportunity to have their day on the proposed policies. This is a requirement of the Town and Country Planning Regulations (Local Planning) 2012 and also consistent with the Council's Statement of Community Involvement.</p> <p>The Council proposes to promote a diverse mix of uses in our town centres, by setting a limit on the proportion of takeaways, betting shops and pay day loan shops, as set out in draft policy DMP 3.</p> <p>DMP 2 provides criteria to promote attractive town centres and shopfronts.</p>	

Name	John Poole
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General comments	Housing with quality open spaces and air are vital for good health in the community and we need to always think about how we can improve these conditions for better health and improved employment opportunities.
Council Response	
Noted. London Plan Policy 7.18 seeks to protect open spaces, whilst the Core Strategy includes a requirement for new open space within growth area. In addition policy DMP 19 includes standards for amenity space provision, which will apply to all new residential units.	

Name	Bharat Shah
General comments	As with question 1, there are also far too many food shops , butchers on high streets, i.e. all of them offering the same sort of food off licence and provisions items. These need to be scaled down as well. On top of these shops extend they products to the front of the shop onto pavements. One it spoils the outlook of the high street and is also dangerous for the pedestrians, there is no walking space. Just look at the shops between 415-457 Kingsbury Road NW9. With regards to housing, there are far too many family homes which are basic 3 bedroom homes now rented out and occupied by as many as 10 people. One just need to look at waste bins. A number of properties have been converted into flats with the small front bedroom as a kitchen. This again spoils the outlook and appearance of the area. It basically lower the values of the area. Are these properties legally converted into flats. Fly tipping at the end of the roads, or in the alleys, people leaving their normal rubbish, piece of unwanted furniture etc. We all know that the country has had new wave of people of different part of the world come to UK , A suggestion that a member of council attends school assemblies at once every 3 months and talks about disposing all types of rubbish to the children and who can then pass these information to their parents and when these children grows up they would know exactly how to dispose off the rubbish and not to dump anywhere and make the area look clean. Take Singapore for example, They have strict guidelines for disposing rubbish. Chewing gum is just one example. We are good at putting laws in place but not good at implementing, the laws are all self governing thinking that we all will abide by it.
Council Response	
In developing the policy a review of town centre health check was undertaken. Although there is evidence that there has been a rapid increase in the number of takeaways, betting shops and pay day loan shops, the same can not be said for food shops. Many centres have seen a decrease in A1 uses including food shops. Therefore there is not evidence these uses are overly dominating town centre to their detriment. Proposed policy DMP 2 deals with forecourt trading. Proposed policy DMP 1 & 17 provides criteria on conversions, to ensure this is not to the detriment of the wider area. If residents have concerns that a property has been converted in a way which would breach planning regulations this should be reported to the Council's Enforcement Team who will investigate. Fly tipping is outside of the scope of the DMP consultation, however, comment swill be passed on to the relevant Council department.	

Name	Simon woo key
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and	Brent needs to plan for future employment in the developing TMT (tech, media and telco) sector. This is a sector where businesses can grow from a handful of people to dozens of employees almost overnight. This is a sector that is price sensitive and what drove them to silicon roundabout (cheap rent) will drive them towards Kilburn,

conservation areas.	queen's park and Kensal when rents increase in the centre. This is noted in the 2012 London office policy 1.8.17 Queen's Park location of the south Kilburn regeneration project offers the opportunity to create a local TMT hub as it is situated close to the larger TMT hubs of Paddington and Euston/Kings Cross and the future development area of Oak Park. The many locals who work in the creative industries would benefit from this economic redevelopment
Comments - quality, size and type of housing	Freeholders who wish to improve their homes by reasonable and high quality (design, material and construction) additions should be encouraged within regeneration areas. This will help add to a diverse housing mix and provide the filling in of the fine grain detail of the area to compliment the new housing being built.
Council Response	
<p>The DMP policies do not prescribe what forms of employment uses are suitable in Local Employment Sites. This is to allow flexibility as growth sectors emerge. However, the policies would support the development of tech, media and telco within Local Employment Sites and secondary frontage of town centres. Proposed policy DMP 14 to encourage the creation of affordable workspace as part of major commercial developments in SIL and LSIS could also support the development of this sector.</p> <p>London Plan Policy requires the use of sustainable and high quality materials, however, this only applies where a planning application is required. DMP1 relates to preserving the character of an area, and respects the grain and nature of the predominant street character.</p>	

Name	James Powney
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	I think it would be useful, if technically possible, to differentiate between those community buildings genuinely open to the community at large, and those open only to limited categories (e.g. private clubs). In some respects it may be that current policies are too protective of D1 uses.
Council Response	
Community assets are not viewed in such a way. General public access will be encouraged where possible, but for existing community uses the fact that it might be limited to one particular group will not mean that it cannot be considered as an asset that could be used for other groups in the future.	

Name	Katrina Heal
General comments	The 400m buffer zone for takeaways around schools is a good start to supporting healthier environments, but as children in London have good access to public transport this would have more impact if it were increased to 800m (Brighton and Hove council have done this). Aside from this being implemented around secondary schools, this could also be extended to public spaces - parks and primary schools in the borough.
Council Response	
The policy is considered appropriate for Brent's characteristics. 800 metres is a significant area given the number of schools which has to be balanced up against the practical reality that many schools are located near to town centres/shopping parades which are also subject to downturns in demand from A1 retailers.	

Name	Will
Comments on policies on protection of employment sites, community facilities,	Our Pubs, The Queensbury in particular, should have a proper protection policy.

open space, historic buildings and conservation areas.	
Comments - quality, size and type of housing	
Policies on sustainable development	I think waste collection and street cleaning in Willesden is a long way short of what is needed for the Area to appear clean. There are far more adults living in properties that traditionally used to house less people, thus producing far more waste than Brent Council seems to anticipate. Any future developments of housing or business should be have more than the minimum provision for Waste management.
Council Response	
Noted. A separate pub protection policy has been added to the DMP in response to feedback. Provision for the storage of waste and recycling must be designed into new developments with appropriate accessibility from units and the street, the storage capacity and arrangement must also be in line with the council's current requirements see Waste and Recycling Storage and Collection Guidance for Residential Properties.	

Name	L.sunderland
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Stop selling off sites for redevelopment (e.g. libraries/community centre, council offices @Willessden & forty lane etc.) Need specific pub protection policy like some other boroughs.
Council Response	
Where there is a loss of infrastructure, outlined by London Plan Policy 3.16, the council intends to replace the facility or where there is no demand for the facility no more, it will be redeveloped.	

Name	c grech
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Do not sell or allowed to be sold to developers.
Comments - quality, size and type of housing	Not allow new build to be sold offshore
Council Response	
The Council cannot use planning powers to prevent developers advertising properties for sale outside of the UK, however, the Mayor has a voluntary code, which all developers are encouraged to sign, committing to market homes to Londoners before, or at the same time as buyers from other countries.	

Name	Hannah ford
Comments on policies on protection of employment sites, community facilities,	Shopfronts and signage that are currently used are ugly, too diverse in their appearance, cluttered and cover up the older more beautiful buildings behind them - the plans only cover new applications but don't look to address

open space, historic buildings and conservation areas.	the current problems Also there are too many shops with the same limited use - hair products, Somali markets, internet/phone shops, chicken shops as well as the betting/ pound shops/ loan shops - there's not enough diversity in provision of quality goods and cafés. We need to encourage more well known brands to the area, non-ethnically specific cafés that are welcoming to all and quality boutique to the area to show of diversity and make the locals proud to have a nice place to live in .
General comments	Pavement space is used too liberally - the shops spill out on to the street all selling the same low quality cheap goods and clutter the pavement - there should be tighter controls on creating a nice environment especially as we now have nicer wider pavements - in no time they will be trashed if nothing is done.
Council Response	
The DMP policies can only be applied where a planning application is submitted. The Council will explore other mechanisms to improve the appearance of town centres including the public realm and existing retail units.	

Name	Lorraine Norton
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	I cannot download all your documents at the moment so unable to comment directly. However I still wish to make my views known. There is a marked difference between the care of local streets and the look of high roads in many areas of Brent as compared to Westminster (where i used to live). I am speaking of litter, a "down-and-out" appearance, and a growing number of large, ugly, refuse bins. This does not reflect well on Brent Council which is a pity. In my opinion if people live in a pleasant area that feel better and take more pride. When they live in a dowdy and uncared for area they become disgruntled and do not care about maintaining their surroundings. I am not saying shisha cafe's and take-aways should not be allowed anyway but I think too many near schools and colleges encourages smoking and unhealthy eating (and litter from take-aways). There are many buildings (and above shops) with beautiful architecture. Many of these have been allowed to deteriorate. More greenery and pleasant spaces are required.
Policies on sustainable development	I cannot download all your documents at the moment so unable to comment directly. However I still wish to make my views known. There is a marked difference between the care of local streets and the look of high roads in many areas of Brent as compared to Westminster (where i used to live). I am speaking of litter, a "down-and-out" appearance, and a growing number of large, ugly, refuse bins. This does not reflect well on Brent Council which is a pity. In my opinion if people live in a pleasant area that feel better and take more pride. When they live in a dowdy and uncared for area they become disgruntled and do not care about maintaining their surroundings. I am not saying shisha cafe's and take-aways should not be allowed anyway but I think too many near schools and colleges encourages smoking and unhealthy eating (and litter from take-aways). There are many buildings (and above shops) with beautiful architecture. Many of these have been allowed to deteriorate. More greenery and pleasant spaces are required.
General comments	I cannot download all your documents at the moment so unable to comment directly. However I still wish to make my views known. There is a marked difference between the care of local streets and the look of high roads in many areas of Brent as compared to Westminster (where i used to live). I am speaking of litter, a "down-and-out" appearance, and a growing number of large, ugly, refuse bins. This does not reflect well on Brent Council which is a pity. In my opinion if people live in a pleasant area that feel better and take more pride. When they live in a

	dowdy and uncared for area they become disgruntled and do not care about maintaining their surroundings. I am not saying shisha cafe's and take-aways should not be allowed anyway but I think too many near schools and colleges encourages smoking and unhealthy eating (and litter from take-aways). There are many buildings (and above shops) with beautiful architecture. Many of these have been allowed to deteriorate. More greenery and pleasant spaces are required.
Council Response	
<p>Street cleansing is outside the scope of the DMP, however, comments will be passed on to the relevant Council department. Proposed policy London Plan Chapter 7 policies require a high quality of design and , materials for the street environment and all publicly accessible buildings. It also requires coordinated and well designed street furniture, and the avoidance of unnecessary clutter.</p> <p>Proposed policy DMP 3 proposes takeaways and shisha cafes should not be given permission in proximity to schools.</p> <p>Proposed policy London Plan 5.10 requires all development to contribute to urban greening and for enhancements to existing landscaping to be sought.</p>	

Name	Nicola Chance
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	While I would not like to see a increase of takeaways, betting shops, pawnbrokers and payday loan shops on my local high streets (Willesden, Cricklewood and Neasden) I do not see much positive action to preserve and protect the positive and unique in these policies, these are often historic buildings, conservation areas and open spaces and community. These contribute vitally to the vibrant success of a strong town centre community. I feel that Brent needs to be proactive and take action needs to ensure high streets are easy to access, park in and offer a variety of small local quality shops. There should not be a predominance of any one type of shop and rents should be not be prohibitive for businesses with differing profit margins, which would lead too many chain betting shops and loan shops. I also support the 'meanwhile uses' in the proposals but would like to see some provision of these fledgling businesses, often offering community benefits being supported beyond a meanwhile timescale as this variety and dedication to a town centre is a positive contribution.
Comments - quality, size and type of housing	Better parking and bin provision within developments Favour development plans that allow adequate living space.
Council Response	
<p>DMP 7 sets out the Council's proposed policy and protecting heritage assets in the borough, London Plan Policy 7.18 deals with open space and Policy 3.16 community facilities (called social infrastructure to be consistent with the London Plan).</p> <p>The Council is actively exploring other mechanisms to enhance town centres. Proposed policy DMP 2 seek to promote a diverse mix of uses in town centres to support their viability.</p> <p>The vast majority of premises in Brent's town centres are under private ownership, meaning the Council cannot control rents.</p> <p>Support for Meanwhile uses is noted.</p> <p>The DMP sets parking standards for developments. Provision for the storage of waste and recycling must be designed into new developments with appropriate accessibility from units and the street, the storage capacity and arrangement must also be in line with the council's current requirements see Waste and Recycling Storage and Collection Guidance for Residential Properties. All developments are required to meet the London Plan spacing standards.</p>	

Name	Rita Conneely
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Comments - quality, size and type of housing	Affordable should not also be onsite- but when onsite it should be properly integrated into the housing development. This means no structural or design segregation as most recently exemplified by 'poor doors'.
Council Response	
London Plan Housing Policy 3.5 and the Housing SPG deal with affordable housing on site and its design.	

Name	Frances Matthews
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Under Affordable Workspace - could the percentage increase from 10% as start ups and SME's offer great diversity and contribute to the economy of London yet are at risk by increased property prices.
Comments - quality, size and type of housing	"Brent's 2003 private sector stock condition survey estimated that the majority of HMO buildings are not suitable for human habitation "I think there could be greater emphasis placed on the facilities, size of rooms and quality of any existing or new HMO buildings to ensure the standards of residence the private section create or manage is higher.
Council Response	
The 10% has been removed to take account of the pressures on release of employment land from residential use and also to encourage existing poorer employment premises to be upgraded to better meet business needs. HMOs will be required to meet the housing standards and quality set out in policy DMP20 and DMP 1 deal with the impact of HMOs on existing residential areas.	

Name	G. Fitzgerald
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Listed building' status to older properties. Keep local housing in the style in which it was built e.g. stop paving
General comments	Good improvement to shop fronts at Cricklewood Broadway. Wembley looks excellent, hopefully standards will be maintained.
Council Response	
Heritage England is responsible for maintaining the National Heritage List for England and decide if building should be designated as listed buildings. Proposed policy DMP 1 sets out design principles for extensions and alterations to existing buildings, including that they must complement the existing character and context. SPD 5 Residential Extensions, SPD 17 Design and additional area based guides will give further details.	

Name	Marina Gomes
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	By making residents more aware of these proposals
Council Response	



A variety of mechanisms were used to promote the consultation as widely as possible. This consultation was advertised within the Brent magazine, a copy of which is sent out to every Brent household. Letters were sent to interested parties on the Local Plan Consultation list, emails to all schools and members of the Consultative Forums, a press notice was placed in Wembley Observer, a press release was issued, posters and comment forms were displayed in all libraries, an exhibition was located in the civic centre, drop-in-sessions were held at venues across the borough and the consultation was advertised on JCDecaux boards across the borough. In addition the consultation was publicised on the Council's website, Facebook and Twitter and Council Officers undertook a presentation on the consultation at each Area Forum.

Name	No name
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Conservation of open spaces most important for environment. Green areas needed to increase - with planned building at Park Royal, Stonebridge and Brent Cross, Neasden (North Circular will be more polluted
General comments	Insufficient promotion of this project. Should have drop-in sessions at all major supermarkets. Street advert not eye catching - too green. We are not all online so copies of draft plan at libraries not easily accessible - fewer libraries now!
Council Response	
<p>London Plan Policy 7.18 seeks to protect open spaces, whilst the Core Strategy includes a requirement for new open space and targets for tree planting within growth area. In addition policy DMP 19 includes standards for amenity space provision, which will apply to all new residential units. London Plan Policy 5.10 requires all development to contribute to urban greening and for enhancements to existing landscaping to be sought.</p> <p>A variety of mechanisms were used to promote the consultation as widely as possible. This consultation was advertised within the Brent magazine, a copy of which is sent out to every Brent household. Letters were sent to interested parties on the Local Plan Consultation list, emails to all schools and members of the Consultative Forums, a press notice was placed in Wembley Observer, a press release was issued, posters and comment forms were displayed in all libraries, an exhibition was located in the civic centre, drop-in-sessions were held at venues across the borough and the consultation was advertised on JCDecaux boards across the borough. In addition the consultation was publicised on the Council's website, Facebook and Twitter and Council Officers undertook a presentation on the consultation at each Area Forum.</p>	

Name	Helen Smyth
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	More rules regarding household rubbish. Maintain all open spaces and keep litter free. More fines for fly tipping.
Comments - quality, size and type of housing	Consultation with current residents
General comments	Improvement to shop fronts and high streets to be more safer; creating more community feeling.
Council Response	
<p>Fly tipping and maintenance of open space is outside the scope of the DMP.</p> <p>The Council is actively exploring other mechanisms to enhance town centres. Proposed policies DMP 2 seeks to promote a diverse mix of uses in town centres</p>	

to support their viability. Proposed policy DMP2 and the associated Shopfront Design Guide will improve design within town centres.

Name	Penny Bishop
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	I didn't attend either meeting but closing libraries does not help; especially families who do not have a computer or quiet space and disposing of building e.g. the house on the roundabout at Neasden. The condition of Oxgate Farm House is a disgrace.
Council Response	
These comments are outside the scope of the DMP, but will be passed on the relevant department.	

Name	No name
General comments	As with most proposed policies I have found the residents' thoughts and ideas are rarely taken into consideration - sadly.
Council Response	
The purpose of the consultation is to give residents and opportunity to have their say on the proposed policies. All comments will be considered and policies amended as necessary. Comments and amended policies will be reported back to Committee.	

Name	H M Hacker
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Listen to what local people have to say. Make consultation genuine. Don't go through 'consultation' process and then do what is in the officer's report. The officers don't live or care about Brent. Listen to local people.
Comments - quality, size and type of housing	Developers should provide a good proportion of new housing for people working in the public sector - hospitals, schools, etc. This would be affordable one or two bedroom flats through housing associations.
Policies on sustainable development	There is an urgent need to review current on and of street parking charges. Brent currently has 3/4 empty council car parks and high streets full of cars displaying blue badges and little else because of the high pay and display charges. (It is cheaper in St. John's Wood High street.
Council Response	
The purpose of the consultation is to give residents and opportunity to have their say on the proposed policies. All comments will be considered and policies amended as necessary. Comments and amended policies will be reported back to Committee. The Council's Core Strategy sets a target for schemes of 10 or more homes to provide 50% affordable housing. The affordable housing is to comprise a split of 70:30 social housing to intermediate. Parking charges are outside the scope of the DMP consultation, but comments will be passed on to the relevant team.	

Name	Steffi Cox
General comments	I think they should increase the number of banks in the area and increase the shops for shopping trips too

Council Response	
Proposed policies DMP 1 and DMP 2 seek to promote a diverse mix of uses in town centres to support their viability.	

Name	Ms K.E. Flaum
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Listen to public opinion when planning permissions are sought
Policies on sustainable development	Front and back gardens should not be paved. The council should encourage and promote the benefits of having gardens, especially to stop the rainwater flowing directly into the rivers which can cause flooding
General comments	No telecommunications masts on open spaces. Fryent country park, the Welsh Harp and all of Brent's green spaces must be preserved with no buildings or constructions. They must be kept as nature reserves. Create sensible cycle lanes using the wide pavements.

Council Response	
<p>Proposed policy DMP 1 and 12 states good quality trees, mature shrubs and hedges are to be protected, and that usually at least 50% of a front garden will be expected to be soft landscaped. London Plan policy 5.10 promotes urban greening and landscaping and the use of Sustainable Urban Drainage Systems. Some telecommunications equipment will not require planning permission where it involves development in, on, over or under land controlled by the operator and set out in Part 24 of the General Permitted Development order 1995. In all other cases permission will be required and proposals will be considered against NPPG Telecommunications, which requires telecommunications equipment to be sited to minimise visual impact, and in the first instance the possibility of sharing existing masts should be explored. Equipment should be miniaturised and camouflaged.</p> <p>Fryent Country Park and Welsh Harp are Metropolitan Open Land and therefore given the highest level of protection in both London Plan policy and Brent's Local Plan policies.</p>	

Name	B. Patel
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	In need of more protection
Policies on sustainable development	More security needed

Council Response	
London Plan Policy 7.3 requires new developments to be designed to create safe places, for example by providing natural surveillance through design. Proposed policy DMP 1 and 7 includes policies to protect conservation areas.	

Name	Sheila Charles
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and	I have not seen nor read your proposed policies.

conservation areas.	
Comments - quality, size and type of housing	By talking to them, taking a look at them, seeing their size (e.g. large, obese, tall) then they will need rooms and facilities to accommodate them (i.e. toilets, baths, gardens). Ask them if they have pets, children, then no balconies.
General comments	If you ever remove, destroy, dismantle the Jubilee Clock, then we will know Brent have lost the plot, the clock needs brightening up.
Council Response	
Comments are outside of the scope of the DMP. The Jubilee Clock in Harlesden has been moved 5 metres to allow for a regeneration scheme in the town centre to improve traffic flows. There are no proposals to permanently remove the clock.	

Name	Mrs. Rekha Shah
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	By introducing some strict rules; not allowing shisha cafes for under 18 years old. Things to change after 7pm. Introduce security camera to monitor trouble makers.
Comments - quality, size and type of housing	Not to keep too many people in one site e.g. Wembley Park St. nearby is building too many flats and too high buildings in small space and it is cheap quality. If one or two are bad occupiers, other flats suffer.
Policies on sustainable development	To reduce traffic and schooling shortage, scatter more development around equally in countryside or the North where the industries have declined and the space is detrimental.
General comments	In Brent where I am living for the last 33 years, I have found that schools have been extended, as a result more traffic, shortage of doctors, as a result more patients on waiting list, therefore appointments are unavailable when required. More traffic means more deadlocks.
Council Response	
London Plan Policy 3.18 and 6.3 and DMP1 set out policies related to schools and the relationship between extensions and transport impacts. The addition or extension of schools is needed to meet demand whilst proposals will only be supported if it does not result in unacceptable transport impacts.	

Name	Roger Soyemi
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	I don't know
Comments - quality, size and type of housing	Build more affordable houses and renovate the old ones especially in Kilburn
Policies on sustainable development	Don't know
General comments	Please redevelop and clean up Kilburn High Road, it looks terrible at the moment
Council Response	
The Council's Core Strategy sets a target for schemes of 10 or more homes to provide 50% affordable housing. To be consistent with the National Planning	

Policy Framework (NPPF) this is subject to viability, and all schemes of this scale are accompanied by a viability assessment to provide evidence of the level of affordable housing which can be achieved. This assessment is scrutinised by the Council.

Comments regarding renovating existing affordable housing and cleaning up Kilburn High Road are outside the scope of the DMP but will be passed on to the relevant team. The Site Specific Allocations Document identifies sites within Kilburn Town Centre to be redeveloped for uses which support the viability of the town centre.

Name	Carmel Murphy
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	There are areas that should be preserved for local communities and particularly for youth, elders and visitors.
Comments - quality, size and type of housing	Size - existing buildings and residents get overshadowed - not enough essential services and security (including policing) for local community
Council Response	
<p>Comments noted.</p> <p>Proposed policy DMP 1 provides requires all developments to be designed to protect amenity, including maintaining acceptable levels of lights for future users and existing neighbours.</p> <p>The Core Strategy includes requirements for social infrastructure provision informed by the Infrastructure and Investment Framework. Population growth and the associated requirement for social infrastructure will continue to be monitored and reviewed as required.</p>	

Name	No name
General comments	Brent is becoming too congested - building wise and population wise.
Council Response	
<p>The population of Brent and London as a whole has increased significantly, and this trend is projected to continue. The National Planning Policy Framework requires local planning authorities to meet housing need. Brent's existing Core Strategy sets housing targets to meet identified need and the Site Allocations Development Plan Document (DPD) identifies and allocates sufficient sites to meet this target. The DMP includes policies to ensure development coming forward in the borough is of sufficient quality. It also seeks to protect open space, community facilities and employment land which in light of population growth may come under pressure from housing development. Population growth and the associated requirement for social infrastructure will continue to be monitored and reviewed as required.</p>	

Name	Ivor Estienne
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Greater consultation advertised on radio, local media and social media so that all parties concerned are informed at all stages.
Comments - quality, size and type of housing	Residents sitting on housing committees as well as sitting on planning and development meetings.

Policies on sustainable development	Encourage... from residents on to how sustainable development can be done on a local level - ward by ward or street by street.
Council Response	
Suggestion regarding promoting the consultation on local radio is noted for future. The consultation was promoted on social media including Facebook and Twitter. A press notice was also advertised in Wembley Observer and a press notice issued. The composition of committees is outside of the scope of the DMP, but comments will be passed to the relevant team. The London Plan includes policies requiring development to achieve sustainability standards; however, these will only apply where planning permission is required. The Council's Sustainability Team engages with local residents in promoting sustainability schemes in the borough.	

Name	No name
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Open spaces need not only grass, they also need more wash room areas, flowers to view, more modern buildings about history, with modern antenna's
Comments - quality, size and type of housing	But not always, the jobs are .... Out
Policies on sustainable development	No, because always the facilities and building need repairing.
General comments	Repair first, then think of building anything else anew.
Council Response	
London Plan Policy 7.18 allows for essential facilities on open space where this is necessary to support its function. The Policy applies where a planning application is submitted. Repairing existing buildings is outside the existing scope of the DMP.	

Name	R Mukugi
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	The facilities we had to meet as community group (young and old) are gone from Kingsbury. Old library has also gone...We need drop in centre in Stag Lane area
Comments - quality, size and type of housing	The 3/4 bedroomed houses with alleyways near Kingsbury school are often under used and alleys are dumping ground...often need to help those who want to down size
Policies on sustainable development	By improving civic sense among young people and teaching local history
General comments	Kingsbury was an outer London borough. Now it has become an inner London borough with no cohesion only loads and loads of people with different identities. I liked the old British civic sense and decided to settle here 55 years ago. Unfortunately it is disappearing.
Council Response	
London Plan Policy 3.16 deals with protection of social infrastructure. Where community facilities have been lost, this has only done in light of a replacement facility or there was no longer a need for the facility.	

Name	L. Hunt
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	When building on sites a space for the community should be provided - community hall, play area etc.
Comments - quality, size and type of housing	Family homes are not being built just blocks of flats
Council Response	
<p>The Core Strategy includes requirements for social infrastructure provision informed by the Infrastructure and Investment Framework. This includes a requirement for new community space to be delivered.</p> <p>There is an identified need for family housing in the borough. The Council has a target for 25% of housing on major schemes to be family housing, and for conversion schemes to retain ground floor family housing.</p>	

Name	Mrs. A.D. Vgras
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	
General comments	3 B: We need more indoor facilities where toddlers, children up to 5/6 years can spend some time with their parents when the weather is bad
Council Response	
Noted. The Core Strategy includes requirements for community facilities (social infrastructure) informed by the Infrastructure and Investment Framework. This includes community space, which may serve such a purpose.	

Name	David Roberts
General comments	I think the project has been well thought through, well researched and has taken the residents' considerations into account
Council Response	
Noted.	

Name	No name
Comments - quality, size and type of housing	Build more council houses and never sell these houses.
Policies on sustainable development	Do not see enough cycling promotion. Do not see enough encouragement for walkers.
General comments	More council flats and never sell these flats.
Council Response	



Brent's policies support the delivery of affordable housing in the borough. The Council's Core Strategy sets a target for schemes of 10 or more homes to provide 50% affordable housing. To be consistent with the National Planning Policy Framework (NPPF) this is subject to viability, and all schemes of this scale are accompanied by a viability assessment to provide evidence of the level of affordable housing which can be achieved. This assessment is scrutinised by the Council. Brent Housing Partnership identify Registered Social Landlords (RSLs) to work with developers where planning policy requires more affordable housing. Cycling and Walking are covered by London Plan Policy 6.9 and 6.10 amongst others. These require developments ensure safe and convenient access for pedestrians and cyclists. Major developments will be expected to contribute towards improvements in links to and on the London Cycle Network.

Name	Man Mohian Gupta
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	I need to be able to read these.
Comments - quality, size and type of housing	See above
Policies on sustainable development	I would like to 1) grow my own food 2) weave my own cloth 3) milk my own cows (!?!?) 4) build my own shelter 5) produce everything I need 6 use everything I produce in Willesden Green
General comments	I need a copy of the proposed policies
Council Response	
Copies of the document were available in all libraries, online or by request during the consultation period.	

Name	Mrs A. Klein
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	More stringent planning laws
Comments - quality, size and type of housing	Stop 'buy to let', compel landlords to maintain their properties, they are ruining the neighbourhood.
Policies on sustainable development	
General comments	Restore libraries. Remember your residents, who have always paid their council tax. Stop all the 'frills'. All we need is clean streets and open spaces.
Council Response	
<p>Permitted Development rights are set nationally; therefore the Council has limited powers to make planning powers more stringent. In exceptional circumstances where there is evidence of a strong local need the Council can introduce Article 4 Directions to remove permitted development rights. The Council has introduced Article 4 Direction in its Conservation Areas for example.</p> <p>From 1 January 2015, most private landlords and letting agents will need a licence to let out a house or flat. The Council will use its licensing powers to help raise standards in the private housing sector, creating high quality and affordable accommodation for Brent residents.</p> <p>Landlords and agents running unlicensed properties could be prosecuted and fined up to £20,000.</p>	

Name	Cllr. Tom Miller
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Conservation areas ignored too often in planning. Suggest a pub protection policy where pub important for local community.
General comments	We need more positive protection for existing community assets, including ACVs and buildings with a community function - including those engaged in retail and business.
Council Response	
<p>Planning policies can not be used to prevent buy to let.</p> <p>Proposed policy DMP 13 on heritage includes policies to protect the character of conservation areas. In light of responses the DMP has been amended to include a distinct pub protection policy.</p> <p>London Plan includes policy to protect community facilities. Supporting text clarifies the Council will give significant weight to the protection of Assets of Community Value.</p>	

Name	H. Backhouse - Olaturyi
Comments - quality, size and type of housing	Social housing must be prioritised.
Council Response	
Noted.	

Name	Kenneth H. Travis
General comments	Noise levels in streets, residential and shopping, frequently disturbing. More effort should be made to restrict parking, especially on narrower roads.
Council Response	
<p>In considering applications for non-retail uses consideration will be given to their impact on amenity including effectiveness of measures to mitigate litter, undue smell, odours, noise and impact on parking. Proposed policy DMP 1 seeks to protect residential amenity.</p> <p>Proposed policy DMP 12 on car parking includes measures to limit parking. For example by not supporting developments which add to on-street parking demand where on-street parking spaces cannot meet existing demand, or where it would have a detrimental impact on Controlled Parking Zones.</p>	

Name	Dr. Anthony S. Travis
General comments	Noise, overcrowding of vehicles, rodents in area shown to rear of establishments (food/restaurants)0 Carlton Avenue East at intersection with Preston Road. I have no wish to interfere on their legitimate trading, but consider any extension/enlargement to be a clear threat to residents' amenities. I trust that this will not happen.
Council Response	
In considering applications for takeaways, cafes and restaurants consideration will be given to their impact on amenity including effectiveness of measures to mitigate litter, undue smell, odours, noise and impact on parking.	

Name	No name
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Not enough explanation regarding policies on open spaces. Some open spaces are not marked on the maps. All open spaces are of value. Protect them all. I have not seen an mention of historic buildings.
Comments - quality, size and type of housing	No high rise blocks of flats. Include all green spaces and play areas in all developments. Do not build where there are no school places.
Policies on sustainable development	Building in Brent is not sustainable as there are no school places for additional primary pupils.
General comments	Infrastructure not mentioned i.e. having enough GPs, dentists, local shops, police, etc.
Council Response	
Green space of local value are all marked on the borough map enclosed within the consultation question form. Policies regarding open spaces fall under London Plan Policy 7.8. For infrastructure loss, please refer to London Plan Policy 3.16.	

Name	No name
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Need more green areas and play areas for children. Employment sites have housing next to it makes the area look grey - concrete jungle.
Comments - quality, size and type of housing	The buildings are too close to each other.
Policies on sustainable development	The buildings are too close to each other which will cause traffic jams, which is not sustainable.
Council Response	
London Plan Policy 7.18 seeks to protect open spaces, whilst the Core Strategy includes a requirement for new open space within growth area. In addition, London Plan Policy 3.16 includes standards for amenity space provision and play space, which will apply to all new residential units. The DMP includes policy to protect residential amenity DMP 1.	

Name	Jonathan Carey
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Look into other ways as into how to give greater protection, we need more information from the general public, community and the local police.
Comments - quality, size and type of housing	There is need to look more in depth as into what housing is really needed and what is not needed.
Policies on sustainable development	I like the idea of the proposed policies as long as it can benefit all who work, live and shop in the borough of Brent.
General comments	
Council Response	Noted. The Council's housing strategy and Strategic Housing Market Assessment provide detailed evidence on what from of housing is needed in the borough.

Council Response

Name	Loraine Evans
General comments	I would hope that local people are given priority with social and affordable housing.
Council Response	
This is outside the scope of the DMP, however, unless you have lived in Brent continuously for 5 years under the Brent Housing Allocation Policy you will not usually be eligible to bid for social housing.	

Name	No name
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Limit number of new flats being built.
Comments - quality, size and type of housing	Build on brown filled sites.
General comments	Need a variety of shops in Kingsbury High Road, too many fruit and veg shops. Cycle path at top of high road is dangerous. Pavements are dirty. Demand for an all purpose store like Wilkinsons.
Council Response	
The council deals with town centres within DMP 2. It encourages the variety of uses so that particular types of shop do not dominate the high street frontage.	

Name	Owen Brewerton-Owen
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Block planning applications that significantly alter historic buildings/ propose changes how such new developments can incorporate historic features.
Comments - quality, size and type of housing	Need to focus on high quality of design of housing, especially high end which is lacking in the borough. Need to do more to attract developers to build quality apartments that will improve the area.
General comments	Seek strong chain brands to come to Brent i.e. Waitrose. Promote the right developers to investing Brent i.e. what has happened to Willesden Green Cultural Centre is excellent. Commit more funds to high street/open space improvements.
Council Response	
The council's policies regarding heritage is addressed by DMP 7. Development will only be encouraged if it enhances the area's appearance or positively contributes to it. The council also has a policies concerning town centre design, see DMP 2, in order to create attractive street frontages.	

Name	Simon Watkins
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Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Introduce a policy to prevent estate agents' boards being fixed above shop fronts. Identify open spaces in town centres
Comments - quality, size and type of housing	No policies to prevent foreign investors buying. New general needs... and then renting back to the council.
Policies on sustainable development	Code level 3 for housing is lower than Mayor for London's guide of code level 4.
General comments	Car parking in local shopping centres should be protected from redevelopment as it supports local shopping. On street parking metered spaces should be cheap and well managed to increase local shopping.
Council Response	
Parking policies fall under DMP 12. The council is determined to ensure that where development takes place there is provision for parking space. However, if where possible i.e. close proximity to good transport links, the council strongly encourages use of public transport in order to ease congestion along high streets and other high traffic density hotspots.	

Name	Roger Macklen
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	By reducing the risks to death and a decent life and damaging the whole ethical structuring of our society
Comments - quality, size and type of housing	To provide decent facilities e.g. good public transport to get local needs to connects to the whole community. Good facilities e.g. shops for the local neighbourhoods, produce better social/affordable housing
Policies on sustainable development	By focusing on what the people want and not to increase the developer's profits.
Council Response	
In line with London Plan Policy 3.4 development is to be focused where public transport accessibility is sufficient to serve the scale and function of use. Where a development is likely to have a significant impact on public transport services, proposed policy London Plan Policy 6.3 requires contribution to satisfactorily mitigate the impact, before development can go ahead. Proposed policy DMP 4 protects shops which meet a local need. Design standard related to London Plan Policy 3.5 and Housing SPG apply to all housing types including affordable and market.	

Name	Emma Geoeon
General comments	Please can you stop giving alcohol licenses to small food shops
Council Response	
Licencing is separate to planning controls and therefore outside of the scope of the DMP, however, comments will be passed to the Licencing Team.	

Name	No name
Comments on policies on protection of employment sites, community facilities,	Community facilities to include theatre, museums and art galleries.

open space, historic buildings and conservation areas.	
Council Response	
Comment noted. Text amended to make it clear social infrastructure includes cultural facilities.	

Name	Noreen Nolan
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Please don't build on them.
Comments - quality, size and type of housing	More genuinely affordable housing. In Alpertown, the proportion is not high enough, and the market costs of even studio flats is too high.
Policies on sustainable development	No the return of high prices is a negative development. It has taken years to demolish the old Chalkhill and Stonebridge estates and they had bred crime and a very poor quality of life. High density housing without services is unsustainable.
Council Response	
Affordable housing is addressed by London Plan Policy 3.10. It encourages that new development include a certain proportion of affordable housing in order to meet the high demand. It is genuinely affordable in the sense it complies with eligibility for social housing as determined by local prices and incomes.	

Name	No name
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Stop having encroachment of parks and pavements
Comments - quality, size and type of housing	Must be resident for at least five years and have paid income for 10 years to qualify for government housing. Evicted tenants should not qualify
General comments	Too much is done for so called asylum seekers at the expense of local population. First priority should be given to those who have paid taxes for at least 10 years.
Council Response	
The protection of open spaces is addressed by London Plan Policy 7.18 and the protection of playing pitches is addressed by Policy 3.19.	

Name	Joy Harper
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Protect park and open spaces - not available for further development.

Comments - quality, size and type of housing	No - ...plan selling to cash out of borough individuals.
Council Response	
The protection of open Space falls under London Plan Policy 7.18 and will only be subject to development under very special or exceptional circumstances. There are also policies regarding provision of cycle and pedestrian networks in the London Plan - Policy 6.9 and 6.10; the council seeks developers to enhance use of these modes, see also DMP 10.	

Name	Michael Butcher
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	General rising of the profile of the area. Restrict the amount of shops that raise anti social behaviour.
Comments - quality, size and type of housing	Wembley under development so it will improve as time goes by.
Policies on sustainable development	Once again with the money being spent on Wembley, development will continue.
Council Response	
The DMP seeks to set a cap on the proportion of betting shops, takeaways, pawnbrokers and pay day loan shops in town centres. This is to promote viable centres with a balanced mix of uses. In addition proposed policy DMP 3 states in determining applications for non-retail uses consideration will be given to impact on local amenity including nuisance and anti-social behaviour, e.g. DMP 1.	

Name	Hazel Sawyers
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	I got to page 54 of the Draft Development Management Plan Doc. And I began to lose the will to live. There has got to be a simpler/better way to communicate with me.
General comments	I answered questions 1 and 2 without reading the documents as the answers to these questions are obvious. I found it difficult to answer questions 3-8 as I really couldn't get my head around all the info. (Please note that I am educated to post-graduate level) I wouldn't dare to think of what others may have thought of these turgid documents.
Council Response	
The comment form which accompanied the full document attempted to provide a short breakdown of key policies. It is necessary for the document to use certain technical language to be consistent with the National Planning Policy Framework and London Plan.	

Name	Mr Duvgesh Jhepa
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and	By creating greater relationships between the police and the community.



conservation areas.	
Comments - quality, size and type of housing	Being an estate agent I am fully aware of how many clients we turn down because they are claiming benefits.
Council Response	
It is acknowledged there is a need for affordable housing in the borough, including social rented. The Council's Core Strategy sets a target for schemes of 10 or more homes to provide 50% affordable housing. This is to be split 70:30 social/affordable to intermediate.	

Name	Ms Jamie Lunn
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Stop building or developing of our green spaces, parks and recreation grounds and provide more community sports i.e. swimming pool in Wembley Central
Comments - quality, size and type of housing	We need more family size homes. More affordable and increase the mandatory m2, all flats should have an outside community space as mandatory if no gardens.
General comments	In order to change the look of Wembley, planning policy has to change and become more proactive, and rigid enforcement is required to maintain it. Stricter guidelines in favour of residents not pondering to developers.
Council Response	
<p>The protection of open spaces is addressed by London Plan Policy 7.18 and the protection of playing pitches is addressed by Policy 3.19. The Core Strategy includes targets for additional swimming pools in the borough in line with the recommendations of the Planning for Sport and Active Recreation Facilities Strategy.</p> <p>There is an identified need for family homes in the borough. The Core Strategy sets a target for 25% of homes in major developments to be family sized. All new development will meet the minimum space requirements as set out in the London Plan. In addition the DMP 19 includes standards for amenity space of 20sqm per flat and 50sqm for family housing.</p>	

Name	Jayshree Pate
Comments on policies on protection of employment sites, community facilities, open space, historic buildings and conservation areas.	Replace pawnbrokers with community services and employment sites. Pawnbrokers increase muggings as muggers can get cash without being questioned.
Comments - quality, size and type of housing	There are council houses in borough that are not fully occupied e.g. only one person lives in some houses.
Policies on sustainable development	Keep more greens instead of building too many flats.
Council Response	
<p>The DMP seeks to introduce policies to set a cap on the proportion of pawnbrokers in town centres. However, the Council does not have the power to close down existing pawnbrokers and replace them with alternative uses.</p> <p>The DMP includes policies to protect green spaces and for green infrastructure to be provided as part of new developments.</p>	