

Appendix 1 - Main Modifications as Approved by the Planning Inspector

The modifications below are expressed in the conventional form of ~~strikethrough~~ for deletions and **bold** for additions of text.

The page numbers and paragraph numbering below refer to the submission Brent DMP Plan (September 2015), and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	4	1.1	<p>Amend paragraph 1.1 as follows:</p> <p>'This Development Management Policies document. It sets out the Council's policies which along with other policies within the Development National Planning Policy Framework, London Plan, Brent Local Plan and Neighbourhood Plans will be used for the determination of planning applications for development in the borough. The National Planning Policy Framework and associated National Planning Practice Guidance sets out the Government's requirements from the planning process in England. Local Planning Authorities are required to plan for their areas and make decisions on planning applications that are consistent with national policy. Within London there is strategic policy set out by the Mayor in the London Plan, this also has to be consistent with national policy. Brent's Local Plan has to be consistent with both national policy and the London Plan. There is also an opportunity but not a requirement for neighbourhoods to adopt neighbourhood plans. Neighbourhood Plans generally seek to provide a finer grain of planning policy for their areas, focussing on very local issues. Again however, they have to be consistent with national policy and strategic policy set out in the London Plan and Brent's Local Plan. To date, whilst there has been interest in neighbourhood planning in Brent, only one neighbourhood plan has been adopted in Brent; the Sudbury Town Neighbourhood Plan in 2015. It will complete Brent's new Local Plan (previously known as the Local Development Framework), and will replace Brent's remaining saved UDP policies.'</p>
MM2	4	1.1	<p>Insert new paragraph after 1.1 as follows (with renumbering of subsequent paragraphs in chapter 1):</p> <p>1.2 From 1st April 2015 a Mayoral Development Corporation, the Old Oak and Park Royal Development Corporation (OPDC), became the Local Planning Authority for the purpose of plan</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>making and determining planning applications within the OPDC area. This includes areas within the administrative boundaries of the London Boroughs of Brent, Ealing and Hammersmith and Fulham. The OPDC is taking forward its own Local Plan for its area which it is anticipated will be adopted in 2017. As such the Brent Development Management Policies Document only applies to the remaining area of Brent outwith the OPDC boundary, where the Council continues to be the Local Plan making authority. The existing adopted Brent Local Plan documents will remain as within the OPDC boundary until they are replaced by the OPDC Local Plan.</p>
MM3	4	1.2	<p>Amend numbering and text as follows:</p> <p>1.2 1.3 The Council is required to prepare the Local Plan by the Planning and Compulsory Purchase Act 2004 (as amended). The Local Plan is made up of a number of documents. This includes this Development Management Policies document, as well as the Core Strategy (this sets out strategic policies such as the number of houses to be built and additional to be provided jobs in the Borough), Site Specific Allocations Development Plan Document (which identifies uses and development principles for major development sites in Brent), the Wembley Area Action Plan (focusing on Wembley town centre and the regeneration around the National Stadium) and the Joint West London Waste Plan (identifying sites for waste facilities and how waste will be dealt with). Policies within the Wembley Area Action Plan area will take precedence where there are locally specific policies covering subjects that might also be covered by this Plan. The Local Plan will also be supplemented by more detailed guidance in the form of Supplementary Planning Documents. The documents that make up the Local Development Plan are illustrated in Figure 1. Alongside the London Plan, these documents provide the planning framework for the borough, guiding change to 2029 and beyond.'</p>
MM4	6	Policy DMP 1 - Development Management General Policy	<p>Amend criteria d and g in Policy DMP 1 as follows:</p> <p>d. preserving conserving or enhancing the significance of heritage assets and their settings;</p> <p>g. not unacceptably increasing exposure to flood risk, noise, dust, contamination, smells, waste, air quality, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality;</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM5	7	2.8	<p>Amend paragraph 2.8 as follows:</p> <p>'Heritage assets include a wide variety of statutorily designated and non-designated features. Some are protected by law and cannot be materially altered without consent, e.g. listed buildings and scheduled monuments. This statutory protection together with national planning policy also places a legal duty on the Council to seek to preserve conserve or enhance the significance of of such assets and their settings. As such, developments affecting a heritage asset will be required to show that it seeks to conserve preserve or enhance its significance and its setting.'</p>
MM6	9	Policy DMP 2 – Supporting Strong Centres	<p>Delete the design section from Policy DMP 2, as follows:</p> <p>Design Proposals for shop fronts and forecourts will be required to retain shop fronts of architectural or historic merit, demonstrate a high quality of design, complementing the building and adjoining properties. Forecourt trading will be permitted where it does not cause an obstruction to pedestrians or nuisance to neighbouring residential occupiers.</p>
MM7	10	Policy DMP 3 – Non-Retail Uses	<p>Amend Policy DMP 3 as follows:</p> <p>Betting shops, adult gaming centres and pawnbrokers</p> <p>Betting shops, adult gaming centres and pawnbrokers will be permitted where it will result in:-</p> <ul style="list-style-type: none"> • no more than 4% of the town or neighbourhood centre frontage consisting of betting shops; • no more than 3% of the town or neighbourhood centre frontage consisting of adult gaming centres or pawnbrokers/payday loan shops; • no more than 1 unit or 10% of the neighbourhood parade frontage, whichever is the greater, consisting of betting shops, adult gaming centres or pawnbrokers/payday loan shops; • a minimum of 4 units in an alternative use in-between. <p>Takeaways</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Subject to other policies within the development plan, takeaways will be approved except where it would result in:-</p> <ul style="list-style-type: none"> • an A5 use within 400 metres of a secondary school or further education establishment entrance/exit point; • more than 6% of the units within a town or neighbourhood centre frontage in A5 uses; • more than 1 unit or 15% of the units within a neighbourhood parade, whichever is the greater, in A5 use; • less than two non-A5 units between takeaways; or • on-street parking in front of the premises creating highway safety problems. <p>Policy WEM 26 in the Wembley Area Action Plan applies to takeaways in Wembley and Wembley Park centre.</p> <p>Shisha Cafés</p> <p>Shisha Cafés will only be permitted outside 400 metres of a secondary school or further education establishment entrance/exit point.</p>
MM8	11	Policy DMP 4 – Neighbourhood Centres and Isolated Shop Units	<p>Amend policy title as follows:</p> <p>‘Neighbourhood Centres Parades and Isolated Shop Units’</p> <p>Amend policy text as follows:</p> <p>‘Loss of A1, A2, or A3 uses or launderettes in neighbourhood centres parades or isolated shop units outside designated town centres will be permitted where the centre parade or unit:– a. is within 400 metres of equivalent alternative provision; and</p> <p>b a. is unviable; or</p> <p>c b. the proposal will provide a community facility for which there is a demonstrable need.</p> <p>Where there is no equivalent alternative provision within 400 metres, loss will not be permitted</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>unless retention is unviable for these range of uses with associated evidence to show that the premises having been vacant and actively marketed for a minimum of 2 years.</p> <p>Where permitted sympathetic retention of any existing shop front will be required unless a high quality alternative more sympathetic to the building's qualities or street scene will be delivered.'</p>
MM9	12	3.14	<p>Insert new sub-section title and text after paragraph 3.14 as follows (and carry out subsequent paragraph renumbering in chapter 3):</p> <p>Shop Front Design and Forecourt Trading</p> <p>3.15 Shop fronts play a key role in establishing the character of Brent's town centres and neighbourhood parades. Policy DMP 4a is to ensure shop fronts and forecourts contribute to an attractive environment. It is supplemented by detailed guidance in the emerging Shop Front Supplementary Planning Document.</p>
MM10	12	Policy DMP 4a – Shop Front Design and Forecourt Trading	<p>Insert new Policy DMP 4a after new paragraph 3.15, as follows:</p> <p>'Proposals for shop fronts and forecourts will be required to retain shop fronts of architectural or historic merit, and demonstrate a high quality of design, complementing the building and adjoining properties.</p> <p>Forecourt trading will be permitted where it does not cause an obstruction to pedestrians or nuisance to neighbouring residential occupiers.'</p>
MM11	13	Policy DMP 6 – Visitor Accommodation and Attractions	<p>Amend second paragraph in Policy DMP 6 as follows:</p> <p>'....Proposals for hotel development must be inclusive and accessible and are with applications for detailed planning permission to be accompanied by Accessibility Management Plans.....'</p>
MM12	18	Policy DMP 7 – Brent's Heritage	<p>Amend Policy DMP 7 as follows:</p> <p>'Proposals for or concerning affecting heritage assets should:</p>

Ref	Page	Policy/ Paragraph	Main Modification
		Assets	<p>a. demonstrate a clear understanding of the archaeological, architectural or historic significance and its wider context;</p> <p>b. provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the development on the heritage asset and its context as well as any public benefit;</p> <p>c. retain buildings, structures, architectural features, hard landscaping and spaces and archaeological remains, where their loss of which would cause harm;</p> <p>d. sustain and enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the streetscene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and plan form and ensure that extensions are not overly dominating;</p> <p>e. contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation;</p> <p>f. where demolition is proposed within a conservation area detailed plans for any replacement building will be required to allow consideration of whether the replacement would contribute positively to the character or appearance of the area. In cases where demolition is permitted conditions and/or legal agreements will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures.'</p>
MM1 3	19	4.23	<p>Amend paragraph 4.23 as follows:</p> <p>'.....Policy DMP 7 'Brent's Heritage Assets', therefore, specifically seeks to protect Brent's heritage and seeks to ensure that the case for conservation and enhancement is fully considered when assessing all proposals for new development. There must also be The Policy also seeks to safeguard the potential for further investigation on sites and buildings where the heritage asset's significance may hitherto be acknowledged and as archaeological sites become available be previously undiscovered. Archaeological Priority Areas and Archaeological Sites indicate where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. However, sites of archaeological importance could be discovered elsewhere in the borough.'</p>
MM1 4	19	4.25	<p>Amend paragraph 4.25 as follows:</p> <p>'The Council supports and recognises that change is necessary, but change needs to be managed in a way which does not compromise heritage significance and exploits opportunities for enhancement. Any proposal</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>must have special regard to the desirability of preserving a heritage asset or its setting or any features of special archaeological, architectural or historic interest which it possesses..... This is because some forms of development, including extensions, roof extensions, dormers and outbuildings may not be subordinate (overly dominating) to the a property, harming its character, integrity and appearance.....'</p> <p>Add additional paragraph after 4.25 as follows (with subsequent paragraph renumbering in chapter 4):</p> <p>'Special regard will be given to proposals near or affecting heritage assets identified as at risk on Historic England's Heritage at Risk Register. The Council will use its development management and other planning powers to secure the future beneficial viable use of the borough's heritage assets. For archaeological assets, the layout of the development, extent of basements and design of foundations may need to provide for physical preservation. If significant archaeological remains are not to be preserved in-situ then appropriate investigation, analysis, publication and archiving will be required.'</p>
MM1 5	20	4.26	<p>Amend paragraph 4.26 as follows:</p> <p>'When considering any planning application (including demolition) that affects a conservation area the Council will require the retention of all buildings and structures which make a positive contribution to the significance of a conservation area. Similarly new proposals must pay special attention to the desirability of sustaining conserving or enhancing the character of and appearance of that area. This can be achieved either by a positive contribution to preservation or by development which leaves character of and appearance unharmed, that is to say sustained conserved. Development located within, adjacent to, or otherwise affecting the setting of a conservation area will be permitted where the visual and functional impact of the proposals can be demonstrated to conserve preserve or enhance:....'</p>
MM1 6	24	Policy DMP 9 – Waterside Development	<p>Amend section b of Policy DMP 9 as follows:</p> <p>b. Developments adjacent to the Blue Ribbon network and other tributaries, or with potential to negatively impact on its water quality will be required to contribute towards restoration and naturalisation of waterways, and seek to enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive and Thames River Basin Management Plan.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM1 7	26	6.5	Amend paragraph 6.5 as follows: <p>'.....The boundaries of the borough's Quiet Areas, as shown on the Policies Map, are considered to be consistent with the open space designations for Fryent Country Park, open space on the north side of The Welsh Harp, Roundwood Park/Willesden New Cemetery, Paddington Cemetery and Alperton Cemetery as shown on the Policies map, and can be provided by the Planning Policy Team on request.'</p>
MM1 8	30	6.22	Insert additional sentence at the end of paragraph 6.22 as follows: <p>'This has to take account of the latest climate change allowance as identified by the Environment Agency, but take a precautionary approach to reducing long term risk based on the fact that such allowances are subject to periodic review.'</p>
MM1 9	30	Policy DMP 9a – Managing Flood Risk	Insert new Policy DMP 9a after paragraph 6.23, as follows: <p>'A. Proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction and:</p> <ul style="list-style-type: none"> a. minimise the risk of flooding on site and not increase the risk of flooding elsewhere; b. wherever possible, reduce flood risk overall; c. ensure a dry means of escape; d. achieve appropriate finished floor levels which should be at least 300mm above the modelled 1 in 100 year plus climate change flood level; and e. not create new basement dwellings in areas of high flood risk. <p>B. Proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.</p> <p>C. Opportunities will be sought from the redevelopment of sites in functional floodplain (flood zone 3b) to restore the natural function and storage capacity of the floodplain. Proposals that involve the loss of functional floodplain or otherwise would constrain its natural function, by</p>

Ref	Page	Policy/ Paragraph	Main Modification
			impeding flow or reducing storage capacity, will be resisted.'
MM2 0	30	6.26	Amend sub-title 6.26 as follows: 6.26 On Site Water Management and Surface Water Attenuation
MM2 1	30	6.26	Insert new paragraph after 6.26 as follows (with subsequent paragraph renumbering in chapter 6): 'The London Plan in Policy 5.15 'Water Use and Supplies' identifies the pressure on London's water supply related to existing scarcity which will be exacerbated by climate change and population growth. Similar to most of London, Brent also has areas of combined sewer network which does not have the capacity to deal with extreme events, consequently causing pollution to water courses. As such, consistent with London Plan policy, it is necessary to ensure that water use is limited to protect supply, but also reduce potential for pollution. The 105 litres target is consistent with Part G2 of the optional requirement of the 2010 Building Regulations which specifies maximum consumption values for water fittings. Conditions will be applied to planning permissions to ensure the requirement to meet these building regulations.'
MM2 2	30	Policy DMP 9b – On Site Water Management and Surface Water Attenuation	Insert new Policy DMP 9b after paragraph 6.27, as follows: 'A. Proposals for new development will be required to make provision for the installation and management of measures for the efficient use of mains water and for the control and reduction of surface water run-off. Substantial weight will be afforded to the target for mains water consumption of 105 litres or less per person per day and to the achievement of greenfield run-off rates. Where greenfield run-off rates cannot be achieved this should be clearly justified by the applicant. B. The design and layout of major development proposals will be required to: a. use appropriate sustainable drainage measures to control the rate and volume of surface water run-off; b. ensure where feasible separation of surface and foul water systems; c. make reasonable provision for the safe storage and passage of flood water in excessive

Ref	Page	Policy/ Paragraph	Main Modification
			<p>events; and</p> <p>d. demonstrate adequate arrangements for the management and maintenance of the measures used.</p> <p>C. Proposals for minor developments, householder development, and conversions should make use of sustainable drainage measures wherever feasible and must ensure separation of surface and foul water systems.</p> <p>D. Proposals that would fail to make adequate provision for the control and reduction of surface water run-off will be refused.'</p>
MM2 3	32	7.8	<p>Amend paragraph 7.8 as follows:</p> <p>'.....Only where it is clearly demonstrated carbon reduction targets cannot be fully met on site, any shortfall may be off-set through 'Allowable Solutions' local carbon off-setting.'</p>
MM2 4	33	7.13	<p>Amend paragraph 7.13 as follows:</p> <p>'.....Only if the feasibility study in the Energy Assessment demonstrates that all on-site options have been considered and are not feasible, will Allowable Solutions carbon off-setting be considered. In accordance with emerging London Plan Policy 5.2 developers should actively seek to deliver their remaining Allowable Solutions carbon savings through local carbon saving projects. Brent Council will establish a price per tonne for carbon or use a nationally recognised price such as that set by the Zero Carbon Hub, and seek payment into a local fund which will be used to deliver Brent's emerging Allowable Solutions carbon off-setting in the borough Strategy.'</p>
MM2 5	37	Policy DMP 11 – Forming an Access onto a Road	<p>Amend the first section of Policy DMP 11 as follows:</p> <p>'Other than the North Circular Road, TLRN and London Distributor Roads applications for the creation of an access to a highway or where development will result in the increased use of existing access points will be acceptable where:...'</p>
MM2	38	8.18	<p>Insert additional sentence on the end of paragraph 8.18 as follows:</p>

Ref	Page	Policy/ Paragraph	Main Modification
6			'In relation to criterion c) of the policy, greater flexibility to the loss of more than one parking space may in exceptional cases be justified. An example might be where off-street parking provided as part of a proposed development together with other measures would reduce the on-street parking demand compared to the existing use.'
MM2 7	43	Policy DMP 14 – Employment Land within SIL and LSIS	Amend the second section of Policy DMP 14 as follows: '.....For developments falling under criteria a) the development shall incorporate employment uses providing high density employment an efficient use of land on approximately 20% of the site area . The Council will expect the existing restrictive allocation of the site as SIL or LSIS and the fact that the site will be of low quality for employment use to be recognised in the residual land value assumed for the site.'
MM2 8	43	Policy DMP 14 – Local Employment Sites	Amend the third section of Policy DMP 14 as follows: '.....Where non-employment uses are proposed the site shall incorporate the maximum amount of existing floorspace type or Managed Affordable Workspace possible or if unviable employment space that meets an identified need in the borough.
MM2 9	44	9.2	Amend paragraph 9.2 as follows: 'To help retain an appropriate balance of supply and demand of industrial land over the planning period the Brent Employment Land Demand Study identifies low quality employment sites, where a more flexible approach to changes of use away from industrial uses could be appropriate. This will be taken into account in identifying which sites are suitable for release, alongside the need to achieve the strategic objectives in the Development Plan, to achieve at least 50% affordable housing on sites and to meet an identified need for secondary schools. Sites within SIL and LSIS which scored highly in the qualitative assessment and remain suitable for employment uses will be retained. It is recognised for instance that some sites might have unusually high remediation or other abnormal costs to be met to make them acceptable as a residential environment. As such, in the evidence used within any viability testing to support the case for any affordable housing provision below 50% on an individual

Ref	Page	Policy/ Paragraph	Main Modification
			scheme, the Council will expect the benchmark land value of the site to be consistent with the Existing Use Value (EUV) of its allocation as SIL or LSIS. An appropriate site specific premium over the EUV to provide a competitive return to the landowner will be expected, which reflects the low quality of the employment site.'
MM3 0	44	9.2	<p>Insert new paragraph after 9.2 as follows, and renumber subsequent paragraphs accordingly:</p> <p>'To create mixed use areas and limit the loss of employment land and jobs, where redevelopment for predominantly residential purposes is proposed where possible (and subject to viability) approximately 20% of the site area should be used for employment purposes. The type of employment use will depend on the characteristics of the site and its compatibility with the residential development, however the Council would prefer higher employment ratios and the efficient use of sites to maximise employment generation. Where the viability of delivery of affordable housing is being affected by the re-provision of employment space, the Council will seek to prioritise affordable housing delivery whilst recognising that successful places usually comprise a mix of uses, rather than being wholly residential.'</p>
MM3 1	47	Policy DMP 15 – Affordable Housing	<p>Amend point 2 in Policy DMP 15 as follows:</p> <p>2. on major phased development sites or major sites where housing development commences 18 months after consent is issued, the proportion of affordable housing agreed is significantly below 50% appropriate provisions to re-appraise scheme viability will be sought at agreed stages in S106 agreements to secure contingent obligations.</p>
MM3 2	47	Policy DMP 15 – Affordable Housing	<p>Insert two additional criteria in the Vacant Building Credit section of Policy DMP 15 as follows:</p> <p>3. buildings where evidence of concerted marketing activity at appropriate rents levels and terms for the quality of the existing accommodation has taken place</p> <p>4. buildings that have not been abandoned, made vacant for the purposes of development or subject to extant or recently expired planning permission for the same or substantially the same development</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM3 3	48	10.9	<p>Amend paragraph 10.9 as follows:</p> <p>'The predominant Brent affordable housing need is for social/affordable rented accommodation (as evidenced by the latest Brent Strategic Housing Market Assessment). This accommodation requires significant amounts of subsidy to be provided in new developments. Changes in national policy mean that for those submitting planning applications social rented properties are less likely to be provided as the preferred rented accommodation for affordable dwellings. In the majority of cases affordable rented dwellings (defined as up to 80% market rent) are most likely to be proposed. The incorporation of affordable rented accommodation (rather than social rent) within developments has been assumed in the latest viability assessment used to support affordable housing policies. As a recognised affordable tenure the provision of such accommodation where social rent is not possible to otherwise meet affordable needs is accepted and supported by the Council. Nevertheless within the policy the Council has incorporated social rent to allow for situations where the Council (as a developer/landowner) or other registered providers are seeking to provide such tenures as part of the affordable housing mix. The need for intermediate affordable housing (such as shared ownership) is more limited, as such the tenure mix target ratio for affordable housing is set at 70:30 rent to intermediate housing. Whilst in terms of meeting needs this is the appropriate ratio for the borough, site specific viability considerations, site and area characteristics may result in a different appropriate mix, such exceptions could include:....'</p>
MM3 4	49	10.14	<p>Amend paragraph 10.14 as follows:</p> <p>'NPPG provides some guidance on Vacant Building Credit. However, further clarity is needed to define qualifying buildings, floorspace measures and vacancy and whether the application of the credit is assisting a development opportunity in addition to that which might otherwise have occurred in any case. The Community Infrastructure Levy (CIL) regulations clearly define what a building is. As it is likely an assessment of existing floorspace will be used to reduce CIL liability it is sensible for the same measure to be used. The same is true of building measurements, which use gross internal area. CIL regulations also set out a timescale related to minimum time of occupation to gain exemptions to CIL liability. There is a logic in using an approach to identify the qualifying periods for vacancy that is consistent with this approach. NPPG sets out where the credit will not apply. It outlines scenarios which the local planning authority may take into account in its application having regard to the intention of national policy. It regards the intention of the national policy of the Credit of encouraging</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>development of long term vacant sites where there is no realistic prospect of that site being used for its existing use, or there not being a realistic prospect of it being developed for other purposes without the financial incentive afforded by the Credit. Therefore to avoid any doubt it seeks to confirm that it will apply the scenarios set out in NPPG in Policy DMP 15 to remove the possibility of perverse incentives to delay development or provide rewards on sites that have or would in any case be subject to development proposals. In support of applications, as well as proof of vacancy for the time period, evidence of concerted marketing activity at appropriate rents levels will be required. The Council will also want to be assured in addition that no other mechanisms, such as the terms of the lease are such that they would act as a disincentive to occupation and thus promote the building's continued vacancy, e.g. a short lease period despite significant likely capital expenditure being required by the tenant to make the building fit for purpose for their occupation.</p> <p>Planning applications where both a Vacant Building Credit claim, and a development viability assessment to support lower than a policy level of affordable housing are submitted, will need to ensure the Credit claim is appropriately treated in the development viability assessment.'</p>
MM3 5	50	Policy DMP 16 – Resisting Housing Loss	<p>Amend criteria b and c in Policy DMP 16 as follows:</p> <p>b. de-conversion of flats would create a family size home (3 bed or more) resulting in the net loss of no more than one dwelling of 2 bedrooms or less;</p> <p>c. providing social or physical infrastructure is provided to meet an identified local need;</p> <p>Insert new criteria d in Policy DMP 16 as follows:</p> <p>d. the proposed loss of housing would radically improve the neighbourhood.</p>
MM3 6	50	10.23	<p>Amend paragraph 10.23 as follows:</p> <p>'As identified in the SHMA and as a priority provision in Brent Core Strategy Policy CP 2 provision of family accommodation (3 bed or more dwellings) to meet Brent's needs is a priority. Consequently, the de-conversion of flats into a family size dwelling will be supported where it results in the net loss of no more</p>

Ref	Page	Policy/ Paragraph	Main Modification
			than one dwelling of 2 bedrooms or less.'
MM3 7	51	10.28	<p>Amend paragraph 10.28 as follows:</p> <p>'The policy seeks to allow for efficient use of existing housing stock through the conversion of existing larger dwellings to assist in meeting housing targets. However, it also seeks to ensure continued provision of family sized housing (3 bedroom or more), houses or flats, suitable for occupation by families to meet Brent's housing needs. Consequently where larger properties are suitable for conversion, schemes should include at least a 3-bed or more dwelling suitable for at least 4 people. Ideally the family sized accommodation will This will normally be at ground floor (if there is no access to a lift) to provide for ease of entry and also have direct access to associated amenity space. to maintain the quality and accessibility of existing family housing. In larger properties consideration should be given to the provision of 4-bed units for at least 5 people. Individual solutions, including modest extensions, may be appropriate to accommodate the required family size units dwellings. Effort should be made to provide all additional flats with amenity space.'</p>
MM3 8	51	Policy DMP 17 – Conversion of Family Sized Dwellings	<p>Amend Policy DMP 17 as follows:</p> <p>'To maintain family size housing conversion of a family sized home (3 bedrooms or more) to two or more other dwellings will only be allowed where the following criteria are met:</p> <ol style="list-style-type: none"> the existing home is 130 sq.m. or more and it results in at least a 3-bedroom dwelling, preferably with direct access to a garden/amenity space. <p>Exceptions to this will only be allowed where the amenity of the existing family sized home is so deficient that family occupation is unlikely and it could not reasonably be changed to overcome such deficiencies.'</p>
MM3 9	52	Policy DMP 18 – Dwelling Size and Residential Outbuildings	<p>Amend Policy DMP 18 as follows:</p> <p>'The size of dwellings should be consistent with London Plan Policy 3.5 Table 3.3 Minimum Space Standards for New Development Dwellings.</p> <p>In order to prevent the potential for overcrowding planning permission will only be granted where dwellings intended for occupation by one person is internally laid out as studio accommodation.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			Planning permission will only be granted for outbuildings that will not be residential accommodation or do not support the increased occupation of a dwelling.'
MM4 0	52	10.32	Amend paragraph 10.32 as follows: 'The policy seeks to reduce the potential for overcrowding of residential properties to be controlled through means available through the planning process. In particular it clarifies the standard for one person dwellings and seeks to reduce the potential addition or use of outbuildings to increase the capacity of a dwelling's occupation.'
MM4 1	52	10.34	Delete paragraph 10.34 as follows: ' The policy identifies that the provision of smaller dwellings will only be acceptable where it makes good use of space when a two person dwelling cannot be accommodated. A property designed as a one person one bed home through the provision of a separate bedroom provides a greater opportunity for over-occupation. Its layout as a studio reduces this potential. It gives an indication to occupiers (including potential renters) that the property has essentially been designed for occupation by one person. Consequently dwellings smaller than 50 sq.m. will be expected to be laid out as a studio.
MM4 2	53	10.37	Delete paragraph 10.37 as follows: ' For dwellings for occupation by one person, a drawing showing an internal layout as a studio'
MM4 3	54	Policy DMP 20 – Accommodat ion with Shared Facilities or Additional Support	Amend Policy DMP 20 as follows: 'Proposals for student accommodation , non-self contained or self-contained residential accommodation with shared facilities.....'
MM4 4	57	10.67	Insert additional sentence at the end of paragraph 10.67 as follows:

Ref	Page	Policy/ Paragraph	Main Modification
			'It also protects existing sites where there is currently such provision.'
MM4 5	59	Policy DMP 21 – Public Houses	<p>Amend the wording and order of Policy DMP 21 as follows:</p> <p>'The Council will only support the loss of public houses where:</p> <p>b a) its continued use as a pub or as an alternative community facility within the D1 use class is not economically viable as demonstrated by meeting the marketing requirements in paragraph 11.9;</p> <p>c b) the proposed alternative use will not detrimentally affect the character and vitality of the area and will retain as much of the building's defining external fabric and appearance as a pub as possible; and</p> <p>d c) the proposal does not constitute the loss of a service of particular value to the local community; and</p> <p>a- d) if registered as an Asset of Community Value the premises can be shown to have been offered for sale to local community groups and no credible offer has been received from such a group at a price that is reflective of the condition of the building and its future use as a public house. The Council will treat registration as an Asset of Community Value as a material planning consideration.'</p>
MM4 6	60	11.9	<p>Amend paragraph 11.9 as follows:</p> <p>'Where applications for a change of use or redevelopment of a public house are received, to make an assessment against criteria in Policy DMP 21, the Council will require evidence that:</p> <ul style="list-style-type: none"> • the public house has been marketed for 24 months as a public house and for an alternative local community facility, at a price agreed with the Council following an independent professional valuation (paid for by the developer) and there has been no interest in either the free-or lease-hold either as a public house or as a community facility falling within 'D1' use class; • the public house has been offered for sale locally, and in the region, in appropriate publications and through specialised licensed trade agents; • all reasonable efforts have been made to preserve the facility, including all diversification options

Ref	Page	Policy/ Paragraph	Main Modification
			<p>explored – and evidence supplied to illustrate this;</p> <ul style="list-style-type: none"> • the CAMRA Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes demonstrate that the public house is no longer economically viable; • there has been public consultation to ascertain the value of the public house to with the local community; • an assessment has been made of there are alternative licensed premises within easy walking distance of the public house; and any whether such alternative premises offer similar facilities and a similar community environment to the public house which is the subject of the application.'
MM4 7	61	Chapter 12 - Delivery and Monitoring	<p>Insert new monitoring indicators in table as follows:</p> <p>Performance Measure - Percentage of affordable housing within major development with an affordable housing planning obligation Target - 50% Specific policy to be monitored - DMP 15 Affordable Housing</p> <p>Performance Measure - Tenure split of affordable housing within major development with an affordable housing planning obligation Target - 70% social/affordable rent, 30% intermediate Specific Policy to be monitored - DMP 15 Affordable Housing</p> <p>Performance Measure - Number of public houses lost to development Target - No loss of viable public houses Specific policy to be monitored - DMP 21 Public Houses</p>