

Appendix 4. Modifications Proposed to the draft Brent Local Plan October 2019 to be submitted for consideration as part of the Examination

1. This schedule sets out proposed Main and Minor Modifications to the draft Brent Local Plan October 2019 that it is proposed will be submitted for consideration as part of the Examination process to address representations of soundness and other representations on the documents contents, plus other changes considered appropriate to improve the Plan.
2. The proposed Modifications are generally expressed in the form of ~~strike through~~ for deletions of text and underlined for additions of text and are set out in the same order as the Local Plan.

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

Main Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	Good Growth in Brent	Growing the Economy	"a) <u>As a 'provide capacity' borough in the London Plan,</u> make better use of Brent's employment <u>industrial land through a structured approach to deliver industrial</u> its <u>intensification and land release, where appropriate</u> and also where possible support additional housing/ community facilities through co-location".	Response to TfL commercial development representation on the need to recognise Brent's 'Provide Capacity' status.
MM	Good Growth in Brent	Creating a Healthy Borough	"e) <u>ensure that there is sufficient supply of indoor and outdoor sports provision to meet demand which will assist in increasing the levels of sports participation and physical activity within the Borough</u> "	Response to Sport England raising the need to include an overarching aim on sports provision.
MM	BP1	k)	"Intensification and higher residential densities will be supported around Wembley Park Station where it can be demonstrated development would take advantage of the area's good access to public transport."	Response to Quintain re: not appearing to restrict development to only in close proximity to the station.

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MM	BP1	j)	"Introducing a greater proportion of employment <u>industrial</u> floorspace in new mixed-use developments on Watkin Road and First Way to the east of the Stadium than previously allocated in the Wembley Area Action Plan"	To be consistent with London Plan policy.
MM	Central/ South West	BCSA1 – 19, BSWA8 – 12 & 17.	Site allocation policies (BCSA1-19 and BSWA8-12 and BSWA17) planning considerations to be amended: " <u>The site is located within the Wembley Opportunity Area and as such London Plan policies on Opportunity Areas are applicable.</u> "	Provide clarity on Wembley Opportunity Area for associated London Plan policies as sought by GLA.
MM	BCSA1	Planning Considerations	"....will seek no net loss of employment <u>industrial</u> floorspace....."	To be consistent with London Plan policy.
MM	BCSA1	Design Considerations	"....to take account of the setting of the opposite Grade 2 Listed former Town Hall, <u>Barn Hill conservation area</u> and not....."	To reflect designated heritage assets as identified by Historic England.
MM	BCSA1	Infrastructure Requirements	"Waste water facilities enhancement <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Reflective of advice that Thames Water provided in relation to water infrastructure.
MM	BCSA2	Planning Considerations	"....The Fountain Studios is a cultural facility, which in the context of Wembley's identification in the London Plan as a Cultural Area of strategic importance, Brent's London Borough of Culture 2020 status and the desire to support the evening economy would ideally be replaced with another cultural facility....."	Remove requirement taking account of decision by planning committee to mind to approve an application with no replacement provision as identified by Quintain.
MM	BCSA2	Infrastructure requirements	<u>"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will</u>	Reflective of advice that Thames Water provided in

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			<u>need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	relation to water infrastructure.
MM	BCSA3	Planning Considerations	" Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Relocated to Infrastructure requirements for consistency.
MM	BCSA3	Infrastructure requirements	" Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Relocated from planning considerations as more appropriate in this section.
MM	BCSA4	Indicative Capacity	"Up to 700 500 dwellings (residential and student accommodation). Employment industrial space and hotel space to be confirmed."	Reflect dwellings reduction due to increased industrial floorspace provision requirements.
MM	BCSA4	Timeframe for Delivery	0-5 years "200 450" 5-10 years "500 50"	Timescales amended to reflect delivery information provided by the site's owners.
MM	BCSA4	Planning Considerations	"....will seek no net loss of employment industrial floorspace....."	To be consistent with London Plan policy.
MM	BCSA4	Risks	"Existing employment industrial use of the site means that the policy context has changed from when the site was	To be consistent with London Plan policy.

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			allocated in the Wembley Area Action Plan. As such re-provision of employment industrial space "	
MM	BCSA4	Planning Considerations	"A critical trunk sewer runs through this site which would need to be considered Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Reflects information provided by Thames Water and relocation of remainder to Infrastructure requirements.
MM	BCSA4	Infrastructure requirements	" Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Relocated from planning considerations as more appropriate in this section.
MM	BCSA5	Planning Considerations	"...potential CNWL/further/higher education campus. Its town centre location also makes it suitable for office-led mixed-use development."	Response to representation from GLA that identified office development as appropriate.
MM	BCSA5	Planning Considerations	"A critical trunk sewer runs through this site which would need to be considered Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to	Reflects information provided by Thames Water and relocation of remainder to Infrastructure requirements.

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			the development creating identified additional capacity requirements."	
MM	BCSA5	Infrastructure requirements	" <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Relocated from planning considerations as more appropriate in this section.
MM	BCSA6	Indicative Capacity	" Assumed 4000 <u>838</u> dwellings on basis of density of existing permissions prior to more detailed assessment, plus employment <u>industrial</u> floorspace at ground floor."	Align terminology with London Plan and reduction due to methodology of counting student scheme.
MM	BCSA6	Timeframe for delivery	"0-5 years 500 <u>342</u> , 5-10 years 350, 10+ years 450 <u>138</u> "	Reflection of amendment of methodology of converting student scheme to dwellings.
MM	BCSA6	Planning Considerations	"....loss of existing employment <u>industrial</u> land was considered appropriate in the WAAP, Brent's London Plan 'provide capacity' status for employment <u>industrial</u> means that employment <u>industrial</u> floorspace at least on the ground floor of 0.65 plot ratio...."	Align terminology with London Plan.
MM	BCSA6	Planning Considerations	"..Development in proximity to the <u>north-eastern</u> part of the site (<u>adjacent to Wembley Business Park</u>) must adopt the 'agent of change'..."	Provides more clarity on the location of agent of change principle being a significant consideration.
MM	BCSA6	Planning Considerations	"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a	Relocation to Infrastructure requirements.

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			housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	
MM	BCSA6	Infrastructure requirements	" <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Relocated from planning considerations as more appropriate in this section.
MM	BCSA7	Allocated Use	"Mixed-use residential-led development to include replacement of the existing office space <u>TfL ancillary accommodation</u> "	To reflect need to address TfL needs, rather than requiring general office provision.
MM	BCSA7	Time Frame for Delivery	0-5 Years " 450 375 " 5-10 years " 250 100 "	Better reflects number of dwellings and their timing of delivery.
MM	BCSA7	Planning Considerations	" <u>The development should not compromise the ability to add potential platforms at Wembley Park station on the Chiltern Line Aylesbury Branch.</u> "	Need to reflect potential within the existing line to provide additional platforms.
MM	BCSA7	Planning Considerations	"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Relocation to Infrastructure requirements.
MM	BCSA7	Design Principles	"Buildings may step up to four or five storeys heights should mediate between the taller buildings on Matthews Close and the character of development along Forty Avenue and	Reduce prescription to provide for justified

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			further to the north, however the northern site is not suitable for tall buildings of a significant scale."	solution at time of planning application.
MM	BCSA7	Infrastructure requirements	" <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Relocated from planning considerations as more appropriate in this section.
MM	BCSA8	Planning Considerations	"remaining employment <u>industrial</u> floorspace."	Consistency with London Plan.
MM	BCSA8	Planning Considerations	"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Relocation to Infrastructure requirements.
MM	BCSA8	Infrastructure requirements	" <u>Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Relocated from planning considerations as more appropriate in this section.
MM	BCSA9	Allocated Use	"Residential-led mixed-use development, including student accommodation/education and business <u>industrial</u> ."	Align terminology with London Plan.

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MM	BCSA9	Indicative capacity	"1200 <u>1262</u> "	Reflects updated understanding of potential delivery
MM	BCSA9	Time Frame for Delivery	0-5 Years " <u>269</u> " 5-10 years " <u>557</u> " 10+ years " <u>436</u> "	Inserts missing information based on trajectory.
MM	BCSA9	Planning Considerations	.. "It still contains numerous occupied business industrial premises....." and " ...maximum re-provision of business industrial uses..... "	Align terminology with London Plan.
MM	BCSA9	Planning considerations	<u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u>	Reflects protected waste site need for re-provision.
MM	BCSA9	Planning Considerations	"Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Relocation to Infrastructure requirements.
MM	BCSA9	Design Principles	"...Where business industrial premises are being provided on-site, the design should support the amenity of both residential and business industrial uses..."	To provide clarity and consistency with London Plan definitions.
MM	BCSA9	Infrastructure requirements	<u>" Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Relocated from planning considerations as more appropriate in this section.
MM	BCSA9	Justification	"..potentially accommodate business industrial premises...."	Align terminology with London Plan.

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MM	BCSA10	Planning Considerations	“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”	Relocated to Infrastructure requirements.
MM	BCSA10	Infrastructure requirements	<u>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Relocated from planning considerations as more appropriate in this section.
MM	BCSA11	Infrastructure requirements	<u>“Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Reflects advice received from Thames Water.
MM	BCSA12	Planning Considerations	“means that no-net loss of <u>employment industrial</u> floorspace”	Consistency with London Plan.
MM	BCSA12	Planning Considerations	“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”	Relocated to Infrastructure requirements.

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MM	BCSA12	Infrastructure requirements	<u>“ Waste water facilities enhancement Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>	Relocated from planning considerations as more appropriate in this section.
MM	BCSA12	Justification	“..re-providing employment <u>industrial</u> space...”	Consistency with London Plan.
MM	BCSA17	All	Southway Motors/Fourway Supplies/ Midnight Motors, South Way, HA9 0HB, 0.33, Repair garages and storage, Business and residential, 60, Re-provision of business floorspace at 0.65 plot ratio required. Ground floor active frontage along South Way.	Removed as conflict with SIL designation where only intensification is allowed.
MM	BCSA19	Site Area	"0.34"	Measurement provided by TfL commercial development.
MM	BP2	e)	“...taking account of the need to support additional employment <u>industrial</u> space on site...”	To be consistent with the London Plan.
MM	BP2	k)	"Securing sufficient physical and social Infrastructure on and off site to support the <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at Staples Corner and Neasden Stations' Growth Areas, in particular and</u> ensuring the improvement of the Welsh Harp and its setting.	More clarity on range of infrastructure in response to CCG.
MM	BP2	m)	"Retaining and encouraging intensification of employment B1c, B2 and B8 industrial uses at Kingsbury Locally Significant Industrial Site.	Alignment with the London Plan.

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MM	BEGA1	Allocated use	"Growth Area - Strategic Industrial Location and Locally Significant Industrial Sites subject...."	Amend to reflect new designation status with regards to SIL.
MM	BEGA1	Description of site	"The site comprises Strategic Industrial Location and Locally Significant Industrial Sites"	Amend to reflect new designation status with regards to SIL.
MM	BEGA1	Planning Considerations:	"A significant part of the site is Strategic Industrial Land/ Locally Significant Industrial Site" and "0.65 for the current SIL and LSIS sites useable employment <u>industrial</u> floorspace....."	Amend to reflect new designation status with regards to SIL and reference industrial to be consistent with the London Plan.
MM	BEGA1	Planning considerations:	<u>"The masterplanning exercise will be undertaken involving key stakeholders, landowners and developers to help shape its content from conception to completion."</u>	Reference need to include all stakeholders in masterplanning process.
MM	BEGA1	Planning Considerations:	"Apart from the railway corridors <u>which are Sites of Importance for Nature Conservation (SINC)</u> , there is very little of ecological value...."	Identifies SINC status of part of the site.
MM	BEGA1	Planning Considerations:	<u>"The presence of an existing active rail aggregate depot to the west plus matters such as the proximity to operational railways and the need to re-provide industrial uses on site needs to be considered to ensure future development proposals do not place unreasonable restrictions on non-residential uses whilst creating a high quality residential environment."</u>	Further consideration of the need to not undermine an adjacent site's function.
MM	BEGA1	Planning considerations:	<u>"Development around the existing or proposed rail stations and close to infrastructure should take account of operational requirements and the potential need to provide mitigation for any impacts."</u>	To ensure development better considers rail operation as sought by TfL spatial planning.

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MM	BEGA1	Planning considerations:	" <u>Masterplanning should consider the potential for a future bus/cycle/pedestrian link between Neasden Lane and Great Central Way and if possible allow sufficient space within layout to allow this longer term aspiration to be delivered.</u> "	To ensure development better considers potential for future links as sought by TfL spatial planning.
MM	BEGA1	Planning considerations	<u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u>	Reflects protected waste site need for re-provision.
MM	BEGA1	Infrastructure requirements:	" <u>Neasden station has a constrained ticket hall and stairways. TfL has identified that there may be a need to consider station improvements to accommodate development related demand, with associated financial contributions.</u> "	To ensure development better considers limited capacity of station operation currently as sought by TfL spatial planning.
MM	BEGA1	Infrastructure requirements:	"...space for proposed public transport improvements including the West London Orbital line and station <u>with potential for platforms for up to 8 car-trains...</u> "	To not potentially compromise flexibility for extension of platforms in the future.
MM	BEGA1	Risks:	"...existing housing sites or employment <u>industrial</u> sites..."	Consistency with the London Plan.
MM	BEGA1	Design Principles:	"...the area to prosper as an employment <u>industrial</u> location..."	Consistency with the London Plan.
MM	BEGA1	Justification:	"...low intensity used Strategic Industrial Land and Locally Significant Industrial Sites..."	Reflect LSIS status of industrial sites as shown on policies map.
MM	BEGA1	Justification:	"...Given Brent's status as a 'provide capacity' borough for employment <u>industrial</u> space in the London Plan, the SIL and LSIS also provide a vital role in meeting future employment <u>industrial</u> needs..."	Reflect London Plan policy and LSIS status of industrial sites as shown on policies map.

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MM	BEGA2	Planning considerations	“...ideally increase useable employment <u>industrial</u> floorspace (predominantly light industrial, industrial and storage and distribution) representing a 0.65 plot ratio or replacement of the existing amount of employment <u>industrial</u> floorspace...” “..adjacent employment <u>industrial</u> uses will...”	Provide consistency with London Plan terminology.
MM	BEGA2	Planning considerations	“...Brent Cross West Thameslink station will open in 2024 <u>2022</u> ...”	Clarification of station opening timescales following funding provision.
MM	BEGA2	Planning considerations	"....Open Space, <u>Brent Reservoir Site of Special Scientific Interest, Site of.....</u> " "...breeding wetland birds. <u>Natural England have also identified, given the ecological status of the area, the need to protect the SSSI particularly with regards to potential disturbance from visitor recreational activities.</u> "	Increase emphasis on SSSI as requested by Natural England.
MM	BEGA2	Planning Considerations:	" <u>The Council together with TfL will consider the extent to which the area can support car-free development and mitigate impacts through suitable improvements to public transport, active travel and measures to not adversely impact on neighbours' amenity of any potential parking displacement. There is a need to work with TfL and Barnet Council to provide improved links from the site to the proposed new station and wider Brent Cross regeneration area.</u> "	Further reduce car use and ensure residents are not adversely impacted in response to TfL spatial planning.
MM	BEGA2	Design principles	“...prosper as an employment <u>industrial</u> location.”	Provide consistency with London Plan terminology.
MM	BEGA2	Justification	“...vital role in meeting future employment <u>industrial</u> needs...”	Provide consistency with London Plan terminology.
MM	BESA1	Allocated Use	"...replacement of the existing B1(c), B2 and B8 floorspace <u>uses</u> and on the McDonalds site A1-A5 and/or B1(c), B2	Bring into alignment with London Plan.

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			<u>and</u> B8 employment uses...”	
MM	BESA1	Indicative Capacity:	"... 3886 5647 sqm B1-B8 on the existing employment <u>industrial</u> sites (0.65 plot ratio) and 400 sqm A1-A5 uses/B1(c), B2 <u>and</u> B8 on the McDonalds...”	Bring into alignment with London Plan.
MM	BESA1	Justification	“...ensure continued provision of employment <u>industrial</u> space, so will seek its retention of employment <u>these</u> uses on site.”	Bring into alignment with London Plan.
MM	BESA2	Indicative capacity:	“10,000 sqm Sui Generis <u>based</u> on the existing employment <u>industrial</u> site’s floorspace required to replace bus depot/ create suitable residential environment above, plus 202 dwellings.”	Reflects known ownership details.
MM	BESA2	Ownership:	“ Public and Private Sector”	Reflects known ownership details.
MM	BESA2	Planning considerations	“ Any proposal must ensure the replacement of the bus depot or, An operational bus garage of equivalent capacity <u>needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.</u> ” if-If operationally this is.....”	To address bus infrastructure needs as sought by TfL Spatial Planning.
MM	BESA2	Planning considerations	“...appropriate if the minimum employment <u>industrial</u> floorspace is provided.....”	To be consistent with London Plan.
MM	BESA2	Justification	“...The council needs to ensure continued provision of employment space, so will seek the retention of the bus depot or replacement employment <u>industrial</u> space on this site.....”	To be consistent with London Plan.
MM	BP3	d)	"...taking into account the need to intensify employment <u>industrial</u> use on the site."	To be consistent with London Plan.

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MM	BP3	s)	"...Supporting new and improved employment <u>industrial</u> premises."	To be consistent with London Plan.
MM	BP3	m)	"m) <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at</u> Secure sufficient physical and social infrastructure on and off site to support an increase in population at Burnt Oak and Colindale"	More clarity on social infrastructure to be provided in response to Brent CCG.
MM	BNGA1		"...The existing Locally Significant Industrial Sites will be subject to masterplanning with a view to its regeneration to re-provide updated employment industrial floorspace that meets employers existing and future needs, through co-location with other uses....."	Consistency with the London Plan.
MM	BNSA1	Allocated Use	"Mixed-use development comprising areas of employment industrial intensification and..."	Consistency with the London Plan.
MM	BNSA1	Existing use	" Transitioning mixed use and a Locally significant industrial site containing a range of uses..."	Clarify existing uses wider than industrial.
MM	BNSA1	Time scale	"0-5 years 44 <u>414</u> "	Typo - delivery to reflect planning permission.
MM	BNSA1	Indicative Capacity	A future masterplanning process <u>involving site owners/occupiers and other stakeholders</u> will provide clarity...."	Clarification of engagement as part of the masterplan.
MM	BNSA1	Description of the site	"...Located to the <u>east of the LSIS within the site allocation</u> is a car dealership and associated <u>servicing workshops</u> , parking/ storage land. A petrol station forms the north eastern <u>western</u> corner."	Reflects wider range of uses on site and accuracy update.
MM	BNSA1	Planning considerations	".....impact assessment. <u>Similarly the retention of a retail car dealership function on the Mercedes site is also considered appropriate if required as part of an intensification of floorspace and provision of other allocated uses on that site.</u> "	To provide clarity on the car dealership.

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MM	BNSA1	Planning considerations	"....Locally Significant Industrial Site. <u>The Council considers it appropriate for co-location which will be delivered consistent with London Plan policy E7.</u> The whole...."	Clarify co-location status consistent with London Plan policy.
MM	BNSA1	Planning considerations	"....how it can increase useable employment <u>industrial</u> floorspace..."	Clarify for consistency with London Plan policy.
MM	BNSA1	Design Principles	"...enhance its <u>industrial</u> /employment function...."	Clarify for consistency with London Plan policy.
MM	BNSA1	Design Principles	"...Access to the site to be considered carefully to ensure no conflict is created between different users <u>and the potential for north-south and east-west pedestrian and cycle connections in particular between Stag Lane and Edgware Road to be enhanced in number and quality....</u> "	Identify increased connectivity principles.
MM	BNSA1	Policy Justification	".....Furthermore, the intensification/ colocation of the LSIS <u>and Capitol Way Valley with the Burnt Oak and Colindale Growth Area</u> will contribute to meeting the 'provide capacity' status given to Brent within the London Plan. Currently, although the vacancy rates are low, the site is not intensively used and contains a number of two storey buildings that vary in condition. The LSIS Capitol Way Valley also has good access to services and amenities which will support intensification/ co-location."	Consistency with London Plan policy and factual update on access for the allocation.
MM	BNSA2	Allocated use	"Mixed use development to include residential, retail and employment <u>replacement industrial and office space/affordable workspace.</u> "	Consistency with London Plan and BE2 and BE3.
MM	BNSA2	Description of Existing Site	"Forming the southern part of the site is a car dealership, <u>servicing centre/workshop</u> and associated car parking."	To identify that the site has some industrial use provision of which will need to be reconsidered to

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				be consistent with the London Plan.
MM	BNSA2	PTAL rating	The PTAL rating of the site varies from 2-3 4 . The majority of the northern and southern part is within PTAL rating 2, with the central part achieving PTAL rating 3-4.	To reflect PTAL scores as identified through representation received.
MM	BNSA2	Planning considerations	<u>"The site contains some existing Local Employment Sites in the form of industrial floorspace related to the servicing of vehicles as part of the car dealership and the office provision of Southon House. Consistent with the borough's provide capacity status in the London Plan the industrial floorspace should be replaced in line with London Plan policy E7. The office space will be subject to Brent policy BE3. As it is out of centre, the site is not a priority location for retail in terms of the sequential test. Nevertheless, the Council is aware that the retail element appears to be trading well, so is likely (subject to other London Plan and Local Plan retail policies) be receptive to re-provision of some retail if it is necessary from a viability perspective to encourage the site's more intensive development that makes for a more efficient use of land."</u>	Clarification of the approach in relation to the existing uses on site.
MM	BNSA2	Planning considerations	BNSA2 Planning considerations: "Development at this site should avoid having any detrimental impact on the setting of this building."	To reflect the limited weight to be attached to the non-designated heritage asset status of the school.
MM	BNSA2	Risks	<u>"access to be reconsidered. This may increase costs affecting viability or slow down delivery."</u>	To clarify why access arrangements may be a risk.
MM	BNSA3	Planning considerations	"...No permissions for non-employment industrial uses within the LSIS will be allowed...." "...Noise associated with the continued industrial use, or intensification of employment industrial uses on site...."	Consistency with the London Plan.

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MM	BNSA3	Planning considerations	<u>"Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Reflects need to better consider the impact of the railway as sought by TfL spatial planning.
MM	BNSA3	Design considerations	"LSIS sites to ensure the area continues to prosper as an employment <u>industrial</u> location."	Consistency with the London Plan.
MM	BNSA3	Justification	"...the proposed intensification and co-location at these sites will contribute towards meeting future employment <u>industrial</u> needs...."	Consistency with the London Plan.
MM	BNSA4	Infrastructure Requirements	<u>"Thames Water will need to be engaged at the earliest opportunity to agree an infrastructure phasing plan to ensure essential water infrastructure is delivered prior to being required to meet additional demands created through the development."</u>	Additional infrastructure requirement as identified by Thames Water.
MM	BP4	After i)	<u>" Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities, notably at As part of the development within the Northwick Park Growth Area where the following improvements to community and cultural facilities should be achieved:"</u>	More clarity on social infrastructure to be provided in response to Brent CCG.
MM	BP4	h)	"Protecting and enhancing playing pitch <u>field</u> provision at....."	Align terminology with national policy as sought by Sport England.
MM	BP4	h)	"....Claremont High School, <u>John Billam Playing Fields</u> and Tenterden Sports Ground"	Reflects local importance of facilities.
MM	BNWGA1	Ownership	<u>"Transport for London own Northwick Park station and adjacent railway land."</u>	Land ownership identified by TfL Spatial Planning.

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MM	BNWGA1	Planning Considerations:	"...A ball strike assessment will be required <u>and any necessary ball stop mitigation implemented prior to the development's impact</u> to ensure that new development does not compromise the role of the MOL in terms of sports provision....."	Strengthen requirement as requested by Sport England
MM	BNWSA1	Ownership	BNWSA1 Ownership amend: " Private and small part public ownership "	Status of confirmed ownership.
MM	BNWSA1	Planning considerations	" <u>If parking is provided it should be made publically available and be designed to serve the wider town centre.</u> "	Clarification sought by TfL spatial planning.
MM	BNWSA1	Planning considerations	" <u>Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts.</u> "	Clarification sought by TfL spatial planning.
MM	BP5	j)	"Co-location of employment <u>industrial</u> and residential uses at Church End Locally Significant Industrial Sites, subject to the requirements in policy BE2."	Consistency with the London Plan.
MM	BP5	k)	"Retaining and encouraging intensification of employment <u>industrial</u> and residential uses at Brentfield Locally Significant Industrial Site."	Consistency with the London Plan.
MM	BP5	Before m)	" <u>mi) Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities</u> "	Reflect wider range of social infrastructure as sought by CCG.
MM	BSGA1		"..The redevelopment of industrial sites for co-location will secure investment in new employment <u>industrial</u> floorspace and improve environmental quality...."	Consistency with the London Plan.
MM	BSSA1	Allocation	"Mixed-use residential, employment <u>industrial</u> and supporting community facilities"	Reflects better understanding of potential

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				capacity and prior approval.
MM	BSSA1	Indicative Capacity	" 380 <u>414</u> "	Reflects better understanding of potential capacity and prior approval.
MM	BSSA1	Delivery timeline	0-5 years " <u>34</u> " 6-10 years " <u>24 120</u> " 10+ years " 380 <u>260</u> "	Reflects minded to approve scheme.
MM	BSSA1	Planning Considerations	"...It will be subject to a masterplan-led approach, demonstrating comprehensive development will result in a net increase in employment <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM	BSSA1	Justification	"...to provide increased employment <u>industrial</u> capacity, mixed-use development will be subject to a net increase in employment <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM	BSSA2	Allocated use	"Housing, employment <u>industrial</u> and supporting community facilities"	Consistency with the London Plan.
MM	BSSA2	Planning considerations	"..This will demonstrate comprehensive development <u>and</u> will result in a net increase in employment <u>industrial</u> floorspace...."	Consistency with the London Plan.
MM	BSSA2	Justification	"...to provide increased employment <u>industrial</u> capacity, mixed-use development will be subject to a net increase in employment <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM	BSSA4	Allocated use	"Mixed-use housing, employment <u>industrial</u> and supporting community facilities"	Consistency with the London Plan.
MM	BSSA4	Indicative capacity	" 200 <u>300</u> "	Reconsideration of potential capacity.

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MM	BSSA4	Timeframe for delivery	5-10 years " <u>200</u> " 10+ years " 200 <u>100</u> ".	Reflects capacity changes and timing.
MM	BSSA4	Planning considerations	"..in a net increase in employment <u>industrial</u> floorspace...."	Consistency with the London Plan.
MM	BSSA4	Justification	"...to provide increased employment <u>industrial</u> capacity, mixed-use development will be subject to a net increase in employment <u>industrial</u> floorspace..."	Consistency with the London Plan.
MM	BSSA5	Ownership	Amend to: " Public/Private "	Factual update.
MM	BSSA5	Planning considerations	" <u>An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.</u> "	Clarification sought by TfL spatial planning.
MM	BSSA5	Infrastructure requirements	"... <u>Thames Water have indicated that currently there are no significant concerns with regards to water supply or waste water capacity for this site. Nevertheless, liaison is encouraged with Thames Water prior to any application to identify whether any upgrades are required as a result of development.</u> "	In response to Thames Water.
MM	BSSA6	Timeline for delivery	"0-5 years 440 <u>569</u> , 5-10 Years 100 "	Reflects delivery of existing development proposals.
MM	BSSA6	Allocated use	"Residential, <u>with potential for</u> affordable workspace, supporting community and cultural uses and small scale retail"	Takes account of uncertainty of extent of delivery on site due to flood zone location.
MM	BSSA6	Planning considerations	"The site <u>was until recently predominantly in employment use contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit.</u> The London Plan identifies Brent as a 'provide	Reflect policy requirement for additional industrial in the form of workspace to

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			capacity' borough in terms of industrial employment floorspace, and as <u>As such provision of some affordable workspace will be sought on site as part of the potential uses associated with a new mixed use community. an</u> increase in employment floorspace will be sought.	support the 'provide capacity' status.
MM	BSSA6	Planning considerations	"It has a poor public realm which needs to be improved, <u>subject to agreement being reached between the Council and landowners.</u> "	Reflects land for improvements might not be in the ownership of the developers.
MM	BSSA6	Planning considerations	<u>"The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought."</u>	Taking account of TfL spatial planning on station capacity.
MM	BSSA6	Planning considerations	"...Car free development will be encouraged, subject to a Controlled Parking Zone being achieved <u>achievable</u> ..."	Reflects flexibility recognising that the development may be occupied before a CPZ is delivered.
MM	BSSA7	Planning considerations	<u>"The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought."</u>	Taking account of TfL spatial planning on station capacity.
MM	BSSA7	Planning considerations	"...Car free development will be encouraged, subject to a Controlled Parking Zone being achieved <u>achievable</u> ..."	Reflects flexibility recognising that the development may be occupied before a CPZ is delivered.
MM	BSSA7	Design principles	<u>"...The site has been identified as part of a Tall Buildings Zone.</u> In this context higher density development is appropriate and it is considered that this area is suitable for	Provide clarity with regards to tall buildings on site.

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			tall buildings, subject to being of high architectural quality, and providing a high standard of amenity <u>and respecting local character</u> "	
MM	BSSA8		Allocated use "Residential and employment <u>industrial</u> " Comments "Consistent with policy BE3 an increase in employment <u>industrial</u> floorspace will be sought as part of any redevelopment."	Consistency with the London Plan.
MM	BSSA9		Comments "Consistent with policy BE3 an increase in employment <u>industrial</u> floorspace will be sought as part of any redevelopment....".	Consistency with the London Plan.
MM	BSSA13	Indicative Homes	" 45 <u>26</u> "	Reflects minded to approve scheme.
MM	BP6	l)	" <u>Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health, cultural and community facilities notably</u> Securing infrastructure in South Kilburn to include a new community space, 3 form of entry primary school and nursery and other community uses. "	Reflect wider range of social infrastructure as sought by CCG.
MM	BP6	m)	"Enhance and protect playing <u>fields</u> pitches at Gladstone Park and..."	National definition consistency sought by Sport England.
MM	BP6	q)	"The conversion of vehicle repair premises on Hassop Road to employment <u>industrial</u> uses which improve amenity for neighbouring residential units will be supported..."	Consistency with London Plan.
MM	BSESA5	Indicative capacity	" 120 <u>-50 net (121 gross)</u> "	Reflects capacity taking account of demolition.
MM	BSESA5	Timeline for delivery	0-5 years " 20 <u>-121</u> " 6-10 years " 400 <u>71</u> "	Reflects capacity taking account of demolition.

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MM	BSESA8	Indicative capacity	"202 <u>96 net (250 gross)</u> "	Reflects capacity taking account of demolition.
MM	BSESA8	Timeline for delivery	0-5 years " 202 <u>96</u> "	Reflects capacity taking account of demolition.
MM	BSESA11	Indicative capacity	" 40 <u>20</u> "	More work done on site capacity.
MM	BSESA11	Timeline for delivery	0-5 years " 40 <u>20</u> "	More work done on site capacity.
MM	BSESA12	Indicative capacity	" Unknown <u>-40 net</u> "	Reflects capacity taking account of demolition.
MM	BSESA12	Timeline for delivery	0-5 years " -40 "	Reflects capacity taking account of demolition.
MM	BSESA12	Infrastructure requirements	"Thames Water will need to be engaged to establish impact on water supply network and water treatment infrastructure at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered ahead of development prior to the development creating identified additional capacity requirements... "	Advice from Thames Water.
MM	BSESA16	Infrastructure requirements	" ..Thames Water has indicated the scale of development could require upgrades to water supply capacity and is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. "	Advice from Thames Water.
MM	BSESA18	Planning considerations	"Policy B6 (p-g) promotes the conversion of premises on Hassop Road to employment <u>industrial</u> uses which improve amenity for neighbouring residential units <u>properties</u> ." "...as such, an increase in employment <u>industrial</u> floorspace will be required..."	Consistency between Local Plan policies and also London Plan.

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MM	BSESA18	Infrastructure requirements	" <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Advice from Thames Water.
MM	BSESA18	Justification	"...As such, an increase in employment <u>industrial</u> floorspace will be sought..."	Consistency with London Plan.
MM	BSESA21	Existing use	"Supermarket, car parking and an employment <u>industrial</u> use"	Consistency with London Plan.
MM	BSESA21	Allocated use	"Mixed-use including housing, retail and employment <u>industrial</u> uses"	Consistency with London Plan.
MM	BSESA21	Planning considerations	"...An increase in employment <u>industrial</u> floorspace will be required as part of any redevelopment...."	Consistency with London Plan.
MM	BSESA21	Justification	"...The site contains an existing employment <u>industrial</u> use. The draft London Plan requires Brent to provide additional employment <u>industrial</u> floorspace capacity. As such an increase in employment <u>industrial</u> floorspace will be sought. Retention of employment <u>industrial</u> floorspace in this location..."	Consistency with London Plan.
MM	BSESA22		Indicative homes " 20 42 " Comments " 17/0322 pending decision <u>mind to approve</u> "	To reflect planning decision.
MM	BSESA25		Indicative homes " 50 70 " Comments " 17/5291 allowed at appeal "	To reflect planning permission.

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MM	BSESA28		Allocated use: Mixed-use employment <u>industrial</u> and residential	To reflect planning permission.
MM	BSESA34	Indicative homes	" Unknown <u>20</u> "	Estimate of capacity based on size and context.
MM	BSESA35		Allocated use: " Residential and employment in the b use class <u>industrial</u> Comments: "An uplift in employment <u>industrial</u> floorspace will be required as part of any redevelopment."	Consistency with the London Plan.
MM	BP7	b)	"Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focussing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton and in intensification corridors. <u>and</u> In the intensification corridors of A404 Harrow Road and A4005 Bridgewater Road/ Ealing Road, A4089 Ealing Road, A404 Watford Road buildings where around 15 metres (5-storeys) could be appropriate and in Sudbury and Ealing Road town centres where buildings around 15-18 metres (5-6 storeys) could be appropriate."	Clarification in relation to St George representation.
MM	BP7	j)	"Introducing mixed-use development to employment <u>industrial</u> sites around the junction of Ealing Road and Bridgewater Road..."	Consistency with the London Plan.
MM	BSWGA1		"The area will be a location for taller buildings at its Ealing Road and Northfields ends, with principally mid-rise in between."	Increase emphasis.
MM	BSWSA1	Planning considerations	"there must be at a minimum replacement of the existing amount of employment <u>industrial</u> floorspace or 0.65 plot ratio, whichever is the greater across the sites. The configuration of employment <u>industrial</u> floorspace will be agreed as part of the forthcoming masterplan process..."	Consistency with the London Plan.
MM	BSWSA1	Planning considerations	" <u>An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that</u>	Taking account of TfL spatial planning position.

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			<u>it is no longer operationally required, or a suitable replacement can be provided elsewhere. Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts. Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	
MM	BSWSA1	Planning considerations	"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Placed in Infrastructure Requirements for consistency.
MM	BSWSA1	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA1	Justification	"...as well as increasing provision of <u>employment industrial</u> floorspace in line with London Plan requirements...."	Consistency with the London Plan.
MM	BSWSA2	Planning considerations	<u>"The use of Glacier Way as a TfL bus stand will also need be taken into account. This must be retained or enhanced as part of any development and early discussion with TfL London Buses on this is should take place."</u>	Taking account of TfL spatial planning advice.

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MM	BSWSA2	Planning considerations	"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Placed in Infrastructure Requirements for consistency.
MM	BSWSA2	Infrastructure requirements	Amend policy to: <u>"No specific infrastructure requirements identified beyond Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	Taking account of TfL spatial planning advice.
MM	BSWSA2	Infrastructure requirements	"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Moved from planning considerations for consistency.
MM	BSWSA3	Planning considerations	<u>"Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Taking account of TfL spatial planning advice.
MM	BSWSA3	Planning considerations	"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Placed in Infrastructure Requirements for consistency.

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MM	BSWSA3	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	Taking account of TfL spatial planning advice.
MM	BSWSA3	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA4	Allocated use	"Mixed-use residential led development incorporating some replacement workspace <u>industrial</u> at ground floor level and potential commercial leisure use to take advantage of/ enhance the canal setting."	Consistency with the London Plan.
MM	BSWSA4	Planning considerations	"Given that the site is existing employment <u>industrial</u> land and Brent's status as a provide capacity borough, the council will require no net loss of employment <u>industrial</u> floorspace."	Consistency with the London Plan.
MM	BSWSA4	Planning considerations	"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Placed in Infrastructure Requirements for consistency.
MM	BSWSA4	Planning considerations	<u>The site includes a West London Waste Plan protected site. This should be accommodated in the redevelopment, or suitable capacity for the waste function provided elsewhere.</u>	Reflects protected waste site need for re-provision.

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MM	BSWSA4	Infrastructure requirements	" <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> "	TfL Spatial Planning advice.
MM	BSWSA4	Infrastructure requirements	" <u>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Moved from planning considerations for consistency.
MM	BSWSA4	Justification	"..The site's proximity to Alperton Station make it an excellent location for mixed residential and employment <u>industrial</u> use."	Consistency with the London Plan.
MM	BSWSA5	Allocated use	"Mixed-use residential led development incorporating some replacement employment <u>industrial</u> space, small scale retailing / commercial leisure and community use (e.g. nursery)"	Consistency with the London Plan.
MM	BSWSA5	Indicative Capacity	" 590 <u>490</u> "	Reduced due to need to provide more industrial space.
MM	BSWSA5	Timeline for delivery	0-5 years " 300 <u>50</u> " 6-10 years " 290 <u>400</u> " 10+ years " <u>50</u> "	Takes account of need to address different landownerships.
MM	BSWSA5	Planning considerations	"Given that the site is existing employment <u>industrial</u> land and Brent's status as a provide capacity borough, some re-provision of employment <u>industrial</u> floorspace..."	Consistency with the London Plan.

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MM	BSWSA5	Planning considerations	"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Placed in Infrastructure Requirements for consistency.
MM	BSWSA5	Planning considerations	<u>"...A Thames Water Sewage Pumping Station is located within the proposed development boundary and this is contrary to best practice set out in Sewers for Adoption (7th edition). The development should make suitable arrangements to address this matter satisfactorily and dependent on solutions devised, future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour, light, vibration and/or noise."</u>	Advice from Thames Water.
MM	BSWSA5	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA5	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area."</u>	Taking account of TfL spatial planning advice.

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MM	BSWSA6	Allocated Use	"Mixed-use residential-led development incorporating employment <u>industrial</u> uses."	Align terminology with London Plan.
MM	BSWSA6	Indicative Capacity	" 135 <u>147</u> "	Takes account of further capacity assessment work.
MM	BSWSA6	Delivery timeline	0-5 years " 135 <u>43</u> " 6-10 years " <u>104</u> "	Takes account of further capacity assessment and timing.
MM	BSWSA6	Planning considerations	"Given that the site is existing employment <u>industrial</u> land and Brent's status as a provide capacity borough, no net loss and re-provision of employment <u>industrial</u> floorspace...."	Consistency with London Plan.
MM	BSWSA6	Planning considerations	" Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. "	Placed in Infrastructure Requirements for consistency.
MM	BSWSA6	Infrastructure requirements	" <u>Contributions will be sought towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area.</u> "	Advice from TfL Spatial Planning.
MM	BSWSA6	Infrastructure requirements	" <u>Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u> "	Advice from Thames Water.
MM	BSWSA7	Existing Use	" <u>Mixed-use (Industrial with residential under construction)</u> "	Update in accordance with extant permission.

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MM	BSWSA7	Indicative Capacity	" 2900 <u>3,030 new homes</u> "	Update in accordance with extant permission.
MM	BSWSA7	Site Description	"The majority of the site (with the exception of a small area at the north-west) was part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan . The north-west part <u>was formerly</u> that is not SIL land is a non-designated Local Employment Site."	Update in accordance with extant permission.
MM	BSWSA7	Planning History	"Approved <u>hybrid planning permission application 18/0321</u> is a hybrid application <u>as amended by permission 19/2732</u> for the comprehensive mixed-use redevelopment of the <u>former Northfields Industrial Estate</u> . The scheme proposes demolition of all existing buildings on site and the delivery of a development including 2,900 <u>3030</u> homes..."	Update in accordance with extant permission.
MM	BSWSA7	Planning Considerations	Consistent with planning permission 18/0321 due to the site's historic SIL designation a minimum of 17,581 sq.m. of employment floorspace <u>of the typology and affordability associated with that planning permission</u> must be re-provided as part of the development. <u>Due to Brent's classification as a 'provide capacity' borough, should the opportunity arise, for example through co-location north of the river Brent or through intensification to the south, greater provision of industrial floorspace will be supported.</u>	The site through its planning permission 18/0321 consistent with Policy DMP14 was considered appropriate for release from SIL, on the basis that a minimum provision of employment space would be delivered as part of the development. The amended policy, together with BE2 and the policies map identifying SIL boundaries provides clarity that subject to a minimum amount of employment floorspace being re-

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				provided, the principle of the use of the site north of the river Brent for residential does not need to be re-tested against policies that would apply to SIL.
MM	BSWSA7	Planning considerations	"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Placed in Infrastructure Requirements for consistency.
MM	BSWSA7	Design Principles	"The scale and massing should be sympathetic to existing heights in the surrounding context with lower building heights closer to Beresford Avenue. <u>Tall buildings are appropriate on this site consistent with the heights parameters established by planning permission 18/0321 (as amended by application 19/2732).</u>"	Update in accordance with extant permission.
MM	BSWSA7	Infrastructure requirements	<u>"Contributions to improve the bus network, Stonebridge Park station and surrounding walking/cycling routes to mitigate the impact of the development on the surrounding movement network."</u>	Advice from TfL Spatial Planning.
MM	BSWSA7	Infrastructure requirements	<u>"Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency with other policies.
MM	BSWSA7	Justification.	BSWSA7 justification amend: "... 2900 <u>3030</u> homes...."	Update in accordance with extant permission.

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			"....employment industrial..."	
MM	BSWSA8	Planning considerations	<u>"Development close to rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts."</u>	Advice from TfL Spatial Planning
MM	BSWSA8	Planning considerations	"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Placed in Infrastructure Requirements for consistency
MM	BSWSA8	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA8	Infrastructure requirements	<u>"Contributions will be sought towards potential capacity and/or step free access improvements at Stonebridge Park station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the vicinity of the station."</u>	Advice from TfL Spatial Planning.
MM	BSWSA9	Planning considerations	"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."	Placed in Infrastructure Requirements for consistency.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
MM	BSWSA9	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Moved from planning considerations for consistency.
MM	BSWSA10	Planning Considerations	"...The loss of the garage means that employment use should be re-provided through a net increase in employment <u>industrial</u> floor space..."	Consistency with the London Plan.
MM	BSWSA10	Infrastructure requirements	<u>"Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."</u>	Thames Water advice.
MM	BSWSA12	Indicative Homes	" 24 <u>22</u> "	Reflects minded to approve scheme.
MM	BSWSA15	Indicative Homes	" 28 <u>36</u> "	Reflects minded to approve scheme.
MM	BSWSA16	Indicative Capacity	" 80 <u>120</u> "	Better reflects potential.
MM	BSWSA17	Indicative Capacity	" 150 <u>170</u> "	Reflects minded to approve scheme.
MM	Design	BD3	<u>"g) Be protected from sewer flooding by a suitable pumped device."</u>	Adapt to potential risk of basement flooding.
MM	Housing	BH1	Amend BH1 to "...to provide a minimum 27,482 <u>23,250</u> homes in the period 2019/20-2028/29. It will positively	Align with London Plan requirements in early

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Proposed Modification	Reason for Modification
			plan to promote a further minimum of 48,074 21,595 homes from 2029/30 to the end of the Plan period in 2041....."	years and take account of updated trajectory.
MM	Housing	BH2	"...edge of town centre sites, <u>areas with higher levels of public transport accessibility levels</u> , and intensification..."	Align with London Plan.
MM	Housing	BH2	" <u>a) the site is allocated or has planning permission for an alternative use(s);</u> a) <u>b) there is no need for it or reasonable prospect of its use if provided; or</u> b) <u>c) in exceptional cases that its loss is outweighed by the benefits that its replacement with residential floorspace will bring.</u> "	Clarify status of existing permissions in relation to policy.
MM	Housing	BH3	" <u>The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent. To encourage...</u> "	Align policy with the London Plan.
MM	Housing	BH4	POLICY BH4 SMALL SITES AND SMALL HOUSING DEVELOPMENTS IN BRENT Planning Permission for Small Sites will be determined in accordance with London Plan Policy H2A with the exception of: Criterion A2, which in Brent will only apply within PTAL 3-6 locations <u>Small housing developments (below 0.25 hectares or 25 dwellings in size) delivering a net addition of self-contained dwellings through the more intensive and efficient use of sites, where consistent with other policies in the development plan, will be supported within the priority locations of PTAL 3-6, intensification corridors, or a town centre boundary through:</u> a) <u>the infill of vacant or underused brownfield sites,</u>	More detailed policy and policy justification given that policy H2A has been removed from the Intend to Publish version of the London Plan.

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			<p>b) <u>residential conversions, redevelopment, extensions of dwellings, or infill within the curtilage of a dwelling</u></p> <p>c) <u>the redevelopment of flats, non-residential buildings and residential garages.</u></p> <p>d) <u>upward extensions of flats and non-residential buildings</u></p> <p><u>In these priority locations, the character of the existing area will be subject to change over the Local Plan period.</u></p> <p><u>Outside the priority locations greater weight will be placed on the existing character of the area, access to public transport and a variety of social infrastructure easy accessible on foot when determining the intensity of development appropriate.</u></p> <p><u>Developments that demonstrably fail to optimise potential housing delivery on a site or prejudice more comprehensive development, particularly that of a site allocation, will be refused.</u></p> <p><u>All minor residential developments (less than 10 dwellings) are required to deliver an Urban Greening Factor of 0.4 on site.</u></p> <p>6.2.39 The London Plan sets ambitious targets for small site development across London on the basis of the content of Policy H2 Small Sites and Policy H2A Small Housing Developments. The council is positive about the extent to which small sites can contribute towards meeting housing needs. It anticipates delivery of about 370 dwellings per year. In relation to Policy H2 and Policy H2A the council has in the Local Plan identified town centre boundaries and main movement/ public transport corridors (known as intensification corridors) as principal areas where it considers the most obvious potential exists.</p> <p>6.2.40 As an outer London borough Brent has comparatively high car dependency rates for journeys,</p>	

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			<p>particularly north of the North Circular Road. Some tube and railway stations are located in town centres, some however are not and otherwise have a poor level of access to viable public transport alternatives, employment and retail/ other facilities to meet every day needs away from the immediate vicinity of those stations. London Plan policy H2A's 800 metre buffer around town centres and underground/ railway stations also takes no account of the quality of the physical links to those centres or the quality of public transport service there. A large site development might be able to address these through contributions to improve links or public transport improvements/ contributions to provision of controlled parking zones. Small developments however usually are not subject to S106 and provide limited Community Infrastructure Levy funds which are therefore unlikely to be able to satisfactorily address such shortcomings. In addition, the percentage of residents that use the train/ underground as their main/ only mode of transport is very limited.</p> <p>6.2.41 As such the council considers that London Plan Policy H2A needs some refinement to take account of Brent circumstances. In areas where small scale development is likely to encourage high levels of car dependency it could undermine other objectives, such as reducing travel by car, improving air quality, maintaining quality of life of existing residents and impacting business efficiency related to movement of goods. As such in Brent criterion A2 has been amended to only apply where there are genuine reasonable public transport alternatives that could realistically encourage people to not own/ use a car on a frequent basis.</p> <p><u>6.2.39 The London Plan in Policy H2 Small Sites identifies that for London to deliver more of its housing; a substantial contribution from smaller sites below 0.25 hectares in size</u></p>	

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			<p><u>will be required. It sets a minimum target of 4,330 for the period 2019/20 - 2028/29 from this source. Consistent with the London Plan, the Council wants to encourage the development of small sites and provide a positive environment for small site developments in areas with good access to public transport and local services.</u></p> <p><u>6.2.40 The policy identifies the types of the developments considered likely to be appropriate and the priority locations for these types of developments. The areas are likely to be some of the better served by public transport and thus more sustainable, in terms of reducing reliance on the private car with its associated impacts, such as air quality. The Council accepts that priority locations that are not identified as designated heritage assets or areas of distinctive residential character are likely to be subject to substantial change in character over the Plan period. Whilst character will change, the Council will still expect high quality development.</u></p> <p><u>6.2.41a Developments are likely to be within close proximity to existing homes. They should therefore be carefully and creatively designed, to avoid for example an unacceptable level of harm to neighbours' and occupants' amenity. Building design and the placement of windows and the use of landscaping can positively address privacy matters and ensure homes benefit from satisfactory levels of daylight and sunlight. In addition to design guidance for small housing sites that the Mayor will produce, the Council is also likely to adopt its own guidance to reflect Brent's characteristics.</u></p> <p><u>6.2.41b Although it is likely that opportunities will exist outside the priority locations for small sites development, the intensity of development allowed is likely to be less. This is likely to be as a result of the existing character of</u></p>	

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			<p><u>those areas, which as they are not priority areas for development is not expected to significantly change. In addition the extent to which public transport and access to social facilities is within walking distance will also be considered. The poorer the access, the less intense the acceptable development is likely to be. In order to maximise the potential of all sites within the borough, small housing developments will not be acceptable where they fail to optimise potential housing delivery or prejudice the more comprehensive development of a wider site allocation.</u></p> <p><u>6.2.41c The open, green quality of the suburban environment was part of Brent's historical appeal. Over time, intensification of building coverage and hard landscaping, principally to accommodate cars, has reduced incidental green infrastructure. This has not only affected the visual quality of the environment, but has also bio-diversity, urban temperatures, air quality, and the volume and speed of surface water run-off, together with water quality. Small site development without some form of safeguards could well intensify these matters. Application of the urban greening factor to minor developments will assist in better addressing these matters, making up for the loss of green infrastructure where this might be lost, or supporting its re-introduction where sites may now have none. As such, delivery of green infrastructure on site consistent with an Urban Greening Factor of 0.4 will be sought on site with London Plan Policy G5 Urban Greening applying to minor developments (under 10 dwellings).</u></p> <p>LONDON PLAN Policy H2 Small Sites Policy H2A Small Housing Developments Policy G5 Urban Greening Policy D7 Accessible Housing</p>	

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MM	Housing	BH5	"...in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications</u> will be applied. The affordable housing..."	Improve clarity of alignment with London Plan.
MM	Housing	BH5	"Build to Rent developments, a minimum of 100 per cent at London Living Rent <u>equivalent rents or lower</u> ."	Improve policy clarity.
MM	Housing	BH8	"..benchmark housing provision target figure ..."	London Plan figures are a benchmark figure, not a target.
MM	Economy and Town Centres	BE1	".... <u>Further and higher educational provision</u> quarters at Northwick Park and Wembley will be protected and enhanced."	Provides greater clarity as final location of CNWL not yet known.
MM	Economy and Town Centres	BE2	"Within SIL and LSIS development will be supported where it intensifies employment <u>industrial</u> uses and accords with the principles as follows..." "Employment <u>Industrial Site</u> "	Align with London Plan policy.
MM	Economy and Town Centres	BE2	"..These sites will be protected for solely <u>industrial uses as defined in London Plan policy E4 Land for industry, logistics and services to support London's economic function</u> Criterion A. employment uses within use class B1c, B2, B8 and closely related sui generis uses. Development will be supported which increases the amount of employment <u>industrial</u> floorspace in these use classes , including start-up space, move on space. Any loss or reduction in floorspace will be resisted...."	Align with London Plan policy.
MM	Economy and Town Centres	BE2	".....A net increase in employment <u>industrial</u> floorspace; a mix of B1(b), B1(c), B2 and B8 employment floorspace will be...."	Align with London Plan policy.
MM	Economy and Town Centres	BE2	Northfields (<u>east and</u> west of Grand Union Canal)	Northfields east of the Grand Union Canal and

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				north of the River Brent is to be removed as a SIL designation on the policies map due to planning permission 18/0321. The remainder of the eastern site to the south of the River Brent is to be retained as SIL, which consistent with London Plan policy is regarded as appropriate for intensification.
MM	Economy and Town Centres	BE2	"Northfields (east of Grand Union Canal) SIL Co-location within site boundary of extant planning permission subject to as a minimum providing the amount, typology, and affordability of employment floorspace consistent with planning permission 18/0321. Intensification on the remainder of the SIL."	The principle of development of Northfields east of the Grand Union Canal and north of the river Brent for primarily residential purposes with some employment uses on site has been considered appropriate consistent with policy DMP14 in planning permission 18/0321. The site allocation BSWSA7 makes it clear that development of that site for residential is subject to a minimum amount of employment/ industrial floorspace being provided.
MM	Economy and Town Centres	BE3	<u>"The Council will require the retention of and where possible the intensification of Local Employment Sites in industrial</u>	Promote potential for intensification as a starting

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			<p><u>use</u>. The council will allow the release <u>development</u> of Local Employment Sites to <u>for</u> non-employment uses where:</p> <p>a) continued wholly employment use is unviable; or</p> <p>b) development increases the amount of <u>workspace as well as retaining the existing employment use or provides that additional workspace as</u> affordable workspace in the B use class, with makerspace in use class B1(c) prioritised to meet demand.</p> <p><u>Where criterion a) is being used to justify the release, the maximum viable replacement of the existing employment floorspace will be sought.</u></p>	point, whilst emphasising potential for other uses if required.
MM	Green Infrastructure	BG11	"...Major <u>residential</u> developments outside Growth Areas will be expected to provide 0.81 sqm of public open space per resident in the following manner..."	Clarify relevant use as sought by DfE.
MM	Sustainable Infrastructure	BSUI3	"...surface water flooding. <u>Proposed development must pass the sequential and exceptions test as required by national policy.</u> The design and layout..."	Reference need for sequential test on flooding as sought by Environment Agency.
MM	Transport	BT2	"c))....in line with or exceeding <u>London Plan standards and TfL and WestTrans design standards...</u> "	In response to TfL, reference to London Plan.
MM	Transport	BT3	"Development that would generate significant movement of goods or materials, both during construction and in operation, should minimise the movement of goods and materials by road. <u>Freight consolidation through maximising the use of the capacity of vehicles entering and exiting a site and the use of more sustainable alternatives, i.e.by rail and canal, and pursuit of best practice in technical innovation to consolidate delivery and construction transport</u> is encouraged."	Reflects comments made by TfL Spatial Planning and OPDC.

Minor Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Introduction		<u>"There will be a need to consider updates to national and London level policy and guidance after the Brent Local Plan is adopted. These might be substantial material considerations that alter the weight that can be applied to policies in the Plan when determining planning applications. Reference to these will be made in the respective reports associated with the determination of planning applications"</u>	Requirement to consider updated policy at national or regional level once Local Plan has been adopted.
MiM	Introduction	Figure 3	Amend to provide greater clarity on tiers of planning policy.	Greater clarity
MiM	Introduction	2.4	<u>"..has have.."</u>	Grammar
MiM	Brent's Characteristics	3.17	<u>".....medium term. However, to support new residential development, current projections indicate a new primary school will be required in Wembley Park by 2023."</u>	Reflecting need for school on the York House site and timing.
MiM	Brent's Characteristics	3.19	In terms of indoor sports facilities, <u>the Council's Indoor Sports and Leisure Needs Assessment identified</u> provision is significantly below needs. Swimming pools are between ¼-½ of the provision per head of population in adjacent boroughs. <u>There is also the need for additional sports halls. The Council's Playing Pitch assessment identified that for some sports, additional pitches are required.</u> This under provision is partly reflected by the levels of sports participation and physical activity across the borough.	Reference to evidence based documents as advised by Sport England.
MiM	Brent's Characteristics	3.28	Identify footnote 17 associated with the text "as with the provision of indoor facilities" Footnote 17 is <u>"Brent Council Indoor Sports and Leisure Facilities Needs Assessment November 2018"</u> Identify footnote 18 associated with the text "the provision of outdoor sports facilities" Footnote 18 is <u>"A</u>	Reference to evidence based documents as advised by Sport England.

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			<u>Strategic Approach to Playing Provision in Brent December 2016"</u>	
MiM	Brent's Characteristics	3.32	"...Its <u>will be used</u> as the boundary of the extended Ultra-Low Emissions Zone (UZEL) to be introduced in 2021 is unclear in terms potential changes on these adverse impacts. <u>Transport for London predict that the ULEZ 2021 will reduce air pollution in Brent by NO2 by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular."</u>	More certainty on impacts has been identified by TfL.
MiM	Brent's Characteristics	3.33	Strategic transport improvements will occur adjacent to the borough at Old Oak with the provision of a HS2/ Crossrail <u>Elizabeth Line</u> interchange station (2026), a new station at Brent Cross West Thameslink (2023) and potentially the West London Orbital with an additional stations <u>at Harlesden and Neasden</u> (2026).	To reflect name change and potential additional stations.
MiM	Development Vision and Good Growth in Brent	How Will Good Growth be Delivered?	" <u>1</u> Strong and Inclusive Communities" " <u>2</u> Making the Best Use of Land" " <u>3</u> Creating a Healthy Borough" " <u>4</u> Growing a Good Economy" " <u>5</u> Increasing Efficiency and Resilience" " <u>6</u> Delivering the Homes to Meet Brent's Needs"	To provide clarity for referencing purposes.
MiM	Places	All figures "High Level Plan of the Place Vision"	Include town centre boundaries if this does not reduce the effectiveness of the drawing.	Increase mapped information.
MiM	Places	All figures "High Level Plan of the Place Vision"	Include Growth Area boundaries if this does not reduce the effectiveness of the drawing.	Increase mapped information.
MiM	Places	All figures "High Level Plan of the Place Vision"	Include some street names to assist with orientation.	Increase legibility.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Places	All figures “High Level Plan of the Place Vision”	"High Level Plan of the Place. <u>More detailed boundaries can be seen on the Policies Map</u> "	To make it clear that relevant policy designation boundaries can be more easily viewed on the policies map.
MiM	Central	5.1.22	"...whilst also incorporating more employment <u>industrial</u> floorspace now that Brent...."	To be consistent with London Plan policy.
MiM	Central	5.1.29	"...by incorporating ground floor employment <u>industrial</u> uses,"	To be consistent with London Plan policy.
MiM	Central	5.1.33	"...The provision of Boxpark, Troubadour theatre (<u>meanwhile uses</u>) plus the development of Plot W12"	Acknowledge meanwhile status.
MiM	Central	5.1.40	"Wembley Growth Area <u>is the Wembley Opportunity Area, as designated in the London Plan. Its designation as an Opportunity Area means that its growth is of strategic importance to the whole of London. It covers an extensive element of the ...</u> "	Acknowledge spatial designation in the London Plan.
MiM	East		All paragraphs should start 5.2 as opposed to 5.1 as this is chapter 5.2	Correction
MiM	East	5.2.10	" Employment <u>Industrial</u> space that meets 21 st century needs..."	To be consistent with London Plan policy.
MiM	East	5.2.16	"The proposed Growth Areas of Staples Corner and Neasden Stations will provide the opportunities for new mixed use communities with a significant amount of employment <u>industrial</u> and residential floorspace. A masterplanning exercise will be undertaken <u>involving key stakeholders, landowners and developers to help shape the masterplan from conception to completion. This will</u> to identify the appropriate mix of uses and form of	Clarify engagement in masterplanning process. Consistency with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			development with a view to improving employment opportunities as well as homes.	
MiM	East	5.2.17	"...at a minimum replace, but ideally intensify employment <u>industrial</u> uses too...."	Consistency with the London Plan.
MiM	East	5.2.23	"....This will not be at the expense of employment <u>industrial</u> space...."	Consistency with the London Plan.
MiM	East	5.2.24	"....larger scale employment <u>industrial</u> uses with residential...."	Consistency with the London Plan.
MiM	East	5.2.25	"The Kingsbury employment <u>industrial</u> area retains principally clearly defined boundaries, with very little encroachment from non employment <u>industrial</u> uses. Exceptions have been the permitted development of office to residential which the council has now ceased through an Article 4 direction. The council will support the area's continued employment <u>industrial</u> use through encouraging investment only in employment <u>industrial</u> uses."	Consistency with the London Plan.
MiM	North	5.3.22	"...Intensification and co-location within the locally significant industrial sites in this place will create space that meets 21st century employment <u>industrial</u> needs and continue to provide good local employment opportunities....."	Consistency with the London Plan.
MiM	North	5.3.26	"...the intensification and co-location of employment <u>industrial</u> uses at the Queensbury LSIS and Morrisons sites....."	Consistency with the London Plan.
MiM	North	5.3.28	"...will need to address the requirement to intensify employment <u>industrial</u> uses too....."	Consistency with the London Plan.
MiM	North	5.3.29	"...will also support intensification of employment <u>industrial</u> space on the LSIS..."	Consistency with the London Plan.

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			"...to achieve an increase in employment <u>industrial</u> floorspace and retention of a food store..."	
MiM	North	5.3.40	"...The redevelopment of these sites is expected to intensify employment <u>industrial</u> floorspace and ensure long term safeguarding for employment <u>industrial</u> uses....."	Consistency with the London Plan.
MiM	North	5.3.46	"...the Growth Area boundary has been extended. <u>This new boundary is considered to form an extension to the Burnt Oak and Colindale Opportunity Area boundary previously identified to be within Brent...</u> "	Clarify so that it is clear where London Plan opportunity area policies apply.
MiM	North	5.3.47	"An extensive area of Locally Significant Industrial Site off Capitol Way provides the opportunity to better meet Brent's longer term employment <u>industrial</u> needs through investment in new premises. Consistent with London Plan employment <u>industrial</u> land policies..."	Consistency with the London Plan.
MiM	North West	5.4.12	"...which makes it supportive of employment <u>industrial</u> activities."	Consistency with the London Plan.
MiM	North West	Opportunities	"Intensification of employment <u>industrial</u> uses at East Lane.."	Consistency with the London Plan.
MiM	North West	5.4.26	"East Lane SIL has a number of positive characteristics which in the context of London Plan policy make it a good candidate for further intensification for employment <u>industrial</u> uses."	Consistency with the London Plan.
MiM	South	5.5.6	"Locally Significant Industrial Sites in Church End contain low density employment <u>industrial</u> uses..."	Consistency with the London Plan.
MiM	South	5.5.30	"The regeneration of Old Oak, an existing industrial site to the south of Harlesden, is planned. It will deliver 24,000 <u>25,500</u> homes and 55,000 <u>65,000</u> new jobs	Change related to review of OPDC Local Plan following Car Giant

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			<p>focussed around a new High Speed 2 and Elizabeth Line interchange <u>and intensification</u> in Park Royal is to deliver a further 10,000 jobs and 1,500 homes. The project is being led by the Old Oak Park Royal Development Corporation (OPDC). It will be important that the council continues to work with the OPDC <u>and Network Rail as the owners of the operational rail infrastructure, in addition to</u> Transport for London, <u>potential developers</u> and community groups. This is to ensure this significant regeneration project brings the highest number of benefits for Brent residents as possible. In particular, a key priority is to improve the connectivity between Old Oak and Harlesden through, now likely to focus on Old Oak Lane, <u>in addition to an enhanced Willesden Junction Station</u> (including over-station development), and wayfinding. This will better ensure local residents can benefit from job opportunities and new facilities and that Harlesden Town Centre is not adversely affected by a proposed major centre at Old Oak”</p>	site change and request from TfL spatial planning.
MiM	South	5.5.32	<p>“...There is an opportunity to extend the Growth Area boundary to include nearby low density employment <u>industrial</u> sites to promote investment in these areas. Church End Locally Significant Industrial Sites are low density employment <u>industrial</u> sites...”</p> <p>“..In advance of adoption of a Church End masterplan supplementary planning document which will seek comprehensive solutions for these employment <u>industrial</u> areas, small scale release of sites will be resisted.”</p>	Consistency with the London Plan.
MiM	South	Chapter Heading	“SOUTH <u>PLACE</u> ”	Consistency in the document
MiM	South East	5.6.5	“Although there are no designated employment <u>industrial</u> sites here...”	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			"Lonsdale Avenue <u>Road</u> "	Factual
MiM	South East	5.6.8	"The London Overground travels through this place <u>providing an orbital route</u> linking Richmond/Clapham Junction and Stratford ..."	Factual
MiM	South East	5.6.11	"...The proposed extension to the Mapesbury, <u>Kensal Green, Queen's Park, Brondesbury, Kilburn, and Willesden Green</u> conservation areas, <u>plus potential new ones for Kensal Rise, Kilburn Lane and Malvern Road</u> boundary to include parts of Cricklewood Town Centre reflects the distinct and special character of these areas as outlined in the Brent Heritage Study..."	Factual
MiM	South East	Following 5.6.7	"Although generally a relatively an affluent"	To correct typo
MiM	South East	5.6.22	"...Within this area there are no designated employment <u>industrial</u> sites here..."	Consistency with the London Plan.
MiM	South East	5.6.23	"In the Keep Britain <u>Tidy</u> qualitative study"	To correct
MiM	South East	5.6.24	" Crossrail <u>Elizabeth Line</u> "	To reflect name change
MiM	BSESA7	INFRASTRUCTURE REQUIREMENTS	"Thames Water will need to be engaged at the earliest opportunity to agree <u>a</u> drainage strategy"	To correct typo
MiM	BSESA13	RISKS	Amend to: "Need to decant existing residents. Relocation of current residents and their opposing. "	To correct typo and for consistency
MiM	BSESA18	ADDRESS	Amend to " 243 <u>245</u> -289...."	Correct address of allocation
MiM	BSESA18	DESIGN PRINCIPLES	"Development should respond to the height and proportions of adjoining 3 storey development and be of a quality which complements local character."	To correct typo

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	BSESA20	JUSTIFICATION	"The Brent Retail & Leisure Needs Study identifies to continue this positive momentum and additional"	To correct typo
MiM	BSESA20		Add OS based map of site	To correct
MiM	BSESA21		Add OS based map of site	To correct
MiM	BSSA6	PLANNING HISTORY	Amend to: "Planning <u>committee has been minded to approve an</u> application to develop 130 residential units on Argenta House site. (18/4847)"	To reflect change in status of planning application
MiM	BSSA6	PLANNING CONSIDERATIONS	Amend to: "The site contains a light industrial units."	To correct typo
MiM	South West	5.7.11	'...Sudbury & Harrow <u>Road</u> rail station...'	Correct name
MiM	South West	5.7.22	"Alperton (South) LSIS land will be protected for solely employment <u>industrial</u> uses within use class B1c, B2, B8 and all closely related sui generis uses and where possible its use intensified."	Consistency with the London Plan.
MiM	South West	5.7.23	"Redevelopment of existing industrial floorspace and provision of new employment <u>industrial</u> floorspace in mixed-use development (co-location)....."	Consistency with the London Plan.
MiM	South West	5.7.31	"..The redevelopment of Northfields Grand Union which has commenced for approximately 2900 <u>3030</u> new homes plus employment land..."	Correct dwellings to reflect current planning permission.
MiM	South West	5.7.32	"..Taking account of much of its use as either Locally Significant Industrial Site, Local Employment Site and Strategic Industrial Land and Brent's provide capacity status for employment <u>industrial</u> land in the London Plan, a greater emphasis on employment <u>industrial</u> use in	Consistency with the London Plan.

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			mixed use developments is now sought than was previously the case in allocations..."	
MiM	BSWA10		" BSWA10 <u>BSWSA10</u> "	Correct reference
MiM	BSWSA10	Design Principles	"... pubic <u>public</u> space..."	To correct typo
MiM	Housing	6.2.12	"... Whilst they do <u>Where such accommodation is purpose built, well managed and high quality it provides a valuable role in meeting housing need and will be supported. However where this is not the case their concentration can sometimes have adverse impacts on neighbours. HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families.</u>"	Provide clarity in certain situations as sought by Quintain.
MiM	Housing	6.2.16	"..benchmark target <u>figure</u> ..."	London Plan figures are a benchmark figure, not a target as identified by GLA.
MiM	Housing	After paragraph 6.2.27 under London Plan heading	" Policy H9 Vacant Building Credit ".	Policy removed from London Plan.
MiM	Housing	6.2.69	"...The landlords will be expected to register properties in conformity with the council's licensing scheme. <u>In Build to Rent developments (as defined in the London Plan Policy H13) the Council is aware that operators may want to rent some self-contained properties to sharers and that it would be an unnecessary burden on both the Council and the developer to require planning permission for each change of use from self-contained dwelling to House in Multiple Occupation. As such the Council will seek to work with Build to Rent schemes to ensure that there is sufficient flexibility in planning permissions to ensure that</u>	To provide greater clarity on how Build to Rent schemes will be dealt with where properties are expected to be let to sharers.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>an agreed number of dwellings can be used as Houses in Multiple Occupation at any one time."</u>	
MiM	Housing	Add 6.2.78a	<u>"The inclusion of older people's housing will play a part in creating mixed and balanced communities. The Housing Learning and Improvement Network (Housing LIN) provides a good source of information on high quality and innovative housing solutions for an aging population. Guidance has been produced by HAPPI (Housing our Aging Population Panel for Innovation) that gives examples of how to design homes so that they better meet users' needs. It also shows how they can be positively integrated into places to encourage the benefits that interaction creates between occupiers of the dwellings and the wider community."</u>	Increased justification and guidance.
MiM	Housing	6.2.100	<u>"...meet residents' needs. Where not meeting the standards, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account factors such as, accessibility of dwellings to their own amenity space and its quality, the amount and quality of communal space, proximity to other areas of open space nearby and internal amenity spaces. The calculation...."</u>	Build in policy flexibility.
MiM	Economy & Town Centres	6.4.9	"The London Plan identifies Brent as having potential to provide additional employment <u>industrial</u> floorspace capacity. To achieve this, there will be a need to make better use of industrial sites and secure additional employment <u>industrial</u> floorspace elsewhere. This will be through intensification of SIL and LSIS to increase plot ratio to a minimum of 0.65; seeking an increase in employment <u>industrial</u> floorspace on non-designated industrial sites; securing new employment <u>industrial</u> floorspace in Growth Areas and through the diversification of town centres."	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Economy & Town Centres	Following 6.4.10	"London Plan E7 <u>Industrial</u> intensification, co-location and substitution"	Reflect Intend to Publish London Plan
MiM	Economy & Town Centres	Following 6.4.10	Place before SD8: "London Plan SD8 <u>7</u> Town Centres: Development principles and Development Plan Documents"	Reflect Intend to Publish London Plan
MiM	Economy & Town Centres	Following 6.4.10	"London Plan SD7 <u>8</u> Town centre network"	Reflect Intend to Publish London Plan
MiM	Economy & Town Centres	6.4.11	"...to provide additional employment <u>industrial</u> floorspace. All major developments exceeding 3000 sq.m in the Growth Areas outlined above <u>in policy BE1</u> should"	Consistency with the London Plan and for clarity
MiM	Economy & Town Centres	6.4.12	"If an <u>operator</u> is ..."	To correct typo
MiM	Economy & Town Centres	6.4.12	"The level of fit out of the workspace to a specification agreed with the Affordable Workspace Provider <u>Operator</u> and to ..."	To correct
MiM	Economy & Town Centres	6.4.15	" Major developments will be required to produce an Employment, Apprenticeship and Training Plans <u>will be required</u> in line with ..."	To correct to reflect policy BE1 and for clarity
MiM	Economy and Town Centres	6.4.18	"... The West London Employment Land Review (WLELR) identified demand for an additional 0.6ha of industrial floorspace, primarily to meet projected demand for logistics. In addition to this, a number of sites within designated industrial sites are protected for waste purposes as identified in the West London Waste Plan and the policies map. The London Plan sets a higher waste target for Brent than previously which may mean additional sites for waste purposes will be required. Consistent with its 'provide capacity' status Brent the Council is committed to exceeding this figure deliver an te increase <u>in industrial floorspace to support growth in</u> "	Align with London Plan policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			business and employment."	
MiM	Economy and Town Centres	6.4.18	"...intensification of Park Royal which is being led by the OPDC. <u>The extent to which intensification and co-location will lead to an increase in industrial floorspace at this time is not known. Initial preliminary masterplan options work on Staples Corner in association with the GLA has shown addressing landownership and viability issues to incentivise and deliver additional floorspace is a complicated process. Nevertheless, the Council will undertake best endeavours to provide additional capacity, with a backstop position of not dropping below the 0.65 plot ratio within each defined industrial location.</u> "	Align with London Plan policy.
MiM	Economy & Town Centres	6.4.18	Amend to: "The West London Employment Land Review Evidence (WLELR-WLELE) "	To correct
MiM	Economy & Town Centres	6.4.19	"WLELR-WLELE"	To correct
MiM	Economy and Town Centres	6.4.20	"In calculating what constitutes the minimum floorspace requirement required in any site's redevelopment, the existing employment <u>industrial or warehousing</u> floorspace or a plot ratio of 0.65 will be applied, whichever is the higher..."	Align with London Plan policy.
MiM	Economy & Town Centres	6.4.21	"...closely related sui generis uses. <u>They can be sites wholly in employment use, or part of the floorspace or yardspace of a mixed use building or site. They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy in recognition of the borough's provide capacity status seeks to support the retention and intensification of Local Employment Sites for continued industrial use, consistent with policy E7 of the London Plan. The policy...."</u>	To provide greater clarity/ consistency with London Plan on sites in industrial use.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Economy & Town Centres	6.4.22	"...with short term flexible leases appropriate for SMEs. <u>Where the Council accepts that a site is unviable for its retention for wholly employment purposes, it will seek the re-provision of maximum amount of employment space that is viable in any development proposal.</u> "	To clarify that employment floorspace provision will be sought where wholly employment use is unviable.
MiM	BE4		Formatting: "DIVERSITY OF USES" should not be the policy title but is a heading related to the policy wording below of: "No further...."	To correct
MiM	Economy & Town Centres	Following 6.4.61	"West London Employment Land Review <u>Evidence</u> -2019, GL Hearn"	To correct
MiM	Economy & Town Centres	Following 6.4.61	" West London Affordable Workspace Study, 2019 Avison Young "	To correct
MiM	Economy & Town Centres	Following 6.4.61	"Brent Industrial Land Audit and Intensification Analysis 2019, Brent Council"	To correct
MiM	Economy & Town Centres	6.4.30	"As referenced in the London Plan and Brent policy BHC4, the night time economies of Wembley has been identified as areas of National/ International importance, and those of Cricklewood, <u>Kilburn</u> and Wembley Park..."	To reflect London Plan.
MiM	Heritage and Culture	Title Page	" <u>6.5</u> 6-2 "	Correct chapter reference.
MiM	Heritage and Culture	6.5.18	"...Its archaeological discoveries <u>to date</u> are scarce; ..."	Acknowledge uncertainty.
MiM	Heritage and Culture	6.5.19	"...Policy BD4 <u>BHC1</u> therefore..."	Reference correct policy.
MiM	Heritage and Culture	6.5.26	"...evaluation, <u>in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works.</u> <u>Applicants should consult with Historic England's Greater London Archaeological Advisory Service should take</u>	Improve guidance.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>place in order to determine the scope of the archaeological requirements."</u>	
MiM	Heritage and Culture	6.5.29 start of paragraph	" <u>17 views have been identified. Two views originate outside the area where the Council is Local Planning Authority. The Council has made OPDC and LB Ealing aware of each view's origins and it will be for them to determine the weight to give to the importance of the views when considering proposed development in their respective areas. London Plan....</u> "	Clarity of position in response to OPDC.
MiM	Green Infrastructure	6.6.10	"Brent's existing blue infrastructure or Blue Ribbon Network, includes the <u>River Lower Brent, Welsh Harp, Grand Union Canal - Paddington Arm, Wealdstone Brook, Brent Feeder Canal and Dollis Brook and Upper Brent.</u> "	Provide clarity on named blue infrastructure as sought by Environment Agency.
MiM	Green Infrastructure	Evidence Base	"Brent Biodiversity Action Plan 2007 <u>OTHER GUIDANCE</u> <u>Biodiversity Metric 2.0. DEFRA/ Natural England Biodiversity net gain. Good Practice Principles for Development. A Practical Guide CIRIA/CIEEM/IEMA"</u>	Include more guidance as sought by Natural England/ Environment Agency.
MiM	Green Infrastructure	6.6.30a	" <u>The River Brent, which gives the borough its name, formed a natural division between Willesden and Wembley. The name 'Brent' is Old English, from Celtic words meaning 'sacred waters'. The River Brent is formed of a number of tributaries, which join and flow to the borough of Ealing. Despite much of it now being culverted, it is significant to Brent's history and culture. Just as important are the Grand Union Canal and Brent Feeder Canal which are completely artificial watercourses and important as historic transport infrastructure. By 1820 there was not enough water to supply the canal, so under an Act of Parliament in 1819, the Regent's Canal Company decided to dam the River</u>	To provide greater emphasis on watercourses with heritage value in response to Canals and Rivers Trust.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>Brent and create a reservoir, an artificial lake, in order to guarantee a sufficient water supply. These water landscapes are recognised as non-designated heritage assets for their historic significance to protect and enhance cultural and heritage value to Brent. Equally, so is the protection, promotion and enhancement of their curtilage, which impact on the setting of these heritage assets.</u> “	
MiM	Green Infrastructure	6.6.31	“ <u>Canal Cottage, Twyford Abbey Road (now in OPDC area) and Reservoir Cottage, in Birchen Grove, are locally listed but much of the twentieth-century development and canal heritage is not protected, and in particular, deserves better recognition. For example, the canal is supported by two aqueducts, one as it passes over the River Brent, the Twyford Aqueduct and the other over the North Circular Road (A406). Other historic features of the canal include a WWII concrete pillbox, bridges and concrete drainage mechanisms. The appropriate.....</u> ”	Identification of heritage assets in response to Canals and Rivers Trust.
MiM	Green Infrastructure	6.6.34	"The Water Framework Directive is a European Union Directive which commits all member states <u>are required</u> to achieve achieving a 'good' status' or 'good ecological' status by 2021, or if an extension is granted, then for all water bodies by 2027. "	Strengthen and improve clarity as sought by Environment Agency
MiM	Green Infrastructure	6.6.35	"In Brent <u>all</u> waterside developments and other developments..."	Strengthen.
MiM	Green Infrastructure	6.6.36	" 6.6.36 a) " and remainder of bullets subsequent and paragraph numbers.	Correct.
MiM	Sustainable Infrastructure	6.7.5	"...as well as devastating environmental impacts. <u>Brent is susceptible to flooding from different sources.</u> Fortunately, over the last twenty years, Brent has not	Reference types of flooding as sought by Environment Agency.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			experienced major flooding <u>from its brooks and rivers</u> , with the most recent events..."	
MiM	Sustainable Infrastructure	6.7.9	"The Council made its "climate and ecological emergency" declaration in July 2019, promising to aim for carbon neutrality by 2030. It will be delivering a new climate strategy in 2020, which will provide greater clarity on the actions that will be taken in Brent to address <u>climate change</u> . In terms of clean generation....."	To identify added priority given to climate change by the Council in 2019.
MiM	Sustainable Infrastructure	6.7.35	"...subject to periodic review. <u>6.7.35a In exceptional circumstances and consistent with national policy outputs there may be occasions where development in the functional floodplain is required. For the most part this is likely to be only for water compatible uses. Nevertheless, due to development that has occurred in Brent in what would otherwise have been functional floodplain, there may be exceptional circumstances where it is appropriate for small incursions into the functional floodplain to be considered acceptable in principle if it has other significant benefits in relation to watercourse environment or risk of flooding. Examples could be returning a larger area to functional floodplain, or reducing the likelihood of impediments to river flow that might currently exist, such as stilts holding up buildings over a watercourse. Where any intervention that is defined as development in the functional floodplain occurs, the council will also seek the opportunity to improve through that development the environmental quality of the watercourse.</u> "	Supporting text for development on floodplain to clarify following representation from Environment Agency.
MiM	Transport	6.8.6	" <u>Crossrail Elizabeth Line, Great Western Mainline</u> and High Speed 2 stations)..."	To reflect name change and acknowledge other lines that will be connected to.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Transport	6.8.6	"....A pedestrian route over the A5 is needed to connect Brent Cross West station to Staples Corner. <u>The precise location of the WLO stations will be firmed up as the project progresses. When there is more certainty on their location more detailed work can be done on improving their connectivity to surrounding areas.</u> To the south....."	Reflects circumstances.
MiM	Transport	6.8.14	"This includes mitigation on small scale schemes"	To correct typo
MiM	Transport	6.8.16	"The requirements for electric charging points and cycle parking are set out in London Plan policy <u>T5 and T6-T6.1.</u> "	To correct referencing as sought by TfL Spatial Planning.
MiM	Transport	Figure 38	Colourwash the OPDC area and include on the key. Provide higher definition Figure Map	To provide clarity on OPDC and LB Brent local planning authority areas
MiM	Delivery and Monitoring	7.1.6	"...thorough cross subsidisation <u>subsidy</u> on development "...arm's length delivery vehicle (<u>company name: i4B</u>) in assisting .."	Grammar and supplementary information.
MiM	Delivery and Monitoring	7.1.8	"...on-going funding..."	Correct spelling
MiM	Delivery and Monitoring	7.1.15	"...additional premises. <u>There is the potential for expansion of healthcare provision in the Brent area to support growth in adjacent communities and vice versa. The Council and the Brent CCG will work with adjoining boroughs (and OPDC) and relevant CCGs to ensure suitable and timely provision of necessary facilities.</u> "	Acknowledge cross-boundary working/ provision as identified by OPDC.
MiM	Delivery and Monitoring	7.1.18	"..open space are <u>is</u> the Brent River Park" "...different ways of trying seeking to support...."	Grammar corrections.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification												
MiM	Delivery and Monitoring	Figure 39 new first and second measures:	"Proportion of Brent Local Super Output Areas in the <u>bottom 20% of most deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>15% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> " Performance Measure " <u>Proportion of the top 20% least deprived areas nationally as identified in the Indices of Multiple Deprivation.</u> " Target " <u>2% 2031</u> " Specific Policy to be monitored " <u>Development Vision</u> "	Improve monitoring of policy outcomes.												
MiM	Delivery and Monitoring	Figure 39	"Performance Measure <u>Number of homes built on small sites.</u> Target <u>433 dwellings.</u> Specific policy to be monitored BH4 "	Create target for monitoring.												
MiM	Appendix 1		<p>8.1.1 Once adopted, the <u>The</u> policies in this version of the Local Plan will replace the majority of all policies within the Local Plan documents identified above. A small number of policies in the Brent Development Management Policies Plan will be taken forward unchanged with the exception of their policy number.</p> <table><tr><th>Policy Reference</th><th>Status</th></tr><tr><td>DMP1, DMP2, DMP3, MP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20 <u>All policies</u></td><td>Superseded</td></tr><tr><td>DMP4a</td><td>Now referenced BE7</td></tr><tr><td>DMP5</td><td>Now referenced BE8</td></tr><tr><td>DMP7</td><td>Now referenced BHC1</td></tr><tr><td>DMP21</td><td>Now referenced BHC5</td></tr></table>	Policy Reference	Status	DMP1, DMP2, DMP3, MP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20 <u>All policies</u>	Superseded	DMP4a	Now referenced BE7	DMP5	Now referenced BE8	DMP7	Now referenced BHC1	DMP21	Now referenced BHC5	To reflect fact that the draft Local Plan has amended policies which it previously considered did not need updating and which are therefore going to be superseded.
Policy Reference	Status															
DMP1, DMP2, DMP3, MP4, DMP 6, DMP 8, DMP 9, DMP9a, DMP9b, DMP10, DMP11, DMP12, DMP13, DMP14, DMP15, DMP16, DMP17, DMP18, DMP19 and DMP20 <u>All policies</u>	Superseded															
DMP4a	Now referenced BE7															
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DMP7	Now referenced BHC1															
DMP21	Now referenced BHC5															

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification																																				
MiM	Appendix 2		SCHEDULE THAT SHOWS HOW LONDON PLAN DESIGN POLICY AND BRENT SPD1 DESIGN PRINCIPLES ARE INTER RELATED	To provide greater clarity on what the Appendix is for.																																				
MiM	Appendix 3		<div><div>BRENT LOCAL PLAN HOUSING DELIVERY TRAJECTORY. Consistent with Policy BH1 'Increasing Housing Supply in Brent' this trajectory is the delivery target against which the National Planning Policy Framework's Housing Delivery Test and 5 year Supply of Deliverable Housing Sites will be assessed.</div><table><tr><td>Year</td><td>19/20-23/24</td><td>24/25-28/29</td><td>29/30-33/34</td><td>34/35-40/41</td><td>Total</td></tr><tr><td>Dwellings</td><td>15,080 11,625</td><td>12,402 11,625</td><td>11,514 12,715</td><td>6,560 8,800</td><td>45,554 44,845</td></tr><tr><td>Average Per Year Over Period</td><td>3,016 2,325</td><td>2,480 2,325</td><td>2,302 2,543</td><td>937 1,268</td><td>2,070 2,038</td></tr><tr><td>Year</td><td></td><td>19/20-28/29</td><td></td><td>29/30-40/41</td><td></td></tr><tr><td>Dwellings</td><td></td><td>27,482 23,250</td><td></td><td>18,074 21,595</td><td>45,554 44,845</td></tr><tr><td>Average Per Year Over Period</td><td></td><td>2,748 2,325</td><td></td><td>1,807</td><td>4,555 2,038</td></tr></table></div>	Year	19/20-23/24	24/25-28/29	29/30-33/34	34/35-40/41	Total	Dwellings	15,080 11,625	12,402 11,625	11,514 12,715	6,560 8,800	45,554 44,845	Average Per Year Over Period	3,016 2,325	2,480 2,325	2,302 2,543	937 1,268	2,070 2,038	Year		19/20-28/29		29/30-40/41		Dwellings		27,482 23,250		18,074 21,595	45,554 44,845	Average Per Year Over Period		2,748 2,325		1,807	4,555 2,038	To provide greater clarity on what the trajectory will be used for and updated to reflect estimated delivery based on knowledge of sites.
Year	19/20-23/24	24/25-28/29	29/30-33/34	34/35-40/41	Total																																			
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MiM	Appendix 4		“BRENT PARKING STANDARDS TO BE USED IN ASSOCIATION WITH POLICY BT2 PARKING AND CAR FREE DEVELOPMENT WHICH ARE CONSIDERED NECESSARY RELATED TO BRENT’S CHARACTERISTICS RATHER THAN THOSE IN THE LONDON PLAN.”	Provides greater clarity on link between Appendix 4 and the Policy BT2.																																				

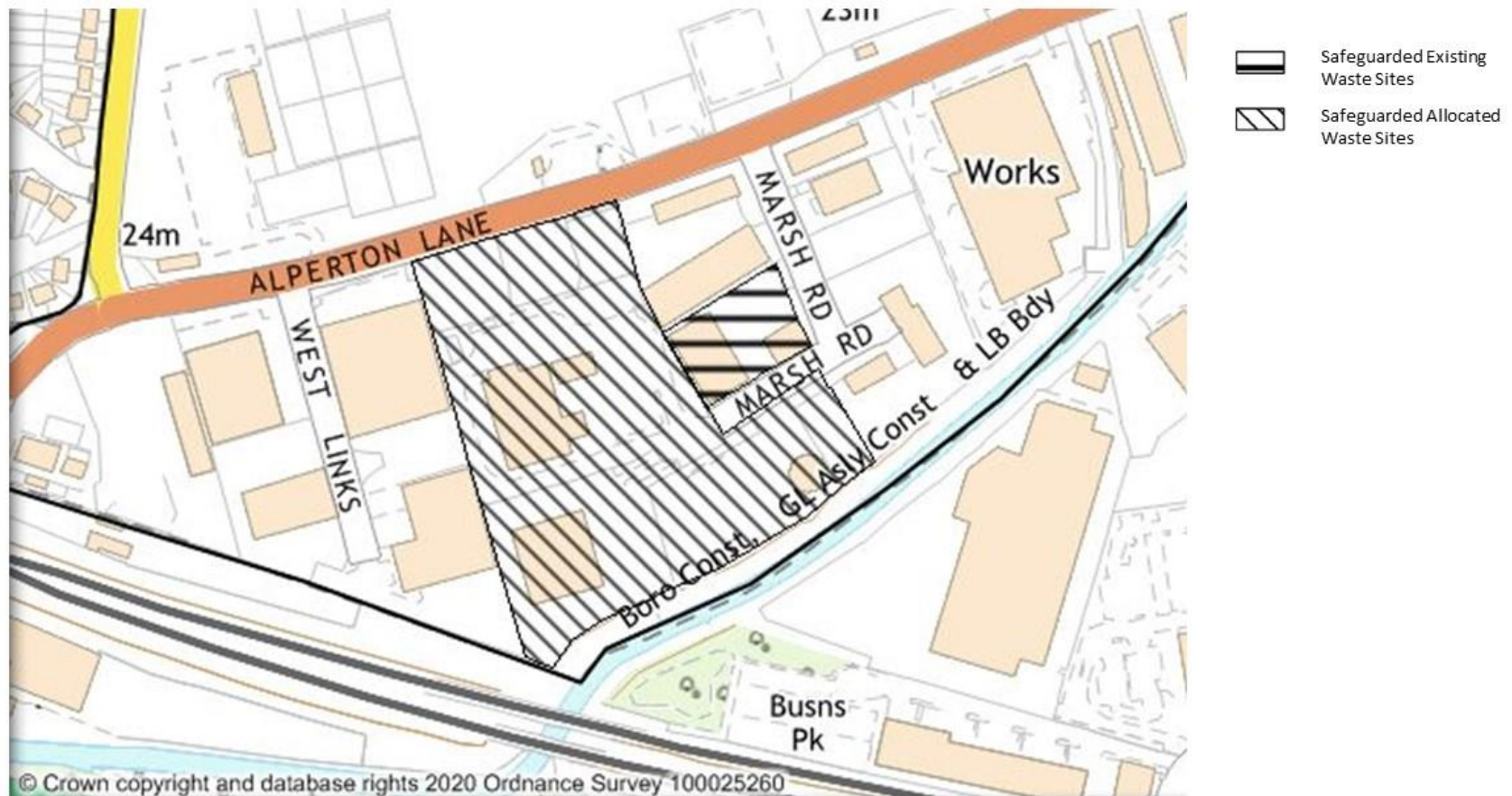
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM	Appendix 4	8.4.5 c)	"one coach parking space should be provided for every 50 75 bedrooms".	Correction
MiM	Appendix 5		<u>"BRENT NON RESIDENTIAL PREMISES SERVICING STANDARDS AS REQUIRED IN ASSOCIATION WITH POLICY BT3 'FREIGHT AND SERVICING, PROVISION AND PROTECTION OF FREIGHT FACILITIES'."</u>	Provides greater clarity on link between Appendix 5 and the Policy BT3.
MiM	Appendix 6	Non-strategic policies	"..BESA4,..."	No Policy BESA4 is in the Local Plan
MiM	Glossary	Add	<u>"Intensification Corridor: Principal movement corridors such as main roads, with good access to public transport where it is considered that higher density development/buildings around 5 storeys are likely to be appropriate."</u>	Provides clarity on term.
MiM	Glossary	Locally Significant Industrial Sites (LSIS)	<u>"Employment Industrial sites identified in the Core Strategy Local Plan as being of significance to Brent's economy."</u>	Consistency with London Plan and update which Plan it is identified.
MiM	Figures	Throughout	Include railway lines/ stations on all appropriate maps within the Plan	To provide clarity on rail infrastructure.

Modifications to the Policies Map

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 1-5	None	None	Identify safeguarded waste sites as set out in the West London Waste Plan	To provide clarity on sites that have associated policies in the West London Waste Plan
Map Mod 6	Central	BCGA1	Identify Wembley Growth Area/Opportunity Area with a boundary consistent with the Wembley Growth Area.	Provide clarity on Wembley Opportunity Area for associated London Plan policies.

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 7	North	BNGA1	Identify Burnt Oak Colindale Growth Area/Opportunity Area with a boundary consistent with the Burnt Oak Colindale Growth Area.	Provide clarity on Burnt Oak Colindale Opportunity Area for associated London Plan policies.
Map Mod 8	Design	BD2	Amend the policies map to include the Northfields development site within the Tall Buildings Zone. Update the associated Tall Buildings Strategy to reflect this change.	Ensure that the Zone and policy is reflective of an extant planning permission that incorporates tall buildings.
Map Mod 9	Design	BD2	Amend the map in the Tall Buildings Strategy and Policies Map to show the Tall Buildings Zone Core in Zone C of the Colindale Tall Buildings Zone extending to the edge of the main building line along Edgware Road so that it is consistent with the text in paragraph 8.51 of the Tall Buildings Strategy.	Improve Plan consistency.
Map Mod 10	Design	BD2	Remove from the Planning Policies Map Key: "Pinnacle" associated with the Tall Buildings Zones.	Remove old terminology.
Map Mod 11	Design	BD2	Add appropriate building heights for the Tall Buildings Zones on the interactive map consistent with the Tall Buildings Strategy.	To provide information that will support the policy.
Map Mod 12	Economy & Town Centres	BE2	Amend boundary of Northfields SIL to take account of planning permission 18/0321 where the principle of the loss of the site to predominantly residential development has been approved.	To provide clarity regarding the status of the site to no longer be considered as a Strategic Industrial Location.

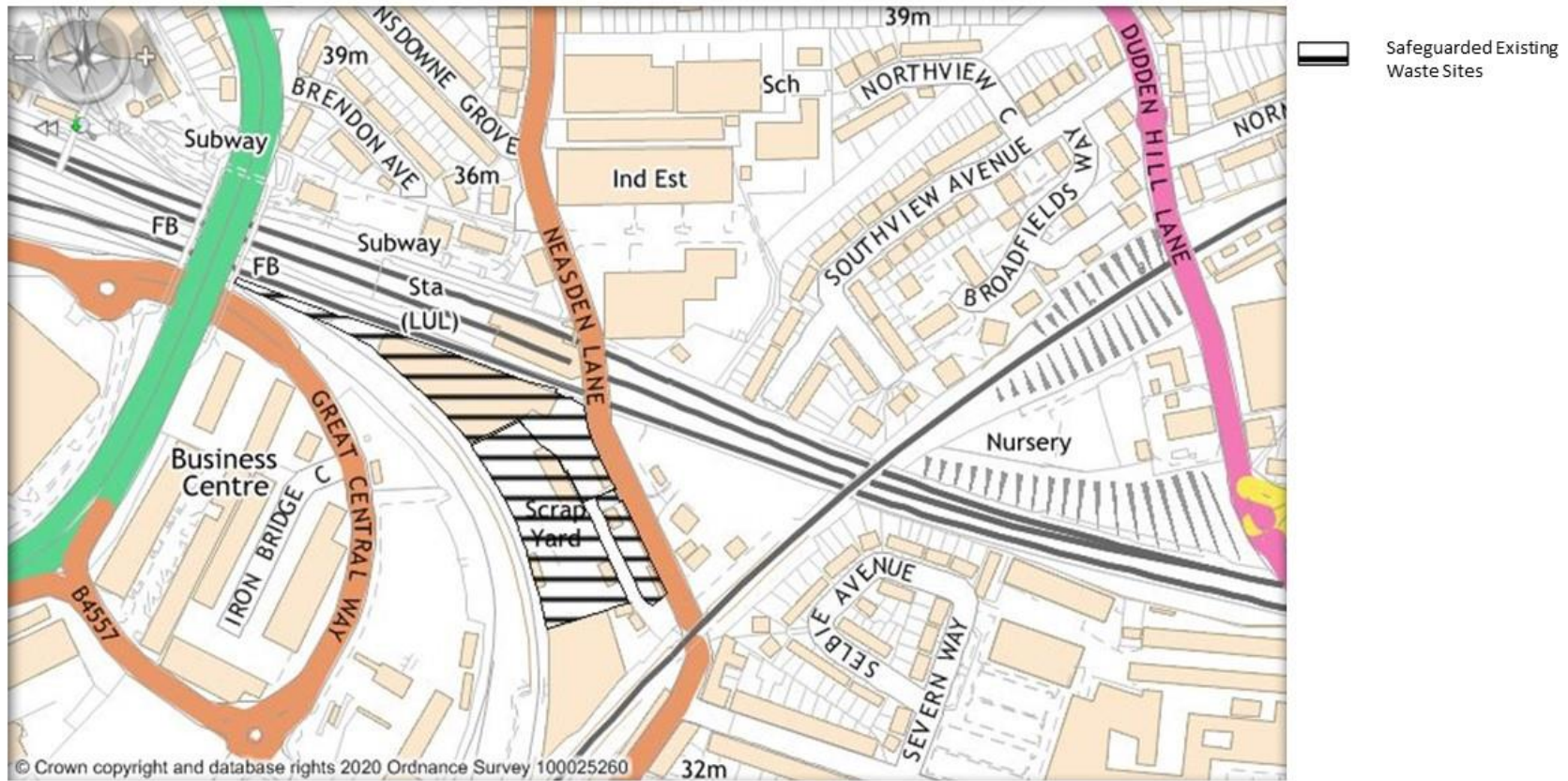
Map Mod 1 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Alperton Lane



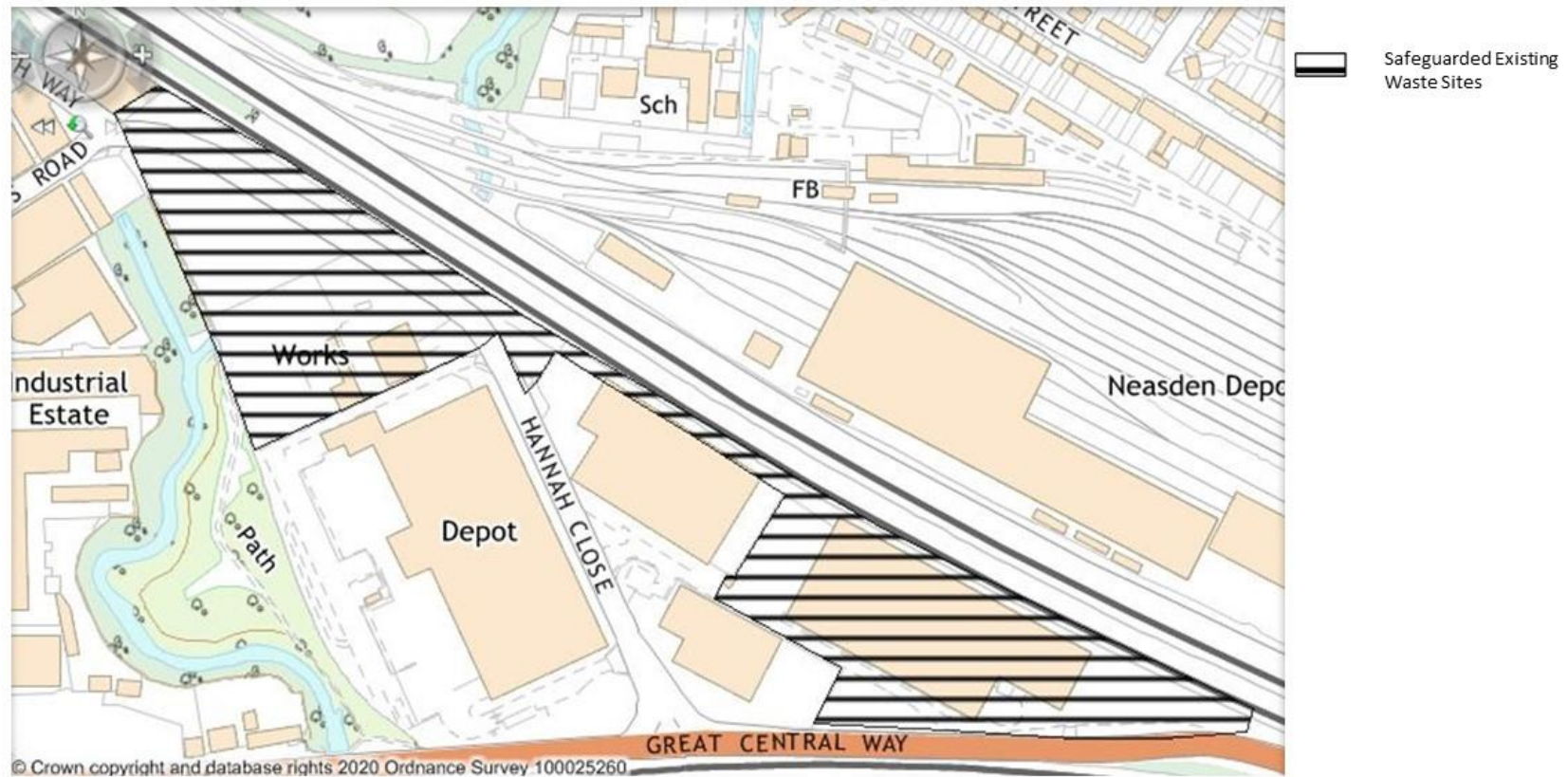
Map Mod 2 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Mount Pleasant



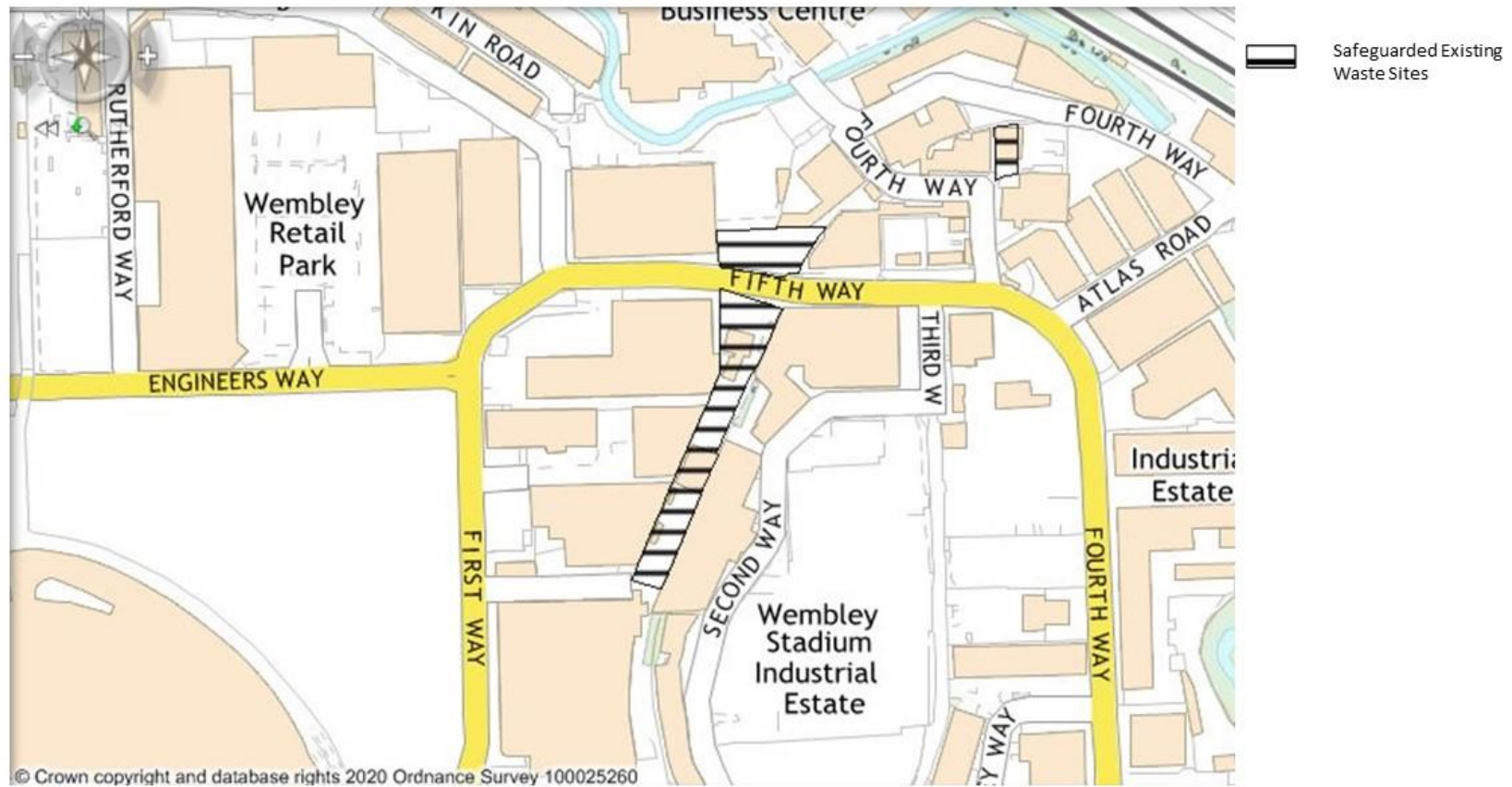
Map Mod 3 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Neasden Lane



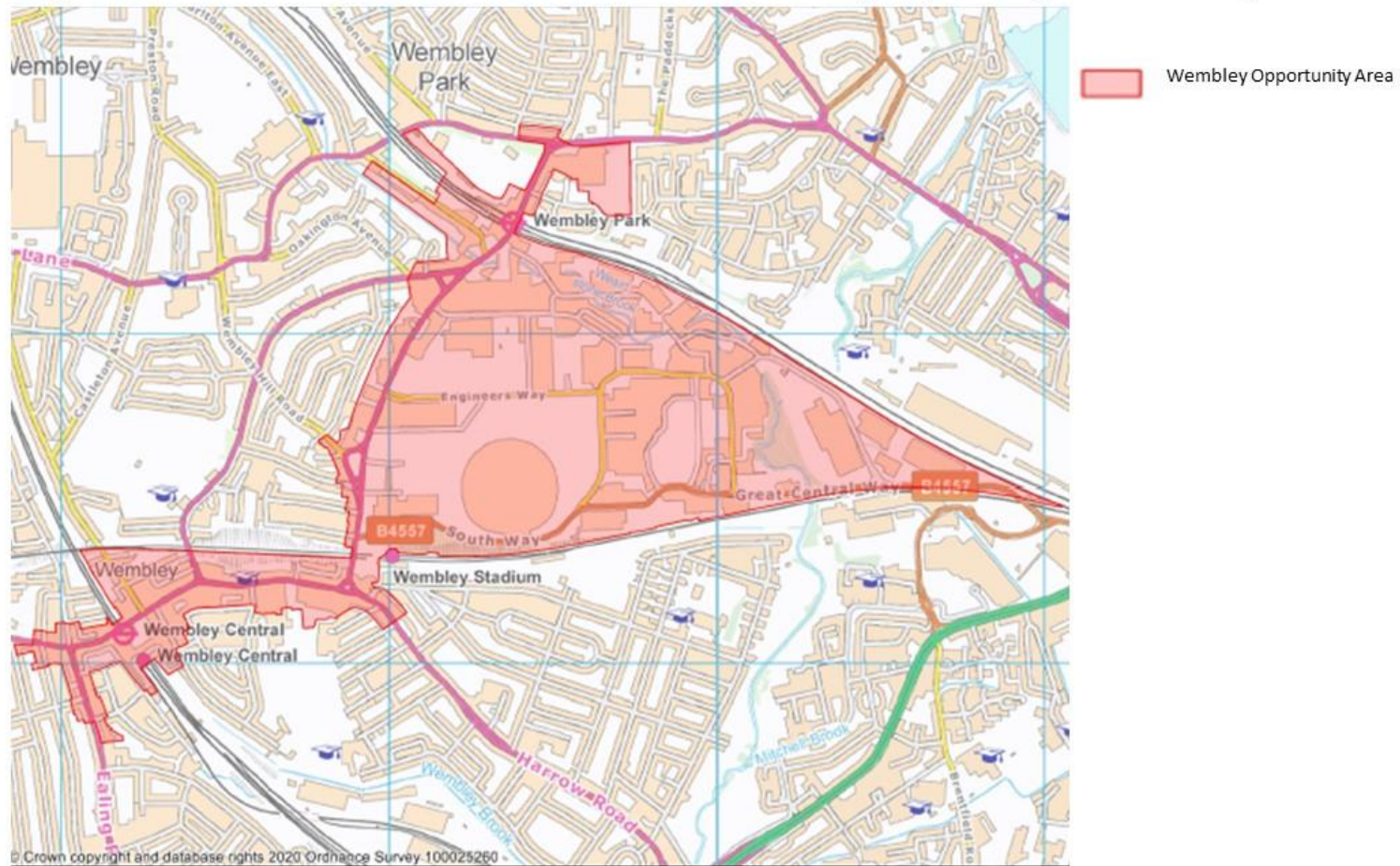
Map Mod 4 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Wembley Hannah Close



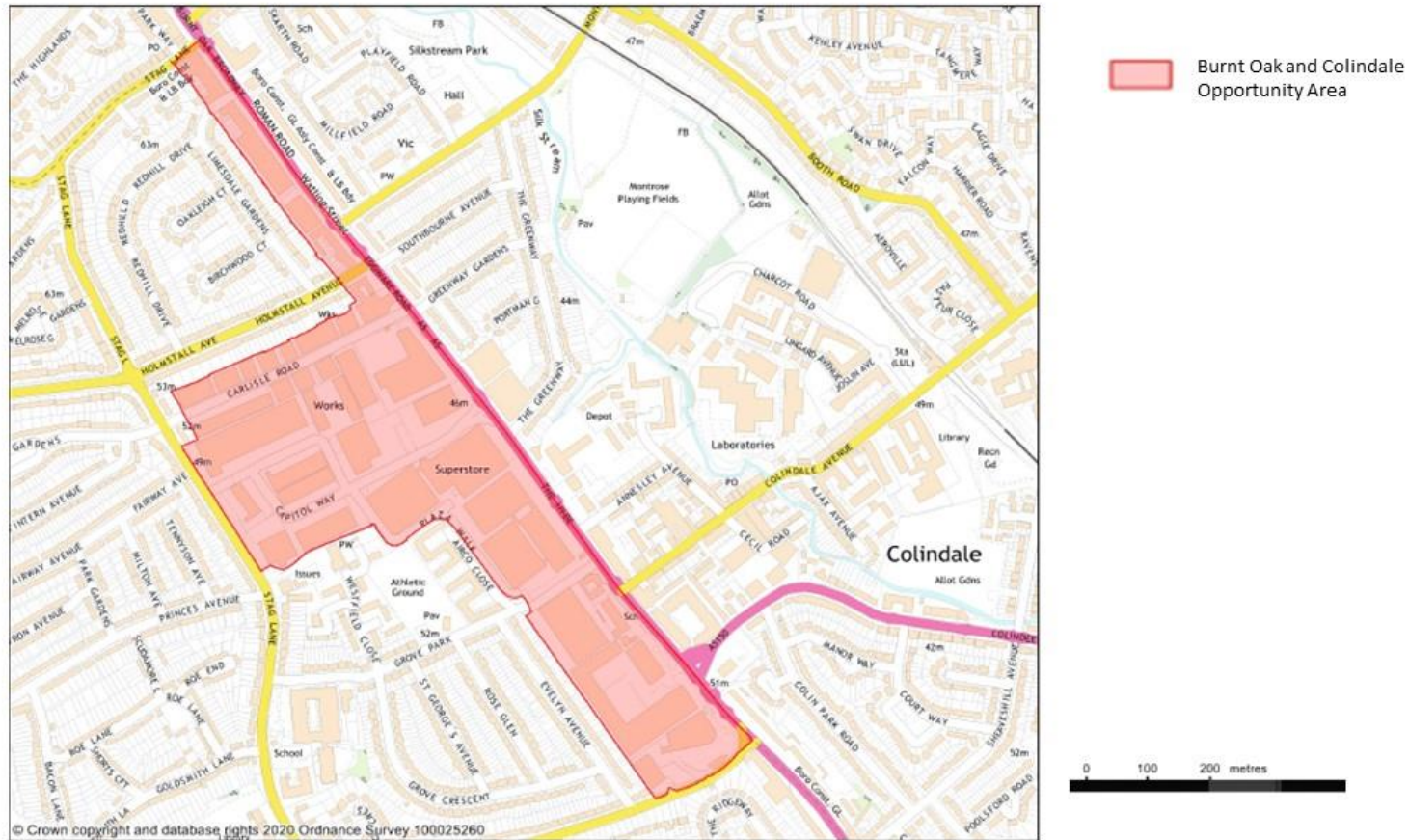
Map Mod 5 Brent Draft Local Plan Submission Version West London Waste Plan Boundaries – Wembley Fourth & Fifth



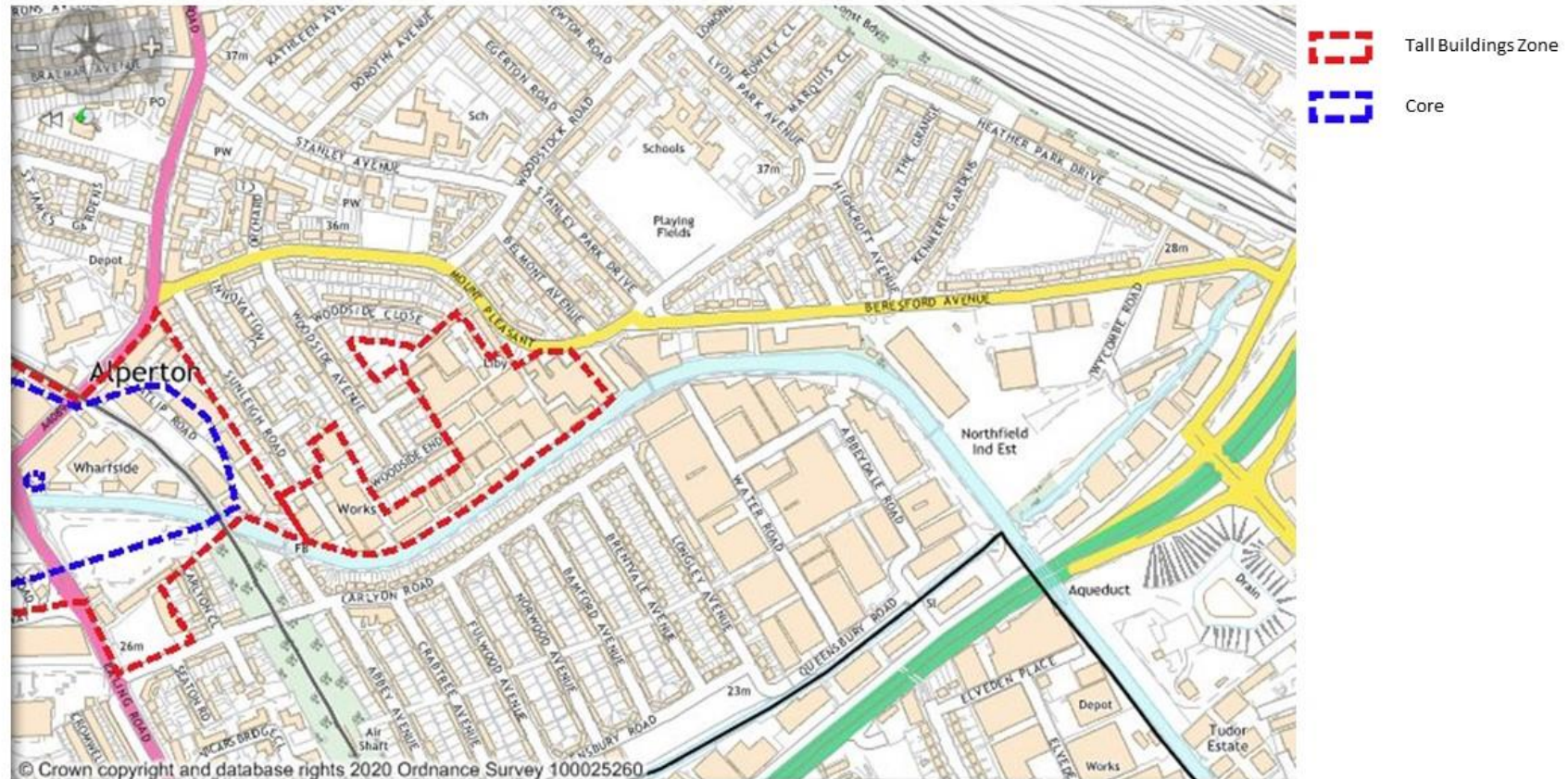
Map Mod 6 Brent Draft Local Plan Submission Version Wembley Opportunity Area Boundary



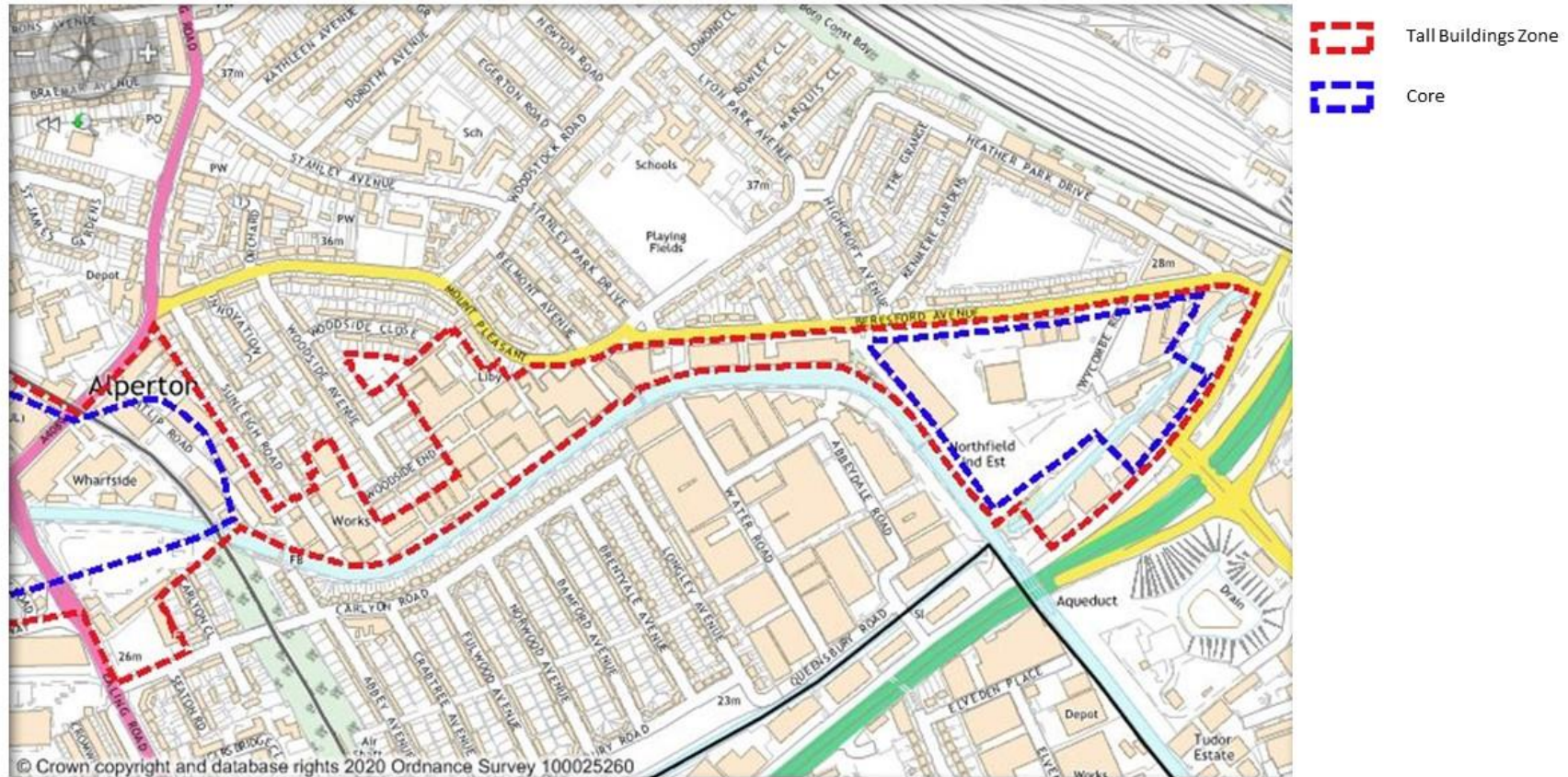
Map Mod 7 Brent Draft Local Plan Submission Version Burnt Oak and Colindale Opportunity Area Boundary



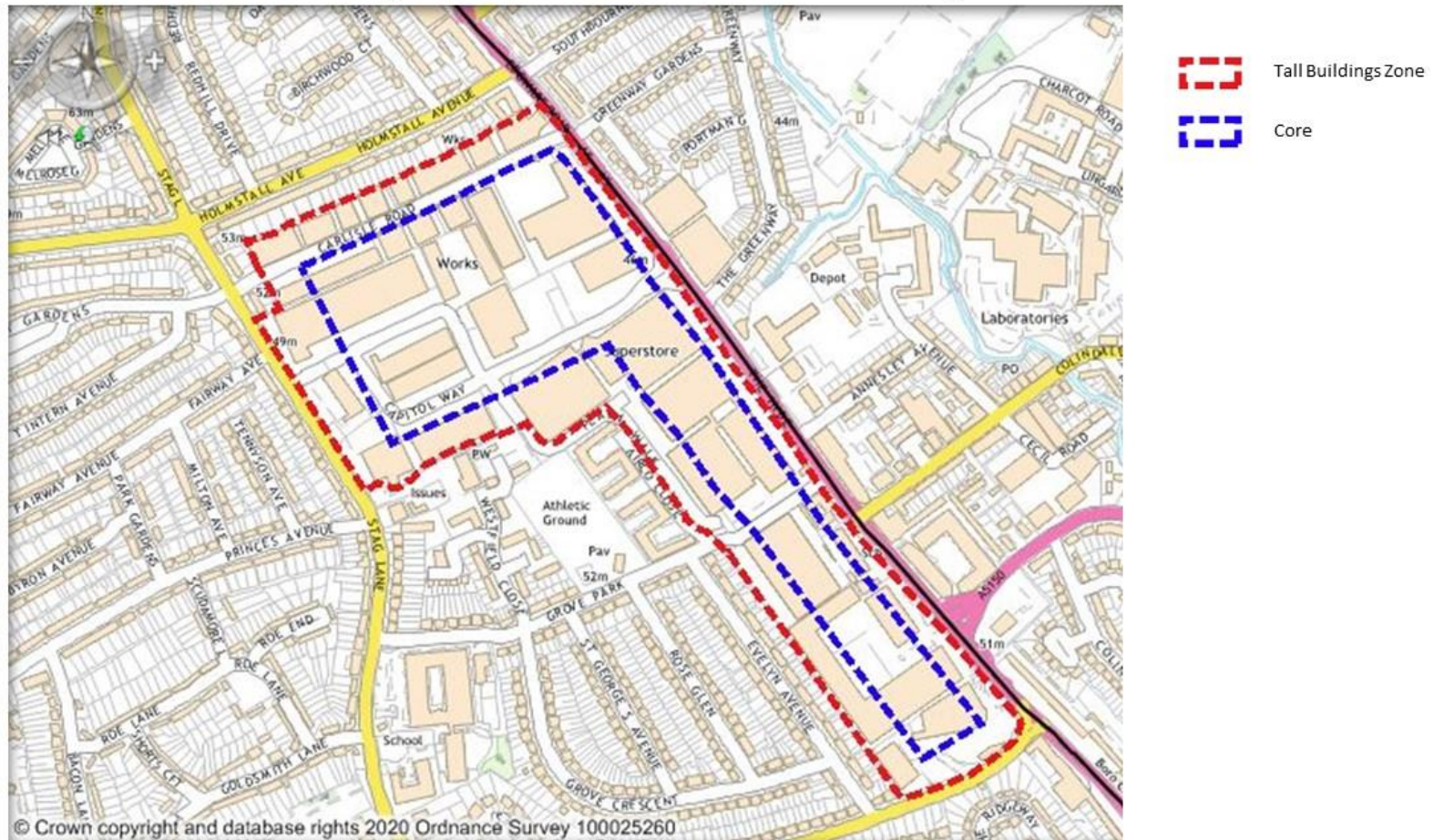
Brent Draft Local Plan Regulation 19 Publication Version Tall Buildings Zone Alperton Eastern Boundary



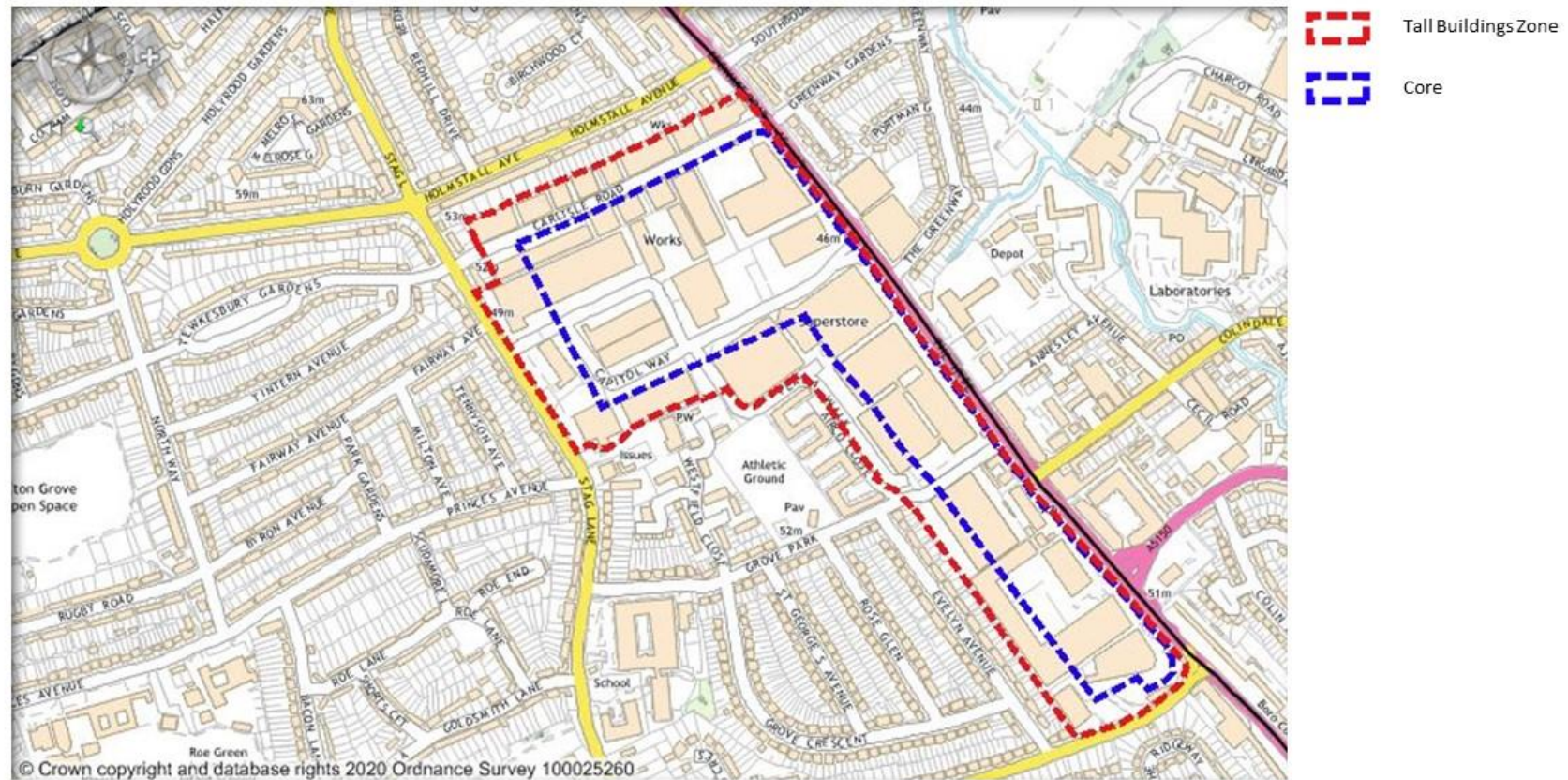
Map Mod 8 Brent Draft Local Plan Submission Version Tall Buildings Zone Alpertor Extended Eastwards To Include Northfields



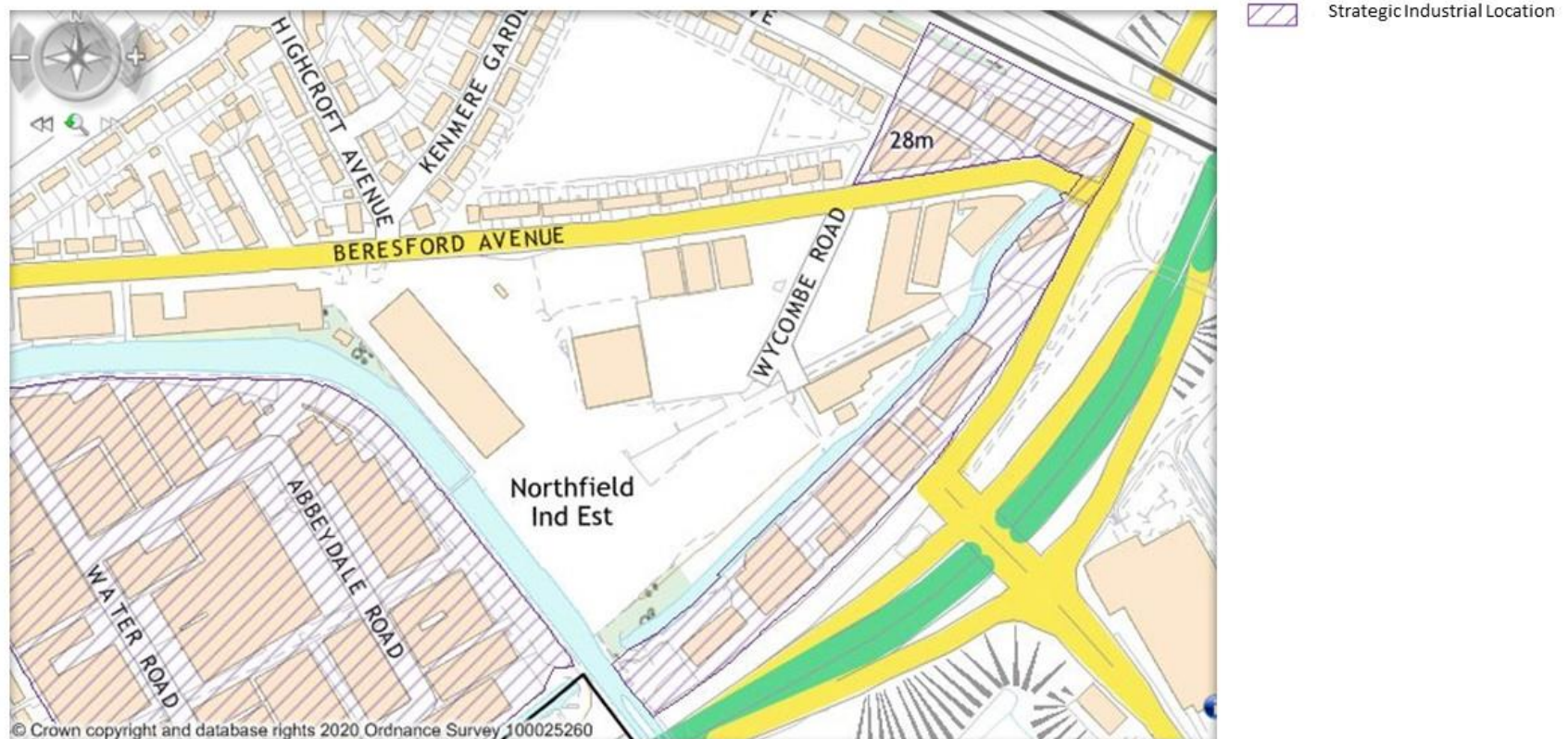
Brent Draft Local Plan Regulation 19 Publication Version Tall Buildings Zone Colindale



Map Mod 9 Brent Draft Local Plan Submission Version Tall Buildings Zone Colindale Core Extended



Map Mod 12 Brent Draft Local Plan Regulation Submission Version Strategic Industrial Location Boundary – Removal of Northfields Where Principle of Residential Has Been Accepted Through Planning Permission 18/0321.



Other modifications to Local Plan supporting documents

	Infrastructure Delivery Plan	Transport, Roads.	Identify any highway schemes related to the M1 that become evident as the evidence base for the London Plan further addresses transportation impacts with inputs from Highways England.	Include information.
	Infrastructure Delivery Plan		Update schedule to include additional infrastructure required prior to adoption of the Plan and for the infrastructure delivery plan to be updated on an on-going basis.	Reflects dynamic nature of the document.
	Historic Environment Placemaking Strategy	Page 24	"...perhaps galvanised by residents' associations, <u>Local History Societies</u> or a neighbourhood..."	Reflects role societies have.
	Historic Environment Placemaking Strategy	Page 25	Objective 3: Work with communities, <u>Local History Societies</u> and residents' associations to thematically identify potential candidates for the Local List, based on the Borough selection criteria.	Reflects role societies have.
	Historic Environment Placemaking Strategy	Page 28 photograph adjacent to 9.11	"3 and 4 <u>5</u> Buck Lane...."	Accuracy
	Historic Environment Placemaking Strategy	Page 36	"Iron age pottery found in 2013 on the site <u>of the former "Blackbirds" public house, underneath the Lidl supermarket</u> Blackbird Hill, Wembley"	Accuracy
	Historic Environment Placemaking Strategy	Page 41	Objective 3: Work with communities, <u>Local History Societies</u> and residents' associations to thematically identify potential candidates for the Local List, based on the Borough selection criteria.	Reflects role societies have.