

Appendix 1

SCHEDULE OF MAIN MODIFICATIONS OF DRAFT BRENT LOCAL PLAN SUBMITTED FOR EXAMINATION IN MARCH 2020

LONDON BOROUGH OF BRENT

This schedule contains all main modifications to Brent Local Plan to submission version for public consultation, which the Inspectors examining the Plan consider necessary for soundness. All proposed modifications and their reference numbers supersede all previous versions proposed by the Council during the examination process.

The following format has been used to denote the modifications:

Underlined bold text = new text proposed for policy compared to submission version

~~Strikethrough text~~ = text proposed for removal compared to submission version

Underline text = new text proposed for justification text compared to submission version

Main Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM1	2 Introduction	Paras 2.14 – 2.17	<p>Layout of the Brent Local Plan</p> <p>2.14 As indicated earlier, the London Plan contains many detailed strategic policies that are also intended for development management purposes. The Greater London Authority considered that this would be helpful so that councils can concentrate on locally specific issues which differentiate their areas from others. The National Planning Policy Framework (NPPF) and draft London Plan both emphasise that there is no need for Local Plans to repeat their policies. The Local Plan therefore follows this advice where it is considered national or London policy provides sufficient policy detail. The Brent Local Plan should be seen as complementary to be read in conjunction with the London Plan, NPPF, National Planning Practice Guidance and London Plan Supplementary Planning Guidance documents.</p> <p><u>The NPPF (paragraph 21) requires local planning authorities to make explicit which policies are strategic in their Local Plan. Accordingly, the Council has used the criteria provided in the NPPF to assess the policies and site allocations contained within the draft Brent Local Plan. The outcome of this assessment is set out in Table 1 of Appendix 6 of this Plan with the assessment, criteria and conclusions shown within Table 2 of the Appendix. Where a policy was considered to meet at least one of the NPPF criteria, it was determined to be a strategic policy.</u></p> <p>2.15 As a result, such the structure of the Brent Local Plan is such that it obviously complements the Good Growth Policies and chapters</p>	<p>Amend text to update position on London Plan adoption.</p> <p>Additional paragraph to clarify the Council's approach to making explicit the strategic and non-strategic policies within the Local Plan, as required by the Framework.</p>

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			<p>of the London Plan. This is shown in Figure 4. The Plan has a brief overview of Brent's characteristics, identifying some of the challenges and opportunities. This sets the scene for the following Spatial Vision for Brent, identifying locally specific examples of how the Good Growth Policies will be delivered in Brent either across the borough or through specific areas/ sites. In recognition of the fact that the borough is not homogenous but is made up of a series of smaller places, the Plan splits the borough up and focuses on 7 'Places'. The extent of these Places is loosely based on a scale that is likely to be more locally relevant taking account of a mixture of town centres that exert an influence within them, plus their character and clearly defined physical features which might effectively separate them from other identified Places.</p> <p>2.16 For each of these Places there is an overview of matters such as physical features that define its boundary, a high level analysis of its current attributes, such as town centres, culture and character, transport, employment and education. The challenges and opportunities of the Place are set out. This helps inform a vision for the Place and then the Policy for matters such as culture and character, transport, employment and education, and town centres. In addition, key Site Allocations are set out.</p> <p>2.17 The Plan then sets out a general position statement in relation to new development in the borough, before using the same chapter headings as the draft London Plan to set out locally specific Brent policies on these matters.</p>	

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MM2	3 Brent Characteristics	3.17, page 20	<p><i>Amend sentence of para 3.17 to read:</i></p> <p><u>However, to support new residential development, current projections indicate a new primary school will be required in Wembley Park by 2023. There are however projected shortages of space for secondary pupils which will require provision of the equivalent of two additional secondary schools by 2023/24.</u></p>	To ensure plan accurately reflects the planned provision.
	3 Brent Characteristics	3.19, page 21	<p><i>Amend latter part of para 3.19 to read:</i></p> <p><u>In terms of indoor sports facilities, the Council's Indoor Sports and Leisure Needs Assessment identified provision is significantly below needs. Swimming pools are between ¼-½ of the provision per head of population in adjacent boroughs¹⁰. 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></p>	To ensure the plan accurately reflects the evidence base.
	3 Brent Characteristics	3.32, page 25	<p><i>Amend last part of para 3.32 to read:</i></p> <p><u>It however is severely congested at peaks times. It has significant adverse impacts on communities in terms of severance, pollution and noise. Its will be used as the boundary of the extended Ultra-Low Emissions Zone (ULEZ) to be introduced in 2021 is unclear in terms potential changes on these adverse impacts. 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></p>	To provide greater clarity on impacts of ULEZ on air quality.

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MM3	4 Development Vision and Good Growth in Brent	How Will Good Growth In Brent be Delivered?, page 28-29	<p><i>Amend to read:</i></p> <p>How will Good Growth in Brent Be Delivered?</p> <p><u>4.1 4.37</u> The London Plan includes six Good Growth Policies Objectives that set out the fundamentals on which development in London should deliver. In Brent highlights of how these will be addressed in relation to places <u>and subject chapters in supporting delivering the development vision and good growth are:</u></p> <p>1. Strong & Inclusive Communities</p> <ul style="list-style-type: none"> a) Reduce spatial inequalities within Brent and incidences of areas with high levels of multiple deprivation by promoting mixed and balanced communities particularly around Wembley, Stonebridge, Harlesden, Neasden and South Kilburn and on council housing estates b) Building on Brent's status as London Borough of Culture 2020 by supporting inclusive places, where ethnic diversity is celebrated and recognised, and places where cultural activities are already concentrated, e.g. Wembley, Cricklewood and Kilburn High Road c) Create a more equal and affordable borough, where the opportunities to access good quality housing, employment, education, digital connectivity and culture are maximised 	<p>Correct numbering to allow better referencing.</p> <p>Relate to the Plan's vision, provide consistency with London Plan, reflect up-to-date housing trajectory, provide reference to Policy BH2/ BD2 /BT1 /BGI1 /BSU11, recognise the importance of indoor and outdoor sports facilities and improving air quality, reflect industrial land evidence base, reflect retail and leisure needs evidence, reflect the need for affordable space.</p>

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			<p>d) Strengthen the existing sense of community by celebrating Brent's diversity, heritage and culture, and creating places where Brent's community can meet</p> <p>e) <u>Ensuring the delivery of a wide range of essential social infrastructures in Growth Areas and across the Brent to support the delivery of sustainable communities</u></p> <p><u>2. Making the best use of land</u></p> <p>a) Prioritising <u>the majority of residential development</u> in new and more efficiently and intensively developed Growth Areas such including Northwick Park, Staples Corner and Neasden <u>Stations</u> and continuing to deliver in those that have already been started, such as in Alperton, Burnt Oak/ Colindale, Church End, South Kilburn and Wembley to enhance environmental quality, and bring benefits to the community;</p> <p>b) Supporting higher density development in Brent's town centres, <u>Intensification Corridors</u> and in areas with good accessibility to public transport,</p> <p>c) encouraging greater access, recreational use and also understanding of ecology in Brent's extensive areas of open spaces, such as the Welsh Harp and Fryent Country Park</p> <p>d) <u>Identifying appropriate areas for tall buildings and change that add quality to and complement Brent's character and sense of place</u></p> <p><u>3. Creating a Healthy Borough</u></p>	

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			<ul style="list-style-type: none"> a) Using the iconic sporting heritage associated with Wembley Stadium to play its part in stimulating greater levels of activity. b) Integrating physical activity back into the everyday lives of residents through promoting safe environments, active travel and improving access to open spaces, sports and leisure facilities. c) Improving physical and mental well-being for borough residents by adopting a health-integrated planning approach d) Reducing health inequalities through focusing on narrowing the gap between the most affluent and the most deprived areas of the 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> f) <u>Improving Brent's air quality overall and particularly in Growth Areas</u> <p>4. Growing a Good Economy</p> <ul style="list-style-type: none"> a) Make better use of Brent's employment <u>industrial</u> land and overall increase its industrial floorspace through a structured approach to deliver industrial-its intensification and land release, where appropriate and also where possible support additional housing/ community facilities through co-location b) Support Brent's priority high streets in adapting to the changing lifestyles, including the way people shop, 	

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			<p>lifestyles and the challenges posed by other large centres in London, <u>with, where appropriate, additional retail and leisure floorspace and supporting Wembley's growth to metropolitan centre status</u></p> <p>c) Promote and support a strong and diverse night-time economy in <u>Wembley, Cricklewood, Kilburn and Wembley Park</u> to contribute to London's role as a 24-hour city</p> <p>d) <u>Delivering a minimum of 2,622 serviced accommodation rooms to support town centre economies, particularly those of Kilburn and Wembley</u></p> <p>e) <u>Protecting existing viable office floorspace and identifying sites within Wembley to provide new high quality office floorspace.</u></p> <p>f) <u>Continue to support Brent's high level of entrepreneurship and small business formation by encouraging new creative industries and affordable workspace</u></p> <p>5. Increasing Efficiency and Resilience</p> <p>a) Reduce carbon emissions by supporting the continued expansion of local and renewable energy systems such as those at Wembley Park and South Kilburn <u>and</u> into other Growth Areas</p> <p>b) Tackle congestion and air quality around the North Circular, improving orbital public transport routes such as the West London Orbital railway scheme <u>and</u> <u>prioritising active travel</u> to provide realistic alternatives to travelling by car</p>	

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			<ul style="list-style-type: none"> c) Reduce the risk of flooding from the River Brent and its tributaries and other sources by putting the right development in the right places and reducing surface water run-off and potable water use d) Provide a safe and inclusive environment around Wembley Stadium and Wembley Arena to support their iconic status for positive memories to be made e) Continue to support Brent's award-winning street tree planting initiatives and greening of the built environment to combat air pollution, flooding, overheating and threats to ecological habitats f) <u>Enhancing the capacity of existing green and blue infrastructure such as Welsh Harp, the river Brent corridor and Grand Union Canal across a range of needs, including recreation, biodiversity and climate change</u> <p>6. Delivering the homes to meet Brent's needs</p> <ul style="list-style-type: none"> a) Housing delivery will be maximised, with sufficient planning permissions to support delivery of <u>more homes than the minimum London Plan housing target of 23,250 between 2019/20-2028/29. A minimum 46,018 dwellings will be delivered for the whole plan period of 2019/20-2040/41 on average 2040 homes a year in the period to 2041</u> to meet principally Brent's housing needs but also those of wider London; b) Providing new homes in truly mixed, inclusive communities across a range of tenures, maximising the provision of affordable homes with a particular 	

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			<p>emphasis on social rented properties, but also more affordable home ownership and improved opportunities for higher quality market rented properties;</p> <p>c) Providing new family housing with at least 25% of new homes being 3 bedrooms or more, recognising that Brent's suburban context provides opportunities for houses as well as flats;</p> <p>d) Meeting the growing need for specialist housing such as the 230 homes for older people per year to accommodate Brent's aging population and others with challenges who may require additional support.</p>	

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MM4	FIGURE 6 Brent Key Diagram	Page 29	<p>Replace Figure 6:</p> <p>KEY</p> <ul style="list-style-type: none"> OPDC Boundary Open Space Growth Areas West London Orbital North Circular Waterways Major Town Centre District Town Centre Local Town Centre 	For clarity, reflect up to date Growth Area housing target and accurate town centre hierarchy.
MM5	DMP1	Page 30	<p>Amend part e) of policy to read:</p> <p>c) provided with the necessary physical and social infrastructure;</p> <p>d) conserving and where possible enhancing the significance of heritage assets and their settings;</p>	For clarity remove contradiction in the policy.

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			<p>e) maintaining or and where possible enhancing sites of ecological importance;</p> <p>f) safe, secure and reduces the potential for crime;</p>	

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MM6	5.1 Central Place	Challenges table, page 43	<p><i>Amend point to read:</i></p> <ul style="list-style-type: none"> No net loss and maximising employment industrial floorspace in new developments, where <u>there is</u> existing industrial use, is required due to Brent being recognised as a provide capacity borough. 	To ensure consistency with London Plan
MM7	5.1 Central Place	Policy BP1, page 45	<p><i>Amend parts of policy to read:</i></p> <p>Character, Heritage and Design</p> <p>a) Tall buildings are appropriate within the Wembley masterplan area tall building zone, taking care to preserve protected views of the stadium and create a high quality new neighbourhood, integrating well with the suburban character of the surrounding area</p> <p>Homes</p> <p>d) <u>Minimum of 13,700 additional homes in the period to 2041, which will be predominantly achieved through</u> residential-led mixed-use development within the Wembley Growth Area will be supported <u>which in total will deliver</u> delivering a total of over 15,000 new homes, principally within the Wembley Park development</p>	To make consistent approach across the housing trajectory, retail and leisure floorspace evidence needs, Local Plan (Policy BD2/BE1), London Plan policies.

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			<p>e) 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</p> <p>Town Centres</p> <p>f) To ensure that the development around the national stadium is compatible and coordinated with regeneration proposals in the surrounding area, and that Wembley town centre, the main focus for new retail and town centre uses in the borough, is expanded</p> <p>g) Planning for the development by 2028¹ of 6,700 2,100 sqm comparison goods retail floorspace by 2028, and 6,100 4,300 sqm of convenience goods retail floorspace, in addition to that already existing and consented, directed towards Wembley and Wembley Park town centres to support their future designation as a single metropolitan centre at the London Plan level</p> <p>h) Providing at least one additional food store of between 1,000 and 2,000sqm</p> <p>i) Diversifying the town centre offer to include more cultural and leisure facilities</p> <p>Employment and Skills</p> <p>j) Encouraging the intensification of existing Strategic Industrial Locations closer to the North Circular Road</p> <p>k) Retaining Introducing a greater significant proportion of employment industrial 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</p>	

¹ Total combined floorspace to be delivered over the Central and South West Places. MM?

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			l) Increasing the supply of modern affordable workplace developments for the arts and creative industries <u>consistent with Policy BE1</u>	
	5.1 Central Place	5.1.19, page 46	While much of this area has a strong suburban character dominated by two storey detached and semi-detached homes built during the early 20th century, the building of the national stadium provided a context for the provision of a concentration of tall buildings. As a recognised transformational area, additional tall buildings are appropriate in the Wembley Growth Area. The taller elements within the area will be consistent with the parameters set out in the Wembley masterplan associated with the outline planning permission 15/5550 for the remainder of Wembley Park. Further guidance on the location and scale of tall buildings in other parts of the Growth Area is set out on the Policies map <u>and policy BD2</u> as supported by the Brent Tall Building Strategy.	For clarity regarding tall buildings policy
	5.1 Central Place	5.1.25, page 47	<i>Amend last sentence of para 5.1.25 to read:</i> For the Wembley town centres, vitality and viability will be enhanced through 6,700 <u>2,100</u> sqm net comparison goods <u>retail</u> floorspace, and 6,400 <u>4,300</u> sqm convenience <u>retail</u> floorspace, diversifying the offer through specialist markets and meanwhile uses.	To set out retail and leisure floorspace needs as reflected in the strategic policy for the Place.
MM8	5.1 Central Place	Policy BCGA1, pg.50	<i>Amend last paragraph of policy to read</i> All developments will achieve the highest design standards. Energy efficient design and renewable energy are encouraged. Development will provide at least 15,000 new homes, supported by infrastructure identified within the Infrastructure Delivery Plan. Anticipated infrastructure will include: <ul style="list-style-type: none"> • Junction improvements • New nursery and primary school at York House • Multi-use community centre 	To provide consistency with policy BGI1 and evidence base of Growth Area open space requirement

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			<ul style="list-style-type: none"> • <u>Open space provision:</u> <ul style="list-style-type: none"> ▪ <u>1 x 2.8ha (7 acres) Local Park</u> ▪ <u>4 x 0.2ha pocket parks</u> ▪ <u>Series of equipped play areas within new developments, improvement to existing open space, creation of informal recreation and good quality public realm</u> ▪ <u>Outdoor sports/ gym and MUGAs</u> • New public open space (7-acre park plus other smaller spaces) incorporating play areas • Improvements to the quality and accessibility of existing adjacent open spaces • Planting new trees • New health facilities • Extension of Combined Heat and Power network 	
	5.1 Central Place	5.1.40, page 50	<p><i>Amend para 5.1.40 to read:</i></p> <p>Wembley Growth Area is the <u>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 Central place and part of the South West Place</u> and certainly is the major contributor to the majority of the change that will occur <u>in this place</u>. The exception to this are the intensification corridors and land that retains its SIL designation. As these changes have essentially already been addressed in the justification for the Place, it is not proposed to unnecessarily repeat them again.</p>	To acknowledge the spatial designation in the London Plan and ensure the plan accurately reflects the extent of opportunity area and impact.
MM9	5.1 Central Place	BCSA1, page 52-53	<p><i>Amend parts of policy to read</i></p> <p>Timeframe for Delivery:</p>	To increase brevity, make consistent approach across the Plan, reflect

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			<p>0-5 1-5 Years 20 5-10 6-10 Years 88 78 10+ 11+ Years 377- 408</p> <p>Description of Existing Site: Site currently comprises a Kwik Fit, Public House and ASDA supermarket with associated carpark and four-pump petrol station. These are for the most part single storey buildings with large areas of car parking. The site is located approximately 200m northeast of Wembley Park Station and is bordered by the A4088 Forty Lane to the north, commercial properties to the south west and a retail parade and by residential development to the south and east. <u>It is immediately adjacent to the Barn Hill Conservation Area and the Grade II Listed Lycee International De Londres (former Brent Town Hall).</u></p> <p>PTAL Rating <u>4-5 (current)</u>, 5-6a (2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site forms part of Wembley Park Town Centre, <u>the Wembley Opportunity Area</u> and sits within the wider Wembley Growth Area, making it suitable for residential development. • The site is not within a Conservation Area or Archaeological Priority Area, however it is immediately adjacent to the Barn Hill Conservation Area and the Grade II Listed Lycee International De Londres (former Brent Town Hall). • There are two vehicular access points to the ASDA site from the A4088 and Opportunities <u>exist</u> to create further access points via Wellspring Crescent. 	the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.

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			<ul style="list-style-type: none"> The site is well served by public transport with tube and bus links located approximately 200m southwest of the site at Wembley Park Station, potentially allowing the site to be partly or wholly car free development. Given the presence of filling station on ASDA site and current use on Kwik Fit site, there is a risk of contamination. Where development does come forward As such, a Preliminary Risk Assessment will be required and if necessary, remediation. Given the identified need within the Brent's status as a provide capacity borough, the Council will seek no net loss of employment industrial floorspace and encourage to maximise its provision. The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. There are a number of mature trees across the sites which should be retained where possible. Small part of the site to the south falls under Flood zone 3a and is susceptible to surface water flooding. As the site is over one hectare a site specific Flood Risk Assessment will be required. Developers should provide Development and its associated works should incorporate noise mitigation measures accompanied by a noise management plan to minimise where possible noise levels at source. Any works on site are to comply with the Control of Noise regulations. Any new development should have good sound insulation due to HGV's on site A replacement of public house, pub or community facility D1 use class will be required. Space for potential junction improvements at Forty Lane/Bridge Road may be required. <p>Design Principles</p>	

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			<ul style="list-style-type: none"> • To provide a vertically Mixed-use development incorporating ground floor retail/leisure/commercial uses that maximises the potential of the site. • An active frontage along Bridge Road, Forty Lane, Wellspring Crescent and Chalkhill Road. • Ideally the ASDA store entrance will be closer to Forty Lane and any servicing arrangements not Creating a break in the connection with the rest of the town centre. The potential for through smaller scale ground floor retail/commercial to create a positive frontage that adds to the retail offer and vitality and viability of the town centre should be considered if the supermarket cannot provide the active frontage. • To remove the obvious levels differences along the southern and south eastern boundaries for at least one building width by providing at street level building frontage. • Adjacent development of nine and seven storeys indicate the potential for taller buildings than the traditional suburban context that will need to take account of the setting of the opposite Grade 2 Listed former Town Hall, Barn Hill conservation area and not adversely impact on protected views of the stadium. • The relationship with space required for potential junction improvements need to be considered with a new development. • Retain or provide for sufficient space along the frontages to accommodate large broad leaf trees such as the London Planes that currently exist. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to</u> 	

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			<p><u>ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u></p> <ul style="list-style-type: none"> • <u>Space for potential junction improvements at Forty Lane/Bridge Road may be required.</u> • Green and sustainable infrastructure should be part of the development process and the development. 	
MM10	5.1 Central Place	BCSA2, page 54-55	<p><i>Amend parts of policy to read</i></p> <p>Timeframe for Delivery: 0-5 <u>1-5</u> Years 5-10 <u>6-10</u> Years 644 <u>966</u> 10+ <u>11+</u> Years 322</p> <p>Description of Existing Site The site is currently home to large retail units, a branch of McDonalds and the former Fountain Studios building, and is subject to planning application for a redevelopment known as Fulton Quarter. The site is just south of Wembley Park Station and is bordered by Olympic Way to the East, Wembley Park Drive to the west and Fulton Road to the south. The Wembley campus of the College of North West London sits immediately north of the site. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>PTAL Rating 5-6a (current and 2031 <u>estimate</u>) forecast</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site forms part of Wembley Park Town Centre, <u>the Wembley Opportunity Area</u> and sits within the wider Wembley Growth Area, 	To increase brevity, make consistent approach across the Plan, reflect the housing trajectory, SFRA Level 2, Local Plan and London Plan policies and incorporate essential infrastructure needs.

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			<p>making it suitable for all main town centre uses, plus residential/student accommodation.</p> <ul style="list-style-type: none"> • Meanwhile uses will be encouraged on site on those parts that remain vacant until construction begins. • The existing retail, although out of town in format contributes towards capacity within a town centre. As such, given the limited opportunities to find new large-scale sites to accommodate identified retail needs, any development should seek to maximise re-provision of existing floorspace. The opportunity to accommodate convenience retail in particular needs to be considered. • 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. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • The principle of tall buildings is acceptable on this site, subject to their height not adversely affecting protected views of the stadium. • The frontage along Wembley Park Drive will require a reduction in scale to heights shown elsewhere by new development along Empire Way. • The site is in flood zones 2 and 3a and susceptible to surface water flooding. All proposed development will require a detailed Flood Risk Assessment (FRA). Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2. • The site proposal should take into account the College of North West London site allocation to the north which is also an allocation. Ideally The two sites It should be planned as such one, to that it increases the 	

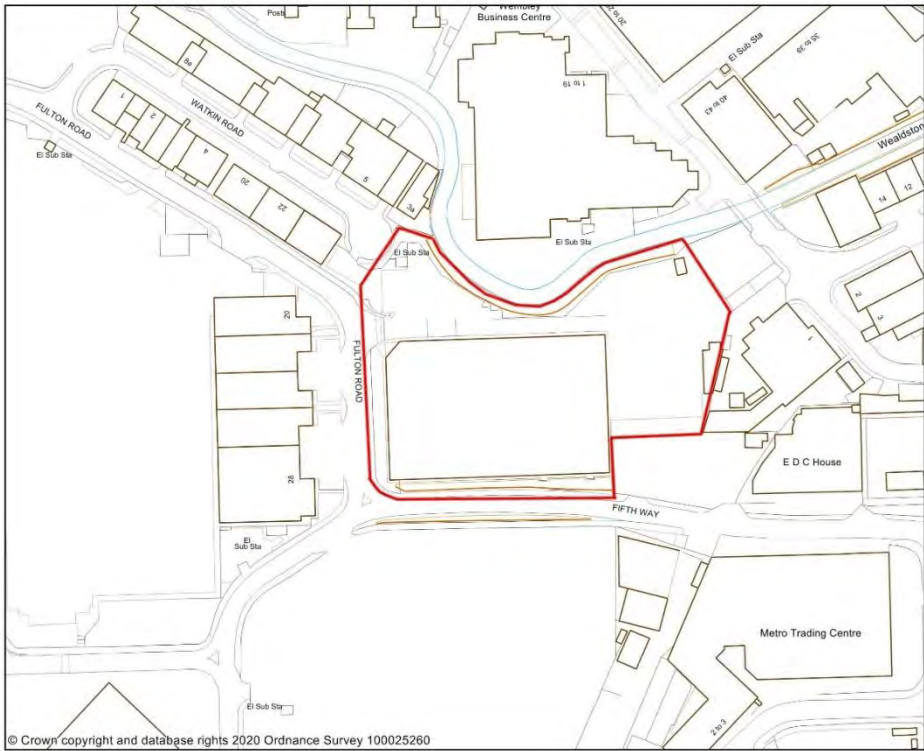
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			<p>potentially efficiency of land use and optimum place making. At the very least development should not compromise the ability of that site to be developed in an efficient manner.</p> <p>Risks No significant long-term risks identified, however leaseholders who operate on the site might be reluctant to end their occupation early. The site is owned by Quintain who are keen to develop to support the wider Wembley Park development.</p> <p>Design Principles</p> <ul style="list-style-type: none"> • Building height and massing should build upon the established rhythm in this part of the Wembley Park development regeneration scheme. It should correspond to the neighbouring buildings and step down in scale towards the west of the site. • Density should reflect the site's high PTAL. • Active frontages should be provided at ground floor level, particularly along Wembley Park Drive, Olympic Way and Fulton Road. • The site should retain an element of permeability to support pedestrian movement from Olympic Way to Wembley Park Drive. • Due to the site's location in Flood Zone 3a, the 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, student accommodation, hotels, and certain community uses towards areas of lowest risk within the site; north west area and southern edge. Density should be varied to reduce the number of vulnerable units in high risk areas. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Significant social infrastructure is being provided nearby as part of the wider Wembley development area Wembley masterplan, therefore no 	

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			<p>specific infrastructure apart from that usually required on large residential sites at this stage.</p> <ul style="list-style-type: none"> • Associated infrastructure including water attenuation tanks, and the diversion of any utilities and services to accommodate the development. • Green and sustainable infrastructure should be part of the development process and the development. • <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> <p>Justification</p> <ul style="list-style-type: none"> • The site's <u>town centre location with excellent public transport access</u> offers substantial development potential as an integral part of the wider Wembley development area. • The Wembley masterplan <u>Given the viability and vitality of uses within this town centre location,</u> suggests that there are a number of mixed use options where creative office and other accommodation can be combined with educational and commercial accommodation at lower levels with residential development in upper storeys. • Proposals should maximise opportunities for development that would benefit from a town centre location with excellent public transport access and the close proximity to bus, rail and underground transport interchanges. 	
MM11	5.1 Central Place	BCSA3, page 56-57	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery</p>	To increase brevity, make consistent approach across the Plan, reflect

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>0-5 1-5 Years -</p> <p>5-10 6-10 Years 80</p> <p>10+ 11+ Years 370</p> <p>PTAL Rating 4-5 (current) 5-6a (2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> Part of the site is within the Wembley Park town centre (Premier Inn). The site is located within the Wembley Opportunity Area. It all sits within and the wider Wembley Growth Area. The Premier Inn site has the potential to accommodate a larger hotel or a hotel and range of other main town centre uses or residential. The remainder of the site along Brook Avenue can accommodate much higher density residential. The site is not within a Conservation Area or Archaeological Priority Area. The site is accessed via Brook Avenue by both vehicles and pedestrians and is well served by public transport, with good tube and bus links close to the site on Bridge Road. as such car free development is likely to be acceptable in this location. The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. Some of the existing dwellings in Brook Avenue are within functional floodplain zone 3a and 3b (surface water and fluvial and tidal) and are at risk of flooding. The redevelopment of these dwellings provides the opportunity to reduce the real risk of flooding to property by bringing development closer to Brook Avenue away from the watercourse. As the site is over one hectare all development will be required to undertake a 	the housing trajectory, SFRA Level 2, Local Plan and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>detailed Flood Risk Assessment (FRA). <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u></p> <ul style="list-style-type: none"> • South of the site is the SINC Grade II Wealdstone brook. The site is recognised as a waterside development, developments adjacent and will be required to contribute towards restoration and naturalisation of the Brook, improve access to the waterway, provide appropriate landscaped setback, enhance water quality and biodiversity. Development should seek to incorporate the potential for fish easement weir behind Elliot Close as part of the potential naturalisation/channel enhancement works. • There are a number of mature trees spread across the site. Where possible these should be maintained and integrated into newly provided open space. • The site is adjacent to a wildlife corridor, where the London Plan Policy 7.19 G6 is applicable. The developers need to take into consideration a positive contribution to the biodiversity, improve access to nature and its recreational function that are important contributing factors to health and well-being of the community. • 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. <p>Design Principles</p> <ul style="list-style-type: none"> • The Premier Inn site provides the opportunity to provide a more defined edge to Wembley Park Drive/Brook Avenue and introduce an active frontage containing main town centre uses. • The site is adjacent to a mixture of residential and commercial buildings up to ten storeys. Within this context, development that is taller than the 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>existing two storey suburban dwellings will be acceptable to the eastern side of the site, stepping down towards the residential buildings to the west of the site which is identified as an intensification corridor along Forty Avenue.</p> <ul style="list-style-type: none"> A minimum of 8m setback from Wealdstone Brook will be sought. Development will be required to <u>positively contribute to the biodiversity</u>, improve access to the waterway and provide an appropriate landscaped setback which may include public open space. The building line should be closer towards Brook Avenue. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Green and sustainable infrastructure should be part of the development process and the development. Brook Avenue/Bridge Road junction improvements are scheduled to be delivered in 2021, at this stage it is not anticipated any further improvements will be sought in relation to this allocation. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> <p>Justification</p> <ul style="list-style-type: none"> The site is located in an area with Excellent public transport accessibility levels and <u>Potential to</u> could improve the public realm as a gateway to the new Wembley Park development. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Given the high levels of development around this site, it would benefit from good access to local shops and services. Redevelopment of this site can contribute towards an improved setting for the Wealdstone Brook, including the delivery of open space and river restoration work to improve ecological diversity and climate change adaptation. 	
MM12	5.1 Central Place	BCSA4, page 58-59	<p><i>Replace Site Plan</i></p>  <p><i>Amend parts of policy to read:</i></p>	To remove the waste site, increase brevity, make consistent approach across the Plan, reflect the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Existing Use Retail Warehouse and car park of Euro Car Parts and adjacent vehicle/skip site for Generay</p> <p>Allocated Use Mixed-use, residential-led development to maximising re-provision of industrial floorspace incorporate maximum of business use floorspace, hotel and potentially student accommodation</p> <p>Indicative Capacity Up to 700 dwellings (residential and student accommodation). Employment space and hotel space to be confirmed. 450 dwellings and industrial space to be confirmed</p> <p>Timeframe for Delivery 0-5 1-5 Years 200 450 5-10 6-10 Years 500 10+ 11+ Years -</p> <p>Area 1.3ha 1.14 ha</p> <p>Description of Existing Site The site is currently in commercial and industrial use with approximately half the site occupied by large sheds and the remainder comprising associated car parking and storage. Wealdstone Brook forms the northern border of the site, with new housing development coming forward to the south and west. Directly east of the site it becomes industrial in nature characterised by small scale low-rise sheds along Fourth Way.</p>	


Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>PTAL Rating 3 (current) 3-4 (2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • <u>The site is located within the Wembley Opportunity Area and Wembley Growth Area.</u> • The site was allocated within the Wembley Area Action Plan for mixed-use development with capacity for 360 dwellings. • The approval of the Wembley Park masterplan and subsequent increases in height and therefore density within that context means that a larger amount of development is now considered appropriate on the site. The site is appropriate for tall buildings, subject to them achieving an appropriate relationship sensitive to its surroundings and not adversely affecting protected views of the stadium. • The site is located within an Air Quality Management Area. <u>As such, development at this site should be air quality positive as it is within the Growth Area.</u> development at this site should achieve to reduce pollutant emissions and minimise exposure. • Given <u>the identified need within the</u> Brent's status as a provide capacity borough, the council will seek <u>the maximum viable re-provision of</u> no net loss of employment <u>industrial</u> floorspace and if a plot ratio of 0.65 is greater, encourage the maximisation of its provision suitable for and B1 (c), B8 and B2 use as a part of any redevelopment of this site. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required and, if necessary, remediation. • North of the site is the SINC Grade II Wealdstone brook. The site is recognised as a waterside development, <u>as such,</u> developers will be required to contribute towards restoration and naturalisation of the Brook, 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>improve access to the waterway, provide appropriate landscaped setback, enhance water quality and biodiversity.</p> <ul style="list-style-type: none"> • Small sections of the site is susceptible to surface water flooding. The site is also adjacent to flood zone 3a (fluvial and tidal) so an appropriate buffer zone along the brook will remove the developable area of the site of any major risks. • <u>A critical trunk sewer runs through this site which would need to be considered.</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. <p>Risks <u>None</u> Existing employment use of the site means that the policy context has changed from when the site was allocated in the Wembley Area Action Plan. As such re-provision of employment space could impact on previously assumed capacity for other uses and development economics.</p> <p>Design Principles</p> <ul style="list-style-type: none"> • The creation of an appropriate buffer between the existing industrial and new non-industrial uses will be required. • Given the <u>permitted</u> neighbouring heights permitted as part of the Quintain masterplan, tall buildings will be appropriate, stepping down towards the eastern edge of the site <u>and</u> not adversely affecting protected views of the stadium. • Active frontage along Fifth Way and Fulton Road. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Biodiversity improvements and flood risk adaptation measures will be sought when development proposals come forward. A buffer strip of at least 10m wide should be retained for a publicly accessible brook side park to allow for a cycle way/footpath, associated landscaping, tree planting and street furniture as agreed in consultation with the Environment Agency and Brent Council. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> <u>Developers would be required to contribute towards restoration and naturalisation of the SINC Grade II Wealdstone brook.</u> Further master planning work will provide additional requirements. Green and sustainable infrastructure should be part of the development process and the development. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> 	
MM13	5.1 Central Place	BCSA5, page 60-61	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use Mixed use main town centre uses, education/campus or residential incorporating flexible retail uses, leisure and community uses (A1, A2, A3, A4, D1, D2) at ground floor level</p>	To increase brevity, make consistent approach across the Plan, reflect the housing trajectory, Local Plan (Policy BT2), London Plan policies,

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Indicative Capacity 253 residential units plus 1,051sqm of flexible retail uses/ if the site comes forward for residential as set out in the planning permission – currently it is anticipated that it will now be where the or College Of North West London campus is the assumed occupier currently so no residential dwellings have been assumed for anticipated in the housing delivery trajectory on this site.</p> <p>Timeframe for Delivery 0-5 1-5 Years 5-10 6-10 Years 10+ 11+ Years</p> <p>Address Olympic Office Centre, 8 Fulton Road, Wembley, HA9 0NU</p> <p>PTAL Rating 5 (current), 5-6a (2031-estimate) forecast</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site falls within Wembley town centre boundary, the Wembley Opportunity Area and forms part of the wider Wembley Growth Area. • The site is suitable for a tall building subject to this not adversely impacting on protected key views of the National Stadium. and does not fall within a Conservation Area or Archaeological Priority Area. • A small part of the site falls under Floodzone 3a and is susceptible to surface water flooding. • Although it has planning permission for principally a residential development, . Its town centre location makes it suitable for office-led 	national policies and incorporate essential infrastructure needs.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>mixed-use development</u> Its town centre location makes it appropriate for a range of town centre uses as well as for any potential CNWL/further/higher education campus.</p> <ul style="list-style-type: none"> • <u>Excellent</u> Public Transport Accessibility Levels are very high for this site, and so parking spaces should be minimal <u>so car free development should be prioritised.</u> • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Public realm improvements associated with removal of vehicle crossings/new access points. • Green and sustainable infrastructure should be part of the development process and the development. • <u>A critical trunk sewer runs through this site which would need to be considered.</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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. Risk of damage to the trunk sewer during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> 	
MM14	5.1 Central Place	BCSA6, page 62-63	<i>Replace Site Plan</i>	Remove part of the site delivered on site.

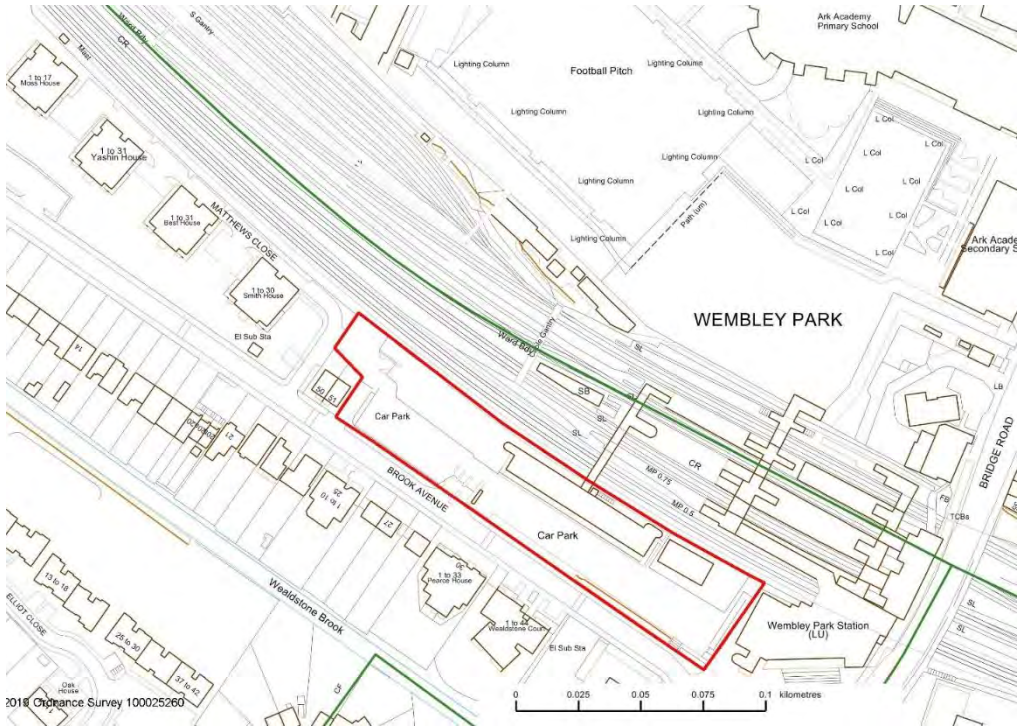
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			 <p><i>Amend parts of policy to read:</i></p> <p>Allocated Use Mixed-use, residential-led development <u>incorporating maximum re-provision of industrial space</u> to the west of the site, adjacent to other schemes coming forward as part of the Wembley Park masterplan transitioning to a more commercial-led use towards the east of the site bordering Wembley Business Centre industrial estate.</p>	To increase brevity, make consistent approach across the Plan, reflect the housing trajectory, SFRA Level 2, Local Plan (Policy BE3), London Plan policies, national policies and incorporate essential infrastructure needs.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Indicative Capacity Assumed 1000 dwellings on basis of density of existing permissions prior to more detailed assessment, 717 plus employment industrial floorspace at ground floor</p> <p>Timeframe for Delivery 0-5 1-5 Years 500 229 5-10 6-10 Years 350 10+ 11+ Years 150 138</p> <p>Planning History 17/2782 – approved application for the demolition of Parkwood House to provide 113sqm affordable workspace plus 283 bedroom student accommodation within a part 13 and part 17 storey building. Under construction. Part of the site: 18/3381 approved application and under construction - Demolition of existing buildings and redevelopment of the site to provide 219 residential units and 584.6sqm of affordable workspace (Use Class B1(a)) on ground floor, in a new building ranging between 2 and 23 storeys together with associated infrastructure works including private and communal space, car parking, cycle storage and public realm improvements.</p> <p>PTAL Rating 4 (current and 2031 estimate) 2031 forecast – PTAL</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • <u>The site is located within the Wembley Opportunity Area and</u> The site falls under Wembley Growth Area. • The approval of the Wembley Park masterplan and subsequent increases in height and therefore density within that context means that a larger amount of development is now considered acceptable on the site than was identified in the Wembley Area Action Plan. The site is appropriate for 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>tall buildings, subject to them being lower than the adjacent approved Wembley masterplan parameters <u>of sites to the south, and</u> not adversely affecting protected views of the stadium or the residential amenity of the occupiers of North End Road.</p> <ul style="list-style-type: none"> • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required and, if necessary, remediation. • The site falls within Flood Zones 3a (Surface, Fluvial and tidal). A Flood Risk Assessment will be required as part of any development coming forward. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • Wealdstone Brook runs along the northern boundary of the site and is designated as a Grade II Site of Interest for Nature Conservation (SINC) of Borough Importance. • Although the loss of existing employment industrial land was considered appropriate in the WAAP, Brent's London Plan 'provide capacity' status for employment. <u>Given the identified industrial land need within the borough,</u> means that employment <u>the maximum viable replacement industrial</u> floorspace at least on the ground floor of 0.65 plot ratio or existing floorspace whichever is the greater will now be sought <u>in developments</u> as part of the redevelopment of the site. • 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 principle', potentially through incorporation of more commercial uses to ensure the potential activities within the Wembley Business Centre is not compromised. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> 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. <p>Design Principles</p> <ul style="list-style-type: none"> Tall buildings will be acceptable taking into account need to mediate between heights of the adjacent Wembley masterplan development sites plus Parkwood House, Apex House and Amex House and Empire Court. Proposed development must ensure it does not adversely affect the ability of other plots within the allocation to maximise their own development potential. Particular attention must be paid to the relationship between developments on the north and south sides of Watkin Road. Active frontages along Fulton and Watkin Road at ground floor level will be sought. Where possible existing trees should be maintained and new trees should be planted within the new development. Flood mitigation should not compromise a high quality deliverance of public realm and interface between street and ground floor use. Development should bring forward an improved setting for Wealdstone Brook including the delivery of open space, potential for increased access and river restoration work to improve ecological diversity and climate change adaptation. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Green and sustainable infrastructure should be part of the development process and the development. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> A vehicular link on the eastern end of the site between Fulton Road and Watkin Road might be required to improve the efficiency of access for service vehicles. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> <p>Justification</p> <ul style="list-style-type: none"> The site is located in an area with Good public transport accessibility levels and <u>Potential to</u> could improve the public realm as a transition from the new Wembley Park development to the industrial land located east of Wealdstone Brook. Given the high levels of development around this site, it would benefit from good access to local shops and services. 	
MM15	5.1 Central Place	BCSA7, page 64-65	<i>Replace Site Plan</i>	<p>Site divided into two site allocations and related text moved to new BCSA20.</p> <p>To increase brevity, make clear the future need for potential rail line expansion, make consistent approach</p>

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			 <p>Amend parts of policy to read:</p> <p>Policy name BCSA7: WEMBLEY PARK STATION (NORTH & SOUTH)</p> <p>Existing Use Car parking and office facilities for Wembley Park Station and disused railway sidings</p>	across the Plan, reflect housing trajectory, Local Plan (Policy BE3), London Plan and national policies and incorporate essential infrastructure needs.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Allocated Use Mixed-use residential-led development to include replacement of the existing office space TfL ancillary accommodation</p> <p>Indicative Capacity 456 400 dwellings (300 southern site, 100 northern)</p> <p>Timeframe for Delivery 0-5 1-5 Years 150 5-10 6-10 Years 250 456 10+ 11+ Years -</p> <p>Description of Existing Site The two sites lies to the north and south of the rail line running through Wembley Park Station. The northern site comprises rail sidings associated with Wembley Park Station. The main road access to the site comes from Forty Avenue. To the north there is a nursing home and opposite the site on the other side of Forty Avenue is the Sattavis Patidar Centre. The southern site runs along the south side of the train tracks at Wembley Park Station and currently comprises TfL offices and car parking. Brook Avenue runs along the southern boundary of this site and provides two vehicular access points to the existing car park. The site is bounded by residential development to the south and west. To the south of Brook Avenue there is a mixture of residential blocks up to 10 storeys, two storey detached and semi-detached houses and a Premier Inn, while to the west there is a development of four residential blocks ranging from 5 to 8 storeys.</p> <p>PTAL Rating 5-6a (current and 2031 estimate)</p> <p>Planning Considerations</p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site is adjacent to the boundary of Wembley Park Town Centre. <u>The site is located within the Wembley Opportunity Area</u> and sits within the wider Wembley Growth Area, making it suitable for residential or mixed-use development. The site contains no designated heritage assets however Development must ensure that it does not impact on the protected view of Wembley Stadium from Barn Hill Open Space. Access to the northern parcel of land is constrained and so development will likely be of a lower density than that on the southern parcel. There is a row of mature trees along the site boundary on Brook Avenue which ideally should be retained. The site to the south is adjacent to a wildlife corridor, where the London Plan Policy 7.19 is applicable. The developers need to take into consideration a positive contribution to the existing ecology, biodiversity, improve access to nature and its recreational function that are important contributing factors to health and well-being of the community. Future development will mitigate potential noise and vibration from the nearby train tracks. The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area 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. Sufficient replacement on-site parking should be provided on site to meet any of the operational needs required by the station and not cause unacceptable impacts on the surrounding residential areas through displacement of user parking. 	

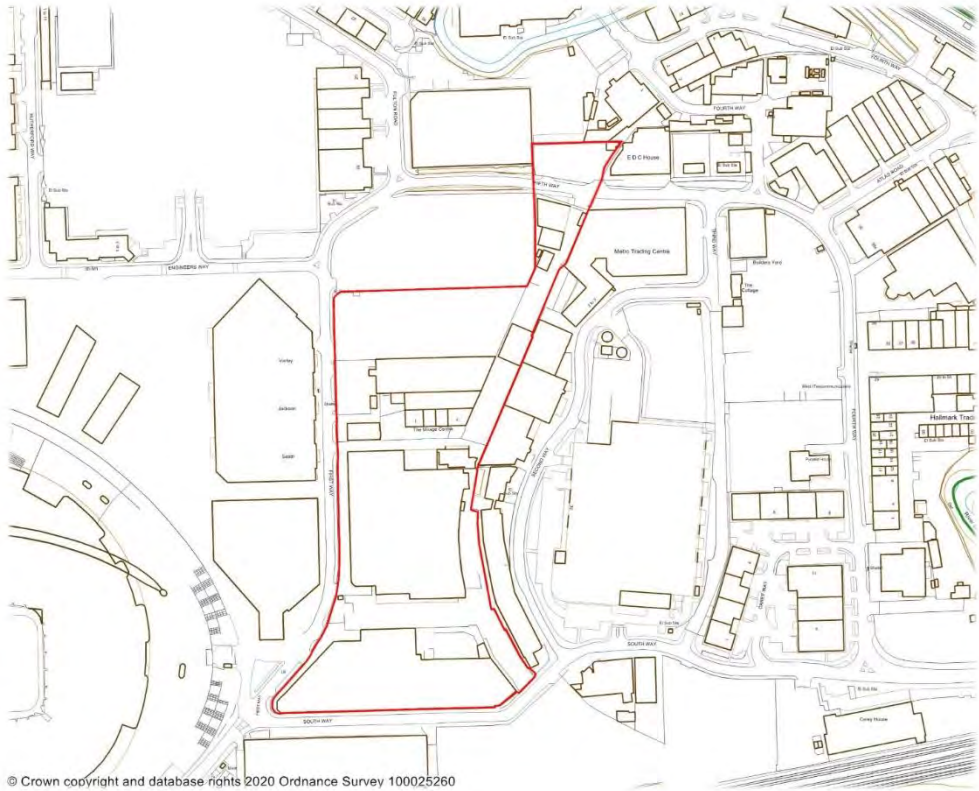
Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Risks</p> <p>Site is considered available and developable; no significant risks identified.</p> <p>Design Principles</p> <ul style="list-style-type: none"> • The northern part has better ecology now than what existed when it was in full time use, thus consistent with its identification as a wildlife corridor is required to address existing ecology through good design. The northern parcel of land will be developed at a lower density than that currently opposite to the south of the railway on Matthews Close. Building height should take reference from the surrounding three and four storey residential and commercial uses. Buildings may step up to four or five storeys however the northern site is not suitable for tall buildings of a significant scale. • The southern site is adjacent to a mixture of residential and commercial buildings. Up to ten storeys will be considered acceptable to the western side of the site stepping up slightly directly adjacent to the station (all subject to impact on protected views of the stadium). • A contemporary design will be supported, and Links should be established between this site and others coming forward as part of the wider Wembley Park development regeneration scheme to ensure this development is successfully integrated integration with the surrounding schemes coming forward over the Local Plan period. • Active frontages will be provided along Brook Avenue with substantial soft landscaping to create defensible space for residents. • Sufficient set back from the railway lines will be required to assist in mitigating against potential adverse impacts of train movements/engineering works. <p>Infrastructure Requirements</p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Green/blue and sustainable infrastructure should be part of the development process and the development. <u>The development should not compromise the ability to add potential platforms at Wembley Park station on the Chiltern Line Aylesbury Branch.</u> <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> <p>Justification</p> <ul style="list-style-type: none"> <u>Consistent with</u> London Plan Policy H1 the site is a states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, in particular through the redevelopment of sites around transport hub and mixed-use redevelopment of car parks. Other recent developments along Brook Avenue suggest that the site can be intensified to provide a mixed-use scheme which co-locates TfL's commercial space with a significant number of new dwellings. The site has excellent access to public transport and local infrastructure including shops and green spaces. The council needs to ensure continued provision of employment space so will seek its retention on this site. 	
MM16	5.1 Central Place	BCSA8, page 66-67	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity 2180 <u>2260</u></p>	To increase brevity, make consistent approach across the Plan, reflect housing trajectory, Local

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Timeframe for Delivery NE01/02, NE03, NE04/05/06 0-5 1-5 Years 468 5-10 6-10 Years 17122260 10+ 11+ Years</p> <p>Description of Existing Site The site forms the North Eastern Lands section of the Wembley masterplan and is currently occupied by a small number of industrial warehouse units to the east and temporary office facilities and playing pitches. The majority of the site is currently covered by car parking associated with Wembley Stadium. The site boundaries are formed by Engineers Way, Fulton Road and Rutherford Way, with plots of land adjacent to this site also under construction or planned to come forward for development either as part of the Wembley masterplan or as standalone schemes.</p> <p>Planning History Forms plots NE01-06 as well as the northern section of the new park planned for the area part of application 15/5550, a hybrid planning application for the redevelopment of land around Wembley Stadium.</p> <p>PTAL Rating 3-5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is made up of plots NE01-06 of the approved Wembley masterplan as well as the northern section of the new park planned for the area. 	Plan (Policy BE3), London Plan, and incorporate essential infrastructure needs. Also reflects Secretary of State's London Plan modification directions.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site falls just outside Wembley Town Centre boundary however it does sit within the Wembley Opportunity Area and wider Wembley Growth Area, making it suitable for residential led mixed-use development. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets. The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. Given Brent's status as a provide capacity borough, the identified need within the borough, should the parameters of the existing outline need to be reviewed or a full application received the council will seek to ensure no net loss of the remaining employment maximum industrial floorspace and encourage maximisation of additional reprovision. The site falls within the Tall Building Zone was identified as such it is suitable for tall buildings in the Wembley Area Action Plan and will be home to the tallest building in the proposed development, signalling the northern entrance into the park. Small part of the site to the south falls under Floodzone 3a and is susceptible to surface water flooding. As the site is over one hectare a site specific flood risk assessment will be required. 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. <p>Design Principles</p> <ul style="list-style-type: none"> Scheme should be designed in line with principles set out in planning application 15/5550. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> <u>Building height and massing should respond to surrounding development coming forward as part of the Wembley Park redevelopment. The massing set out as such to protect the views of the stadium. The ground floor should provide an active frontage on Rutherford Way/Fulton Road and Engineers Way.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Significant infrastructure is being provided throughout the masterplan area. This site should provide the northern section of the planned new 7-acre park Green and sustainable infrastructure should be part of the development process and the development. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> 	
MM17	5.1 Central Place	BCSA9, page 68-69	<p><i>Replace Site Plan</i></p>	<p>Site boundary changed to add the waste site from BCSA4 to the North.</p> <p>To increase brevity, make consistent approach across the Plan, reflect housing trajectory, Local Plan (Policy BE3), London</p>

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			 <p>Amend parts of policy to read:</p> <p>Allocated Use Residential-led mixed-use development, including student accommodation/ education and business industrial.</p> <p>Indicative Capacity</p>	Plan, and incorporate essential infrastructure needs. Also, incorporate Secretary of State's London Plan modification directions.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>1312</u> 1200 dwellings</p> <p>Timeframe for Delivery 0-5 <u>1-5</u> Years 419 5-10 <u>6-10</u> Years 500 10+ <u>11+</u> Years 393</p> <p>Area 4.42ha <u>4.58ha</u></p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> The site currently Comprises low-rise industrial units although there is an emerging taller, residential and commercial character with the UCFB campus building approved for the old Canon industrial units and the under construction Kelaty House adjacent to the north. The site is Bounded by First Way to the west and Second Way to the east. The site was previously allocated for development in the Wembley Area Action Plan, and has come forward in part for mixed-use residential-led schemes. <p>PTAL Rating 1a-3 (<u>current and</u> 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site falls outside Wembley Town Centre boundary however it does Sits within <u>the Wembley Opportunity Area and</u> the wider Wembley Growth Area, making it suitable for residential <u>led mixed-use</u> development. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • The site was identified as sensitive to tall buildings in the Wembley Area Action Plan and <u>The site falls within the Tall Building Zone as such it is suitable for tall buildings although</u> it should come forward at lower heights than those buildings further west towards the stadium. • New development should demonstrate that if providing non-residential use then the delivery of the equivalent of 1200 dwellings will be accommodated within the site. • The site has a low PTAL although it stands to benefit from better connections to the high levels of surrounding development and is within close walking distance to two rail stations. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Some land within the site will be required for highway improvement measures to South Way/First Way. This is part of the Wembley transport improvements around Wembley Industrial Estate and the two-way working. • Prior to its Wembley Area Action Plan allocation, the site was formerly Strategic Industrial Land. It still contains numerous occupied business <u>industrial</u> premises. Notwithstanding the acceptability of residential on site, <u>Given the identified need within the borough,</u> Brent's status as a 'provide capacity' borough in the London Plan means that <u>the</u> maximum re-provision of business <u>industrial</u> uses at ground floor level should be undertaken as part of development. • <u>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> • 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 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p> <p>Design Principles</p> <ul style="list-style-type: none"> • Development on this site should provide master planning showing <u>a</u> transition of heights and mediate between the taller schemes coming forward immediately east of the stadium and the Strategic Industrial Land that makes up Wembley Stadium Industrial Estate. • As its adjacent to what will remain as industrial sites, <u>Development should adopt the 'agent of change principle' and not undermine industrial premises operation.</u> produce a Noise Management Plan and take into consideration noise mitigation in design. • Developments within this allocation must ensure they provide <u>Provision of high quality public realm and</u> strong east-west pedestrian and cycling connections through the site to link routes <u>delivered adjacent to the stadium</u> to future development to the east between First Way and Second Way <u>to the</u>. This should be consistent with the pedestrian routes provided the development coming forward through Wembley Masterplan 15/5550 development, north and south of the Dhamecha. • Developments must take care to ensure they do not compromise the ability of other sites within this allocation to make the most efficient use of land possible at a later date. • They will also need to provide a successful transitional area between them and the adjacent industrial uses on Second Way. • Where business <u>industrial</u> premises are being provided on-site, the design should support the amenity of both residential and business <u>industrial</u> uses to ensure their long term compatibility. • Development should provide active frontages along First Way and South Way and the planned pedestrian routes north and south of Dhamecha. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The proximity to the national stadium and coach/car parking means acceptable noise mitigation measures will be required to address event day activity. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Small parcels of land at the north and south of the allocation along Fifth Way and South Way may will be required for future road improvements. High quality public realm link from west to east between First Way and the site's eastern boundary to provide for future connections through to Second Way. Green and sustainable infrastructure should be part of the development process and the development. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> <p>Justification</p> <ul style="list-style-type: none"> The site is located at the edge of the current approved masterplan for the land around wider Wembley development adjacent to the Stadium and provides a key opportunity to mediate between the tall residential blocks to the west and the low-rise industrial units which make up Wembley Stadium Industrial Estate. The impermeable nature of this site currently does not provide good east-west links to the stadium. There is an opportunity to strengthen these links by creating new streets and pedestrian paths between First Way and Second Way. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Whilst previously allocated for non-industrial uses, given Brent's provide capacity status, consideration needs to be given to potentially accommodate business premises in the redevelopment of sites that takes place. 	
MM18	5.1 Central Place	BCSA10, page 70-71	<p><i>Amend parts of policy to read:</i></p> <p>Existing Use Commercial office space and associated Car parking</p> <p>Allocated Use <u>Nursery and</u> 3FE primary school</p> <p>Timeframe for Delivery 0-5 <u>1-5</u> Years 5-10 <u>6-10</u> Years 10+ <u>11+</u> Years</p> <p>Description of Existing Site The majority of the site is comprised of car parking formerly associated with York House. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>Planning History</p>	To increase brevity, refer to recent planning application, make consistent approach across the Plan, reflect housing trajectory, Local Plan, London Plan, and incorporate essential infrastructure needs.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Site forms part of application 15/5550 for the redevelopment of land around Wembley Stadium. This plot is shown as YH1. 18/0204 granted permission for a 3 form primary school with 60 place nursery.</p> <p>PTAL Rating 5-6a (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site falls outside sits inside Wembley Town Centre boundary, however it sits within the Wembley Growth Area and Wembley Regeneration. Wembley Opportunity Area. A primary school is required as part of the Wembley Park development. This site is the preferred location and has full planning permission. It is anticipated that the school will be required once sufficient occupation of Wembley Park creates the need for additional school place capacity. If the site is not required for the school, then alternative suitable provision will be required elsewhere within the Wembley Growth Area <u>before this site is considered appropriate for alternative uses. Should this be the case, the site's location within the town centre boundary would make it suitable for a range of town centre uses, community uses and residential development.</u> The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. 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. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Infrastructure Requirements</p> <ul style="list-style-type: none"> The Wembley transport improvements for York House Gyratory will be delivered in conjunction with the developer of the school. Green and sustainable infrastructure should be part of the development process and the development. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> 	
MM19	5.1 Central Place	BCSA11, page 72-73	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 0-5 <u>1-5</u> Years - 5-10 <u>6-10</u> Years 155 10+ <u>11+</u> Years -</p> <p>PTAL Rating 6a (<u>current and</u> 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site falls outside <u>inside</u> Wembley <u>Park</u> Town Centre boundary, however it sits within the Wembley Growth Area and Wembley Regeneration. <u>Wembley Opportunity Area</u> <u>Most of</u> the site falls almost entirely within Flood Zones 2 and 3. A Flood Risk Assessment will be required as part of any development coming 	To increase brevity, make consistent approach across the Plan, reflect housing trajectory, SFRA Level 2, Local Plan, London Plan, and national policies, incorporate essential infrastructure needs.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>forward. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u></p> <ul style="list-style-type: none"> Waterside development must ensure it is in accordance with Local Plan policy BGI1 Green and Blue Infrastructure in Brent. The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. The area site is identified as acceptable for tall buildings, although development has to take account of its location on the edge the Wembley Park masterplan site and the suburban context around Wembley Park Drive and protected views of the stadium. <u>The loss of the site to non-D1 educational uses is on the basis that that the use is being re-provided elsewhere within the borough.</u> <p>Design Principles</p> <ul style="list-style-type: none"> This is a gateway site in that it is one of the main sites viewed when coming out of the Wembley Park station. Building height and massing should build upon the established rhythm in this part of the Wembley Park development regeneration scheme, corresponding to the neighbouring buildings and stepping down towards the west of the site. The design should be sensitive to the protected views of the stadium. Density should reflect the site's high PTAL. Active frontages should be provided at ground floor level, particularly along Wembley Park Drive and Olympic Way. There are a number of mature trees within the site adjacent to the Wealdstone Brook. Where possible these should be maintained and integrated into newly provided open space. <p>Infrastructure Requirements</p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • Significant social infrastructure is being delivered nearby as part of the Quintain masterplan. • Green and sustainable infrastructure should be part of the development process and the development. • The loss of the site to non-D1 educational uses is on the basis that that the use is being re-provided elsewhere within the borough. • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> 	
MM20	5.1 Central Place	BCSA12, page 74-75	<p><i>Amend parts of policy to read:</i></p> <p>Existing Use Industrial/D2 <u>night club</u> /Concrete batching plant</p> <p>Allocated Use Residential-led mixed-use development including business-<u>industrial</u> premises.</p> <p>Timeframe for Delivery 0-5 <u>1-5</u> Years - 5-10 <u>6-10</u> Years - 10+ <u>11+</u> Years 500</p> <p>Description of Existing Site</p>	Incorporate Secretary of State's London Plan modification directions, reflects potential need for highways capacity improvements, increase brevity, make consistent approach across the Plan, reflect housing trajectory, Local Plan (Policy BE3), London Plan policies, incorporate essential infrastructure needs.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>The site currently comprises a mixture low-rise industrial units (one in use as a night club) and a concrete batching plant. It is bound on the northern edge by South Way, to the south is the Chiltern line. To the west is the national stadium, to the north are industrial premises allocated for residential led mixed use development through Policy BCSA9. To the east a multi-storey car and coach park is being constructed for use in association with the national stadium/event days. The site was previously allocated for development in the Wembley Area Action Plan, and part has come forward for the car park under construction. The site is not within a Conservation Area or Archaeological Priority Area and contains no heritage assets.</p> <p>PTAL Rating 2 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site falls outside Wembley Town Centre boundary however it does sit within the wider Wembley Growth Area and the Wembley Opportunity Area, making it suitable for residential led mixed-use development. • The SINC Grade I Chiltern line passes south of the site. The site is also adjacent to a wildlife corridor, where the London Plan Policy G6 Biodiversity and access to nature is applicable. As such, the developers need to take into consideration a positive contribution to the biodiversity, improve access to nature and its recreational function that are important contributing factors to health and well-being of the community. • The site falls within the Tall Building Zone however development was identified as sensitive to tall buildings in the Wembley Area Action Plan and so should come forward at heights consistent with buildings being constructed further west along South Way on sites SW03/04/05 that step down towards the south and from the east to west of the site. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • <u>Tall buildings are acceptable on this site, subject to their height not adversely affecting the protected views of the stadium</u> • The site has a low PTAL although stands to benefit from better connections to the high levels of surrounding development and is within close walking distance to two rail stations. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Prior to its Wembley Area Action Plan allocation, The site was formerly Strategic Industrial Land. It still and contains numerous occupied business <u>industrial</u> premises. Notwithstanding the acceptability of residential on site consistent with the previous WAAP allocation, Brent's status as a 'provide capacity' borough in the London Plan means that no net loss of employment <u>Given the identified industrial floor space need in the borough, the maximum viable amount of industrial</u> floorspace <u>will be required.</u> and the re-provision of B1 (c), B8 and B2 use at ground floor/basement level should be undertaken as part of development consistent with a plot ratio of 0.65. • Given the intensification of development in the area it is likely the concrete batching plant will be an important component to supporting delivery of new homes. Residential development on the adjacent sites (if in advance of the batching site) should be consistent with the 'agent of change principle' and not undermine the operation of that site. This principle should also apply to the operation of the proposed replacement business space provided on site, so that it creates business space that will remain viable for the long term. • The proximity to the stadium, railway and adjacent coach/car parking will require appropriate attenuation measures to deal with noise, vibration and disturbance to create a suitable living environment. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> A two-way road system at South Way/First Way is planned as highway improvements, new development should take this into consideration. As industrial land the site may contain contamination that will need to be satisfactorily addressed to create a safe residential environment. If the business space is provided in a separate building/s to the residential (i.e. not part of a vertically mixed use scheme), this will be required to be built to a standard ready for occupation prior to occupation of the residential development. 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. <p>Risks</p> <ul style="list-style-type: none"> Land is in multiple ownership which may prevent comprehensive redevelopment. Piecemeal development may prevent the most efficient land use. Potential for occupiers to want to remain towards the end or after the end of the Plan period. <p>Design Principles</p> <ul style="list-style-type: none"> <u>The site falls within the Tall Building Zone however</u> the proximity to the stadium means that the height of the development should respect this setting and provide a similar solution to that of development on site SW03/04/05 on <u>further west along</u> South Way, stepping up from the south/railway side and down towards the stadium from the eastern part of the site. The proximity also encourages that design should be sensitive to the protected views of the stadium. 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Active frontages should be created along South Way. ground floor business space may be able to provide this role, particularly if buildings are vertically mixed use. Developments must take care to ensure they do not compromise the ability of other sites within this allocation to make the most efficient use of land possible at a later date. Where business industrial premises are being provide on-site, the design should support the amenity of both residential and business uses to ensure their long term compatibility. Where possible existing trees should be maintained and new trees should be planted within the new development. The proximity to the national stadium and adjacent coach/car parking means acceptable noise mitigation measures will be required to address event day activity. <u>The proximity to the railway will require appropriate attenuation measures to deal with vibration to create a suitable living environment.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Small parcels of land at the on north ern parts and south of the allocation along South Way may be required for future road improvements. Green and sustainable infrastructure should be part of the development process and the development. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Justification</p> <ul style="list-style-type: none"> The site is located at the edge of the Wembley area development current approved masterplan for the land around Wembley Stadium and provides a key opportunity to create a better environment around the stadium meeting housing needs, but also re-providing quality employment industrial space for which there is a great need. The site has a number of environmental challenges particularly related to potential noise which will need to be overcome. The visibility of the development from significant distances away from the south means that a quality development is required that does not conflict with protected views. 	
MM21	5.1 Central Place	BCSA13, page 77	<p>Allocated Use</p> <p>Mixed Use with maximum viable a minimum of 0.65 plot ratio B1 business use, light industrial/ research & development floorspace with the remainder being of main town centre uses or residential</p>	To provide clarity following changes to the Use Classes Order and BE3.
	5.1 Central Place	BCSA14, page 77	<p>Comments</p> <p>Re-provision of D1 community use, plus additional residential uses. Active frontage at ground floor.</p>	Clarity of proposed use consistent with use classes
	5.1 Central Place	BCSA15, page 77	<p>Address</p> <p>Site W10 Wembley Masterplan</p> <p><u>Land west of multi storey car park on South Way west of the National Stadium</u></p> <p>Allocated use</p>	Clarity on location and provide proposed use consistent with new Use classes

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Retail or entertainment and leisure at ground, upper floors B1 office or D2 entertainment and <u>leisure</u>	
	5.1 Central Place	BCSA16, page 77	<p>Address Site NW04 Wembley Masterplan <u>Land north of Engineers Way, between Brent Civic Centre and Olympic Way</u></p> <p>Allocated Use A1-A5, D1 ground, D1, B1/C1/D2 uppers <u>Retail/food & drink/ medical or health services/ crèche, nursery or day centre/ Hotels and hostels/ Learning and non-residential institutions/local community</u></p> <p>Comments Outline consent for A1-A5 and B1/C1/D1 uses and development parameters granted through 18/0968. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u></p>	Provide brevity and clarity of proposed use consistent with new Use Classes, provide a safe development consistent with national policy
	5.1 Central Place	BCSA17, page 77	<p>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.</p>	Policy deleted as conflict with SIL designation where only intensification is allowed.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
	5.1 Central Place	BCSA18, page 77	<p>Address Site W12 Wembley Park Boulevard, Wembley <u>Land between Ibis and Premier Inn, South Way</u></p> <p>Allocated use A1-A4/B1/D1 and D2 uses. <u>Retail/food and drink/offices/ medical or health services/ crèche, nursery or day centre/ Learning and non-residential institutions/local community</u></p>	Clarity on location and provide proposed use consistent with new Use classes
	5.1 Central Place	BCSA19, page 77	<p>Size (ha) 0.3<u>4</u></p>	Factual update
MM22	5.1 Central Place	BCSA20, insert new page	<p><i>Add new policy</i></p> <p><u>Site Plan</u></p>	New policy separated from BCSA7 for Clarity.

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<div></div> <p><u>Existing Use</u> <u>Disused railway sidings</u></p> <p><u>Allocated Use</u> <u>Mixed-use residential-led development</u></p> <p><u>Indicative Capacity</u> <u>100</u></p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Timeframe for Delivery 1-5 Years - 6-10 Years - 11+ Years <u>100</u></p> <p>Address <u>Wembley Park Station, Wembley, HA9 9AA</u></p> <p>Area <u>0.72 ha</u></p> <p>Description of Existing Site <u>The site lies to the north of the rail line running through Wembley Park Station. The site comprises disused rail sidings. The main road access to the site comes from Forty Avenue. To the north there is a nursing home and opposite the site on the other side of Forty Avenue is the Sattavis Patidar Centre. Across the railway line to the south are 4 residential blocks ranging from 5 to 8 storeys.</u></p> <p>Ownership <u>Site owned by TfL</u></p> <p>Planning History <u>No relevant planning history.</u></p> <p>PTAL Rating <u>4 (current and 2031 estimate)</u></p>	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>Planning Considerations</u></p> <ul style="list-style-type: none"> • <u>The site is located within the Wembley Opportunity Area and the Wembley Growth Area, making it suitable for residential, with the potential for mixed-use development along the Forty Lane frontage.</u> • <u>Vehicular access to the site from Forty Avenue could be constrained due to limited visibility and proximity of other junctions. This together with the site's accessibility to public transport may mean a car free development will be desirable.</u> • <u>Consideration of the wildlife corridor on site and development should contribute positively to the existing ecology, biodiversity, improve access to nature and its recreational function.</u> • <u>Future development will mitigate potential noise and vibration from the nearby train tracks.</u> • <u>The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area</u> <p><u>Risks</u> <u>no significant risks identified</u></p> <p><u>Design Principles</u></p> <ul style="list-style-type: none"> • <u>Consistent with the site's identification as a wildlife corridor, the development is required to address existing ecology through good design.</u> • <u>Buildings should mediate between the taller buildings on Matthews Close and the character of development along Forty Avenue and further to the north, however the site is not suitable for tall buildings of a significant scale.</u> 	

Modification Number	Chapter/ Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> <u>Sufficient set back from the railway lines will be required to assist in mitigating against potential adverse impacts of train movements/engineering works.</u> <p><u>Infrastructure Requirements</u></p> <ul style="list-style-type: none"> <u>Green/blue and sustainable infrastructure should be part of the development process and the development.</u> <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> <p><u>Justification</u></p> <p><u>London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, in particular through the redevelopment of sites around transport hubs. Other recent developments opposite the railway sidings along Brook Avenue suggest that the site can be intensified to provide a mixed-use scheme with a significant number of new dwellings.</u></p> <p><u>The site has good access to public transport and local infrastructure including shops and green spaces.</u></p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM23	5.2 East	5.2.8 Challenges and Opportunities, after page 81	<p><i>Insert after para 5.2.8, in table form:</i></p> <p><u>Challenges:</u></p> <ul style="list-style-type: none"> • <u>Limited accessibility to public transport, in particular rail or underground services. Low population density and layout means that opportunities to improve levels of service will only be along principal movement corridors where services already exist.</u> • <u>The North Circular Road and parts of the A5 Edgware Road are a significant physical divider of communities e.g. Neasden as well bringing environmental issues associated with noise, air pollution and poor townscape, particularly around junctions.</u> • <u>The area has only one town centre, Neasden, and a limited number of neighbourhood centres to act as focal points to bring communities together/ create a sense of place. Neasden effectively performs as a neighbourhood centre and faces increasing competition from competing centres in and out of the borough.</u> • <u>The employment areas are relatively low quality and have had limited investment over the years and from a developer perspective are more attractive for housing than new business space.</u> • <u>There is a very high proportion of private rented homes and Houses in Multiple Occupation in the Neasden area.</u> • <u>The southern parts particularly around Neasden are within the top 20% of deprived areas in the country, whilst areas around the North Circular perform only slightly better.</u> • <u>Most sites are in active use, so there are limited obvious significant development opportunities to meet housing, employment and infrastructure needs.</u> <p><u>Opportunities:</u></p>	Whole section added as it was missing in the printed version of the Regulation 19 Plan. Inclusion provides consistency with approach to all other places in the Local Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • <u>The opening of the Thameslink Brent Cross West station in 2022 and proposed creation of a West London Orbital passenger route on the Dudding Hill freight line will significantly improve public transport accessibility in the vicinity of Staples Corner and Neasden station.</u> • <u>A large scale employment area at Staples Corner which is under-intensively used. Potential for a significant new mixed use community, or an extension to Brent Cross Opportunity Area in London Borough of Barnet as a gateway entrance to Brent. The size of the area provides the critical mass to provide associated site specific infrastructure.</u> • <u>Consolidate and improve the offer at Neasden town centre including townscape/ connectivity improvements across and around the North Circular Road/ new street market</u> • <u>Extensive areas of open space, popular and good quality suburban housing with local infrastructure providing a high quality of life which is attractive to families.</u> • <u>To improve the setting and attractiveness of the Welsh Harp as a recreational and wildlife asset.</u> • <u>Using the potential developer interest in residential to invest in and intensify employment premises as well as providing much needed homes and affordable housing.</u> • <u>Existing main public transport movement corridors, e.g. A5 Edgware Road and Neasden Lane/ Blackbird Hill which connect to Growth Areas offer opportunities for intensification.</u> 	
MM24	5.2 East	BP2, Page 84	<p><i>Amend part c) and part d) of 'Character, Heritage and Design' of the policy to read:</i></p> <p>c) Along the intensification corridors of A5 Edgware Road and A4088 Blackbird Hill/Neasden Lane/ Dudden Hill Lane heights typically of up to 15 metres (5 storeys) are likely to be acceptable. Within Neasden town centre this will be 6 5 storeys will also be appropriate.</p>	To provide consistency with Local Plan (Policy BD2, BE1 and BE3), London Plan, set out

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			<p>d) In other areas not subject to site allocations where designated heritage assets will not be adversely affected heights of buildings should go no higher than two storeys above the prevailing predominant heights.</p> <p><i>Amend part e) of 'Homes' of the policy to read:</i></p> <p>e) Minimum of 5,400 additional homes in the period to 2041, the potential residential development for Staples Corner Growth Area (with around 2,200 dwellings) and Neasden Stations' Growth Area (with around 2,000 dwellings) will be determined by their respective masterplans, taking account of the need to support additional employment industrial space on site. Depending on the capacity of these sites there may be specific requirements around different housing types, such as specialist (older people/ supported/ student) housing and build to rent</p> <p><i>Add new part ji) to 'Town Centres' of the policy to read:</i></p> <p>j) Additional residential on upper floors or making efficient use of plots through redevelopment will be supported in these centres to increase local population catchments.</p> <p>ji) <u>Provide up to 500 sqm comparison goods retail floorspace, and 200 sqm convenience foods retail floorspace by 2028. This should be directed toward Neasden town centre.</u></p> <p><i>Amend part k) of 'Community and Cultural Facilities' of the policy to read:</i></p> <p>k) Securing sufficient physical and social Infrastructure on and off site to support the Meeting social infrastructure requirements by securing provision for needs arising from new housing development.</p>	<p>housing delivery, social infrastructure requirements, retail and leisure floorspace needs in this strategic policy for the Place.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>especially the provision of new education, health, cultural and community facilities, notably at</u> Staples Corner and Neasden Stations' Growth Areas, in particular <u>and</u> ensuring the improvement of the Welsh Harp and its setting.</p> <p>l) Securing the retention of the area's religious buildings</p> <p><i>Amend 'Employment and Skills' part of the policy to read:</i></p> <p>Supporting the local economy by:</p> <p>m) Retaining and encouraging intensification of employment <u>light industrial, general industrial and storage and distribution</u> uses at Kingsbury Locally Significant Industrial Site.</p> <p>n) Supporting transformational change of Staples Corner <u>and Neasden Stations</u> to provide co-location/ intensification and a wide range of new business premises fit for modern day occupiers in association with a new mixed use community.</p> <p>o) Retaining/ seeking re-provision of <u>a variety of</u> small scale employment in association with new development <u>and generally throughout the East Place.</u></p> <p>p) Supporting the relocation of College of North West London to a purpose built facility elsewhere in the borough through redevelopment of the existing Neasden site.</p>	
MM25	5.2 East	5.2.16, page 86	<p><i>Amend para 5.2.16 to read:</i></p> <p>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.</u> This will to identify the</p>	To reflect the level of engagement anticipated in the masterplanning process.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			appropriate mix of uses and form of development with a view to improving employment opportunities as well as homes. Such large scale areas are also likely to require some on site social infrastructure which will need to be identified, taking account of needs of the proposed population and capacity/ability to meet needs in existing or extended facilities.	
	5.2 East	5.2.17, page 86	<i>Amend para 5.2.17 to read:</i> In these Growth Areas, land designated as SIL or LSIS in the previous Local Plan will need to address the requirement to, at a minimum replace, but ideally intensify employment-industrial uses too. A range of employment space will need to be provided, although only a very limited focus on office space will be appropriate.	To remove unnecessary reference to previous Local Plan and provide consistency with the London Plan
	5.2 East	5.2.18, page 86	<i>Amend para 5.2.18 to read</i> In advance of adoption of masterplan supplementary planning documents which will seek comprehensive solutions for the areas, small scale release of sites will be resisted, unless it can be shown that it will not <u>prejudice the delivery of a comprehensive masterplan</u> undermine the outcomes of any likely adopted masterplan.	Consistency of wording with policy and throughout plan.
MM26	5.2 East	BEGA1A Insert on page 88 after paragraph 5.1.30	Policy BEGA1A Neasden Stations Growth Area <u>The area around the existing Neasden underground station and a potential West London Orbital overground station will be transformed. In addition to around 2000 homes, the area will through co-location of industrial and other commercial floorspace, provide a major boost to business and employment opportunities. This will deliver a new varied supply of neighbourhood friendly modern industrial premises, studios and managed workspaces for</u>	To provide consistency with format of policies for other Growth Areas in the Plan.

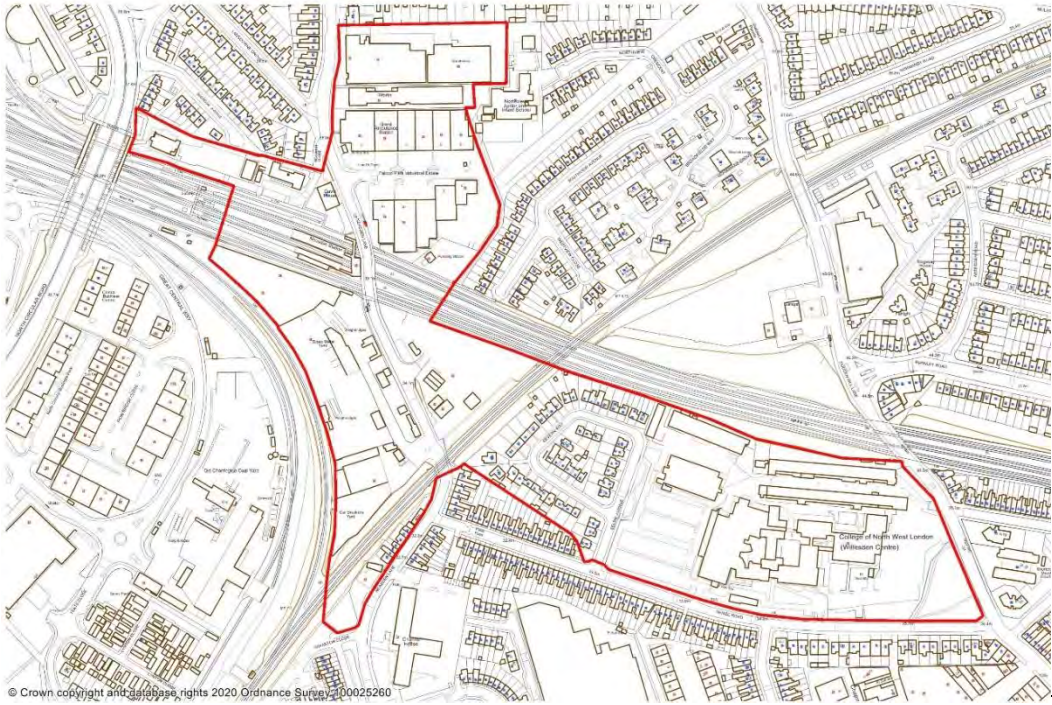
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>local business needs as well as other commercial space to support a mixed use community. Space will be provided for and the development will integrate with a potential new West London Orbital Station accommodated adjacent to Neasden Lane. Tall buildings will be located close to the stations and along the south of the underground line whilst reducing in scale towards its residential edges.</u></p> <p><u>All developments will achieve the highest design standards. Energy efficient buildings using renewable energy and a district heating system will be delivered. Development will be supported by associated infrastructure which will be further drawn out by a masterplanning exercise including:</u></p> <ul style="list-style-type: none"> • <u>Improvements to the public realm, cycling and walking routes along Neasden Lane between the two stations and the Church End and Neasden town centres;</u> • <u>Provision of new public open spaces and improvements to the quality and accessibility of those existing such as on Dudden Hill Lane;</u> • <u>A series of play areas within new developments and open space;</u> • <u>Improvements to Neasden station's accessibility and capacity.</u> <p>5.2.31 <u>The area around Neasden station has a high level of public transport accessibility. This could increase further with the provision of an additional station. This potential station has been identified as part of the West London Orbital scheme, which is a TfL supported infrastructure project. If successful in attaining funding, this will be delivered during the lifetime of the Local Plan. The existing industrial sites around the station have relatively few landowners/ occupiers and are not as intensively used as their accessible location warrants. There is the opportunity to improve efficiency of use through retaining an industrial use with the provision of</u></p>	

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			<p><u>a range of replacement industrial premises co-located with residential properties consistent with London Plan policies. The proposed relocation of the College of North West London to Wembley, provides the opportunity for regeneration of a scale of area to be identified and planned as a Growth Area.</u></p> <p>5.2.32 <u>The area will be subject to a comprehensive masterplan approach which will be led by the Council. This will involve input from landowners, site occupiers, local residents and other relevant parties, such as TfL, at the appropriate time. It will provide further detail on how development can address the wide variety of potentially competing needs, including: needing to provide sufficient industrial floorspace consistent with London Plan policies and Brent's local needs to provide additional floorspace across the borough that can sit alongside a substantial amount of dwellings; creating a positive residential environment on sites in close proximity to railway infrastructure and main roads; providing suitable levels of greenspace and social infrastructure to meet residents' needs and reflecting the gateway status of the area around the station, whilst providing a positive relationship with the lower scale suburban residential surroundings that will remain.</u></p>	
MM27	5.2 East	BEGA2A, insert after page 88 and new BEGA1A main modification before site allocations.	<p><u>Policy BEGA2A Staples Corner Growth Area</u></p> <p><u>The Staples Corner Strategic Industrial Location will be transformed. In addition to around 2,200 homes, the area will through industrial intensification together with co-location of industrial provide a major boost to business and employment opportunities through increased floorspace. This will deliver new varied supply of modern industrial premises, studios and managed workspaces for London's</u></p>	<p>.</p> <p>To provide consistency with format of policies for other Growth Areas in the Plan.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>strategic needs and local business needs as well as other commercial space and social infrastructure to support a mixed use residential community.</u></p> <p><u>Working closely with LB Barnet and the Greater London Authority, the Council will seek to as best possible link it with and complement the Brent Cross Opportunity Area. It will also maximise the potential of the area to benefit from improved public transport connectivity to Central London and beyond provided by the new Brent Cross West Thameslink station and the potential West London Orbital.</u></p> <p><u>The potential for tall buildings will be considered taking account of the need to respect views from Golders Hill through to Harrow on the Hill and not have a detrimental impact on the Brent Reservoir Site of Special Scientific Interest, reducing in scale towards its residential and open space edges.</u></p> <p><u>All developments will achieve the highest design standards. Energy efficient buildings using renewable energy and a district heating system will be delivered. Development will be supported by associated infrastructure which will be further drawn out by a masterplanning exercise including:</u></p> <ul style="list-style-type: none"> <u>• Improvements to the public realm, cycling and walking routes along and across the North Circular Road and the Edgware Road;</u> <u>• Provision of three pocket parks and a series of open spaces and improvements to the quality and accessibility of those existing such as Neasden recreation ground and the Brent Reservoir/Welsh Harp;</u> <u>• A series of play areas within new developments and open space.</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><i>Add justification text after policy to read:</i></p> <p>5.2.33 <u>Staples Corner is a Strategic Industrial Location that plays an important part in meeting for industrial needs, but could perform much better. As a gateway to Brent from wider London, or those coming from further afield from the M1 in townscape terms it presents a poor initial impression of the borough. Although there are some relatively modern fit for purpose premises, many are older poor quality buildings that have received little investment. The area also includes many quasi-retail and other non-industrial uses that reasonably could be located elsewhere, allowing a focus on more strategic industrial needs. In addition, the strategic road network is heavily trafficked and engineered as an 'urban motorway' forming a significant barrier to pedestrian and cyclist movements. Positive recreational and ecological features such as Neasden Recreational Ground and the Welsh Harp/Brent reservoir Site of Special Scientific Interest are also hidden from view, with limited access points.</u></p> <p>5.2.34 <u>On the other side of the Edgware Road in the London Borough of Barnet is the Brent Cross Opportunity Area. 'Brent Cross Town' will be a mixed use area providing a residential community of around 6,700 homes with associated social infrastructure and other features such as 275,000 m² of office floorspace, business facilities for 25,000 employees, other commercial leisure, 14,000m² of indoor sports facilities and 20ha of parks.</u></p> <p>5.2.35 <u>The opening of the new Brent Cross West Thameslink Station in 2022 will improve public transport connectivity to central London and beyond. Potential West London Orbital services will further improve connections to west London and beyond. Staples Corner which has similar characteristics to Brent Cross Opportunity Area shows that potential that</u></p>	

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			<p><u>exists as an employment area, but also to provide additional new homes to meet the Borough's and London's needs.</u></p> <p>5.2.36 <u>The area will be subject to a comprehensive masterplan approach which will be led by the Council. This will involve input from landowners, site occupiers, local residents and other relevant parties, such as TfL, at the appropriate time. It will address how the area can better work in the future. This will seek to improve the amount and quality of industrial floorspace through intensification of sites consistent with London Plan and local plan policies, freeing up land for residential, but also potentially through co-location of industrial and residential uses in a transitional zone between the two predominate uses. It will identify the amount and location of potential dwellings, together with where intensification of industrial uses and the types of industrial uses, and the transition between the two will be considered as part of that process.</u></p> <p>5.2.37 <u>The Council is identifying the location as a Growth Area due to the scale of the opportunity. Given the need to maximise efficient use of land the area has been identified as a Tall Buildings Zone. This reflects the potential scale of development to create clusters and other characteristics of the area, plus the surrounding context of tall buildings being delivered to the north as part of the Hendon estate redevelopment and also as part of Brent Cross. The height and location of development will be considered as part of the masterplan taking into account local protected views from Golders Hill to Harrow on the Hill and seeking to not have an adverse impact on the birds in particular that support the protected status ecological designations of the Welsh Harp/Brent Reservoir.</u></p> <p>5.2.38 <u>As part of the masterplanning the amount of necessary social infrastructure together with other uses to support the new residential community will also be identified, as well as potential enhanced links to the new station, across the North Circular and Edgware Roads and access to and improvements to the extensive open spaces to the north.</u></p>	

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			5.2.39 <u>The size and complicated nature of the area plus the need to engage with occupiers, landowners and other organisations with an interest in the area will mean an effective masterplan will require some time to finalise. As such no reliance has been placed on the site in meeting housing needs in the first half of the plan period.</u>	
MM28	5.2 East	BEGA1, page 90	<p><i>Insert new Site Plan:</i></p>  <p><i>Amend parts of the policy to read:</i></p>	<p>Amend boundary of site allocation so that it covers one contiguous area rather than individual sites.</p> <p>To increase brevity and make consistent approach across the housing trajectory, SFRA Level 2, Local Plan (Policy BH1) and London Plan policies, incorporate essential infrastructure needs, ensure publically accessible routes, reflect Secretary</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Allocated Use Growth Area – Strategic Industrial Location and Locally Significant Industrial Sites subject to co-location and intensification, new passenger railway line infrastructure and residential development.</p> <p>Indicative Capacity Not yet known, Estimated to be 2000 dwellings subject to a masterplanning process which will provide additional clarity. Estimated using standard densities.</p> <p>Timeframe for Delivery 01-5 Years 65-10 Years 101+ Years 0121 735779 12651100</p> <p>Description of Existing Site The site comprises Strategic Industrial Location and Locally Significant Industrial Sites, which incorporate light industry, storage, waste processing and open storage. It also includes a campus of the College of North West London which is relocating to a new site in Wembley. In between is some two storey residential, semi-detached and terraced, some of which is a former council estate. It also includes the Neasden Underground Station, with associated land and land on the West London Orbital rail route. To the south is a petrol station currently in use.</p> <p>PTAL Rating 3-6a both for now and in (Current and 2031 estimate). The potential West London Orbital station at Neasden will increase PTAL levels further.</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> A significant part of the site is Strategic Industrial Land/ Locally Significant Industrial Site (LSIS). The proximity of Neasden station means that consideration of this site for Co-location/ intensification consistent with 	<p>of State's London Plan modification directions. In addition, reflect the new Use Class Order, Compulsory Purchase Order need and existing waste site.</p>

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			<p>London Plan policies is appropriate. The potential for a further station on the West London Orbital line in the area together with the relocation of the College of North West London provide an opportunity for a much larger scale of development to be planned as a Growth Area.</p> <ul style="list-style-type: none"> • This Growth Area will be is subject to a masterplan process to comprehensively identify how the area it can best maintain and ideally increase above a minimum plot ratio of 0.65, for the current SLL and LSIS sites' employment industrial floorspace (predominantly light industrial, general industrial and storage and distribution), plus relate to and provide sufficient space to accommodate the new and existing transport infrastructure as part of a new mixed use community. • <u>The masterplanning exercise will be undertaken involving key stakeholders, landowners and developers to help shape its content from conception to completion.</u> • Until a masterplan has been completed/ adopted by the council, no redevelopments, particularly to industrial sites will be permitted in the area. <u>Developments of non-industrial uses will not be permitted on LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • The disparate land ownership also means that the council will have to be content that the necessary social and physical infrastructure to support the Growth Area's comprehensive change can be provided. This will either be through evidence of landowners working together and having mechanisms such as equalisation agreements in place, or that an alternative is available to the council of capturing sufficient contributions and the necessary land from proposed developments to deliver the infrastructure. On sites where there are a number of ownerships a comprehensive redevelopment of the whole site will 	

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			<p>be expected, rather than a piecemeal approach to ensure the most effective and efficient use of the site.</p> <ul style="list-style-type: none"> • <u>In order to ensure a comprehensive approach to the masterplanning of the site, consideration will be given to the use of Compulsory Purchase Powers where necessary.</u> • It sits within an Air Quality Management Area, as such Development will have to seek to be air quality neutral <u>positive</u> and ensure occupants have an acceptable level of air quality. • The Dudding Hill Line and Jubilee/ Metropolitan Line corridors <u>are</u> Sites of Nature Conservation (<u>SINC</u>) Grade I. <u>Development should not adversely affect their ecological status.</u> • None of the site is within Flood Zone 3 for fluvial flooding. Parts are however in <u>surface water Flood</u> Zone 3. for surface water Much of this is highway land or the rail corridors, although <u>it includes</u> the industrial land south of Neasden station is also susceptible. As such a sequential approach to the location of uses and buildings will be required on these sites to ensure that the <u>no unacceptable</u> risk of flooding on and off site is not unacceptably increased. More detailed assessment will be required through a site specific flood risk assessment. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • The site contains no recognised heritage assets. A locally listed building Shortcroft Mead Court exists on the other side of Dudden Hill Lane. • Neasden Lane and Dudden Hill Lane are reasonably heavily trafficked. They provide reasonable pedestrian routes, but could <u>pedestrians' environment should</u> be improved through wider pavements, tree planting and additional overlooking/ active frontages. Regular bus services run along these roads and provide relatively good public transport accessibility to other locations in Brent. The proposed West London Orbital station will provide wider connectivity with Brent Cross/ West Hampstead though to Hounslow and improve PTAL. <u>High quality pedestrian links should be provided between</u> 	

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			<p><u>the existing and new station. Improvements should also be made to the connectivity with Church End and Neasden town centres.</u></p> <ul style="list-style-type: none"> • It also contains waste facilities which need to be addressed in any development, either off or on-site as there is a need to accommodate these types of facilities in the borough. <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> • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Potential noise associated with the roads and adjacent employment uses will have to be addressed in design of development. • As a transformational area <u>it has been identified in the Tall Buildings Strategy with</u> the area has the potential for tall buildings of over 10 storeys and has been identified as such in the Tall Building Strategy. This potential including Appropriate heights, extent and location of these will be identified in the masterplan and more detailed townscape/ views assessment. The proximity and essentially two storey suburban character of adjacent areas will however require heights to step down towards these edges. • The scale of development also means that a district energy/ heating system should be viable for delivery. • Apart from the railway corridors there is very little of ecological value inside the area; incidental planting is limited. There are a number of trees along the Neasden Lane and Denzil Road, a few are street trees, some form part of planting schemes associated with development and some are self sown. The trees do provide some visual amenity however, their Removal and replacement of trees along the Neasden Lane and Denzil Road with higher quality <u>appropriate</u> specimens of more appropriate trees for the setting would be acceptable. 	

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			<ul style="list-style-type: none"> • The existing open space along Dollis Dudden Hill Lane should be enhanced, or potentially incorporated in another location in the development if this provides better townscape and recreational outcomes. • There is a notifiable pipeline bordering the site that is allocated for the potential station and parts of the residential areas south west of the site. • <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> • <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> • <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> <p>Risks</p> <ul style="list-style-type: none"> • Fragmented nature of land ownership could increase time taken to deliver and if not properly managed a piecemeal rather than comprehensive approach to redevelopment, resulting in a disjointed environment and inadequate infrastructure. • Non-delivery of the West London Orbital line/ associated station. • CPO of properties/ land to deliver the rail infrastructure/ station and regenerate existing housing sites or employment industrial sites. • GLA policy in relation to acceptability of proposals on LSIS SL. <p>Design Principles</p> <p>To be fully drawn out in any future masterplan. Key points to address will be:</p>	

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			<ul style="list-style-type: none"> ensuring successful co-location/ intensification to allow the area to prosper as an employment industrial location; Integration of the new station and links between it and Neasden station within the new townscape; Recognition of the gateway location of the area; Providing higher quality public realm/ pedestrian/ cyclist environment particularly in allowing movement along Neasden Lane and Dollis Dudden Hill Lane; The edges of the development responding to the adjacent suburban housing context; and The significant noise constraints provided by the railway lines and potentially other non-residential uses where the 'agent of change' principle will apply. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site in particular. <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> Improved crossings/ street design/ public realm, green infrastructure, open space and 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> Religious buildings and youth facilities are particular current needs that need consideration as well as specialist housing needs. The College site has sports facilities which Sport England have indicated should be retained/ replaced. Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development 	

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			<p>and upgrades to the wastewater network are likely to be required. 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. Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are Public sewers crossing or are close to the site. The risk of damage during construction must be minimised, and It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p> <ul style="list-style-type: none"> • <u>Prior to adoption of a Masterplan the Council will engage with TfL and Highways England in assessing impacts on the Strategic Road Network from the Growth Area as a whole. This will be based on an individual Transport Assessment using an appropriate method of modelling that will take account of any agreed updates to TfL strategic modelling. Where identified appropriate planning conditions, S106 obligations and Community Infrastructure Levy to deliver measures to mitigate significant impacts on the Strategic Road Network will be required.</u> <p>Justification</p> <ul style="list-style-type: none"> • The site adjacent to Neasden Lane is currently mostly low intensity used Strategic Industrial Land and Locally Significant Industrial Sites LSIS that are adjacent to a station with very high public transport accessibility. This accessibility makes them from a planning perspective a prime site for more intensive use of land. • Given Brent's status as a 'provide capacity' borough for employment space in the London Plan, need to provide for additional industrial floorspace, the SIL and LSIS also provides a vital role in meeting future employment industrial needs. Site owners/ developers are showing interest in bringing sites forward. 	

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			<ul style="list-style-type: none">The proposed West London Orbital route requires appropriate safeguarding of land, but also provides an opportunity to increase the area’s accessibility and potential for regeneration.In addition a large potential development site is the College of North West London’s campus which is to be disposed of to fund a move to Wembley and improved facilities.Taking these factors together there is an opportunity to properly plan a wider ‘Growth Area’. This can comprehensively reconsider the area’s role, to potentially increase its performance as an employment area, but also address other strategic needs, such as using land more effectively, providing new homes, ensure successful delivery of a key piece of transport infrastructure and improve the image of Brent on a gateway site. It also will assist in providing additional population to support Church End and Neasden town centres.							
MM29	5.2 East	BEGA2, page 93	<p><i>Amend parts of the policy to read:</i></p> <p>Existing Use Primarily B1, B2, B8 Light Industrial, General Industrial, Storage and Distribution and Sui Generis Employment Uses, trade counters and some retail, cash and carry, restaurants and residential.</p> <p>Indicative Capacity Not yet known, Estimated to be 2,200 dwellings subject to a masterplanning process which will provide additional clarity—estimate of numbers used at this stage.</p> <p>Timeframe for Delivery</p> <table><tr><td>01-5 Years</td><td>65-10 Years</td><td>101+ Years</td></tr><tr><td>0</td><td>0</td><td>2200</td></tr></table>	0 1 -5 Years	6 5 -10 Years	10 1 + Years	0	0	2200	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BH1 and Policy BD2) and London Plan policies. Incorporate essential infrastructure needs, new UCO, address impacts
0 1 -5 Years	6 5 -10 Years	10 1 + Years								
0	0	2200								

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Description of Existing Site</p> <p>The site covers a multiple of light industrial, heavier industrial and distribution uses, plus other uses such as wholesale and trade counter in differing types of buildings, from the relatively modern fit for purpose industrial to the majority of older poor quality buildings that have received limited investment. a mixture of old and more modern premises of varying heights and quality. As the site is very visible from heavily trafficked roads there are also many wholesale, trade counter type/ showroom operations related to building/ home improvement and car sales, plus self storage and a large Chinese supermarket with a distinctive landmark building. Predominantly buildings are single storey, some contain two storey office elements. There are a small number of three storey and four storey buildings. Exceptionally two former office buildings of 4 and 7 storeys have through permitted development been converted into flats.</p> <p>Some buildings face outwards, others present their backs to streets. Multiple small site ownerships, plus the development of the area in a lot of cases before statutory town planning system came into effect has resulted on some sites in haphazard building placement, poor access arrangements and a poor public realm. As a gateway to Brent and wider London for many people passing through, it gives an extremely poor initial impression.</p> <p>The site It is bounded on the north by the Welsh Harp/Brent Reservoir and Neasden Recreation Ground open spaces. To the east is the A5 Edgware Road, beyond that warehousing and the Brent Cross/Cricklewood Opportunity Area in London Borough of Barnet. To the south and east there is residential development, principally semi-detached or terraced two storey dwellings and some very limited number of 3-6 storey properties.</p>	on existing SSSI, address flood risk, improvement to public transport, reflect Secretary of State's London Plan modification directions.

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			<p>The heavily trafficked North Circular Road cuts through the northern part of the area. It is a very heavily trafficked road. This together With the Edgware Road is essentially designed as urban motorway, elevated in part and it presenting a very hostile 'concrete jungle' pedestrian and cyclist environment, particularly for pedestrians and cyclists. This most intense around the Staples Corner roundabout. There are A number of footbridges across the North Circular. Direct vehicular access to and from these main roads is mostly limited, with more recent developments channelled towards minor roads resulting in. The dual carriageway with barriers means if turnings are missed, longer vehicle journeys diversions are required to return to that point by vehicle.</p> <p>PTAL Rating 3 (Current and 2031 estimate) principally along the North Circular Road, Edgware Road, Oxgate Lane and Humber Road and elsewhere 2 (Current and 2031 estimate) away from these roads. This is both currently and projected in 2031. This does not currently factor in The potential improvements to public transport offered by the West London Orbital station at Brent Cross West will increase PTAL levels.</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is Strategic Industrial Land and is proposed as a Growth Area and for co-location/ intensification consistent with London Plan policies. • It will be subject to a masterplan process undertaken between Brent, Barnet and the GLA. This will to comprehensively identify how the area can best maintain and ideally increase useable employment industrial floorspace (predominantly light industrial, general industrial and storage and distribution). This will representing a minimum 0.65 plot ratio or replacement of the existing amount of employment industrial floorspace, whichever is the greater, whilst potentially providing a new mixed use community. 	

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			<ul style="list-style-type: none"> • Until a masterplan has been completed/ adopted by the council no non-industrial/ residential will be permitted in the area. <u>Developments of non-industrial uses will not be permitted in the growth area until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • The disparate land ownership also means that the council will have to be content that the necessary social and physical infrastructure needed to support the Growth Area's change can be provided. This will either be through evidence of landowners working together and having mechanisms such as equalisation agreements in place, or that an alternative is available to the council of capturing sufficient contributions and the necessary land from proposed developments to deliver the infrastructure. • On sites where there are a number of ownerships a comprehensive redevelopment of the whole site will be expected, rather than a piecemeal approach to ensure the most effective and efficient use of land. • If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered. • Across the Edgware Road within the London Borough of Barnet the area is designated as the Brent Cross Opportunity Area and is subject to substantial growth of housing, employment and retail floorspace. Ideally The masterplanning process will address this wider growth context <u>being delivered in the Brent Cross Opportunity Area</u> and seek to explore the extent to which Staples Corner Growth Area can seek to create a unified place/ townscape between the two. 	

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			<ul style="list-style-type: none"> It sits within an Air Quality Management Area. as such Development will have to seek to be air quality neutral positive and ensure occupants have an acceptable level of air quality. The northern edge is adjacent to Welsh Harp and Neasden Recreation Ground, these have a variety of designations including Metropolitan Open Space, Brent Reservoir Site of Special Scientific Interest, Site of Nature Conservation Grade I and Local Nature Reserve. The Canal and River Trust have been working with the Brent Catchment Partnership on reducing pollution and invasive species and for it to become an attraction to Brent's population of being by water. <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> As such, the Masterplanning also needs to consider the extent to which the potential of this area as a recreational and environmental asset can be enhanced in association with the Staples Corner Growth Area. Natural England have indicated that the height and position of buildings should not adversely impact on the flightpaths and behaviours of breeding wetland birds. None of the site is <u>When taking account of climate change a small part is</u> within <u>fluvial</u> Flood Zone 3 for fluvial flooding. Parts are however in <u>surface water</u> zone 3 for surface water, principally although not exclusively this is within highway land. <u>Appropriate site specific flood risk assessments will need to be undertaken in these locations to ensure no unacceptable risk of flooding on and off-site.</u> The site contains recognised heritage assets in the form of Sites of Archaeological Interest at Oxgate Field (north of North Circular) and is in close proximity to one at Oxgate Farm (Coles Green Road) which is also contains 2 Grade II* listed buildings. Development in or adjacent to these areas will require the appropriate assessments to ensure the assets and their settings are preserved or enhanced. It has no local views. 	

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			<ul style="list-style-type: none"> Potentially parts of the site could benefit from a high quality outlook across the Welsh Harp or if opened up allow better views from the North Circular to it. Views from the Welsh Harp need consideration in terms of design to improve its setting. The North Circular Road managed by TfL as part of the strategic road network is very heavily trafficked, the Edgware Road less so, but still busy. They are managed by TfL as part of the strategic road network. They are a significant barrier to pedestrian movements, which are enabled by foot bridges and traffic light controlled crossings. The Edgware Road in particular at this point appears heavily over-engineered for the volume of traffic that uses it. Improving the pedestrian and cycling environment will be a particular challenge, especially to the carriageway both in terms of not adversely affecting capacity and cost to amending highway structures. Regular bus services along these roads and others provide relatively good public transport accessibility. Brent Cross West Thameslink station will open in 2024 which could also be served by the West London Orbital in 2026. Therefore wider connectivity with London and the south east is potentially very good in the future from this station. Better pedestrian links across the A5 and North Circular Road should be provided. <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. Brent Cross West Thameslink station will open in 2022 which could also be served by the West London Orbital in 2026. There is a need to work with TfL and Barnet Council to provide improved pedestrian and cycle links from the site across the A5 Edgware Road to the proposed new station and wider Brent Cross regeneration area. These are also required across the North Circular Road which is managed by TfL as part of the strategic road network.</u> 	

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			<ul style="list-style-type: none"> Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. Potential noise associated with the roads and adjacent employment industrial uses will have to be addressed in design of development. As a transformational area <u>it has been identified in the Tall Buildings Strategy with the area</u> has the potential for tall buildings of over 10 storeys and has been identified as such in the Tall Building Strategy. This potential including Appropriate heights, extent and location of these will be identified in the masterplan <u>and more detailed townscape/ views assessment.</u> <u>LB Barnet</u> locally protected views <u>from Golders Hill to Harrow on the Hill cross the site. Natural England have indicated for potential impact on the flightpaths and behaviours of breeding wetland birds. These matters should be considered in relation to positioning and location of tall buildings.</u> The proximity and essentially two storey suburban character of adjacent areas <u>together with the ecological status of the Brent reservoir</u> will however <u>also</u> require heights to step down towards these edges. The scale of development also means that a district energy/ heating system should be delivered. There is very little of ecological value inside the area as incidental planting is limited. There are few trees, the best examples being street trees <u>are</u> on Oxgate Lane and a bank of poplars on Coles Green Road, probably from the 1950s. Whilst of significant visual amenity, the poplars due their age and increasing propensity for limbs to fail/fracture are unlikely to be suitable for long term retention in their current form. <u>These should be retained and additional street trees and green infrastructure should be provided.</u> The Brent Open Space Study identified a need for 3 pocket parks and a series of open spaces to meet the needs of the anticipated increase in population in the Growth Area. <p>Design Principles</p>	

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			<ul style="list-style-type: none"> To be fully drawn out in any future masterplan. Key points to address will be: <ul style="list-style-type: none"> ensuring successful co-location/ intensification to allow the area to prosper as an employment industrial location; Recognition of the gateway location of the area; Providing higher quality public realm/ pedestrian/ cyclist environment particularly in allowing movement across roads and linking to Brent Cross West station/ adjacent Opportunity Area in London Borough of Barnet. Opening up views to and enhancing views from Welsh Harp and improved physical connections; and The edges of the development responding to the adjacent suburban housing. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site in particular. Improved crossings/ street design/ public realm, green infrastructure, open space and public transport accessibility. Religious buildings and youth facilities are particular current needs that need consideration as well as specialist housing needs. Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. and upgrades to the wastewater network are likely to be required. 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. Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are Public sewers crossing or are close to the site. The risk of damage during construction must be 	

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			<p>minimised, and It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</p> <ul style="list-style-type: none"> Highways England has identified that development should not significantly impact on the operation of the M1 motorway. <u>Prior to adoption of a Masterplan the Council will engage with TfL and Highways England in assessing impacts on the Strategic Road Network from the Growth Area as a Provide sufficient clarity on potential infrastructure requirements to mitigate against significant adverse whole. This will be based on an individual Transport Assessment using an appropriate method of modelling that will take account of any agreed updates to TfL strategic modelling. Where identified appropriate planning conditions, S106 obligations and Community Infrastructure Levy to deliver measures to mitigate significant impacts on the Strategic Road Network will be required.</u> <p>Justification</p> <ul style="list-style-type: none"> The site is the largest piece of Strategic Industrial Land that falls within the Local Plan boundary. Given <u>the need within the borough to provide additional industrial floorspace capacity</u> Brent's status as a 'provide capacity' borough in the London Plan, it will perform a vital role in meeting future employment <u>industrial</u> needs. Currently although vacancy is low, it is not intensively used, contains many old buildings that have had very limited investment, includes many non-business uses which could be accommodated outside dedicated employment areas and is an overall poor quality environment in a gateway location. <u>Close proximity to</u> The development of the Brent Cross Opportunity Area across the Edgware Road in LB Barnet with its associated planned extension of Brent Cross shopping centre, provision of office development, residential and the opening of Brent Cross West Thameslink station and potentially the 	

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			West London Orbital rail route will change the local environment and the area’s accessibility. It provides an opportunity to reconsider the area’s role, to potentially increase its performance as an employment area, but also address other strategic needs, such as providing new homes, improving the image of Brent on a gateway site, increasing the visibility and relevance of Welsh Harp as an environmental asset and addressing significant physical barriers to pedestrian and cycle movement across the borough.	
MM30	5.2 East	BESA1, page 97	<p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Mixed use development including on the ground floor and upper floors if needed to accommodate the required floorspace, replacement of the existing employment B1-B8 light industrial and storage and distribution floorspace and on the McDonalds site A1-A5 retail or takeaway and/or light industrial and storage and distribution B1-B8 employment uses, with the remainder being residential on the upper floors.</p> <p>Indicative Capacity 3886 sqm light industrial and storage and distribution B1-B8 on the existing local employment sites (0.5 plot ratio) and 400 sqm retail or takeaway A1-A5 uses/ light industrial and storage and distribution B1-B8 on the McDonalds site (replacement of existing floorspace, with potential for more employment), plus 194 dwellings.</p> <p>Timeframe for Delivery 01-5 Years 65-10 Years 101+ Years 42 </p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Planning Considerations</p> <p>The site has no designated heritage assets.</p> <ul style="list-style-type: none"> • The Neasden Conservation Area is located to its south east approximately 30 metres away at its closest. The site is bisected by Coombe Road which provides access to Roger Stone Court. Regular bus services provide links to Wembley and Neasden underground stations. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Parts of the site fall within fluvial flood zone 3. It also is All the site has a residual risk of reservoir flooding should a defence failure occur. A site specific Flood Risk Assessment will be required and a sequential approach to the local location of uses followed. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • There is limited green infrastructure on site. There is some minor recent landscaping on the McDonalds site. There is A semi mature Ash tree along Coombe Road which will need to be kept. • There are also some trees adjacent along the River Brent and Brent Canal Feeder; both of these corridors are also Sites of Nature Conservation Value Grade 2. • Provision of industrial floorspace as part of a mixed use development should be maximised through a design led approach and viability testing. At the very least a replacement of the existing floorspace on individual sites that come forward, or a plot ratio of 0.65 whichever is the greatest will be required. • <u>Replacement of the existing McDonalds or provision of alternative town centre uses on this part of the site consistent with the size and role of the retail parade, will be supported.</u> 	

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			<p>Design Principles</p> <ul style="list-style-type: none"> • Development of up to 5/6 storeys (with the upper storey set back so as not to be visible from the adjacent pavement) with a step down to four storeys (top storey set back) on the edges of the will be acceptable on the Neasden Lane frontage. On Coombe Road up to 5 storeys will be acceptable with a set-back on the upper storey and reduction down to 4 storey on the edges. Within the remainder of the site up to 5 storeys will be acceptable. • A contemporary design will be supported, particularly where development takes influence from the positive characteristics of the surrounding buildings and structures, for example in breaking up the facades in a manner consistent with the plot width/ rhythm of the terraces along Neasden Lane. • Active frontages will be maximised at ground floor on Neasden Lane and Coombe Road. Ideally these will be principally provided by the employment/ commercial elements. • The areas adjacent to the River Brent and Brent Canal Feeder should be set back from the boundary, appropriately landscaped and include a footpath to allow for potential future public pedestrian routes adjacent to the watercourses. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Delivery of the waterside pedestrian routes and their future potential to be made available for public use attaching to future additions will be sought through a S106. • A financial contribution towards real time information being provided at the bus stop on the opposite side of the road will be sought. • Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. 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 	

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			<p>to the development creating identified additional capacity requirements. Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p> <p>Justification</p> <ul style="list-style-type: none"> • The site is a poor piece of townscape and could be used more intensely given its used to a relatively low intensity given its position adjacent to a main movement corridor. The McDonalds in particular is a poor piece of townscape inconsistent with the small set back from the edge of pavement/ strong building line along the rest of the road. Other recent developments along Neasden Lane indicates that sites can be used more intensively to provide mixed use schemes that provide employment opportunities/ services as well as adding to the dwelling stock. The site has good access to public transport and local infrastructure including shops and open spaces. • The council needs to ensure Continued provision of employment industrial space is required to meet needs, so will seek its retention of employment uses on site. • The existing Replacement McDonalds/retail is a draw that helps the vitality and viability of the parade. Its replacement or provision of alternative town centre uses on this part of the site, if consistent with the size and role of the retail parade, will be supported. • The sites are in close proximity to watercourses and partly at Risk of flooding. The location of buildings and their design will have to ensure that there is no unacceptable risk to building occupants, or property and people elsewhere as a result of any proposed development. needs to be properly addressed. • Setting back buildings from the watercourse provides an opportunity for their enhancement and also potential future public access along pedestrian routes. 	

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MM31	5.2 East	BESA2, page 99	<p>Allocated Use</p> <p>Mixed use development to include replacement or relocation of bus depot in lower ground floor and upper floors (offices on Edgware Road frontage if needed) to accommodate the required floorspace with the remainder being residential on the upper floors</p> <p>Indicative Capacity</p> <p>10,000 sqm Sui Generis based on the existing employment industrial site's floorspace required to replace bus depot/ create suitable residential environment above, plus 202 dwellings.</p> <p>Timeframe for Delivery</p> <table><tr><td>01-5 Years</td><td>65-10 Years</td><td>101+ Years</td></tr><tr><td>0</td><td>0</td><td>202</td></tr></table> <p>Description of Existing Site</p> <p>The site comprises two separate land ownerships, the majority by Transport for London Metroline. A part single storey and three (+ basement) bus depot fronting Edgware Road to the east, with associated bus parking across the majority of the site. In addition there is a single storey café on the south eastern corner along Edgware Road. The site drops away from Edgware Road. It is bounded on the east by the Edgware Road. On the opposite side of Edgware Road are a mixture of industrial/ self- storage and retail premises, forming part of the Colindale Area Action Plan boundary in London Borough of Barnet. The north and south are bounded by railway lines which is elevated on the south and at grade on the north. There is two storey residential to the north and a mixture of single storey retail/ three storey residential to the south.</p> <p>Ownership</p> <p>Public and Private Sector</p>	0 1-5 Years	6 5-10 Years	10 1+ Years	0	0	202	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE2), London Plan policies, and incorporate essential infrastructure needs.
0 1-5 Years	6 5-10 Years	10 1+ Years								
0	0	202								

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>PTAL Rating 1b and 3 existing and forecast to (Current and 2031 estimate).</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site has no designated heritage assets and there are none in close proximity. Six regular bus services provide links north and south along the Edgware Road to Alperton, Brent Cross, Brent Park, Edgware, Golders Green, Hammersmith, Kilburn, Paddington, Victoria and White City. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Parts of the site towards its western end fall within surface water flood zone 3. A site specific Flood Risk Assessment will be required and a sequential approach to the local location of uses/ buildings followed to ensure that the development does not create an unacceptable on or off-site flood risk. • There is very limited green infrastructure on site. The majority is Adjoining in the railway land which is a Site of Important Nature Conservation Grade 1, forming part of a wider corridor, which includes trees and scrub. Development should not undermine these this designations. There is a semi mature and two newly planted London Plane street trees on Edgware Road which will need to be kept. • The site is a Locally Significant Industrial Site. Any proposal must ensure the replacement of the bus depot, or if 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. If operationally this is not required, provision of industrial floorspace as part of a mixed use development should be maximised through a design led approach and viability testing. 	

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			<ul style="list-style-type: none"> At the very least a A minimum 0.65 plot ratio or replacement of the existing industrial floorspace total, or a plot ratio of 0.65 whichever is the greatest will be required. Commercial development along Edgware Road at ground floor level may also be appropriate if the minimum employment industrial floorspace is provided. Residential will be appropriate on the upper floors of any redevelopment if it can be shown to not undermine the bus depot/ future employment uses. <p>Risks</p> <ul style="list-style-type: none"> The main risk is the Site availability of the site for development in the context of Transport for London operational requirements from Transport for London. Increasing importance of public transport, plus land pressures mean sites to relocate to will be scarce, whilst redevelopment may well prove difficult whilst the site remains operational. <p>Design Principles</p> <ul style="list-style-type: none"> Development of up to 6 storeys (with the upper storey set back so as not to be visible from the adjacent pavement) along Edgware Road with a step down to five storeys (top storey set back) on the edges of the will be acceptable. A contemporary design will be supported, particularly where development takes influence from the positive characteristics of the surrounding buildings and structures, for example in breaking up the facades in a manner consistent with the plot width/ rhythm of the traditional terraces along Edgware Road. Active frontages will be maximised at ground floor on Edgware Road. Ideally these will be principally provided by the employment industrial/commercial elements and residential entrances. <u>Setting back buildings from the railway lines provides an opportunity to enhance the wildlife corridors.</u> 	

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			<p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Additional vehicular entrance for the residential that does not conflict with the bus movements/ pedestrian crossing. • A financial contribution will be sought to additional street tree planting along Edgware Road outside the site. • Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. 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. <p>Local upgrades to the existing water network infrastructure may be required to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p> <p>Justification</p> <ul style="list-style-type: none"> • The site is used to a relatively low intensity in terms of its building occupancy given its position adjacent to a main public transport movement corridor. • It forms a poor piece of townscape along much of its length inconsistent with the edge of pavement/ small set back from the edge of pavement/ strong building line along the more traditional parts of the road. • Other Recent developments along this road indicates that sites can be used more intensively to provide mixed use schemes that provide employment opportunities/ services as well as adding to the dwelling stock. • The site has the Potential to deck over the bus garage use and provide an acceptable residential environment above. • It has good access to public transport and local infrastructure including shops, open spaces and schools. • The council needs to ensure continued provision of employment industrial space, so will seek the retention of the bus depot or replacement 	

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			<p>employment space on this site. In addition there might be some scope for provision of town centre uses along the Edgware Road frontage, if consistent with the size and role of a retail parade, will be supported. The site due to its fall and location below elevated rail corridors appears to be at risk of surface water flooding. The location of buildings and their design will have to ensure that there is no unacceptable risk to building occupants, or property and people elsewhere as a result of any proposed development. Setting back buildings from the railway lines provides an opportunity to enhance the wildlife corridors.</p> <ul style="list-style-type: none"> The site allows for taller buildings than currently exist on site, but is not within a tall buildings zone a location regarded as acceptable for taller buildings than those set out in the design principles. 	
MM32	5.2 East	BESA3, page 102	<p>Allocated Use D1 <u>Medical or health service, crèche nursery or day centre, learning and non-residential institutions or local</u> community use and residential</p> <p>Indicative homes 30<u>57</u></p> <p>Comments Replacement D1/ <u>to address potential loss of community</u> floorspace required.</p>	To make consistent with updated housing trajectory, reflect changes to Use Class Order and social infrastructure need.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM33	5.3 North	BP3, Page 110	<p><i>Amend part b) of 'Character, Heritage and Design' of policy to read:</i></p> <p>Maintain and enhance local character and distinctiveness by:</p> <p>b) Respecting the predominantly suburban low rise character of the area. Tall buildings of 30 metres or more will be directed to the Burnt Oak and Colindale Growth Areas, in town centres around 18 metres (6 storeys) and intensification corridors around 15 metres (5 storeys) could be appropriate. In these areas development should be stepped down to form a comfortable relationship with adjacent areas.</p> <p><i>Amend part d) of 'Homes' of policy to read:</i></p> <p>d) <u>Minimum of 2,800 additional homes in the period to 2041, principally through the</u> continued residential development within the Burnt Oak and Colindale Growth Area (<u>around 2,100 homes</u>). The potential residential development for the extension of the Burnt Oak and Colindale Growth Area, referred to as Capitol Valley, will be determined by a masterplan, taking into account the need to intensify employment <u>industrial</u> use on the site.</p> <p><i>Amend part j) and part k) of 'Town Centres' of policy to read:</i></p> <p>j) Establish clear identities for the Colindale/ The Hyde and Burnt Oak through implementing public realm, building upgrades and shop facade improvements.</p> <p>k) Provide up to 4,400 sqm of net comparison goods floorspace, up to 3,600 sqm <u>1,600 sqm</u> of net convenience foods <u>retail</u> floorspace, up to <u>5200</u> sqm class A3<u>cafe/ restaurant</u> floorspace and 2100 sqm class A4<u>drinking</u></p>	To provide clarity on strategic housing delivery numbers across the Places, make consistent with Local Plan and London Plan policies. Better address social infrastructure needs, new UCO and the Retail and Leisure Needs study (EB_E_06).

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>establishment floorspace by 2028. This floorspace should be directed towards the three town centres.</p> <p><i>Amend part m) of 'Community and Cultural Facilities' of policy to read:</i></p> <p>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</p> <p>n) Explore opportunities for additional secondary school provision within this place.</p> <p><i>Amend part s) of 'Community and Cultural Facilities' of policy to read:</i></p> <p>s) Supporting new and improved employment industrial premises as part of a wider site development with Morrison's at Honeypot Lane (Lowther Road).</p>	
MM34	5.3 North	BNGA1, Page 116	<p><i>Amend second paragraph of the policy to read:</i></p> <p>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.</p> <p>Burnt Oak/ Colindale Growth Area will deliver over 2,010 new homes to 2041, supported by social and physical infrastructure to include:</p> <ul style="list-style-type: none"> Improvements to the quality and accessibility of existing local open spaces 	Consistency with London Plan, housing trajectory, Council's evidence base Open Space, Sports and Recreation Study.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> A series of play areas within new developments and open space, <u>including a 0.2ha pocket park, and improvements to existing open space</u> <u>The creation of informal recreation and good quality public realm</u> Improved cycle infrastructure along the A5 	
MM35	5.3 North	BNSA1, Page 118	<p>Existing use Locally significant industrial site containing a range of uses, such as car repairs, car show rooms, warehouses and distribution parks. <u>Outside the LSIS there are a mix of non-industrial uses including</u> a large retail superstore in the south eastern corner of the site, and a petrol station, an MOT shop and large car dealership with associated car parking/ storage in the north eastern corner.</p> <p>Allocated use Mixed-use development comprising areas of employment <u>industrial</u> intensification and co-location with other uses, retention of superstore of same size, or less, residential development and any associated required social infrastructure.</p> <p>Indicative capacity A future masterplanning process <u>involving site owners/ occupiers and other stakeholders</u> will provide clarity.</p> <p>Timeframe for delivery 01-5 years 56-10 Years 101+ Years 14201 68300 68599</p> <p>Description of existing site</p>	<p>To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies.</p> <p>Incorporate essential infrastructure needs, industrial land re-provision, ensure publically accessible routes, clarity on master planning approach, air quality issues, identify existing SINC, and</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Capitol Way Colindale Locally Significant Industrial Land – The LSIS consists of A number of Predominantly small scale, 2 storey industrial units that are generally no taller than two storeys in height. The majority of units which form the LSIS are small, with only a small number of larger units. The majority of these larger units are located within the western part of the LSIS. Located to the east of the LSIS within the site allocation within the eastern part is a car dealership and associated servicing workshops, parking/ storage land. A petrol station forms the north westerneastern corner. ASDA Superstore - Located in the south eastern corner of the site is one large superstore (ASDA) with a two-storey car park at the rear. To the south of the site is Grove Park, social infrastructure (health centre, place of worship), residential development, Morrisons and Bang Bang Oriental Food Hall. To the west of the development is Stag Lane and residential development which is predominantly two storey in character. To the north of the site is residential development along Homstall Avenue and to the east is the A5 and new flatted residential development known as TNQ. <p>Planning history</p> <ul style="list-style-type: none"> The ASDA superstore formed part of the previous Site Specific Allocation BC/1 in 2011. The allocation, which included the former Oriental City site, was identified for mixed use development which included residential, retail, food and drink, community facilities and leisure and the re-provision of Chinese and Far Eastern commercial and community floorspace. Within the Capitol Way LSIS, permission (17/0837) has been granted for the <i>“Demolition of the existing buildings and redevelopment of the site to provide six buildings ranging between four to nine storeys and eight three storey mews houses, and the erection of a two storey commercial building, providing a total</i> 	address engagement as part of the masterplan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><i>of 4,051m of flexible commercial floorspace across the site and 414 residential units” at 1-8 Capitol Way.</i></p> <p>PTAL rating</p> <p>The PTAL rating of the site ranges from 1b-3. 1b-3 (current and 2031 estimate)</p> <p>Planning considerations</p> <ul style="list-style-type: none"> • The site is included within the amended boundary of the Burnt Oak and Colindale Growth Area which has the potential to accommodate significant growth. • A significant portion of the site is designated as a 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 site will be subject to a masterplan process to comprehensively identify how it can increase useable employment employment industrial floorspace <u>(resulting in a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater),</u> whilst contributing to the Council’s vision for the Burnt Oak and Colindale area of creating ‘<i>a mixed, vital, accessible and pleasant district</i>’. Until a masterplan for the site has been agreed/ adopted by the council, no redevelopments (apart from 17/0837 that already consented) will be permitted within this area. <u>Developments of non-industrial uses will not be permitted on LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • <u>In order to ensure a comprehensive approach to the masterplanning of the site, consideration will be given to the use of Compulsory Purchase Powers where necessary.</u> • To the east of the site in the London Borough of Barnet is the Burnt Oak and Colindale Opportunity Area, with a regeneration and growth programme to deliver 10,000 new homes, a new neighbourhood centre and improved public transport services. The masterplanning process for this site should take into consideration the growth adjoining <u>in the Burnt Oak and Colindale Opportunity Area</u>, and seek to ensure ing that development contributes to creating a shared sense of <u>coherent</u> townscape/landscape. • Located in the south-eastern corner of the site is a large retail superstore. The retail superstore is within an 'out-of-town centre' location. The store is well established and trading well. No alternative sites have been identified that could accommodate it in nearby Brent town centres. As such it's retention is sought <u>In recognition of its successful trading and the lack of local alternative sites, a supermarket should be retained</u>, although an increase in floorspace is not <u>required</u>. Any additional retail floorspace will be subject to the Sequential Test and an 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> • The site currently contributes little to the frontage along Edgware Road. Any proposed Development will need to address this through creating an active frontage along its the length of Edgware Road. • The site is located on a historical industrial site. A Preliminary Contamination Risk Assessment will be required, and if necessary remediation. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Furthermore, The areas of the site which directly adjoin the A5 are is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within a Growth Area. Noise associated with the adjoining roads and continued industrial/employment uses on site will need to be addressed in the design of the development. There is some potential for tall buildings, subject to stepping down towards the surrounding residential areas. The appropriate height, extent and location of buildings will be identified within a masterplan for the site. The site is located within a Tall Buildings Zone. The site is in close proximity to Grove Park, a local park which also contains a Grade II SINC site. The impacts of development on the integrity of the SINC through increased patronage of the park will need to be considered and if necessary appropriate mitigation provided. None of the site is within Flood Zone 3 for fluvial flooding, however there are Parts of the site are within surface water flood zone 3 for surface water. These which are principally, although not exclusively, within highway land. The site is located within an area which is susceptible to groundwater flooding. Edgware Road, which adjoins the site to the east, is relatively busy. The site is in an area of low PTAL and is located approximately a 12-minute walk from Colindale Tube Station. Development proposals will need to consider the impact that additional cars may have on the Edgware Road, and the surrounding road network. Due to a relatively low PTAL score, some car parking spaces to serve the development are likely to be required. These should be designed to ensure 	

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			<p>that they do not have a detrimental impact on the streetscape of the development.</p> <ul style="list-style-type: none"> There is a bus stop which serves the site. <p>Risks</p> <ul style="list-style-type: none"> Fragmented nature of landownership could increase time taken to deliver. Furthermore, This landownership could result in a piecemeal, rather than a comprehensive approach to redevelopment of the site, which could create a disjointed environment and inadequate provision on infrastructure. Potential for a lack of co-ordination with the London Borough of Barnet related to the cumulative impacts of the Burnt Oak/ Colindale Opportunity Area. <p>Design principles</p> <p>Key issues for any future masterplan to include:</p> <ul style="list-style-type: none"> Ensuring successful co-location/ intensification to allow the area to successfully retain, and enhance its industrial/employment function. Factors to be considered include dedicated parking and services facilities. Tall buildings on this site should respond to the height of the surrounding residential character and ensure that there is a stepping down towards 2-storey character to the north, west and part of the east. Providing high quality public realm, which improves pedestrian and cycle movement and complements the work being undertaken in the Burnt Oak/ Colindale Opportunity Area. Access to the site to be considered carefully to ensure no conflict is created between different users and the potential for north-south and east-west 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>pedestrian and cycle connections in particular between Stag Lane and Edgware Road to be enhanced in number and quality</u></p> <ul style="list-style-type: none"> • Interface between residential and industrial uses • Improving access to Grove Park <u>(which contains a Grade II listed SINCE)</u>, whilst ensuring the current green and open space on the site is maintained and enhanced. Additional green infrastructure is likely to be required to support development on site. • Creating an active frontage around the sites edges along streets and in particular along the Edgware Road frontage • Providing tree planting along the Edgware Road frontage to address air quality/ Healthy Streets agenda • The masterplan for the site will also need to take <u>Taking</u> into consideration the 'Burnt Oak and Colindale Placemaking Plan'. <p>Infrastructure requirements</p> <ul style="list-style-type: none"> • Due to the low PTAL score of the site, some car parking will need to be provided. • Retention and enhancement of undesignated existing green space and additional green infrastructure should be incorporated. • Improvements to the public realm should also be addressed. • Increased traffic at site could require some junction improvements, which will need to be determined through a transport assessment. • Social and physical infrastructure requirements to be fully drawn out in future masterplan work on the site. • 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 being required to meet additional demands created through the development. 	

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			<p>Justification</p> <p>This site incorporates land within the Burnt Oak and Colindale Growth Area, and land which adjoins it. This area has previously been identified as a suitable location to accommodate growth, as well as providing an opportunity to boost business and employment opportunities within the borough. Furthermore,</p> <p><u>provides an opportunity to create a new mixed use area providing many homes whilst</u> the intensification/ co-location of the LSIS will contribute to meeting the 'provide capacity' status given to Brent within the London Plan</p> <p><u>strategic industrial floorspace requirements</u>. 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<u>It</u> also has good access to services and amenities which will support intensification/ co-location.</p>	
MM36	5.3 North	BNSA2, page 121	<p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Mixed use development to include residential, retail and employment<u>replacement industrial and office space/affordable workspace.</u></p> <p>Timeframe for Delivery 0<u>1</u>-5 years 5<u>6</u>-10 Years 101+ Years 0 200<u>100</u> 300<u>400</u></p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> The multi-storey car park is approximately 5 storeys in height and contains a car showroom on the ground floor. Adjoining and to the front of the multi-storey car park is a small area of hard and soft landscaping, which is being used to store cars associated with the dealership. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BD2, Policy BSUI2, Policy BE2, Policy BE3), London Plan policies, incorporate essential infrastructure needs an industrial land re-provision.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Southon House, an office block which forms the site's south eastern corner, is approximately 6 storeys in height. There is an area of green space which sets the building back from the A5 road, which it adjoins to the east. Set back from the A5 is Colindale Retail Park, which consists of six retail units, which are in a horseshoe configuration with associated car parking. The retail units are two storeys in height, and are large and bulky in form. Forming the southern part of the site is a car dealership, <u>servicing centre/workshop</u> and associated car parking. There are a number of structures located on this part, which are no taller than 3 storeys in height. The site is set back from the A5 by areas of green space and hardstanding that is being used to display cars. There is also an area of hardstanding to the west of the main building which is used as a staff car park. There are variations in site levels, decreasing in level from west to east. <u>The site is set back from the adjacent Edgware Road by areas of hard and soft landscaping.</u> To the north of the site is recently redeveloped residential properties, a primary school and mixed use buildings. To the east of the site is the A5, a 7-16 storey residential building and fast food outlet. To the south of the site is Colindale Town Centre, and to the west is <u>2 storey</u> residential <u>terrace</u> development, where the predominant character is 2 storey terraced. <p>Relevant Planning History Some of the site formed part of the previous Site Specific Allocation B/C2. The allocation, was identified for 'Mixed used development to include residential and workspace, a proportion of which to be managed affordable workspace'. None relevant</p> <p>PTAL Rating</p>	Provide clarity on local heritage assets.

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			<p>The PTAL rating of the site varies from 2-34. The majority of the northern and southern part is within PTAL rating 2, with the central part achieving PTAL rating 3-4 2-4 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is located within the boundary of the Burnt Oak and Colindale Growth Area, which has been identified by the council as an area which has the capacity to accommodate significant growth. Due to the site's location within a Tall Buildings Zone transformational area, there is some potential for tall buildings, subject to stepping down towards the 2 storey character to the west of the site, and 2 to 3 storey character to the south east of the site. The site currently has a poor quality frontage along Edgware Road, with most buildings set back from historic building lines. The council has a desire to create active frontage between the two centres of Burnt Oak and Colindale. Redevelopment at this site should ensure that historic building lines are reinstated, and that active frontage is provided along Edgware Road this is achieved. There are a number of trees fronting onto Edgware Road and along Hay Lane. Where possible, these trees should be retained and additional trees provided. The site is located within an Air Quality Management Area. As it is within a Growth Area such development at this site should be air quality positive. Due to the site's location on a historic industrial site there is risk of contamination; a Preliminary Risk Assessment will be required, and if necessary remediation. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Potential noise associated with the adjoining road will have to be addressed in the design of the development. The site adjoins the A5, with access to the retail park via a signalised junction. Access to the large car showroom is via Hay Lane. Due to the relatively low PTAL levels across this site, some car parking facilities will need to be provided. The council will encourage the use of lower parking provision, in line with London policy. The site allocation seeks to introduce a residential element to this site, whilst retaining its commercial and retail elements. To understand the likely impacts that this will have on local road networks As such, A transport assessment for this site will be required. This assessment, and should inform any potential transport infrastructure improvements that may be needed to support the redevelopment of this site. <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. 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) to 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> The site is in close proximity to Beis Yaakov Primary School and Nursery, which is a locally listed building. Development at this site should avoid having any detrimental impact on the setting of this building. The site is located within an area which is susceptible to groundwater flooding. There are also small areas within the site which are susceptible to 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>surface water flooding. The majority of the site is located within an area which is susceptible to sewer flooding. A flood risk assessment will need to address how development satisfactorily addresses these matters.</p> <ul style="list-style-type: none"> There are some variations in the site levels, especially within the southern part, which will need to be taken into consideration, particularly when considering heights for development. <p>Risks</p> <ul style="list-style-type: none"> Multiple land ownership at this site could increase time taken to deliver: Furthermore, landownership, and could result in a piecemeal development coming forward, rather than a comprehensive approach to the redevelopment of the site. Impact on the A5, and A5150 intersection as a result of introducing residential development at this site. <u>This may increase costs affecting viability or slow down delivery.</u> Potential for lack of co-ordination with the London Borough of Barnet in relation to the cumulative impacts of the Burnt Oak/ Colindale Opportunity Area. <p>Design Principles</p> <p>Key issues for any future masterplan to include:</p> <ul style="list-style-type: none"> Residential development along Evelyn Avenue, which adjoins the site to the west, is predominantly two-storeys in character. The western edge of the development should respond to the suburban nature of this area by ensuring there is a step down in height. 	

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			<ul style="list-style-type: none"> Layout of the site should improve permeability, and ensure that there are links to the footpaths created as part of the adjoining site formerly occupied by Sarena House. Enhance and create active frontage along Edgware Road between Burnt Oak and Colindale Town Centres. Provide tree planting along the Edgware Road frontage to address air quality/ Healthy Streets agenda. Provision of higher quality public realm, which improves pedestrian and cycle movement, and complements the work being undertaken in adjoining Colindale Growth Area. Development at this site will need to take into consideration the 'Burnt Oak and Colindale Placemaking Plan'. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Increased traffic at site, as a result of residential developments associated parking, may require the current vehicular access to be reconsidered. Increased traffic at site, as a result of residential developments associated parking, may require the current traffic light junction vehicular access to be reconsidered. Due to relatively low PTAL rating of this site, some car parking facilities may be required, in addition to improvement to the existing traffic light junction including pedestrian crossing points as well as improvements to bus services/ bus stops 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 being required to meet additional demands created through the development. 	
MM37	5.3 North	BNSA3, Page 124	<p><i>Amend policy name to read:</i></p> <p>POLICY BNSA3 – HONEYPOT LANE QUEENSBURY LSIS AND MORRISONS</p>	Amend name to make correct reference to LSIS,

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Mixed use development – intensification at Honeypot Lane <u>Westmorelane Road</u> LSIS, co-location at Lowther Lane Honeypot Lane <u>Lowther Lane</u> LSIS. Redevelopment of the superstore site at Honeypot Lane, to include residential and retail floorspace.</p> <p>Timeframe for Delivery 01-5 years 56-10 Years 101+ Years <u>194</u> 190 193<u>189</u></p> <p>Description of Existing Site There are three main areas which form this site allocation</p> <ul style="list-style-type: none"> • Honeypot Lane LSIS (Westmoreland Road) - Consists of a number of industrial units that range in size and are predominantly 2 storey and surrounded by poor quality public realm. • Morrisons Superstore - a single storey large supermarket and petrol station, with extensive surface car parking. • Honeypot Lane LSIS (Lowther Road) – the majority of the western portion of this LSIS site consists of two large units (B&Q and Selco) and associated car parking/ storage areas. The buildings take the form of warehouses, which are at least 8 metres tall. To the north and east in the site are smaller units, predominantly 2 storeys in height. • The Jubilee Line borders the site to the east. To the <u>north and</u> west of the site is Honeypot Lane, and suburban residential properties within the adjacent London Borough of Harrow, as well as to the north. To the south is 	<p>increase brevity, make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies, incorporate essential infrastructure needs and include greater consideration to potential impact of adjacent railway.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>the NHS Trust Kingswood Centre, the White Garden SINC site and residential and commercial development.</p> <p>Planning History</p> <ul style="list-style-type: none"> The Morrisons supermarket was previously identified as a site allocation (SSA 16) for 'Use of north and eastern section of car park for residential development including family sized accommodation. Alternatively, a mixed use development including residential and retail floor space'. Planning permission (16/0595) has been granted for the 'Demolition of existing single storey temple building and erection of a new 5 storey temple with a shikhar (tower), basement level for storage and plant equipment, ancillary library and educational use, priest accommodation, and a function room' at 6 Bowman's Trading Estate. Planning permission (18/2183) has been granted for the car park north east of Morrisons for the 'Erection of three buildings at 4, 5, and 7 storeys providing 194 residential units (76 x 1 bed, 75 x 2 bed and 43 x 3 bed), 60 car parking spaces (including disabled parking spaces), private and communal landscaped amenity areas, landscaped podium deck, secure cycle parking, recycling and refuse stores, access improvement and other associated developments', subject to the signing of a S106 agreement. <p>PTAL Rating</p> <p>The majority of the site is located within PTAL rating 3, with the Westmoreland Road LSIS within either PTAL 2 or PTAL 1a. 1a-3 (current), 2-3 (2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The Morrisons is in an out of centre location and trading well. There are no sequentially preferable locations available in Brent's town centres locally that could accommodate the store. Therefor the retention of a supermarket of 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>similar size on site would be sought. As an out of centre site, sequentially it is not the preferred location for additional retail space/ town centre uses. <u>In recognition of its successful trading, and the lack of alternative sites within the area, the supermarket should be retained although an increase in floorspace is not required.</u> Any such additional space will need to pass the sequential test and an impact assessment.</p> <ul style="list-style-type: none"> • The site contains two Locally Significant Industrial Sites. The intensification and co-location of these sites will be consistent with London plan <u>policy E7ies</u>, which has identified Brent as a 'provide capacity' borough. <u>and result in a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater.</u> No permissions for non-employment uses within the LSIS will be allowed in advance of masterplans being approved which show how intensification/ co-location will work in practice/ be achieved to result in an increase in industrial floorspace. <u>Developments of non-industrial uses will not be permitted on LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • <u>In order to ensure a comprehensive approach to the masterplanning of the site, consideration will be given to the use of Compulsory Purchase Powers where necessary.</u> • The site is in proximity to a number of green spaces. Adjoining to the east is a wildlife corridor. To the north is the White Garden which is a Grade I SINC of borough importance. In close proximity to the east is Queensbury Circle. Development at this site should seek to enhance these green spaces and not disrupt the movement of wildlife. To complement these features, the inclusion of green infrastructure should be designed into the site. ^{MM?} 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • A significant proportion of the site is susceptible to groundwater flooding. There are also areas of the site which are at risk of surface water flooding, however these areas are being principally within, but not exclusively, highways and areas associated with car parking land. • The site is located on a historical industrial site. A Preliminary Risk Assessment for contamination will be required, and if necessary remediation. • The site is located within an Air Quality Management Area. As such, development at this site should be at least air quality positive. • Noise associated with the continued industrial use, or intensification of employment industrial uses on site will need to be addressed in the design of the development. • The use of the road to the rear of Morrisons as a TfL bus layover will also need to be taken into account. • There is some potential for taller buildings within this site boundary (around 6 storeys), but there should be a stepping down towards the neighbouring residential uses, which are predominantly two storeys in character.^{MM?} • To the left of the site is Honeypot Lane, which is a London Distributor road. A transport assessment for the site will be required to determine the impact that development at this site will have on the road network. • <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> <p>Design Principles The design and layout of the area should be determined through the Masterplanning process. Key points that will need to be addressed within the masterplan include:</p>	

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			<ul style="list-style-type: none"> • Building heights should be around 6 storeys and should step down towards the adjacent residential that will remain. • Ensuring there is successful co-location/ intensification on the LSIS sites to ensure the area continues to prosper as an employment industrial location. • The site adjoins the Kingswood Centre which is an NHS building that provides a therapeutic environment of green space for patients. Development should ensure that there is not detrimental impact on its setting. • Incorporating green infrastructure throughout the design, which contributes to the conservation and enhancement of the adjoining and nearby green spaces. • Proposals should seek to promote walking and cycling, including making provision for a cycle route along Cumberland Road. • Improvements to public transport, improving pedestrian connections to Queensbury Station and creating an additional bus stand on Westmoreland Road. • Active frontage along Honeypot Lane, Cumberland Road and Lowther Road, ideally using innovative design to reduce or remove any inactive frontage associated with the supermarket. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Social and physical infrastructure requirements for this site to be fully drawn out in any future masterplan related to the residential capacity of the area. • Retention of space for the 5 storey temple building on site. • Improvements to public realm, incorporation of green infrastructure and improvements to public transport accessibility. • 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 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>to ensure essential infrastructure is delivered prior to being required to meet additional demands created through the development.</p> <p>Justification Within the boundary of the site are two areas of locally significant industrial sites, which are not intensively used and contain buildings which are in poor condition. Given Brent's status as a 'provide capacity' borough in the London Plan, The proposed intensification and co-location at these sites will contribute towards meeting future employment industrial needs. Furthermore, London Plan policy encourages the comprehensive redevelopment of low-density supermarket sites. The site is also located in an area of higher PTAL, in relation to the surrounding area.</p>	
MM38	5.3 North	BNSA4, Page 127	<p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Residential, community use, and employment space, some residential development.</p> <p>Indicative Capacity Unknown — will require detailed assessment as part of planning application. 50 dwellings</p> <p>Timeframe for Delivery 0-5 Years 56-10 Years 10+ Years 50</p> <p>Description of Existing Site The site contains a Grade II Listed purpose built inter-War 2000-seat cinema and associated front of house areas, and is a good example of a relatively unaltered super-cinema from this era. It was converted into a bingo hall in the 1960s and closed on bingo use in 2014. The building height ranges between two</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>to three storeys. The main entrance of the building is located in the north eastern corner of the site.</p> <p>To the north of the site is new residential development which is to contain a 7 storey residential block with retail units on the ground floor. To the south of the site is a number of shops, with residential uses above. To the east of the site is residential development within the Barnet administrative area, which is largely 3 storeys in height. To the west is a residential area, which is predominately 2 storey in character.</p> <p>PTAL Rating The PTAL rating of the site ranges from 4-5 <u>(current and 2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is located within the town centre boundary of Burnt Oak. As such, the council would like to see active frontage created on this site, where considered appropriate. • Furthermore, the site is within the boundaries of the Burnt Oak and Colindale Growth Area, being a sustainable location to accommodate growth. • The former cinema on this site is Grade II listed and is a 'Building at Risk' contained on Historic England's Heritage at Risk Register. The cinema was constructed in 1938 and is a good example of a relatively unaltered large suburban neighbourhood super-cinema of the 1930s. Development at this site should ensure that proposals do not adversely affect its character as a building of special architectural or historic interest. • In comparison to other areas within Burnt Oak and Colindale, this site has relatively <u>The site has a</u> high PTAL levels. Therefore, development at this site should be car-free. 	

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			<ul style="list-style-type: none"> There are six trees within proximity to the site. Development at this site should not result in the loss of these trees. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Improvements to the public realm along Edgware Road to encourage the uptake of active travel. <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> 	
MM39	5.3 North	BNSA8 (comments), Page 129	Active frontage sought along ground floor of Turner Road. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2'.</u>	Consistent with evidence base to ensure safe development.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM40	5.4 North West	BP4, Page 137	<p><i>Amend part d) of 'Homes' of the policy to read:</i></p> <p>d) <u>Minimum of 2,285 additional homes in the period to 2041, principally through the Providing approximately 2,600 new homes as part of development within the Northwick Park Growth Area (around 1,600 net additional homes), including specialist accommodation to meet identified demand.</u></p> <p>e) Delivering mixed-use development on the Sainsbury's Kenton Road site</p>	Provide clarity on strategic housing delivery numbers across the Places, reflect new capacity for BNWGA1, reflect the Retail and Leisure Needs study (EB_E_06), social infrastructure needs, changes to Use Class Order and align terminology with

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><i>Amend part f) of 'Town Centres' of the policy to read:</i></p> <p>f) Supporting the creation of new <u>Provide up to 900 sqm comparison goods retail floorspace, 500 sqm convenience goods retail floorspace, 100 sqm café and restaurant floorspace, and 100 sqm of drinking establishment floorspace. This should be directed toward</u> within Preston Road and Kenton town centres providing that they are of an appropriate scale, to support their local function <u>by 2028</u></p> <p>g) Managing the likely overall reduction in length of the Preston Road and Kenton Town Centres</p> <p><i>Amend 'Community and Cultural Facilities' of the policy to read:</i></p> <p>h) Protecting and enhancing playing pitch field <u>provision at Northwick Park, JFS School, Claremont High School, John Billam Playing Fields</u> and Tenterden Sports Ground</p> <p>i) Encouraging community use Bryon Court Primary School's sports facility</p> <p><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> As part of the development within the Northwick Park Growth Area <u>where</u> the following improvements to community and cultural facilities should be achieved:</p> <p>j) Redeveloped and/or enhanced university hospital</p> <p>k) Redeveloped and/or enhanced university facilities</p>	national policy as sought by Sport England.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			l) Enhancements to Northwick Park Sports Pavilion m) Improved setting of and better integration of open space within the site to Northwick Park	
MM41	5.4 North West	BNWGA1A, after page 140	<p><i>Insert new policy after para 5.4.43 to read:</i></p> <p><u>Policy BNWGA1A Northwick Park Growth Area</u> <u>The Northwick Park site will undergo major regeneration, making the best use of land in this highly sustainable location. This will provide a mix of uses, helping to create a self-sustaining community with a sense of place, including around 1,900 new homes (net addition around 1,600 homes). Development will maximise the delivery of affordable housing, and will see the existing key workers rehoused on site in more suitable and modern dwellings. Delivery will include a high proportion of family dwellings in addition to purpose built student accommodation in association with the on-site university facilities.</u> <u>Although subject to transformational change, the scale of development will need to respond positively to its surrounding context, particularly with regards to building heights. Development will integrate strongly with the adjacent Metropolitan Open Land, providing green fingers which help to bring the park into the development.</u> <u>Funding generated as a result of the development will be reinvested into the existing on-site infrastructure, including the Northwick Park Hospital, and the University of Westminster Harrow campus. This will</u></p>	New Growth Area policy and justification text to make consistent with how growth areas are addressed in the Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>serve to enhance existing facilities through renewal, and the addition of complementary uses such as new medical, community and sporting facilities. Access to the site will be improved, through a new Watford Road junction and the adjacent Northwick Park London Underground station being made more prominent and accessible to all users. Supporting infrastructure associated with new housing development will be drawn up in a forthcoming masterplan, and as a minimum will include:</u></p> <ul style="list-style-type: none"> • <u>A new flexible retail offer adjacent to Northwick Park station which will serve to meet local needs;</u> • <u>A new nursery capable of meeting existing needs, and those arising from new development;</u> • <u>A range of multi-purpose green spaces which seek to enhance the biodiversity of the surrounding area whilst providing new play space for children, including 2 new 0.2ha pocket parks;</u> • <u>Improvements to site accessibility, prioritising funding toward the most sustainable modes of transport;</u> • <u>On site combined heat and power centre which will provide a network for surrounding major development, including potentially those at Harrow-on-the-Hill;</u> • <u>And enhancements to existing on-site infrastructure which serves the wider area and that of Greater London.</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>5.4.44 <u>The Northwick Park Growth Area is coming forward under the Governments One Public Estate (OPE) scheme, via the Northwick Park Partnership which includes all landowners, including the Council, Network Homes, National Health Service (HNS), and the University of Westminster. Together under the OPE scheme, the site will see the greater utilisation of land for residential development. This will help support the further delivery of essential large scale on-site infrastructures, including those which support and enhance the hospital and university functions.</u></p> <p>5.4.45 <u>The site is well connected, being adjacent to a range of public transport facilities, achieving a peak PTAL rating of 6a to 2031. This includes immediate proximity to Northwick Park LUL which includes the Metropolitan line to central London, Watford and west London, and Kenton LUL (a 5 minute walk) which includes the Bakerloo and Overground lines. There are also a number of buses which pass through the site, providing access in and around the local residential areas and serve access to the hospital.</u></p> <p>5.4.46 <u>The site is also adjacent to a significant amount of green infrastructure, including Northwick Park Metropolitan Open Land, Ducker Pool, Northwick Park golf course, and Harrow School playing fields. These areas include a number of Sites of Importance for Nature Conservation (SINC), and provide the opportunity to enhance these areas for both nature and recreation harmoniously.</u></p> <p>5.4.47 <u>The site is within close proximity to Kenton town centre which will enable residents to meet their wider needs. The site is somewhat detached from this area, and should therefore have on-site provision which will better enable</u></p>	

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			<p><u>occupants to meet their day-to-day needs using sustainable transport modes. The range of needs addressed on site will need to reflect the scale of development, and the types of residents (such as families and students), which are likely to occupy the site as a result of the housing delivered and its location.</u></p> <p>5.4.48 <u>Development will need to have strong consideration of development in the adjacent London Borough of Harrow. In particular, this will involve the potential linkages with the major development generated within the Harrow and Wealdstone Opportunity Area to the north, which has been identified in the London Plan as having the potential to delivery 5,000 new homes, and 1,000 new jobs. Specifically, development of any on-site energy centre will need to assess the potential for connection with this opportunity area.</u></p>	
MM42	5.4 North West	BNWGA1, page 142	<p><i>Amend parts of the policy to read:</i></p> <p>Allocated Use Growth Area - the site has been allocated for mixed used development; including a small amount of commercial floorspace and Additional residential development to enable upgrades/ refurbishment to the existing and retained Northwick Park Hospital and University of Westminster facilities. A replacement sports pavilion, small amount of commercial floorspace, and possibly new small-scale non-acute medical facilities to also be provided on site.</p> <p>Indicative Capacity</p>	<p>To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.</p> <p>Update with latest planning history, revise position on previously proposed MOL land swap, strengthen ball stop mitigation</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Capacity for circa 3,600 1,920 units, of which 2,600 1,585 net additional, development capacity will be better identified through a more detailed masterplan process.</p> <p>Timeframe for Delivery 10-5 Years: 650 218 (net 390) 56-10 Years: 1950 (net 910) 1,702 (1,367 net) 101+ Years:</p> <p>Description of Existing Site The site is located off Watford Road close to the boundary with the London Borough of Harrow. It is formed of five main areas: Northwick Park District Park, Northwick Park Hospital, Northwick Park Tube Station, Northwick Park Hospital Residential Accommodation and the University of Westminster. Within the site is a part of the one-way road system (also referred to as a 'ring road') that comes off of Watford Road, the main vehicular access for the site. Adjoining the northern boundary of the site is the Northwick Park underground station and tracks.</p> <p><u>The site consists of a mixed building stock of generally low quality, and is dominated by hospital buildings which range up to 8 storeys in height. The residential buildings on site provide accommodation for key workers and students.</u></p> <p>Northwick Park Station is a small, suburban station which has two platforms. The platforms are above the level of the surrounding area, and can be accessed by a flight of stairs from the ticket hall. The pedestrian connection from the station to Northwick Park is</p>	<p>requirement, clarify reservoir flooding risk and make reference to neighbouring borough protected views.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>through a narrow tunnel. Access to Northwick Avenue is relatively open from the ticket hall, past a small shop.</p> <p>Northwick Park Hospital residential accommodation forms the eastern, and part of the southern part of the Growth Area. It consists of a number of affordable homes provided by Network Homes, some occupied by hospital employees. These are terrace homes and flats, predominantly 2 to 4 storeys. All housing is set back from the road behind either grass verges, hard landscaping or car parking spaces.</p> <p>Northwick Park Hospital Campus consists of a number of buildings varying in height between two and eight storeys, mixed in quality and age. Large portions of the hospital campus are dedicated to at grade car parks. A multi-storey is located in the west. Northwick Park hospital provides a full range of services, which includes neurology, cardiology and elderly care medicine. It also has a 24/7 A&E service and Urgent Care Centre. It is one of the eight Hyper Acute Stroke Units within London. There are a number of trees located along the eastern boundary which provide a visual screen to Northwick Park.</p> <p>University of Westminster comprises a number of buildings forms the western part of the Growth Area. Between these there are some areas of open/ communal space. Halls of residence are located within its northern part with an associated green space, not currently publicly accessible. This green space has a variation in site levels and a number of trees. Trees line the southern boundary of the university site, acting as a visual break between it and the Northwick Park Hospital.</p>	

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			<p>Northwick Park sports pavilion provides changing rooms and facilities to support recreation on the park. The facility is tired, needing significant investment to enhance its quality to allow the sports pitches to be used to their potential.</p> <p>Ownership The London Borough of Brent, London North West University Healthcare NHS Trust, the University of Westminster and Network Homes are the key landowners, <u>who come together to form the Northwick Park Partnership which will develop the site under the</u> They have committed to work in partnership through a memorandum of understanding to promote the redevelopment of land at Northwick Park in a comprehensive manner through joint-working as part of the One Public Estate programme: <u>Transport for London own Northwick Park station and adjacent railway land.</u></p> <p>Relevant Planning History There have been numerous applications for the hospital site including new buildings, extensions, creation of multi-storey car park, ancillary services/infrastructure and facilities to support the functioning of the hospital.</p> <p><u>Applications for redevelopment of the site under the Northwick Park Partnership include:</u> <u>Permission (19/4272) has been granted for the 'Erection of a multi-storey car park on 5 levels for staff only, a separate plant/energy facility and associated works to access road at Northwick Park Hospital'</u></p>	

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			<p><u>Permission (20/0677) has been granted for 'Full planning permission for junction improvement works to the A404 (Watford Road), and the widening of the existing Northwick Park Hospital spine road to allow two-way traffic; pedestrian and cycle improvements and associated landscaping and public realm works, and associated changes to access, and subject to a Deed of Agreement dated 4 December 2020 under Section 106 of the Town and Country Planning Act 1990, as amended'</u></p> <p><u>Permission (20/0701) has been granted for 'Full planning permission for demolition of existing buildings and structures on the site, all site preparation works for a residential led mixed-use development comprising 654 new homes, associated car and cycle spaces, a replacement nursery, retail space, associated highways improvements, open space, hard and soft landscaping and public realm works.'</u></p> <p>PTAL Rating The site has a mixed PTAL rating. Around the University of Westminster campus, the PTAL ranges from 4 to 5. It then decreases to PTAL 3 and 4 around the Northwick Park Hospital, dropping to 2 at Northwick Park Hospital Residential Accommodation and Northwick Park sports pavilion. <u>2-5 (current), 2-6a (2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> Adjoining the Growth Area to the east and south is Northwick Park. Designated as Metropolitan Open Land (MOL), <u>which</u> it is afforded the same protection as Green Belt in Policy G3 of the London Plan. Located within the boundary of Northwick Park is a 	

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			<p>sports pavilion. It is proposed that the sports pavilion is relocated, possibly to create an active frontage between the station and hospital, but the location could vary. This will also create a more open feeling across the park. Any MOL land swap as part of the relocation of the sports pavilion should ensure that there is no net loss of MOL area. The value of the land designated as MOL should also be improved, having regard to all criteria in Part B of London Plan Policy G3.</p> <ul style="list-style-type: none"> • London Plan Policy H10 does not allow loss of existing affordable housing unless replaced by equivalent or better quality accommodation that is of equivalent floorspace and price to occupiers. • Policy H5 requires public sector land development to deliver at least 50 per cent affordable housing. • There is potential for some tall buildings, subject to being a high quality design. These should respond to the height of the existing hospital buildings, stepping down towards the MOL and areas to the north. Consideration should also be given to impact on the locally protected views as identified in the <u>Plans of Harrow (Country Park at Wood Farm setting corridor) and Barnet (Golders Hill Park toward Harrow on the Hill)</u>. The appropriate height, extent and location of buildings will be identified within a masterplan for the site. Consideration will need to be given to the site's location next to MOL to ensure that there is no inappropriate impact on its setting. Part of the site also falls within the Ministry of Defence (MOD) safeguarding zone for RAF Northolt, in which the MOD will need to be consulted if development is over a certain height – 45.7m for development that occurs within the boundaries of the University of Westminster Campus and the majority of the 	

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			<p>hospital campus, and 91.4m for the land owned by Network Homes which includes the hospital's eastern car parks and residential accommodation.</p> <ul style="list-style-type: none"> • Furthermore, there is an area of The green space located to the rear of the student accommodation, which has an open space designation. Whilst it might be appropriate through the masterplanning and development process to relocate or disaggregate this open space, overall <u>No net loss of open space</u> will be acceptable. This will be in addition to satisfying the urban greening requirements and providing sufficient children's play space, in line with London Plan policies G5 and S4. • A ball strike assessment will <u>be required 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. • Running adjacent to the site's southern boundary is the Capital Ring leisure route. Development should not impact upon the functionality of the <u>adjacent</u> Capital Ring, and should seek its enhancement wherever possible. • Adjoining the site to the south west is Ducker Pool, a Site of Importance for Nature Conservation (SINC) (Grade I), also subject to a group Tree Preservation Order. The Growth Area's increase in residents could add to its recreational use as a nature conservation asset. Mitigation measures to address potential adverse impacts should be identified as part of the masterplanning process and ideally improvements to biodiversity implemented to enhance its SINC status. <u>Impacts of development upon the SINC should be mitigated, with enhancements to its biodiversity value sought, including</u> 	

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			<p><u>consideration toward its recreational use as a nature conservation asset.</u></p> <ul style="list-style-type: none"> • The western part of the site is within an Air Quality Management Area. As such <u>as a Growth Area</u> development should be air quality positive. • Vehicular access to the site is from Watford Road. This is often congested with traffic moving between Harrow and Wembley areas. Development should not exacerbate this <u>the congestion on Watford Road,</u> and ideally new junction solutions will improve it. • Within the site is a 'ring road'. This provides emergency services access to the A&E department. Development must ensure satisfactory vehicle (including emergency) movement is maintained. • South Kenton has poor pedestrian access to the site. Furthermore, Northwick Park station's access is via a narrow brick tunnel. <u>Pedestrian access to the site from South Kenton in particular should be enhanced, including from Northwick Park Station which will need</u> No-step free access is currently available to <u>all</u> platforms. Development should seek to address these issues. • An interchange incorporating a suitable bus turning point, stand and associated driver facilities will need to be incorporated into the development. This will <u>to</u> improve the connection between the underground and buses and potentially transfer bus routes from the surrounding road network north of Northwick Park Station. • None of the site is within Flood Zone 3 for fluvial flooding. Parts of the site are however in <u>surface water flood zone</u> 3 for surface water flooding, the majority being highway land. In the 	

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			<p>south of the site, flooding from potential reservoirs failure exists. Some northern parts are susceptible to sewer flooding. More detailed assessment will be required through a site specific flood risk assessment.</p> <p>Risks</p> <ul style="list-style-type: none"> • A number of infrastructure requirements are necessary to support the delivery of the scheme. The costs of these could result in delays to delivery. <u>The site's access road needs improvements for which</u> the site has been awarded a £9.9 million Housing Infrastructure Fund (subject to contract), which will assist with its delivery. Subsequent delivery will need to meet short deadlines. • Continued operation of hospital functions during construction phase. Prior to the redevelopment of operational land, existing uses will need to be decanted to other areas. Therefore, re-provision of these uses on other land (i.e. <u>hospital facilities,</u> staff car parks, student accommodation or Trust accommodation) will be needed, which places greater need on the phasing of this development to be considered carefully. <u>requiring careful consideration of phasing.</u> <p>Infrastructure Requirements</p> <p>Social and physical infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site.</p> <ul style="list-style-type: none"> • Upgrades to the junction at Watford Road will be needed to support development at this site. • Improvements to the capacity of, and pedestrian accessibility to, Northwick Park Station. 	

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			<ul style="list-style-type: none"> Improved sports and leisure facilities as part of the MOL land swap, green infrastructure and public realm throughout the site. A site wide energy network. An infrastructure agreement will be drawn up and signed by all four key partners. 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 being required to meet additional demands created through the development. 	
MM43	5.4 North West	BNSA1, page 146	<p><i>Amend parts of the policy to read:</i></p> <p>Timeframe for Delivery 10-5 Years 56-10 Years 101+ Years 150 <u>100</u> <u>50</u></p> <p>Ownership Private and small part public ownership</p> <p>PTAL Rating The sites PTAL rating ranges from 4-5; PTAL rating of 5 is in the northern region of the site, covering the majority of the supermarket building. 4-5 (current), 5-6a (2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site forms part of the primary frontage of Kenton Town Centre, and as an anchor the supermarket is a significant draw. As such its retention, or a replacement of equivalent size is sought. The supermarket's relationship to the town centre 	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs and consideration of impacts of railway.

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			<p>ideally needs to be greatly improved through the positioning of its entrance and creation of active frontage along its northern and eastern boundary. This will ensure it makes a stronger and wider contribution to the vitality and viability of Kenton Town Centre.</p> <ul style="list-style-type: none"> • <u>If parking is provided it should be made publicly available and be designed to serve the wider town centre.</u> • The streetscape, particularly the mini-roundabout on Nash Way is an insensitive over-engineered solution that <u>to the north and east</u> provides a poor townscape and pedestrian environment. <u>and needs to be improved</u> this needs to be part of a development solution. • There is an area of undesignated green space to the east of the site. Improvements to this area of <u>the</u> green space <u>to the east of the site</u> should be sought as part of any redevelopment. • <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> • The location next to the West Coast Mainline/ Overground and Underground lines to the west will require appropriate mitigation to ensure occupants of any development are not adversely impacted by noise and vibration. The railway is also a designated wildlife corridor. Development should not adversely impact upon this. Urban greening elements should be included within the development to enhance and complement this feature. • The site is susceptible to sewer and groundwater flooding. A small area of the north western corner is susceptible to surface water flooding. A flood risk assessment will need to be 	

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			<p>submitted which demonstrates how the development will mitigate against flood risk.</p> <ul style="list-style-type: none"> Part of the site is located within an Air Quality Management Area. Development will need to be air quality positive. A transport assessment will be required to determine the impact that residential development may have on this site. <p>Design Principles</p> <ul style="list-style-type: none"> The entrance to the store should have a greater focus on addressing Kenton town centre. Active frontage should be created along the northern and eastern edges along Nash Way and Draycott Avenue. The site's visibility from Kenton Road requires a high quality/ landmark design for the northern edge of the site. The general character of the surrounding residential area is 2 storeys. 3 storey buildings are located to the north along Kenton Road. The large site, together with its proximity to a town centre and public transport accessibility will allow for some greater height than existing of around 5 storeys in parts, subject to appropriate step down/ relationships to homes along Draycott Avenue. Development should incorporate green infrastructure, particularly adjacent to the wildlife corridor. This should enhance the natural and ecological value of this area but also help mitigate poor air quality. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> An appropriate amount of car parking spaces will need to be retained for the superstore. 	

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			<ul style="list-style-type: none"> Improved access arrangements/ public realm should be informed by design and access statement/ transport assessment. Incorporation of green infrastructure on the site. 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 being required to meet additional demands created through the development. 	

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MM44	5.5 South Place	Opportunities, page 152	<p><i>Amend second point in opportunities to read:</i></p> <ul style="list-style-type: none"> Improve Stonebridge Park gateway through redevelopment <u>of the Argenta House/Wembley Point and Unisys/Bridge Park sites. Unisys/Bridge Park presents the potential for a comprehensive redevelopment to replace the existing redundant tall buildings next to the North Circular and provide a scale of enabling development to support provision of a modern leisure centre with swimming pool.</u> 	Additional text necessary for greater clarity
MM45	5.5 South Place	BP5, page 154-155	<p><i>Amend part e) and part g) of 'Homes' of policy to read:</i></p> <p>e) A minimum of 4,900 additional homes in the period to 2041. Church End Growth Area, providing over 1,300 new homes, will be extended to include adjoining industrial sites and a masterplan produced</p>	To make consistent with London (Policy HC5) and national policies. Provide clarity on status of creative industries strategic, housing delivery numbers across the Places, provide housing figure for designated

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			<p>to guide its improvement to a mixed use neighbourhood.</p> <p>f) The final phases of Stonebridge Park will be completed.</p> <p>g) The Harlesden Neighbourhood Plan provides policies and guidance on sites for housing and mixed-use development in the Harlesden Neighbourhood Area. <u>A minimum 797 dwellings should be provided in the Harlesden Neighbourhood Plan Area in the period to 2041.</u></p> <p><i>Amend part h) of 'Town Centres' of policy to read:</i></p> <p>h) Harlesden town centre's retail and evening economy offer will be protected and enhanced. New convenience <u>and in the period to 2028 provide up to 4,800sqm of net comparison retail floorspace, and 900sqm convenience foods</u> retail floorspace. This will <u>should</u> be directed <u>towards Church End and</u> Harlesden town centres.</p> <p>i) Church End town centre will provide convenience retail for local communities, including a market.</p> <p><i>Amend part j), part k) and part l) of 'Employment and Skills' of policy to read:</i></p> <p>Supporting the local economy through:</p>	neighbourhood plan areas, reflect the Retail and Leisure Needs study (EB_E_06), reflect social infrastructure as sought by CCG.

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			<p>j) Co-location of employment industrial and residential uses at Church End Locally Significant Industrial Sites, subject to the requirements in policy BE2.</p> <p>k) Retaining and encouraging intensification of employment industrial uses at Brentfield Locally Significant Industrial Site.</p> <p>l) Supporting the <u>research into a 'Creative Cluster' and establishment of a Creative Enterprise Zone within Quarters at Harlesden, in accordance with London Plan Policy HC5 'Supporting London's Culture and Creative Industries'</u>. Within Creative <u>Clusters</u> Quarters proposals to redevelop local employment sites will be required to re-provide high quality affordable workspace on site in accordance with policy BE3.</p> <p><i>Add new part m)(i) and amend 'Community and Cultural Facilities' of policy to read:</i></p> <p><u>m)(i) 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></p> <p>m) A new high quality indoor leisure facility with swimming pool provision will be secured on the Unisys Bridge Park site.</p> <p>n) Protect playing pitch facilities at Tokyngton and Gibbons Recreation Ground.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>o) A new 6 form of entry secondary school and college will be secured on the Chancel House site.</p> <p>p) A new space within Church End Growth Area to serve as an employment, community and health hub. <u>Through masterplanned development within the Church End Growth Area, built space accommodating workspace, a multi-use community centre, and a primary care health centre (subject to needs assessed in collaboration with the borough Clinical Commissioning Group) will be secured.</u></p>	
MM46	5.5 South Place	5.5.21, page 157	<p><i>Amend last sentence to read:</i></p> <p>Increased population will give rise to the need for a <u>multi-use community centre and health hub a primary care health centre (subject to needs assessed in collaboration with the borough Clinical Commissioning Group)</u> in Church End Growth Area.</p>	Necessary to ensure text is consistent with policy BP5
MM47	5.5 South Place	BSGA1, pg. 159	<p><i>Amend second paragraph of policy to read:</i></p> <p>The redevelopment of industrial sites for co-location will secure investment in new employment industrial floorspace and improve environmental quality.</p> <p><i>Amend fourth paragraph of policy to read:</i></p> <p>The West London Orbital will improve the connectivity of Church End to the wider borough and Central London.</p>	Consistency with the London Plan, Local Plan policy BP5 and the updated Housing Trajectory.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Church End Growth Area will deliver 1,040 over 1300 new homes to 2041, supported by social and physical infrastructure to include:</p> <ul style="list-style-type: none"> A new space to serve as workspace employment, multi-use community centre, and health hub a primary care health centre. A new 6 form of entry secondary school and college on the Chancel House site New play facilities within developments Enhancements to Church End Open Space and Willesden Jewish Cemetery Increased greening through tree planting and the creation of new open space within site allocations 	
MM48	5.5 South Place	BSSA1, page 162 - 163	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Mixed-use residential, employment industrial and supporting community facilities</p> <p>Indicative Capacity: 380 414</p> <p>Timeframe for Delivery: 0-5 1-5 Years 34 5-10 6-10 Years 120 10+ 11+ Years 380 260</p> <p>PTAL Rating:</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BSGA1, Policy BE2 and Policy BE3) and London Plan policies, incorporate essential infrastructure needs and industrial re-provision and make clear the principle of masterplan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>3/4 3-4 (current and 2031 estimate). West London Orbital could uplift by 1.</p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> <p>Whilst the west of the site was in 2011 allocated for mixed-use light industrial/managed affordable workspace and residential, the e<u>The premises west of Dalmeyer Road are a local employment site, and the east of this site all of this allocation is now designated as a Locally Significant Industrial Site (LSIS).</u></p> <p>Redevelopment will be consistent with London Plan policy E7 and Brent Local Plan policy BE2 and BE3. It will be subject to a masterplan-led approach, demonstrating comprehensive development will result in a net increase in employment <u>overall industrial floorspace totalling the maximum viable that can be achieved from the existing local employment site, and from the LSIS a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater.</u></p> <p><u>Developments of non-industrial uses will not be permitted until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace across the site. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u></p> <p><u>If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development</u></p> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered.</u></p> <ul style="list-style-type: none"> It will result in development of a high quality design that effectively manages and mitigates any potential conflict between uses and a high standard of amenity achieved. Given the land ownership tThere is potential for the Asiatic Carpets site to come forward as a first phase. This would be subject to it being demonstrated it would not prejudice the delivery of a comprehensive masterplan for the site allocation or the operation of Cygnus Business Park. It would need to be demonstrated the Asiatic Carpets site in isolation would meet policy requirements, including an increase in industrial floorspace. The site is bounded by soft landscaping to the west, including a number of mature trees. The site itself comprises expanses of impermeable surfaces, which contributes to surface water flooding. There are areas surrounding the warehouse within flood zone 3a due to surface water flooding. A Flood Risk Assessment and appropriate mitigation will be required. As with the majority of Brent the site is located wWithin an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • A health, community and enterprise hub will be needed to meet the needs of the population as set out in policy BSGA1 Church End Growth Area. • The site has a PTAL of 3-4, but this could increase on implementation of the West London Orbital, <u>giving the potential for car free development</u>. The closest station is Neasden Station less than 400m away, and regular bus services stop on the site boundary. • The south west corner of the site lies within an Area of Archaeological Interest. Any proposals at this location should be accompanied by the appropriate assessments in order to identify the archaeological potential and the significance of the likely archaeological impact. <p>Design Principles:</p> <ul style="list-style-type: none"> • Development must be subject to a comprehensive masterplan led approach. • Piecemeal development which would prejudice the delivery of a wider masterplan will be refused. • The masterplan must demonstrate a <u>Demonstration of</u> high quality of design and <u>amenity, and</u> that any potential conflicts between uses can be mitigated and a high standard of amenity achieved. • Development should on its edges successfully relate to the scale of existing residential development to the north and west, <u>with a setback and active frontage introduced to the west facing Chapel Close.</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • withAppropriate heights and density will be determined through a masterplanning exercise. • The warehouse currently presents a blank façade to housing on Chapel Close. To be sensitive to the adjoining residential, development should be set back from Chapel Close and provide an active frontage. • Mature trees to the west should be retained and soft landscaping reinforced. • Sustainable Drainage Systems will be required to help mitigate surface water flooding. <p>Infrastructure Requirements:</p> <ul style="list-style-type: none"> • The location of the primary health care centre, community centre and workspace as set out in BSGA1 will be determined through the masterplanning exercise. • Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process. <p>Justification</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area further and its connectivity to Central London. Currently the site is underutilised. Given its accessibility and proximity to facilities at Church End Town Centre it is a sustainable location for higher density <u>mixed-use development that provides for new residential dwellings and appropriate amounts of high quality industrial space to meet needs.</u> For development to be in conformity with London Plan policy, including the requirement for Brent to provide increased employment capacity mixed-use development will be subject to a net increase in employment floorspace in addition to other criteria outlined in E7, BE2 and BE3. 	
MM49	5.5 South Place	BSSA2, page 164-165	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Housing, employment <u>industrial</u> and supporting community facilities</p> <p>Indicative Capacity:</p> <p>Timeframe for Delivery: 0-5 <u>1-5</u> Years 5-10 <u>6-10</u> Years 10+ <u>11+</u> Years 160</p> <p>PTAL Rating:</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BSGA1) and London Plan policies, incorporate essential infrastructure needs and industrial re-provision and make clear the principle of masterplan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>2/42-4 2-4 (current and 2031 estimate). West London Orbital could uplift by 1</p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> Designated a Locally Significant Industrial Site, consistent with London Plan policy E7 and Brent Local Plan policy BE2 redevelopment will be subject to a masterplan-led approach. This will demonstrate comprehensive development will result in <u>a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater.</u> a net increase in employment floorspace, development of a high quality design and that any potential conflict between uses can be managed and mitigated and a high standard of amenity achieved. <u>Developments of non-industrial uses will not be permitted on the LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> <u>If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered.</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • The Jewish Cemetery to the south of the site is Grade II Listed. • The north west corner of the site lies within an Area of Archaeological Interest. Any proposals at this location should be accompanied by the appropriate assessments in order to identify the archaeological potential and the significance of the likely archaeological impact. • As with the majority of Brent the site is located wWithin an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive. • The site itself comprises expanses of impermeable surfaces, which contributes to surface water flooding. Parts of the road network are within flood zone 3a due to surface water flooding. A Flood Risk Assessment and appropriate mitigation will be required. • A health, community and enterprise hub will be needed to meet the needs of the population as set out in policy BSGA1 Church End Growth Area. • The site has a PTAL of 2-4, but this could increase on implementation of the West London Orbital, giving the potential for car free development. The closest stations are Dollis Hill and Neasden Stations less than 500m away, and regular bus services run from the High Road. • A number of mature trees are located along Cobbold Road and in the B&M supermarket car park. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Design Principles:</p> <ul style="list-style-type: none"> • Development must be subject to a comprehensive masterplan-led approach. • Piecemeal development which would prejudice the delivery of a wider masterplan will be refused. • The masterplan must demonstrate a Demonstration of high quality of design and amenity, and that any potential conflicts between uses can be mitigated and a high standard of amenity achieved. • Development should successfully relate to the scale of existing residential development to the east, <u>with a set back and active frontage introduced where there is currently a blank wall, in Cobbold Road.</u> • Appropriate heights and density will be determined through a masterplanning exercise. • Development should be sensitive to the setting of the Grade II Listed Jewish Cemetery. Heights will need to be informed by an assessment of impact on views from the cemetery. • The development currently presents a blank wall along Cobbold Road. To be sensitive to the adjoining housing, development should be set back from Cobbold Road and provide an active frontage. • <u>Mature trees located along Cobbold Road and in the B&M supermarket car park should where possible be retained and soft landscaping reinforced.</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> <u>Sustainable Drainage Systems will be required to help mitigate surface water flooding.</u> <p>Infrastructure Requirements:</p> <ul style="list-style-type: none"> The location of the <u>primary</u> health <u>care centre</u>, community <u>centre</u> and <u>workspace as set out in BSGA1</u> will be determined through the masterplanning exercise. Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process. <p>Justification</p> <ul style="list-style-type: none"> The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area further and its connectivity to Central London. Currently the site is underutilised. Given its accessibility and proximity to facilities at Church End Town Centre it is a sustainable location for higher density <u>mixed-use</u> development <u>that provides for new residential dwellings and appropriate amounts of high quality industrial space to meet needs.</u> For development to be in conformity with London Plan policy, including the requirement for Brent to provide increased employment capacity mixed-use development 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			will be subject to a net increase in employment floorspace in addition to other criteria outlined in E7, and BE2.	
MM50	5.5 South Place	BSSA3, page 166-167	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery: 0-5 1-5 Years 99 5-10 6-10 Years 10+ 11+ Years 96</p> <p>Address: Church Road, NW10 2ET 9NP</p> <p>PTAL Rating: 2/3 2-3 (current and 2031 estimate). West London Orbital could uplift by 1</p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> The parade is designated secondary frontage. Redevelopment will need to retain active frontages at ground floor. As secondary frontage, there is flexibility on the range of uses which could include retail, leisure, community and employment. Workspace will be sought as part of any redevelopment. <u>Provision of a new market should be in accordance with the requirements of policy BE8 – Markets and Car Boot Sales.</u> 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE8 and Policy BSGA1) and London Plan policies, incorporate essential infrastructure needs and address flood risk.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • The parade includes a dentist which is needed to meet local healthcare needs. Space for a dentist will need to be retained unless re-provision in suitable alternative premises within walking distance occurs. • A health, community and enterprise hub will be needed to meet the demands of the new population as set out in policy BSGA1 Church End Growth Area. • Church Road and Eric Road are within flood zone 3a due to surface water flooding. Development should seek to reduce surface water runoff by maximising planting and through SuDS. <u>A Flood Risk Assessment and appropriate mitigation will be required.</u> • As with the majority of Brent the site is located w <u>W</u>ithin an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive. • The site has a PTAL of 2/3, but this could increase on implementation of the West London Orbital. The closest stations are Dollis Hill and Neasden Stations less than 500m away, and regular bus services run from the High Road. • St Mary's Church to the north is a Grade II Listed building. The church hall and cottages are locally listed. • The site lies within an Area Priority Area and the eastern corner of the site within a Site of Archaeological of Importance. Any proposals at this location should be accompanied by the appropriate assessments in order to 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>identify the archaeological potential and the significance of the likely archaeological impact.</p> <p>Design Principles:</p> <ul style="list-style-type: none"> • Development should create an active frontage on to Church Road. • Building heights should complement the southern parade which is predominantly 3 storeys in height and adjacent developments such as Canaletto Court which is 6 storeys. There is potential for higher development of up to 6 storeys at corner sites. • Given Church End Town Centres heavily urbanised character the open space to the west of the parade should be enhanced and planting increased there and elsewhere through measures such as reducing surface water through SuDS. • Currently buildings turn their back on Church End Open Space and St Mary's Church. There is an opportunity to create a stronger frontage with views towards the church. • Development should be sympathetic to the setting of Grade II listed St Mary's Church and the associated locally listed buildings. <p>Infrastructure Requirements:</p> <ul style="list-style-type: none"> • The location of the primary health care centre, community centre and workspace as set out in BSGA1 will be determined through the masterplanning exercise 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Justification</p> <ul style="list-style-type: none"> • The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area and its connectivity to Central London. • Currently the site is underutilised, and given its accessibility it is a sustainable location for higher density development. • A new market, commercial space and housing will help to revitalise the centre, as will environmental improvement. 	
MM51	5.5 South Place	BSSA4, page 168-169	<p>Allocated Use: Mixed-use housing, employment industrial and supporting community facilities</p> <p>Indicative Capacity: 200 300</p> <p>Timeframe for Delivery: 0-5 1-5 Years 5-10 6-10 Years 200 10+ 11+ Years 200 100</p> <p>PTAL Rating: 4/-5 (current and 2031 estimate)</p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> • The site is a designated Locally Significant Industrial Site. Consistent with London Plan policy E7 and Brent Local Plan policy BE2 redevelopment will be subject to a 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BSGA1) and London Plan policies, incorporate essential infrastructure needs, industrial re-provision, and make clear the principle of masterplan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>masterplan-led approach, demonstrating comprehensive development will result in <u>a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater.</u> a net increase in employment floorspace, development of a high quality design and that any potential conflict between uses can be managed and mitigated and a high standard of amenity achieved.</p> <ul style="list-style-type: none"> • <u>Developments of non-industrial uses will not be permitted in the LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • <u>If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered.</u> • The site itself comprises includes expanses of impermeable surfaces and lacks soft landscaping, which contributes to surface water flooding. Parts of the road network and open storage are within flood zone 3a due to surface water flooding. A Flood Risk Assessment and appropriate mitigation will be required. • As with the majority of Brent the site is located wWithin an Air Quality Management Area; Major developments 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>within Growth Areas are required to be Air Quality Positive.</p> <ul style="list-style-type: none"> • A health, community and enterprise hub will be needed to meet the needs of the population as set out in policy BSGA1 Church End Growth Area. • The site has a PTAL of 4/ to 5, but this could increase on implementation of the West London Orbital, giving the potential for car free development. Dollis Hill Station is less than 300m to the east, and Neasden Station less than 600m to the north. Regular bus services run from the High Road and Dudden Hill Lane. <p>Design Principles:</p> <ul style="list-style-type: none"> • Development must be subject to a comprehensive masterplan-led approach. • Piecemeal development which would prejudice the delivery of a wider masterplan will be refused. • The masterplan must demonstrate a Demonstration of high quality of design and amenity, and that any potential conflicts between uses can be mitigated and a high standard of amenity achieved. • The site is bounded by two-storey housing. Development will need to consider be sensitive to impacting on the amenity of surrounding 2-storey properties and successfully relate to their scale. Appropriate heights and density will be determined through a masterplanning exercise. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The development currently presents a blank frontage to Colin Road and Dudden Hill Lane, whilst vehicle repair businesses utilise Colin Road and contribute to a cluttered environment. There is an opportunity for development to significantly improve the quality of the environment by creating <u>an active frontages to Colin Road and Dudden Hill Lane</u>. Development should increase soft landscaping and increase tree planting along Dudden Hill Lane. <p>Infrastructure Requirements:</p> <ul style="list-style-type: none"> The location of the <u>primary health care centre</u>, community <u>centre</u> and <u>workspace as set out in BSGA1</u> will be determined through the masterplanning exercise. Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward prior to the development creating identified additional capacity requirements. The developer is encouraged to work with Thames Water early on in the planning process. <p>Justification</p> <ul style="list-style-type: none"> The site is currently of a low quality townscape. It presents a blank frontage on to Dudden Hill Lane which makes the area feel unsafe. Whilst garages to the south contribute to street clutter and congestion on Colin 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Road. There is an opportunity to improve the quality of the environment in this location through development.</p> <ul style="list-style-type: none"> The site is located in a high PTAL location. The West London Orbital will further improve the PTAL of this area and its connectivity to Central London. Currently the site is underutilised. Given its accessibility and proximity to facilities at Church End Town Centre it is a sustainable location for higher density <u>mixed-use</u> development <u>that provides for new residential dwellings and appropriate amounts of high quality industrial space to meet needs.</u> For development to be in conformity with London Plan policy, including the requirement for Brent to provide increased employment capacity mixed-use development will be subject to a net increase in employment floorspace in addition to other criteria outlined in E7, and BE2. 	
MM52	5.5 South Place	BSSA5, page 170-171	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Re-provision of bus depot and public house or employment <u>industrial</u> uses with residential above.</p> <p>Timeframe for Delivery 0-5 <u>1-5</u> Years 56 5-10 <u>6-10</u> Years 110+ 10+ <u>11+</u> Years</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3, Policy BHC1 and Policy BGI2) and London Plan policies, incorporate essential infrastructure needs, address impacts on existing transport infrastructure, provide clarity on alternatives to bus depot.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Ownership: Public/Private</p> <p>PTAL Rating: 5 to 6 <u>(current and 2031 estimate)</u></p> <p>Planning Considerations:</p> <ul style="list-style-type: none"> • <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> • <u>As a Local Employment Site maximum re-provision of floorspace to include research and development, light industrial and storage and distribution will be required if there is no need for a bus depot on site.</u> • The site itself includes an Edwardian entrance incorporating a war memorial and The Crown Public House (335 High Road) which is a non-designated heritage asset. To the west of the site is the Grade II Listed Willesden Jewish Cemetery, This has recently been awarded Heritage Lottery Funding to restore key features and open a visitor's centre. There are views from the site into the Jewish Cemetery from upper floors. The locally listed Willesden Seventh-Day Adventist Church is located to the north-east of the site. There are also a number of other non-designated heritage assets in the surrounding area which make a positive contribution to local 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>character, including Willesden Deeper Life Christian Centre (344 High Road), a single storey ragstone chapel, and No.8 Public House (305 High Road).</p> <ul style="list-style-type: none"> • Policy BHC5 of the Local Plan protects public houses and would apply to The Crown Public House. Should the loss of the public house use be justified under policy BHC5, the preferred alternative use is employment light industrial maker floorspace, with the potential for some residential above. This would contribute to the existing workspace cluster in the area and complement the town centre uses on the high road. • The site is accessible via Pound Lane and from the High Road via Churchmead Road. <u>The site has high PTAL which means development should be car free.</u> It is well served by public transport. Regular bus services operate from the High Road and Pound Lane, and Dollis Hill Tube Station on the Jubilee Line is less than a 10-minute walk away. • As with the majority of Brent the site is located w <u>W</u>ithin an Air Quality Management Area; Major developments within Growth Areas are required to be Air Quality Positive. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Part of the site falls within flood zone 3a due to surface water flooding. A Flood Risk Assessment will be required. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> There are four mature trees located along the northern and eastern boundary of the site. <p>Design Principles</p> <ul style="list-style-type: none"> Development should respond to the predominant character of the area, which is two to four storeys in height, and Development should on it's <u>the south edge should</u> successfully relate to the scale of existing <u>adjacent</u> two storey terraced housing to the south, whilst there are opportunities for taller elements fronting the High Road and Pound Lane. <u>Demonstration of high quality of design and amenity, and that any potential conflicts between uses can be mitigated.</u> Development should also take account of <u>Positively addressing the site's heritage assets including the locally listed Edwardian bus depot entrance incorporating a war memorial and The Crown Public House and those</u> surrounding heritage assets <u>including the Grade II listed Jewish cemetery, and the locally listed Willesden Seventh-Day Adventist Church, Willesden Deeper Life Christian Centre (344 High Road) and No.8 Public House (305 High Road) and</u> the effect on their special architectural and historic interest. A heritage statement will be <u>required.</u> necessary and although the site has potential for taller, well-designed buildings, this will need to take account of the setting of the listed cemetery as well as the general streetscene. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The development should take influence from the positive characteristics of the surrounding buildings and structures. In particular, the retention and consideration of the Edwardian Bus Depot entrance, war memorial and The Crown Public House is encouraged. <u>Tree planting along the northern and eastern boundary of the site should be retained and reinforced.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> No site specific infrastructure requirements, beyond retention of the bus depot and associated vehicular access. <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> <p>Justification</p> <ul style="list-style-type: none"> The site is located in an area of high public transport accessibility with good access to local services, making it a sustainable location for residential development. There is an opportunity to enhance the character of the area, including the setting of the Grade II listed cemetery and optimise the use of the site through a 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>mixed-use development comprising residential and a re-provided bus depot <u>or a range of industrial uses.</u></p> <ul style="list-style-type: none"> Crown Public House is a long-term vacant building which is in a poor state of repair and detracts from the streetscene. 	
MM53	5.5 South Place	BSSA6, page 172-173	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Residential, <u>with potential for</u> affordable workspace, supporting community and cultural uses and small scale retail.</p> <p>Indicative Capacity 540<u>569</u></p> <p>Timeframe for Delivery 01-5 Years 440<u>569</u> 56-10 Years 100 110+ Years</p> <p>Planning History: Prior approval to convert Wembley Point to 439 residential units (18/3125) Prior approval Wembley Point (17/0729) Prior approval Wembley Point (16/4944) Planning applications <u>permissions</u> to clad Wembley Point. (18/4535 & 17/3244) Planning <u>permission</u> application to develop 130 residential units on Argenta House site. (18/4847)</p>	<p>To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies. Incorporate essential infrastructure needs, employment re-provision, clarity on need for modelling due to the flood risk on site and address impacts on existing transport infrastructure.</p> <p>Text on masterplan unnecessary as acceptable development can come forward on the two separate sites.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>PTAL Rating 4 <u>(current and 2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is directly adjacent to the North Circular Road, a major source of air and noise pollution. • As with the majority of Brent the site is - Located within an Air Quality Management Area. As a minimum development is to be Air Quality Neutral. • Wembley Brook and River Brent are potential sources of flooding and the majority of the site is within Flood Zone 3. Part of the site is within <u>including extensive flood zone 3b (functional floodplain). Development, other than water compatible uses, will not be acceptable within functional floodplain. Any flood modelling from applicants which seeks to justify a revision to the functional floodplain boundary will need to be agreed by the Environment Agency.</u> • More vulnerable uses should be restricted to areas of lowest flood risk and on upper floors. Ground floors should be designed to be resistant and resilient to flood risk. Basement dwellings will not be acceptable on the site. <u>Development must be informed by a detail Flood Risk Assessment and Drainage Strategy. reduce flood risk overall and not increase the risk of flooding on adjoining sites. Development must be</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u></p> <ul style="list-style-type: none"> • The area is heavily built up. Lack of landscaping, large expanses of car parking and the North Circular Road contribute to low permeability and accumulated surface water build up. • The railway trackside and Wembley Brook adjacent the site forms part of a wildlife corridor and Grade I Site of Importance for Nature Conservation. There is an opportunity to help reinforce the wildlife corridor through soft landscaping to the site. • The site has a PTAL of 4 being directly adjacent the Stonebridge Park Station and a bus stop. Car free development <u>should be the starting point for development</u> will be encouraged, subject to a Controlled Parking Zone being achieved. • Due to its current and historic industrial use there is potential for contamination and a preliminary risk assessment will be required, and if necessary site investigations. • The site <u>was until recently predominantly in employment use</u> contains a light industrial units. Re-provision of affordable workspace will be required to mitigate the loss of this unit. The London Plan identifies Brent as a 'provide capacity' borough in terms of industrial employment floorspace and as <u>As</u> such an increase in <u>provision of some</u> employment floorspace <u>affordable workspace</u> will be sought <u>on site, as part of</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>the potential uses associated with a new mixed use community.</u></p> <ul style="list-style-type: none"> • The site is adjacent to an existing local shopping parade at Harrow Road. Small scale complementary retail uses may be appropriate providing they support the vitality and viability of the existing <u>nearby parade at Harrow Road.</u> Given the scale of development community and cultural uses will be needed to serve the new community and promote social interaction. • The development will be heavily reliant on Stonebridge Park station which currently acts as an interchange for bus and rail travel. It has a poor public realm which needs to be improved, <u>subject to agreement being reached between the Council and landowners.</u> • Site is of sufficient size to incorporate BH3 Build to Rent and BH8 Specialist Older People's Housing policy requirements. <p>Design Principles</p> <ul style="list-style-type: none"> • The site is in a prominent location, highly visible from the North Circular and Stonebridge Park Station. Given its prominence <u>Therefore,</u> the highest architectural quality will be required. • <u>Development must mediate, in scale and layout, between the</u> A-cluster of taller buildings is located in this location, including the 7 storey Unisys buildings and 21 storey Wembley Point building, and the <u>However, to the north the site is bounded by two-storey housing to the north, and</u> The scale and layout must mediate 	

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			<p>between Wembley Point building and the surrounding low-rise buildings and mitigate any potential impacts.</p> <ul style="list-style-type: none"> • It is considered that this area <u>The site is within a Tall Buildings Zone and</u> is suitable for tall buildings, subject to <u>achieving</u> development integration ong well with the surrounding context <u>and character, and</u> being of a high quality design and respecting local character. • Development must be informed by a detail Flood Risk Assessment and Drainage Strategy. Development, other than water compatible uses, will not be acceptable within the functional flood plain. • Development elsewhere in the site will be subject to the Flood Risk Assessment demonstrating, through works to the Wembley Brook and other mitigation, development would be resistant and resilient to all relevant sources of flooding, reduce flood risk overall and not increase the risk of flooding on adjoining sites. • The Wembley Brook should become a feature which contributes to the character of the site and provides natural Sustainable Urban Drainage. Proposals should seek to naturalise the Wembley Brook to improve its ecological and landscape value <u>whilst also providing sustainable urban drainage.</u> • Tree planting and soft landscaping will be required to mitigate air quality impacts from the North Circular and increase permeability. 	

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			<ul style="list-style-type: none"> Development should create a strong pedestrian connection between Harrow Road and Stonebridge Park Station, through active frontage and public realm enhancements. Should Argenta House and Wembley Point come forward separately, it will need to be demonstrated through a masterplan approach this will not prejudice comprehensive development and the achievement of all policy requirements. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Flood mitigation. Improvements of the public realm/ interchange facilities at Stonebridge Park station and step-free access. <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> <p>Justification</p> <ul style="list-style-type: none"> The site benefits from good public transport access with a PTAL rating of 4. In its current state the sSite is of a poor environmental quality, with dated buildings. Redevelopment would improve the environmental quality of the area, help reduce flood risk and create an attractive gateway to the borough and Stonebridge. Draft London Plan policy requires Brent to provide additional employment floorspace capacity. Consistent 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>with this Brent's Local Plan policies allow redevelopment of Local Employment Sites such as Argenta House, subject to re-provision of employment floorspace as affordable workspace. An increase in employment floorspace will be sought.</p> <ul style="list-style-type: none"> • The development will introduce a significant level of high density residential development to the area. As such supporting e-Community and cultural facilities will be required as part of any development, to meet need and create opportunities for social interaction and integration. • The indicative capacity takes into account that the majority of the site is within functional floodplain and therefore not suitable for development. Should flood risk modelling approved by the Environment Agency result in changes to the extent of the functional floodplain, a higher level of development may be achievable. In such a scenario the design principles and policy considerations outlined would still apply. 	
MM54	5.5 South Place	BSSA7, page 175-176	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery: 01-5 Years 56-10 Years 275 110+ Years 230</p> <p>PTAL Rating: PTAL 3 and 4 (current and 2031 estimate)</p>	To increase brevity and make consistent approach across the housing trajectory, SFRA Level 2, Local Plan (Policy BD2 and Policy BT2) and London Plan policies. Incorporate essential infrastructure needs, industrial re-provision, Address public transport capacity and

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Planning Considerations</p> <ul style="list-style-type: none"> The provision of a new leisure centre on the site is required, to meet the need for indoor sports facilities in the borough, as set out in the Brent Indoor Sports and Leisure Needs Assessment. Small scale commercial and community uses will be acceptable where they meet the needs of the new community. The railway tracks to the south of the site are designated as a Wildlife Corridor and the trackside to the north of the tracks is a Grade I Site of Importance for Nature Conservation (SINC) (Harlesden to Wembley Central including Wembley Brook). Development of the site should seek to protect and enhance these sites. There are numerous Trees <u>on</u> which align the front of the site and currently form the perimeter of the leisure centre's car park, all of which should be retained if possible. As with the majority of Brent the site is <u>I</u>Located within an Air Quality Management Area. The adjacent North Circular Road is a major source of air and noise pollution. As a minimum development is to be Air Quality Neutral. The east section of the site, which is currently occupied by both the leisure centre and the former Sperry Univac building, was previously a bus station, and therefore has historical industrial use. In this case cContamination 	accessibility and make clear the principle of masterplan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>testing should be undertaken along with any necessary remediation works.</p> <ul style="list-style-type: none"> • The whole Site is designated as Flood Zone 3a (surface water). and Large expanses are designated as Flood Zone 3a (fluvial and tidal). The fluvial and tidal flooding concerns are due to the proximity to Brent river and its tributary Wembley Brook. • This is further exacerbated by the low permeability of the area which is also why the area is considered a surface water flood risk. The area is heavily built up with the North Circular Road and its junction with the A404, Stonebridge Park Station and numerous industrial areas all contributing to low permeability, and accumulated surface water build up. • It must be demonstrated that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction. <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> • With a PTAL of 3-4 4/3, the site is located within a 6-minute walk of Stonebridge Park Station, which is served by the overground and underground and within a 5-minute walk of 3 bus stops, each serviced by one bus. car free development will be encouraged, subject to a Controlled Parking Zone being achieved. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Site is of sufficient size to incorporate BH3 Build to Rent and BH8 Specialist Older People's Housing policy requirements. <p>Design Principles</p> <ul style="list-style-type: none"> A cluster of taller buildings is located on the western edge of the site, including the 8 storey Unisys buildings and, on the other side of the North Circular, the 21 storey Wembley Point building. <u>The site has been identified as part of a Tall Buildings Zone.</u> In this context higher density development of is appropriate, subject to being of high architectural quality, and providing a high standard of amenity: <u>and respecting local character.</u> Development will need to successfully mediate between the taller elements and scale of the south eastern border where it adjoins 2 storey residential housing on First Drive. The layout of development must will need to be informed by flood risk management and reduction, directing development to the areas at lower flood risk. Incorporating the theme of flooding mitigation, the site's Landscape<u>ing</u> should be enhanced, increasing greenery; and in the process, <u>permeability whilst reducing risk of flooding.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> <u>The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>and step free access improvements at Stonebridge Park station will be sought.</u></p> <ul style="list-style-type: none"> Improvements to the bus network may be required to increase PTAL and enable car free or car light residential development. Sustainable Urban Drainage Systems (SUDS) and flood mitigation will be required informed by the Flood Risk Assessment and Drainage Strategy. 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. <p>Justification</p> <ul style="list-style-type: none"> The site benefits from good public transport access, with a PTAL rating of both 3 and 4. and has In its current state the site is of a poor environmental quality, with dated buildings and the long-term vacant Unisys buildings. It contrasts with the attractive environment created elsewhere in Stonebridge through modern development. Redevelopment would improve the environmental quality of the area and create an attractive gateway to the borough and Stonebridge. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Comprehensive mixed-use development is needed to help facilitate a new leisure centre and to bring the Unisys buildings back in use. This site and the surrounding area would benefit greatly from redevelopment in terms of flood mitigation. 	
MM55	5.5 South Place	BSSA8, page 177	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Residential and employment industrial</p> <p>Comments: Consistent with policy BE3 an increase in employment the maximum viable amount of industrial floorspace will be sought as part of any redevelopment.</p>	Consistency with the London Plan and Local Plan Policy BE3.
	5.5 South Place	BSSA9, page 177	<p><i>Amend 'comments' of the policy to read:</i></p> <p>Comments: Consistent with policy BE3 an increase in employment the maximum viable amount of industrial floorspace will be sought as part of any redevelopment. Development should also take account of the surrounding heritage assets and the effect on their special architectural and historic interest. A heritage statement will be necessary. The retention of the Willesden Seventh-Day Adventist Church building and the former constitutional club is encouraged.</p>	Consistency with Local Plan Policy BE3.
	5.5 South Place	BSSA13, page 177	<p><i>Amend parts of policy to read:</i></p> <p>Indicative housing capacity: 1526</p>	Reflects minded to approve scheme.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM56	5.6 South East	BP6, page 184-185	<p><i>Amend part d) and add new part d) (i) to 'Homes' of the policy to read:</i></p> <p>d) <u>Minimum of 5,100 additional homes in the period to 2041, with an important component being</u> South Kilburn Growth Area, <u>which</u> will deliver approximately 3,400 <u>over 2,100</u> new high quality homes <u>(or, a minimum of 800 net additional homes once demolitions are taken into account)</u>, with a target of 50% affordable including social rented for existing secure tenants of South Kilburn <u>estate</u>.</p> <p><u>d i) Deliver a minimum of 348 new homes in the Kilburn Neighbourhood Forum area in the period to 2041.</u></p> <p>e) Kilburn Square as part of a mixed-use development including re-provision of the market and a new public square</p> <p><i>Amend part j) of 'Town Centres' of the policy to read:</i></p> <p>i) Enhance and protect Kilburn Town Centre's evening economy and comparison retail offer, including the creation of a food and drink cluster around the Kiln Theatre. Redevelopment of Kilburn Square is to provide a new market, retail floorspace and public square to act as a focal point for the centre.</p> <p>j) <u>In the period to 2028 provide up to 7,200 sqm net comparison retail floorspace, to be directed to Kilburn town centre in the first instance. Provide up to 7,500 sqm net convenience retail floorspace, 600 sqm café and restaurant floorspace, and 300 sqm drinking establishment floorspace across the town centres of</u> Cricklewood, Willesden Green, Queen's Park and Kensal Rise. will provide convenience retail for local communities in addition to a restaurant and café offer. New convenience retail floorspace of over</p>	To make consistent with London and national policies. Provide clarity on housing delivery numbers across the Places and provide housing figure for designated neighbourhood plan areas. Reflect the Retail and Leisure Needs study (EB_E_06), changes to Use Class Order and wider range of social infrastructure.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>500sqm will be in the first instance directed to Willesden Green and Cricklewood.</p> <p><i>Amend part k), Part l) and add new part l) (i) to 'Community and Cultural Facilities' of the policy to read:</i></p> <p>k) <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.</p> <p>l) Enhance and protect playing pitches <u>fields</u> at Gladstone Park and leisure provision at Willesden Green Sports Centre.</p> <p><u>l i) Promoting increased cultural and community use of the Gaumont State Cinema.</u></p> <p><i>Amend 'Employment and Skills' of the policy to read:</i></p> <p>Supporting the local economy by:</p> <p>m) Protecting and enhancing Queen's Park Creative <u>Cluster</u> Quarter and South Kilburn Enterprise Hub.</p> <p>n) Supporting the establishment of new Creative <u>Clusters</u> Quarters at Kilburn and Willesden Green.</p> <p>o) Within Creative Quarters <u>Clusters</u> proposals to redevelop local employment sites will be required to re-provide high quality affordable workspace on site in accordance with policy BE3.</p> <p>p) 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.</p>	

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MM57	5.6 South East Place	BSEGA1, page 189	<p><i>Amend last paragraph of policy to read:</i></p> <p>South Kilburn Growth Area will deliver approximately 3,400 over 2,100 new homes (or a minimum 800 net additional homes one demolitions are taken into account) to 2041, supported by social and physical infrastructure to include:</p>	To better reflect gross and net development within the South Kilburn growth area over the lifetime of the Local Plan.
MM58	5.6 South East Place	BSESA1, page 192-193	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 56-10 Years 110+ Years</p> <p>Address 1 -167 Austen House, Cambridge Road, NW6 5YL</p> <p>PTAL Rating 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site benefits from Good public transport accessibility levels, being in walking distance of Kilburn Park and Kilburn High Road Station mean a car free development should be the starting point. 	To increase brevity and make consistent approach with updated housing trajectory and Local Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Design Principles</p> <ul style="list-style-type: none"> Austen will be a perimeter block courtyard building ranging from 4-6 storeys. It will provide frontage to Cambridge Road, the extension of Percy Road, Stafford Road and the public realm between it and the new Blake Court development to the south. The scale and form of the development should seek to prevent north facing single aspect units. It should maximise sunlight and daylight to the courtyard and adjacent northern property through the lower storey heights being on the southern and northern sides of the perimeter blocks. It is proposed that The existing uses of Catholic Church and Community Centre should be being incorporated into the redevelopment, in relation to the Church this can be by the building remaining in situ or provision of a new building that incorporates the se church and community uses. <p>Justification</p> <ul style="list-style-type: none"> The block is of poor construction that it is not viable nor desirable to refurbish, The blocks sit within a poor quality landscape, of disparate open space and garages which can be replaced by Capacity for more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets. 	
MM59	5.6 South East Place	BESAS2, page 194-195	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 121 56-10 Years 110+ Years</p> <p>Address</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>1-72 Blake Court, Malvern Road, <u>NW6 5PW</u></p> <p>PTAL Rating 3-5 <u>(current and 2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area <u>and</u> As with the majority of Brent the site is located within an Air Quality Management Area <u>where</u> major developments within Growth Areas are required to be Air Quality Positive. A terrace of locally listed buildings are located to the west of the site along Malvern Road. The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> Blake will be a perimeter block building ranging in height from 4-8 storeys. It will provide <u>active</u> frontages to Cambridge Road, the extension to Percy Road and between the Dickens site to the north and McDonald House/Hampton Close site to the south. A new public pedestrian link will be provided on the southern frontage. <u>The development should positively address the setting of the terrace of locally listed buildings located to the west of the site along Malvern Road.</u> Taller elements up to 8 storeys to be integrated at key prominent frontages/corners on Malvern Road and Cambridge Road to indicate the new neighbourhood entrances. 	incorporate essential infrastructure needs and locally listed buildings.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The scale and form of the development should seek to prevent north facing single aspect unit and maximise sunlight and daylight to the courtyard. <p>Justification</p> <ul style="list-style-type: none"> Blake House redevelopment sites suffer from inherent internal design problems and the relationships between buildings, streets and spaces are also poor and indeterminate. The block is of poor construction that it is not viable nor desirable to refurbish, The blocks sit within a poor quality landscape. of disparate open space and garages which can be replaced by Capacity for more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets. 	
MM60	5.6 South East Place	BSESA3, page 196-197	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 116 56-10 Years 110+ Years</p> <p>Address 113-128 Carlton House and Carlton Hall, Denmark Road, NW6 5DX</p> <p>PTAL Rating 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where 	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>major developments within Growth Areas are required to be Air Quality Positive.</p> <ul style="list-style-type: none"> The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station <u>mean a car free development should be the starting point.</u> <p>Justification</p> <ul style="list-style-type: none"> The removal of another Carlton House block in association with the Peel development creates an opportunity to reinstate the traditional street pattern and clearly define street frontages <u>To give greater clarity about better identify and improve both</u> private and public <u>outdoor</u> spaces and improve tenants shared private space and Higher density development of currently <u>underutilised</u> make better use of land. which is developed to low densities. A new dedicated community hub is provided at Carlton and Granville Centre as part of the wider masterplan. 	
MM61	5.6 South East Place	BESAA4, page 198-199	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 56-10 Years 110+ Years</p> <p>Address Carlton Vale Infant School, Malvern Place, <u>NW6 5PX</u></p> <p>PTAL Rating <u>2 (current and 2031 estimate)</u></p> <p>Planning Considerations</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site is Currently occupied by a school. However, the school is to be relocated to another site within the Growth Area. <p>Design Principles</p> <ul style="list-style-type: none"> A frontage will be reinstated along Malvern Road that provides a transition in set-back distance from 121 Malvern Road and 17-32 Kilburn House, Malvern Place. This active frontage which will play a strong role in providing overlooking of South Kilburn Park will also turn the corner with and along Malvern Place. Building heights will range between 4 and 6 storeys. Malvern Road will be reinstated with sufficient space provided to ensure vehicles can turn into it from Malvern Place. This will form the principal vehicular route as it is proposed to close vehicular access between Malvern Road and Carlton Vale. Ideally no or very limited car parking shall be provided between the new building frontages and the highway and landscaping and planting should be improved If it is, greater attention should be paid to both softening its impact on in the street scene. incorporating better quality planting than exhibited at Nexus Court. <p>Justification</p> <ul style="list-style-type: none"> The site will become available f following completion of the move of the school to its new site on the Wordsworth and Masefield the site will allowing it to be predominantly be developed for residential purposes. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> In addition what was Formerly Malvern Road highway land will be improved as a pedestrian and cycleway to form a continuation of the street that links up with Malvern Place. 	
MM62	5.6 South East Place	BSESA5, page 200-201	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity 120-50 net (121 gross)</p> <p>Timeframe for Delivery 01-5 Years 20-121 56-10 Years 40071 1110+ Years</p> <p>Address 1-167 Dickens House, Malvern Road1-78 Craik Court, Carlton Vale, NW6 5HN</p> <p>PTAL Rating 5 increasing to 6a in 2031(current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station mean a car free development should be the starting point. <p>Design Principles</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • Create a Strong frontages along Carlton Vale, with active ground floor uses if viable, and frontage along Canterbury Road and Neville Close. • a Active ground floor uses if viable, with sufficient space for tree planting on Carlton Vale. • To Respond to the gateway context and heights of William Dunbar House / Peel and the land-mark Canterbury Road/Carlton Vale corner position by creating a tall building up to 14 storeys • whilst Dropping in height towards Peel to 4 storeys to provide variety on townscape and facilitate daylight/sunlight to the buildings that will run along the Canterbury Road frontage. <p>If commercial frontage is provided this will be expected to be on the pavement edge, but sufficient space must be provided to facilitate tree planting defining Carlton Vale's boulevard status/typology.</p> <p>Justification</p> <ul style="list-style-type: none"> • Poor quality residential block which it is neither viable nor desirable to refurbish. • The opportunity exists to create a stronger corner which will act as a gateway to South Kilburn • to Continue ation of a commercial ground floor use from Queen's Park to Peel (if viable) • whilst continuing the step change in Improving the quality of mixed use and mixed tenure residential accommodation. 	
MM63	5.6 South East Place	BSEA6, page 202-203	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery</p> <p>01-5 Years 45</p> <p>56-10 Years 100</p> <p>110+ Years</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Address 1-85 Crone Court, Denmark Road, NW6 5BX and 1-10 Zangwill House Rupert Road Carlton Vale, NW6 5BY, Canterbury Road</p> <p>Description of Existing Site A more traditional Traditional, but poor quality, 1950s residential blocks of 12 and 4 storeys, facing onto a communal private/ semi-public space. in poor quality. Crane is a 12-storey block of 85 dwellings and Zangwill is a four-storey block of ten dwellings. Crone Court and Zangwill are separated from Woodhouse Urban Park by Denmark Road. Both blocks have historically had a Lack of clarity about what is the front or back of the buildings property, and between public and private space, although Zangwill more recently has made this more apparent by incorporating a 6-foot close boarded fence along Rupert Road. The e Entrances to both are set in a public realm principally dominated by car parking with a limited amount of green space, at one of its entrances. Both blocks face on to a communal private/semi-public space.</p> <p>PTAL Rating 4/ to 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. • The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station mean a car free development should be the starting point. 	BT2) and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Justification</p> <ul style="list-style-type: none"> Current buildings The accommodation is <u>are</u> not viable to maintain or bring up to modern day standards. Redevelopment provides an opportunity to create a stronger frontage onto Woodhouse Urban Park and better integrate the site with adjacent streets including Canterbury Road where there is currently no defined frontage and better integrate the site into the wider development. whilst continuing the step change in Improvement in the quality of mixed use and mixed tenure residential accommodation. 	
MM64	5.6 South East Place	BESA7, page 204-205	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 40 56-10 Years 22 110+ Years</p> <p>Address 1-167 Dickens House, Malvern Road, NW6 5YP</p> <p>PTAL Rating 3 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. A terrace of locally listed buildings are located to the west of the site along Malvern Road. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> Dickens will be a perimeter block building ranging from 4-7 storeys. It will provide frontage to Malvern Road and the extension of Percy Road. <u>The development should positively address the setting of the terrace of locally listed buildings located to the west of the site along Malvern Road.</u> Taller elements up to 7 storeys to be integrated at key prominent corners to indicate the new neighbourhood entrances. The Dickens development will be dDesigned and orientat<u>ioned</u>to avoid overlooking issues with the neighbouring school. The scale and form of the development should <u>seek to</u> prevent north facing single aspect units. It should maximise sunlight and daylight to the adjacent school through the lower storey heights being on the south western side of the perimeter block. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. This site is very sensitive to foul water flows. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. Thames Water will need to be engaged at the earliest opportunity to agree <u>a</u> drainage strategy and a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Justification</p> <ul style="list-style-type: none"> The blocks s are is of poor construction that it is not viable nor desirable to refurbish, The blocks sit within a poor quality landscape, of disparate open space and garages which can be replaced by Capacity for more dwellings along sound urban design principles that create a better environment and provide better connectivity through introduction of new streets. 	
MM65	5.6 South East Place	BESAS8, page 206-207	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity 20296 net (250 gross)</p> <p>Timeframe for Delivery 01-5 Years 20296 56-10 Years 110+ Years</p> <p>Address 1-124 Hereford House, Carlton Vale, NW6 5QH and 1-32 Exeter Court, Cambridge Road, NW6 5AJ Carlton Vale</p> <p>PTAL Rating 6a (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London Plan policies and incorporate essential infrastructure needs and incorporate SFRA Level 2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • South Kilburn Conservation Area is to the north of the site. A locally listed building 71 Cambridge Road is located adjacent the site to the north east. • The site benefits from a High public transport accessibility level, being in walking distance of Kilburn Park and Kilburn High Road Stations <u>mean a car free development should be the starting point.</u> • <u>Development must be consistent with the recommendations of the Brent Strategic Flood Risk Assessment Level 2.</u> <p>Design Principles</p> <ul style="list-style-type: none"> • The creation of tThe new Granville Park, on the west of the site, will improve access to open space in the area and also create an overlooked public route from Carlton Vale to Granville Road. It will complement South Kilburn open space by providing a more intimate space, with a high quality hard paved area to encourage use in all seasons. • To the east residential perimeter blocks arranged around a courtyard should range in height from 4 to 12 storeys and positively address all external frontages providing overlooking and appropriate set-backs for residents' privacy and sufficient planting space. • <u>South Kilburn Conservation Area is to the north of the site. A locally listed building 71 Cambridge Road is located adjacent the site to the north east. The scale height, massing, design and detailing of the proposed buildings should preserve and enhance the settings of adjoining heritage assets.</u> Lower storey elements are to be located to the north towards the conservation area <u>these heritage assets</u>, with taller elements fronting Carlton Vale. A variety of heights along the southern, eastern and western frontages will both add interest and provide the opportunity for sunlight/<u>daylight</u> to penetrate into the internal space and dwellings. The scale height, massing, design and detailing of the proposed buildings should be such that they do not undermine the need to preserve and enhance the settings of adjoining heritage assets. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Open space to be relocated from the north of Granville Road Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. The site is only served by foul sewers. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. 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. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way. <p>Justification</p> <ul style="list-style-type: none"> The existing buildings are of poor design and construction, creating poor housing conditions and potential for anti-social behaviour in communal spaces, which cannot be remedied cost efficiently through refurbishment. The opportunity exists to provide Provision of better housing along sound urban design principles, creating a human scale environment that integrates with the surrounding area and is more sympathetic in scale to the conservation area. It will be at a dDensity that reflects the PTAL rating and reinforces the street hierarchy. and setting of Carlton Vale in particular, subject to the council being able to ensure Granville Road is reopened between this site and the Carlton and Granville Centres which subsequently will result in the existing Replacement of the Granville Open Space which is being developed for housing, (see site 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			allocation BSESA11) with a T this site will incorporate its replacement open space. This will provide a better quality open space with greater opportunity for better sunlight penetration, overlooking/sense of security and more due to its prominent position, which will increase usage.	
MM66	5.6 South East Place	BSESA9, page 208-209	<p>Timeframe for Delivery 01-5 Years 0 56-10 Years 0 110+ Years 0</p> <p>PTAL Rating 5 increasing to 6a in (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station mean a car free development should be the starting point. <p>Justification</p> <ul style="list-style-type: none"> The existing school will be transferred to the Wordsworth House/Masefield House site which also incorporates some of the existing South Kilburn Open Space. There will be no net loss of open space. The use of open space for this site will be of significant benefit. It will create a more regular shaped open space that can be put to better use and feel more secure. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> It will raise raise the profile of the space in the public's consciousness and its impact on townscape by opening up views into the park when arriving from Queen's Park/Kilburn Lane. 	
MM67	5.6 South East Place	BESA10, page 210-211	<p>Timeframe for Delivery 01-5 Years 148 56-10 Years 110+ 10+ Years</p> <p>Address 1-8 Neville House, Denmark Road <u>NW6 5BT</u>, and 1-64 Winterleys, <u>Albert Road, NW6 5DR</u></p> <p>PTAL Rating 4 to 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive The site benefits from Good public transport accessibility levels, being in walking distance of Queen's Park Station <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> Development should take influence from the Albert Road and Bond developments and integrate into the new layout. An active building frontage should be provided along Woodhouse Urban Park and Denmark Road. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BT2) and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Heights should range from 2 to 9 storeys, with taller elements fronting Woodhouse Urban Park. Building are to be arranged around a courtyard with breaks in height to allow maximise daylight and sunlight into the heart of the buildings. <p>Justification</p> <ul style="list-style-type: none"> The blocks are in a poor state of repair and represent a poor overall use of the space. There is an opportunity to provide more dwellings of a better design which are more integrated with the surrounding environment. in a better environment which better addresses streets and integrates with the new development to the north and east. It will also create a stronger relationship with Woodhouse Urban Park. In addition, t The The creation of a courtyard will give residents access to more useable private space. This will contribute to the continued step change Improvement in the quality of mixed use and mixed tenure residential accommodation and public space. 	
MM68	5.6 South East Place	BESA11, page 212-213	<p>Indicative Capacity 4020 Timeframe for Delivery 01-5 Years 020 56-10 Years 10 110+ Years 0</p> <p>Description of Existing Site aA small public open space essentially of seating areas and forming within a typically functional municipal landscape created in the early phases of the South Kilburn estate's regeneration. The site is currently a public connection between the two parts of Granville Road, which was severed by extension of</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan policies Plan (Policy BSUI2 and Policy BT2), incorporate essential infrastructure

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>the grounds of the Iranian school over public highway. It also incorporates The space is poorly overlooked with no adjacent frontage development and backs on to rear boundary fences of villas on Princess Road, increasing their risk of being subject to crime.</p> <p>PTAL Rating 5 <u>(current and 2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area <u>and an Air Quality Management Area where major developments are required to be Air Quality Positive.</u> • South Kilburn Conservation Area adjoins the site on its northern boundary. • The site comprises open space. Compensatory open space of equivalent quality quantity and higher quality will be provided as part of the Hereford <u>House and Exeter Court (BSESA8)</u> site development. • As with the majority of Brent the site is located within an Air Quality Management Area. • Major developments within Growth Areas are required to be Air Quality Positive. • The site benefits from a hHigh public transport accessibility level, being in walking distance of Kilburn Park and Kilburn High Road Stations. <u>mean a car free development should be the starting point.</u> A bus stop is adjacent to the site on Carlton Vale. <p>Design Principles</p> <ul style="list-style-type: none"> • To essentially r<u>Replication of</u> the character of the adjacent buildings. by • creating buildings of a m<u>Modest</u> height (typically 4 storeys with opportunities to vary by one storey as has occurred on the adjacent sites). 	<p>needs and to account for fact that the re-purchase of the original street is now considered unlikely to be possible.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The buildings will front face to the street and be set back from the pavement edge in a similar manner to that of 21-53 Granville Road, to give This will provide sufficient room for a defensible space, to ensure residents' privacy whilst for incorporation of s sufficient landscaping to enhance the street setting. <p>Justification</p> <ul style="list-style-type: none"> Public consultation identified that this space is not widely used or known. due to its limited visibility and lack of attractions is essentially unknown to the majority of the surrounding population. †The redevelopment of the site is not dependent upon the reopening of Granville Road currently incorporated into the Iranian school, although this would be preferable. might improve its accessibility and raise public awareness there is no certainty that its inherent potential weakness; a lack of natural surveillance will be satisfactorily addressed. <p>As such it is considered that there is merit in transferring the</p> <ul style="list-style-type: none"> Equivalent open space will be provided within to the Hereford House and Exeter House development, which <p>This site would then be redeveloped for residential purposes. It is recognised that this is likely to reduce the amount of dwellings delivered in South Kilburn; the Hereford/Exeter site which would incorporate the new open space can be developed at a higher density. Nevertheless, the reintroduction of the historic building line, likely reduction in the potential for crime and anti-social behaviour within the public realm and greater likely use of the alternative open space merit this approach.</p>	
MM69	5.6 South East Place	BESA12, page 214-215	<p>Indicative Capacity Unknown -40 net Timeframe for Delivery 01-5 Years 56-10 Years -40</p>	To increase brevity and make consistent approach across the housing

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>110+ Years</p> <p>Address 1-29 Wordsworth House NW6 5YT, and 1-11 Masefield House, NW6 5YU, both Stafford Road</p> <p>PTAL Rating 3to 4 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and As with the majority of Brent the site is located within an Air Quality Management Area where major developments within Growth Areas are required to be Air Quality Positive. Part of the site is open space. Reprovision of open space of the same quantity and improved quality will need to be reprovided as part of the reconfiguration of the Kilburn Park Junior School Site. Retention of There are a number of mature trees on the site which should be retained. <u>Reprovision of the existing Multi-use Games Area (MUGA) which is present at the Kilburn Park Junior School site, together with a community use agreement covering this, and other spaces such as halls, within the school.</u> <p>Design Principles</p> <ul style="list-style-type: none"> TheThree storey school building (with potentially ly with for additional modest height increases to accommodate residential development, should this be provided to meet staff needs) with clearly dDefined and animated frontages 	trajectory, Local Plan and London Plan policies, reflect the need to replace existing community facility and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • will provide a perimeter block on Stafford Road and Percy Road, plus public realm to the south between it. • To the west the school's grounds will extend to include some of the current South Kilburn open space as a dual-purpose This amenity and learning space. • will retain the Retention of maturing trees and provide a more clearly defined boundary to the remaining open space. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • New 3FE school building • When further information on the scale of development is available Thames Water will need to be engaged to establish impact on water supply network and water treatment infrastructure. <u>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.</u> There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way. 	
MM70	5.6 South East Place	BESA13, page 216-217	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery</p> <p>01-5 Years</p> <p>56-10 Years 35-29</p> <p>110+ Years</p> <p>PTAL Rating</p> <p>4 <u>(current and 2031 estimate)</u></p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan policies Plan (Policy BSUI2 and Policy BT2) and incorporate

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area <u>and an Air Quality Management Area where major developments are required to be Air Quality Positive.</u> Part of the west portion of the site which is currently serving as a car park has flood zone 3a (surface water) concerns, as does the adjacent Chippenham Gardens road, in particular its junction with Malvern Road. This site is only served by foul sewers and has limited access to the Ranelagh Trunk Sewer (in Kilburn Park Road). SuDS should be utilised and the surface water disposal hierarchy will need to be clearly demonstrated to determine the most appropriate discharge location. As with the majority of Brent the site is located within an Air Quality Management Area. Major developments within Growth Areas are required to be Air Quality Positive. The site benefits from Good public transport <u>accessibility levels, being in walking distance of</u> links with a PTAL rating of 4, being within a 12-minute walk of 3 bus stops and Queens Park, Kilburn Park and Westbourne Park Underground Stations <u>mean a car free development should be the starting point.</u> <p>Risks</p> <p>Relocation of current residents and their opposing. <u>Need to decant existing residents.</u></p> <p>Design Principles</p> <ul style="list-style-type: none"> The frontage is to activate the street and interact with the new Chippenham Gardens development. The new building should be 5 to 7 storeys and complement the heights of new developments along Malvern and Kilburn Park Road. 	essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The development should extend to the plot boundaries, to provide for the incorporation of a useable amenity space to the rear for residents. The layout will have to positively address the massing concerns and interaction with Malvern Place; overcoming the potential for a blank wall, and undefined space to be a product of the regenerated site. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Green space. Cycle parking. Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. 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. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way. 	
MM71	5.6 South East Place	BSESA14, page 218-219	<p>Indicative Capacity 213 gross (66 net dwellings taking account of demolition)</p> <p>Timeframe for Delivery 01-5 Years -147 56-10 Years 213 110+ Years</p> <p>Address 1-74 William Dunbar House, Albert Road, NW6 5DE, and 1-74 William Saville House, Denmark Road, NW6 5DGE</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan Plan (Policy BSUI2 and Policy BT2) and London Plan policies and incorporate

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>PTAL Rating 5 <u>(current and 2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area <u>and an Air Quality Management Area where major developments are required to be Air Quality Positive.</u> West Kilburn Baptist Church to the south of the site is a Local Heritage Asset. The perimeter of the site is lined with numerous trees which should be retained. As with the majority of Brent the site is located within an Air Quality Management Area. Major developments within Growth Areas are required to be Air Quality Positive. A small section of the site to the north east has a history of industrial usage and will therefore require testing for contamination, with potential remediation works being carried out. The site benefits from a Good public transport <u>accessibility levels</u> links with a PTAL rating of 5, being with a 5-minute walk of 2 bus stops and <u>in walking distance of</u> Queen's Park train station. <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> Development is to create a strong active frontage along Carlton Vale, comprising ground floor commercial uses. Buildings should generally range in height from 5 to 9 storeys. As a gateway to South Kilburn there is also an opportunity for a taller element of up to 17 storeys to create a sense of arrival. 	essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The demolition of William Saville House offers the potential of for a pedestrian link to Carlton Vale which should to be provided and development provided along this active frontage to create overlooking and improve safety environment. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Cycle parking. Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development, and upgrades to the wastewater network are likely to be required. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward. The site is only served by foul sewers. 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. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way. <p>Justification</p> <ul style="list-style-type: none"> The site is in a prominent gateway location and the current development does not capitalise on this. There is an opportunity for development to create a sense of arrival and present a stronger active frontage along Carlton Vale, brought to life with commercial units at ground floor to strengthen connections between Queen's Park station/Salusbury Road and the Peel development which will provide a key health facility destination. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> In addition, opening up the Denmark Road to pedestrian movement will allow improved connections from the South Kilburn estate into the wider area. 	
MM72	5.6 South East Place	BESA15, page 220-221	<p>Timeframe for Delivery 0<u>1</u>-5 Years 5<u>6</u>-10 Years 1<u>1</u>0+ Years</p> <p>PTAL Rating 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the South Kilburn Growth Area and an Air Quality Management Area where major developments are required to be Air Quality Positive. The community facility is meeting a local need and is to be retained as part of any redevelopment of the site. South Kilburn Conservation Area lies to the east of the site, but is not visible from the site due to Peel Precinct. The West Kilburn Baptist church which adjoins the site is a locally listed building. A detailed analysis will be required of the potential impact on the church and its context. The site has historically been in industrial use, therefore and a preliminary risk assessment for contamination will be required, and to identify if there is potential for contamination. If necessary, further investigations and remediation will be required. As with the majority of Brent the site is located within an Air Quality Management Area. Major developments within Growth Areas are required to be Air Quality Positive. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BSUI2 and Policy BT2) and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site benefits from Good public transport accessibility levels links with a PTAL rating of 4, being in walking distance of with a 5 minute walk of 2 bus stops and Queens Park train station <u>mean a car free development should be the starting point.</u> <p>Design Principles</p> <ul style="list-style-type: none"> To create an active ground floor use that extends the proposed frontage linking <u>with</u> Queen's Park and Peel. The opportunity exists to create A corner landmark building rising to 6 storeys, and possibly higher if incorporating the Baptist Church car park, depending if on relationship with <u>other nearby</u> adjacent existing or proposed buildings, produces a successful solution in terms of sympathetic relationship/overlooking/overshadowing of other buildings. The West Kilburn Baptist Church is to be retained and its setting enhanced. <p>Justification</p> <ul style="list-style-type: none"> The premises are a <u>Currently</u> poor piece of townscape at a very low density, <u>presenting blank walls to adjoining public realm.</u> given the <u>Good</u> PTAL rate and <u>higher density emerging context.</u> potential heights of adjacent developments such as Craik House. The building currently presents essentially blank facades to the adjoining public realm. The Opportunity exists to develop at a much higher density, particularly if incorporating the adjacent West Kilburn Baptist Church car park, whilst maintaining and improving the existing community use. 	
MM73	5.6 South East Place	BESA16, page 222-223	<p>Timeframe for Delivery</p> <p>01-5 Years</p> <p>56-10 Years</p>	To increase brevity and make consistent approach across the housing

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>11¹⁰+ Years</p> <p>Address The Oxford Kilburn (OK) Club Neville Road, <u>NW6 5BT</u> and Christian Holt House, <u>45 Denmark Road, NW6 5BP</u></p> <p>PTAL Rating 4 to 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site is within the South Kilburn Growth Area <u>and an Air Quality Management Area where major developments are required to be Air Quality Positive.</u> • The community facility is meeting a local need and is to be retained, as part of any redevelopment of the site. • There are no flood zones within the site, but potential for surface water flooding on the adjacent Neville Road. • There are mature trees on the western boundary of the site which will need to be retained and protected during construction works. • South Kilburn Conservation Area lies to the east of the site, but is not visible from the site due to Peel Precinct. • As with the majority of Brent the site is located within an Air Quality Management Area. Major developments within Growth Areas are required to be Air Quality Positive. • The site benefits from Good public transport <u>accessibility levels, being in walking distance of</u> links with a PTAL rating of 4, being within a 5 minute walk of 2 bus stops and Queens Park train station <u>mean a car free development should be the starting point.</u> <p>Design Principles</p>	trajectory, Local Plan (Policy BT2), London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • A perimeter block on three sides that provides the community use on the ground/lower floors and has active frontages and a positive relationship with the adjacent highways of Denmark Road, Canterbury Road and Neville Road. • Consideration should be given to limiting impacts on the development capacity of the adjacent Crone and Zangwill sites, as set out in this SPD, with a view to not undermining its identified development capacity. • The heights of proposed buildings should be up to 6 storeys to reflect the scale of the street, and in-particular the other side of Neville Road as proposed in the Peel development. • Ideally the Dylan Kirby memorial wall should be kept in situ, or appropriately incorporated into the new building. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • Replacement of the community facilities of sufficient size and quality either on or off-site, or in very close vicinity, to be able to serve South Kilburn's needs. • <u>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.</u> <p>Justification</p> <ul style="list-style-type: none"> • The Trust has approached the council regarding the potential Regeneration of the site <u>whilst providing</u> to better support its activities in contemporary premises fit for sustaining the charity's <u>activities and</u> long term purpose, and improving outcomes for young people. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Ideally the community use will remain on site, however with re-provision occurring in new buildings. Nevertheless, in the context of planning policy, off-site re-provision may be possible, as long as it can be justified to show providing there would be nil detriment in terms of meeting any local community needs compared to the existing premises. Although in the context of South Kilburn, some of the buildings are older than their surroundings, they are not considered to be of such historic or architectural significance that their they should necessarily be retained if high quality replacements with higher quality buildings would be unacceptable. are proposed. The Dylan Kirby memorial is clearly well regarded by the local community and its sympathetic incorporation into any regeneration needs to be considered. 	
MM74	5.6 South East Place	BESA17, page 224-225	<p>Timeframe for Delivery 01-5 Years 56-10 Years 200 110+ Years 180</p> <p>PTAL Rating 3 to 4 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The north of the site backs onto the Proximity to railway, and includes the railway trackside which is designated as both a wildlife corridor and a Grade 1 Site of Importance for Nature Conservation (Dudding Hill Loop between Cricklewood and Harlesden B106C). Care should therefore be taken so as not to disturb this valued ecosystem. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BT2), London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The car parks are verged with vegetation of varying quality, including bushes and trees. There are also 3 trees on the path along Cricklewood Broadway <u>should not be adversely affected by the development.</u> As with the majority of Brent the site is located within an Air Quality Management Area <u>where</u> major developments within Growth Areas are required to be Air Quality Positive <u>neutral.</u> Significant areas of car parking and parts of Longley Way are within Flood Zone 3a due to surface water flooding. This is associated with the large areas of impermeable paving and lack of vegetation. It will need to be demonstrated through a Flood Risk Assessment how surface water flooding will be mitigated and development <u>not increase flood risk</u> will be made flood resilient. The site has a History of industrial use and will therefore requires testing for contamination, with any potential remediation works being carried out. <p>Design Principles</p> <ul style="list-style-type: none"> The development should <u>relate</u> be sympathetic to the general character <u>and scale</u> of the high quality residential area to the south along Temple Road and on the opposite side of Edgware Road. Along Edgware Road, in recognition of the variation in heights along its length from Kilburn in the south up to this point, and its identification as an intensification corridor towards the north it is considered that heights of up to 5 storeys will be appropriate. Along Temple Road and the west of the site that adjoins two-storey dwellings, development should successfully relate to the scale of these. Due to the proximity to the wildlife corridor and SINC and <u>to help address</u> issue with surface water flooding, <u>and poor air quality along the A5</u> the development should include significant green infrastructure, <u>particularly along its edges</u>, incorporating nature and enhancing it in the process. The 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>introduction of greenspace will the site and in the process increase ground permeability, reducing any flooding concerns.</p> <ul style="list-style-type: none"> Given the poor air quality along the A5 and surface water flooding, it will be important for development to seek to increase soft landscaping and reinforce tree planting along the highway. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Potentially parking. Green infrastructure. Thames Water has indicated the water network capacity in this area may be unable to support the demand anticipated from this development. Thames Water will need to be engaged at the earliest opportunity to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. There are public sewers crossing or close to the site. The risk of damage during construction must be minimised, and it must be ensured that development doesn't inhibit access for maintenance or the services in any other way. <p>Justification</p> <ul style="list-style-type: none"> This is a large site which is currently being used for very low intensity purposes, and would be much better utilised <u>Opportunity to optimise the density of the site</u> for the development of homes. Currently having low aesthetic and ecological value, the site could be developed to incorporate nature, creating a vibrant and relaxing place for people to live. Due to the size of the site it should be feasible to include high density elements increasing the site's utility. 	
MM75	5.6 South East Place	BESA18, page 226-227	BESA18 245–289 CRICKLEWOOD BROADWAY <u>AND HASSOP ROAD</u>	To increase brevity and make consistent

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 56-10 Years 40 110+ Years 40</p> <p>Address 2435 289 Cricklewood Broadway and Hassop Road, London, NW2 6NX Area 0.695ha</p> <p>PTAL Rating 5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • The site forms part of Cricklewood Town Centre's secondary shopping frontage. Developments should therefore be in keeping with the local character and retain ground floor commercial frontages. • This site is adjacent the Cricklewood Railway Terrace Conservation Area which lies on the opposite side of the Edgware Road in Barnet. • As the site has a high PTAL and a Controlled Parking Zone is in place car free development will be required. • As with the majority of Brent the site is located Within an Air Quality Management Area where where major developments within Growth Areas are required to be Air Quality Positive neutral. • The majority of the site has historical industrial usage and will therefore require testing for contamination, with any potential remediation works being carried out. 	<p>approach across the housing trajectory, Local Plan (Policy BE3 and Policy BT2) and London Plan policies, incorporate essential infrastructure needs and industrial re-provision.</p>

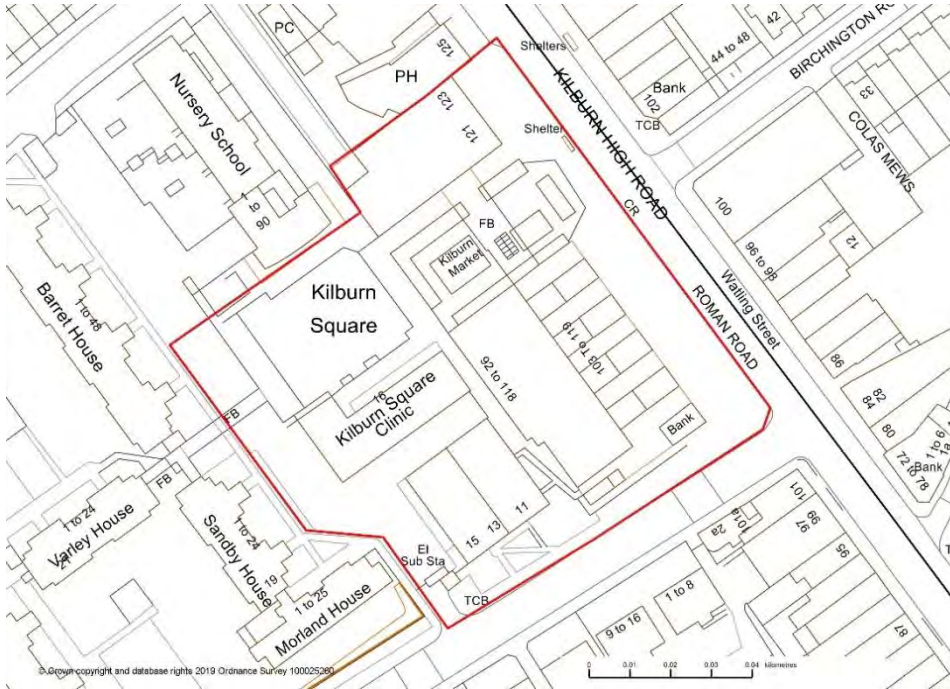
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> There are two trees along Cricklewood Broadway, adjacent to the site, which should be retained and planting reinforced. Hassop Road includes industrial businesses which are negatively impacting on the amenity of neighbouring residents. Policy BP6(q) promotes the conversion of premises on Hassop Road to employment industrial uses which improve amenity for neighbouring residential units. Draft London Plan policy E4 identifies Brent as a borough which is to provide additional industrial capacity. As such, <u>As a Local Employment Site, the maximum viable amount of an increase in employment industrial floorspace will be sought required as part of any redevelopment, in accordance with policy BE3.</u> With a PTAL rating of 5 the site is well provided for with 2 bus stops, serviced by numerous buses, and Cricklewood train station within a 10 minute walk of the site. <p>Design Principles</p> <ul style="list-style-type: none"> Constituting part of the Cricklewood Town Centre secondary frontage, development should retain a ground floor commercial frontage. <u>Cricklewood Railway Terrace Conservation Area is opposite on Edgware Road in Barnet.</u> Development should respond to the height and proportions of adjoining 3-storey development and be of a quality which complements local character. Given the poor air quality along the A5 and surface water flooding it will be important development seeks to increase soft landscaping and reinforce tree planting along the highway. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> <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</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u></p> <p>Justification</p> <ul style="list-style-type: none"> • The Current buildings currently occupying the site is are of little aesthetic value, and is being composed primarily of materials such as concrete and corrugated iron. This is not in keeping with local character and, if redeveloped, could become more harmonious with this character. • The site is in an area of high PTAL and currently underutilised as low density commercial uses. • A mixed use development including housing would help support the vitality of the town centre. • The public domain in front of the site is quite spacious and would benefit from the introduction of more green infrastructure. • Draft London Plan Policy E7 requires development proposals on all categories of industrial land to intensify businesses industrial uses in Use Classes E(g) B1c, B2 and B8. As such an increase in employment industrial floorspace will be sought. <u>There is a need for additional industrial space in Brent, a redevelopment of old industrial premises allows the opportunity to re-provide better quality space.</u> • Existing vehicle repair garages are negatively impacting on the amenity of adjoining residents. Replacement with lighter industrial uses would help reduce amenity impacts. 	
MM76	5.6 South East Place	BESA19, page 228-229	<p>Timeframe for Delivery</p> <p>01-5 Years 56-10 Years 110+ Years</p> <p>Description of Existing Site</p>	To increase brevity, clarity of existing site, make consistent approach across the housing

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Part of the building is currently used as a church. The site is adjoined by car parking. <u>Gaumont State cinema is a Grade II* listed Art Deco movie palace designed by George Coles. Opened in 1937, it had the greatest audience capacity of any English cinema (4,004 seats). It also had a fully equipped stage for theatre use including workshops and dressing rooms. Its 37 metre tower is inspired by the Empire State Building. The interior is in an opulent Classical style and includes the original Wurlitser organ.</u></p> <p>PTAL Rating 4-6 (2015/2031) <u>4 to 6 (current and 2031 estimate)</u></p> <p>Planning Considerations The Gaumont State cinema is a Grade II* listed Art Deco movie palace. The building opened in 1937 and was originally designed as a cinema but with a fully equipped stage for theatre use including workshops and dressing rooms. It has a long history as a cultural and community venue. As well as a cinema, it served as a popular music venue for a number of years. Its 37 metre tower is inspired by the Empire State Building. The interior is in an opulent Classical style and includes the original Wurlitser organ. One of the largest and most impressive movie palaces ever constructed in Britain, the Gaumont State, had the greatest audience capacity of any English cinema (4,004 seats). On the corner on Willesden Lane was an imposing second entrance with restaurant and dance floor above. Both externally and internally, George Coles (the architect) brilliantly orchestrated the decoration and space.</p> <ul style="list-style-type: none"> • <u>The size and quality of the building has significant potential as a cultural or leisure destination to support Kilburn's role as a major town centre and in London's night time economy and as such its more intensive use to support these objectives will be supported.</u> • Given its <u>Grade II* Listed</u> significance early consultation is advised with consultees such as Historic England, C20 Society, and Theatres Trust. 	<p>trajectory, Local Plan and London Plan policies, ensure viability of the cinema building and provide clarity on early engagement and associated evidence to support applications.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>Applications for changes of use and substantial alterations to the building will need to be supported and justified within a Heritage Statement.</u></p> <ul style="list-style-type: none"> • <u>Continued access to the</u> adjacent carpark <u>area</u> and workshop at the rear which, when back in use, would be <u>are considered</u> essential to the long term viability of <u>servicing</u> the building <u>for large scale productions and should not be compromised.</u> Any proposals for the building and the car park must be considered with this in mind. • The site is adjacent Brondesbury Mews which has a terrace of Locally Listed Buildings. • The site is also adjacent an area which has been identified in the Heritage and Place-making Strategy for designation as a possible conservation area extension to the Kilburn Conservation Area. • The building is located within Kilburn Major Town Centre. • The area benefits from High public transport accessibility levels <u>within walking distance of</u> Kilburn High Road station and Brondesbury Park are the closest tube and overground stations. The area is also served by various bus routes from 6 bus stops within the vicinity. <u>Car free development is the starting point.</u> • The site is Within an Air Quality Management Area, with the adjoining A5 being a major source of both air and noise pollution. As a minimum development is to be Air Quality Neutral. <p>Design Principles</p> <ul style="list-style-type: none"> • <u>As well as being a building of significance it is adjacent to a terrace of locally listed buildings in Brondesbury Mews and a possible conservation area extension to the Kilburn Conservation Area (see Heritage and Placemaking Strategy). As such, retention, preservation and enhancement of</u> Any proposals will be required to retain and enhance the Gaumont State building and its setting <u>are required.</u> the building's 	

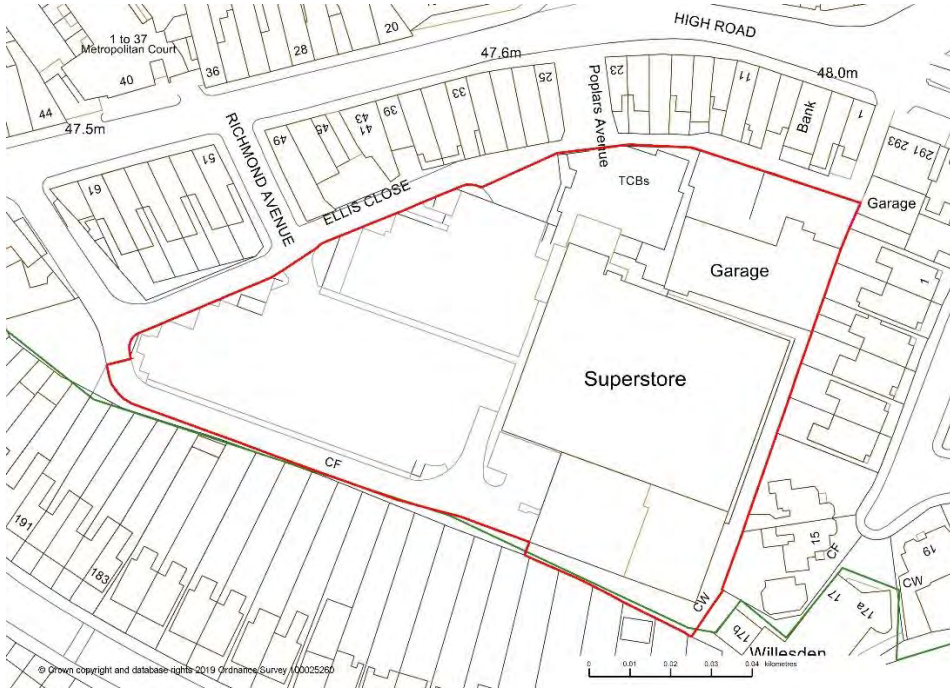
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>interior forms part of its significance and should be preserved. Applications for substantial alterations to the building will need to be supported and justified within a Heritage Statement and early engagement with the council is advised.</p> <ul style="list-style-type: none"> In addition, applications for change of use will need to be supported by a detailed analysis of the potential need and impact of the proposed use on the building and its context as well as any public benefit. Buildings such as this are required elements of a sustainable community, providing social, cultural, environmental and economic benefits as well as regeneration. They make a major contribution to the vitality of town centres and are a significant element of the Borough's cultural infrastructure. The immediately adjacent carpark forms part of the get in area and access to the workshop at the rear of the Gaumont which, when back in use, would be used on a regular basis and will be essential to the long term viability of the building. Any proposals for the building and the car park must be considered with this in mind. <p>Justification</p> <ul style="list-style-type: none"> The Gaumont Cinema is a Heritage asset of national importance which has played an important role in Kilburn's history, currently At present the building is an underutilised, public asset, as only parts of the building are used by a church group. Promoting full use of the building for cultural, leisure and community uses will help safeguard its future, and allow the wider community to access the facility. Gaumont State is located within Kilburn Town Centre, and increasing its use for cultural, leisure and community activities will contribute to the vibrancy 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			of Kilburn Town Centre and its night time offer <u>and help safeguard its future.</u>	
MM77	5.6 South East Place	BESA20, page 230-231	<p><i>Insert Site Plan:</i></p>  <p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery 01-5 Years 56-10 Years 50 110+ Years 50</p>	<p>Map missed off by publishers.</p> <p>To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE8) and London Plan policies and incorporate essential infrastructure needs, reflects CCG's confirmation of no longer a health centre need, however the site can serve other social infrastructure needs.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>PTAL Rating 6a (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • <u>As</u> The market and units fronting the High Road form part of the primary frontage of Kilburn Major Town Centre, As such, development should maintain an active frontage along the High Road and include retail floorspace. • The market adds to the vibrancy of the centre and will <u>is to</u> be required to be retained and improved <u>in accordance with the requirements of policy BE8 – Markets and Car Boot Sales.</u> • To the south the site is bounded by Brondesbury Road, which forms part of Kilburn Conservation Area. The road comprises 2 to 3 storey brick villas built pre 1865. • Number 10 Brondesbury Road is locally listed. • The north-eastern corner of the site is located within a Site of Archaeological Importance <u>which will require appropriate assessment and if necessary mitigation strategies prior to development.</u> • The area benefits from High public transport accessibility levels. Kilburn High Road station (Overground) is 200m south east and Kilburn Park stations are close (Bakerloo) 400m south of the site. The area is also served by various bus routes from 6 bus stops within the vicinity, <u>car free development should be the starting point.</u> • <u>Improving accessibility and connectivity between</u> The main access point onto the site is from Kilburn High Road <u>and Kilburn Square via potentially reconfigured market area, and consideration of</u> , which forms part of the A5, a busy route into Central London. There is also access to the residential areas through Brondesbury Road. • Although much of the site is hard landscaped, Kilburn Square is soft landscaped and provides amenity space for residents. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> There are a number of mature trees within the square along the High Road, Brondesbury Road to the south of the site is lined with trees. A number of a Areas of hard standing to the rear of the site are within flood zone 3a due to potential for surface water flooding. <u>A Flood Risk Assessment will be required.</u> The site is Within an Air Quality Management Area, with the adjoining A5 being a major source of both air and noise pollution. As a minimum development is to be Air Quality Neutral. A number of night time uses are concentrated within Kilburn High Road which can generate noise. The 'agent of change' principle will apply, <u>with regards to High Road night-time uses.</u> This means Development which introduces sensitive uses to an area (for example housing) will be responsible for managing and mitigating the impact from existing uses. <p>Design Principles</p> <ul style="list-style-type: none"> <u>Comprehensive approach by the two principal landowners for Kilburn Square to be enhanced and function as a single new public square space, suitable for residents' amenity, events, and a modern market facility, as will create a focal point both for the site adjacent residential estate and Kilburn High Road. The layout and design of the square should enable its use for events.</u> <u>Kilburn High Road frontage provides an opportunity for a comprehensive redevelopment to use land more efficiently providing space that meets modern retailing requirements and reinstate a streetscape that is more consistent with the urban design principles applied in the rest of the town centre, with active frontages should be located along Kilburn High Road and the square, with at ground floor and mixed-use development above.</u> <u>Adjacent is Brondesbury Road, part of Kilburn Conservation Area comprising 2 to 3 storey brick villas built pre-1865 and number 10 is</u> 	

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			<p>locally listed. Development fronting the High Road should integrate well with the surrounding context and consider character, setting, and the form and scale of neighbouring buildings.</p> <ul style="list-style-type: none"> Given surface water flooding and poor air quality it will be important development seeks to increase soft landscaping. There are a number of Mature trees within the square, and along the High Road, and along Brondesbury Road to the south of the site is lined with trees should where possible be retained and reinforced. Tree planting should be protected and reinforced, particularly along the A5. Development, through its layout and materials, should mitigate impacts from the A5 and nearby night time uses. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Re-provision of the market and creation of a new public square. <p><u>Replacement of health centre with an alternative use that meets community needs.</u></p> <p>Justification</p> <ul style="list-style-type: none"> The market and buildings are now dated. The layout does not make the most efficient use of the land and has poor permeability connectivity. At present Kilburn High Road Lacks of a focal point and although this site contains a wide paved area, its linear form and the fact it is bounded by the busy A5 mean that it is currently not a desirable location to spend time or hold events. Kilburn has the highest comparison goods turnover of any centre in the Borough, and has increased its market share over the past decade. The Brent Retail & Leisure Needs Study identifies Kilburn as having the highest comparison goods turnover of any centre in the Borough. to continue this positive momentum, and additional comparison retail floorspace should be directed to this town centre. 	

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			<ul style="list-style-type: none"> This site is a key Opportunity to meet the need for additional comparison retail floorspace to meet needs, in Kilburn Town Centre, and create a new focal point in the form of a modern public square and market facility, and - As a town centre location with good public transport accessibility, both the NPPF and London Plan policy promote intensification for mixed-use development including residential. There is scope for this to be achieved through an improved layout which makes more efficient use of the land. 	
MM78	5.6 South East Place	BESA21, page 232	<p><i>Insert Site Plan:</i></p>  <p><i>Amend parts of policy to read:</i></p>	<p>Map missed off by publishers.</p> <p>To increase brevity, reflect existing use, and make consistent approach across the housing trajectory, Local Plan (Policy BT2) and London Plan policies and incorporate essential infrastructure needs.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Existing Use Supermarket, car parking and an employment retail use.</p> <p>Allocated Use Mixed-use including housing and retail and employment uses.</p> <p>Timeframe for Delivery 01-5 Years 56-10 Years 25 110+ Years 25</p> <p>Description of Existing Site The site consists of a large single storey Sainsbury's supermarket and large expanse of car parking. In the north east corner of the site is a vehicle repair garage fireplace and antique architectural pieces showroom and associated car park. To the north the site is bounded by rows of 3.5 storey terraced housing with ground floor commercial uses. To the south and east, the site is bounded by residential gardens. The site is accessible from Willesden High Road via Ellis Close, Richmond Avenue and Poplars Avenue. Poplars Avenue is pedestrianised and is not accessible for vehicles.</p> <p>PTAL Rating 4 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is Within Willesden District Town Centre Secondary Shopping Frontage where replacement ground floor retail frontage will be sought and is adjacent to the Willesden Town Centre Conservation Area. The Sainsbury's currently represents part of Willesden Town Centres Secondary Shopping Frontage. The site lacks soft landscaping with the exception of four trees on site. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • As with the majority of Brent the site is located Within an Air Quality Management Area. As a minimum development is to be Air Quality Neutral. • The site has a history of industrial use. The north east corner of the plot is currently a vehicle repair garage and is therefore currently industrial. Testing for contamination should be undertaken along with any necessary remediation works. • An increase in employment floorspace will be required as part of any redevelopment. • The site contains an existing employment use. The draft London Plan requires Brent to provide additional employment floorspace capacity. As such an increase in employment floorspace will be sought. • Surrounding the supermarket are small areas designated as Flood Zone 3A due to the risk of surface water flooding. A Drainage and Flood Risk Assessment should identify measures to mitigate the potential flood risk. • With a PTAL of 4, the site is located within a 10-minute walk of and Willesden Green underground station <u>close by, car free development should be the starting point</u> and within a 5-minute walk of numerous bus services. • The Sainsbury's supermarket is an anchor store which contributes to the vitality of the town centre. It also helps to meet the borough need for convenience retail floorspace. A supermarket should therefore be retained as part of any proposal. <p>Justification</p> <ul style="list-style-type: none"> • The site is currently Underutilised with large <u>site in a residential area, with land used for</u> land dedicated to car parking. It is a large site in a residential area which could provide significant uplift in housing. • The site is Well serviced with a variety of stores along the High Road to the north and within close walking distance to transport facilities, making it a sustainable location for residential development. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site has low landscape value and would benefit from the introduction of greenery. This could also help mitigate surface water flood risk. <u>To protect the vitality and viability of the centre the supermarket should be retained.</u> The Sainsbury's supermarket is an anchor store which contributes to the vitality of the town centre. It also helps to meet the borough need for convenience retail floorspace. A supermarket should therefore be retained as part of any proposal. The site contains an existing employment use. The draft London Plan requires Brent to provide additional employment floorspace capacity. As such an increase in employment floorspace will be sought. <u>As a Local Employment Site, an increase in industrial floorspace will be sought as part of any redevelopment, in accordance with policy BE3 and London Plan policy E7.</u> Retention of employment floorspace in this location is consistent with the designation of Willesden as a creative quarter. This designation is informed by the Brent Workspace Study which identifies demand for workspace within Willesden. 	
MM79	5.6 South East Place	BSESA22, page 233	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Homes: 2042</p> <p>Comments: 17/0322 pending decision<u>minded to approve</u></p>	To reflect planning permission.
	5.6 South East Place	BSESA25, page 233	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Homes: 5070</p> <p>Comments: 17/5291<u>allowed at appeal</u></p>	To reflect planning permission.
	5.6 South East Place	BSESA28, page 233	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Mixed-use employment employment<u>industrial</u> and residential</p>	Consistency with the London Plan.
	5.6 South East Place	BSESA34, page 233	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Homes: Unknown20</p>	Estimate of capacity based on size and context.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
	5.6 South East Place	BSES35, page 233	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use: Residential and industrial employment in the B use class</p> <p>Comments: An uplift in employment The maximum viable provision of industrial floorspace will be required as part of any redevelopment.</p>	Consistency with the London Plan and Local Plan (Policy BE3).

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM80	5.7 South West Place	BP7, page 241	<p><i>Amend part b) of 'Character, Heritage and Design' to read:</i></p> <ul style="list-style-type: none"> a) Conserving and enhancing heritage assets including the Shree Sanatan Hindu Mandir on Ealing Road and the listed buildings and gardens of Barham Park. b) Respecting the low-rise character of the Sudbury and Wembley suburban residential areas, through focusing tall buildings (as defined in Policy BD2) in the Growth Areas of Wembley and Alperton. and elsewhere 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 Sudbury and Ealing Road town centres where buildings around 15-18 metres (5-6 storeys) could be appropriate. c) Creating a strong link between Wembley and Wembley Park town centres through public realm and junction improvements and new development to the east of Wembley Triangle, forming a continuous active frontage between the two centres. <p><i>Amend part d) and part e) and add new part d i) to 'Homes' to read:</i></p>	To provide clarity and provide consistency with Local Plan (Policy BD2 and Policy BE2) and Brent's Retail and Leisure Needs Study (evidence base). Set out housing delivery for the Place, provide housing target for defined neighbourhood areas in line with national policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>d) <u>Minimum of 10,600 additional homes in the period to 2041 through</u> Continuing residential-led mixed-use development within <u>the Alperton Growth Area (minimum 6,800 additional homes) and</u> the Wembley <u>Growth Area (that also crosses into the Central Place)</u> and Alperton Growth Areas, the Ealing Road and Sudbury town centres and intensification corridors.</p> <p><u>di) Delivering a minimum of 245 new homes in the Sudbury Town Neighbourhood Plan area in the period to 2041.</u></p> <p>e) Co-locating residential uses on areas of industrial and employment land within the Alperton Growth Area, taking advantage of areas well-served by public transport. Where alternative uses are co-located on industrial sites this will be as part of a comprehensive regeneration scheme which ensures a net loss of <u>a net increase in</u> industrial floorspace.</p> <p><i>Amend part g) of 'Town Centres' to read:</i></p> <p>f) Protecting and enhancing the retail function of Wembley town centre by clearly defining acceptable ground floor uses and maintaining a strong retail core on the high road.</p> <p>g) Providing a quality, diverse retail offer in Wembley town centre by providing for an additional 4,300sqm of A3 food and drink and A4 pubs/drinking establishments floorspace particularly in secondary shopping frontages to further support an evening economy and support the centre's potential change in status to a metropolitan centre in the London hierarchy. <u>2,100 sqm of additional comparison retail floorspace, and 4,300² sqm of convenience retail floorspace to 2028, in addition to that already existing and consented.</u></p>	

²Total combined floorspace to be delivered over the Central and South West Places.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>h) Promoting uses which enhance and diversify the cultural and commercial leisure offer, particularly those which provide 'family entertainment'.</p> <p><i>Amend part j) of 'Employment and Skills' to read:</i></p> <p>i) Encouraging the intensification of existing Strategic Industrial Locations and Locally Significant Industrial Sites around Alperton.</p> <p>j) Introducing mixed-use development to employment industrial sites around the junction of Ealing Road and Bridgewater Road.</p> <p>k) Increasing the supply of workspace in Wembley and Alperton including affordable workspace as set out in Policy BE3</p>	
MM81	5.7 South West Place	5.7.25, page 244	<p><i>Amend para 5.7.25 to read:</i></p> <p>The Sudbury <u>Town</u> Neighbourhood Plan supports development that results in the strengthening of Vale Farm as a regional centre for sports excellence. and that It identifies that improvements should not result in the loss of green space or open space, nor involve change of use and development other than for uses which support recreation, sporting and amenity use.</p>	To ensure the plan accurately reflects the content of the Sudbury Town Neighbourhood Plan 2015.
MM82	5.7 South West Place	BSWGA1, page 244	<p><i>Amend Policy to read:</i></p> <p>Alperton Growth Area's transformation as an extensive area of mixed use residential led regeneration principally focussed along the Grand Union canal will continue between Alperton and Stonebridge Park stations. The area will be a location for taller buildings at its Ealing Road and Northfields ends, with principally mid-rise in between.</p> <p>Investment in the canal and its setting on adjacent sites will enhance its role as an increasingly important environmental, recreational and movement corridor that draws the area together rather than acting as a divide.</p>	Provide consistency with London Plan, set out housing delivery in this strategic policy for the Place and update to better reflect the Open Space Sports and

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>In addition to over 6000 6,800 additional homes, Alperton will be encouraged to become an enterprise hub. This will principally be through new business and employment floorspace within those residential developments to provide a major boost to business and employment opportunities. This will deliver a new varied supply of neighbourhood friendly modern light industrial premises, studios and managed workspaces for local business, creative industries, and artists to reinvigorate the local economy.</p> <p>All developments will achieve the highest design standards and contribute positively better integrating the canal and its hinterland into Alperton into the surrounding area. Energy efficient design and renewable energy are encouraged. Development will be supported by associated additions to social infrastructure identified in the Infrastructure Delivery Plan, which will include:</p> <ul style="list-style-type: none"> • public squares and pocket parks A series of equipped play areas within new developments and open space • <u>Creation of informal recreation, Good quality public realm</u> along the canal and linking improved pedestrian and cycling routes; • <u>4 x 0.2ha Pocket park</u> • Improvements to the quality and accessibility of existing public open spaces; • <u>Opportunities for Food growing</u> • New nursery facilities; • New health facilities (as part of the Northfields Industrial Estate regeneration scheme) • A new 1 hectare public open space; 	Recreation Study (evidence base).

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Multi-use community centre; Roads/Junction and other public transport improvements; and Planting new trees. 	
MM83	5.7 South West Place	BSWSA1, page 248-249	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity 4200 1850</p> <p>Timeframe for Delivery 0-5 1-5 Years 650 1,059 5-10 6-10 Years 350 114 10+ 11+ Years 200 677</p> <p>PTAL Rating 3-5 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The sites are within Alpertown Growth Area, and have been partially allocated for development previously, albeit at much lower densities than currently proposed. Excluding the site of The Boat public house, these sites are all designated as Locally Significant Industrial Sites and therefore, in line with London Plan requirements, Policy BE2, there must be a minimum replacement of the existing amount of employment 	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>floorspace or 0.65 plot ratio, <u>or the existing industrial floorspace total,</u> 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.</p> <ul style="list-style-type: none"> • <u>Developments of non-industrial uses will not be permitted on LSIS until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.</u> • <u>If necessary and where it can be shown the existing landowners are effectively frustrating a comprehensive approach to an area's development that would frustrate the outcomes of the masterplan, the use of Compulsory Purchase will be considered.</u> • The site contains no recognised heritage assets, however Alperton Station is Locally Listed and any future development must take care to preserve and enhance its heritage value. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Given current and historic industrial use there is a risk of contamination and a Preliminary Risk Assessment will be required, and if necessary remediation. • Potential noise associated with the roads and adjacent employment uses will have to be addressed in design of development. • The railway line along the northern boundary of the sites is designated as a wildlife corridor. Development <u>and its associated</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>should take care to protect this area from any works which would <u>should not</u> compromise its biodiversity and retain. There are a number of mature trees across the sites which should be retained where possible.</p> <ul style="list-style-type: none"> • <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> • <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> • <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> • Parts of the site in the south are adjacent to the Grand Union canal and classified under Green Chain and Waterside Development Policy BGI1, where management, integration and enhancement of existing green and blue infrastructure are encouraged. The southern boundary along the Grand Union Canal will need an appropriate set back, landscaping and public access as part of a wider connection along the northern side of the canal. • The enhancement of the existing moorings along the southern stretch of the canal should be considered in association with the Canals and Rivers Trust. In addition, developers will be encouraged to explore the use of canal water as a low carbon energy source to heat 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</p> <ul style="list-style-type: none"> 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. <p>Design Principles</p> <ul style="list-style-type: none"> Given the height of the permitted Minavil House scheme and surrounding buildings including Peppermint Heights and residential development on the south side of the Grand Union Canal, these sites are deemed suitable to continue the cluster of tall buildings around Alperton Station in line with London Plan guidance. Tall buildings should be centred on the junction of Ealing Road and Bridgewater Road, stepping down towards the peripheries of the sites where in some cases it is likely that adjacent two storey residential properties will remain. Alperton Station should be well connected to or integrated into new development, providing a high quality public realm/pedestrian/cyclist environment. Potential noise associated with the roads and adjacent employment uses will have to be addressed in design of development. The sites to the east of Bridgewater Road must take account of the significant noise constraints created by the adjacent railway line. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The Minavil House and Alperton House site should come forward in line with principles set out as part of planning permission 16/2629 and 18/4199. Active frontages should be created where development is adjacent to a road and along the open spaces north of the canal. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Social, physical and sustainable infrastructure requirements to be fully drawn out in any future masterplan related to the residential capacity of the site. <u>The enhancement of the existing moorings along the southern stretch of the canal should be considered in association with the Canals and Rivers Trust. In addition, developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</u> <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Justification</p> <ul style="list-style-type: none"> These sites are generally low density Locally Significant Industrial Sites which have not maximised their development potential. This allocation would allow these underutilised sites to contribute to Brent's housing numbers within the designated Alpertown Growth Area, as well as increasing provision of employment industrial floorspace in line with London Plan requirements. The site's proximity to Alpertown Station make it an excellent location for residential use in addition to the existing industrial and commercial activity. Redevelopment of the sites bordered by the Grand Union Canal will allow for a continuation of the high quality canal side development planned to the east in further sites allocated for development. 	
MM84	5.7 South West Place	BSWSA2, page 251-252	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery</p> <p>0-5 <u>1-5</u> Years</p> <p>5-10 <u>6-10</u> Years</p> <p>10+ <u>11+</u> Years 200</p> <p>PTAL Rating</p> <p><u>4 (current and 2041 estimate)</u></p> <p>Planning Considerations</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies, incorporate essential infrastructure needs, safeguard public transport

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site is within the Alpertown Growth Area with a reasonable level of public transport accessibility providing and consistent with London Plan provides the opportunity for a more intensive use of the site, ideally through a vertically mixed use development of store/supporting uses and residential above. The site is of Archaeological Importance so proposals should demonstrate impacts and detailed consideration of BHC1 towards the significance of the heritage asset and its wider context. Development should provide a detailed analysis and justification of the potential impact of the development on the heritage asset. The store is in an out of centre location and trading well. There are no sequentially preferable locations available in Brent's town centres locally that could accommodate the store. Therefore, a retention of a supermarket of similar size on site would be sought. As an out of centre site, sequentially it is not the preferred location for additional retail space/town centre uses. Any such additional space will need to pass the sequential test and impact assessment. North of the site is the Grand Union Canal that is part of the green chain and falls under waterside development BGI1. Adhering to London Plan policy, the council will encourage the enhancement of green and blue infrastructure. An active frontage along Ealing Road would be desirable as well as positive frontages along Glacier Way and the Grand Union Canal. The opportunity to incorporate a boater facility hub on the site should be explored with the Canal and River Trust. Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated 	access improvements.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>through an energy strategy set out as part of its sustainability statement.</p> <ul style="list-style-type: none"> • The existing petrol station if kept or removed will have to be satisfactorily addressed in terms of impacts on potential residents. • Tall buildings will be appropriate on this site, taking its cue from the scale of immediately adjacent heights. • A small amount of the site falls under Flood zone 3a and is susceptible to surface water flooding, predominantly on highway land off Glacier Way. To the North of the site, surface water flooding risk comes from the canal. As the site is over one hectare, a site specific flood risk assessment will be required. • 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. • The site is located on an historical industrial site. A Preliminary Risk Assessment for contamination will be required, and if necessary remediation. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • Noise associated with the continued industrial use, or intensification of employment uses on the adjacent sites, plus the operation of the supermarket will need to be addressed in the design of development. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The use of Glacier Way as a TfL bus stand will also need be taken into account. <u>This must be retained or enhanced as part of any development and early discussion with TfL London Buses on this should take place.</u> Ealing Road is a London Distributor road. A transport assessment for the site will be required to determine the impact that development at this site will have on the transport network. 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 <p>Design Principles</p> <ul style="list-style-type: none"> Tall buildings will be appropriate on this site, taking its cue from the scale of immediately adjacent heights. Active frontage should be created along Ealing Road, <u>Grand Union Canal</u> and Glacier Way, with the Northwick Road positively addressed. Ideally, any replacement superstore will place its public entrance closer to Ealing Road, the main 'box' surrounded by smaller retail/commercial units or residential to remove the potential for dead frontage. There may be an opportunity to realign Northwick Road to create better development parcels/place. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • No specific infrastructure requirements identified beyond <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> • <u>Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> • Enhancement of blue infrastructure and consideration of sustainable infrastructure during master planning and construction. 	
MM85	5.7 South West Place	BSWSA3,page 253-254	<p><i>Amend parts of policy to read:</i></p> <p>Indicative Capacity 335 <u>450 dwellings</u></p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BD2)

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Timeframe for Delivery</p> <p>0-5 <u>1-5</u> Years 86 <u>110</u></p> <p>5-10 <u>6-10</u> Years 249 <u>330</u></p> <p>10+ <u>11+</u> Years</p> <p>Description of Existing Site</p> <p>The site comprises a mix of retail and commercial uses including restaurants, a banqueting suite that meets the Indian community's needs for large function space associated with weddings and festivals, a gym, a community church and associated car parking. There is also a former cash & carry. To the north the site boundary runs along Ealing Road and behind new mixed-use development, with the Piccadilly Line railway forming the western boundary. To the south of the site there is a modern development comprised of taller apartment blocks completed in 2011 as part of the previous Atlip Road A4 site allocation. Alperton underground station is located directly opposite the site along with a number of small retail units along Ealing Road.</p> <p>PTAL Rating</p> <p>3-5 <u>(current and 2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site falls under the Alperton regeneration and Growth Area and is allocated for residential led mixed use development. 	<p>and London Plan policies, incorporate essential infrastructure needs, address impacts on public transport capacity, ensure publically accessible routes, reflect Secretary of State's London Plan modification directions.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • The site includes a place of worship which must be re-provided at least to an equivalent scale/quality in any redevelopment. • The banqueting suite at the Atlip Centre is also a facility which meets a local community need related to function spaces for Indian weddings/cultural events. These community facilities should be replaced as this contributes towards the Ealing Road niche town centre offer as set out in the vision. • In addition, Some retail/main town centre uses will require inclusion within the scheme to provide an active frontage along the Ealing Road. • <u>Given Brent's need to provide for additional industrial floorspace</u> Brent's status as a provide capacity borough, the developer needs to consider provision of workspace. • <u>Located within a Tall Buildings Zone,</u> the site is appropriate for high-density development including tall buildings in part (as shown by the existing consent for 10 storeys) but however, any redevelopment must provide a comfortable relationship with adjacent residential development which is likely to remain, particularly and the two storey properties along Sunleigh Road. • The site contains no recognised heritage assets, however Alperton Station is Locally Listed and any future development must take care to preserve and enhance its heritage value. • A road access will need to be provided to connect the development from north to the south currently served by Atlip Road. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • <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> • The railway line along the northern boundary of the sites is designated as a wildlife corridor. Development <u>and associated works</u> should take care to protect this area from any works which would <u>not</u> compromise its biodiversity. • Consideration of It will also need to deal satisfactorily with the noise impacts of the railway. • The area covering Atlip Road falls under Flood zone 3a and is susceptible to surface water flooding. As the site is over one hectare a site specific flood risk assessment will be required. • 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. <p>Design Principles</p> <ul style="list-style-type: none"> • Building height and massing should build upon the established rhythm in this part of the <u>regeneration in</u> Alperton regeneration scheme, corresponding to the neighbouring buildings and stepping down towards the east of the site. • Development along Ealing Road should provide an active frontage to continue the road line of the retail units to the east of this site. • If Atlip Road is realigned, A clear and obvious inviting <u>'homezone'</u> pedestrian/cycle route from Ealing Road to the canal must exist, with 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>active frontage overlooking it. If Atlip Road is realigned it should have positive frontages addressing it.</p> <ul style="list-style-type: none"> The properties along Sunleigh Road must have defensible space/should not have rear fences along any public realm. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> The church, and community centre and banqueting hall should be re-provided as part of any future development in line with policy BS11 Social Infrastructure and Community Facilities. <u>This should be at least to an equivalent scale/quality in any redevelopment.</u> <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> <u>Atlip Road will form part of a continuous publicly accessible east/west walking/cycling route from Ealing Road along the northern edge of the canal running through the development sites BSWSA3/BSWSA4/BSWSA5/ BSWSA6/ BSWSA7).</u> <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Justification</p> <ul style="list-style-type: none"> This site is generally comprised of low density commercial and retail uses which have not maximised the development potential of the area. This allocation would allow this site to contribute to Brent's housing numbers within the designated Alpertown Growth Area, continuing development which has come forward as part of the previous Atlip Road allocation. The site's proximity to Alpertown Station make it an excellent location for residential use. 	
MM86	5.7 South West Place	BSWSA4, page 255-256	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use</p> <p>Mixed-use residential led development incorporating some replacement workspace industrial at ground floor level and potential commercial leisure use at ground floor level to take advantage of/ enhance the canal setting.</p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 198-33</p> <p>5-10 6-10 Years 197-165</p> <p>10+ 11+ Years 197</p> <p>Description of Existing Site</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies, incorporate essential infrastructure needs, address protected waste site, ensure publically accessible routes,

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>The site is comprised of low level industrial and commercial units with the Grand Union Canal to its south. The site has a low PTAL of 2-3 (2031 estimate) although this is likely to rise given the high levels of development currently proposed for the area. The site was allocated for development previously albeit at a lower density than currently proposed.</p> <p>PTAL Rating</p> <p>2-3 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> Two parcels within this allocation have planning permission (ref 18/0418 and 18/0320) to provide relatively low levels of development. Further The site sits within Alperton Growth Area and development should come forward at higher densities in line with neighbouring allocations and the wider Alperton regeneration area. The site's location adjacent to the Grand Union Canal requires development to be in conformity with policy BGI1 Green and Blue Infrastructure in Brent which requires developments adjoining the borough's Blue Ribbon network to pursue opportunities to improve public accessibility and its setting in relation to buildings and public realm. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath. The site is adjacent to the Grand Union canal and classified under Green Chain and Waterside Development Policy 	reflect Secretary of State's London Plan modification directions.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>BGI1, where management, integration and enhancement of existing green and blue infrastructure are encouraged.</u></p> <ul style="list-style-type: none"> • Developers should explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement. • 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 ahead of development to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements. • A new connecting homezone/pedestrian and cyclist street to the adjacent Atlip Road site to the west must be provided that creates a high quality direct route through site to link up with the same type of route in the adjacent Abbey Manufacturing Site Allocation. Publicly accessible walking/cycling routes through the development must be provided from Sunleigh Road and Woodside End to link to the new east/west pedestrian/cycle route, canal footbridge on Atlip Road and any new towpath/route along the northern edge of the canal across the site. • A small number of mature trees are located within the allocated area and should be retained where possible. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area • Mid-rise tall buildings will be appropriate on this site subject to detailed design analysis showing no adverse impacts and a 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>satisfactory relationship in terms of scale and massing being delivered with existing residential properties. <u>The site is within a Tall Buildings Zone where tall buildings are appropriate.</u></p> <ul style="list-style-type: none"> Given that the site is existing employment <u>industrial</u> land and Brent's status as a provide capacity borough, the council will require <u>the maximum viable amount of</u> no net loss of employment <u>industrial</u> floorspace, with re-provision probably provided on the ground floors of the new buildings and where necessary to meet capacity requirements on upper floors. <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> Piecemeal development of the site will not be allowed in advance of a masterplan/agreement between landowners on how the site will be developed comprehensively to provide a coherent development overall. New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity. <p>Design Principles</p> <ul style="list-style-type: none"> This site is suitable for mixed-use development similar to the adjoining scheme on Atlip Road completed in 2011. Comprehensive mixed-use development will be promoted to make the most effective use of land and secure better development outcomes. Flexible light industrial/maker workspace should be provided at ground floor level creating an active frontage to routes through the 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>site and frontage along the canal frontage where commercial leisure use to increase activity on the canal would be desirable.</p> <ul style="list-style-type: none"> • The site is appropriate for Tall buildings of a mid-rise nature that <u>should</u> provides a satisfactory relationship in terms of scale and massing <u>with</u> in relation to existing <u>adjacent</u> residential properties that will remain should be provided. • A clear and direct appropriately landscaped home zone route that gives priority to cyclists and pedestrians should be set out to promote greater permeability/connectivity through the site for cyclists and pedestrians in particular, suppressing the desire potential for rat-running of vehicles from adjacent areas. • Development should be <u>provide a publicly accessible landscaped</u> set back from the canal <u>in line with policy BGI1 Green and Blue Infrastructure</u> to promote a high quality landscaped publically accessible east/west route/towpath in which opportunities for access to the canal be enhanced. • <u>Publicly accessible walking/cycling routes through the development must be provided from Sunleigh Road and Woodside End to link to the new route along the northern edge of the canal across the site.</u> • <u>Vehicular access will be from Sunleigh Road and Woodside End.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • A publicly accessible <u>east/west walking/cycling</u> route <u>should be provided</u> adjacent to the <u>along the northern edge of</u> the canal side <u>as part of a wider continuous route running through the</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>development sites BSWSA3/BSWSA4/BSWSA5/ BSWSA6/ BSWSA7.</u></p> <ul style="list-style-type: none"> • A direct and high quality homezone route that links the site to Atlip Road and into the adjacent BSWSA5 sites, to create a continuous route through to Mount Pleasant. • <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> • <u>New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity.</u> • <u>Developers should explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</u> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> <p>Justification</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> This site is generally comprised of low density commercial and industrial uses which have not maximised the development potential of the area. This allocation would allow this site to contribute to Brent's housing numbers within the designated Alperton Growth Area, continuing development which has come forward on neighbouring sites and the immediate area. The site's proximity to Alperton Station make it an excellent location for mixed residential and employment industrial use. 	
MM87	5.7 South West Place	BSWSA5, page 257-259	<p><i>Amend parts of policy to read:</i></p> <p>Allocated Use</p> <p>Mixed-use residential-led development incorporating replacement employment industrial space, small scale retailing/commercial leisure and community uses (e.g. nursery).</p> <p>Indicative Capacity</p> <p>590 490</p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 300 14</p> <p>5-10 6-10 Years 290 286</p> <p>10+ 11+ Years 190</p> <p>Description of Existing Site</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3), London Plan policies, reflect Secretary of State's London Plan modification directions, ensure accessible routes and reflect revised Use Classes.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site sits within Alperton Growth Area and forms part of the wider regeneration scheme outlined in the Alperton Masterplan Supplementary Planning Document. The site was allocated for development previously albeit at a lower density than currently proposed.^{MM?} The site has a low PTAL of 2-3 (2031 estimate) although this is likely to rise given the high levels of development currently proposed for the wider area The north west corner of the site is vacant land and the rest of the site forms a large industrial estate comprising around 60 industrial/warehouse units, predominantly car repair businesses. The site extends from the northern towpath of the Grand Union Canal in the south to the rear garden boundaries of houses fronting Mount Pleasant and Woodside Close in the north and east. The site also bounds the under-construction Abbey Wharf residential development to the east and residential properties fronting Woodside Place and Woodside End to the west. The site is also in the Alperton Housing Zone. The site slopes from the north to the south. <p>PTAL Rating 2-3 (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> <u>The site is within a Tall Buildings Zone where tall buildings are appropriate.</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. The site's location adjacent to the Grand Union Canal requires development to be in conformity with policy BG11 Green and Blue Infrastructure in Brent which requires developments adjoining the borough's Blue Ribbon network to pursue opportunities to improve public accessibility and its setting in relation to buildings and public realm. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath. A small part of the site to the south falls under Flood zone 3a and is susceptible to surface water flooding. As the site is over one hectare a site specific flood risk assessment will be required. Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement. 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. A new connecting homezone/pedestrian and cyclist street to the adjacent BSWSA4 site to the west must be provided that creates a high quality direct route through the site to link to Mount Pleasant 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>on the east. Publicly accessible walking/cycling routes through the development must be provided from Woodside Close and Woodside End to link to the new east/west pedestrian/cycle route, canal footbridge on Atlip Road and any new towpath/route along the northern edge of the canal across the site that links BSWSA3 and the adjacent Abbey Wharf development to the west.</p> <ul style="list-style-type: none"> Given that the site is existing employment industrial land and the identified need within the Brent's status as a provide capacity borough, some maximum viable re-provision of employment industrial floorspace along the ground floors of the new buildings will be required as well as other potential uses such as small scale retail, commercial leisure or community uses (e.g. nursery). Given the size of the site, development should come forward as part of a comprehensive masterplan led approach should demonstrate and individual schemes which would compromise the most efficient land use of the site will be refused. New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity. <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> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Design Principles</p> <ul style="list-style-type: none"> • The site is appropriate for higher density and tall buildings of a mid-rise nature subject to detailed design analysis. It should provide a satisfactory relationship in terms of scale and massing in relation to existing residential properties that will remain should be provided. Buildings closer to the edges of the site should be of a complementary height to the existing suburban homes to which the site adjoin whilst buildings further from the edges could be of supported with a greater mid-rise massing. • Development coming forward should be denser than the surrounding suburban character. • It is suitable for tall buildings of a mid-rise height, that sits well subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing. This should be delivered in context with the residential properties in the neighbouring Abbey Wharf development which rises to six storeys and the surrounding two storey residential properties elsewhere that are likely to remain. The proposal should seek a housing mix of private and affordable and appropriate provision of family units. The development should demonstrate exemplar design quality. • The existing Woodside Place and Woodside End should be extended into the site providing Homezone type through roads that prioritise pedestrian and cyclist movements. A new connecting Homezone/pedestrian and cyclist street should be provided to the adjacent BSWSA2 site that forms a continuous link between the Atlip Road site to the west and Mount Pleasant. Pedestrian and cycle 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>routes should also link to any new towpath/route that is also provided along the northern edge of the canal across the site.</p> <ul style="list-style-type: none"> Affordable workspace and flexible light industrial/maker workspace, plus potential small-scale retail and community uses A1 or D1 uses should be provided at ground floor level creating an active frontage to routes through the site and frontage along the canal where commercial leisure use to increase activity on the canal would be desirable. Development should mitigate the transport impacts of the development clear and direct appropriately landscaped home zone route/routes that gives priority to cyclists and pedestrians should be set out to promote greater permeability/connectivity through the site for cyclists and pedestrians in particular, suppressing the desire potential for rat-running of vehicles from adjacent streets/areas. Development should be provide a publicly accessible landscaped set back from the canal in line with policy BGI1 Green and Blue Infrastructure to promote a high quality landscaped publically accessible east/west route/towpath in which opportunities for access to the canal be enhanced. <u>Vehicular access will be from Mount Pleasant and Woodside End.</u> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> A publicly accessible east/west walking/cycling route should be provided adjacent to the along the northern edge of the canal side as part of a wider continuous route running through the development sites BSWSA3/BSWSA4/BSWSA5/ BSWSA6/ BSWSA7. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> A direct and high quality homezone route that links the site to Atlip Road to create a continuous route <u>from Woodside End</u> through to Mount Pleasant. <u>Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</u> <u>New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity.</u> Consideration of blue/green and sustainable infrastructure in masterplanning and during development. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> <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> 	
MM88	5.7 South West Place	BSWSA6, page 260-261	<i>Amend parts of policy to read:</i>	To increase brevity and make

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Allocated Use</p> <p>Mixed-use residential-led development incorporating employment industrial uses.</p> <p>Indicative Capacity</p> <p>135 147</p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 135 33</p> <p>5-10 6-10 Years 104</p> <p>10+ 11+ Years</p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> The site forms an industrial estate comprising various warehouse units and office buildings of poor quality. Beresford Avenue runs along the northern boundary of the site with the Grand Union Canal forming the southern boundary. The site is adjacent to the under-construction Abbey Wharf residential development to the west and meets the forthcoming Northfields development to the east. Part of the site has approved planning application 18/0752 <p>Planning History</p>	<p>consistent approach across the housing trajectory, Local Plan (Policy BE3 and Policy BD2) and London Plan policies, reflects Secretary of State's London Plan modification directions, ensure publically accessible routes, reflect revised Use Classes and incorporate essential infrastructure needs.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> Planning application 18/0752 for the demolition of existing buildings at Afrex House, and redevelopment to provide a residential development of 3-5 storeys for 31 residential units (9 x 1bed, 18 x 2 bed, 4 x 3 bed), creation of public realm and alterations, landscaped amenity space, car and cycle parking and all associated works. Off-site contribution made towards affordable workspace. <u>Residential</u> prior approvals in the Liberty Centre <p>PTAL Rating</p> <p>2 (<u>current and</u> 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site sits within Alperton regeneration and Growth Area and forms part of the wider regeneration scheme outlined in the Alperton Masterplan Supplementary Planning Document. The site was allocated for development previously albeit at a lower density than currently proposed. <u>The site is within a Tall Buildings Zone where tall buildings are appropriate.</u> Given that the site is an existing employment <u>industrial</u> land and <u>the identified need within the</u> Brent's status as a provide capacity borough, <u>the maximum viable</u> re-provision of employment <u>industrial</u> floorspace along the ground floors of the new buildings will be required. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • The site has a low PTAL of 2 (2031 estimate) although this is likely to rise given the high levels of development currently proposed for the wider area. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • The site's location adjacent to the Grand Union Canal requires development to be in conformity with policy BG11 Green and Blue Infrastructure in Brent which requires developments adjoining the borough's Blue Ribbon network to pursue opportunities to improve public accessibility and its setting in relation to buildings and public realm. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and enhancement of biodiversity and the multiple needs of the users of the canal and towpath. • Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement. • 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. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> A new connecting towpath/route along the northern edge of the canal across the site that links to BSWSA5 and the adjacent Northfields. New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity. <p>Design Principles</p> <ul style="list-style-type: none"> Development coming forward should be denser than the surrounding suburban character and is suitable tall buildings of a mid-rise height (potentially around 6 storeys), subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing being delivered with the surrounding two storey residential properties that are likely to remain on Beresford Avenue. Flexible light industrial/maker workspace, plus potential retail/commercial, leisure or community A1 or D1 uses should be provided at ground floor level. Proposals should seek to introduce active frontages along Beresford Avenue and the canalside. Development should be provide an appropriate set back that is publicly accessible and landscaped set back from the along the canal to promote a high quality landscaped publically accessible east/west route/towpath in which opportunities for access to the canal be enhanced. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will need to balance the protection and 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>enhancement of biodiversity and the multiple needs of the users of the canal and towpath.</p> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • A publicly accessible <u>east/west walking/cycling</u> route <u>should be provided</u> adjacent to the along the northern edge of the canal side <u>as part of a wider continuous route running through the development sites BSWSA3/BSWSA4/BSWSA5/ BSWSA6/BSWSA7.</u> • <u>New moorings will be required subject to not having an impact on the canal's navigability, water quality and biodiversity.</u> • Green/blue and sustainable infrastructure should be part of the development process and the development. • <u>Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement.</u> • <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> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</u>	
MM89	5.7 South West Place	BSWSA7, page 262-263	<p><i>Amend parts of policy to read:</i></p> <p>Existing Use <u>Mixed use</u> (Industrial <u>with residential under construction</u>)</p> <p>Allocated Use Mixed-use residential-led scheme</p> <p>Indicative Capacity 2900 <u>3,030 new homes</u></p> <p>Timeframe for Delivery 0-5 <u>1-5</u> Years 752 <u>400</u> 5-10 <u>6-10</u> Years 750 <u>974</u> 10+ <u>11+</u> Years 1398 <u>2,056</u></p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> The site is located to the south of Beresford Avenue and north of the A406 North Circular Road at the east of Alperton. The Grand Union 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE2) and London Plan policies, reflects Secretary of State's London Plan modification directions, update in accordance with extant permission, provide clarity in line with TfL Spatial Planning, ensure publically accessible routes and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Canal runs to the south western edge of the site, and the River Brent runs through the site, dividing it into two parcels.</p> <ul style="list-style-type: none"> The site has a total area of 9.16ha, The majority of the site which is to the north of the River Brent (8.1ha), while the smaller southern part has an area of 1.06ha. The majority of the site (with the exception of a small area at the north-west) smaller southern part (1.06ha) of the site is part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan. The north-west part was formerly that is not SIL land is a non-designated Local Employment Site. There are no conservation areas or listed buildings within or adjacent to the application site. The nearest listed building to the site is the Grade II listed "Brent Viaduct" over the North Circular Road. The site comprises brownfield land the majority of which was formerly in use as an industrial estate, most recently accommodating a range of low density uses such as car workshops, car dealers, storage, and industrial uses. Much of the site has previously been cleared (and used as open air storage) and comprises areas of hardstanding, although there are some vacant predominantly single and two storey commercial buildings to the centre and western part of the site, and Three industrial units remain along Beresford Avenue and are currently occupied under different ownership. There is also a temporary information centre with associated parking that is accessed from Beresford Avenue towards the west of the site. Stonebridge Park station is approximately a 1km walk along Beresford Avenue and the Old North Circular Road to the north east of the site and Alperton Underground station is approximately a 1.5km walk along Mount Pleasant and Ealing Road to the west, and 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>there are local bus stops on Beresford Avenue and the North Circular Road.</p> <p>Planning History</p> <ul style="list-style-type: none"> Approved hybrid planning permission application-18/0321 is a hybrid planning application as amended by permission 19/2732 for the comprehensive redevelopment of the former Northfields industrial estate. The scheme proposes demolition of all existing buildings on site and the delivery of a mixed-use development including 2,900 3,030 homes, around 2,300sqm commercial floorspace, a minimum of 17,581sqm and up to 19,000sqm employment floorspace and 1,610sqm community and assembly and leisure floorspace (use classes B1a, B1c and B8), up to 2,900sqm community and assembly and leisure floorspace (uses classes D1 and D2), an energy centre, public and private open space, new routes and public access along the River Brent and Grand Union Canal, parking and cycle provision and new site access and ancillary infrastructure. <p>PTAL Rating</p> <p>0-3 (current and 2031 estimate). May be revised in light of new development</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> To the south of the site is the boundary of the Old Oak and Park Royal Opportunity Area identified by the London Plan and its respective Planning Framework SPG. 	

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			<ul style="list-style-type: none"> • South of the site is categorised as Flood zone 3a and 3b and susceptible to surface water and fluvial and tidal flooding. As the site is over one hectare a site specific flood risk assessment will be required. • Parts of site adjacent to the Grand Union and River Brent are classified under waterside development Policy BGI1 where enhancement and use of Blue Ribbon Network are encouraged. Grade II SINCR River Brent West of Stonebridge forms the wildlife corridor. East and South of the site is bordered by the green chain where Policy BGI1 applies. The developers need to take into consideration the biodiversity and its recreational function that are important contributing factors to health and well-being of the community. The planning permission includes riverside meadows and semi-naturalisation. • Should the opportunity arise through any revisit of the planning permission then the Environment Agency has identified the need for potential for a fish easement of the river weir to be considered. • Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings demonstrated through an energy strategy set out as part of its sustainability statement. • The site is located within an Air Quality Management Area. Due to the North Circular passing south of the site, development at this site should be air quality positive as it falls under the Growth Area. Noise associated with the adjoining roads and continued industrial/employment uses south of the site will need to be addressed in the design of the development. 	

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			<ul style="list-style-type: none"> 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. Consistent with planning permission 18/0321 due to the site's historic SIL designation a minimum of 17,581 sq.m. of industrial employment floorspace of the typology and affordability associated with that planning permission must be re-provided as part of the development. Due to Brent's identified need 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. <p>Risks</p> <ul style="list-style-type: none"> The development will result in increased use of the road network by vehicles, cyclists and pedestrians. However, the scheme includes improvements to Beresford Avenue and the route to Stonebridge Park Station. The impact on the road network has been assessed by Brent and TfL, who consider the proposed Transport Assessment to be acceptable, subject to agreed mitigation measures. Delivery timescales dependent on market appetite. Potential need for Compulsory Purchase Order of later phases to ensure delivery of site not owned by Berkley Homes. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Design Principles</p> <ul style="list-style-type: none"> • High quality public realm with street planting to be delivered in early phases of the masterplan. • East-west green pedestrian and cycle spine connecting new development to existing urban areas and Stonebridge park station, the canal and Alperton. • It should cater to resident's needs by providing local amenities and facilities such as shops, cafés and restaurants, and community centre. A community centre is important to involve the local community. • Active frontage on ground floor. • Designing a cohesive residential neighbourhood with a variety of building typologies ensuring permeability to existing streets. • Opening up the canal with appropriate setback and landscaping. Improved connections and new routes and carriageway widening. • Design should respond to the various environments around the site, from housing in the north to large industrial units and the North circular in the south. It should encourage footfall to and through the site from the wider area <u>through appropriate set back/ improved connections/ new routes/carriageway widening and publicly accessible landscaped set back from the canal in line with policy BGI1 Green and Blue Infrastructure.</u> • 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</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>permission 18/0321 (as amended by application 19/2732)</u>. Given the scale of the site, it can create a new building height character.</p> <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • The development includes a community facility, children's nursery and health clinic where this has support from the CCG which would provide services to both the new and existing communities.In addition, significant contributions would be secured through the Community Infrastructure Levy. Brent CCG requires a healthcare facility of circa 800sqm fitted out and to be delivered prior to first occupation of the first 600 units across the development. This facility should be located to the west of the site in line with its requirements. • Improvements to Beresford Avenue and the link to Stonebridge Park station would improve pedestrian and cycle facilities and safety, including crossing facilities. • <u>A publicly accessible east/west walking/cycling route should be provided adjacent to the along the northern edge of the canal side as part of a wider continuous route running through the development sites BSWSA3/ BSWSA4/ BSWSA5/ BSWSA6/ BSWSA7.</u> • <u>Contributions to improve Beresford Avenue, the bus network, Stonebridge Park station and surrounding walking/cycling routes to mitigate the impact of the development on the surrounding movement network.</u> • <u>Developers will be encouraged to explore the use of canal water as a low carbon energy source to heat and cool buildings</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>demonstrated through an energy strategy set out as part of its sustainability statement</u></p> <ul style="list-style-type: none"> • <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> <p>Justification</p> <ul style="list-style-type: none"> • The approved scheme seeks to provide for the redevelopment of this industrial site with a high density, residential-led mixed-use development. It will provide 2,900 3030 homes, industrial employment floorspace, community, retail and leisure facilities and includes both a health centre and an energy centre. • To support the incoming residents and workers, and to enhance the wider community the proposal includes improved pedestrian, cycling and vehicular connections (including improved access to public transport); publicly accessible spaces (including the provision of level access), will open up the Grand Union Canal, and River Brent to the public; and provide a range of green spaces, open spaces and formal/informal play areas. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM90	5.7 South West Place	BSWSA8, page 265-266	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 263 310</p> <p>5-10 6-10 Years 460 113</p> <p>10+ 11+ Years 237 227</p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> The site forms part of Wembley Regeneration and Growth Area and falls within Wembley town centre boundary. It was formerly a long term allocation relating to a larger site in the Wembley Area Action Plan (WAAP). Since then Westernmost plot has come forward for is the residential-led development known as Chesterfield House. The developable site area has been scaled back from the previous allocation due to lack of viability of building over railway tracks. The current site forms the northern side of Wembley High Road between Wembley Triangle to the east and the Chesterfield House development to the west. The site extends up to the southern edge of the Chiltern Line and is located in a prime position between the emerging Wembley Park development and Wembley town centre. Buildings along the High Road range from two and three storey units with retail at ground floor level and residential above to taller commercial units opposite the former Copland School. Chesterfield House rises in part to 26 storeys. 	To increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies, reflects use classes changes, provide clarity in line with TfL Spatial Planning and incorporate essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Planning History</p> <p>Planning permission (application ref: 18/3111) mined to approve subject to signing of S106 obligation March 2019 for the erection of 2 residential blocks (17 and 19 storeys) connected at ground floor level comprising 256 self-contained apartments alongside 166sqm of flexible workspace.</p> <p>PTAL Rating</p> <p>5-6a (current and 2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> • <u>The site falls within the Tall Building Zone so is appropriate for tall buildings.</u> • <u>A key aspect of the development of the High Road area is maintaining viability and vitality of Wembley town centre.</u> • The site contains a Site of Archaeological Importance, the former Wembley Hill Farm. Development should provide a detailed analysis and justification of the potential impact of the development on the heritage asset. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area. • The land adjacent to the Chiltern Line railway is designated as a Wildlife Corridor and a Grade I Site of Importance for Nature Conservation. The site has good habitat connectivity and provides a mature habitat within the suburban landscape and The role of the 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>wildlife corridors should be protected from development which would compromise its biodiversity or recreational function. should not</p> <ul style="list-style-type: none"> • <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> • This site is in an area where the night time economy is encouraged to expand. Development should take account of this and create flexible space where possible. • Commercial development complementary to the role of the town centre should be re-provided in active frontages along the Wembley High Road. • Given the identified need within the Brent's status as a provide capacity borough, the Council will seek <u>maximum viable</u> no net loss of employment floorspace <u>reprovision, existing industrial should be reprovided as</u> and encourage to maximise its provision suitable for B1 (c), B8 and B2 use. <u>research and development/light industrial/general industrial/storage or distribution.</u> • The potential to create a secondary pedestrian street/continuous public realm along the rear of the High Road from Chesterfield House to Ecclestone Place. • Small portion of the site is categorised as Flood zone 3a and susceptible to surface water and fluvial and tidal flooding. As the site is over one hectare a site specific flood risk assessment will be required. • Landowners and site developers are encouraged to work together to ensure masterplan <u>led approach</u> delivery as this is more likely to happen. Where the timing of delivery of a comprehensive scheme 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>consistent with policy is adversely affected by lack of co-operation, consistent with its need to deliver timely outputs to meet the Plan's targets, the council will consider the use of compulsory purchase if required.</p> <ul style="list-style-type: none"> 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. <p>Design Principles</p> <ul style="list-style-type: none"> A key aspect of the development of the High Road area is maintaining viability and vitality of Wembley town centre. Development should support these objectives and will need to be in keeping with providing improved public realm and pedestrian access through this area. Building height and massing should build upon the established rhythm along this part of Wembley High Road, corresponding to the neighbouring Chesterfield House and stepping down towards the east of the site. Density should reflect the site's high PTAL. <u>The potential exists to create a secondary pedestrian street/continuous public realm along the rear of the High Road from Chesterfield House to Ecclestone Place.</u> 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> The ground floor on the High Road frontage should contain active frontage of main town centre uses between Wembley Triangle and the retail units to the west. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Developers should give consideration to Green and sustainable infrastructure in master planning stage. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> 	
MM91	5.7 South West Place	BSWSA9, page 267 -268	<p><i>Amend parts of policy to read:</i></p> <p>Timeframe for Delivery</p> <p>0-5 <u>1-5</u> Years 250</p> <p>5-10 <u>6-10</u> Years</p> <p>10+ <u>11+</u> Years</p>	To increase brevity and make consistent approach across the housing trajectory, Local Plan and London Plan policies and incorporate

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			<p>Description of Existing Site</p> <p>The site sits on the south side of Wembley High Road and a cleared site that was formerly Ark Elvin Academy (former Copland School). It is adjacent to the former Brent House site, which is currently under construction to provide recently developed for 248 new homes with flexible commercial space at ground floor. To the south of the site sits the newly built Ark Elvin Academy, while to the east and west Wembley Park and Wembley town centres are a short walk away.</p> <p>Planning History</p> <p>Previously allocated for development in the Wembley Area Action Plan <u>None</u></p> <p>PTAL Rating</p> <p>6a <u>(current and 2031 estimate)</u></p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site is within the defined Wembley town centre boundary and was previously identified as an opportunity site that is suitable for redevelopment and sensitive to tall buildings within the Wembley Area Action Plan (WAAP). and provides the opportunity to <u>introduce</u> an active frontage <u>that has been missing along this part of the town centre</u> must be created to the <u>along</u> northern edge of the site along the High Road. 	essential infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • The high PTAL provides the opportunity for higher density development. • The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area • The site contains a Site of Archaeological Importance, the former Wembley House. Development should accord with policy BHC1 Brent's Heritage Assets and provide a detailed analysis and justification of the potential impact of the development on the heritage asset. • Vehicular access to the site will be from Cecil Avenue. • A London Plane subject to Tree Preservation Order exists on the north eastern side of the site. Developers should have regard of existing verges and tree stock on site. • The site is adjacent to a secondary school, so will need to ensure that its operation as an effective place for education is not compromised. • The inclusion of community use floorspace that would otherwise be provided through the redevelopment of the former Wembley Youth Centre and Dennis Jackson Centre would create a more useable community space and increase housing capacity on that site. • A very small portion of the site is categorised as Flood zone 3a and susceptible to surface water. Any development on site should consider mitigation of surface water flood. • 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 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>delivered prior to the development creating identified additional capacity requirements.</p> <p>Design Principles</p> <ul style="list-style-type: none"> • The site is suitable for tall buildings, but of a mid-range height that Building heights should mediate between the development of the former Brent House (10 storeys) and the hotel across Cecil Avenue (7-8 storeys). Taking account of the topography and scale of development along Cecil Avenue towards the rear of the site, development should step down southwards. • The ground floor on the High Road frontage should contain a continuous active frontage of main town centre uses to continue the road line between the former Brent House development and the retail units to the west. Development along Cecil Avenue must positively address the street and entrance to the Ark Elvin school, whilst to the east should face outwards along the school access route from the High Road. • <u>Vehicular/servicing access to the site will be from Cecil Avenue and</u> safe access to the Ark Elvin Academy along Cecil Avenue. • Sufficient space should be provided along the High Road to allow street or on site tree planting to enhance the public realm on this part of the street. • Servicing access should be off Cecil Avenue. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> • No specific infrastructure requirements identified. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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. Public sewers cross or are close to the site. The risk of damage during construction must be minimised. It must be ensured that development doesn't inhibit access for maintenance or the services in any other way.</u> <u>Consideration should be given to the inclusion of community use floorspace that would otherwise be provided through the redevelopment of the former Wembley Youth Centre and Dennis Jackson Centre. This would create a more useable community space and increase housing capacity on that site.</u> 	
MM92	5.7 South West Place	BSWSA10, page 269-270	<p><i>Amend policy name:</i></p> <p>BSWA10 <u>BSWSA10</u> Elm Road</p> <p><i>Amend parts of policy to read:</i></p> <p>Existing Use</p> <p>Commercial use, hotel, parking, vehicle repair garage, residential, mixed-use residential, employment, church</p>	Correct policy name reference, increase brevity and make consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies and incorporate essential

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Allocated Use</p> <p>Mixed-use town centre use within town centre boundary, Mixed used residential led development, Hotel and supporting community facilities</p> <p>Indicative Capacity</p> <p>400</p> <p>Timeframe for Delivery</p> <p>0-5 1-5 Years 200</p> <p>5-10 6-10 Years 200 400</p> <p>10+ 11+ Years</p> <p>Description of Existing Site</p> <ul style="list-style-type: none"> Part of the site is within the Wembley town centre boundary comprising of comprises a large format retail unit of Primark and Pound store. The site runs along the side street St. John's Road with mixed use and small retail parade, a large car park and car repair garage. Towards the east is the Spiritualist church and parallel to the High Road is Elm Road with building stock of 2-3 terraced houses and a three storey Euro Hotel. North of the site is bounded by Grade I Chiltern Line /wildlife corridor. Wembley Central station and bus stops are less than 200m from the site. 	infrastructure needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>PTAL Rating</p> <p>PTAL 4-6a (current) increasing to 5-6a by (2031 estimate)</p> <p>Planning Considerations</p> <ul style="list-style-type: none"> The site sits within the wider Wembley Growth Area and Wembley regeneration. Part of the site on Wembley High Road falls within the town centre boundary with primary and secondary shopping frontage. The An active frontage of main town centre uses will have to be maintained. As the site borders the Wembley High Road, the developer should carry out a viability and vitality assessment for provision of mixed use suitable for secondary frontage. The High Road frontage should contain main town centre uses. The approved aparthotel redevelopment will demolish the exiting Euro Hotel. The site contains a church and any future development of this must take care to provide accessible replacement community facilities. As Brent is a provide capacity borough in the London Plan, Given the identified need within the borough, the loss of the garage means that employment maximum viable industrial floorspace use should be re-provided through a net increase in employment industrial floor space. The site is bordered in the west and north by SINC Grade I Chiltern railway line linking a number of wildlife sites. Development should adhere to the London Plan policies and Brent's Policy BGI1 that sets a local requirement for the protection and enhancement of wildlife corridor. 	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> • There are a number of trees across the site which should be retained where possible. • The site is within an Air Quality Management Area so development will need to be air quality positive given it is within the Growth Area. • PTAL is high so parking provision should be minimal with consideration given to the signed cycle route. St. John's Road should remain a high quality road to connect traffic. • The development needs to deal adequately with the noise impacts of the railways. • Given the size of the site and its multiple ownership, development should come forward as part of a comprehensive masterplan and individual schemes which would compromise the most efficient land use of the site will be refused. • Parts of the site is flood zone 3a and susceptible to surface water flooding, predominantly adjacent to the railway tracks. A site specific flood risk assessment will be required ensuring highest feasible environmental standards. <p>Design Principles</p> <ul style="list-style-type: none"> • Development coming forward should provide active frontage along all publicly visible areas. • <u>Density should be reflective of the site's high PTAL.</u> Along the High Road, height should relate to adjacent heritage buildings <u>and reflect the character of the area.</u> The rest of the site is suitable for tall buildings of a mid-rise height of 5-6 storey to mediate a satisfactory relationship of scale and massing already existing in the surroundings and take into account the topography. 	

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			<ul style="list-style-type: none"> The hotel development should positively address the street and should be designed in line with principles set out in planning application 18/4063. The developer should provide significant new pubic public space, maintain pedestrian access through the site and high-quality public realm to encourage use throughout the day. The developer should benefit from the site's high PTAL. Proposals should seek to retain existing road network with frontage along the site. Appropriate setback will be encouraged to balance the protection and enhancement of the wildlife corridor north of the site. The existing tree stock of mature trees should be retained and positively addressed by any proposed building. <p>Infrastructure Requirements</p> <ul style="list-style-type: none"> Accessible community facilities should replace the church, high quality route on St. John's Road with pedestrian and cycle facilities. Consideration of sustainable infrastructure. <u>Thames Water has indicated the local water network capacity in this area may be unable to support the demand anticipated from this development. Upgrades to the wastewater network are likely to be required. 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> 	

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			<p>Justification</p> <ul style="list-style-type: none"> • This site is included in the Wembley Growth Area. It is generally comprised of low density commercial use which has not maximised the development potential of the area. • This allocation will allow the site to contribute towards Brent's housing numbers, community facilities, retail and employment floor space. New developments have come forward on neighbouring sites. • The site's excellent PTAL and its close proximity to Wembley Central Station, bus routes and High Road make it a good location for residential and employment use. 	
MM93	5.7 South West Place	BSWSA 11, page 271	<p><i>Amend 'comments' of the policy to read:</i></p> <p>Comments Part of Former WAAP W4, so principle of development considered acceptable. Suburban scale development.</p>	Clarity
	5.7 South West Place	BSWSA 12, page 271	<p><i>Amend parts of policy to read:</i></p> <p>Allocated use Residential/commercial/employment (Business Use Class)</p> <p>Indicative homes 24 22</p> <p>Comments</p>	To provide clarity following changes to the Use Classes Order, make consistent approach across the housing trajectory and reflect town centre frontage flexibilities.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Ground floor commercial/ employment-use maximised, with upper storeys residential	
	5.7 South West Place	BSWSA 15, page 271	<p><i>Amend parts of policy to read:</i></p> <p>Address Employment Land on Heather Park Drive</p> <p>Allocated use Residential/employment industrial use</p> <p>Indicative homes 28 36</p> <p>Comments Mixed use residential with maximum replacement employment light industrial, general industrial or storage and distribution floorspace.</p>	Consistent approach across the housing trajectory, Local Plan (Policy BE3) and London Plan policies.
	5.7 South West Place	BSWSA16, page 271	<p><i>Amend part of policy to read:</i></p> <p>Indicative homes 80 120</p>	To match dwelling numbers in housing trajectory.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
	5.7 South West Place	BSWSA 17, page 271	<p><i>Amend part of policy to read:</i></p> <p>Indicative homes</p> <p>150 170</p>	To match dwelling numbers in housing trajectory.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM94	6.1 Design	BD2, page 276	<p><i>Amend part of the policy to read:</i></p> <p>A tall building is one that is more than 6 metres above the general prevailing heights of the surrounding area or more 30 metres in height</p> <p>Tall buildings are directed to the locations shown on the policies map in Tall Building Zones, intensification corridors, town centres and site allocations.</p> <p>In Tall Buildings Zones heights should be consistent with the general building heights shown on the policies map, stepping down towards the Zone's edge. In intensification corridors and town centres outside conservation areas and areas of distinctive residential character developments of a general building height of 15 metres above ground level could be acceptable, with opportunities to go higher at strategic points in town centres.</p> <p>Elsewhere tall buildings not identified in site allocations will only be permitted where they are:</p> <p style="padding-left: 40px;">a) of civic or cultural importance; or</p>	To be consistent with London Plan Policy D9.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
		6.1.13-6.1.22	<p>b) on sites of a sufficient size to successfully create a new character area while responding positively to the surrounding character and stepping down towards the site edges.</p> <p>In all cases the tall buildings must be shown to be positive additions to the skyline that would enhance the overall character of the area. They should be of exceptional design quality, consistent with London Plan Policy requirements in showing how they positively address their visual, functional, environmental and cumulative impacts.</p> <p>6.1.13 Height is only one element of a development when considering its acceptability and whether it is of good design. Nevertheless, it is a significant one in terms of increasing the visibility of a development and its potential wider impact on an area's character. London Plan Policy D89 requires <u>identifies that</u> the Brent Local Plan to should provide a definition of a tall building and identify areas where tall buildings are acceptable. The council has done this in a number of different types of location taking account of factors such as those identified in D89 and other London Plan policies D1 London's Form, Character and Capacity for Growth, D24 Delivering Good Design and D46 Housing Quality and Standards, including Table 3.2.</p> <p>6.1.14 The Local Plan policies map identifies Tall Building Zones which will each be able to accommodate differing scales of tall buildings including those of 30 metres or more. (A residential tall building typically has a floor to floor distance of around 3 metres. So a 30 metre residential building would typically be approximately 10 storeys in height). It sets out the general building heights that would be appropriate in the Zones. This has been based on extensive analysis consistent with London Plan Policy D24 criteria a, b and c, as set out in Brent's Tall Buildings Strategy 2019. This includes factors such</p>	

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			<p>as a consideration of Brent's prevailing character, a desire to create clusters of tall buildings rather than standalone ones, and concentrating the densest development in areas with good public transport accessibility such as growth areas, on site allocations and other areas of intensification such as principal movement corridors and town centres.</p> <p>6.1.15 Any reference within any place, site specific or design policy in this plan to number of storeys is for residential storeys. Proposals for commercial premises should be consistent with the parameters set by the height in metres for the identified number of residential storeys. The heights identified for the Tall Buildings Zones, town centres and site allocations are based on a high level of analysis, rather than in many cases considering a detailed building design. They indicate the heights likely to be generally acceptable to the council. <u>This does not mean that all buildings up to these heights are automatically acceptable. Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location.</u> There might however <u>also</u> be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.</p> <p>6.1.16 Within the areas identified <u>there should be variety in heights to add to visual interest to the skyline. Whilst</u> there will need to be a progressive stepping down of buildings to the edge of the tall buildings zone, <u>to respect the existing lower scale character of adjacent areas, this can be subtle and incorporate variety of building heights, it does not have to be a strictly linear progression.</u> Exceptions to stepping down will be where longer term (post 2041) higher density intensification is likely to occur, for example east beyond the current Wembley Growth Area.</p>	

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			<p>6.1.17 In town centres (outside conservation areas and areas of distinctive character) and intensification corridors <u>outside conservation areas and areas of distinctive residential character</u>, to support increased density to deliver a significant number of new homes, well designed taller buildings (compared to existing heights) are likely to be supported. Typically, these areas have reasonably good access to public transport and a range of services/facilities which could be better supported with increased patronage of new building occupants. The intensification corridors are main (A) roads where public transport accessibility level is 3 or above, and where the width of the street indicated by the distance between properties front to front (<u>typically, but not exclusively 22.5 metres</u>) and space/relationship with properties to the rear indicate scope for increase in height. The character of these places is such that the significant height associated with Tall Building Zones is not considered appropriate in these locations through the work that has been done to date in supporting the Local Plan, including the Tall Buildings Strategy. Nevertheless, taller buildings, typically of around 15 metres (5 storeys), with the opportunity to go higher at strategic points in town centres (e.g. locations adjacent to stations) could be appropriate. Buildings should in these locations reduce in scale towards adjacent properties on side streets.</p> <p><u>6.1.18 Similar to the Tall Buildings Zones</u>, whilst town centres and intensification corridors have been identified to be acceptable for taller buildings, development will still need to be consistent with other Development Plan policies, including BD1. It might be that for example policies that relate to heritage assets or the amenity of neighbouring properties will reduce the appropriate height below those identified. In addition, the opportunities for increases in height consistent with this policy are more likely to be acceptable where a more comprehensive development takes place including a whole or significant parts of a terrace, or in the case of detached and semi-detached buildings a number of adjacent properties. This</p>	

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			<p>will allow for instance better relationships between proportions of width to height and probably greater development capacity to be achieved. The council will provide further guidance on preferred solutions for different blocks of properties within individual town centres and intensification corridors.</p> <p>6.1.19 Elsewhere, recognising the need in particular to promote new homes and places for work, in other locations, flexibility may be allowed on height compared to existing buildings (potentially up to 6 metres). Outside of Tall Building Zones, town centres and intensification corridors the council as a result of the detailed analysis it has undertaken for the Brent Tall Buildings Strategy, considers opportunities for tall buildings are likely to be more limited.</p> <p>6.1.20 The council does however recognise that historically buildings that would be defined as tall in policy BD2 have been developed in low rise suburban locations and have positively added to the character of a place. This might have been buildings of civic or cultural importance such as places of worship that will have incorporated features taller than the prevailing surrounding buildings, that they warrant landmark status. Another example includes well designed taller mansion blocks.</p> <p>6.1.21 Whilst identifying priority locations for tall buildings, the council does not want to stifle opportunities for good development elsewhere that might be tall but not necessarily inconsistent with good design and other desired policy outcomes. The council recognises that it does not yet know all sites that will be developed over the lifetime of the plan. Extensive areas might come forward for redevelopment that might not be subject to an allocation. A recent example Northfields shows that large sites can create the opportunity for new character areas that complement the surroundings and</p>	

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			<p>are appropriate to accommodate tall buildings. As such the policy seeks to allow for some flexibility where it can be justified, to allow for tall buildings outside areas identified in the Plan, such as in the case of civic or cultural buildings, or sites of a scale which complement that of adjacent areas. As with other areas covered by the policy there should be a stepping down to form a positive relationship with remaining adjacent properties.</p> <p>6.1.22 In all cases the tall buildings element must be of such a design quality that it should enhance the character of the place within which it is set. London Plan policy D89 contains criteria for the assessment of the appropriateness of tall buildings applications, including visual functional, environment and cumulative impacts. This together with design policies D1, D3, D24, and D46 (incl. Table 3.2) and D6 forms a detailed policy framework against which the design merits of a tall building can be considered. In addition, Brent Local Plan policies, Brent Tall Buildings Strategy and the Brent Design Guide SPD1 identify a range of matters to appropriately address some of which include:</p> <ul style="list-style-type: none"> a) Visual impacts: <ul style="list-style-type: none"> · Positive contributions to views from different distances · Positively reinforcing the hierarchy of place and assist wayfinding · Elegant, with exemplary architectural quality and materials · Buildings positively contributing to the character of an area, including impacts on heritage assets · No adverse reflected glare b) Functional Impacts: <ul style="list-style-type: none"> · Internal design to ensure safety of occupants · Servicing, maintenance and management · Accesses and ground floor uses ensuring no · Movement capacity in the area · Sufficient infrastructure provided 	

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			<ul style="list-style-type: none"> · Benefits to wider area maximised · No adverse effect on aviation, navigation, telecommunication and solar energy generation c) Environmental Impacts: <ul style="list-style-type: none"> · Wind, daylight, sunlight and temperature conditions · Support air movement · Noise d) Cumulative Impacts: <ul style="list-style-type: none"> · Combined impacts of numerous buildings in one place <p>LONDON PLAN D1 London's Form, Character and Capacity for Growth Policy D1A2 Infrastructure Requirements for Sustainable Densities Policy D1A3 Optimising Site Capacity Through a Design Led Approach Policy D24 Delivering Good Design Policy D89 Tall Buildings</p> <p>BRENT Brent Tall Building Strategy Brent Design Guide SPD1</p>	
MM95	6.1 Design	BD3, page 280	<p><i>Add new part g) to the policy to read:</i></p> <p>Proposals for basement development of an existing property must:</p> <ul style="list-style-type: none"> f) Ensure any lightwells are modest in scale, preferably located to the rear and if located to the front are no more than whichever is the smaller of 800mm or half the length of the garden. g) <u>Be protected from sewer flooding by a suitable pumped device</u> 	Clarity on measures required to reduce potential risk of basement flooding.

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MM96	6.2 Housing	6.2.6, page 283	<p><i>Amend para 6.2.6 to read:</i></p> <p>The Brent Strategic Housing Market Assessment 2018 (SHMA) identified a need for <u>approximately 48,000</u> additional homes between 2016-2041. This is equivalent to 1,920 dwellings per annum. Using a limit of 33% of gross household incomes to be spent on rent/ mortgages, affordable housing comprises <u>884 dwellings per annum (19,448 homes over the Plan period) or 46% of that need. This increases to over 50% when taking account of wider London's affordable needs when applying these to the additional homes Brent is required to provide as set out in the London Plan.</u> This does not include people who currently live in private rented housing who are receiving housing benefit to make their rents affordable; technically the market can provide for their needs. A desire to reduce benefit dependency, particularly of those who work arguably would mean real affordable needs are higher. Of the affordable need, 85% was for social rent (council house type rents) and 10% was for London Living Rent (pegged at a % of median incomes). 5% was for people able to afford between that and 80% of median local rents; typically these people might seek to buy shared ownership homes.</p>	To clarify the number of affordable dwellings need identified in the Strategic Housing Market Assessment and percentage when taking account of wider London needs.
	6.2 Housing	6.2.15, page 284	<p><i>Amend para 6.2.15 to read:</i></p> <p>Typically, around 260 new homes per year have been delivered on small sites (defined as sites less than 25 dwellings or 2,500 sqm <u>0.25 hectares</u> in the London Plan). The Mayor considers that there is large potential in increasing numbers, identifying outer London boroughs as the principal locations. The London Plan identifies a</p>	Consistency with London Plan and reflects Council's acceptance of London Plan methodology rather than West London evidence base as the basis for

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			target of 1,023 433 dwellings for Brent through this source. Historic levels of delivery with policies that were generally supportive of small site delivery show this to be extremely indicate this will be a challenging <u>target</u> . The council's evidence indicates that an average target of 373 dwellings over the first 10 years of the Plan is more realistic with 469 dwellings per annum from 2029/30.	identifying small site windfall allowance.
MM97	6.2 Housing	Policy BH1 Page 287	<p><i>Amend Policy to:</i></p> <p>The council will maximise the opportunities to provide additional homes in the period to 2041 and beyond. To achieve this it will grant planning permission to support the delivery of the Growth Areas, site allocations and appropriate windfall sites to provide a minimum 27,482 23,250 homes in the period 2019/20-2028/29. It will positively plan to promote a further minimum of 18,074 homes from 2029/30 to the end of the Plan period in 2041 and a minimum of 46,018 homes in the period 2019/20-2040/41. Delivery will be assessed against Appendix 3 Housing Delivery Trajectory Annual Housing Requirement.</p> <p>In doing so it will take into account the likely need to continue to plan for new homes beyond each of these periods, ensuring that master planning and planning permissions take account of and positively plan for the potential for adjacent and sites in the wider area to come forward in the future to create successful places and mixed use communities.</p>	To reflect policy covers the Plan period and not beyond, the updated housing trajectory and retitle of Appendix 3.
MM98	6.2 Housing	BH2, page 288	<i>Amend policy to read:</i>	Consistency with London Plan and provide clarity on status of existing

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			<p>In addition to the Growth Areas and Site Allocations identified in this Plan, town centres, edge of town centre sites, <u>areas with higher levels of public transport accessibility levels</u> and intensification corridors will be priority locations where the provision of additional homes will be supported.</p> <p>Within town centres, edge of town centre sites and intensification corridors where existing non-residential floorspace forms part of a site proposed for residential development, the Council will require re-provision of the same amount and use class of non-residential floorspace. Exceptions to this will be where it can be shown that:</p> <ul style="list-style-type: none"> a) <u>the site is allocated or has planning permission for an alternative use(s);</u> b) there is no need for it or reasonable prospect of its use if provided; or c) in exceptional cases that its loss is outweighed by the benefits that its replacement with residential floorspace will bring. 	permissions within the policy.
MM99	6.2 Housing	BH3, page 290	<p><i>Add new sentence to the beginning of the policy to read:</i></p> <p><u>The provision of Build to Rent development as defined within London Plan Policy H11 will be supported within Brent.</u> To encourage increased housing delivery, within each Growth Areas (excluding South Kilburn) or development sites of 500 dwellings or more, the provision of Build to Rent properties will be expected unless this would:</p>	Clarity and consistency with the London Plan.

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MM100	6.2 Housing	BH4, page 291	<p><i>Amend policy to add new text to read:</i></p> <p>Planning Permission for Small Sites will be determined in accordance with London Plan Policy H2 with the exception of: Criterion D 2, which in Brent will only apply within PTAL 3-6 locations</p> <p><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></p> <p><u>a) the infill of vacant or underused brownfield sites,</u></p> <p><u>b) residential conversions, redevelopment, extensions of dwellings, or infill within the curtilage of a dwelling</u></p> <p><u>c) the redevelopment of flats, non-residential buildings and residential garages,</u></p> <p><u>d) 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. 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</u></p>	Revise 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><u>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><i>Amend policy justification to read:</i></p> <p>Justification</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. 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 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. 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 will be required. It sets a Brent 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.</p>	

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			<p>6.2.40 As an outer London borough Brent has comparatively high car dependency rates for journeys, 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 H2'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><u>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</u></p>	

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			<p><u>character over the Plan period. Whilst character will change, the Council will still expect high quality development.</u></p> <p>6.2.41 As such the council considers that London Plan Policy H2 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>6.2.41 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>6.2.41a 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 those areas, which as</u></p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>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>6.2.41bThe 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>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>LONDON PLAN</p> <p>Policy H2 Small sites</p> <p>Policy H2A Small Housing Developments</p> <p><u>Policy G5 Urban Greening</u></p> <p><u>Policy D7 Accessible Housing</u></p>	
MM101	6.2 Housing	BH5, page 292	<p><i>Amend policy to read:</i></p> <p>In Brent the strategic affordable housing target that will apply is 50% of new homes in the period to 2041. <u>London Plan Policy H5 Threshold Approach to Applications will be applied.</u> The affordable housing tenure split required to comply with London Plan Policy H56 Threshold Approach to Applications is for:</p> <p>Non-Build to Rent developments of 10 dwellings or more is:</p> <ul style="list-style-type: none"> a) 70 per cent Social Rent/ London Affordable Rent and; b) 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent, affordable rent within Local Housing Allowance limits and London Shared ownership. These must be for households within the most up to date income caps identified in the London Housing Strategy or London Plan Annual Monitoring Report. <p>Build to Rent developments, a minimum of, 100 per cent at London Living Rent <u>equivalent rents or lower.</u></p>	Clarity of alignment with London Plan, and grammar.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Developments of between 5-9 dwellings will be required to make a financial contribution for the provision of affordable housing off-site.	
MM102	6.2 Housing	6.2.49a, page 294	<p><i>Insert new para labelled 6.2.49a after 6.2.49 to read:</i></p> <p><u>6.2.49a In accordance with national policy and London Plan Policy H4, on major residential developments affordable housing should be provided on site, as part of the emphasis on creating mixed and balanced communities. Nevertheless, it might be that in exceptional circumstances financial contributions in lieu of provision of affordable housing on site will be acceptable. This is most likely to be the case for sites subject to late stage viability assessment reviews that due to the threshold approach will be subject to viability testing prior to and post planning permission. More detail on the when contributions in lieu of on-site provision will be acceptable and how they are calculated is set out in the Mayor's Housing SPG. On sites of between 5-9 dwellings it is recognised that on site provision is likely to be more challenging related to a number of issues, but particularly their attractiveness to registered providers to take on responsibility for ownership and management. As such, on these sites a financial contribution in lieu of on-site provision will be sought to support affordable housing provision elsewhere in the borough as set out in Policy BH5.</u></p>	Clarity on situations where financial contributions in lieu of on-site affordable housing occurs.
MM103	6.2 Housing	BH7, page 296	<p><i>Amend part f) and part g) of the policy to read:</i></p> <p>e) includes management arrangements agreed with the council suitable to its proposed use and size to not unacceptably impact on neighbour amenity;</p>	Clarity.

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			<p>f) demonstrates that there is a specific Brent need, or in the case of education <u>purpose built student accommodation</u> a London need, for the particular use; and</p> <p>g) will not lead to an over-concentration of the type of accommodation in the area. For Houses in Multiple Occupation this <u>an over-concentration</u> is defined as <u>where no more than 4 of 11 adjacent three or more of the ten nearest properties are Houses in Multiple Occupation.</u></p>	
MM104	6.2 Housing	BH8, page 299	<p><i>Amend policy to read:</i></p> <p>To support achieving the London Plan annual benchmark monitoring provision target <u>figure</u> of 230 dwellings per annum the council will require minimum provision of specialist older people's accommodation in the following circumstances:</p> <p>a) Within all Growth Areas except South Kilburn developers will be expected to work together to identify sites on which as a minimum 10% of all the Growth Area's additional dwellings over those which already have planning permission will be delivered as specialist older people's accommodation;</p> <p>h) Elsewhere, <u>as a minimum 10% on</u> sites with a capacity of 500 or more dwellings.</p>	Consistency with London Plan terminology and reflects criterion a) of the same supported by viability assessment.
MM105	6.2 Housing	BH9, page 300	<p><i>Amend policy to read:</i></p> <p>The existing Lynton Close travellers' site will be retained <u>and reconfigured to maximise the number of pitches available, as</u></p>	Consistency with London Plan, National Planning Practice Guidance, incorporates Secretary of State directions, takes

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>well as being brought up to a standard that allows for it to meet its existing residents' needs</u> unless evidence shows it is no longer needed.</p> <p>The Council will seek to accommodate the identified needs for any additional pitches in it's the latest <u>available gypsy and travellers needs</u> study that is consistent with the most up to date national or adopted London Plan definition of Gypsy and Travellers and associated needs assessment methodology.</p> <p>Within Growth Areas (except South Kilburn) and developments of 1 hectare or more that will include new homes, the potential for the incorporation of a dedicated Gypsy and Travellers' site/s should be robustly considered as part of any required masterplanning/site design evolution process. If it is evidenced that a more traditional format of site cannot be incorporated, then more innovative ways of accommodating needs should also be shown to have been considered.</p> <p><u>Any new</u> Proposals for Ggypsy and Ttravellers' sites should:</p> <ul style="list-style-type: none"> c) Meet a Brent derived need for such accommodation; i) Be located on a site and in an area both environmentally acceptable for residential occupation <u>forming part of a balanced and mixed community</u>, and suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity; j) Have acceptable accessibility by road users and pedestrians and to local services and public transport; and 	<p>account of needs and a site audit which has identified needs for improvements to Lynton Close and potential on site solutions for additional pitches to accommodate residents, plus the on-going engagement with existing Lynton Close occupiers on the choices available to them.</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>k) Be laid out and incorporate boundary treatments that seek to positively integrate with the adjacent townscape/communities.</p> <p><i>Amend policy justification to read:</i></p> <p>Justification</p> <p>6.2.79 Brent currently has 30 <u>31</u> formal pitches of accommodation located on the Lynton Road Close site of approximately 1 hectare which historically has had problems of over-crowding. A West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment was undertaken in 2018 <u>consistent with national policy and guidance related to identifying needs.</u> Using the draft London Plan definition of a Gypsy or Traveller, a minimum of an additional 90 pitches would be required. This is very different to the results in the same assessment generated for the national definition. This indicated a need for no additional pitches. Existing residents of Lynton Road Close although living in caravans did not fall within the current national definition of Gypsies and Travellers for planning purposes. Clarity will be provided on adoption of the London Plan which is the most appropriate. <u>The Council brought Lynton Close back under its management in 2017 and subsequently undertook an audit of the site. This clarified that the site is over-occupied and that the on-site facilities are inadequate for the number of occupants and in any case need updating to bring the site up to a satisfactory standard. The Council has resolved to</u></p>	

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			<p><u>address both these issues. It is working with the site's occupants to find a solution for those legitimately on site. Ultimately it will be for the community working closely with the Council to decide what is appropriate for them. If the outcome of this process is that a new site is necessary to accommodate needs, then any proposed site should be consistent with the criteria set out in the policy.</u></p> <p>6.2.80 Assuming traditional accommodation density levels the 90 additional pitches would indicate the need for nearly three hectares of land. For management purposes, this could be three or more sites, depending on their size. Realistically the only land that could accommodate this size of need will be that currently in non-residential use which through redevelopment could provide an acceptable residential environment.</p> <p>6.2.81 Due to the need to accommodate an increased population with associated social infrastructure, many Local Plan policies require replacement of existing residential and non-residential uses. This and the value of land realistically plays a significant role in limiting opportunities for delivery of single use travellers' sites. The 2018 assessment identifies that those in need are unlikely to be in a position to purchase/ develop a site. As such the best opportunities for delivering additional provision are likely to be in areas that will be subject to wholesale regeneration for a range of uses where residential is also appropriate. This includes Growth Areas, or larger development site allocations/ windfall sites that come forward for development incorporating new homes.</p>	

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			<p>6.2.82 In order to give a greater likelihood to delivery of Gypsy/ Traveller pitches sites, the council will require robust consideration of their incorporation as part of any large development where a development proposes new homes. This includes in the masterplanning of Growth Areas, or large scale sites of 1 hectare or more. The exception is South Kilburn Growth Area where a masterplanning exercise related to the need to rehouse a significant number of existing tenants in social rent properties has already identified maximum development potential.</p> <p>6.2.83 The scarcity of development land in Brent means that it has to be used efficiently. This is likely to mean that the low density/ intensity models previously used for Gypsy/ Travellers' will be extremely challenging if not impossible to deliver. As with other uses such as schools, health centres or supermarkets, suitable sites may well only come about as part of wider, potentially vertically mixed used developments. Therefore, consideration needs to be given to innovative ways of accommodating Gypsy/ Traveller sites within these types of developments.</p> <p>6.2.84 <u>Any new proposed Gypsy and Traveller sites will need to provide a safe and acceptable potential living environment; essentially consistent with the characteristics expected of mainstream housing and ideally forming part of a wider balanced and mixed residential community.</u> This includes having good access to social infrastructure to help address recognised disadvantages in relation to educational attainment and health/ life expectancy that this group has. Nevertheless, there should also be consideration of particular needs such as ability of work vehicles and homes</p>	

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			to access the main road network and facilities that support employment. The council aims to further Brent's reputation as a place that welcomes diversity. Therefore, the design and layout of G ypsy and T ravellers' sites, particularly at their edges, should look to integrate well with its surroundings and promote opportunities for positive interaction <u>with the adjacent townscape and associated communities.</u>	
MM106	6.2 Housing	BH13, page 306	All new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This is normally expected to be 20sqm per flat and 50sqm <u>per home</u> for family housing (including ground floor flats) <u>(3 bedrooms or more) situated at ground floor level and 20 sqm for all other housing.</u>	Clarity and reflective of denser developments coming in the borough.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM107	6.4 Economy and Town Centres	BE1, page 315	<i>Amend policy and add new paragraph to the policy to read:</i> The Granville multi-purpose workspace and community space in South Kilburn Growth Area will be protected and opportunities to provide additional affordable workspace will be sought. In Alperton, Burnt Oak Colindale, Church End, Neasden, Staples Corner and Wembley Growth Areas a minimum of 10% of total <u>employment</u> floorspace within major developments exceeding 3000 sq.m <u>of employment floorspace</u> is to be affordable <u>research and development, light</u>	Provides consistency between policy contents and policy justification, reflects changes to Use Classes, clarifies that the requirement for new affordable workspace provision only applies

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification								
			<p>industrial and studio workspace in the B use class <u>which will be protected by condition and / or legal agreement, where appropriate to do so.</u></p> <p><u>New affordable workspace should normally be provided on-site for the lifetime of the development and managed by an approved provider. Only in exceptional circumstances where it can be demonstrated robustly that this is not appropriate, may it be provided off-site. A financial contribution in lieu of on-site provision will only be accepted where this would have demonstrable benefits in furthering affordable workspace in the borough.</u></p> <p><u>Further and higher Educational provision</u> quarters at Northwick Park and Wembley will be protected and enhanced.</p>	to employment floorspace.								
MM108	6.4 Economy and Town Centres	BE2, page 317	<p><i>Amend first part of the policy to read:</i></p> <p><u>The Council is committed to exceeding the additional 0.6 hectares equivalent of industrial floorspace need within the plan period.</u> Within SIL and LSIS, <u>as shown on the Borough Policies Map,</u> development will be supported where it intensifies employment <u>industrial</u> uses, <u>including those for waste, utilities and transport infrastructure</u> and accords with the <u>following</u> principles: as follows <i>Amend table to read:</i></p> <table><tr><th>Employment Site<u>Industrial</u></th><th>Designation</th><th>Policy approach</th></tr><tr><td>East Lane</td><td>SIL</td><td rowspan="2">Intensification These sites will be protected for solely <u>industrial uses as defined</u></td></tr><tr><td>Northfields (<u>east and west of Grand Union Canal</u>)</td><td>SIL</td></tr></table>	Employment Site <u>Industrial</u>	Designation	Policy approach	East Lane	SIL	Intensification These sites will be protected for solely <u>industrial uses as defined</u>	Northfields (<u>east and west of Grand Union Canal</u>)	SIL	For brevity, clarity of location, consistency with target of London Plan and local evidence base and industrial emphasis.
Employment Site <u>Industrial</u>	Designation	Policy approach										
East Lane	SIL	Intensification These sites will be protected for solely <u>industrial uses as defined</u>										
Northfields (<u>east and west of Grand Union Canal</u>)	SIL											

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification
			Wembley	SIL	<u>in London Plan Policy E4 ‘Land for industry, logistics and services to support London’s economic function’ Criterion A.</u> 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 for start-up and space, move on space. Any loss or reduction in floorspace will be resisted.	
			Alperton (central)	LSIS		
			Alperton (south)	LSIS		
			Brentfield Road	LSIS		
			Kingsbury	LSIS		
			Staples Corner	SIL	Intensification and some co-location <u>subject to the comprehensive masterplan approach as set out for LSIS below, including requirements a) to g).</u>	
			Alperton (north)	LSIS	On these sites intensification through co-location will be supported, subject to a comprehensive masterplan approach produced with or agreed by the council demonstrating the following will be achieved: a) Conformity with London Plan policy E7;	
			Church End	LSIS		
			Colindale	LSIS		
			Cricklewood	LSIS		
			Honeypot Lane (Lowther Road)	LSIS		
			Honeypot Lane (Westmorelane Road)	LSIS		
			Neasden Lane	LSIS		

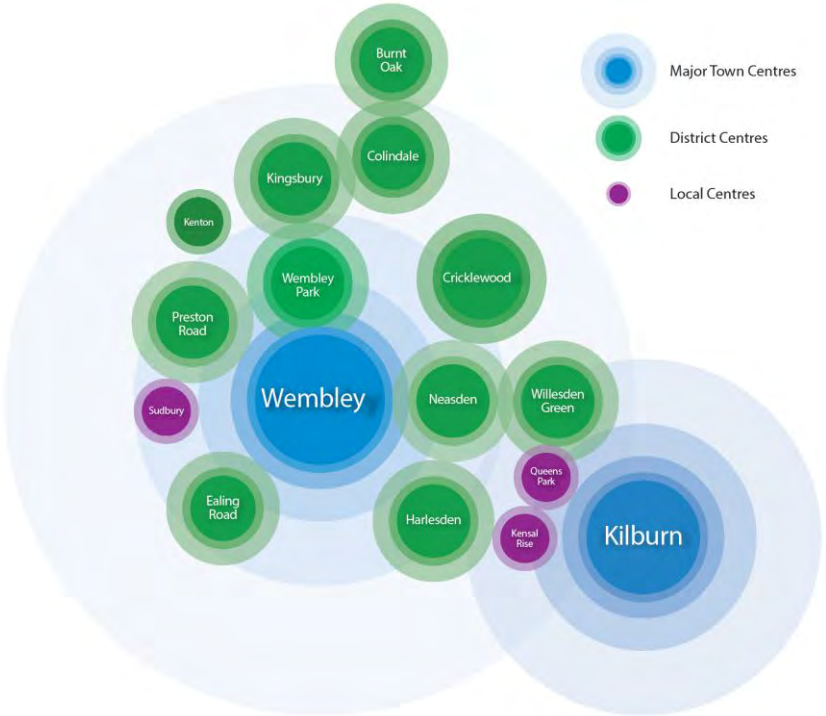
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification
					<p>b) a net increase in employment industrial floorspace <u>resulting in a minimum 0.65 plot ratio or the existing floorspace total, whichever is greater, across the masterplan area;</u></p> <p>c) a mix of B1(b) <u>research and development</u>, B1(c) <u>light industrial</u>, B2 <u>general industrial and B8-storage and distribution</u> employment floorspace will be delivered reflective of borough needs, including start-up space, <u>and</u> move on space;</p> <p>d) proactive engagement with existing businesses to seek to retain them on site where possible, and support for any businesses that cannot be incorporated to relocate off site;</p> <p>e) 10% of employment floorspace to be affordable workspace;</p> <p>f) the development is of a high quality design and will</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed			Reason for Modification
					<p>result in sustainable development, well served by community facilities and open space; and</p> <p>g) any potential conflicts between uses can be mitigated and a high standard of amenity achieved.</p>	
			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.	
MM109	6.4 Economy and Town Centres	BE3, page 319	<p><i>Amend and add new text to policy to read:</i></p> <p><u>Local Employment Sites have an important role to play in ensuring that a range of employment premises are available to meet employment needs, including ensuring the need for additional industrial floorspace capacity is met in the borough. The council will require their retention and where possible their use for research and development, light industrial, general industrial or storage and distribution will be intensified.</u> The Council will <u>only</u> allow the release development of Local Employment Sites to for 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></p>			Provide clarity about affordable workspace provision, industrial space and acceptable forms of development.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>affordable studio, research and development, light industrial or general industrial workspace in the B use class, with maker space in light industrial use class B1(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> <p><u>Where criterion b) applies, if within the existing or emerging creative clusters of Harlesden, Wembley Growth Area, Willesden Green, Alperton Growth Area, Kilburn, Kensal Green, Neasden, Queen's Park, Burnt Oak Colindale Growth Area, and Church End Growth Area, affordable workspace is to be provided on-site. Elsewhere, if affordable workspace is considered unlikely to successful, financial contributions will be secured to provide equivalent affordable workspace elsewhere.</u></p> <p>Work-Live units will be acceptable where they are managed by an organisation committed to their use primarily for employment, as evidenced by a management plan. Loss of Work-Live units to residential will be resisted.</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
	6.4 Economy and Town Centres	6.4.21 page 319	Local Employment Sites are sites outside of SIL and LSIS in employment use within the B use class and 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.</u> They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy allows for the release of unviable employment floorspace or, where appropriate, mixed-use development. This is consistent with the NPPF which requires the efficient use of land.	For clarification and consistency with policy wording
		6.4.26	Work-Live is the combination of living accommodation (Use Class C3) with workspace (Not Use Class B1 , but not B2 or B8) within a single self-contained unit.	To reflect the changes to the Use Classes Order
MM110	6.4 Economy and Town Centres	BE4, page 320	<p><i>Amend policy title to read:</i></p> <p>POLICY BE4: SUPPORTING STRONG CENTRES DIVERSITY OF USES</p> <p><i>Add title 'Diversity of uses' and amend part of that policy to read:</i></p> <p><u>DIVERSITY OF USES</u></p> <p>No further A4drinking establishments or A5takeaway uses will be permitted within the defined Primary Shopping Frontage of Brent's town centres, as shown on the Policies Map.</p>	Reflect changes to the Use Classes Order, identify designation of secondary frontage, include reference to supporting text within policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Non-A1 or A2 uses will be permitted within town centres where:</p> <ul style="list-style-type: none"> a) they would not reduce the proportion of frontage in A1 and A2 use to less than 65% of the primary frontage; or b) if vacancy rates exceed 10% of primary frontage it would not reduce the proportion of frontage in A1 and A2 use to less than 50%; and c) the proposal provides, or maintains, an active frontage. <p>Unviable secondary frontage, as shown on the policies map, on the periphery of town centres will be promoted for workspace, social infrastructure and residential uses. <u>Viability will be determined in accordance with the marketing requirements set out in paragraph 6.4.33.</u></p>	
MM111	6.4 Economy and Town Centres	FIGURE 34 Town Centre hierarchy, page 321	<i>Replace amended figure:</i>	For accuracy of town centre hierarchy in line with London Plan

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
				
MM112	6.4 Economy and Town Centres	BE5, page 323	<p><i>Amend part of the policy 'Takeaways' to read:</i></p> <p>Subject to other policies within the development plan, takeaways will be approved except where they would result in:</p>	Reflect changes to the Use Class Order, return to previous Plan position as more suitable borough-wide

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<ul style="list-style-type: none"> d) The introduction of any new A5takeaway use within the designated primary frontage of a town centre; e) an A5 usetakeaway within 400 metres walking distance of a primary school, secondary school or further education establishment entrance/ exit point; f) more than 6% of the units within a town centre frontage in A5 uses being takeaways; g) more than 1 unit or 15% of the units within a neighbourhood parade, whichever is the greater, in A5 use being takeaways; h) less than threetwo non-A5takeaway units between takeaways; or i) on-street parking in front of the premises creating highway safety problems. 	approach in response to discussions with town centre managers.
MM113	6.4 Economy and Town Centres	BE6, page 324	<p><i>Amend first part of the policy to read:</i></p> <p>Loss of A1, A2, A3retail, commercial, business and service uses or launderettes in neighbourhood parades or isolated shop units outside designated town centres will be permitted where the proposal does not result in a harmful break in the continuity of retail frontages, and the parade or unit is within 400 metres of equivalent alternative provision and;</p> <ul style="list-style-type: none"> a) is unviable; or b) the proposal will provide a community facility for which there is a demonstrable need. 	Reflect changes to the Use Class Order.
MM114	6.4 Economy & Town Centres	After 6.4.60, page 328	<p><i>Add new para 6.4.60a after 6.4.60 to read:</i></p> <p><u>6.4.60a When assessing criterion a) significant compromise will relate to the number of dwellings proposed by the applicant, against the likely</u></p>	To provide greater clarity to the policy wording used.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>reduction on the indicative capacity of the site allocation. An assessment of significance will be done on a case-by-case basis. In particular, it will take into consideration performance against the 5-year land supply requirement. It will also assess the extent to which visitor accommodation has already been permitted against the London Plan requirement of 2,622 bedrooms by 2040. The Council might consider that if performance against the housing requirement is healthy, that a greater component of the allocation coming forward as hotel, is appropriate, even if this reduces housing delivery below the indicative allocation target."</u>	

modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM115	6.5 Heritage and Culture	BHC1, page 333	<p><i>Amend policy and add new part e) to read:</i></p> <p>Proposals for or affecting heritage assets should:</p> <ul style="list-style-type: none"> a) demonstrate a clear understanding of the archaeological, architectural or historic significance and its wider context; b) provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the development on the heritage asset and its context as well as any public benefit; c) retain buildings, structures, architectural features, hard landscaping and spaces and archaeological remains, where their loss would cause harm <u>c</u> d) sustain and or enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the street scene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating; 	To provide a more consistent approach with national policy and reworded for clarity.

modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>d e) contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation;</p> <p>e) <u>seek to avoid harm in the first instance. Substantial harm or loss should be exceptional, especially where the asset is of high significance. Any proposed harm to or loss of a heritage asset (including to its setting) should require clear and convincing justification and can be outweighed by material planning considerations in the form of public benefits but only if these are sufficiently powerful.</u></p> <p>f) where demolition is proposed within a conservation area detailed plans for any replacement building will be required to allow consideration of whether the replacement would contribute positively to the character or will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures appearance of the area. In cases where demolition is permitted conditions and/or legal agreements will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures.</p>	
MM116	6.5 Heritage and Culture	6.5.24 page 336	<p><u>In the first instance,</u> The council will resist significant harm to or loss of to <u>designated</u> heritage assets. It will assess proposals which would directly or indirectly impact on heritage assets in the light of their significance and the degree of harm or loss which would be caused. Where the harm <u>is considered to be</u> would be less than substantial, it will be weighed against any public benefits of the proposal, including securing optimum viable use of the heritage asset and whether it would enhance or better reveal the <u>its</u> significance of the conservation area. For demolition or alteration to be approved, there will need to be clarity about what will be put in its place within a suitable time frame. It should be noted</p>	Additional wording to supporting text for clarity

modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			designation as a Locally Listed Building does not provide further statutory protection but it draws attention to the special qualities of the building.	
MM117	6.5 Heritage and Culture	BHC4, page 339	<p><i>Amend policy to read:</i></p> <p>The London Plan identifies the Night Time Economy of Wembley of National/International Importance and Kilburn High Road, Cricklewood and Wembley Park as of more than local importance.</p> <p>The council through its own actions and working with others will support Brent's night time economy and in particular the four centres which will be the priority locations for such uses. Development that preserves or enhances existing night time economy activities or creates new ones that will reinforce the role and significance of each centre in the London hierarchy in an inclusive and accessible way will be supported, whilst that which would undermine it will be refused.</p> <p><u>Development impacting the night-time economy must preserve or enhance its function in line with the London Plan town centre hierarchy. This must accord with the principles of inclusivity and accessibility as laid out within the Mayor's Culture and Night-Time Economy SPG.</u></p>	Reworded for clarity.
MM118	6.5 Heritage and Culture	BHC5, page 340	<p><i>Amend first paragraph of policy to read:</i></p> <p>The Council will support <u>recognises the important role that pubs can have in contributing to the borough's character and their role as community assets. New public houses will be supported in town centres.</u> The loss of public houses only where <u>will only be supported where the following can be adequately demonstrated.</u></p> <p><i>Amend part a) to read:</i></p>	To have a more positive wording around the role of public houses and reworded for clarity and consistency with new Use Class.

modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			a) its continued use as a pub or as an alternative community facility within the D1 use class is not economically viable as demonstrated by meeting the marketing requirements as set out in paragraph 6.5.39;	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM119	6.6 Green Infrastructure and Natural Environment	BGI1, page 345	<p><i>Amend first part of policy to read:</i></p> <p>The council will expect the provision of additional public open space as set out in Growth Area policies.</p> <p>Major residential developments outside Growth Areas will be expected to provide 0.81 sqm of public open space per resident in the following manner: provision will be on-site will address current and future needs:</p> <ul style="list-style-type: none"> a) in the wards with a public open space deficiency of Alperton, Brondesbury Park, Dudden Hill, Harlesden, Kensal Green, Kilburn, Mapesbury, Queens Park, Queensbury, Tokyngton, Wembley and Willesden Green provision will be by-maximising the on-site provision of a range of publicly accessible open spaces for a range of users; b) In the rest of the borough, provision will be on-site unless the size and typology of space that the development generates a need for, with the exception of a Local Area of Play, is already within 400 metres by a direct and safe walking route. <p>Where public open space is not being provided on site, a financial contribution will be sought to improving the quality and/or accessibility of existing open space provision.</p>	<p>For clarity and to avoid repetition, the need for provision of public open space has been set out in all Growth Area policies.</p> <p>As such, based on the evidence-base (Open Space, Sports and Recreation Study) – there is adequate over-provision of open space compared to the national FIT standard, therefore the standard has been removed to only reflect the need in wards with deficiency based on accessibility/proximity</p>

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			The provision of 'meanwhile uses', such as pocket parks and community gardens on parts of sites that are likely to be otherwise vacant for long periods will be sought in association with development proposals.	that are not in the Growth Area boundaries.
MM120	6.6 Green Infrastructure and Natural Environment	BGI2, page 350	<p><i>Amend part b) of policy to read:</i></p> <p>b) In the case of major development to make provision for the planting and retention of trees on site. Where retention is agreed to not be possible, developers shall provide new trees to achieve equivalent canopy cover or a financial contribution for off-site tree planting of equivalent canopy cover will be sought. <u>Replacement canopy cover will be measured as total canopy area of new trees at time of planting being equal to canopy area of existing mature trees proposed for removal.</u></p>	Clarity and better explanation of requirement by the Council
MM121	6.7 Sustainable Infrastructure	BSUI3, page 361	<p><i>Amend first paragraph of policy to read:</i></p> <p>Proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. <u>Proposed development must pass the sequential and exceptions test as required by national policy.</u> The design and layout of proposals requiring a Flood Risk Assessment <u>as set out in paragraph 6.7.37</u> must contribute to flood risk management and reduction and:</p> <p><i>Amend last paragraph of policy to read:</i></p>	Reference the need for sequential test on flooding as sought by Environment Agency and provide clarity by reference to paragraph that sets out when a FRA will be required. To also provide a positive policy approach to

			<p>Opportunities will be sought from the redevelopment of sites in functional floodplain (flood zone 3b) to restore the natural function and storage capacity of the floodplain. Proposals that result in an increase involve the loss of functional floodplain or otherwise would constrain its in natural function, by impeding flow or reducing flood storage capacity and the environmental quality of the watercourse, will be encouraged resisted.</p>	encouraging development related to positive impacts on flood storage and environmental quality.
MM122	Sustainable Infrastructure	6.7.35, page 362	<p><i>Add new para 6.7.35a) after para 6.7.35 to read:</i></p> <p><u>6.7.35 a) The Plan's site allocations and intensification corridors have been considered to be acceptable in principle taking account of the recommendations of the Brent Strategic Flood Risk Assessment Level 2 August 2020 (SFRA2) and the Brent Flood Risk Sequential and Exceptions Test September 2020. Applications for their development must be consistent with the recommendations of the SFRA2 and supported with an appropriate FRA that shows that the development does not unacceptably increase flood risk on or off site.</u></p> <p><i>Add new para 6.7.35b) to read:</i></p> <p><u>6.7.35b) The Council will only consider the redevelopment of sites in functional floodplain to occur within the already identified site allocations and intensification corridors that have been supported by a Level 2 SFRA and Sequential Test. When applying this policy the guidance in the West London SFRA (2018) specifically Sections 3.11.1 and 3.11.2 must be adhered to, so that it is clear which parts of the site are developable and which areas of the site should remain for flood storage (i.e. functional floodplain). The compatibility of development vulnerability classifications for Flood Zones 3a and 3b set out in the Planning Practice Guidance will</u></p>	Supporting text for development on floodplain to provide clarity to support policy consistent with the evidence base and national policy.

			<p><u>apply. The policy is specific about the improvements that will be sought such as restoring natural function and storage capacity of the floodplain. The Council will also seek to improve the environmental quality of any watercourse on these sites. The high level of flood risk warrants very careful consideration of design, mitigation and overall environmental improvement, taking into account climate change, and early discussions with the Environment Agency are recommended.</u></p>	
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Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM123	6.8 Transport	BT1, page 370	<p><i>Amend 'Active Travel' part c) to read:</i></p> <p>c) provide for and make contributions towards connected, high quality, convenient and safe cycle routes and facilities in accordance with the Brent Cycling Strategy, including cycle parking, in line with or exceeding London Plan standards and TfL and WestTrans design standards, the implementation of new cycleways, and a borough wide cycle hire scheme;</p> <p><i>Amend part k) to read:</i></p> <p>Clean Technology</p> <p>k) <u>support the bus network in Brent by identifying and implementing bus priority measures to</u> improve coverage and journey time reliability; <u>maintaining existing coverage and improving connectivity to areas of the borough with limited public transport access,</u> of the bus network and enable and improving <u>bus</u> interchange facilities;</p> <p><i>Insert title before part l) to read:</i></p>	Clarity on standards that will apply, support for bus network; also, title moved down as that point should be part of 'sustainable travel' not 'clean technology'

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Clean Technology</p> <p>l) increase coverage of Electric Vehicle charging points across the borough.</p>	
MM124	6.8 Transport	Policy BT2, page 373	<p><i>Amend first paragraph of the policy to read:</i></p> <p>Developments should provide parking consistent with parking standards in Appendix 4. Car parking standards are the maximum and car free development will be encouraged where an existing Controlled Parking Zone (CPZ) is in place or can be achieved. <u>should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking.</u></p> <p>Contributions secured through a planning obligation to existing and new car clubs, bike clubs and pool car and bike schemes in the borough will be strongly encouraged in place of private parking in developments.</p>	To ensure policy accords with London Plan policy T6- Car Parking
MM125	6.8 Transport	BT3, page 376	<p><i>Amend part of the policy to read:</i></p> <p>PROVISION AND PROTECTION OF FREIGHT FACILITIES</p> <p>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</u> the use of more sustainable alternatives, i.e. by rail and canal, <u>and pursuit of best practice in technical innovation to consolidate delivery and construction transport</u> is encouraged.</p>	Greater clarity on freight consolidation and protection of facilities.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>For longer distance movements, the provision of sidings within suitable new developments adjoining railway lines is supported. Warehousing development, adjoining rail lines where rail access can be provided, should include sidings.</p> <p>Existing sidings and sites adjacent to them or the canal with the potential for rail freight use will be protected where these are adaptable to serve anticipated needs. <u>Development proposals which would conflict with the effective operation of these facilities will not be permitted unless:</u></p> <p><u>a) appropriate mitigation is provided to ensure it will not place unreasonable restrictions on the effective operation of these facilities; or</u></p> <p><u>b) the existing facility can be satisfactorily relocated within the development proposals in terms of operational requirements and environmental criteria; or</u></p> <p><u>c) the facility is replaced in an appropriate alternative location</u></p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM126	7 Delivery and Monitoring	7.1.20, page 384	<p><i>Add new sentences at the end of para 7.1.20 to read:</i></p> <p><u>Infrastructure delivery will also be monitored through the AMR and the Infrastructure Funding Statement, both of which are intended to be published on an annual basis. In addition, the Council has introduced formal governance arrangements for the spending of strategic CIL and S106. This will enable CIL to be allocated in a</u></p>	To provide greater clarity to monitoring arrangements for infrastructure delivery

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>transparent, consistent and accountable way that will help deliver key infrastructure priorities identified in the Local Plan, the Infrastructure Delivery Plan and the Council's capital programme.</u>	
MM127	7 Delivery and Monitoring	7.1.22, page 384	<p><i>Add new sentences at the end of para 7.1.22 to read:</i></p> <p>Monitoring is an important part of the continuous planning process. Changing circumstances means that the monitoring of policies is required to deliver, manage, and if necessary adapt or bring forward alternative planning approaches to Brent's growth and meeting the borough's needs for homes, jobs, services and infrastructure. <u>Monitoring of policies will be undertaken through the AMR and where targets are not being met, a review may be triggered. A review may also be triggered by a review of the London Plan or changes to national policy.</u></p>	To provide greater clarity to monitoring targets
	7 Delivery and Monitoring	Figure 39, page 385, (new targets – first and second measures):	<p>Performance Measure "<u>Proportion of Brent Local Super Output Areas in the 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>"</p> <p>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>"</p>	Improve monitoring of policy outcomes.
	7 Delivery and Monitoring	Figure 39, page 385	Performance Measure "Tall Buildings allowed inconsistent with policy" Target " None <u>Zero</u> " Specific Policy to be Monitored " BD1 <u>BD2</u> "	To correctly identify the target and policy
	7 Delivery and Monitoring	Figure 39, page 385	Performance Measure "Residential basements in existing properties allowed that are larger than policy criteria" Target " None <u>Zero</u> " Specific Policy to be Monitored " BD2 <u>BD3</u> "	To correctly identify the target and policy

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
	7 Delivery and Monitoring	Figure 39, page 385 (new measure)	Performance measure: " <u>Percentage of Build to Rent affordable housing to be London Living Rent tenure</u> " Target: " <u>100%</u> " Specific policy to be monitored: " <u>BH3</u> "	To improve monitoring of outcomes of policy BH3
	7 Delivery and Monitoring	Figure 39, page 385 (new measure)	Performance Measure " <u>Number of homes built on small sites.</u> " Target " <u>433 dwellings per annum</u> ". Specific policy to be monitored " <u>BH4</u> "	To provide greater clarity to monitoring of outcomes of policy BH4
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Tenure split of affordable housing within major development with an affordable housing planning obligation." Target " <u>70% social/ London affordable rent; below LHA rates 30% intermediate</u> ". Specific policy to be monitored "BH5"	To clarify monitoring of policy BH5
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Additional bed spaces built in communal establishments." Target " <u>No specified target</u> ". Specific policy to be monitored "BH7"	To provide clarification of monitoring target
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Net Number of Additional Gypsy and Traveller Pitches Provided." Target " <u>Consistent with accepted definition outcome of Lynton Close audit.</u> " Specific policy to be monitored "BH9"	To provide clarification of monitoring target
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Net number of dwellings lost where the development results in an overall loss of dwellings." Target " <u>No specified target. Reasons for any net loss of dwellings to be explored and clarified within the AMR.</u> " Specific policy to be monitored "BH10"	Clarification of target. To direct readers to further information / clarification on monitoring of target BH10

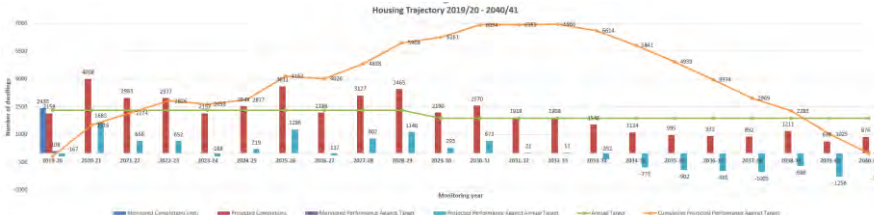
Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
	7 Delivery and Monitoring	Figure 39 , page 385	Performance measure: "Number of permissions where conversion of an existing 3 bed dwelling results in additional dwelling plus family accommodation." Target: ""No Target" <u>No net loss of family sized (3+ bedroom) accommodation."</u> Specific policy to be monitored "BH11"	To correctly identify target to monitor policy BH11
	7 Delivery and Monitoring	Figure 39 , page 385	Performance measure: "Amount of managed work space provided." Target: ""No Target" <u>10% of employment floorspace within major developments exceeding 3000sqm employment as affordable workspace"</u> Specific policy to be monitored "BE1"	To correctly identify target to monitor policy BE1
	7 Delivery and Monitoring	Figure 39 , page 385 (target for BE2)	Performance measure: "Net additional employment industrial floorspace provided in SIL and LSIS and LES by intensification or co-location" Target: "No <u>specified</u> target, but definitely no <u>net loss</u> " Specific policy to be monitored: "BE2 and BE3 "	To ensure effective monitoring of policy BE2
	7 Delivery and Monitoring	Figure 39 , page 385 (new separate line for BE3)	Performance measure: " <u>Net additional industrial floorspace provided in Local Employment Sites</u> " Target: " <u>No specified target. Reasons for any net loss of floorspace to be explored and clarified in the AMR</u> " Specific policy to be monitored: " <u>BE3</u> "	To ensure effective monitoring of policy BE3
	7 Delivery and Monitoring	Figure 39 , page 385	Performance measure: "Additional A4 or A5 <u>drinking establishments and hot food takeaway</u> units granted permission in Primary Shopping Frontages." Target: " None <u>Zero</u> " Specific policy to be monitored: "BE4"	To reflect change to Use Classes Order and more specific target (Policy BE4)
	7 Delivery and Monitoring	Figure 39 (removal of target), page 385	Performance measure: Proportion of primary frontage in A1 and A2 use. Target: Proportion of frontage in A1 and A2 use not to fall below 65%, or 50% if vacancy rates exceed 10%.	Removal of target to reflect change to Use Classes Order, and policy BE4

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Specific policy to be monitored: BE4	
	7 Delivery and Monitoring	Figure 39, page 385	Performance measure: "Concentration of takeaways and proximity of takeaways to <u>primary schools</u> , secondary schools and further education establishments." Target: "Proportion of units in use as takeaways in town centres not to exceed 6%, and no further takeaways within 400 metres or of a <u>primary school</u> , secondary school or further education establishment." Specific policy to be monitored: "BE5"	To accurately reflect policy BE5
	7 Delivery and Monitoring	Figure 39 page 386	Performance measure: "Number of public houses lost and not replaced by development." Target: "No <u>net</u> loss of viable public houses/ <u>drinking establishments</u> " Specific Policy to be measured: "BHC5"	To effectively monitor policy BHC5
	7 Delivery and Monitoring	Figure 39 page 386	Performance measure: "Loss of Category A Tree Preservation Order Trees." Target: " None <u>Zero</u> " Specific Policy to be measured: " BGI4 <u>BGI2</u> "	To correctly identify target and policy being monitored (BGI2)
	7 Delivery and Monitoring	Figure 39 page 386	Performance measure: "Change in Community Infrastructure Floorspace (Schools, Healthcare, Other Community Space, Cultural and Leisure Facilities)." Target: " None <u>Zero</u> " Specific Policy to be measured: "BSI1"	To correctly identify target (BSI2)
	7 Delivery and Monitoring	Figure 39	Performance measure: " <u>Number of new district heat networks in growth areas</u> " Target: " <u>No specified target</u> " Specific policy to be monitored: " <u>BSUI1</u> "	To effectively monitor policy BSUI1
	7 Delivery and Monitoring	Figure 39	Performance measure: " <u>Percentage of major developments delivered within Growth Areas and Air Quality Focus Areas that are air quality positive</u> "	To effectively monitor policy BSUI2

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Target: " <u>100%</u> " Specific policy to be monitored: " <u>BSUI2</u> "	
	7 Delivery and Monitoring	Figure 39	Performance measure: " <u>Percentage of major developments delivered outside of Growth Areas and Air Quality Focus Areas that are air quality neutral</u> " Target: " <u>100%</u> " Specific policy to be monitored: " <u>BSUI2</u> "	To effectively monitor policy BSUI2
	7 Delivery and Monitoring	Figure 39	Performance measure: " <u>Number of developments permissioned where the Environment Agency has outstanding advice that there has been failure to make appropriate provision for flood risk mitigation, or which would increase risk or consequence of flooding</u> " Target: " <u>Zero</u> " Specific policy to be monitored: " <u>BSUI3</u> "	To effectively monitor policy BSUI3

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MM128	Appendix 1	Page 388	<u>Delete Appendix 1 from the Plan</u>	Table in Appendix 1 no longer necessary
MM129	Appendix 3	Page 392	<u>Amend Appendix 3 and the table to read:</u> <u>BRENT LOCAL PLAN ANNUAL HOUSING REQUIREMENT-HOUSING DELIVERY TRAJECTORY</u> <u>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.</u>	To provide greater clarity on what the trajectory will be used for and updated to reflect estimated delivery based on knowledge of sites.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed						Reason for Modification
			Year	19/20-23/24	24/25-28/29	29/30-33/34	34/35-40/41	Total	
			Dwellings	15,080	12,402	11,514	6,560	45,554	
			Average Per Year Over Period	3,016	2,480	2,302	937	2,070	
			Year		19/20-28/29		29/30-40/41		
			Dwellings		27,482		18,074	45,554	
			Average Per Year Over Period		2,748		1,807	4,555	
			<u>Period</u>		<u>Housing Delivery Target Per Annum</u>				
			<u>First 5 years (2019/20 - 2023/24)</u>		<u>2,325</u>				
			<u>6-10 years (2024/25 - 2028/29)</u>		<u>2,325</u>				
			<u>Total First 10 years – consistent with London Plan 2021</u>		<u>23,250</u>				
			<u>11-15 years (2029/30 - 2033/34)</u>		<u>1,897</u>				
			<u>16-22 years (2034/35 - 2040/41)</u>		<u>1,897</u>				

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed		Reason for Modification				
			<table><tr><td>Total for the next 12 years</td><td>22,768</td></tr><tr><td>Whole plan period</td><td>46,018</td></tr></table> 		Total for the next 12 years	22,768	Whole plan period	46,018	
Total for the next 12 years	22,768								
Whole plan period	46,018								
MM130	Appendix 6	Strategic Policies in the new Brent Local Plan for the purposes of Neighbourhood Planning, page 396	<p><i>Amend table in Appendix 6 to read:</i></p> <p>Strategic Policies <u>DMP1, BP1, BCGA1, BP2, BEGA1, BEGA2, BP3, BNGA1, BP4, BNWGA1, BP5, BSGA1, BP6, BSEGA1, BP7, BSWGA1, BD1, BD2, BH1, BH2, BH3, BH4, BH5, BH6, BH7, BH8, BH9, BH10, BH11, BH12, BH13, BS11, BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8, BE9, BHC1, BHC2, BHC3, BHC4, BHC5, BGI1, BGI2, BSUI1, BSUI2, BSUI3, BT1, BT2, BT3, BT4</u></p> <p>STRATEGIC POLICIES: <u>All Place Policies: BP1, BP2, BP3, BP4, BP5, BP6, BP7</u> <u>All Growth Area Policies: BCGA1, BEGA1A, BEGA2A, BEGA1, BEGA2, BNGA1, BNWGA2A, BNWGA1, BSGA1, BSEGA1, BSWGA1</u> <u>All Site Allocation Policies: BCSA1-BCSA20, BESA1-BESA3, BNSA1-BNSA8, BNWSA1, BSSA1-BSSA19, BSESA1-BSESA35, BSWSA1-BSWSA17</u> <u>Other policies: BD1 Leading the Way in Good Urban Design</u> <u>BD2 Tall Buildings in Brent</u> <u>BH1 Increasing Housing Supply in Brent</u></p>		Clarification on which policies are strategic and which ones are non-strategic				

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>BH2 Priority Areas for Additional Housing Provision within Brent</u> <u>BH3 Build to Rent</u> <u>BH4 Small Sites and Small Housing Developments in Brent</u> <u>BH5 Affordable Housing</u> <u>BH6 Housing Size Mix</u> <u>BH7 Accommodation with Shared Facilities or Additional Support</u> <u>BH8 Specialist Older Persons Housing</u> <u>BH9 Gypsy and Traveller Accommodation</u> <u>BH10 Resisting Housing Loss</u> <u>BH11 Conversion of Family Sized Dwellings</u> <u>BSI1 Social Infrastructure and Community Facilities</u> <u>BE1 Economic Growth and Employment Opportunities for all</u> <u>BE2 Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)</u> <u>BE3 Local Employment Sites and Work-Live</u> <u>BE4 Supporting Strong Centres</u> <u>BE9 Visitor Accommodation and Attractions</u> <u>BHC1 Brent's Heritage Assets</u> <u>BHC2 National Stadium Wembley</u> <u>BHC3 Supporting Brent's Culture and Creative Industries</u> <u>BHC4 Brent's Night Time Economy</u> <u>BHC5 Public Houses</u> <u>BGI1 Green and Blue Infrastructure in Brent</u> <u>BGI2 Trees and Woodlands</u> <u>BSUI1 Creating a Resilient and Efficient Brent</u> <u>BSUI2 Air Quality</u> <u>BSUI3 Managing Flood Risk</u> <u>BSUI4 On-site Water Management and Surface Water Attenuation</u> <u>BT1 Sustainable Travel Choice</u> <u>BT2 Parking and Car Free Development</u>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>BT3 Freight and Servicing, Provision and Protection of Freight Facilities</u></p> <p><u>Non-Strategic Policies</u> BCSA1, BCSA2, BCSA3, BCSA4, BCSA5, BCSA6, BCSA7, BCSA8, BCSA9, BCSA10, BCSA11, BCSA12, BCSA13, BCSA14, BCSA15, BCSA16, BCSA17, BESA1, BESA2, BESA3, BNSA1, BNSA2, BNSA3, BNSA4, BNSA5, BNSA6, BNSA7, BNWSA1, BSSA1, BSSA1, BSSA2, BSSA3, BSSA4, BSSA5, BSSA6, BSSA7, BSSA8, BSSA9, BSSA10, BSSA11, BSSA12, BSSA13, BSSA14, BSSA15, BSSA16, BSSA17, BSSA18, BSSA19, BSESA1, BSESA2, BSESA3, BSESA4, BSESA5, BSESA6, BSESA7, BSESA8, BSESA9, BSESA10, BSESA11, BSESA12, BSESA13, BSESA14, BSESA15, BSESA16, BSESA17, BSESA18, BSESA19, BSESA20, BSESA21, BSESA22, BSESA23, BSESA24, BSESA25, BSESA26, BSESA27, BSESA28, BSESA29, BSESA30, BSESA31, BSESA32, BSESA33, BSESA34, BSWSA1, BSWSA1, BSWSA2, BSWSA3, BSWSA4, BSWSA5, BSWSA6, BSWSA7, BSWSA8, BSWSA9, BSWSA10, BSWSA11, BSWSA12, BSWSA13, BSWSA14, BSWSA15 and BSWSA16</p> <p><u>Non-Strategic Policies:</u> <u>DMP1 Development Management General Policy</u> <u>BD3 Basement development</u> <u>BH12 Residential Outbuildings</u> <u>BH13 Residential Amenity Space</u> <u>BE5 Protecting Retail in Town Centres, Betting Shops, Adult Gaming Centres and Pawnbrokers</u> <u>BE6 Neighbourhood Parades and Isolated Shop Units</u> <u>BE7 Shop Front Design and Forecourt Trading</u> <u>BE8 Markets and Car Boot Sales</u></p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>BT4 Forming an Access on to a Road</u>	
MM131	Glossary	Page 397-99	<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>	Clarification of term.
MM132	Glossary	Page 398, Locally Significant Industrial Sites (LSIS)	"Employment <u>Industrial</u> sites identified in the Core Strategy <u>Local Plan</u> as being of significance to Brent's economy."	Consistency with London Plan and update which Plan it is identified.
MM133	Glossary	Page 398	<u>Makerspace: Studio or light industrial workspace for creative industries. These businesses create social and economic value through events and places of interest, attracting visitors, enriching lives and highlighting diverse perspectives through the arts.</u>	To add clarity to the term 'makerspace'.

SCHEDULE OF ADDITIONAL NON-MAIN (MINOR) MODIFICATIONS OF DRAFT BRENT LOCAL PLAN SUBMITTED FOR EXAMINATION IN MARCH 2020
LONDON BOROUGH OF BRENT

This schedule contains all minor modifications to Brent Local Plan submission version.

All proposed modifications and their reference numbers supersede all previous versions proposed by the Council during the examination process.

The following format has been used to denote the modifications:

~~Strikethrough text~~ = text proposed for removal compared to submission version

Underline text = new text proposed for justification text compared to submission version

Minor Modifications

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM1	3 Brent Characteristics	3.10, pg. 18	<p><i>Amend last sentence of para 3.10 to read:</i></p> <p>The extent of the challenge of these competing centres is such that despite the opening of the extensive London Designer Outlet in 2015, Wembley's market share of Brent residents' spend has continued <u>to</u> decline over the last decade.</p>	Grammar
MiM2	3 Brent Characteristics	3.12, pg.19	<p><i>Amend fifth sentence of para 3.12 to read:</i></p> <p>Increases in <u>the</u> number of homes and the amount of employment floorspace required to meet future population <u>growth</u> will mean that this trend will need to be continued.</p>	Grammar
MiM3	3 Brent Characteristics	3.13, pg.19	<p><i>Amend second sentence of para 3.13 to read:</i></p> <p>London Plan targets now requires Brent to provide 29,150-23,250 new homes from 2019/20 to 2028/29. This is equivalent to one new home being built for every 4 <u>five</u> that exist currently.</p>	Consistency with London Plan and factual. For clarity the 4 has been struck out but may not show due to formatting.
MiM4	3 Brent Characteristics	3.18, pg.20	<p><i>Amend third sentence of para 3.18 to read:</i></p> <p>As such there is a need to provide further education for the working-age residents to help uplift to the economic base of the borough.</p>	Grammar

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM5	3 Brent Characteristics	3.20, pg.21	<p><i>Amend fourth sentence of para 3.20 to read:</i></p> <p>This will be through a number of changes, including: local hospitals offering a range of out of hospital services; hubs/health centres offering a range of services; and networks of care, formed of GP practices enhancing the capacity of primary care to delivery out of hospital services.</p>	Grammar
MiM6	3 Brent Characteristics	3.22, pg.22	<p><i>Amend fourth of para 3.22 to read:</i></p> <p>The exception to this in terms of new provision is at Wembley Park where new high grade offices have or are being been built.</p>	Grammar
MiM7	3 Brent Characteristics	3.23, pg.22	<p><i>Amend fifth sentence of para 3.23 to read:</i></p> <p>At a West London level, due to predicted demand, the Greater London Authority has identified that Brent should 'provide capacity' for <u>there is a need for additional industrial floorspace, particularly that for storage and distribution purpose and some of this is within Brent.</u></p> <p><i>Amend part a) of para 3.23 to read:</i></p> <p>The challenges are to:</p> <ul style="list-style-type: none"> a) better meet Brent's shopping needs locally within the borough by improving town centres, but facing market realities 	Reflects Secretary of States direction to modify the London Plan and evidence base. Also removes repetition with similar wording in paragraph 3.10c)

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>such as recognise and adapt to likely impacts of on-line retailing and recognising managed reductions in the size of some centres will undoubtedly be necessary;</p> <p>b) retain or deliver lower cost office/ employment premises to assist small business creation/ development;</p>	
MiM8	3 Brent Characteristics	3.28, pg.24	<p><i>Insert new footnote in para 3.28:</i></p> <p>As with the provision of indoor sports facilities¹⁷, for a borough that hosts the National Stadium, the provision of outdoor sports facilities¹⁸ to which there is access by the general public is weaker than it should be. Improvements are needed for the provision of football pitches and tennis courts.</p> <p><i>Insert footnote reference at end of page 24 for para 3.28:</i></p> <p>¹⁷<u>Brent Council Indoor Sports and Leisure Facilities Needs Assessment November 2018</u></p> <p>¹⁸<u>A Strategic Approach to Playing Provision in Brent December 2016</u></p>	To provide better referencing.
MiM9	3 Brent Characteristics	3.33, pg.25	<i>Amend first two sentences of para 3.33 to read:</i>	Factual.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			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 <u>2</u>) and potentially the West London Orbital with an additional stations at <u>Harlesden and</u> Neasden (2026). These will increase public transport accessibility and use and provide focal points for development in the adjacent areas.	
MiM10	4 Development Vision and Good Growth in Brent	4.3, pg.30	<i>Amend para number and last sentence of para to read:</i> <u>4.3</u> 4.39 In considering the appropriateness of developments a number of factors as outlined in the policy may be applicable, whilst for some, relatively few will apply. A number of the criteria are inter-related. For each criterion there is also likely to be more specific policy considerations in the NPPF and associated Planning Practice Guidance, the London Plan <u>with associated Supplementary Planning Guidance</u> and the Brent Local Plan.	Recognises extent of additional material produced by the Mayor to support London Plan policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM11	5.1 Central Place	Challenges table, pg.43	<i>Amend point to read:</i> <ul style="list-style-type: none"> East-west travel during events faces significant delays this will need to be further addressed by 	Clarity pedway meaning.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			the proposed removal of the <u>pedestrian ramp (pedway)</u> leading up to Wembley Stadium	
MiM12	5.1 Central Place	Figure 9, pg.40	<i>Amend caption to read:</i> Figure 9 High Level Plan of the Place Vision. <u>More detailed boundaries can be seen on the Policies Map</u>	Clarification to user that the policies map will provide more clarity on individual policies boundaries.
MiM13	5.1 Central Place	5.1.17, pg.41	<i>Amend last sentence of para 5.1.17 to read:</i> A variety of uses will be introduced to the east of the national stadium to provide a transition from the residential and commercial space around the London Designer Outlet through to the Strategic Industrial Locations further east. The wider Strategic Industrial Location will be protected and where possible intensified <u>for industrial uses</u> , whilst its longer term future, particularly its western edge as an employment led extension of the high density mixed use Wembley Park typology post 2041, will be considered in more detail for development post 2029.	Clarity on use of SIL and removal of reference to beyond the Plan period.
MiM14	5.1 Central Place	Vision, 5.1.18 ,pg.44	<i>Amend para 5.1.18 to read:</i> New development will build on the cultural heritage of the national stadium and the SSE Arena while the historic Barn Hill neighbourhood will be protected to preserve and ideally enhance its identity, creating a place where the new and existing parts of Wembley interface with	Removes events lost to Covid.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			one another. Wembley national stadium's use as a venue for the final of Euro 2020 and Brent's status as London Borough of Culture 2020, with its associated legacy opportunities, will be an integral part of improving the place for the future.	
MiM15	(left blank)			
MiM16	5.1 Central Place	5.1.21-5.1.23, pg.46	<p><i>Amend 'Homes' para 5.1.21, para 5.1.22 and para 5.1.23 to read:</i></p> <p>Homes</p> <p>5.1.21 Wembley has seen significant investment, especially around the stadium where the developer Quintain is the main landowner and are taking forward the Wembley masterplan. Development has been at greater densities than envisaged in the 2010 Core Strategy. This, plus the identification of additional sites will increase the Growth Area's potential additional residential capacity to a minimum additional 15,000 homes by 2041.</p> <p>5.1.22 Land along First Way and Watkin Road has previously been allocated for non-industrial development. These sites still provide that an opportunity, but at higher densities than previously identified in the 2010 Core Strategy, whilst also high density residential incorporating on lower floors more employment industrial</p>	For brevity and clarity make consistent with London Plan and Local Plan (Policy BE3). Reflects Secretary of State's London Plan modification directions.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>floorspace. now that Brent is a 'provide capacity' borough for industrial floorspace</p> <p>5.1.23 Outside the Wembley masterplan area There are a number of key sites which could contribute to Brent's housing need. Land either side of Brook Avenue is underutilised and recent development has established a denser character at both ends of the street. It is expected that Wembley Park Station car park is redeveloped to provide a significant number of new homes in line with London Plan guidance on station intensification. In addition, the residential units to the south of the road could be replaced with taller buildings to make better use of the land, reduce flood risk and provide an improved setting for Wealdstone Brook.</p>	
MiM17	5.1 Central place	5.1.27, pg. 47	<p><i>Amend last sentence of para 5.1.27 to read:</i></p> <p>The retail and leisure needs study identifies potential for development of further uses which support these functions should conform with Policy BE4 Protecting retail in town centres <u>Supporting Strong Centres</u>, but care should be taken to ensure that the centre's ability to meet day-to-day shopping needs is not reduced along with residential amenity and safety.</p>	Factual Update of Policy name

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM18	5.1 Central place	5.1.29, pg.47	<p><i>Amend para 5.1.29 to read:</i></p> <p>The London Industrial Land Demand Study identified Brent as needing to increase capacity across its Strategic Industrial Locations (SIL). The SIL east of Wembley Stadium forms part of a larger industrial site which should be protected to prevent further loss or undermining of the employment land hierarchy. Land at First Way and Watkin Road previously allocated due to its increased potential for high density development, provides greater scope than previously assumed to <u>can help address the need for industrial floorspace</u> Brent's status as a provide capacity borough in the London Plan by incorporating ground floor employment uses.</p>	Brevity and reflects Secretary of State's London Plan modification directions.
MiM19	5.1 Central place	5.1.30,pg. 47	<p><i>Remove last sentence of para 5.1.30 to read:</i></p> <p>Towards the east, SIL in the area bounded by development that will occur along First Way/Watkin Road area, London Plan SIL policy E7 will be implemented. If, however there has not been any tangible progress on delivery of intensification by 2029 (either on the ground or via credible developer interest and it is not deliverable due to viability) this area will be actively considered in an update of this Local Plan for co-location/intensification as an extension to the high density mixed use environment of Wembley Park.</p>	Removes unnecessary text for brevity and clarity
MiM20	5.1 Central place	5.1.33, pg.48	<p><i>Amend last sentence of para 5.1.33 to read:</i></p>	Acknowledge meanwhile status.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			The provision of Boxpark, Troubadour theatre (<u>meanwhile uses</u>) plus the development of Plot W12 which has permission for further cultural facilities provides the opportunity to further consolidate the cultural offer of the area in the longer term as part of the place making strategy.	
MiM21	5.1 Central place	5.1.37, pg.49	<i>Amend last sentence of para 5.1.37 to read:</i> Existing small open spaces should be protected and enhanced given the lack of public space currently available in the Central area. Sites of Special Nature Conservation Interest <u>Importance for Nature Conservation</u> such as the Wealdstone Brook and railway corridors provide the opportunity for further ecological enhancement of the place.	Factual
MiM22	5.1 Central place	Other Policy Guidance, pg.50	<i>Remove the following:</i> Other Policy Guidance <ul style="list-style-type: none"> • Approved Masterplan for Wembley Park relating to Planning Permission 15/5550 • Approved Masterplan for the South West Lands relating to Planning permission 14/4931 	Not adopted policy guidance and removes unnecessary text for brevity and clarity
MiM23	5.1 Central place	FIGURE 11 (South West Lands SW01/02 South Way), pg.78	<i>Amend to read:</i> Ref: 14/4931 & <u>18/0742</u>	Update

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Address: SW01/02/07 Indicative homes: 127 156 Comments: Site ready On site. Completion due 2022/23	
MiM24	5.1 Central place	FIGURE 11 (South West Lands SW03/04/05 South Way), pg.78	<i>Remove from list:</i> Ref: 14/4931 Address: SW03/04/05 South Way Indicative homes: 739 Comments: On site	Removed as completed.
MiM25	5.1 Central place	FIGURE 11 (South West Lands SW06/07 South Way), pg.78	<i>Remove from list:</i> Ref: 14/4931 Address: South West Lands SW06/07 South Way Size (ha): 0.1 Existing Use: NA Permission Uses: Residential Indicative homes: 29 Comments: Site ready	Removed included in SW01/02/07.
MiM26	5.1 Central place	FIGURE 11 (Mahatma Gandhi	<i>Remove from list:</i>	Removed as completed.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
		House, South Way), pg.78	Ref: 15/4714 Address: Mahatma Gandhi House, South Way Indicative homes: 198 Comments: On-site	
MiM27	5.1 Central place	FIGURE 11 (Wembley masterplan W03), pg.78	Remove from list: Ref: 03/3200 Address: Wembley masterplan W03 Indicative homes: 340 Comments: On-site Completion Autumn 2019	Removed as completed.
MiM28	5.1 Central place	FIGURE 11 (Wembley masterplan W06), pg.78	Remove from list: Ref: 15/5550 Address: Wembley masterplan W06 Indicative homes: 150 Comments: On-site	Removed as completed.
MiM29	5.1 Central place	FIGURE 11 (Wembley masterplan NW09/10), pg.78	Amend 'comments' to read: Comments: On-site. <u>Completion due 2022/2023</u>	Update
MiM30	5.1 Central place	FIGURE 11 (Wembley	Amend 'comments' to read:	Update

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
		masterplan NW11), pg.78	Comments: Meanwhile use completed. <u>Completion due 2030/31</u>	
MiM31	5.1 Central place	FIGURE 11 (1 Olympic Way), pg.78	<i>Amend 'ref' and 'comments' to read:</i> Ref: 17/4538 & 19/0395 Comments: <u>Started on site</u>	Update
MiM32	5.1 Central place	FIGURE 11 Wembley masterplan E01/02, pg.78	<i>Amend 'comments' to read:</i> Comments: On site <u>and party completed</u> — completion Autumn 2020	Update
MiM33	5.1 Central place	FIGURE 11 Wembley masterplan E03, pg.78	<i>Amend 'comments' to read:</i> Comments: On site <u>close to completion</u> — completion Autumn 2020	Update
MiM34	5.1 Central place	FIGURE 11 Wembley masterplan E05, pg.78	<i>Amend 'comments' to read:</i> Comments: On site - <u>Completion due 2021/22</u>	Update
MiM35	5.1 Central place	FIGURE 11 Amex House North End Road, pg.78	<i>Remove from list:</i> Ref: 16/1404	Removed as completed.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Address: Amex House North End Road Indicative homes: 195 Comments: Autumn 2020 Completion	
MiM36	5.1 Central place	FIGURE 11 Kelaty House First Way, pg.78	<i>Amend 'comments' to read:</i> Comments: Started <u>on site</u> .	Update
MiM37	5.1 Central place	FIGURE 11 6-10 Hallmark Trading Centre, Fourth Way HA9 0LB, pg.78	<i>Amend 'comments' to read:</i> Comments: Prior Approval - <u>Started on site</u>	Update

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM38	5.2 East	All paragraphs	<i>Amend numbering of all paragraphs in chapter 5.2 to read 5.2.x</i>	Publishing mistake
MiM39	5.2 East	5.2.8, pg.81	<i>Amend numbering and second last sentence of para 5.2.8 to read:</i> 5.1.8 <u>5.2.8</u> Smaller Locally Significant Industrial sites are located along Kingsbury Road, <u>Edgware Road</u> and near Neasden station.	To reflect all LSIS in the Place.
MiM40	5.2 East	Figure 13, pg.82	<i>Amend caption to read:</i>	To clarify that boundaries can be

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Figure 13 High Level Plan of the Place. <u>More detailed boundaries can be seen on the Policies Map</u>	viewed in greater detail on the policies map.
MiM41	5.2 East	Vision, 5.2.10, pg.83	<i>Amend third sentence of para 5.2.10 to read:</i> Employment <u>Industrial</u> space that meets 21 st century needs will be prioritised in association with new homes and social infrastructure.	To reflect London Plan policy emphasis on industrial provision.
MiM42	5.2 East	Vision, 5.2.11, pg.83	<i>Amend para 5.2.11 to read:</i> Elsewhere existing low density development and limited potential for improvements to public transport accessibility will mean extensive change is unlikely. Opportunities for new development will however exist, e.g. town centres and intensification corridors along main public transport corridors, whilst with <u>the height of</u> buildings related to these opportunities will be <u>being</u> typically be up to 5 to 6 storeys. a <u>Active</u> ground floor frontages will wherever possible be maintained <u>or improved</u> .	To reflect policy BD2 and the aspiration of improving town centres.
MiM43	5.2 East	5.2.15, pg.86	<i>Amend para 5.2.15 to read:</i> Elsewhere opportunities for taller buildings (up to 5 storeys) are considered likely to be appropriate along intensification corridors and Neasden town centre (up to	To reflect policy BD2

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			6 storeys) where the larger scale buildings in the area already exist.	
MiM44	5.2 East	5.2.23- 5.2.25, pg.87	<p><i>Amend 'Employment & Skills' para 5.2.23, para 5.2.24, para 5.2.25 to read:</i></p> <p>Employment & Skills</p> <p>5.2.23 The principal areas of industrial employment are currently the designated areas at Staples Corner, Kingsbury and Neasden. As identified Staples Corner and Neasden will be taken forward as Growth Areas. This will not be at the expense of employment <u>industrial</u> space, which needs to be added to. Much of these areas have suffered from very low levels of investment in premises over the years. As such many buildings' usefulness/ levels of employment provision are low. Where investment has been made, much has been in quasi retail/ trade counters.</p> <p>5.2.24 Consistent with London Plan policy, the council is seeking to ensure intensification of employment <u>industrial</u> use in modern fit for purpose premises. Providing the incentive to develop these however is considered more likely to happen with cross-subsidy from other more lucrative uses. The council recognises that to date the mixing of larger scale employment <u>industrial</u> uses with residential development in particular has been limited and needs careful management to be</p>	Consistency with the London Plan

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>successful, creating good environments for communities and businesses.</p> <p>5.2.25 The Kingsbury employment <u>industrial</u> area retains principally clearly defined boundaries, with very little encroachment from non-employment 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.</p>	
MiM45	5.2 East	Key Site Allocations, pg.88	<p><i>Amend to read:</i></p> <p>Neasden Stations Growth Area</p> <p>Staples Corner Growth Area</p> <p>Coombe Road</p> <p>Cricklewood Bus Depot.</p>	To reflect the most significant site allocations.
MiM46	5.2 East	After Key Site Allocations, pg.88	<p><i>Remove the following:</i></p> <p>Other Policy Guidance</p> <p>Staples Corner Growth Area Master Plan / Supplementary Planning Document / Area Action Plan (forthcoming)</p> <p>Neasden Stations Growth Area Master Plan / Supplementary Planning Document / Area Action Plan (forthcoming)</p>	Reflects current status of the guidance which has not yet been progressed.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM47	5.2 East	Figure 15	<i>Remove the following:</i> 13/2453 1 Barons Court Residential Residential 26	Site completed.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM48	5.3 North	Figure 16, pg. 108	<i>Amend caption to read:</i> Figure 16 High Level Plan of the Place. <u>More detailed boundaries can be seen on the Policies Map</u>	Clarification that policy area boundaries can be viewed more clearly on the policies map.
MiM49	5.3 North	Vision, 5.3.22, pg. 109	<i>Amend para 5.3.22 to read:</i> Intensification and co-location within the locally significant industrial sites in this place will create <u>employment industrial</u> space that meets 21st century needs and continue to provide good local employment opportunities.	Consistency with the London Plan.
MiM50	5.3 North	Vision, 5.3.23, pg.109	<i>Amend para 5.3.23 to read:</i> These however, will be more reflective of the suburban character in terms of scale, being no more than typically 5 storeys in height <u>or up to 6 storeys with potential to go higher at strategic points</u> in town centres. Other in-fill development will respect its context in terms of height and character.	Consistency with policy BD2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM51	5.3 North	5.3.26, pg.112	<p><i>Amend para 5.3.26 to read:</i></p> <p>Opportunities for buildings above 10 storeys will be promoted in the Burnt Oak and Colindale Growth Area. Opportunities for taller buildings (around 5 storeys) may be considered to be appropriate to support the intensification and co-location of employment<u>industrial</u> uses at the Queensbury LSIS and Morrisons sites. The same is true within the town centres (18 metres/ 6 storeys) and along the intensification corridors (15 metres/ 5 storeys) of the A4006 Kingsbury and Kenton Roads and A4140 Fryent Way and Honeypot Lane.</p>	Consistency with the London Plan and Local Plan (Policy BD2).
MiM52	5.3 North	5.3.28, pg.112	<p><i>Amend para 5.3.28 to read:</i></p> <p>The Capitol Valley site within the Burnt Oak and Colindale Growth Area contains <u>an</u> area of land designated as LSIS. Redevelopment of the site, which will be in accordance with the approved Masterplan, will need to address the requirement to intensify employment<u>industrial</u> uses too. In advance of the adoption of a masterplan for this site, the council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan.</p>	Grammar and consistency with the London Plan.
MiM53	5.3 North	5.3.29, pg.112	<p><i>Amend para 5.3.29 to read:</i></p> <p>Mixed-use redevelopment will also support intensification of employment<u>industrial</u> space on the LSIS in accordance with the borough's London Plan 'provide capacity' status through co-location with other</p>	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			uses policy E6. In addition, it increases the potential to improve the quality of the public realm along Honeypot Lane and Cumberland Road. A masterplanning exercise will be undertaken for this site to determine the approximate mix of uses to achieve an increase in employment-industrial floorspace and retention of a food store whilst providing a significant number of new homes and any required associated infrastructure.	
MiM54	5.3 North	5.3.40, pg.114	<i>Amend second sentence of para 5.3.40 to read:</i> The redevelopment of these sites is expected to intensify employment-industrial floorspace and ensure long term safeguarding for employment-industrial uses.	Consistency with the London Plan.
MiM55	5.3 North	5.3.46, pg.114	<i>Add new sentence at end of para 5.3.46 to read:</i> <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>	Reference to opportunity area
MiM56	5.3 North	5.3.47, pg.114	<i>Amend para 5.3.47 to read:</i> An extensive area of Locally Significant Industrial Site off Capitol Way provides the opportunity to better meet Brent's longer term employment-industrial needs through investment in new premises. Consistent with London Plan employment-industrial land policies and Brent's 'provide capacity' status , this area will need to be subject to wider masterplanning to ensure effective re-	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			provision. Subject to this process being undertaken, the area is identified as potentially acceptable for co-location to provide a more mixed use area that can also contribute towards improving the sense of place and meeting housing needs.	
MiM57	5.3 North	Key allocations, pg.116	<i>Amend key allocations to read:</i> Colindale Retail Park, <u>Multi-storey Car Park and Southon House and Trust Ford Garage</u> Queensbury <u>Honeypot Lane</u> LSIS and Morrisons	Consistency with allocation name.
MiM58	5.3 North	Other policy guidance, pg.116	<i>Remove:</i> Masterplans for Capitol Way Valley, Colindale Retail Park and Queensbury LSIS	Documents have yet to be progressed.
MiM59	5.3 North	Figure 18 15/1337, pg.130	<i>Remove reference to permission and associated text</i>	Development completed
MiM60	5.3 North	Figure 18 17/1342, pg.130	<i>Remove reference to permission and associated text</i>	Development completed
MiM61	5.3 North	Figure 18 17/1829, pg.130	<i>Amend 'comments' to read:</i> Supported accommodation. <u>Aiming for completion summer 2022.</u>	Update progress
MiM62	5.3 North	Figure 18 16/2353, pg.130	<i>Remove reference to permission and associated text</i>	Permission expired
MiM63	5.3 North	Figure 18 17/0837, pg.130	<i>Amend 'existing use' to read:</i> B8 Storage and distribution	Reflects move to description of uses rather than use classes in the Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM64	5.4 North West	All paragraphs	<i>Amend numbering of all paragraphs in chapter 5.4 to read 5.4.x</i>	Publishing mistake
MiM65	5.4 North West	5.4.12, pg.134	<p><i>Amend last para of 5.4.12 to read:</i></p> <p>These include good access to the strategic road network and a 'good and fit for purpose industrial land supply' which makes it supportive of employment <u>industrial</u> activities.</p>	Consistency with the London Plan.
MiM66	5.4 North West	Opportunities, pg.135	<p><i>Amend 'opportunities' point to read:</i></p> <ul style="list-style-type: none"> Intensification of employment <u>industrial</u> uses at East Lane. 	Consistency with the London Plan.
MiM67	5.4 North West	Figure 20, pg.136	<p><i>Amend caption to read:</i></p> <p>Figure 20 High Level Plan of the Place <u>More detailed boundaries can be seen on the Policies Map</u></p>	Clarity that more detailed policy boundaries can be seen on the policies map.
MiM68	5.4 North West	5.4.20, p.138	<p><i>Amend last para of 5.4.20 to read:</i></p> <p>In addition, town centres and intensification corridors will accommodate development of potentially around 18 metres (6 storey) and 15 metres (5 storeys) respectively, <u>with the opportunity to go higher at strategic points in the town centres.</u></p>	Consistency with BD2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM69	5.4 North West	Prior to 5.4.24, pg.138	<p><i>Amend to add as title and remove from para 5.4.24:</i></p> <p><u>Employment and Skills</u></p> <p>5.4.24 Employment and Skills, In comparison to other places....</p>	Heading misplaced in paragraph text.
MiM70	5.4 North West	5.4.26, pg.138	<p><i>Amend para 5.4.24 to read:</i></p> <p>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.</p>	Consistency with the London Plan.
MiM71	5.4 North West	5.4.30, pg.139	<p><i>Remove last sentence from para 5.4.30 to read:</i></p> <p>Furthermore, the opportunities to improve the sports pavilion to support the development that is to come forward within the Growth Area will be supported. One option being considered is to swap the land currently occupied by the sports pavilion and car park with an equivalent area adjacent to Northwick Park station to create an open, active and welcoming frontage by the station. The location of the new sports pavilion has yet to be agreed. Any MOL land swap associated with this will need to demonstrate that it is in compliance with London and national policy, and ensure that there is no net loss in open space.</p>	This option has now been discounted.
MiM72	5.4 North West	5.4.38, pg.140	<i>Amend first sentence of para 5.4.38 to read:</i>	Correct name

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Northwick Park and the Ducker Pond Pool are a designated SINC site of borough importance (Grade I).	
MiM73	5.4 North West	Other Policy Guidance, pg.140	<i>Remove:</i> Other Policy Guidance Northwick Park Master Plan/ Supplementary Planning Document/ Area Action Plan (forthcoming)	Document not adopted.
MiM74	5.4 North West	Figure 21 17/3717, pg.148	<i>Amend 'comments' to read:</i> <u>Works started on site late 2019</u>	Update progress
MiM75	5.4 North West	Figure 21 16/3294, pg.148	<i>Amend 'comments' to read:</i> <u>Assisted Living Accommodation. Works to complete late 2022.'</u>	Update progress

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM76	5.5 South Place	Chapter Heading, pg.149	<i>Amend chapter heading to read:</i> <u>"SOUTH PLACE"</u>	Consistency in the document
MiM77	5.5 South Place	5.5.2, pg.151	<i>Amend last sentence of para 5.5.2 to read:</i> St Raphael's is a housing estate with a mixed architectural character, from 1960s three- to -four storey apartment blocks to more traditional two-storey terraces to the east.	To correct typo

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM78	5.5 South Place	5.5.6, pg.151	<p><i>Amend first part of para 5.5.6 to read:</i></p> <p><u>This Place also contains the southern part of Wembley SIL either side of the North Circular Road. Locally Significant Industrial Sites in Church End contain low density employment-industrial uses and have a poor quality environment.</u></p>	Reflects element of SIL within the area and consistency with the London Plan
MiM79	5.5 South Place	Figure 23, pg.153	<p><i>Edit caption to read:</i></p> <p>High Level Plan of the Place <u>More detailed boundaries can be seen on the Policies Map</u></p>	Clarity where more detailed policy boundaries are.
MiM80	5.5 South Place	5.5.30, pg.159	<p><i>Amend para 5.5.30 to read:</i></p> <p>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 focussed around a new High Speed 2 and Elizabeth Line interchange and intensification 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 Transport for London, 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</p>	Change related to modifications to draft OPDC Local Plan following Car Giant site change and taking account of information on Willesden Junction station.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Oak and Harlesden through , <u>now likely to focus on Old Oak Lane</u> , in addition to an enhanced Willesden Junction Station (including over-station development), and wayfinding...	
MiM81	5.5 South Place	5.5.32, pg.160	<p><i>Amend para 5.5.32 to read:</i></p> <p>The West London Orbital will further improve the connectivity of this area making it a desirable location to live and work. There is an opportunity to extend the Growth Area boundary to include nearby low density employment-industrial sites to promote investment in these areas. Church End Locally Significant Industrial Sites are low density employment-industrial sites, which also contain uses including retail. These sites have experienced limited investment and in places have a low quality environment. Intensifying these areas through mixed-use development will encourage investment whereby residential development can support the provision of modern workspace to help meet the borough's need for incubators, accelerators and co-working space. The West London Orbital route will greatly increase public transport accessibility levels in this location, further supporting the need for higher density development on these sites. In advance of adoption of a Church End masterplan supplementary planning document which will seek comprehensive solutions for these employment-industrial areas, small scale release of sites will be resisted.</p>	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM82	5.5 South Place	5.5.34, p,160	<p><i>Amend second sentence of para 5.5.34 to read:</i></p> <p>With the exception of the Afghan Community Centre there is a lack of community space in Church End. A new space to serve as an employment, a <u>workspace</u>, <u>multi-use</u> community centre, and health hub <u>a primary care health centre</u> will help promote community cohesion.</p>	Consistency with BP5.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM83	5.6 South East Place	5.6.5, pg.183	<p><i>Amend para 5.6.5 to read:</i></p> <p>Although there are no designated employment <u>industrial</u> sites here, there is a strong entrepreneurial culture with the highest proportion of micro businesses (with less than 9 employees), home working and self-employment in the borough. Creative businesses are clustered in Queen's Park Creative Quarter on Lonsdale Avenue <u>Road</u>, Kilburn High Road and increasingly at Willesden Green. Employment is concentrated in ICT, media, creative services, professional and financial services.</p>	Consistency with the London Plan and factual correction.
MiM84	5.6 South East Place	5.6.8, pg.184	<p><i>Amend para 5.6.8 to read:</i></p> <p>The London Overground travels through this place <u>providing an orbital route</u> linking Richmond/Clapham</p>	Clarification of what London Overground does.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Junction and Stratford, stopping at Willesden Junction, Kensal Rise, Brondesbury Park and Brondesbury. Orbital travel further north in this place is reliant on the bus network, which due to road congestion is less reliable. In particular, the A5 is a congested route into central London.	
MiM85	5.6 South East Place	Challenges, pg.183	<p><i>Amend first point to read:</i></p> <ul style="list-style-type: none"> Although generally a relatively an affluent place there are areas of deprivation particularly in South Kilburn, parts of which in 2015 were in the top 10% of the most deprived areas in the country. Linked to this parts of Kilburn experience amongst the lowest levels of reported good health in the borough. 	To correct typo
MiM86	5.6 South East Place	Opportunities, pg.183	<p><i>Amend fifth point to read:</i></p> <ul style="list-style-type: none"> Support and enhance clusters of creative industries in Queen's Park, Willesden Green and Kilburn to establish Creative Quarters and help meet demand for incubators, accelerators and co-working space. Consider the potential for these clusters to be future Creative Enterprise Zones, a designation by the Mayor of London which recognises an area's contribution to supporting creative activity, including artists and creative businesses. Supporting research into a 'Creative Clusters' and possible establishment of 	To clarify that the phrase 'creative clusters' is in relation to London Plan HC5.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>a Creative Enterprise Zone within Queen's Park, Willesden Green and Kilburn, in accordance with London Plan policy HC5 'Supporting London's Culture and Creative Industries'.</u>	
MiM87	5.6 South East Place	Opportunities, pg.183	<p><i>Amend seventh point to read:</i></p> <ul style="list-style-type: none"> • Creation of a West London Orbital passenger route on the Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to the proposed Brent Cross <u>West</u> Thameslink station (Midland Main Line). 	Factual
MiM88	5.6 South East Place	Opportunities, pg.183	<p><i>Remove final point:</i></p> <ul style="list-style-type: none"> • The proposed Kensal Canalside development of 3,500 new homes and other uses in the adjacent Royal Borough of Kensington and Chelsea lies to the south of this Place 	Brevity.
MiM89	5.6 South East Place	Figure 26, pg.182	<p><i>Amend caption to read:</i></p> <p>Figure 26 High Level Plan of the Place <u>More detailed boundaries can be seen on the Policies Map</u></p>	Clarity that more detailed policy boundaries can be seen on the policies map.
MiM90	5.6 South East Place	5.6.11-5.6.12, pg.186	<p><i>Amend para 5.6.11 and para 5.6.12 of 'Character, Heritage and Design' to read:</i></p> <p>Character, Heritage and Design</p> <p>5.6.11 The council is undertaking a review of conservation area boundaries and producing</p>	Factual and consistent with Policy BD2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Conservation Area Design Guides. The proposed extension to the Mapesbury, <u>Kensal Green, Queen's Park, Brondesbury, Kilburn and Willesden Green Conservation Areas</u>, plus potential new ones for <u>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. This will ensure that future development contributes positively to the character of these areas.</p> <p>5.6.12 This place has a strong sense of character, dominated by two to three storey Victorian terraces and suburban houses with large gardens. Developments should reflect this characteristic with the exception of the South Kilburn Growth Area <u>which is identified as a Tall Buildings Zone</u> where more intense redevelopment at higher densities is part of the SPD for the area. Elsewhere In intensification corridors such as the A407 High Road and A4003 Willesden Lane, <u>denser development buildings up to 5 storeys in height could be appropriate.</u></p>	
MiM91	5.6 South East Place	5.6.22, pg.187	<p><i>Amend second sentence of para 5.6.22 to read:</i></p> <p>Within this area there are no designated employment <u>industrial</u> sites, but a high level of micro-businesses and home working.</p>	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM92	5.6 South East Place	5.6.23, pg.188	<p><i>Amend third sentence of para 5.6.23 of Open Space and Biodiversity' to read:</i></p> <p>It will therefore be important to ensure the quality of existing open spaces are enhanced. In the Keep Britain <u>Tidy</u> qualitative study forming part of the Brent Open Space Study (2019), open spaces in this place overall scored highly.</p>	To correct
MiM93	5.6 South East Place	5.6.24, pg.188	<p><i>Amend third sentence of para 5.6.24 of 'Transport' to read:</i></p> <p>The West London Orbital, which will make use of the existing Dudding Hill freight line is a key opportunity to improve orbital links and connect the area to High Speed 2 and Crossrail <u>Elizabeth Line</u> and Old Oak and to the east Thameslink at Brent Cross.</p>	To reflect name change
MiM94	5.6 South East Place	Key site allocations, pg.190	<p><i>Amend Key Site Allocations to read:</i></p> <p>South Kilburn Growth Area Cricklewood Retail Park and Town Centre sites Kilburn Market Square Willesden Green Town Centre sites</p>	To clarify larger key sites
MiM95	5.6 South East Place	Other policy guidance, pg190	<p><i>Amend list to read:</i></p> <p>Mapesbury <u>Conservation Area</u> Design Guide North Kilburn <u>Conservation Area</u> Design Guide Queen's Park <u>Conservation Area</u> Design Guide</p>	Correct titles.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM96	5.7 South West Place	5.7.2, pg.237	<i>Amend first sentence of para 5.7.2 to read:</i> The South West place includes an area which has been subject to neighbourhood planning, in the adopted Sudbury <u>Town</u> Neighbourhood Plan.	Correct name
MiM97	5.7 South West Place	5.7.3, pg.237	<i>Amend third sentence of para 5.7.3 to read:</i> There are however two Growth Areas delivering ambitious regeneration in Wembley (<u>which also crosses over into the Central place</u>), centred around the town centre, and Alperton around the underground station and along the Grand Union Canal.	Factual
MiM98	5.7 South West Place	Figure 30, pg.238	<i>Amend caption to read:</i> Figure 30 High Level Plan of the Place <u>More detailed boundaries can be seen on the Policies Map</u>	Clarity that more detailed policy boundaries can be seen on the policies map.
MiM99	5.7 South West Place	5.7.11, p.239	<i>Amend third sentence of para 5.7.11 to read:</i> Sudbury & Harrow <u>Road</u> rail station is located within the town centre boundary, with Sudbury Town tube station located to the south	Correct name
MiM100	5.7 South West Place	5.7.15, pg.242	<i>Amend para 5.7.15 to read:</i> Outside these regeneration areas building height will more reflective of the local context. Town centres (around 18 metres/6 storeys) and intensification	Consistency with BD2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			corridors (around 15 metres/5 storeys) will provide the opportunity for some additional height. Elsewhere development will be expected to come forward at levels not significantly higher than existing two and three storey developments.	
MiM101	5.7 South West Place	5.7.22, pg.243	<i>Amend para 5.7.22 to read:</i> 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 <u>research and development/light industrial/general industrial/storage or distribution</u> and where possible its use intensified.	Consistency with the London Plan.
MiM102	5.7 South West Place	5.7.23, pg.244	<i>Amend first sentence of para 5.7.23 to read:</i> Redevelopment of existing industrial floorspace and provision of new employment <u>industrial</u> floorspace in mixed-use development (co-location) will be accepted in the Growth Area on LSIS around the junction of Ealing Road and Bridgewater Road where set out in site allocations.	Consistency with the London Plan.
MiM103	5.7 South West Place	5.7.31, pg.245	<i>Amend second last sentence of para 5.7.31 to read:</i> The redevelopment of Northfields Grand Union which has commenced for approximately 2900 <u>3030</u> new homes plus employment land, social infrastructure and energy centre by St George Homes indicates the confidence in the area's long term potential.	Correct dwellings to reflect current planning permission.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM104	5.7 South West Place	5.7.32, pg.246	<p><i>Amend second last sentence of para 5.7.32 to read:</i></p> <p>Taking account of much of its use as either Locally Significant Industrial Site, Local Employment Site and Strategic Industrial Land and Brent's <u>need to provide for additional industrial floorspace</u> provide capacity status for employment land in the London Plan, a greater emphasis on employment <u>industrial</u> use in mixed use developments is now sought than was previously the case in allocations.</p>	Consistency with the London Plan and brevity.
MiM105	5.7 South West Place	After 5.7.33	<p><i>Insert after para 5.7.33 to read:</i></p> <p><u>Relevant Policy Documents</u></p> <p><u>Sudbury Town Neighbourhood Plan</u></p>	For clarity
MiM106	5.7 South West Place	Key sites , pg. 246	<p><i>Amend key site name to read:</i></p> <p>Northfields East of Grand Union</p>	Consistency across the Plan with allocation name.
MiM107	5.7 South West Place	Figure 32, pg.271, 253a Ealing Road	<p><i>Amend 'comments' to read:</i></p> <p>Comments: Not started</p>	Update
MiM108	5.7 South West Place	Figure 32 , pg.271, 1C Carlyon Road	<i>Remove record</i>	Completed
MiM109	5.7 South West Place	Figure 32 , pg.271, 2 Atlip Road	<i>Remove record</i>	Expired

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM110	5.7 South West Place	Figure 32 , pg.271, All Units at Abbey Wharf & Delta Centre and All of 152, Mount Pleasant	<i>Remove record</i>	Completed
MiM111	5.7 South West Place	Figure 32 , pg.271, Heron House, 109-115 Wembley Hill Road	<i>Amend 'comments' to read:</i> Comments: Prior approval -started	Update
MiM112	5.7 South West Place	Figure 32, pg.271, Chesterfield House	<i>Remove record</i>	Completed
MiM113	5.7 South West Place	Figure 32 , pg.271, Brent House	<i>Remove record</i>	Completed
MiM114	5.7 South West Place	Figure 32 , pg.271, Cottrell House, 53-63 Wembley Hill Road	<i>Remove record</i>	Completed

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM115	6.1 Design	6.1.10 London Plan, p.276	<i>Amend London Plan policies to read:</i> LONDON PLAN Policy D4A2 Infrastructure Requirements for Sustainable Densities Policy D4b3 Optimising site capacity through a design led approach	Correct policy references.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Policy D2 <u>4</u> Delivering Good Design Policy D3 <u>5</u> Inclusive Design Policy D4 <u>6</u> Housing Quality and Standards Policy D5 <u>7</u> Accessible Housing Policy D7 <u>8</u> Public Realm <u>Policy D9 Tall Buildings</u> Policy D10 <u>1</u> Safety, security and resilience to emergency Policy D14 <u>2</u> Fire Safety Policy D12 <u>3</u> Agent of Change Policy D13 <u>4</u> Noise	
MiM116	6.1 Design	6.1.23, pg,280	<i>Amend first sentence of para 6.1.23 to read:</i> London Plan Policy D9 <u>10</u> Basements <u>development</u> requires the council to establish a policy to address the negative impacts of large-scale basement development below existing buildings.	Correct policy reference
MiM117	6.1 Design	6.1.23 London Plan, pg,280	<i>Amend London Plan policies to read:</i> D9 <u>10</u> Basements <u>development</u> HC1 Heritage conservation and growth	Correct policy reference

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM118	6.2 Housing	6.2.2, pg.282	<i>Amend last sentence of para 6.2.2 to read:</i>	Consistency with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			The draft London Plan increases it to 2,915 <u>2,350</u> from 2019/20.	
MiM119	6.2 Housing	6.2.12, pg. 284	<p><i>Amend para 6.2.12 to read:</i></p> <p>The cost, limited availability of housing and flexibility of development rights has resulted in many Brent homes becoming houses in multiple occupation (HMO); properties shared by two or more households. Whilst they do <u>Where such accommodation is purpose built, well managed and high quality it provides</u> a valuable role in meeting housing need <u>and will be supported</u>. <u>However where this is not the case</u> their concentration can sometimes have adverse impacts on neighbours. This includes; poor maintenance of properties and waste management, overcrowding, increased anti-social behaviour, pressure on parking and other social infrastructure. <u>HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families</u>. Increased permitted development rights together with lack of housing licensing requirements for smaller HMOs until quite recently has resulted in the council having a limited ability to address this matter. There are now approximately 16,000 HMOs in Brent.</p>	Provide clarity on positive and negative attributes of HMOs.
MiM120	6.2 Housing	6.2.13, pg.284	<i>Amend last sentence of para 6.2.13 to read:</i>	Revised timetable for proposed Article 4 start date.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Nevertheless, the council is likely to go through the process of removing permitted development rights for change of use to HMOs to come into effect in 2020 <u>2022</u> .	
MiM121	6.2 Housing	6.2.16, pg.285	<i>Amend last sentence of para 6.2.16 to read:</i> The draft London Plan sets a benchmark target <u>figure</u> for Brent of 230 additional homes per year.	Consistency with London Plan.
MiM122	6.2 Housing	6.2.18, pg.285	<i>Amend second last sentence of para 6.2.18 to read:</i> With the likely further <u>higher</u> education sector expansion proposed, accommodation needs are increasing.	Clarity that the expansion will be in higher education which generates the accommodation needs rather than further education.
MiM123	6.2 Housing	6.2.20, pg.286	<i>Remove last sentence of para 6.2.20 to read:</i> The draft London Plan definition includes more qualifying criteria.	Reflects Secretary of State's directions to modify the London Plan.
MiM124	6.2 Housing	6.2.21, pg.286	<i>Amend para 6.2.21 to read:</i> The council with other West London boroughs undertook a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment in 2018. This used both definitions. The national definition <u>used</u> identified no additional pitch needs. Indeed Lynton Road <u>Close</u> occupiers are not defined as Gypsies or Travellers for planning purposes due to their limited travelling. <u>More recent work by the Council in assessing the quality of</u>	Reflects Secretary of State's directions to modify the London Plan definition and more recent Council work assessing the Lynton Close site and occupiers' needs.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>accommodation available at the Lynton Close site indicates the need for significant on-site improvements. If these cannot be achieved potentially an alternative site might need to be identified to meet all current occupants' accommodation needs. Using the alternative London Plan definition, a minimum of 90 additional pitches are required. Assuming traditional levels of density of accommodation this would indicate the need for nearly 3 hectares of additional sites. This would translate into the need for three or more sites, depending on their size.</u></p>	
MiM125	6.2 Housing	After 6.2.27 London Plan, pg.287	<p><i>Amend London Plan policies to read:</i></p> <p>LONDON PLAN</p> <p>Policy H3 Monitoring housing targets</p> <p>Policy H4₃ Meanwhile use</p> <p>Policy H5₄ Delivering affordable housing</p> <p>Policy H6₅ Threshold approach to applications</p> <p>Policy H7₆ Affordable housing tenure</p> <p>Policy H8₇ Monitoring of affordable housing</p> <p>Policy H9 Vacant building credit</p> <p>Policy H10₈ Redevelopment <u>Loss of existing housing and estate regeneration redevelopment</u></p> <p>Policy H11₉ Ensuring the best use of stock</p> <p>Policy H12₁₀ Housing size mix</p>	Consistency with London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Policy H4311 Build to Rent</p> <p>Policy H4412 Supported and specialised accommodation</p> <p>Policy H4513 Specialist older persons housing</p> <p>Policy H4614 Gypsy and Traveller accommodation</p> <p>Policy H4715 Purpose-built student accommodation</p> <p>Policy H4816 Large-scale purpose-built shared living</p>	
MiM126	6.2 Housing	6.2.31, pg.288	<p><i>Amend last sentence of para 6.2.31 to read:</i></p> <p>These will assist in <u>helping provide more certainty of getting closer to or ideally exceeding</u> Brent's London Plan target of 29,150 <u>a minimum of 23,250</u> dwellings in the period to 2028/29.</p>	Consistency with London Plan.
MiM127	6.2 Housing	6.2.32, pg.288	<p><i>Amend first sentence of para 6.2.32 to read:</i></p> <p>National policy requires that <u>assessment of</u> both the potential to achieve the Local Plan housing target and its actual delivery is undertaken on an annual basis.....</p>	Clarity.
MiM128	6.2 Housing	6.2.32 London Plan, pg.288	<p><i>Remove London Plan policy from list:</i></p> <p>Policy H2A Small Housing Developments</p>	Consistency with London Plan.
MiM129	6.2 Housing	6.2.33, pg.288	<p><i>Amend para 6.2.33 to read:</i></p> <p>In addition to the Growth Areas and Site Allocations <u>in</u> the Plan, consistent with national and London Plan</p>	Grammar. Consistency with Policy BD2 and its justification.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>policy, town centres and areas with higher levels of public transport accessibility, <u>some of which the Council has also identified as intensification corridors with the potential for increased building heights to encourage small sites windfall residential development</u>, are priority areas for the provision of the additional homes required. The intensification corridors have been identified not only on the basis of their public transport accessibility (PTAL3 or above) but also their capacity in terms of their existing character (taking account of matters including current built form, width of roads and relationships with adjoining buildings), accessibility to social infrastructure and environmental factors related to providing an acceptable residential environment. Where these priority areas <u>for additional homes</u> are adjacent or along the borough boundary, the council will work with adjoining boroughs and the OPDC to identify consistency of approach to development and infrastructure that might be required to serve areas that straddle boundaries. As well as meeting housing needs, it is recognised that additional homes and their residents can bring other benefits to areas, such as their regeneration, or in the case of town centres, bring additional activity to an area. Nevertheless, non-residential uses can also play an important role in an area. They can add to the vitality and viability of these places and in meeting employment and other needs of the population, businesses and other groups. Residential development tends to be a higher</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			monetary value use that can displace other not so financially valuable uses.	
MiM130	6.2 Housing	6.2.37, pg.290	<i>Amend fourth sentence of para 6.2.37 to read:</i> The London Plan Policy H4311 sets out the criteria for a development to be defined as Build to Rent, including a minimum size of 50 dwellings.	Consistency with London Plan.
MiM131	6.2 Housing	6.2.38, pg.291	<i>Amend para 6.2.38 to read:</i> To limit risks of unintended consequences of this policy expectation, where there are genuine reasons why on-site provision might cause unintended consequences some flexibility is allowed. <u>This might be for example if a site owner/developer has made genuine attempts to work with a build to rent operator but has been unsuccessful in being able to come to an agreement, meaning likelihood of significant programme delays which where provision is likely to be severe for housing delivery overall. Alternatively it could be if the inclusion of a build to rent element within the scheme can be evidenced to adversely affect viability to such an extent that it significantly undermines or affordable housing provision.</u> At the other extreme, the council does not wish to see all large scale development sites coming forward as build to rent. It wants to encourage additional home ownership opportunities within the borough for those that can afford it. Again this is part of its desire to see balanced and mixed communities where people have	More detailed policy justification consistent with the policy criteria.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			a long term commitment to the area and thus are likely to contribute more fully towards its social cohesion.	
MiM132	6.2 Housing	After 6.2.38 London Plan	<i>Amend London Plan policy to read:</i> LONDON PLAN Policy H4211 Build to Rent	Consistency with London Plan.
MiM133	6.2 Housing	6.2.43, pg.292	<i>Amend first part of para 6.2.43 to read:</i> London Plan Policy H65 sets a threshold approach to affordable housing provision to remove the need for viability assessment. The affordable target is set and assessed on the basis of the percentage of the development's habitable rooms, or if there is a disparity between affordable and private room sizes, the habitable floorspace. Policy H76 sets out the Mayor's minimum requirements in terms of tenure for 60% of the affordable housing sought.	Consistency with London Plan.
MiM134	6.2 Housing	6.2.44, pg,292	<i>Amend first sentence of para 6.2.44 to read:</i> The council is very supportive of the Mayor's long term 50% affordable housing target and in the interim the fast track approach as set out in policy H65 as a tool towards achieving the 50% on all sites in the longer term.	Consistency with London Plan.
MiM135	6.2 Housing	6.2.46, pg.293	Remove last sentence from para 6.2.46: In these situations, where the case is proven, flexibility will be shown on the part of the council to allow a move away from the preferred tenure of social rent/ London Affordable Rent. This will however be to homes that will	Clarity and consistency with 6.2.47

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			still be affordable to those that are able to receive housing benefits.	
MiM136	6.2 Housing	6.2.48, pg.293	<i>Amend first sentence of para 6.2.48 to read:</i> London Plan Policy H1311 sets out a requirement for 30% of the affordable dwellings within a build to rent scheme to be at London Living Rent levels.	Consistency with London Plan.
MiM137	6.2 Housing	6.2.50, pg.294	<i>Remove fourth sentence from para 6.2.50 to read:</i> The extent of affordable housing need in Brent is very great. Small sites are expected to contribute a significant number of homes to meeting Brent's housing target. The Local Plan viability study indicates that minor developments (of under 10 dwellings) are sufficiently viable to provide some affordable housing. London Plan Policy H6 identifies that boroughs for a number of reasons should only seek to address affordable housing requirements on minor developments through a tariff approach to off-site contributions. The level of contribution sought will be identified in an Affordable Housing Commuted Sum calculator made available on the council's website.	Consistency with London Plan Secretary of State direction to modify.
MiM138	6.2 Housing	6.2.53, pg.294 London Plan	<i>Amend London Plan policies to read:</i> LONDON PLAN Policy H76 Affordable housing tenure Policy H87 Monitoring of affordable housing	Consistency with London Plan

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Policy H4311 Build to Rent	
MiM139	6.2 Housing	6.2.54, pg.295	<i>Amend first sentence of para 6.2.54 to read:</i> In terms of dwelling sizes Brent's predominant needs (6554%) are more for larger sized (3 bed or more) family dwellings.	Factual - reflects 2018 Brent SHMA.
MiM140	6.2 Housing	6.2.56 London Plan, pg.295	<i>Amend London Plan policies to read:</i> LONDON PLAN Policy H4210 Housing size mix	Consistency with London Plan
MiM141	6.2 Housing	6.2.61, pg.296	<i>Amend third sentence of para 6.2.61 to read:</i> Where self-contained rooms are proposed they will be assessed against London Plan Policy D46 <u>Housing Quality and standards</u> .	Consistency with London Plan
MiM142	6.2 Housing	6.2.63, pg.297	<i>Amend para 6.2.63 to read:</i> Affordable housing requirements will be applicable to qualifying proposals for accommodation classified as C3 under this policy. Student accommodation is also subject to affordable requirements, as set out in London Plan Policy H4715. Shared living affordable housing requirements are set out in London Plan Policy H4816.	Consistency with London Plan
MiM143	6.2 Housing	6.2.69, pg.298	<i>Amend para 6.2.69 of 'Houses in Multiple Occupation (HMOs)' to read:</i> Houses in Multiple Occupation (HMOs)	Consistency with amended policy wording and to provide greater clarity on how Build to Rent schemes will be

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>HMOs must meet the standards of Brent's HMO licensing scheme, including minimum room sizes. These sizes have been developed in accordance with the Housing Act 2004. To reduce the potential for over-concentration the policy adopts a simple approach of seeking to allow no more than 4 of any 11 adjacent 3 of properties being HMOs <u>where three already exist in the ten nearest properties to the application property. This is measured taking the nearest front entrances when walking from the front door of the application property (so this is likely to exclude properties that share a rear garden boundary with the application property for instance). Each individual flat is regarded as one property for the purposes of this calculation. Where the application property is a flat, flats on the same floor are counted first within the ten. For houses this will be taken as 5 self-contained dwellings on each side on the proposal on the same side of the street, or as far up to 5 as possible with the remainder of the 10 on the property's other side. For flats the test will apply to adjacent self-contained properties sharing the same entrance, and if these do not add up to 11, then neighbouring properties.</u> 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</u></p>	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>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 an agreed number of dwellings can be used as Houses in Multiple Occupation at any one time.</u>	
MiM144	6.2 Housing	6.2.71, pg.298	<i>Amend last sentence of para 6.2.71 to read:</i> The London Plan has detailed policy H1815 in relation to student accommodation.	Update policy with London Plan.
MiM145	6.2 Housing	6.2.72, pg.299	<i>Amend para 6.2.72 to read:</i> Other than in exceptional circumstances proposals should not result in the loss of permanent self-contained accommodation <u>with shared facilities or additional support. Such accommodation which provides care</u> will be protected unless it is no longer needed in the borough or it is <u>replacing unsatisfactory accommodation</u> that and cannot be brought up to current standards. Given the likely need for additional supported housing within the borough, the council is keen to ensure that the opportunity to reuse <u>supported housing sites</u> or those with planning permission for supported accommodation are considered and given the	Ensuring consistency of policy justification with policy content.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			opportunity to occupy these sites. This could be in its existing or reconfigured/ redeveloped form on the site. As such the owner will be expected to work with the council and use reasonable endeavours to test these opportunities with potential end users prior to, if this proves to be unsuccessful, accepting the potential for other non-supported uses being considered/ taken forward.	
MiM146	6.2 Housing	6.2.76, pg.299, London Plan	<p><i>Amend London Plan policies to read:</i></p> <p>LONDON PLAN</p> <p>Policy D46 Housing quality and standards</p> <p>Policy H1412 Supported and specialised accommodation</p> <p>Policy H1715 Purpose-built student accommodation</p> <p>Policy H1816 Large-scale purpose-built shared living</p>	Consistency with London Plan
MiM147	6.2 Housing	6.2.77, pg.300	<p><i>Amend para 6.2.77 to read:</i></p> <p>The SHMA identified a need for more specialist accommodation to meet the needs of the growing numbers of older people. The London Plan sets an annual specialist housing for older people <u>benchmark figure</u> target for Brent of 230 dwellings. The Brent SHMA provides further detail and identifies that this will be across a range of products, including the traditional sheltered to schemes with increasing levels of support, such as extra care or specialist such as dementia.</p>	Consistency with London Plan terminology.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM148	6.2 Housing	6.2.78, pg.300	<p><i>Amend para 6.2.78 to read:</i></p> <p>Specialist older people's housing is provided by both the market, registered providers such as the council and Housing Associations and charities. More often than not however most models cannot compete directly with private sector led build for sale homes in the land market. As such the council is seeking to ensure that the potential for them to gain access to sites is made available through this policy. A specific percentage for <u>all individual sites across the borough</u> is not considered appropriate in policy as the models of delivery of specialist accommodation will vary related to delivery models reflective of needs. <u>It may for example that an Extra-care scheme typically require a large number of dwellings to allow on-site provision of a range of support services to residents, whilst those with limited support or at the greater scale of intervention can be smaller in scale. On individual sites in Growth Areas it is therefore accepted that some may provide more housing for older people than others, although the emphasis will be on providing 10% overall. Given that many types of older people's schemes are supported by Registered Providers, there might well also be opportunities to consider to what extent affordable housing requirements on sites can be tied into potential older people's housing provision.</u> As such the Council will seek evidence from the developer that they have made best endeavours from the outset to consider and accommodate a range</p>	Reflects modification of target being set for sites over 500 dwellings and provides detail on range of accommodation types that might require different approaches.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			of types of specialist older people's housing in Growth Areas and on large housing capacity sites. South Kilburn is excluded from this policy due to the need to re-house the existing population within social rent properties which requires significant levels of subsidy generated by conventional market housing sales.	
MiM149	6.2 Housing	6.2.78a, pg.300	<p><i>Insert new para 6.2.78a after 6.2.78 to read:</i></p> <p><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></p>	Increased guidance.
MiM150	6.2 Housing	6.2.78, pg.300, London Plan	<p><i>Amend London Plan policies to read:</i></p> <p>LONDON PLAN</p> <p>Policy H4513 Specialist older persons housing</p>	Consistency with London Plan
MiM151	6.2 Housing	6.2.84, pg.302, London Plan	<p><i>Amend London Plan policies to read:</i></p> <p>LONDON PLAN</p>	Consistency with London Plan

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Policy H46 14 Gypsy and Traveller accommodation	
MiM152	6.2 Housing	6.2.85, pg.303	<p><i>Amend para 6.2.85 to read:</i></p> <p>The housing targets for Brent will be challenging to achieve. Loss of existing housing to make way for other forms of development would exacerbate this. London Plan Policy H108 deals with the redevelopment <u>loss</u> of existing housing and estate regeneration <u>redevelopment</u>. Brent seeks to supplement this policy by providing greater clarity on locally specific additional limited circumstances it is likely to consider such loss appropriate.</p>	Consistency with London Plan
MiM153	6.2 Housing	6.2.89, pg.303, London Plan	<p><i>Amend London Plan policies to read:</i></p> <p>LONDON PLAN</p> <p>Policy H108 Redevelopment <u>Loss</u> of existing housing and estate regeneration <u>redevelopment</u></p>	Consistency with London Plan
MiM154	6.2 Housing	6.2.91, pg.304	<p><i>Amend last sentence of para 6.2.91 to read:</i></p> <p>This size is used to ensure that the proposed dwellings within the development would be London Plan Policy D46 space compliant. Effort should be made to provide all additional flats with amenity space.</p>	Consistency with London Plan – for clarity 4 has been struck through.
MiM155	6.2 Housing	6.2.92, pg.305, London Plan	<p><i>Amend London Plan policies to read:</i></p> <p>LONDON PLAN</p>	Consistency with London Plan – for clarity 4 has been struck through.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			D46 Housing quality and standards	
MiM156	6.2 Housing	6.2.95, pg.305	<p><i>Amend para 6.2.95 to read:</i></p> <p>London Plan Policy D46 and also the Housing SPG give significant direction on the standards and quality that residential development is expected to achieve. In Brent all new housing should comply with the standards. Brent has a high proportion of overcrowded dwellings. It also has some very poor quality private rented accommodation. The council is taking measures through its statutory roles related to housing in improving the quality of residential accommodation in the Borough and the reducing the incidences of poor properties. Planning has a complementary role to play in reducing the opportunities for overcrowding to occur.</p>	Consistency with London Plan and Grammar – for clarity 4 has been struck through.
MiM157	6.2 Housing	6.2.99, pg.306	<p><i>Amend first sentence of para 6.2.99 to read:</i></p> <p>The London Plan Policy D46 sets out a baseline minimum standard amount for the provision of amenity space in new developments and the characteristics it is expected to have.</p>	Consistency with London Plan– for clarity 4 has been struck through.
MiM158	6.2 Housing	6.2.100, pg.306	<p><i>Amend last part of para 6.2.100 to read:</i></p> <p>As such flexibility could be allowed where it can be shown that all reasonable options for provision have been considered. In these cases, the quality of any communal space will need to be particularly high to</p>	Clarity on how lower provision could be justified on more constrained sites, which might mean that the

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			show it can meet residents' needs. <u>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.</u> The calculation of amenity space does not include any parking, cycle or refuse and recycling storage areas.	standard cannot reasonably be achieved.
MiM159	6.2 Housing	6.2.100, pg.306, London Plan,	<i>Amend London Plan policy to read:</i> LONDON PLAN Policy D4 <u>6</u> Housing quality and standards	Consistency with London Plan – for clarity 4 has been struck through.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM160	6.4 Economy and town centres	6.4.9, pg.314	<i>Amend para 6.4.9 to read:</i> The <u>West London Employment Land Evidence</u> London Plan identifies <u>a need within Brent as having potential to provide for additional employment-industrial workspace floorspace capacity.</u> To achieve this, there will be a need to make better use of industrial sites and secure additional employment-industrial floorspace elsewhere. This will be through intensification of SIL and	Refer to Local evidence base. Clarity on industrial focus rather than more general employment.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			LSIS to increase plot ratio to a minimum of 0.65; seeking an increase in employment industrial floorspace on non-designated industrial sites; securing new employment industrial floorspace in Growth Areas and through the diversification of town centres.	
MiM161	6.4 Economy and town centres	6.4.10, pg.314	<p><i>Amend first sentence of para 6.4.10 to read:</i></p> <p>The London Plan also emphasises the importance of town centres and seeks to promote and enhance their vitality and viability to create hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, social infrastructure and residential development.</p>	To correct.
MiM162	6.4 Economy and town centres	After 6.4.10, pg.314-315, London Plan	<p><i>Amend London Plan policy to read:</i></p> <p>LONDON PLAN Policy E7 <u>Industrial</u> Intensification, co-location and substitution Policy SD8<u>7</u> Town Centres: Development principles and Development Plan Documents Policy SD7<u>8</u> Town Centres Network</p>	Consistency with London Plan
MiM163	6.4 Economy and town centres	6.4.11, pg.315	<p><i>Amend para 6.4.11 to read:</i></p> <p>The Granville in South Kilburn Growth Area is a good example of how workspace can support the local economy and foster a sense of community. The Granville is managed by South Kilburn Neighbourhood Trust, and was developed with support from the council</p>	Consistency with London Plan - Brent no longer provide capacity borough, local evidence base shows need for additional industrial floorspace. Includes

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>and Mayor of London. It provides an affordable range of enclosed office, shared studio and dedicated desk space, as well as training opportunities for local people. Opportunities for additional affordable workspace will be sought in South Kilburn, where it does not prejudice the wider programme to provide new social rented housing for existing secure tenants. Securing workspace in Growth Areas will contribute to creating vibrant places where people want to live. It will also be important to meet the London Plan requirement <u>need</u> for Brent to provide additional employment <u>industrial</u> floorspace. <u>The Brent Workspace Study has established a need for additional industrial workspace to meet local needs, especially in Growth Areas.</u> All major developments exceeding 3000 sq.m in <u>employment floorspace in the Growth Areas outlined above in Policy BE1</u> should provide a minimum of 10% affordable workspace in the B-use class <u>studio, makerspace and light industrial uses.</u> <u>Where a site is both a Growth Area and a SIL/LSIS requirements in Policy BE2 takes precedence.</u></p>	reference to local evidence base. Reflects use class changes.
MiM164	6.4 Economy and town centres	6.4.12	<p><i>Amend first part of para 6.4.12 to read:</i></p> <p>Affordable workspace is workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. Affordable workspace should be provided for</p>	Reflects use class changes and consistency with policy BE1. Grammar and consistency of terminology.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>start-up companies or in the form of 'move on' space for SMEs. B1(c) Light industrial floorspace will be prioritised to meet the identified need for this form of employment workspace in the borough. An Affordable Workspace Operator should be engaged at the earliest stage, before pre-application advice is sought, to ensure space is fit for purpose. The council's list of approved Affordable Workspace Operators seeking space in the borough is available at: www.brent.gov.uk/your-community/regeneration/affordable-workspace. If an operator is identified that is not on the list, they can apply to be registered. Affordable workspace will be secured for the lifetime of the development. The applicant should submit evidence of having consulted with an approved Affordable Workspace Provider <u>Operator</u> to determine the design of the space is suitable and that it is affordable, at no more than 50% of comparable local market rate.</p>	
MiM165	6.4 Economy and town centres	6.4.15, pg.316	<p><i>Amend para 6.4.15 to read:</i></p> <p>Brent Works provides developers and businesses support in training and recruitment. This benefits the business by helping to provide access to a skilled, local workforce. It also ensures local people benefit from the employment, apprenticeship and training opportunities development can bring. Major developments will be</p>	To correct to reflect policy BE1 and for clarity

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			required to produce an Employment, Apprenticeship and Training Plans will be required in line with guidance produced by Brent Works. Developers should engage with Brent Works at the earliest stage to discuss their needs.	
MiM166	6.4 Economy and town centres	6.4.18, pg.318	<p><i>Amend para 6.4.18 to read:</i></p> <p>6.4.18 The <u>evidence base supporting the London Plan, the London Industrial Land Demand Study (LILDS) identifies a significant need for additional industrial premises across West London in the period to 2041. For Brent (including parts of the borough where OPDC is the planning authority) it identifies the need for an equivalent of 46.9 hectares of additional industrial land. The West London Employment Land Evidence 2018 (WLELE) commissioned by west London boroughs, including Brent, reviewed the LILDS. The WLELE identifies that additional capacity is required, but for a much smaller amount of 0.6 hectares. Consistent with national policy and the London Plan, the Council has to plan to meet the need for additional capacity as a provide industrial capacity borough. Demand is identified for light industrial, general industry and storage and distribution uses floorspace, with increased need principally related to the logistics sector in</u></p>	Consistency with London Plan and reflective of evidence base. Provides certainty on the extent to which industrial floorspace provision will be sought and expectations on individual industrial areas consistent with revised wording for Policy BE2.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>the use classes B1c, B2 and B8. 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 delivering an to increase in industrial floorspace to support growth in business and employment.</p> <p><i>Add new para 6.4.18a to read:</i></p> <p><u>6.4.18a There is a large divergence in the results of LILDS and WLELE. In relation to the LILDS, the London Plan provides no specific industrial land needs target for Brent or the OPDC. Park Royal as the preeminent industrial location in West London, with the associated higher rents and development values is the most viable area in the borough and West London to accommodate the London Plan's emphasis on intensification of SIL. It is anticipated it will play a significant role in</u></p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>meeting the additional needs. Elsewhere the <u>viability of intensification purely for industrial purposes is less clear and will need further assessment, although for co-location with other development including residential, it is more encouraging. The Council will work closely with the OPDC who are producing their Local Plan and with the GLA to clarify the extent to which intensification in Park Royal will provide additional industrial capacity. This work will also need to involve LB Ealing as Park Royal is also within their borough and similar to Brent has OPDC as local planning authority and other boroughs/ stakeholders across west London if necessary. Notwithstanding this, within the area covered by this Local Plan Consistent with its 'provide capacity' status Brent the Council is committed to <u>delivering an exceeding this figure to increase in industrial floorspace to support growth in business and employment. Currently, many of the borough's industrial sites are underutilised and include non-industrial uses. London Plan policy E7 requires a Development in SIL and LSIS which are not identified as suitable for co-location in policy BE2 provides an opportunity for the market to intensify industrial floorspace to meet needs. In these locations, loss of industrial floorspace will be resisted. In</u></u></p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>designated industrial areas identified as appropriate for co-location an increase of industrial floorspace to achieve a plot ratio to 0.65 (0.65 sq.m. of floorspace for each 1 sq.m. of site area) or the re-provision of the existing amount of industrial floorspace, whichever is the highest, will be sought. Such intensification will be instrumental to increasing industrial floorspace in the borough. Additional capacity will also be secured by where possible increasing floorspace on non-designated industrial sites (policy BE3), and securing workspace in Growth Areas and secondary frontage of town centres (policy BE1 and BE4), and intensification of Park Royal which is being led by the OPDC. 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 in excess of the WLELE need, with a backstop position of not dropping below the 0.65 plot ratio within each defined industrial location.</u></p>	

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MiM167	6.4 Economy and town centres	6.4.19, pg.318	<p><i>Amend para 6.4.19 to read:</i></p> <p>The West London Employment Land Review (WLELR) identifies that whilst demand and viability will support intensification of industrial uses in some areas of SIL and LSIS, in others co-location is needed to incentivise intensification. Policy BE2 sets out Brent's approach to co-location and intensification based on an analysis of SIL and LSIS in the WLELR and Brent Industrial Land Audit. Policy BE2 is a starting point which identifies where co-location could be appropriate, but this would be subject to demonstrating the criteria in London Plan policy E7 could be achieved through a masterplan-led approach. Critically, it will need to be demonstrated that co-location would achieve a plot ratio of 0.65. The council will work with its partners to develop masterplans for Church End, Neasden and Staples Corner. Where masterplans are developer-led, the developer will need to work closely with the council and GLA from the outset. Masterplans will need to be produced in accordance with the GLA Practice Note: "Industrial intensification and co-location through plan-led and masterplan approaches".</p>	Brevity and consistency with naming of evidence base.
MiM168	6.4 Economy and town centres	6.4.20, pg.318	<p><i>Amend para 6.4.20 to read:</i></p> <p>In calculating what constitutes the minimum floorspace requirement required in any site's redevelopment</p>	Clarity on masterplan requirement, focus on industrial uses and

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>supported by a masterplan</u>, the existing employment industrial or warehousing floorspace or a plot ratio of 0.65 will be applied, whichever is the higher. Brent's employment areas contain a number of sui generis uses, such as trade merchants. These in the future could reasonably convert to other industrial uses to help meet demand for industrial, storage and warehousing. Therefore, for the purposes of calculating existing floorspace the council will include all floorspace within <u>office, research and development, light industrial, general industrial and storage and distribution</u> the B use class and closely related sui generis uses. Where a site has been long-term vacant or converted to uses which are not compliant with SIL and LSIS the level of floorspace will be based on plot ratio.</p>	changes to the Use Classes Order.
MiM169	6.4 Economy and town centres	6.4.21, pg.319	<p><i>Amend para 6.4.21 to read:</i></p> <p>Local Employment Sites are sites outside of SIL and LSIS in employment use within the B-use-class <u>office, research and development, light industrial, general industrial or storage and distribution</u> and 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.</u> They make an important contribution to the local economy, by providing local employment opportunities and reducing the need to travel. This policy <u>in recognition of the need for additional industrial</u></p>	Clarity on definition and extent to which they are required to support London Plan policy. Clarity following changes to the Use Classes Order.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>floorspace within the borough 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 allows for the release of unviable employment floorspace or, where appropriate, mixed-use development. This is consistent with the NPPF which requires the efficient use of land.</p>	
MiM170	6.4 Economy and town centres	6.4.22, pg.319	<p><i>Add sentence at the end of para 6.4.22 to read:</i></p> <p>It must be demonstrated that consideration has been given to alternative layouts and business uses, including smaller premises 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></p>	To clarify that employment floorspace provision will be sought where wholly employment use is unviable.
MiM171	6.4 Economy and town centres	6.4.23, pg.319	<p><i>Amend para 6.4.23 numbering and text to read:</i></p> <p>6.4.23 Under criterion b of Policy BE3, in exceptional circumstances a mixed-use development incorporating non-employment uses may be appropriate. The applicant must demonstrate that redevelopment will result in:</p> <p>a) <u>an increase in the amount of employment floorspace as defined in 6.4.21 on the site;</u></p>	Clarification on the definition and clarity following changes to the use classes order.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>a) the accommodation of the existing employment use, or all provides the increased workspace is provided as affordable <u>studio, research and development, light industrial or general industrial workspace with maker space in light industrial use prioritised</u> to meet development needs of businesses in Brent, particularly SMEs;</p> <p>b) an increase in the amount of employment floorspace on the site in the B use class;</p> <p>c) delivery of wider regeneration benefits to the community; and</p> <p>d) employment floorspace with a very strong prospect of being occupied.</p>	
MiM172	6.4 Economy and town centres	6.4.24, pg.319	<p><i>Amend para 6.4.24 to read:</i></p> <p>As evidence the employment space will be occupied the council will require a letter of agreement from the current employment use operating from the site stating their intent to occupy the proposed floorspace. Alternatively, where the current occupier has agreed to relocate <u>the additional employment floorspace should be provided as affordable workspace</u> should be provided for start-up companies or 'move on' space for SMEs. B1(c)-Light industrial floorspace will be prioritised to meet the identified need for this form of</p>	Clarity around extra floorspace requirements and Reflects changes to use classes order and relationship with affordable workspace in policy BE1.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			employment space in the borough. Brent's requirements for affordable workspace as set out in <u>Policy BE1 and supporting paragraph 6.4.12</u> apply.	
MiM173	6.4 Economy and town centres	6.4.25, pg.319	<p><i>Amend para 6.4.25 to read:</i></p> <p><u>For development of Local Employment Sites in areas with existing or emerging creative clusters, affordable workspace is to be provided on-site. This is These are</u> Harlesden, Wembley Growth Area, Willesden Green, Alperton Growth Area, Kilburn, Kensal Green, Neasden, Queen's Park, Burnt Oak Colindale Growth Area, and Church End Growth Area. Elsewhere in the borough if <u>the Council considers that there is no demand for workspace or that the space is unlikely to operate as affordable workspace over the longer term,</u> financial contributions will be secured to re-provide equivalent <u>affordable workspace employment floorspace elsewhere within existing or emerging creative clusters.</u></p>	Clarifies that the paragraph refers to Local Employment Sites, and places emphasis on the desirability of workspace in site as opposed to off-site contributions. To ensure that viable affordable workspace is provided that meets needs for the longer term.
MiM174	6.4 Economy and town centres	6.4.26	<p><i>Amend para 6.4.26 to read:</i></p> <p>Work-Live is the combination of living accommodation (<u>Use Class C3 defined as dwellinghouses in the use classes order</u>) with workspace (<u>office, research and development and light industrial uses Use Class B1, but not B2 or B8</u>) within a single self-contained unit. Applications for Work-Live development must be supported by a management plan agreed by the council</p>	Clarity on what is live work taking account of changes within the use classes order.

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			which demonstrates the units will be managed by an organisation committed to their long term management primarily for employment. An indicative ratio of 70:30 in favour of the work element will be sought.	
MiM175	6.4 Economy & Town Centres	BE4, pg.320	<i>Formatting:</i> "DIVERSITY OF USES" should not be the policy title but is a heading related to the policy wording below of: "No further...."	To correct
MiM176	6.4 Economy & Town Centres	6.4.28, pg.321	<i>Remove para 6.4.28:</i> The policy approach will also be applied in assessing permitted development prior approval applications for change of use of existing town centre uses. The proportion of frontage is to be calculated based on the length of the primary frontage in metres in the centre as a whole. A1 uses are shops, A2 uses are financial and professional services, A3 uses are restaurants and cafes, A4 are drinking establishments and A5 are hot food takeaways.	Justification for section of the policy no longer being taken forward, and Use Classes which no longer exist. Therefore needs to be removed.
MiM177	6.4 Economy & Town Centres	6.4.29, pg.321	<i>Amend first sentence of para 6.4.29 to read:</i> The policy outlines the council's approach to managing primary and secondary shopping areas <u>frontages</u> , town centre boundaries, and the mix of uses within frontages.	Use correct terminology.
MiM178	6.4 Economy & Town Centres	6.4.30, pg.322	<i>Amend first sentence of para 6.4.30 to read:</i>	Consistency with London Plan.

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			As referenced in the London Plan and Brent policy BHC4, the night time economy of Wembley has been identified as an area of National/ International importance, and those of, Cricklewood, <u>Kilburn</u> and Wembley Park as areas of more than local importance. It is therefore of special relevance to these centres that their leisure and entertainment functions are supported and enhanced.	
MiM179	6.4 Economy & Town Centres	6.4.32, pg.322	<p><i>Amend last sentence of para 6.4.32 to read:</i></p> <p>Where it is desirable to maintain an active frontage the strong preference will be conversion to workspace in the B1 use class (office, research and development or light industrial <u>workspace</u> compatible with a residential environment) at ground floor with residential above.</p>	Reflect changes to the Use Class Order.
MiM180	6.4 Economy & Town Centres	6.4.43, pg.324	<p><i>Amend para 6.4.43 to read:</i></p> <p>The need to prevent an over-concentration of takeaways is supported by national and regional policy as well as a growing evidence base. This is due both to health implications and to preserve the primary retail function of Brent's town centres. While it is acknowledged that takeaways provide a convenience service to local communities, the retail-based role of town centres must be preserved and so an upper limit of 6% of units in a centre's frontage being in A5 use takeaways has been</p>	Reflect changes to the Use Class Order.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			set as well as a restriction on any new A5-uses takeaways within the designated primary frontage of a centre.	
MiM181	6.4 Economy & Town Centres	6.4.44, pg.324	<p><i>Amend para 6.4.44 to read:</i></p> <p>In order to prevent an over-concentration of A5-uses takeaways within the secondary frontage of the borough's town centres there is a requirement to have no less than three non-A5-uses takeaways between takeaways. This will maintain a diverse and viable high street offer and restrict impacts on amenity.</p>	Reflect changes to the Use Class Order.
MiM182	6.4 Economy & Town Centres	6.4.45, pg.324	<p><i>Amend para 6.4.43 to read:</i></p> <p>London Plan Policy E9 places restrictions on development proposals containing A5-hot food takeaway uses. Any new A5-uses takeaway within 400 metres walking distance of an existing or proposed primary or secondary school should be refused.</p>	Reflect changes to the Use Class Order.
MiM183	6.4 Economy & Town Centres	6.4.46, pg.324	<p><i>Amend para 6.4.46 to read:</i></p> <p>Outside of town centres, neighbourhood parades and isolated shop units provide convenient access to goods and services which are needed on a day to day basis. To promote sustainable communities, the loss of retail and services <u>such</u> premises will be resisted in under-served areas.</p>	To reduce specificity to align with policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM184	6.4 Economy & Town Centres	6.4.47, pg.324-5	<p><i>Amend first part of para 6.4.47 to read:</i></p> <p>In determining applications for planning permission and change of use permitted development <u>to residential</u> prior approvals, development resulting in the loss of <u>ground floor local retail commercial, business</u> and service provision will not be permitted unless there is alternative equivalent provision within 400 metres. This is considered a reasonable walking distance (5 minutes for the average person) to access convenience shopping and local services. <u>In the context of prior approval permitted development, a 'Key Shopping Area' is considered to be any area within a designated town centre frontage or a neighbourhood parade, as defined on the policies map.</u></p>	More specific about losses of ground floor active uses consistent with change to use classes order. Provide definition to 'Key Shopping Areas' as outlined in the GPDO, providing consistency to prior approval consideration.
MiM185	6.4 Economy & Town Centres	6.4.48, pg.325	<p><i>Amend para 6.4.48 to read:</i></p> <p>To protect the viability of the remaining retail <u>commercial, business</u> and service units within a parade, consideration will be given as to whether or not the proposal incurs a breakage in the parade's frontage.</p>	To reflect use class changes.
MiM186	6.4 Economy & Town Centres	6.4.49, pg.325	<p><i>Amend para 6.4.49 to read:</i></p> <p>Where a loss of <u>commercial, business retail</u> or local service <u>to uses other than community uses</u> is allowed, the most appropriate alternative use would be housing. In considering applications for alternative uses, particular regard will be given to the possible effect on the</p>	To reflect use class changes and better reflect the policy.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			amenity of adjoining residential properties. The council's Shopfronts SPD3 (June 2018) provides further guidance on sympathetically converting shops to residential units.	
MiM187	6.4 Economy & Town Centres	BE9 Justification	<i>Move justification to after policy box.</i>	For structural clarity.
MiM188	6.4 Economy & Town Centres	Following 6.4.61, 328	<p><i>Amend list to read:</i></p> <p>EVIDENCE BASE</p> <ul style="list-style-type: none"> — Brent Employment Land Demand Study 2015, URS — Brent Workspace Study 2017, Regeneris — "West London Employment Land Review <u>Evidence</u> 2019, GL Hearn" — "West London Affordable Workspace Study, 2019 Avison Young" — Brent Retail & Leisure Need Assessment 2018, Urban Shape — "Brent Industrial Land Audit and Intensification Analysis 2019, Brent Council" 	To correct

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM189	6.5 Heritage & Culture	Title Page	<i>Amend chapter number to read:</i>	Correct chapter reference.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			"6.5 6.2' Heritage and Culture	
MiM190	6.5 Heritage & Culture	6.5.2, pg.330	<p><i>Amend para 6.5.2 to read:</i></p> <p>The council is preparing <u>has prepared</u> an Historic Environment Place-Making Strategy which will enable a programme of review of heritage assets within the borough.</p>	Factual update.
MiM191	6.5 Heritage & Culture	6.5.11, pg.333	<p><i>Amend para 6.5.11 to read:</i></p> <p>London Plan policy HC5 Supporting <u>London's</u> Culture and Creative Industries provides a sound overall basis on which to determine planning applications for the creation or loss of cultural facilities. It encourages boroughs to identify Creative Enterprise Zones, which was a Mayor initiative with associated funding. Brent bid for Willesden Green to be a Creative Enterprise Zone but was not successful. It is not clear if the Cultural Enterprise Zone initiative will continue. If it does the council may well seek to identify other areas where there is potential.</p>	Factual update.
MiM192	6.5 Heritage & Culture	6.5.13, pg.333	<p><i>Amend para 6.5.13 to read:</i></p> <p>In relation to pubs, <u>the Council wants to continue in seeking their protection or ensuring appropriate re-provision in developments.</u> from a planning policy perspective the existing Brent policy appears to be</p>	Brevity.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			working well. Whilst there is a draft London Plan which contains a policy that seeks to protect public houses, it is not considered to be as detailed and therefore as robust as Brent's, so it is proposed to essentially take Brent's existing policy forward in its current form.	
MiM193	6.5 Heritage & Culture	London Plan, pg.333	Amend London Plan policy to read: LONDON PLAN HC5 Supporting <u>London's</u> culture and creative industries	Factual update.
MiM194	6.5 Heritage & Culture	6.5.18, pg.334	Amend third sentence of para 6.5.18 to read: Its archaeological discoveries <u>to date</u> are scarce; sites have been built over and there are limited places where archaeologists could investigate.	Acknowledge uncertainty.
MiM195	6.5 Heritage & Culture	6.5.19, pg.334	Amend third sentence of para 6.5.19 to read: Policy BD4 <u>BHC1</u> therefore, specifically seeks to protect Brent's heritage.	Reference correct policy.
MiM196	6.5 Heritage & Culture	6.5.24, pg.335-6	Insert new para 6.5.24a after 6.5.24 to read: 6.5.24a It should be noted designation as a Locally Listed Building does not provide further statutory protection <u>where it is not in a conservation area</u> but it draws attention to the <u>special architectural, historic, streetscape and</u>	To better reflect the distinction in approach to designated and non-designated heritage assets. To be consistent with national policy and legislation.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>design</u> qualities of the building. <u>Development proposals that affect non-designated heritage assets will be required to demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset. Planning permission may be granted in cases where a proposal could result in harm to or loss of a non-designated heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance. Where it is accepted by the Local Planning Authority that demolition is acceptable, recording of the heritage asset should be undertaken and submitted alongside development proposals. Replacement buildings should draw upon the heritage elements of the previous design that made it significant within a suitable time frame. This may include the special qualities listed above.</u></p>	
MiM197	6.5 Heritage & Culture	6.5.26, pg.336	<p><i>Add new sentence at the end of para 6.5.26 to read:</i></p> <p>Where development is proposed for a site which includes or has the potential to include heritage assets with archaeological interest, developers must submit an appropriate desk-based assessment and, where</p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			necessary, a field evaluation in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works. Applicants should consult with Historic England's Greater London Archaeological Advisory Service in order to determine the scope of the archaeological requirements.	
MiM198	6.5 Heritage & Culture	6.5.27, pg.336	<p><i>Amend para 6.5.27 to read:</i></p> <p>London Plan Policy HC3 Strategic and Local Views requires local plans to clearly identify important local views. It advises boroughs to use the principles of HC4 London View Management Framework for the management of local views.</p>	Correct policy reference.
MiM199	6.5 Heritage & Culture	6.5.29, pg.337	<p><i>Add new sentence at the beginning of para 6.5.29 to read:</i></p> <p><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.</u> London Plan policies and associated Supplementary Planning Guidance set out the key principles and methodology for information that needs to be supplied to support development proposed</p>	Provides clarity on how protected views can be addressed by neighbouring planning authorities when determining planning applications.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			which could impact on views and the key considerations in determining whether it is acceptable.	
MiM200	6.5 Heritage & Culture	After 6.5.32, pg. 337	<i>Amend London Plan policies to read:</i> LONDON PLAN Policy HC3 Strategic and Local Views Policy HC4 London View Management Framework	Correct policy reference.
MiM201	6.5 Heritage & Culture	6.5.38, pg.340	<i>Add new sentence at the end of para 6.5.38 to read:</i> In addition, due to the contribution public houses make to the borough's local character and distinctiveness, policy BHC1 Brent's Heritage Assets will normally apply. <u>Whilst pubs have been in decline overall, in some other parts of London, with the increase in popularity of 'craft beers' new pubs have also more recently opened. Should there be sufficient commercial interest in opening new pubs in Brent, the Council would be supportive, in accordance with the national 'sequential test' prioritising their location within town centres.</u>	Reflects proposed modification to policy.
MiM202	6.5 Heritage & Culture	6.5.39 , pg.340	<i>Amend part a) of para 6.5.39 to read:</i> a) the public house has been marketed for 24 months as a public house and for an alternative local community facility, at a price agreed with the council following an independent professional valuation (paid for by the	Reflects priority to retain the pub use, then community uses and also changes in Use Class Order under which community facilities now

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			developer) and there has been no interest in either the free-or lease-hold either as a public house <u>in the first instance</u> or as a community facility <u>for provision of medical or health services, crèche, day nursery or day centre or learning and non-residential institutions</u> falling within 'D1' use class ;	fall across a wider range of use classes.

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MiM203	6.6 Green Infrastructure and Natural Environment	6.6.2, pg. 343	<i>Amend para 6.6.2 to read:</i> Brent currently has 103 public parks, which are of various sizes and typologies. They cover 463 hectares, equivalent to 1.39 hectares per 1,000 population. <u>This is well above the national FiT (Fields in Trust) target of 0.8 hectares of parks and gardens per 1000 population.</u> If the current level of provision per person were to be maintained, an additional 86.4 hectares of public parks would be required to 2041.	Clarity to better reflect the evidence-base.
MiM204	6.6 Green Infrastructure and Natural Environment	6.6.10, pg.344	<i>Amend para 6.6.10 to read:</i> Brent's existing blue infrastructure or Blue Ribbon Network, includes the <u>Lower River</u> Brent , Grand Union Canal – <u>Paddington Arm</u> and ,Welsh Harp, Wealdstone	Clarity and factual correction on named blue infrastructure

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Brook, Brent Feeder Canal and Dollis Brook and <u>Upper Brent</u> . Water quality is of 'moderate' status in all waterbodies. This is as a result of pollution and physical modification from development, transport and the water industry. The ' <i>Brent River Corridor Improvement Plan</i> ' seeks to ensure that rivers are of a 'good' status to support wildlife. The Grand Union Canal runs through an area of open space deficiency in the borough and is an important route in linking to other open spaces.	
MiM205	6.6 Green Infrastructure and Natural Environment	Evidence Base, pg.344	<i>Add in list of evidence base:</i> <u>Open Space, Sports and Recreation Study 2019</u>	Correction
MiM206	6.6 Green Infrastructure and Natural Environment	After Evidence Base, pg.344	<i>Add after list of evidence base to read:</i> <u>OTHER GUIDANCE</u> <u>Biodiversity Metric 2.0. DEFRA/ Natural England</u> <u>Biodiversity net gain. Good Practice Principles for Development. A Practical Guide CIRIA/CIEEM/IEMA</u>	Support for recognised guidance by Natural England/ Environment Agency.
MiM207	6.6 Green Infrastructure and Natural Environment	6.6.22, pg.347	<i>Amend first sentence of para 6.6.22 to read:</i> The council's Food Growing and Allotments Strategy <u>2012</u> recommended that opportunities for temporary food growing are pursued. Integration of food growing opportunities into new major residential developments will be sought, taking into consideration the demand for provision within the area.	Clarity

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MiM208	6.6 Green Infrastructure and Natural Environment	6.6.24, pg.348	<p><i>Amend para 6.6.24 to read:</i></p> <p>In order to meet open space standards <u>identified in 'Shaping Neighbourhoods: Play and Informal Recreation' Supplementary Planning Guidance</u>, on-site provision will be required. The amount will be consistent with the policy <u>Where this cannot be achieved, a financial contribution in lieu will be required to ensure suitable provision through new or improved open space elsewhere. The level of contribution sought will be identified and take account of other guidance such as 'Shaping Neighbourhoods: Play and Informal Recreation' Supplementary Planning Guidance.</u> Management and maintenance of new open spaces needs to be considered from the start of the design process.</p>	Clarity
MiM209	6.6 Green Infrastructure and Natural Environment	6.6.25, pg.348	<p><i>Amend para 6.6.25 to read:</i></p> <p>The Open Space, Sport and Recreation Study (2019) sets standards to ensure <u>that reflect that there is</u> adequate open space provision across the borough. It sets open space requirements for each Growth Area. Outside of these, major <u>residential</u> developments within wards which now or through population growth will not achieve minimum standards of open space deficiency provision (i.e. Alperton, Brondesbury Park, Dudden Hill, Harlesden, Kensal Green, Kilburn, Mapesbury, Queens Park, Queensbury, Tokyngton Wembley Central or</p>	Clarity

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Willesden Green Ward) <u>should seek to maximise the opportunities on site to create publicly accessible open space with a range of sizes and for a range of users achieve 0.81 sqm of on-site publicly accessible open space per resident</u>. Major <u>residential</u> development in other wards <u>with adequate provision</u> should seek to <u>provide achieve 0.81 sqm of publicly accessible open space provision based on the need generated by the development per resident</u> unless the site is within 400 metres (by the most direct safe walking route to the nearest access point) of an existing publically accessible open space of a larger typology than can be provided on site, as identified on the policies map.</p>	
MiM210	6.6 Green Infrastructure and Natural Environment	6.6.26, pg.348	<p><i>Amend para 6.6.26 to read:</i></p> <p>In both cases it may be acceptable for the council's residential private amenity standard of <u>50sqm per home for family housing (3 bedrooms or more) situated at ground floor level and 20 sqm for all other housing 20 sqm minimum per dwelling or 50 sqm for a family home (3 bedrooms or more)</u> to be off-set against any proposed on site publicly accessible open space, subject to a minimum of <u>5 sqm London Plan standards of private amenity space</u> being provided for each dwelling. Where on site provision of publicly accessible open space is not feasible, the council will seek S106 contributions for enhancements to the quality of spaces taking account of</p>	Reflects modifications to policy BH13 and variable London Plan minimum private amenity space standards depending on dwelling size.

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			the recommendations from the qualitative assessment that was carried out by Keep Britain Tidy in 2018.	
MiM211	6.6 Green Infrastructure and Natural Environment	6.6.28 , pg.349	<p><i>Amend part a) of para 6.6.28 to read:</i></p> <p>a) Location and security – easily accessible by non-car means. Contribute to a sense of security by applying the principles of London Plan Policy D4011 'Safety, security and resilience to emergency'</p>	Correction consistent with London Plan
MiM212	6.6 Green Infrastructure and Natural Environment	6.6.30 , p.349	<p><i>Amend para 6.6.30 to read:</i></p> <p>6.6.30 In developments adjoining the borough's Blue Ribbon Network the council will pursue opportunities to improve public accessibility and its setting, both in relation to buildings and public realm. It should be noted that <u>as a result of the Environmental Permitting (England and Wales) (Amendment) (No2) Regulations 2016 a permit may be required for certain development adjacent to within 8m of a main river or its tributaries. As such, is required by the Environment Agency to have usually seek a minimum set back of 8m. Where existing set back is greater than 8m the higher distance ideally this should be maintained. This applies to all rivers and specifically to River Brent and Wealdstone</u></p>	Clarity around the 8m set back adjacent to main river watercourses and watercourses with heritage value.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p>Brook. This setback enables ease of general waterway maintenance, helps to create a sense of openness, protecting and offering the opportunity for the enhancement of habitats for wildlife. It also enables opportunity for sustainable and cost effective flood risk management options. Early engagement with the Environment Agency, where applicable, is advised.</p> <p><i>Add new para 6.6.30a after 6.6.30 to read:</i></p> <p><u>6.6.30a 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 Brent and create a reservoir, an artificial lake, in order to guarantee a</u></p>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<p><u>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></p>	
MiM213	6.6 Green Infrastructure and Natural Environment	6.6.31, pg.349-50	<p><i>Amend to add new sentence at beginning of para 6.6.31 to read:</i></p> <p><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.</u> The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. The appropriate setback for development adjacent to the canal will be established by an assessment of the character and context. This will also need to balance the protection and enhancement of biodiversity and the multiple needs of the users of canal and towpath. In Brent, development adjacent to the Grand Union Canal</p>	Clarity and Factual correction.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			in particular provides an opportunity to create new towpaths, public open spaces and access points. Early engagement with the Canal and River Trust for schemes adjoining the Grand Union Canal, <u>Welsh Harp</u> and the Brent Canal Feeder is advised.	
MiM214	6.6 Green Infrastructure and Natural Environment	6.6.34, pg.350	<i>Amend first sentence of para 6.6.34 to read:</i> The Water Framework Directive is a European Union Directive which commits all member states <u>are required 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.</u>	Factual correction in line with Environment Agency requirement
MiM215	6.6 Green Infrastructure and Natural Environment	6.6.35, pg.350	<i>Amend first sentence of para 6.6.35 to read:</i> In Brent <u>all</u> waterside developments and other developments which could negatively impact on water quality,	Strengthen.
MiM216	6.6 Green Infrastructure and Natural Environment	6.6.38, pg.351	<i>Amend and add new sentence to para 6.6.38 to read:</i> Consistent with London Plan Policy G7 Trees and Woodlands the council strongly encourages the retention of trees on development sites. If trees are located on or adjacent to a site, applicants should carry out a Tree Survey. The survey will need to accord to the standards set out in BS 5837 <u>Trees in relation to construction – Recommendations</u> . It should inform the design and layout of the development to ensure the long	Clarity and better reflection of requirement

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			term retention of as many existing high and moderate quality trees as possible and should accord with the hierarchy of Avoid-Mitigate-Compensate. Where it is agreed with the council that the retention of trees is not possible, re-provision should be made on site of equivalent canopy cover. Where agreed to not be feasible, a contribution to off-site tree planting for equivalent canopy cover will be required. <u>Total canopy area of existing trees proposed to be removed will be measured from the tree survey. Developers should make proposals for new trees which, at time of planting, provide an equivalent canopy area to those removed. Taking account of the right species, wildlife value, planting location, availability of space, aftercare and growing conditions. This will need to be evidenced in the ecology assessment.</u>	
MiM217	6.6 Green Infrastructure and Natural Environment	6.6.39, pg.351	<i>Amend second last sentence of para 6.6.39 to read:</i> BS 8545:2014 <i>Trees: from nursery to independence in the landscape</i> - <u>recommendations</u> should be used when choosing landscaping and devising management plans for trees within developments.	Accuracy
MiM218	6.6 Green Infrastructure and Natural Environment	6.6.43, pg.352	<i>Amend para 6.6.43 to read:</i> The council does not yet have full knowledge of the existing tree stock, and its quantified environmental and economic benefits. Developing a database such as i-tree	Update

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			Eco will provide a base line and enable setting future targets and a focus on tree deficient areas. The council has recently developed an existing tree stock database informed by the i-tree Eco survey to quantify the borough's existing tree stock's environmental and economic benefits.	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM219	Sustainable Infrastructure	6.7.5, pg.355	<p><i>Amend para 6.7.5 to read:</i></p> <p>Flooding can have major economic and social impacts on the borough's residents, 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 experienced major flooding <u>from its brooks and rivers</u>, with the most recent events (2007 and 2010) occurring on the highway, open spaces and gardens. The Policies Map shows areas of the borough that are subject to fluvial and surface water flooding.</p>	Reference types of flooding as sought by Environment Agency.
MiM220	Sustainable Infrastructure	6.7.9, pg.355	<p><i>Add new sentence to para 6.7.9 to read:</i></p> <p><u>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</u></p>	To identify added priority given to climate change by the Council in 2019.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			actions that will be taken in Brent to address climate <u>change</u> . In terms of clean generation, carbon reduction/energy efficiency and construction emissions, the council will aim to ensure all major developments accord with the London Plan's policy objectives meeting renewable energy standards on site. There will be the wider delivery of established district wide CHP systems within the Wembley and South Kilburn Growth Areas. In addition, new district heating networks will be sought within the remaining Growth Areas.	
MiM221	Sustainable Infrastructure	6.7.20, pg.358	<i>Amend para 6.7.20 to read:</i> Policy SI2 of the London Plan requires major developments to be net zero-carbon, which is to be achieved through minimising carbon emissions in accordance with the energy hierarchy: Be Lean, Be Clean, and Be Green <u>and Be Seen</u> . The carbon reduction targets should be met on-site. Only where it is clearly demonstrated carbon reduction targets cannot be fully met on site, any shortfall may be off-set through local carbon offsetting.	Consistent with London Plan
MiM222	Sustainable Infrastructure	6.7.34, pg.361	<i>Amend second last sentence of para 6.7.34 to read:</i> The West London SFRA provides more detail of the requirements for <u>Flood Risk Assessments</u> (FRAs) undertaken to support development proposals in Brent. In accordance with national policy the sequential test will	Clarity

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			be applied to ensure development is steered to areas with the lowest probability of flooding.	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM223	6.8 Transport	6.8.6, pg.368	<p><i>Amend para 6.8.6 to read:</i></p> <p>The council will work closely with its partners including TfL, the West London Alliance and WestTrans to improve public transport access for all across Brent. A key priority is to improve orbital links from east to west through the West London Orbital (WLO) rail link. The link would use the existing Dudding Hill freight line to create an overground passenger line connecting Hounslow in the west to Hendon and West Hampstead in the east via Old Oak Common (Cross rail Elizabeth Line, Great Western Mainline and High Speed 2 stations), Harlesden, Church End, Neasden and Brent Cross West (Thameslink station). It will also be important that strong pedestrian links are created from surrounding stations into the borough. 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 the</p>	Factual

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			regeneration of Old Oak, being led by the Old Oak and Park Royal Development Corporation, is a key opportunity to improve connections from Harlesden to Old Oak and secure a much needed upgrade to Willesden Junction station. In addition, the council will continue to work with bus operators to improve coverage to key destinations and interchange facilities. It will be important that public transport is accessible to all, with step free access to overground and underground stations a key priority. Step free access will be introduced at Brondesbury Park and Queen's Park Stations and feasibility work is being undertaken for Northwick Park.	
MiM224	6.8 Transport	6.8.14, pg. 372	<i>Amend second sentence of para 6.8.14 to read:</i> This includes mitigation on smalls scale schemes where issues are not caused by levels of generated traffic, but by poor design.	Typo
MiM225	6.8 Transport	6.8.16, pg.374	<i>Amend 'para 6.8.16 to read:</i> London Plan policies T6 – T6.5 address parking and provide associated parking standards. For uses not covered by London Plan policy, local standards are set out in Appendix 4. The requirements for electric charging points and cycle parking are set out in London Plan policyies <u>T5</u> and <u>T6-T6.1</u> . A proportion of electrical	Consistency with the London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			charging points should be publicly accessible to all road users at all times to encourage greater use.	
MiM226	BT2	6.8.17, pg.374	<p><i>Amend first part of para 6.8.17 to read:</i></p> <p>The amount of parking provided in accordance with parking standards is a balance between a number of factors. These include seeking to reduce unnecessary car trips, promoting effective use of land, urban design and environmental quality, making development viable and not creating on street parking pressure which undermines quality of life. The standards promote fewer spaces in locations better served by public transport. The emphasis is on not trying to <u>only providing</u> spaces where they are unnecessary. <u>The starting point should always be a 'car-free' development.</u> Opportunities for car free development might include locations close to public transport interchanges where space for parking is constrained.</p>	Grammar and to reflect London Plan policy T6- Car Parking
MiM227	BT2	After 6.8.19, pg.374	<p><i>Amend 'National & London Plan' policies to read:</i></p> <p>NATIONAL & LONDON PLAN London Plan Policy T6 Car parking Emerging Design of Car Parking, TfL</p>	Consistency with remainder of Plan and removal of guidance that has not been taken forward.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM228	7 Delivery and Monitoring	7.1.6, pg.381	<p><i>Amend para 7.1.6 to read:</i></p> <p>The council in the Plan has sought to plan as best as it can to meet housing needs. As identified by the council's evidence base, there is a chronic need for affordable housing. This is well beyond the private sector's and planning policy's ability through S106 planning obligations to assist delivery thorough cross subsidisation <u>subsidy</u> on development sites. Realistically the deficit can only be addressed through greater public sector investment than is currently available to Registered Providers (housing associations) and the council. The council will nevertheless continue through looking at the potential of its own housing estate, but also through direct provision through an arm's length delivery vehicle (<u>company name: I4B</u>) in assisting delivery.</p>	Grammar and supplementary information
MiM229	7 Delivery and Monitoring	7.1.8 , pg.381	<p><i>Amend first sentence of para 7.1.8 to read:</i></p> <p>The London Plan identifies the risk associated with the delivery of new strategic transport projects and on-going funding for supporting and expanding existing services.</p>	Correct spelling
MiM230	7 Delivery and Monitoring	7.1.15, pg.382	<p><i>Add new sentence at the end of para 7.1.15 to read:</i></p> <p><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</u></p>	Acknowledge cross-boundary working/ provision as identified by OPDC

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
			<u>CCG will work with adjoining boroughs (and OPDC) and relevant CCGs to ensure suitable and timely provision of necessary facilities.</u>	
MiM231	7 Delivery and Monitoring	7.1.18, pg.384	<p><i>Amend last sentence of para 7.1.18 to read:</i></p> <p>As in many cases this is non-statutory work, it is likely to be subject to increased budgetary pressures, which will result in amendments to management regimes and different ways of trying seeking to support their continued high quality provision.</p>	Grammar corrections

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
MiM232	Appendix 2	Pg.389	<u>SCHEDULE THAT SHOWS HOW LONDON PLAN DESIGN POLICY AND BRENT SPD1 DESIGN PRINCIPLES ARE INTER RELATED</u>				To provide greater clarity on what the Appendix is for.
MiM233	Appendix 2	Pg.389	London Plan policy (amended Jul 2018)	SPD1 guidance (adopted Nov 2018)	SPD1 principles	London Plan policy	Reflects final policy numbering of London Plan.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
			D4B3 OPTIMISING SITE CAPACITY THROUGH THE DESIGN- LED APPROACH	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D4B3, D89, G1	
				3.1 Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D4B3, D46, D89	
				3.2 Animated facades	Development should ensure active frontage and maximise doors and windows to active ground floor rooms.	D4B3, D46	
				3.3 Urban grain	New development should respect existing urban grain and human scale.	D1,	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				3.4 Roofscape	Building roofs should be designed to minimise the impact of height and positively respond to the character of the area.	D1,	
				3.5 Proportions	Buildings, including window dimensions and void-mass ratio, should be well proportioned; respecting local character.	D1	
				3.6 Building materials	Building materials should be durable, attractive and respect local character.	D1	
				4.1 Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D46, D78	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				4.2 Parking	New developments should provide a suitable amount of parking in a mix of parking solutions that are convenient, efficient and facilitate good urban design.	D1, D 7 <u>8</u>	
				4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D 7 <u>8</u> , G5, G7	
				4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D 7 <u>8</u> , G5	
				4.5 Public realm	Street design and public realm should reflect the street hierarchy and accommodate for movement and the street as a place accordingly.	D1, D 7 <u>8</u>	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D78, G1	
			D46 Housing quality and standards	3.1 Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D4B3, D46, D89	
				3.2 Animated facades	Development should ensure active frontage and maximise doors and windows to active ground floor rooms.	D4B3, D46	
				4.1 Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D46, D78	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				5.1 Privacy and amenity	New development should provide adequate privacy and amenity for new residents and protect those of existing ones.	D46	
				5.2 Private outdoor space	New development should provide good levels of private outdoor space and well-designed communal amenity space for new residents.	D46	
				5.3 Bins and bike storage	Services, bin and bike storage, should be designed as part of the building envelope wherever possible; minimising visual impact on the streetscene.	D46	
				5.4 Space standards	New development should provide adequate space, access and orientation and adhere to the relevant space standards.	D46	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				5.5 Lighting and noise	Buildings and spaces should be designed to minimise potential noise and light pollution.	D46	
			D78 Public realm	4.1. Block structure and active frontage	New development should create well-dimensioned perimeter blocks wherever possible, providing active frontage and maximising sunlight into amenity space.	D1, D46, D78	
				4.2 Parking	New developments should provide a suitable amount of parking in a mix of parking solutions that are convenient, efficient and facilitate good urban design.	D1, D78	
				4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D78, G5	
				4.5 Public realm	Street design and public realm should reflect the street hierarchy and accommodate for movement and the street as a place accordingly.	D1, D78,	
				4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D78, G1	
			D89 Tall buildings	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D4B3, D89, G1	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				3.1. Density, height and massing	New development height, massing and facade design should positively respond to the existing context and scale; facilitating good urban design.	D1 <u>83</u> , D4 <u>6</u> , D8 <u>9</u>	
			G1 Green infrastructure	2. Context and Character	Development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment.	D1, D8 <u>9</u> , G1	
				4.6 Larger sites	Larger sites should integrate with their surroundings and provide a clear network of routes, views, open space and landscape.	D1, D7 <u>8</u> , G1	
			G5 Urban greening	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D7 <u>8</u> , G5, G7	

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed				Reason for Modification
				4.4 Front gardens	New dwellings should have green front gardens wherever possible; taking into account existing context and character.	D1, D78, G5	
			G7 Trees and woodlands	4.3 Trees	New development should provide suitable trees to new streets and spaces and retain existing trees where possible.	D1, D78, G5, G7	
MiM234	Appendix 4	Pg.393	<u>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.</u>				Provides greater clarity on link between Appendix 4 and the Policy BT2.
MiM235	Appendix 4	8.4.1, Pg.393	Parking standards for <u>Class E(g)(i) uses</u> or B1a uses as set out in the London Plan policy T6.2 apply in Brent. For other employment uses in the B <u>and Class E(g)(ii) and Class E(g)(iii)</u> use class or closely related sui generis uses, the following standards, as detailed in Table 1, should be applied.....				Reflects changes in use class order 2020 whilst retaining use classes as identified in

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
				the London Plan policy.
MiM236	Appendix 4	Pg.393, 8.4.5 c)	one coach parking space should be provided for every 50 <u>75</u> bedrooms.	Correction
MiM237	Appendix 4	Pg.394, 8.4.9	<p>Parking for non-residential institutions (D4)</p> <p>This category covers places of worship, health centres, nurseries and museums, all with varying parking requirements. For all D4 <u>non-residential institution</u> uses, up to 1 car parking space may be provided per 10 users/visitors on site at any one time.....</p>	Reflects changes in use class order 2020 whilst retaining reference to non-residential institutions as these uses are now split across different use classes.
MiM238	Appendix 5	Pg.395	<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.

Modification Number	Chapter/Policy Number	Paragraph Number or Section	Modification Proposed	Reason for Modification
MiM239	Appendix 5	Pg.395, 8.5.1	A1 <u>E(a)</u> Retail For A1 retail units less than 500m2 gross floor area, one transit sized bay for service vehicles should be provided.	Reflects changes in use class order 2020
MiM240	Appendix 5	Pg.395, 8.5.3 Heading	A3 <u>E(b)</u> Food and Drink Establishments	Reflects changes in use class order 2020
MiM241	Appendix 5	Pg.395, 8.5.4 Heading	B1 <u>E(g)</u> Business	Reflects changes in use class order 2020

**SCHEDULE OF MODIFICATIONS TO THE POLICIES MAP OF DRAFT BRENT LOCAL PLAN SUBMITTED FOR EXAMINATION IN MARCH
2020**

LONDON BOROUGH OF BRENT

All proposed modifications and their reference numbers supersede all previous versions proposed by the Council during the examination process.

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 1	None	West London Waste Plan (WLWP) 3 Location of Waste Development – existing waste management sites.	Identify safeguarded waste sites as set out in the West London Waste Plan - Alperton	To provide clarity on sites that have associated policies in the West London Waste Plan
Map Mod 2	None	West London Waste Plan (WLWP) 3 Location of Waste Development – existing waste management sites.	Identify safeguarded waste sites as set out in the West London Waste Plan – Mount Pleasant	To provide clarity on sites that have associated policies in the West London Waste Plan
Map Mod 3	None	West London Waste Plan (WLWP) 3 Location of Waste Development –	Identify safeguarded waste sites as set out in the West London Waste Plan – Neasden	To provide clarity on sites that have associated policies in the West London Waste Plan

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
		existing waste management sites.		
Map Mod 4	None	West London Waste Plan (WLWP) 3 Location of Waste Development – existing waste management sites.	Identify safeguarded waste sites as set out in the West London Waste Plan – Wembley Hannah Close	To provide clarity on sites that have associated policies in the West London Waste Plan
Map Mod 5	None	West London Waste Plan (WLWP) 3 Location of Waste Development – existing waste management sites.	Identify safeguarded waste sites as set out in the West London Waste Plan – Wembley Fourth and Fifth Way	To provide clarity on sites that have associated policies in the West London Waste Plan
Map Mod 6	5.1 Central	BCGA1	Identify Wembley Opportunity Area with a boundary consistent with the Wembley Growth Area.	Provide clarity on Wembley Opportunity Area for associated London Plan policies.
Map Mod 7	5.1 Central	BCSA4	Edit site allocation boundary	Remove waste site from site boundary to add to BCSA9
Map Mod 8	5.1 Central	BCSA6	Edit site allocation boundary	Site boundary changed to remove completed development site.
Map Mod 9	5.1 Central	BCSA7	Edit site allocation boundary	Boundary changed to divide into 2 separate site allocations, creating a new allocations BCSA20
Map Mod 10	5.1 Central	BCSA9	Edit site allocation boundary	Site boundary changed to add the waste site from BCSA4
Map Mod 11	5.1 Central	BCSA17	Remove site allocation boundary	Site is within SIL so to be consistent with BE2 is not suitable for mixed use development allocation.

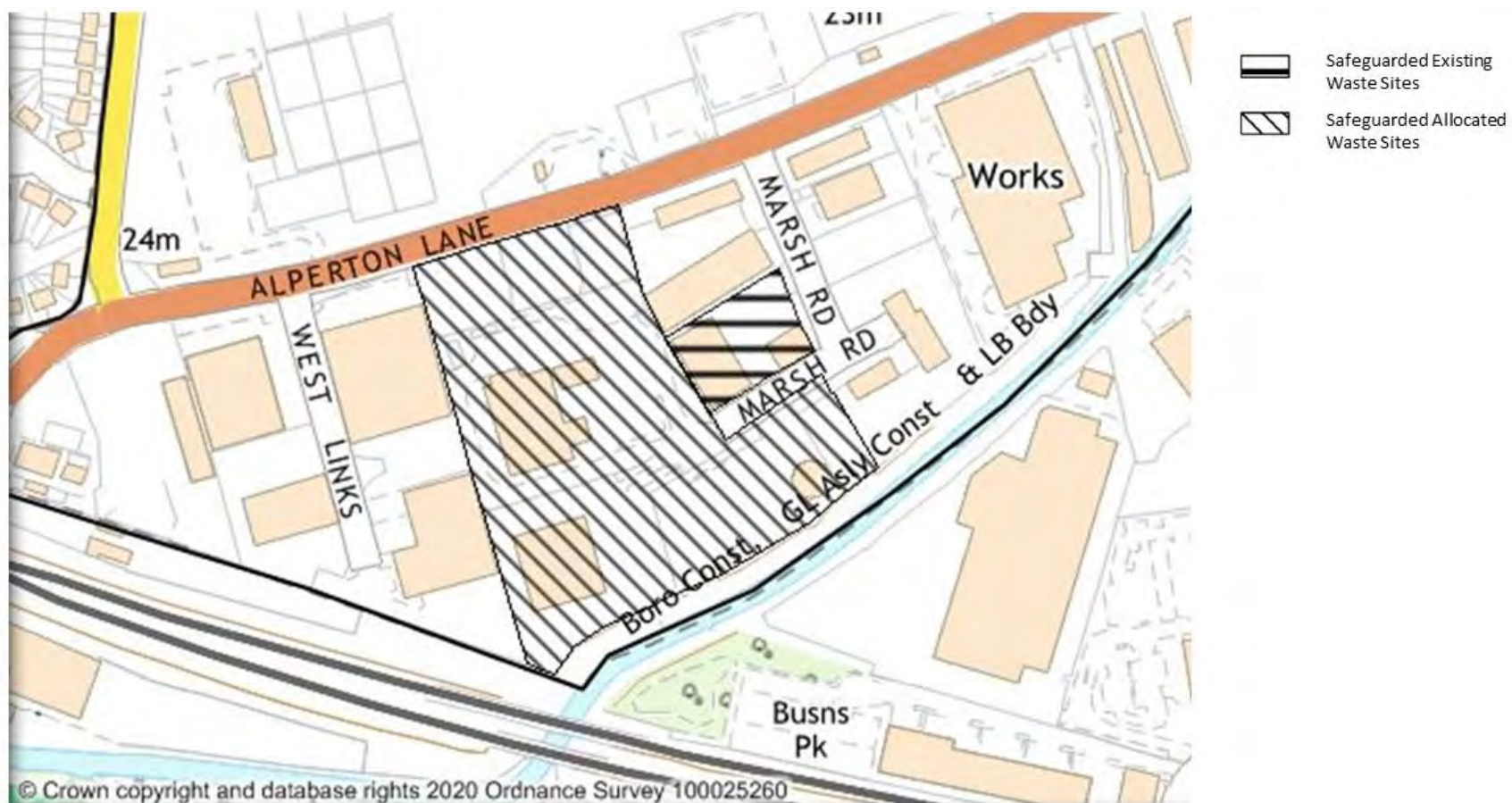
Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 12	5.1 Central	BCSA20	Add site allocation boundary	A new allocation BCSA20 which was formerly part of BCSA7
Map Mod 13	5.2 East	BEGA1A	Add boundary of new Neasden Growth Area policy.	To provide map for new Growth Area policy boundary.
Map Mod 14	5.2 East	BEGA1	Amend from former Growth Area boundary showing separate sites to one contiguous site allocation boundary.	To provide clarity on the site allocation boundary and reflecting separation from new Growth Area policy BEGA1A
Map Mod 15	5.3 North	BNGA1	Identify Burnt Oak Colindale 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 16	5.7 South West	Local Green Space designation – Vale Farm	Removal of residential back gardens incorrectly included in the boundary.	Residential gardens not consistent with Local Green Space definition.
Map mod 17	5.7 South West	Open Space designation – Vale Farm	Removal of residential back gardens incorrectly included in the boundary.	Residential gardens not consistent with open space definition.
Map Mod 18	6.1 Design	BD2 – Tall Building Zones	Include Northfields and other parts of the Alperton Growth Area within the Alperton Tall Buildings Zone, remove the Core, and add appropriate heights	To reflect existing tall building consents and revised Tall Buildings Strategy for the Zone and Core is not referenced in Policy BD2. Include appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.
Map Mod 19	6.1 Design	BD2 – Tall Building Zones	Burnt Oak/Colindale Tall Building Zone Remove the Core Designation, and add appropriate heights	Core is not referenced in Policy BD2. Include

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
				appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.
Map Mod 20	6.1 Design	BD2 – Tall Building Zones	Neasden Tall Building Zone Remove the Core Designation, and add appropriate heights	Core is not referenced in Policy BD2. Include appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.
Map Mod 21	6.1 Design	BD2 – Tall Building Zones	Northwick Park Tall Building Zone Remove the Core Designation, and add appropriate heights	Core is not referenced in Policy BD2. Include appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.
Map Mod 22	6.1 Design	BD2 – Tall Building Zones	South Kilburn Tall Building Zone Remove the Core Designation, and add appropriate heights	Core is not referenced in Policy BD2. Include appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.
Map Mod 23	6.1 Design	BD2 – Tall Building Zones	Staples Corner Tall Building Zone Remove the Core Designation, and add appropriate heights	Core is not referenced in Policy BD2. Include appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.

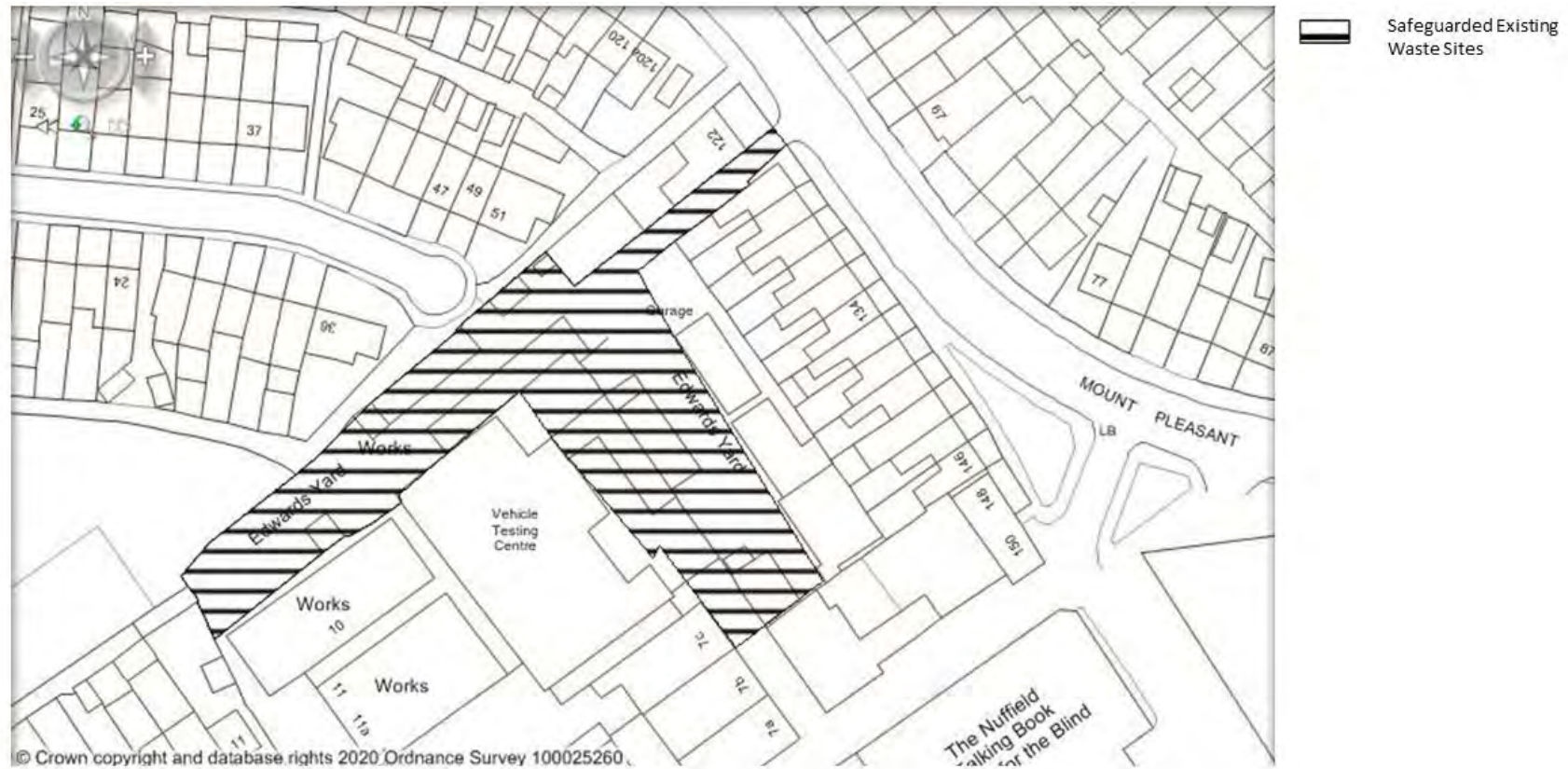
Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
Map Mod 24	6.1 Design	BD2 – Tall Building Zones	Stonebridge Tall Building Zone Remove Core Designation, extend the Zone but also take account of OPDC boundary and add appropriate heights	Core is not referenced in Policy BD2 and reflecting changes to BD2 removing flexibility for tall buildings outside zones. Removes part that previously encroached into OPDC area where the borough is no longer local planning authority. Include appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.
Map Mod 25	6.1 Design	BD2 – Tall Building Zones	Wembley Tall Building Zone Remove Core Designation and extend the Zone, and add appropriate heights	Core is not referenced in Policy BD2 and reflecting changes to BD2 removing flexibility for tall buildings outside zones. Include appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.
Map Mod 26	6.1 Design	BD2 – Tall Building Zones	Wembley Park Tall Building Zone Remove the Core Designation, and add appropriate heights	Core is not referenced in Policy BD2. Include appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.
Map Mod 27	6.1 Design	BD2 – Tall Building Zones	Add Kilburn Square Tall Building Zone Designation, and add appropriate heights	Reflecting changes to BD2 removing flexibility for tall buildings outside

Policy Map Change	Chapter	Policy	Modification Proposed	Reason for Modification
				zones. Include appropriate heights as identified in the Tall Building Strategy and required by London Plan policy.
Map Mod 28	6.1 Design	BD2 – Tall Building Zones	Remove Tall Buildings Zone Pinnacle - Wembley	Pinnacle is not referenced in Policy BD2
Map Mod 29	6.1 Design	BD2 – Tall Building Zones	Remove Tall Buildings Zone Pinnacle – Burnt Oak	Pinnacle is not referenced in Policy BD2
Map Mod 30	6.2 Housing	BH2 - Intensification Corridors	Remove existing intensification corridors and replace with new intensification corridors notation taking account of Intensification Corridors Justification Paper	Remove specific site boundaries and replace with line to show the corridors as identified by Intensification Corridor justification paper.
Map Mod 31	6.4 Economy & Town Centres	BE2	Amend boundary of Northfields East 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 32	6.4 Economy & Town Centres	BE2	Amend Wembley Strategic Industrial Location boundary.	Ikea and Tesco removed as long standing existing retail uses and not justified as Strategic Industrial Location designation.

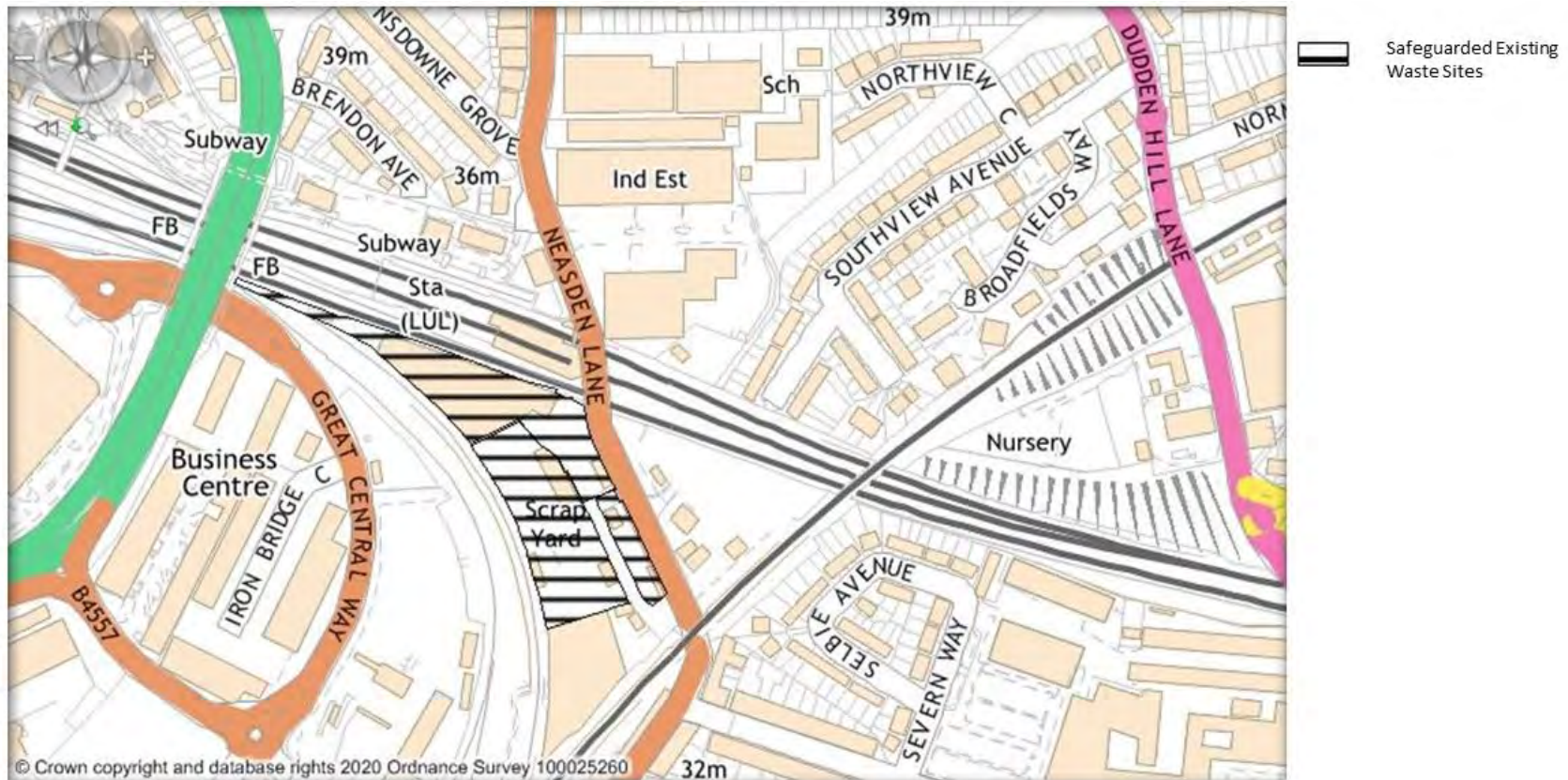
Map Mod 1 Identify Safeguarded Waste Sites as set out in the West London Waste Plan – Alperton



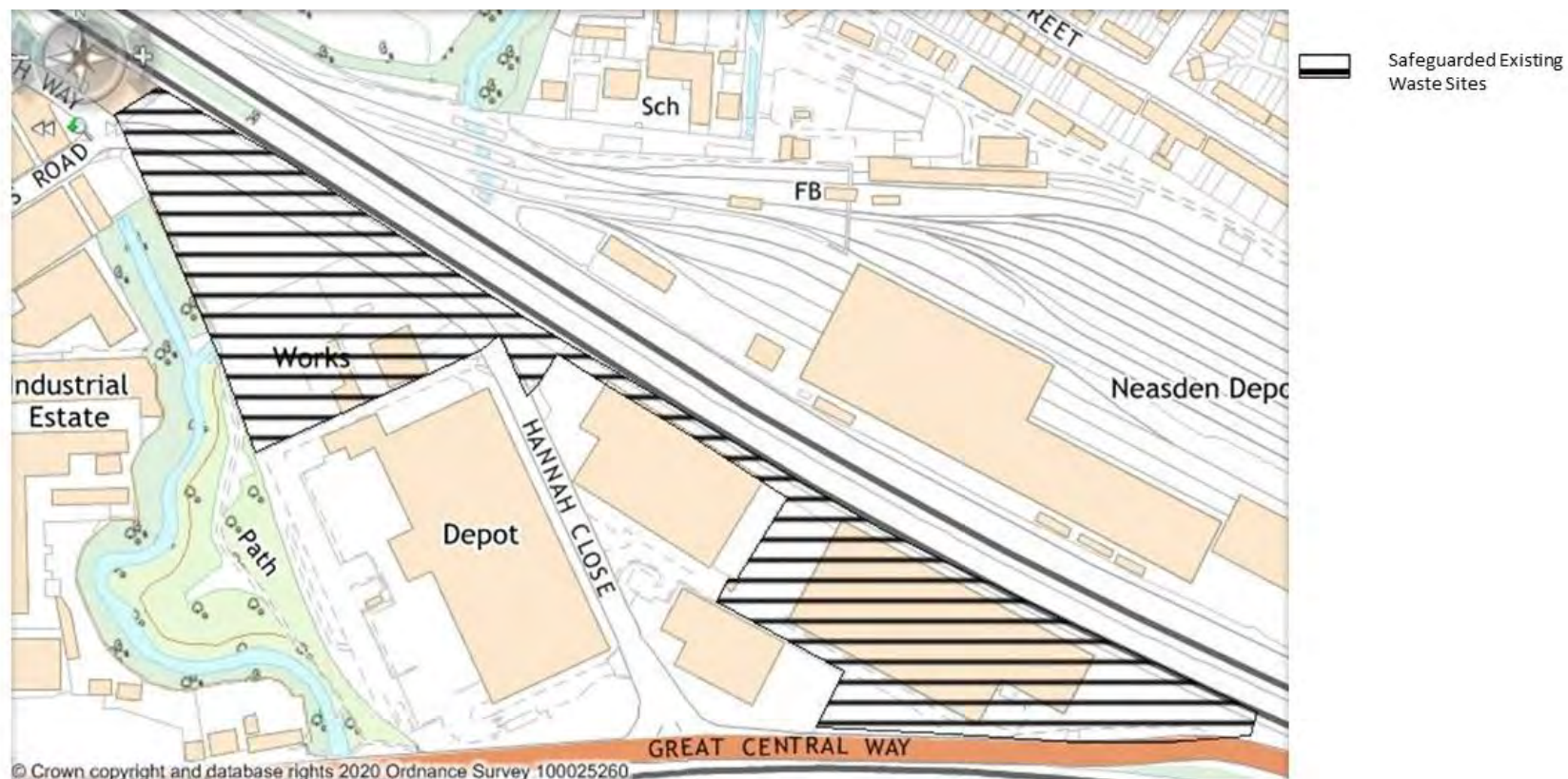
Map Mod 2 Identify Safeguarded Waste Sites as set out in the West London Waste Plan – Mount Pleasant



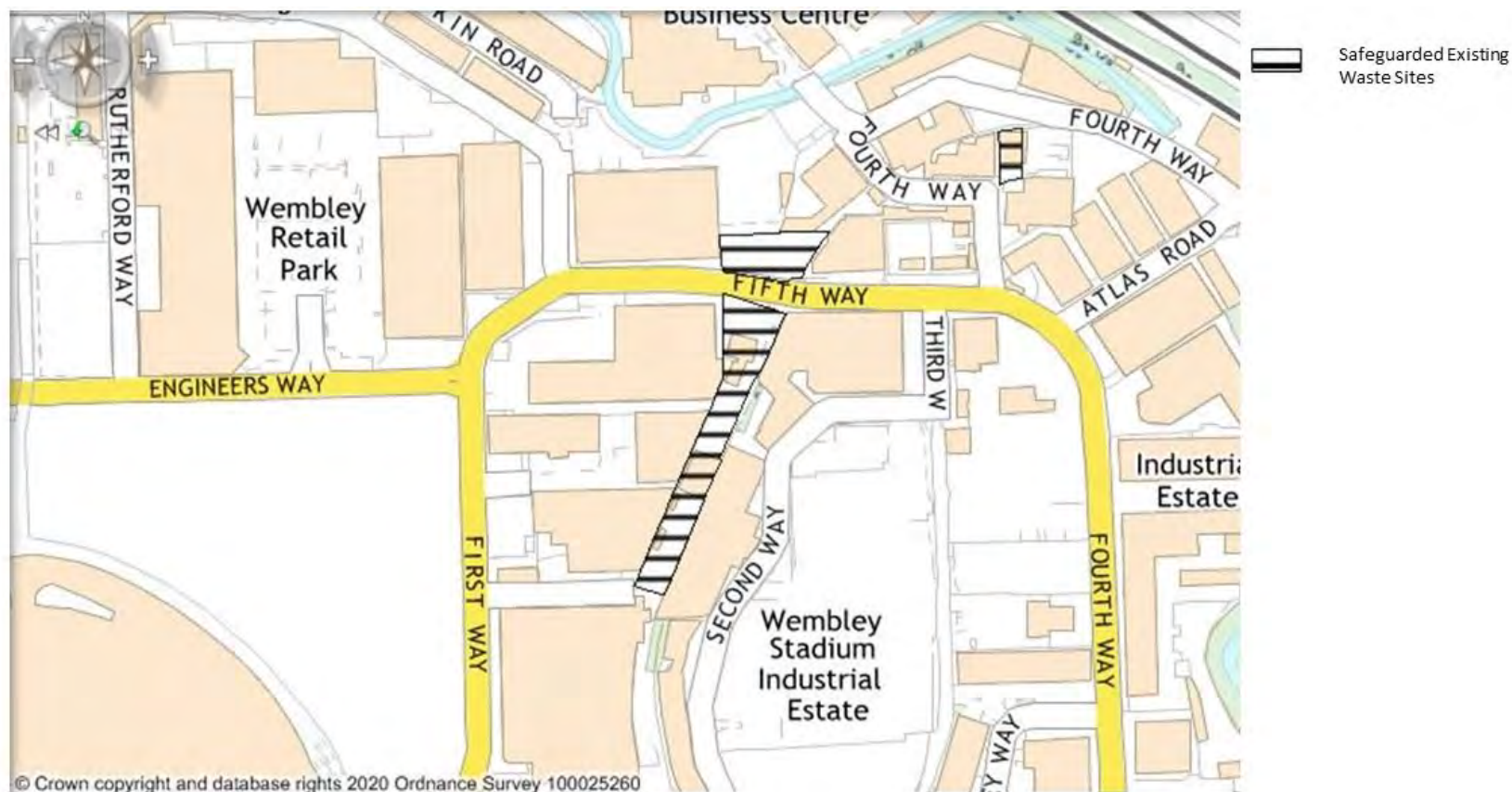
Map Mod 3 Identify Safeguarded Waste Sites as set out in the West London Waste Plan – Neasden



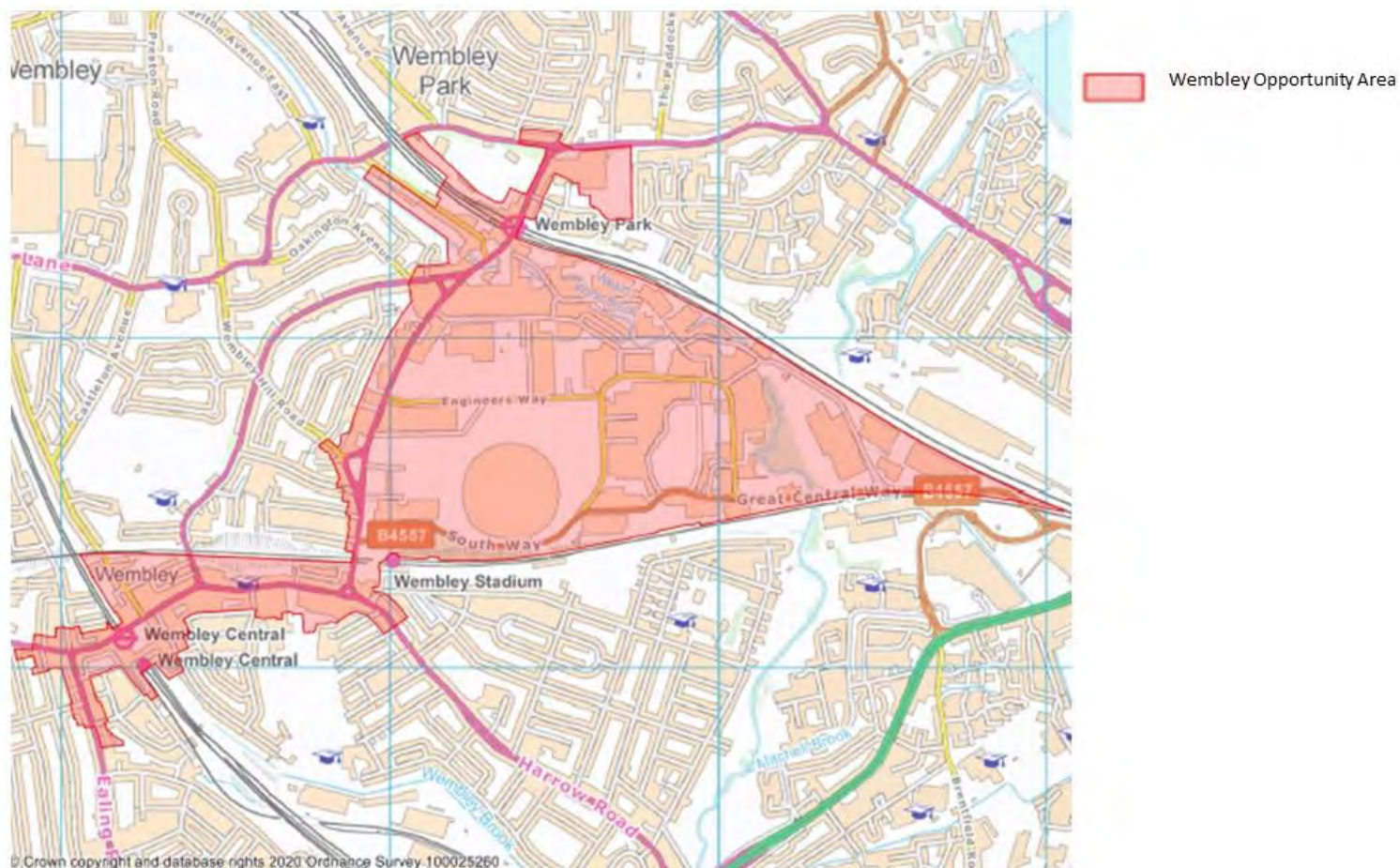
Map Mod 4 Identify Safeguarded Waste Sites as set out in the West London Waste Plan – Wembley Hannah Close



Map Mod 5 Identify Safeguarded Waste Sites as set out in the West London Waste Plan – Wembley Fourth and Fifth Way

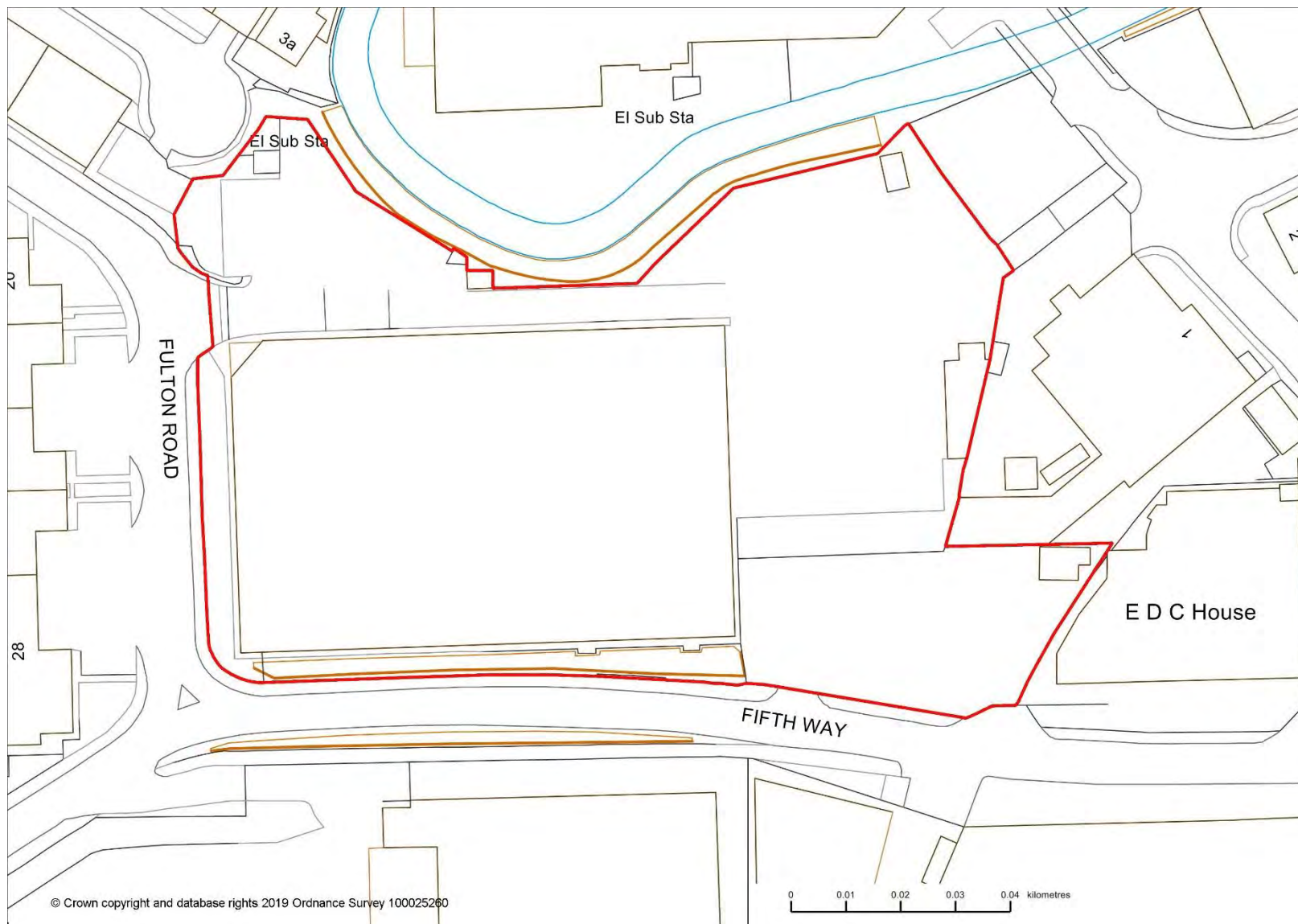


Map Mod 6 Identify Wembley Opportunity Area with a boundary consistent with the Wembley Growth Area.



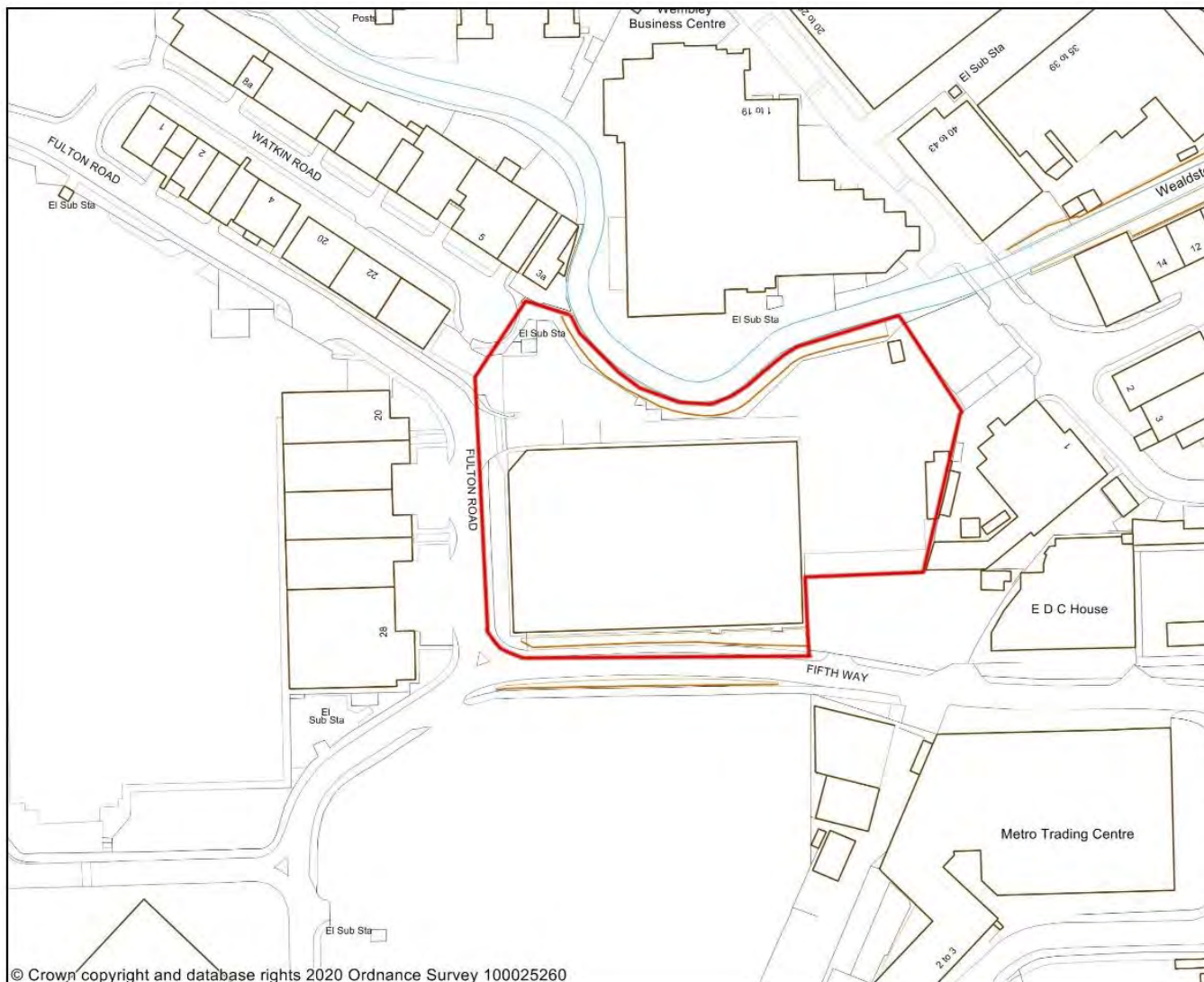
Map Mod 7 Edit boundary of BCSA4 to remove boundary of waste site to be added to BCSA9.

Before



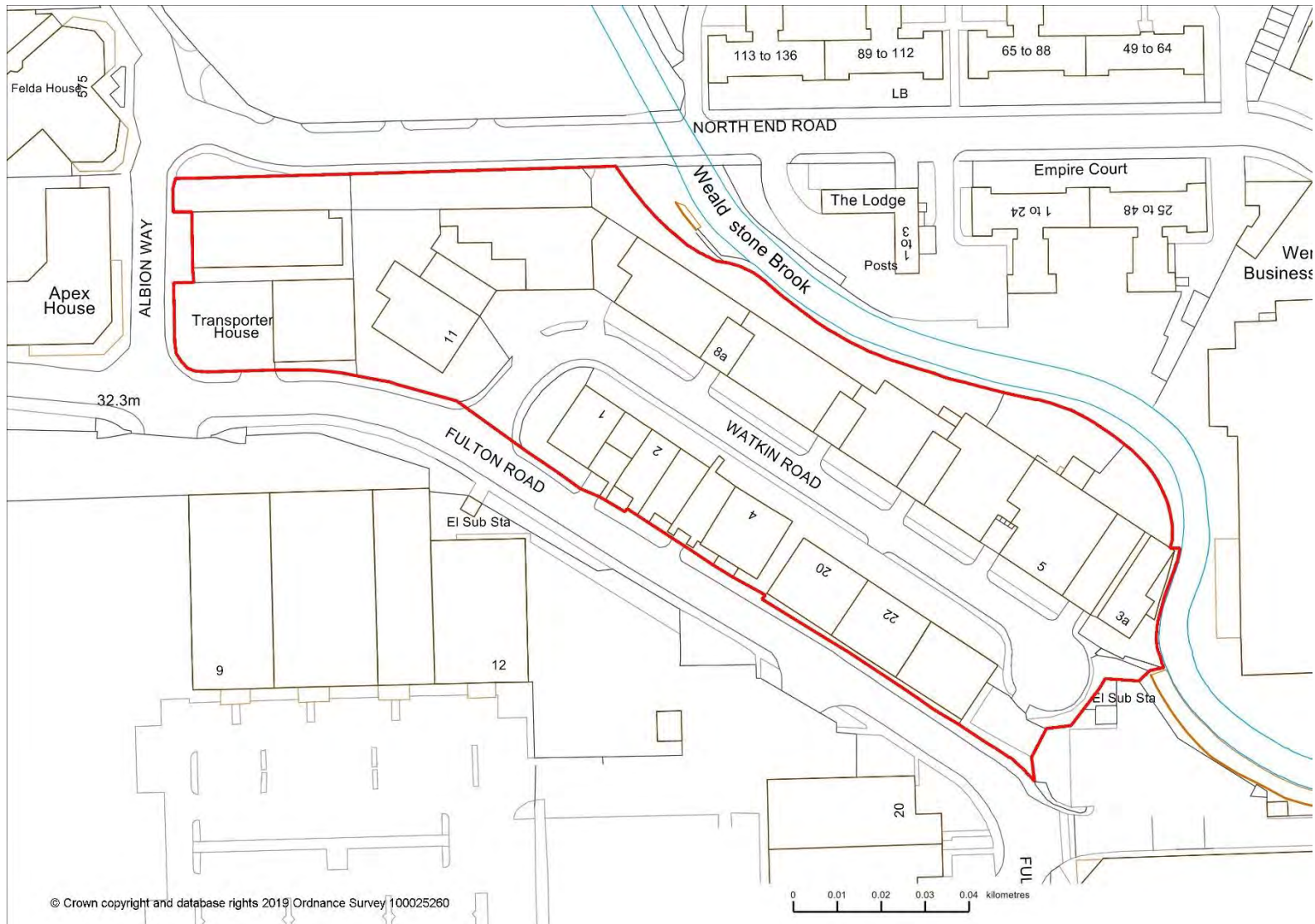
Map Mod 7 Edit boundary of BCSA4 to remove boundary of waste site to be added to BCSA9.

After



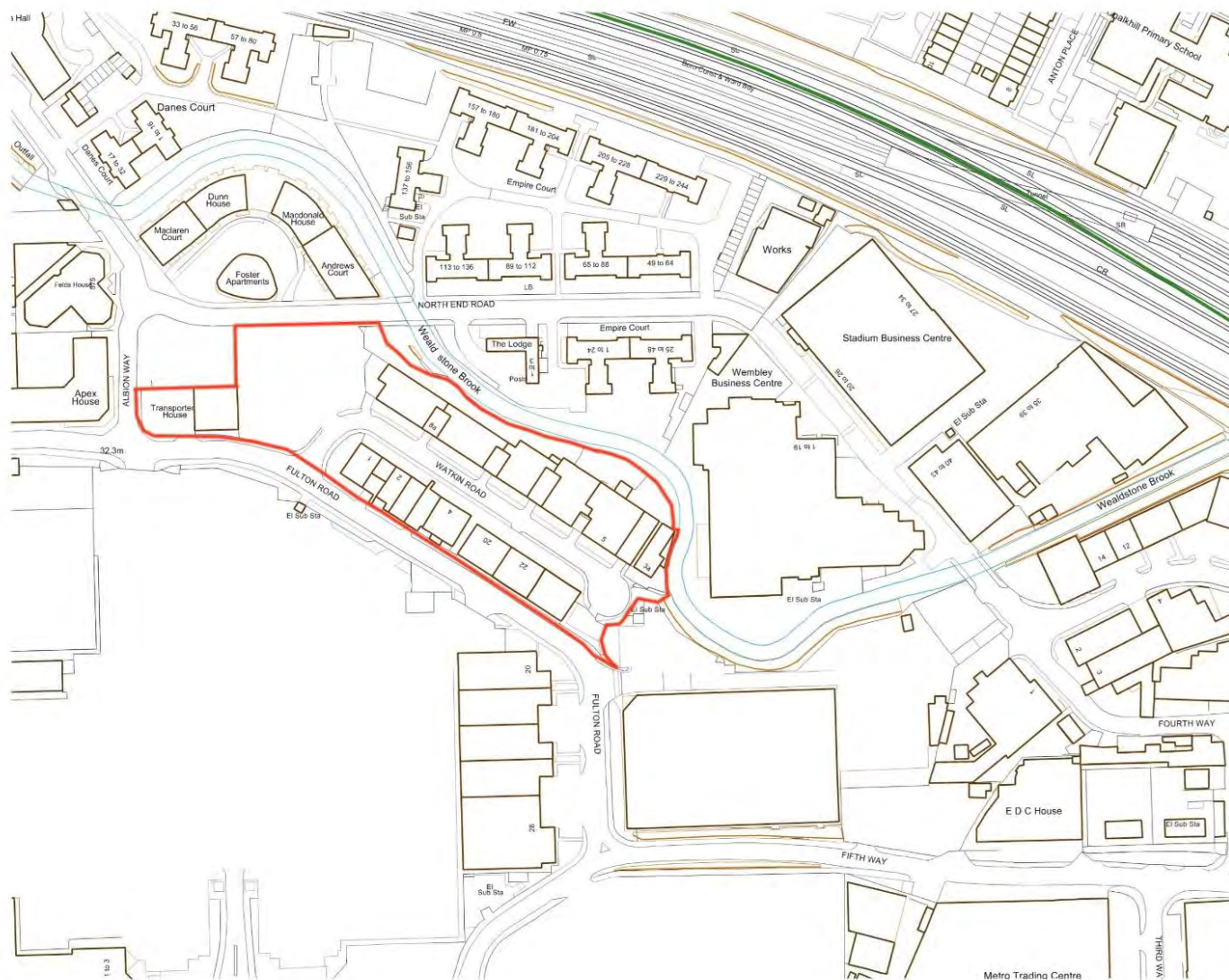
Map Mod 8 Edit boundary of BCSA6 to remove boundary of completed development site.

Before



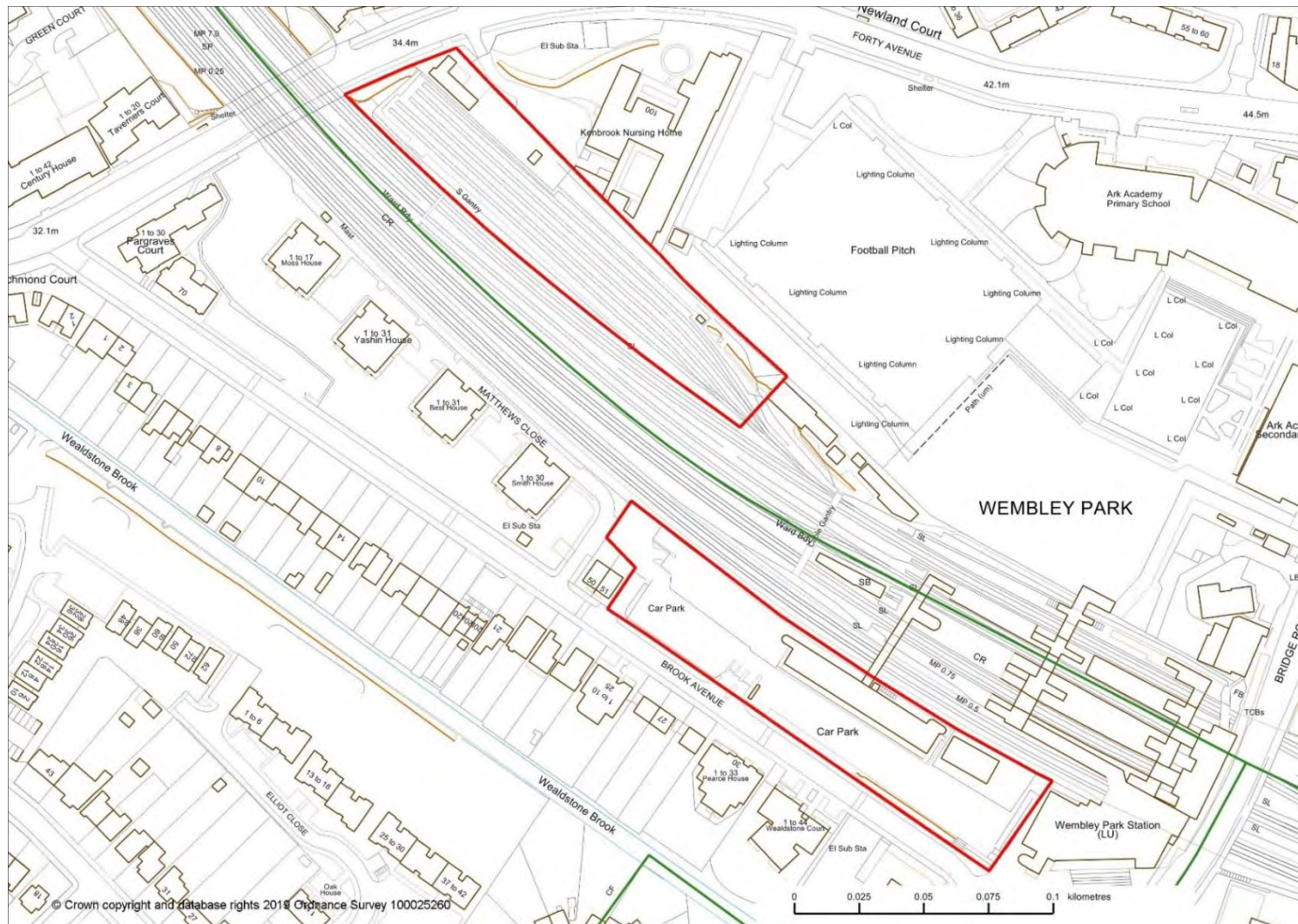
Map Mod 8 Edit boundary of BCSA6 to remove boundary of completed development site.

After



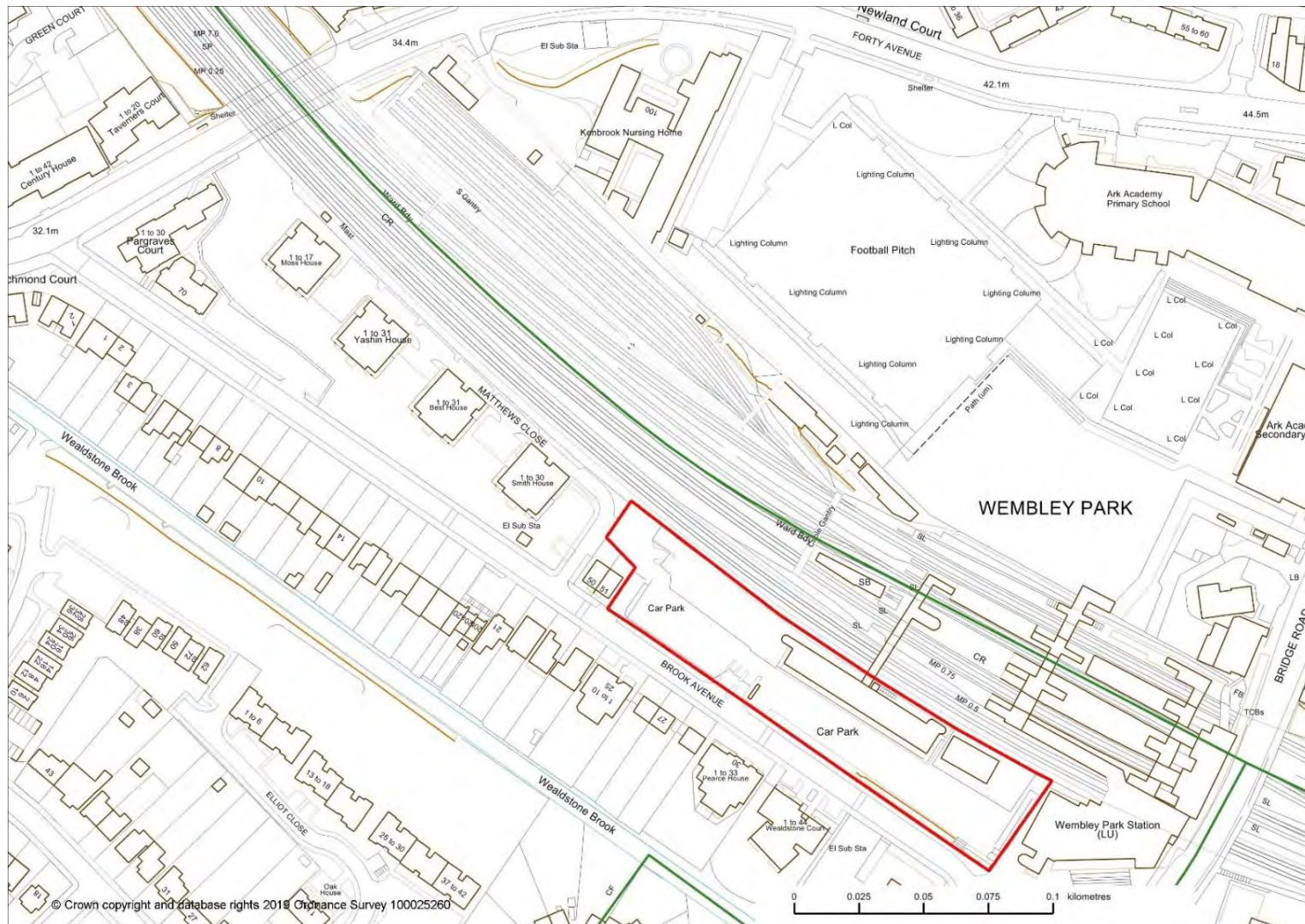
Map Mod 9 Edit boundary of BCSA7 to remove boundary of northern development area which will be a separate allocation BCSA20.

Before



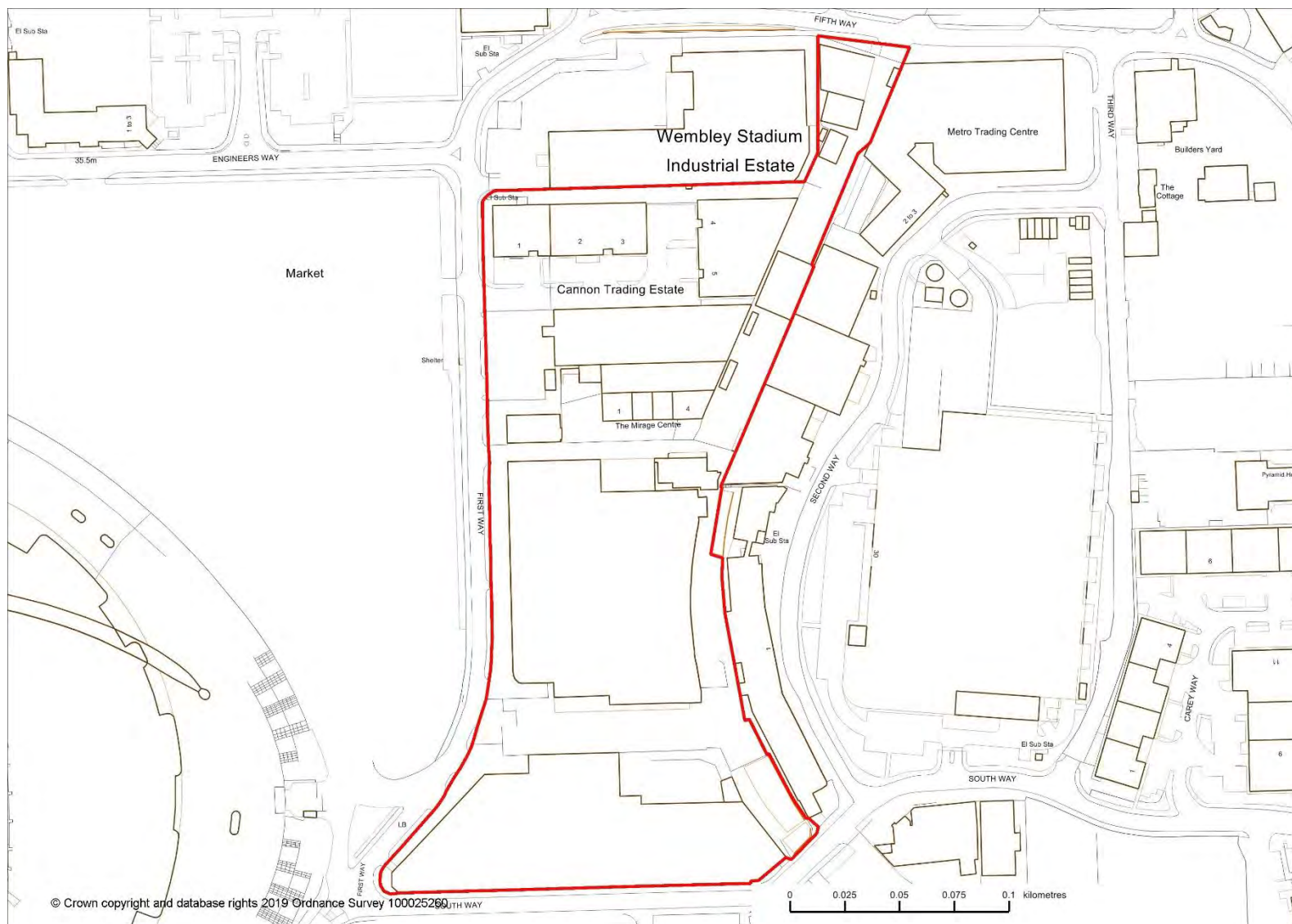
Map Mod 9 Edit boundary of BCSA7 to remove boundary of northern development area which will be a separate allocation BCSA20.

After



Map Mod 10 Edit boundary of BCSA9 to add waste site from BCSA4.

Before



After

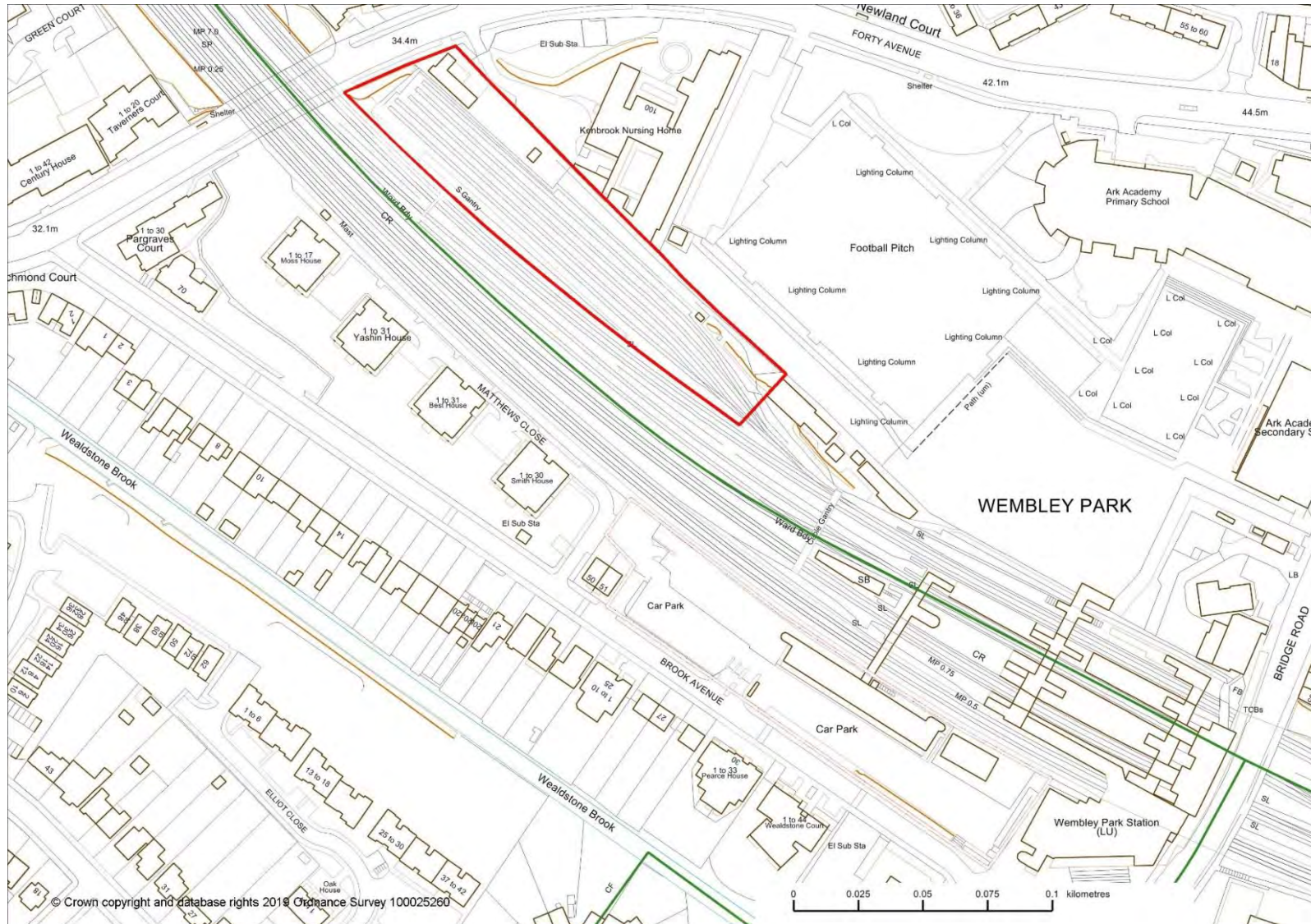


Map Mod 11 Remove BCSA17 shown as a Site Allocation Boundary from the Map.

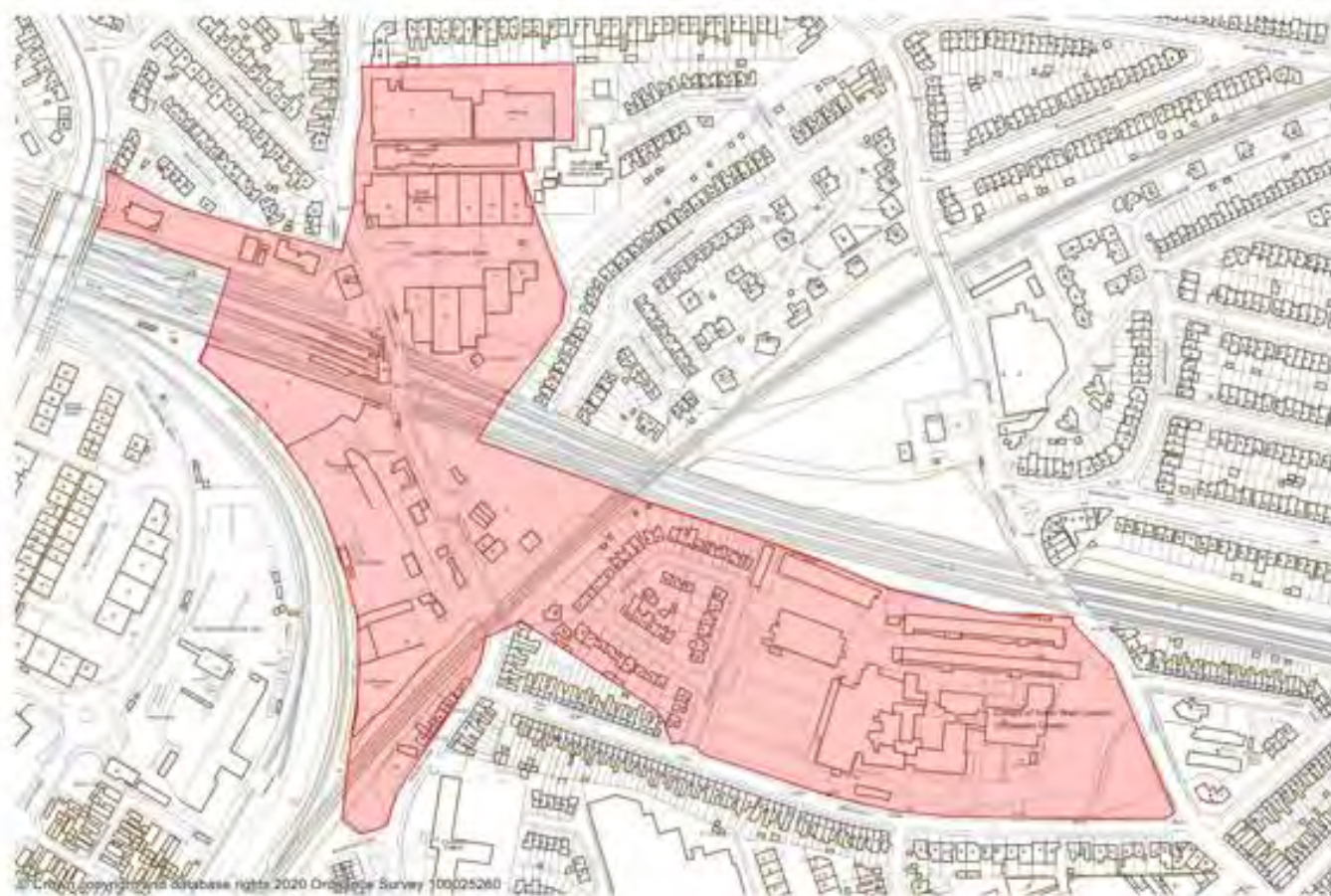


Map Mod 12 Add site Allocation BCSA20 (formerly part of BCSA7).

After



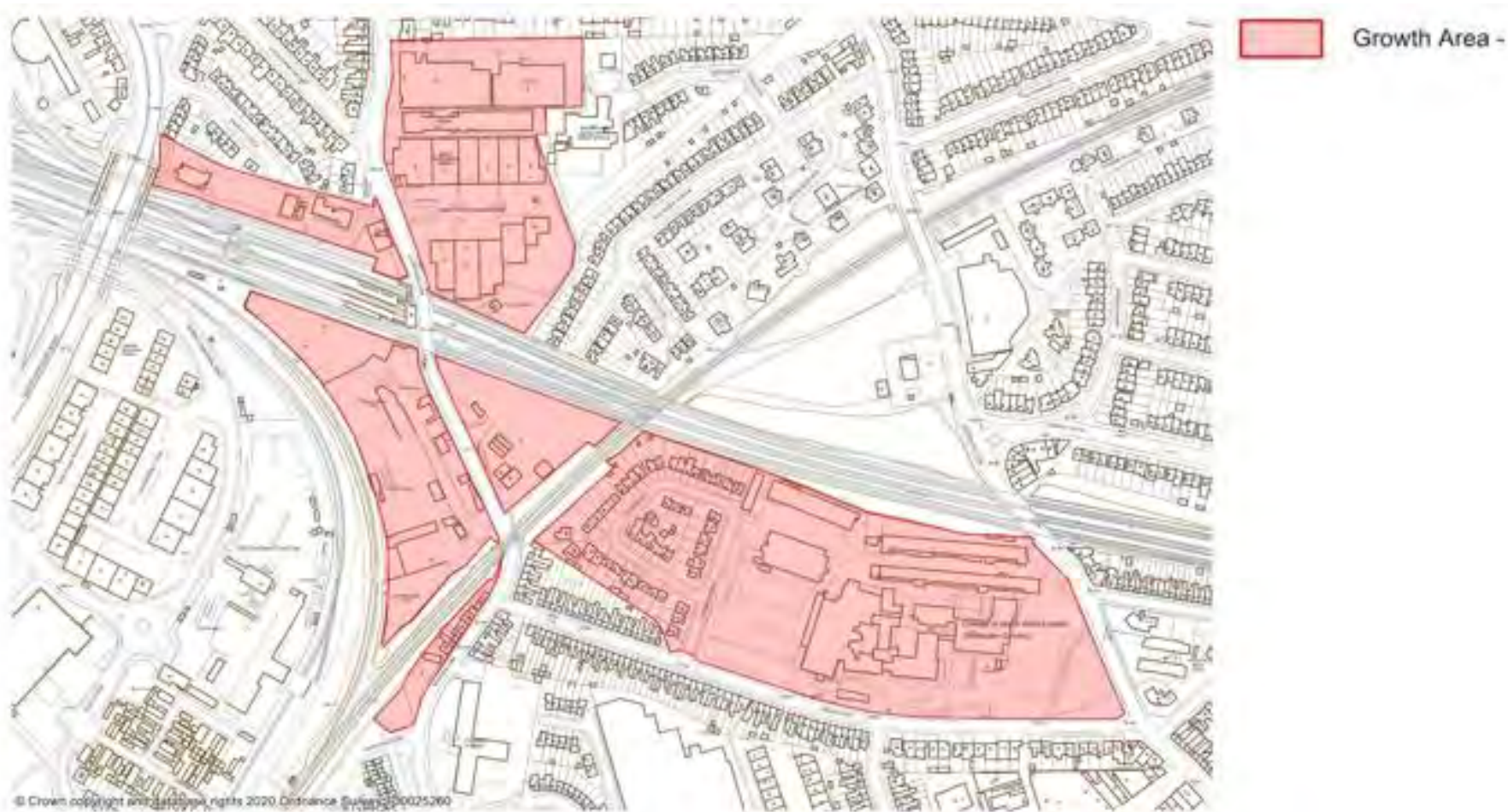
Map Mod 13 Add boundary of New Neasden Growth Area Policy BEGA1A



 Growth Area

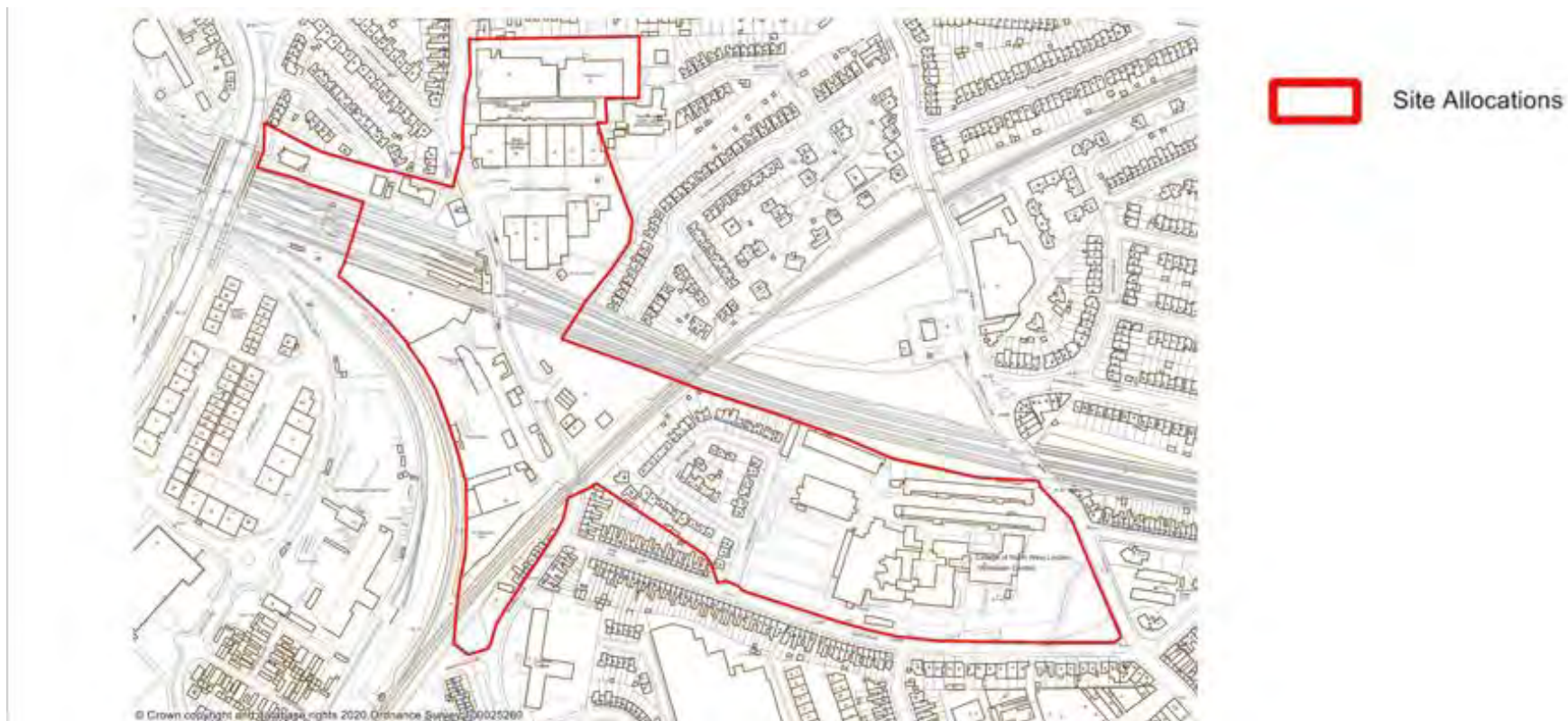
Map Mod 14 Remove Policy BEGA1 Growth Area Designation and replace with Site Allocation Designation

Before

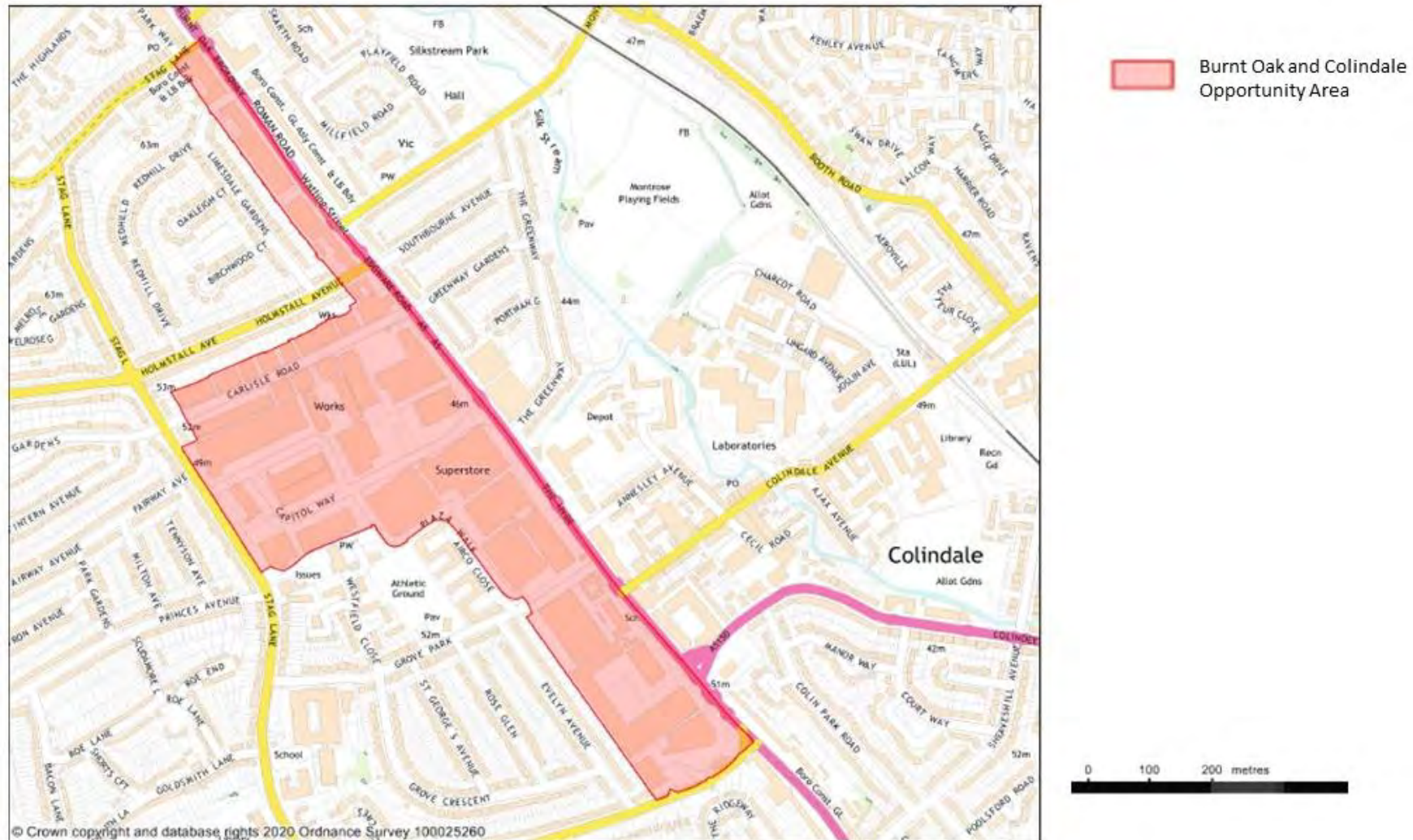


Map Mod 14 Remove Policy BEGA1 Growth Area Designation and replace with Site Allocation Designation

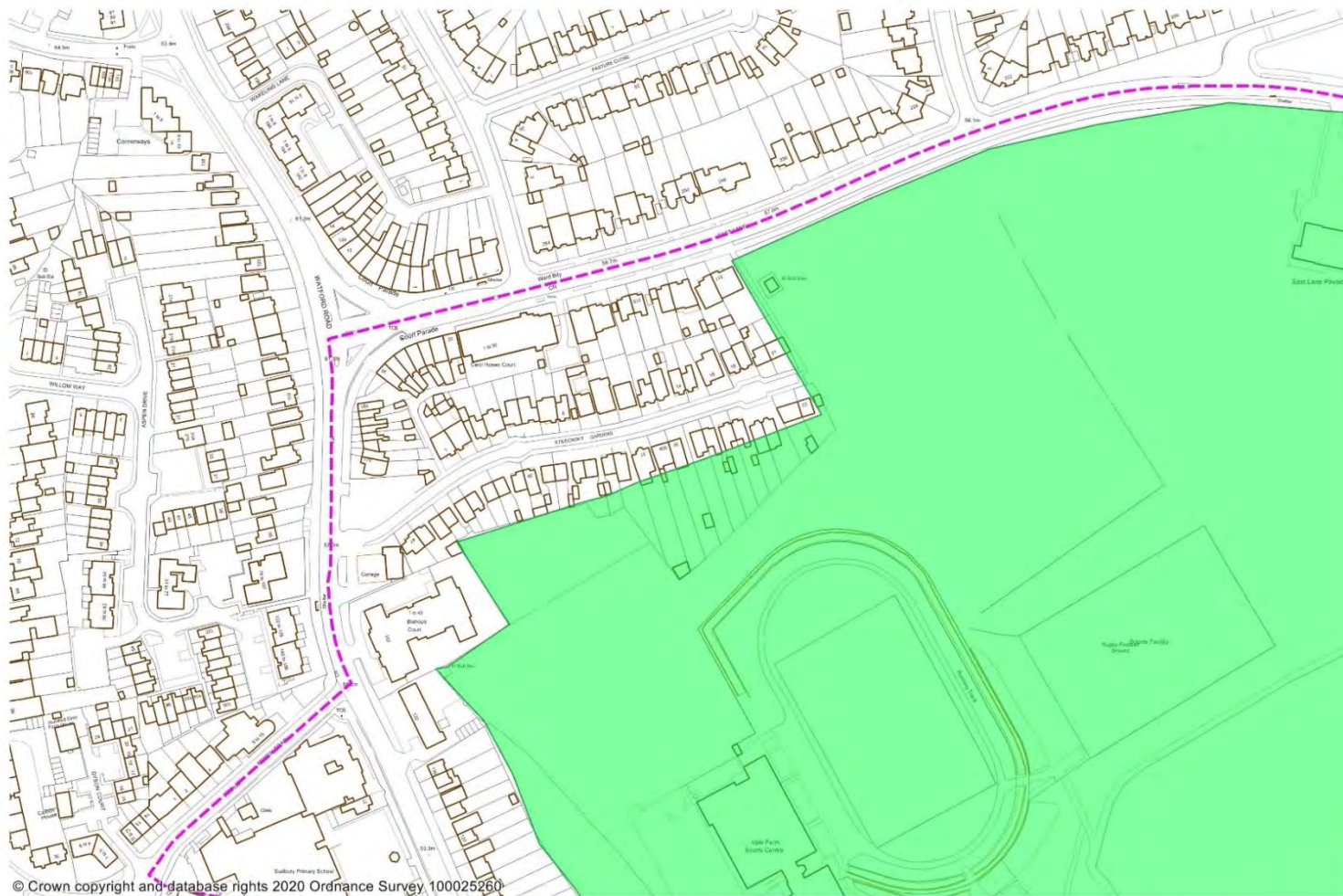
After



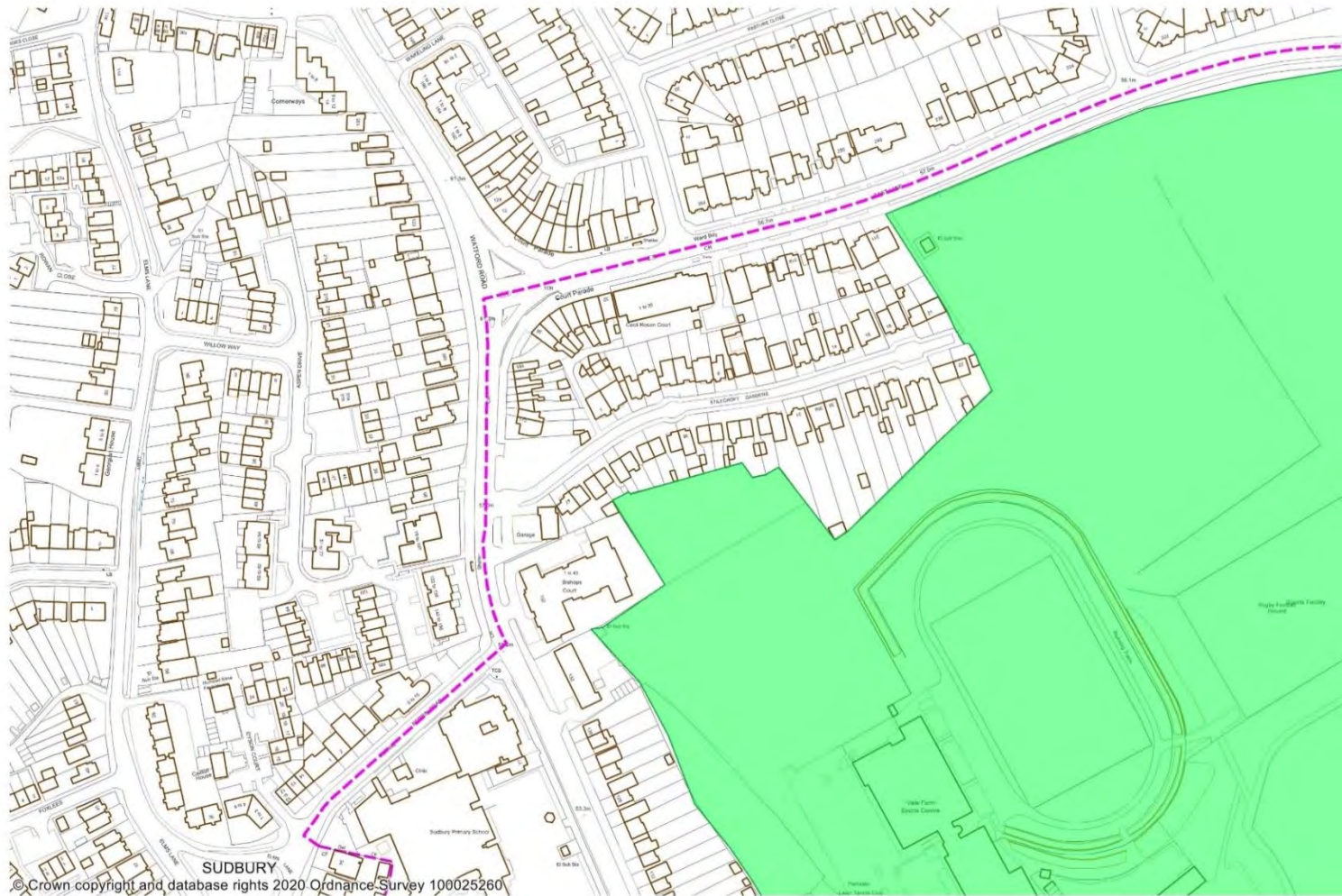
Map Mod 15 Identify Burnt Oak Colindale Opportunity Area with a boundary consistent with the Burnt Oak Colindale Growth Area



Map Mod 16 Vale Farm Local Green Space designation boundary amendment to remove gardens Before



Map Mod 16 Vale Farm Local Green Space designation boundary amendment to remove gardens After



Map Mod 17 Vale Farm Open Space designation boundary amendment to remove gardens

Before



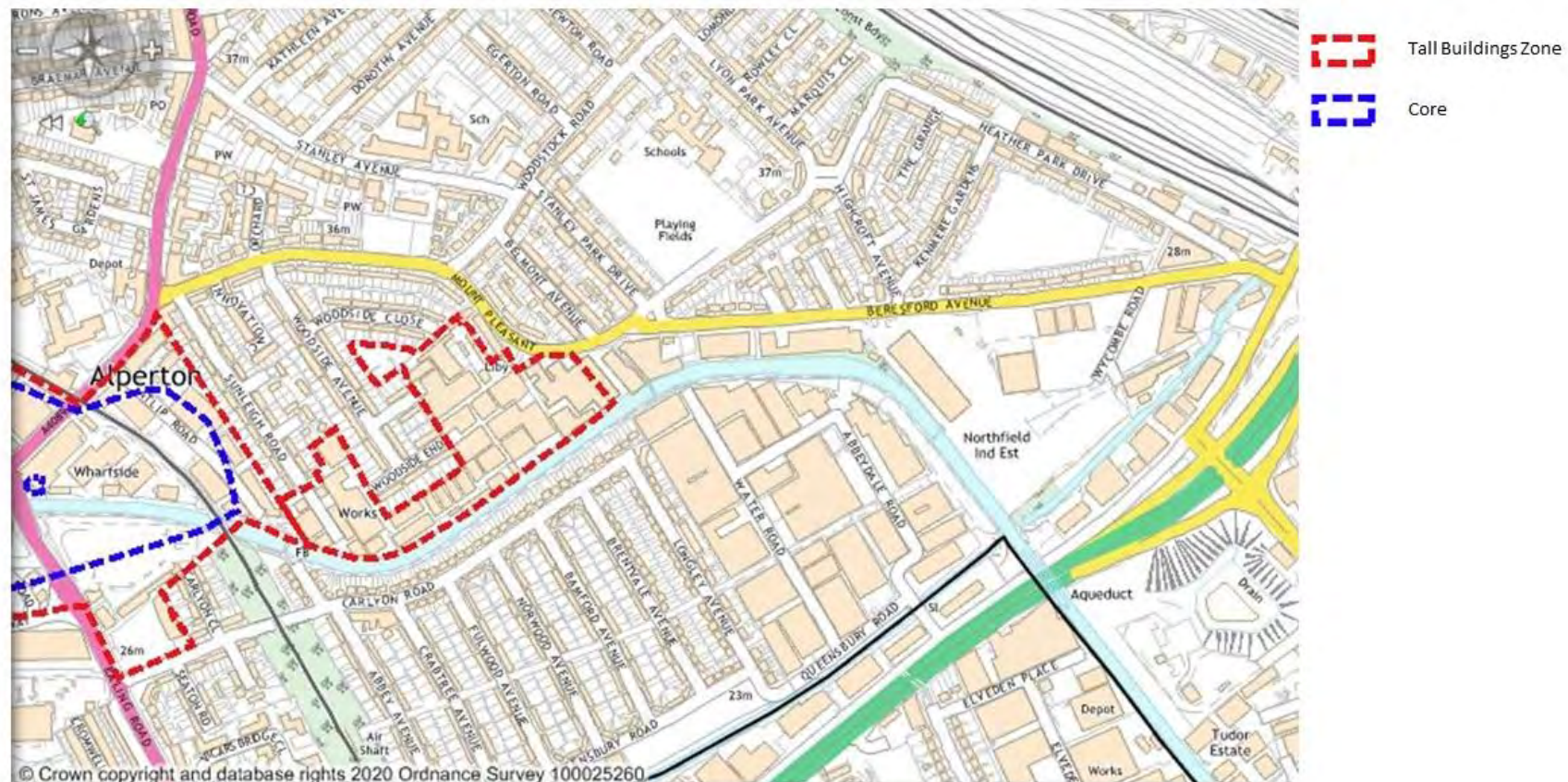
Map Mod 17 Vale Farm Open Space designation boundary amendment to remove gardens

After - remove area within orange polygon



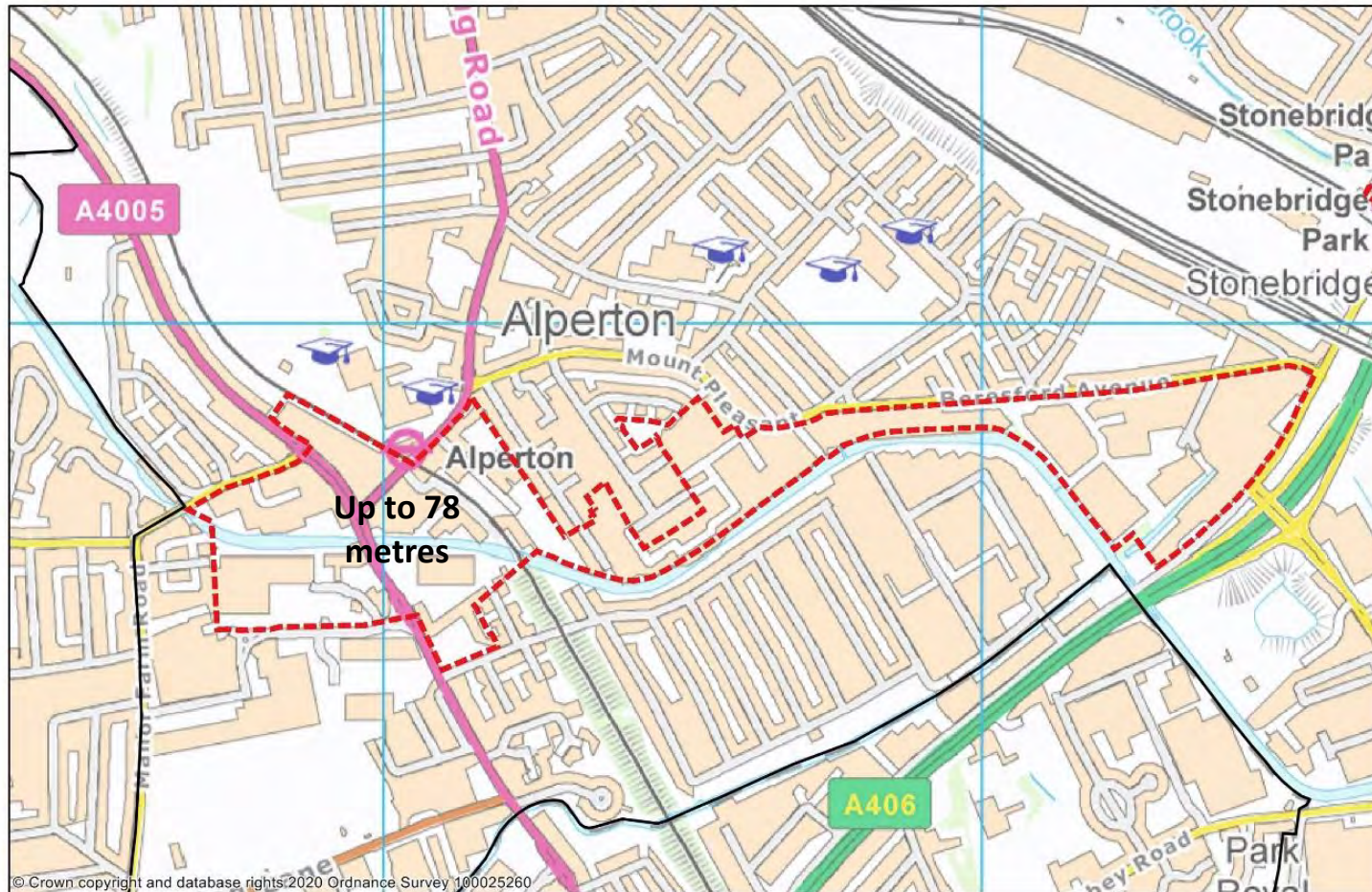
Map Mod 18 Include Northfields and other parts of the Alperton Growth Area within the Alperton Tall Buildings Zone and remove the Core designation.

Before



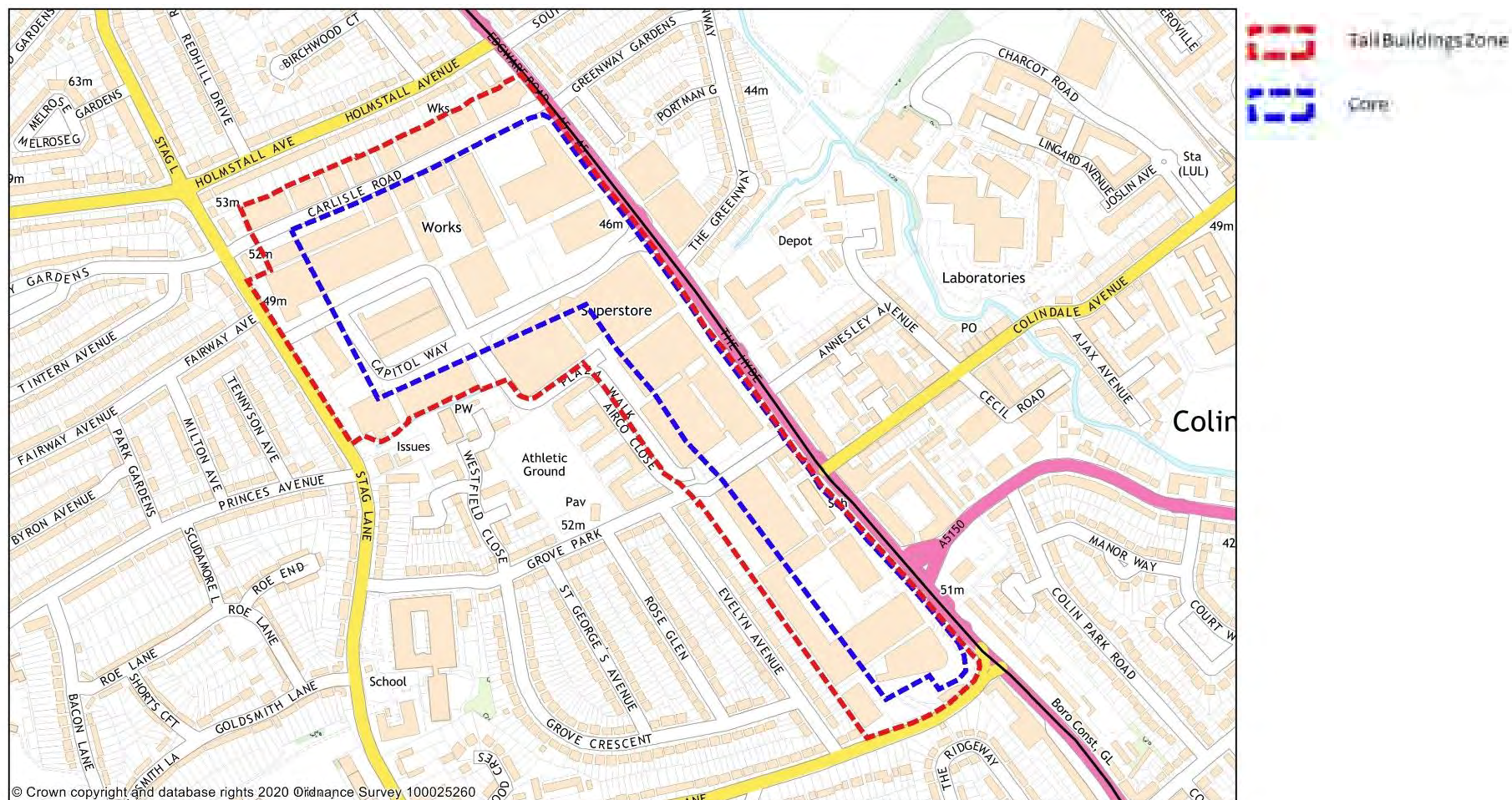
Map Mod 18 Include Northfields and other parts of the Alpertown Growth Area within the Alpertown Tall Buildings Zone and remove the Core designation.

After



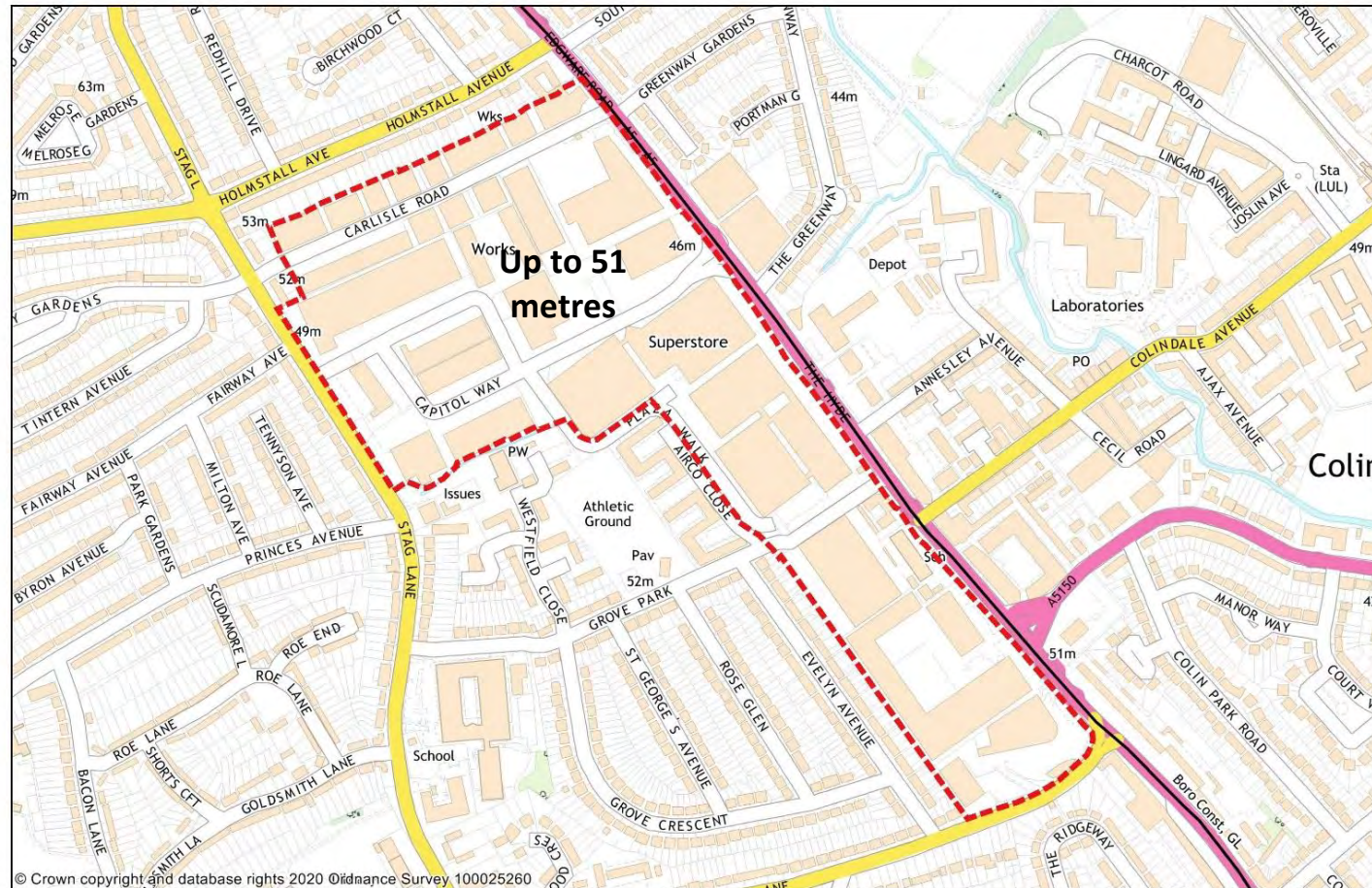
Map Mod 19 Burnt Oak/ Colindale Tall Building Zone remove the Core designation.

Before



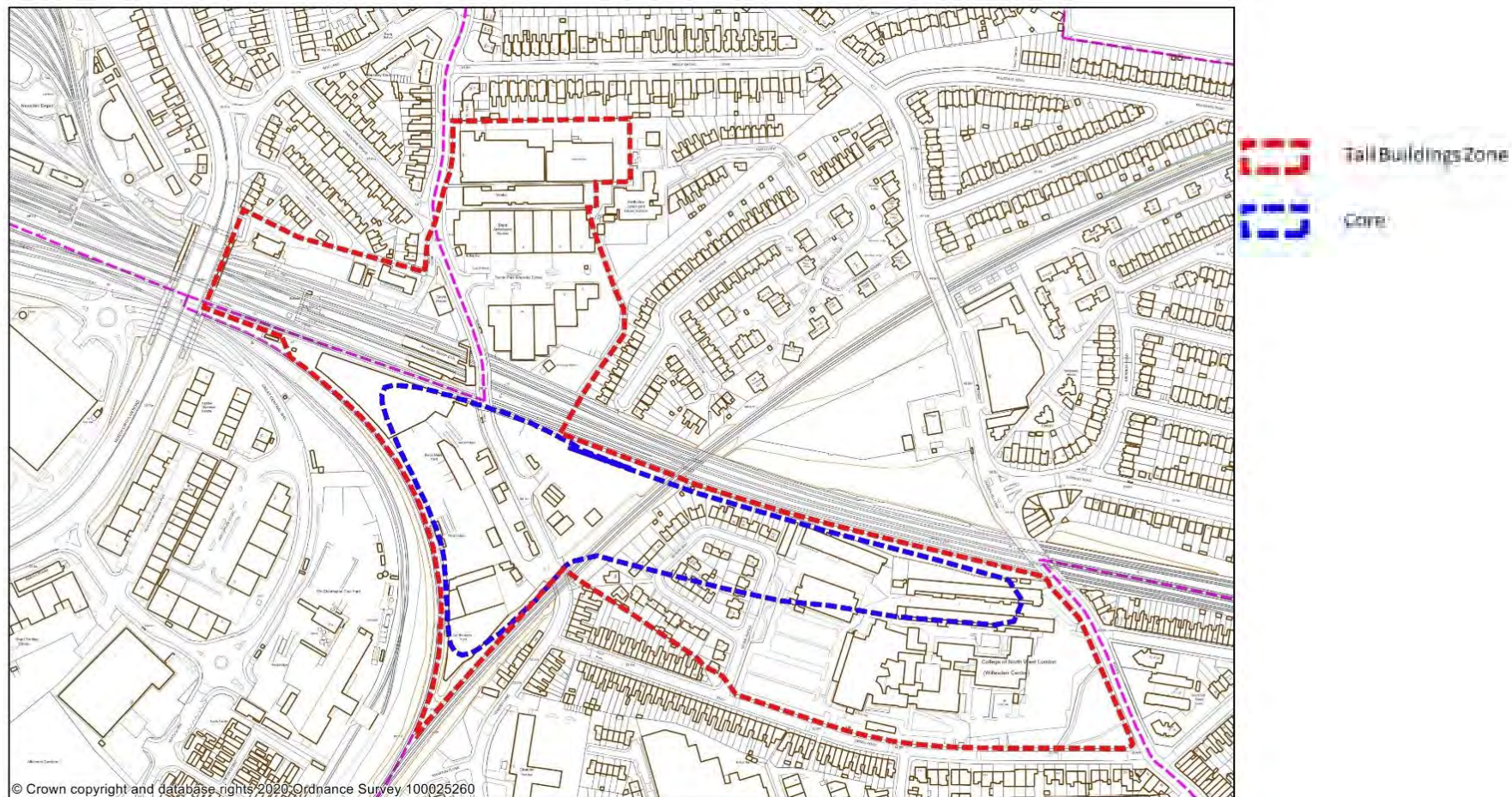
Map Mod 19 Burnt Oak/ Colindale Tall Building Zone remove the Core designation.

After



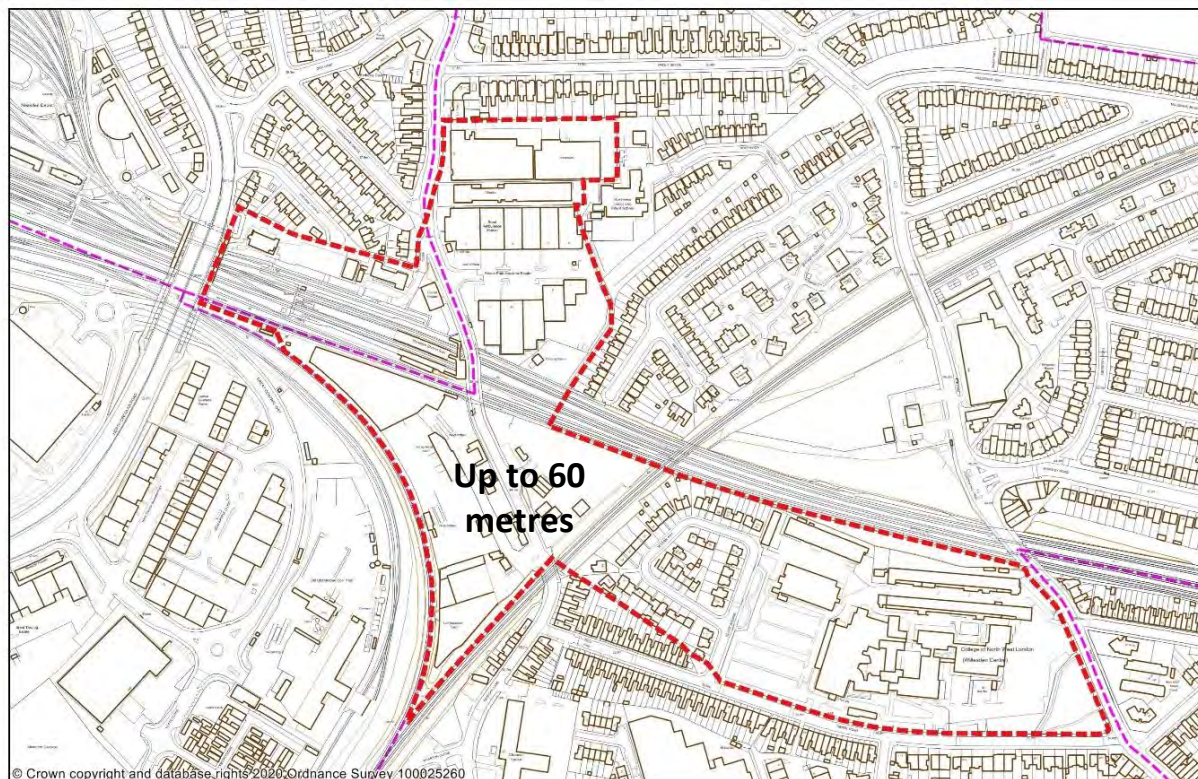
Map Mod 20 Neasden Tall Building Zone remove the Core designation.

Before



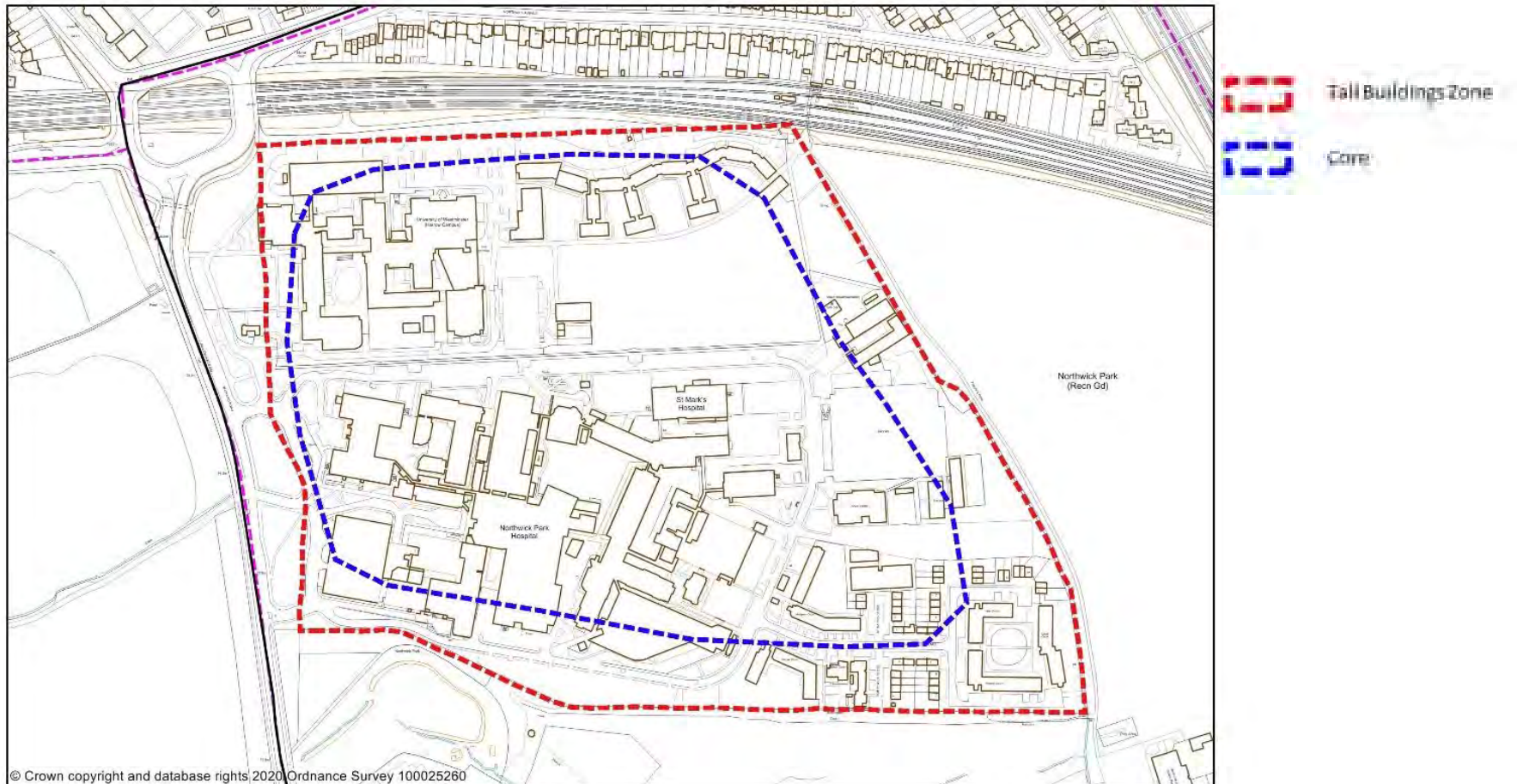
Map Mod 20 Neasden Tall Building Zone remove the Core designation.

After



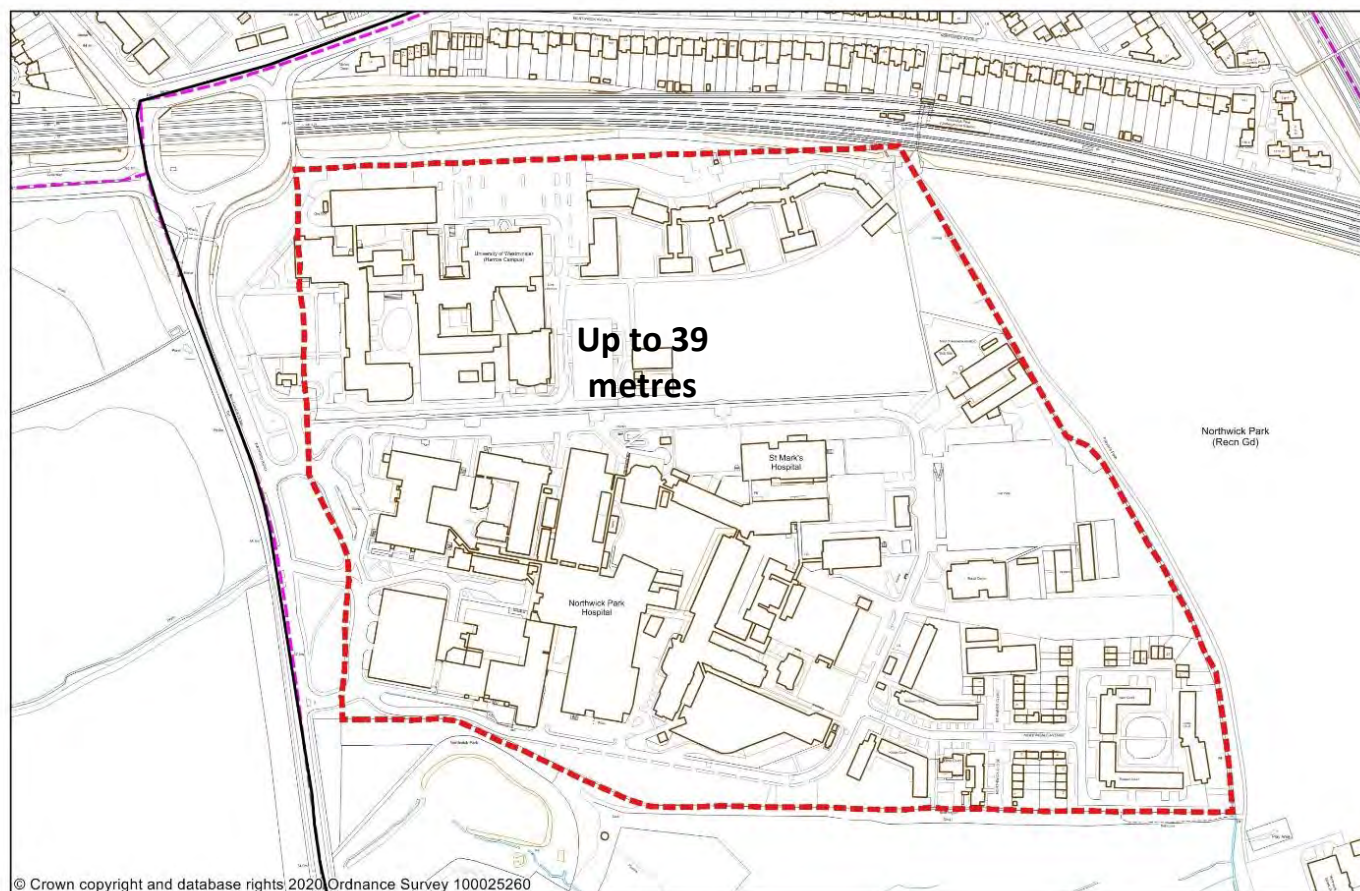
Map Mod 21 Northwick Park Tall Building Zone remove the Core designation.

Before



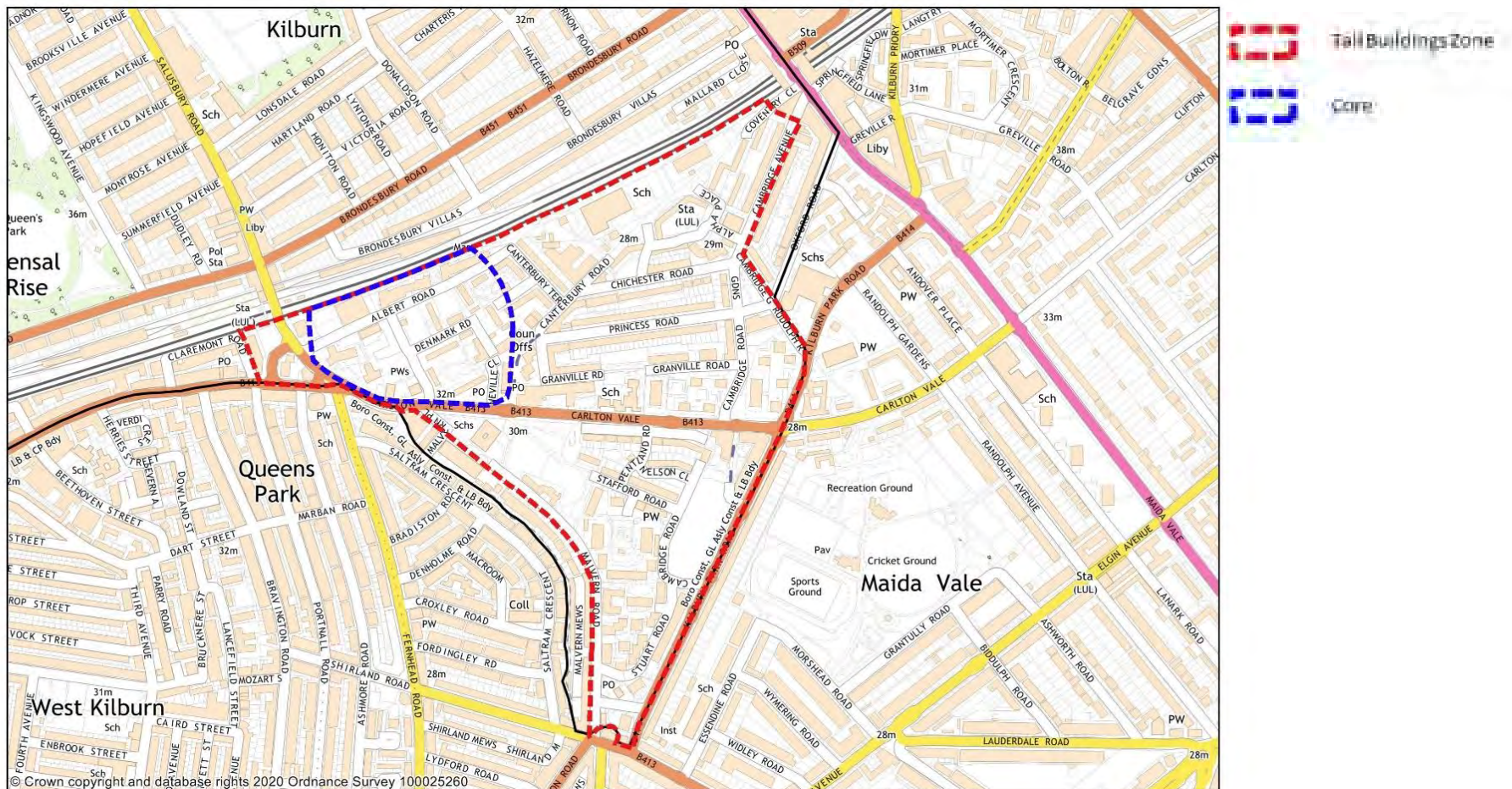
Map Mod 21 Northwick Park Tall Building Zone remove the Core designation.

After



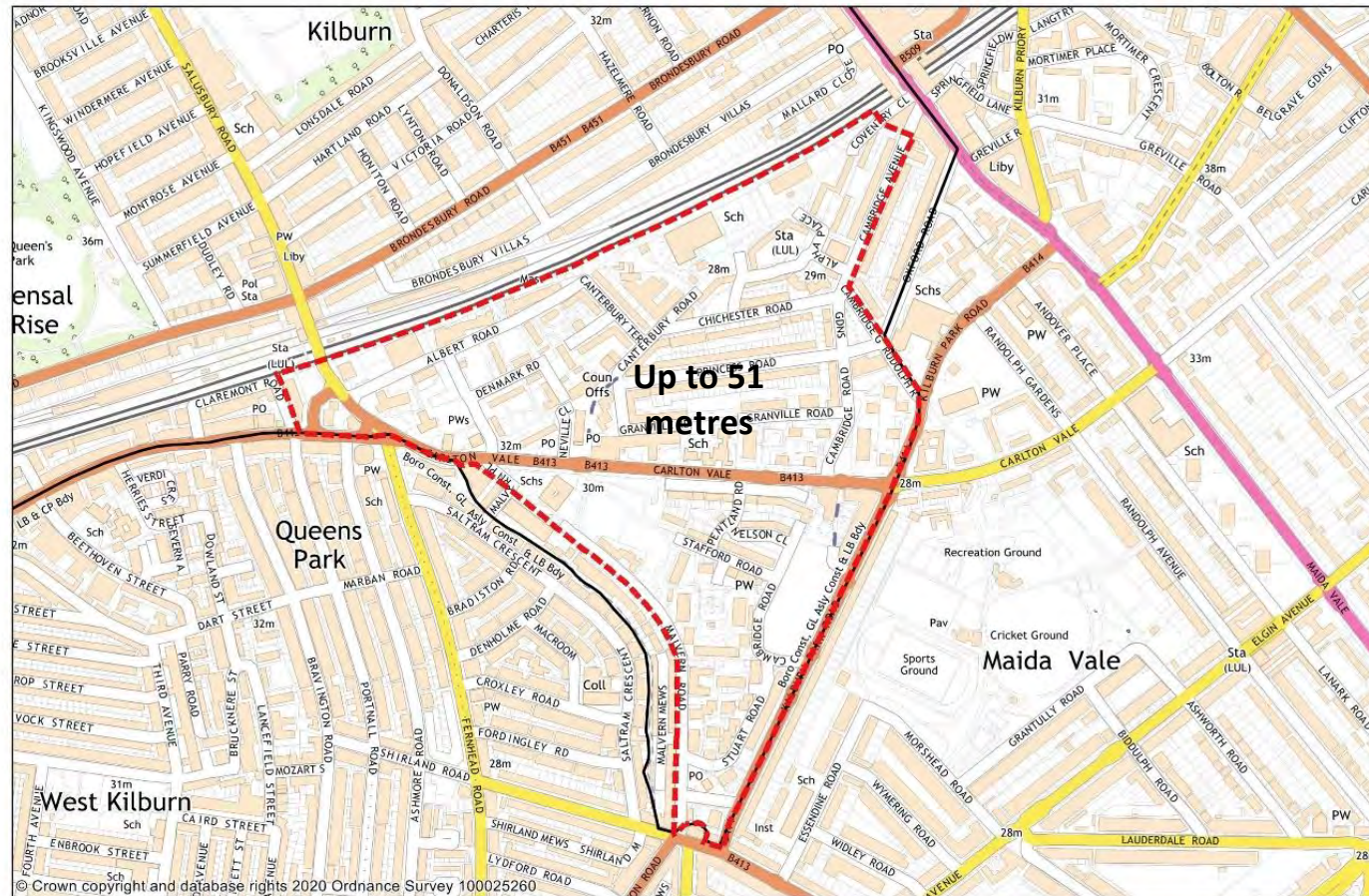
Map Mod 22 South Kilburn Tall Building Zone remove the Core designation.

Before



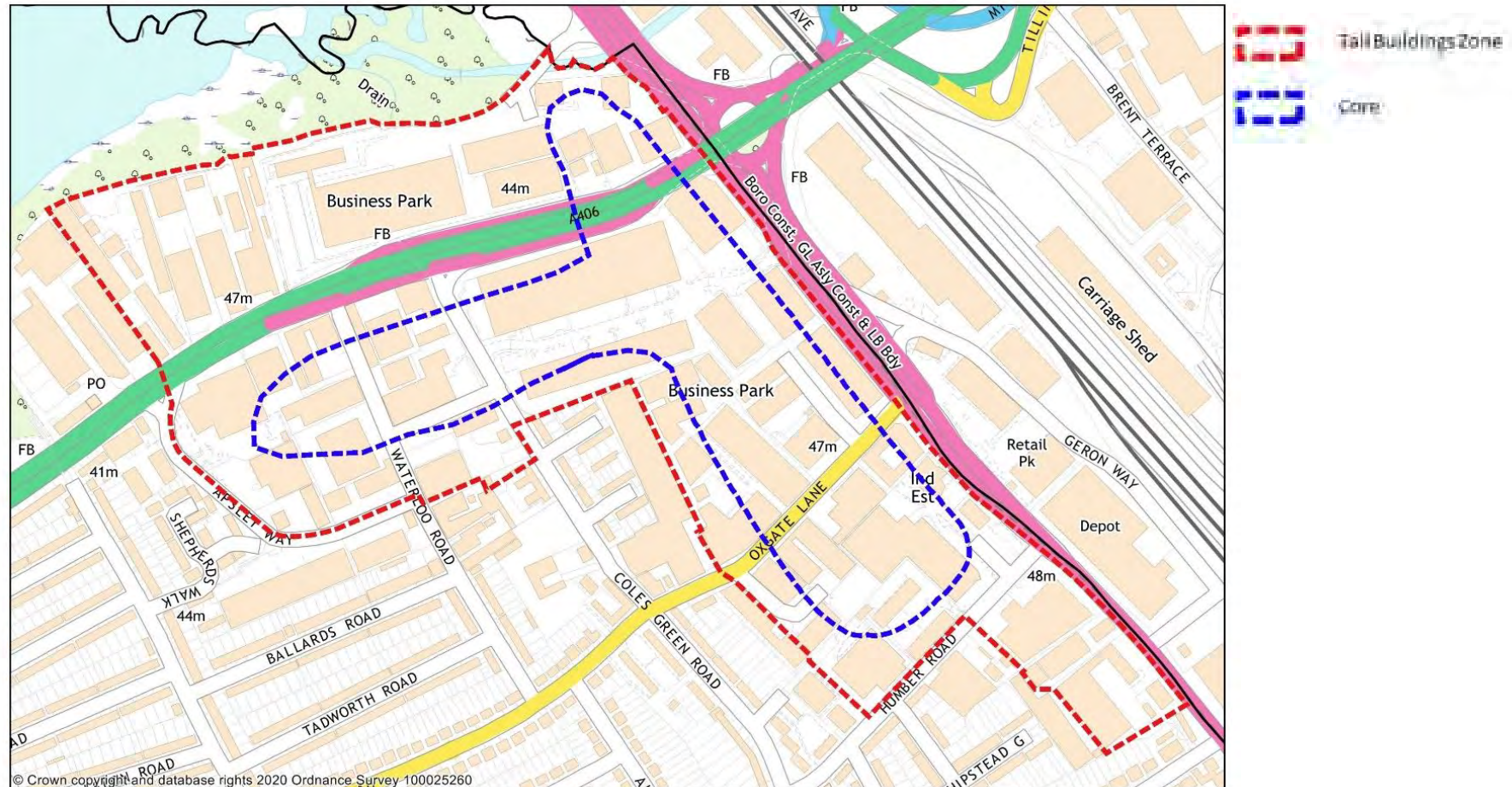
Map Mod 22 South Kilburn Tall Building Zone remove the Core designation.

After



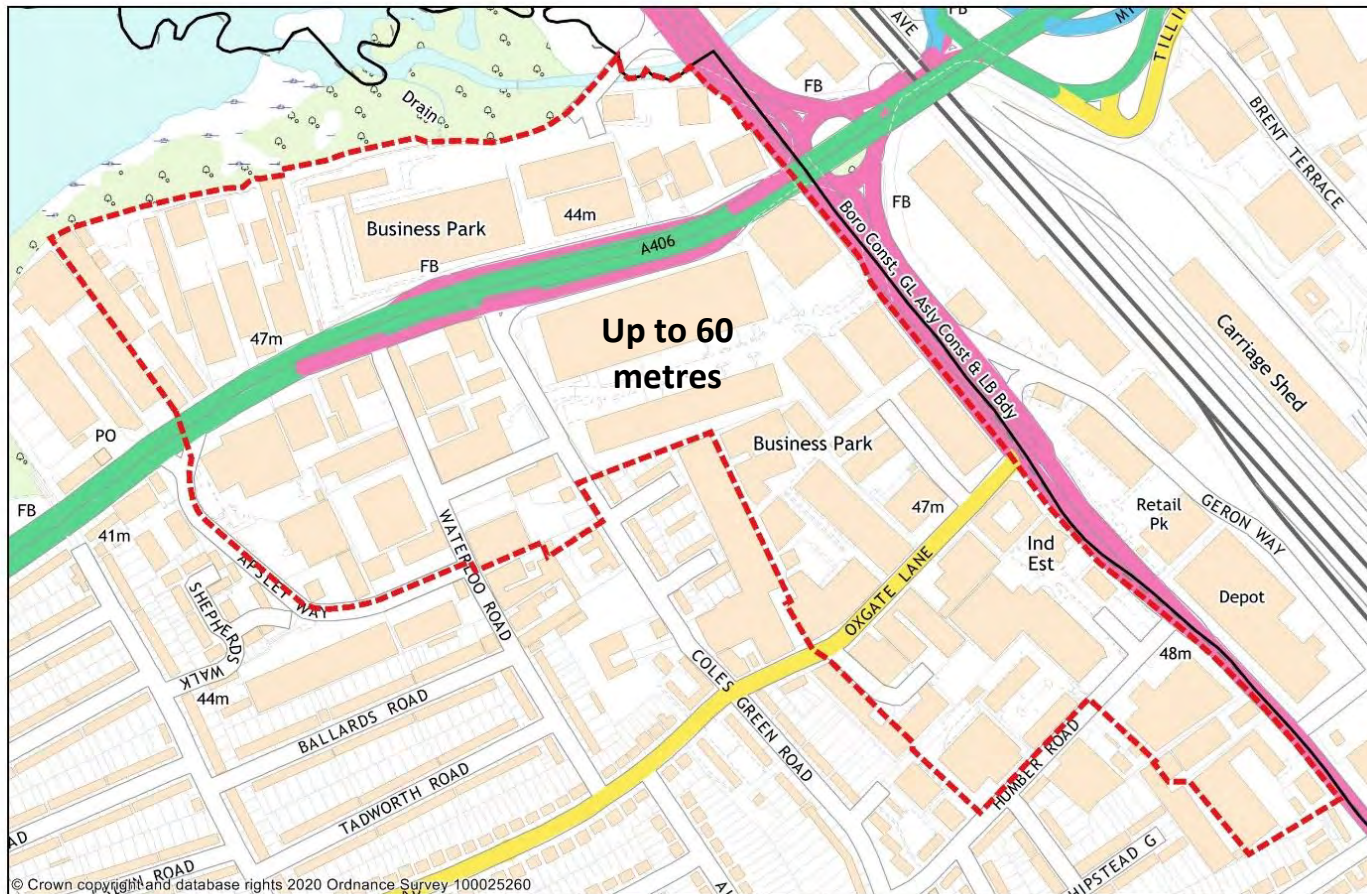
Map Mod 23 Staples Corner Tall Building Zone remove the Core designation.

Before



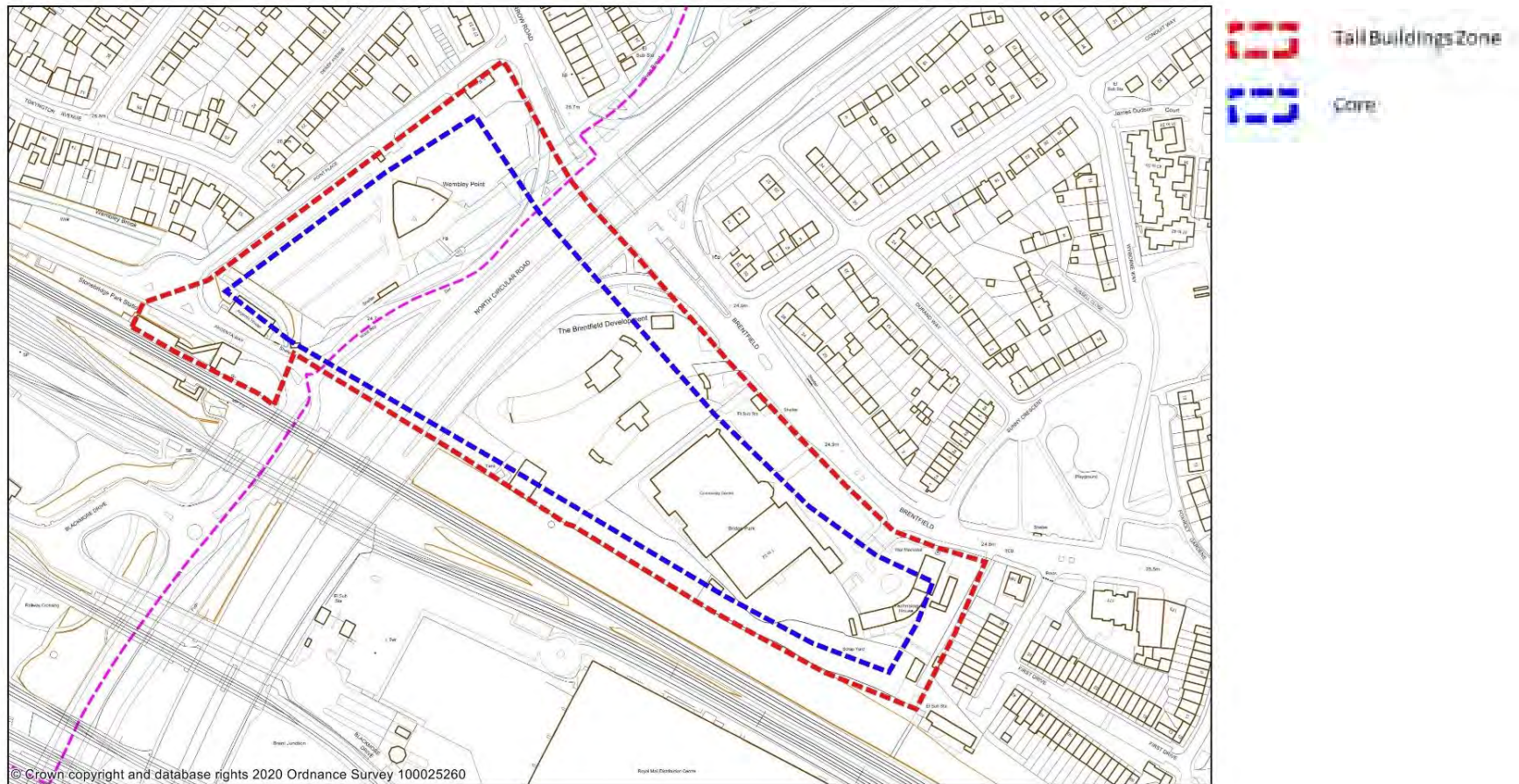
Map Mod 23 Staples Corner Tall Building Zone remove the Core designation.

After



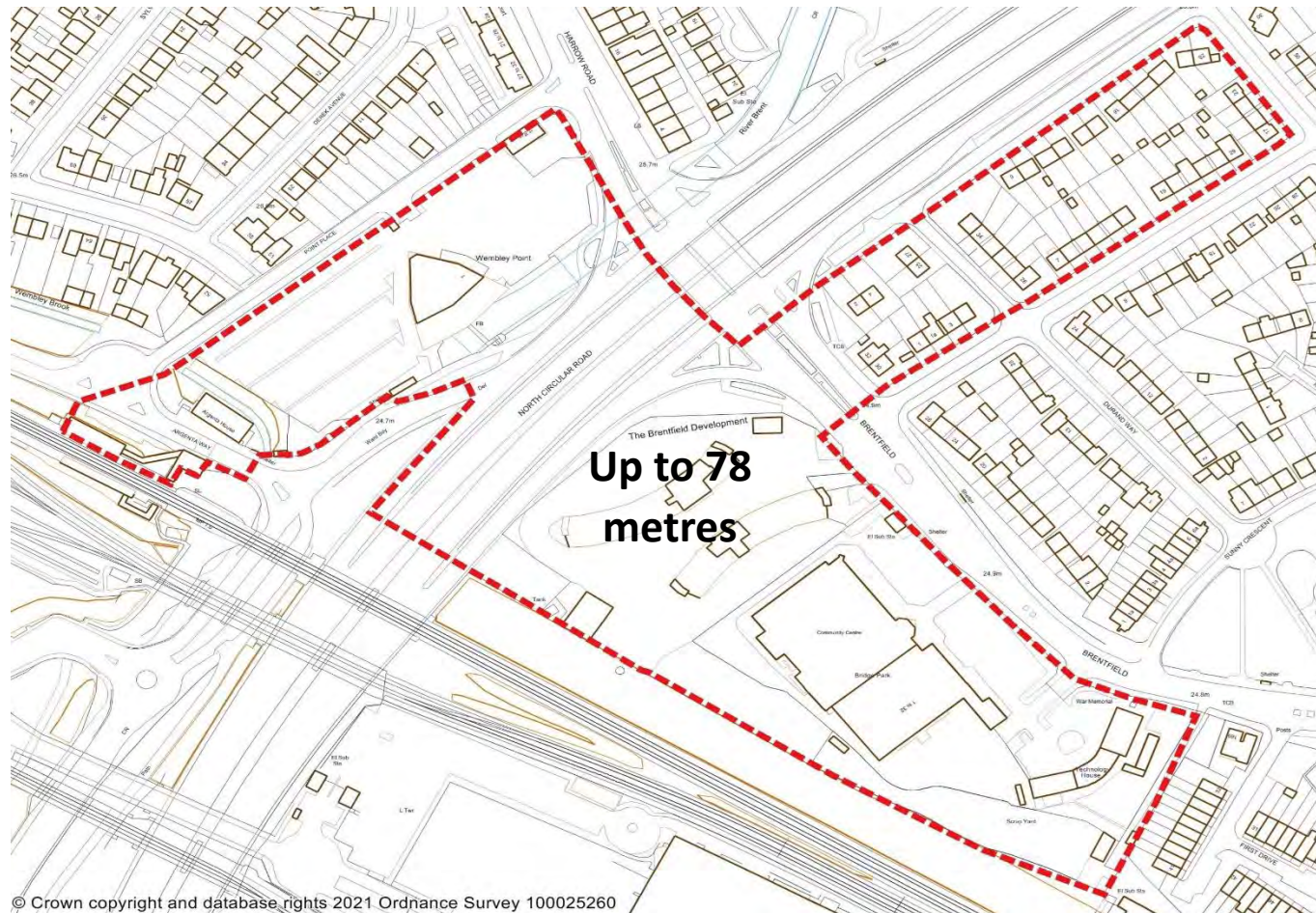
Map Mod 24 Stonebridge Park Tall Building Zone remove the Core designation, extend the Zone and take account of OPDC boundary

Before



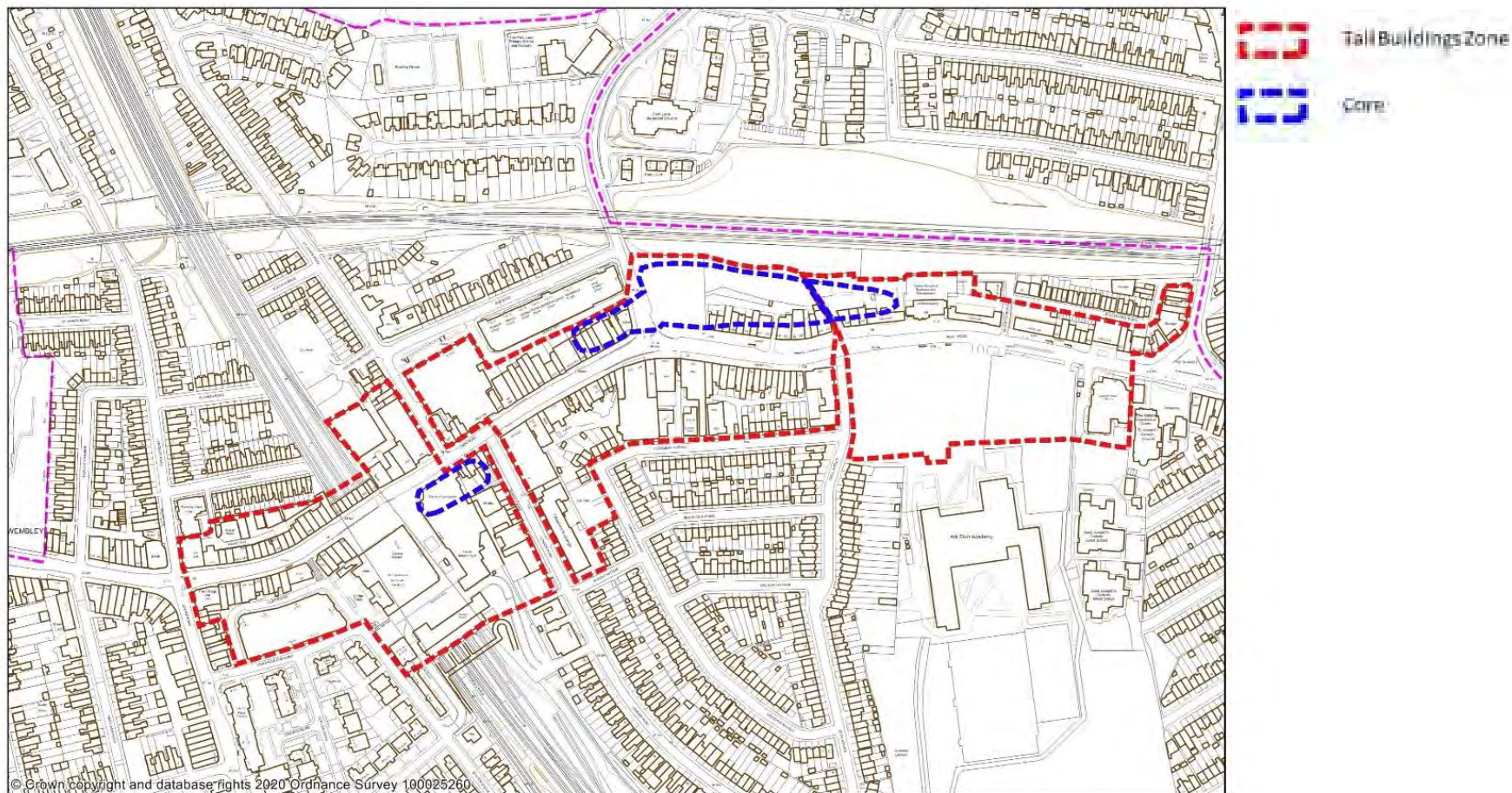
Map Mod 24 Stonebridge Park Tall Building Zone remove the Core designation, extend the Zone and take account of OPDC boundary.

After



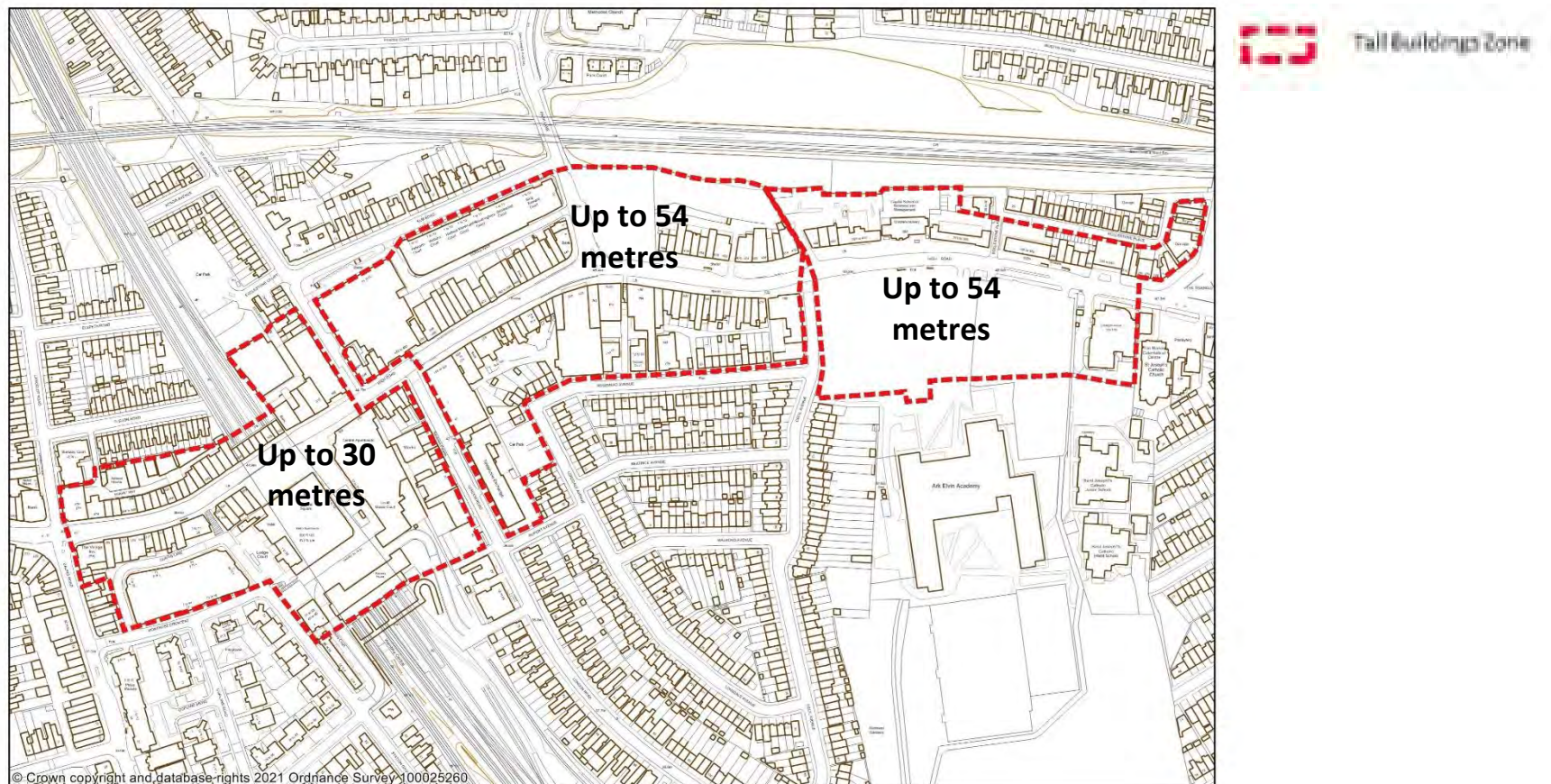
Map Mod 25 Wembley Tall Building Zone remove the Core designation and extend the Zone.

Before



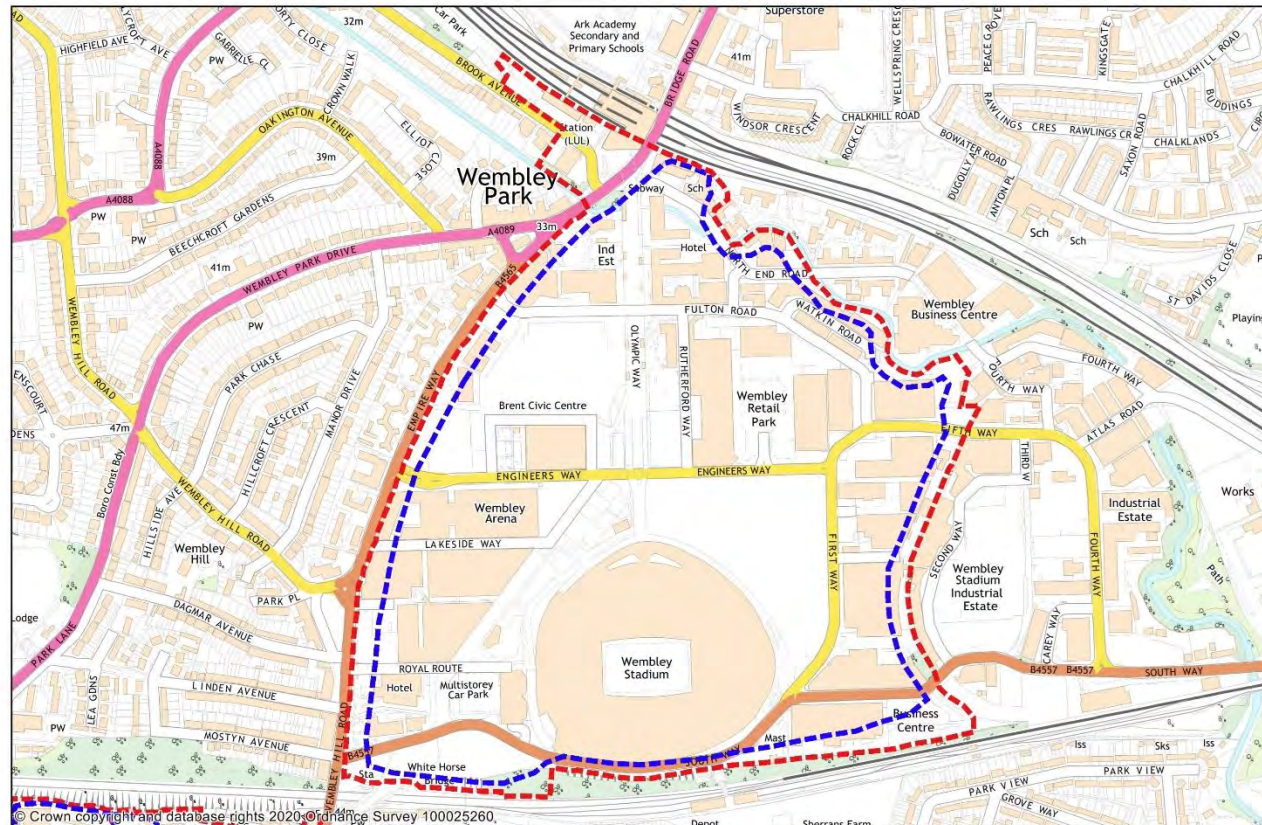
Mod 25 Wembley Tall Building Zone remove the Core designation and extend the Zone.

After



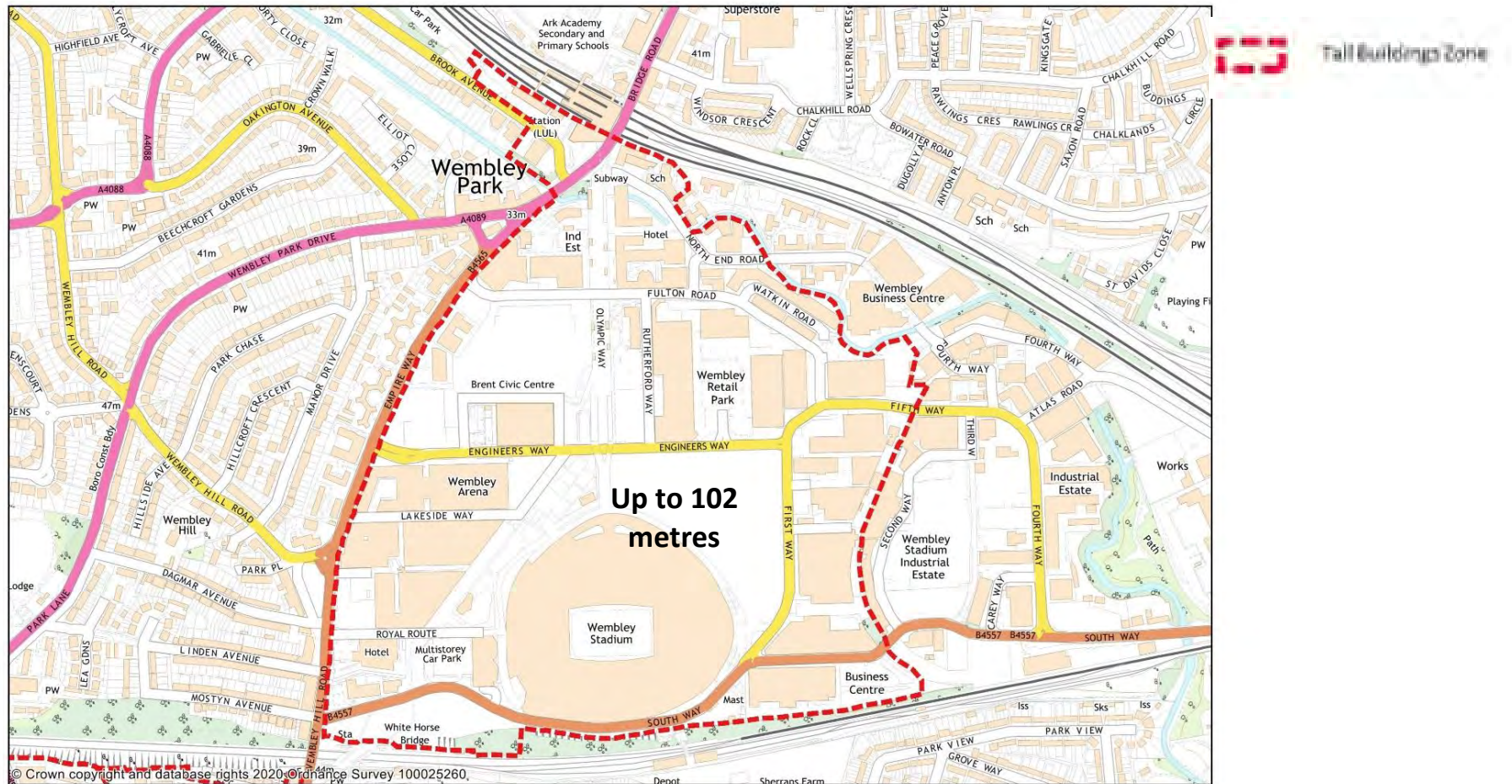
Mod 26 Wembley Park Tall Building Zone remove the Core designation.

Before

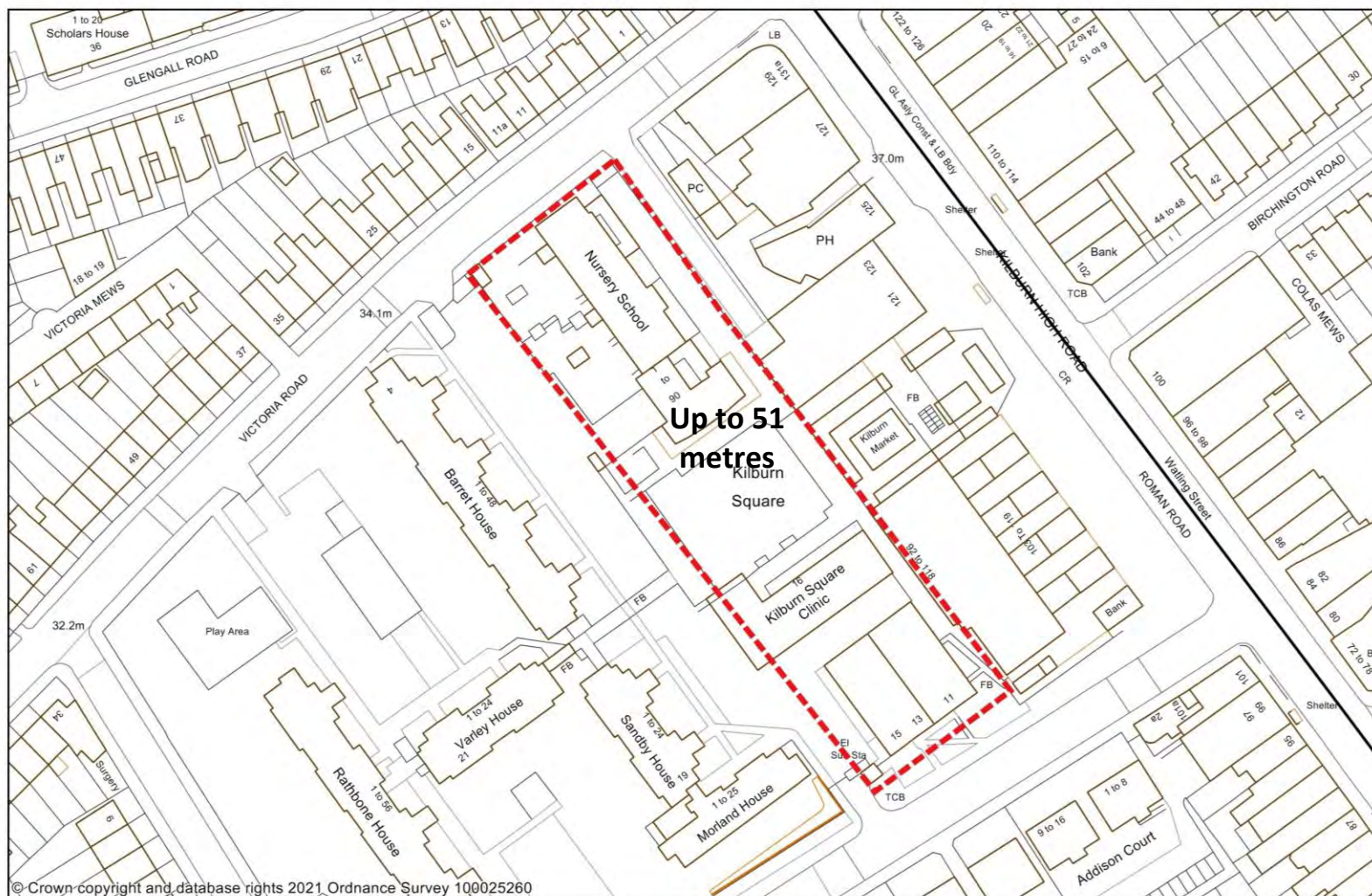


Mod 26 Wembley Park Tall Building Zone remove the Core designation.

After



Mod 27 Add new Kilburn Square Tall Building Zone



Map mod 28 Remove existing Tall Building Zone Pinnacles – Wembley

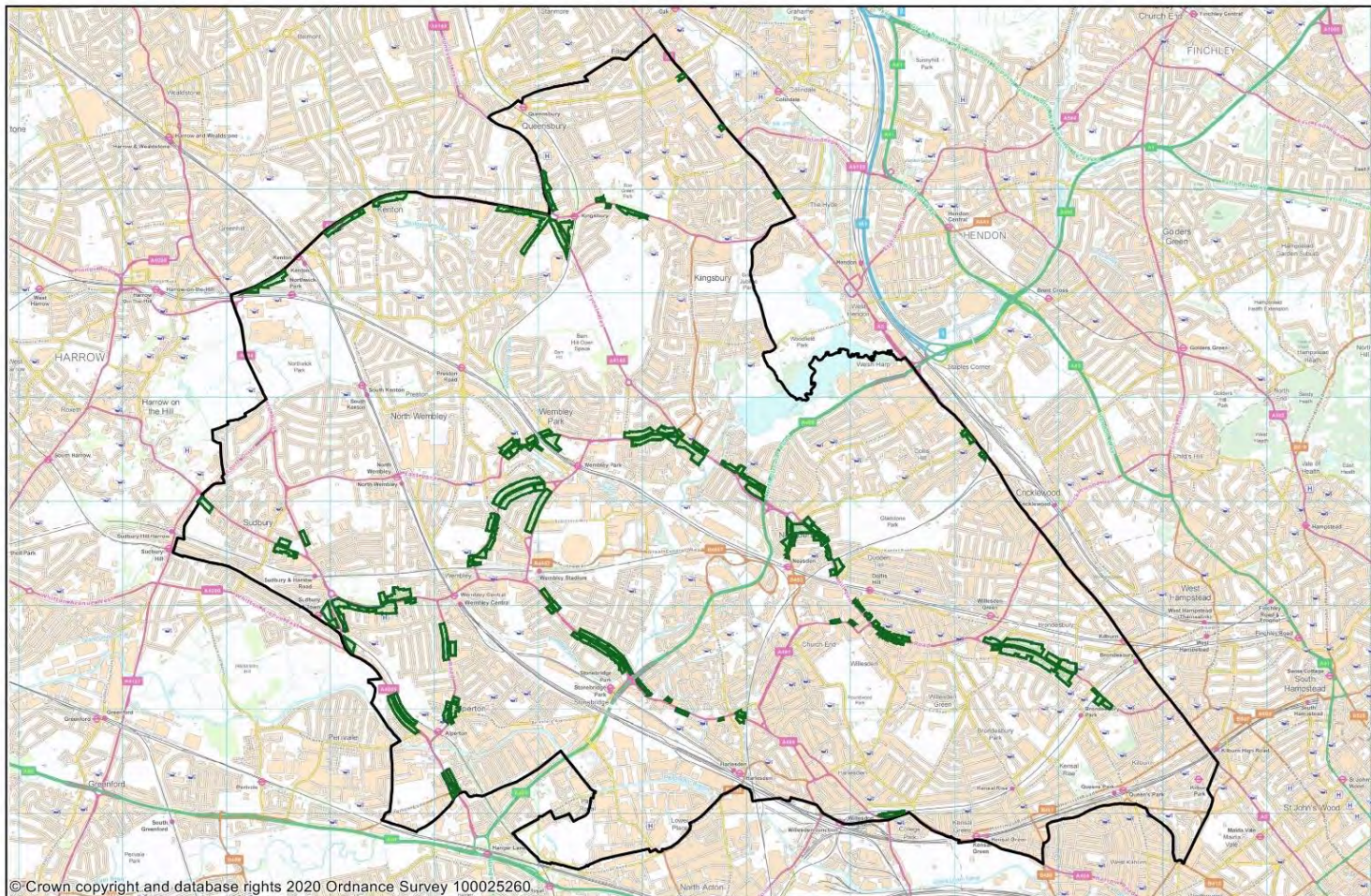


Map mod 29 Remove existing Tall Building Zone Pinnacle – Burnt Oak



Map mod 30 Remove existing intensification corridors and replace with new intensification corridors designation

Before

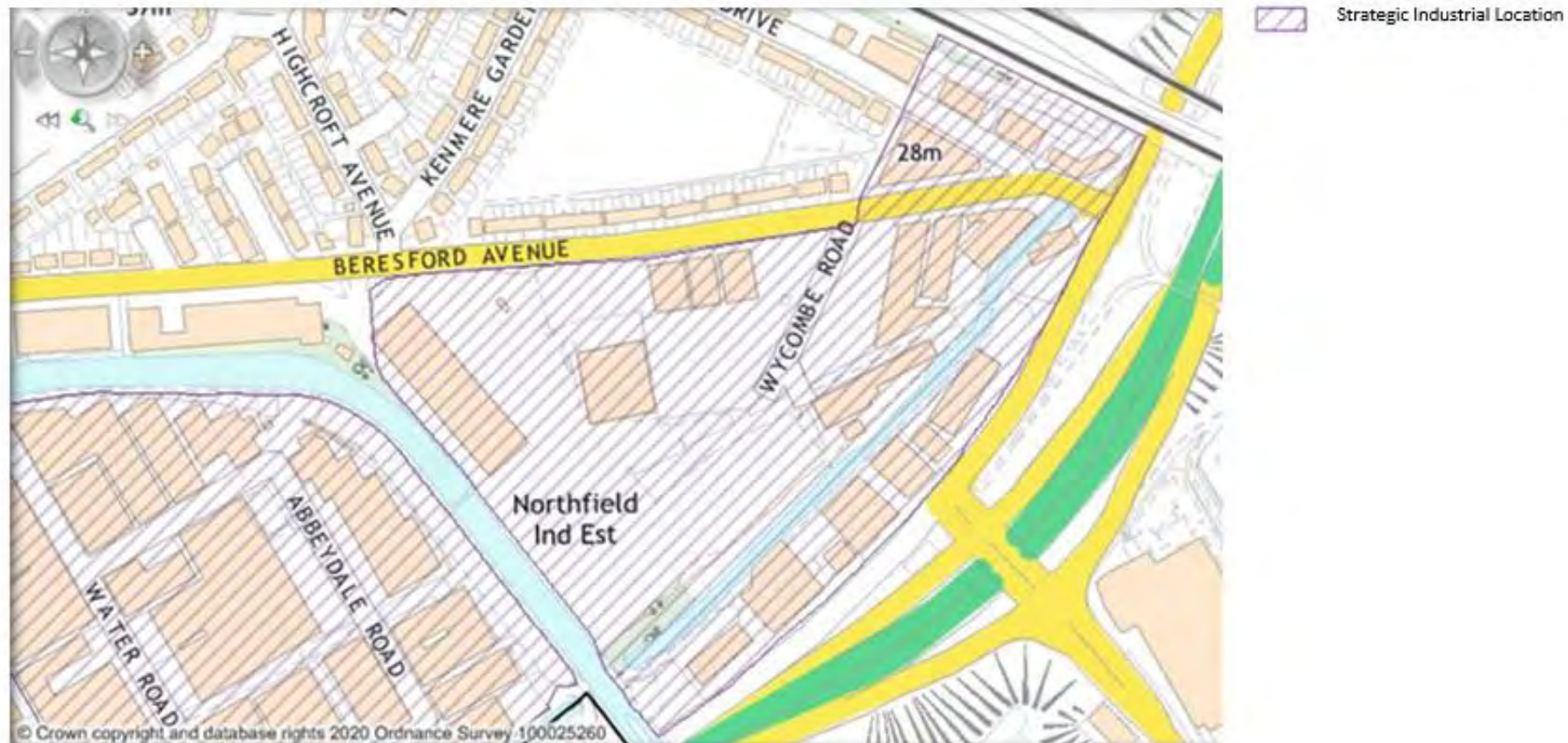


After



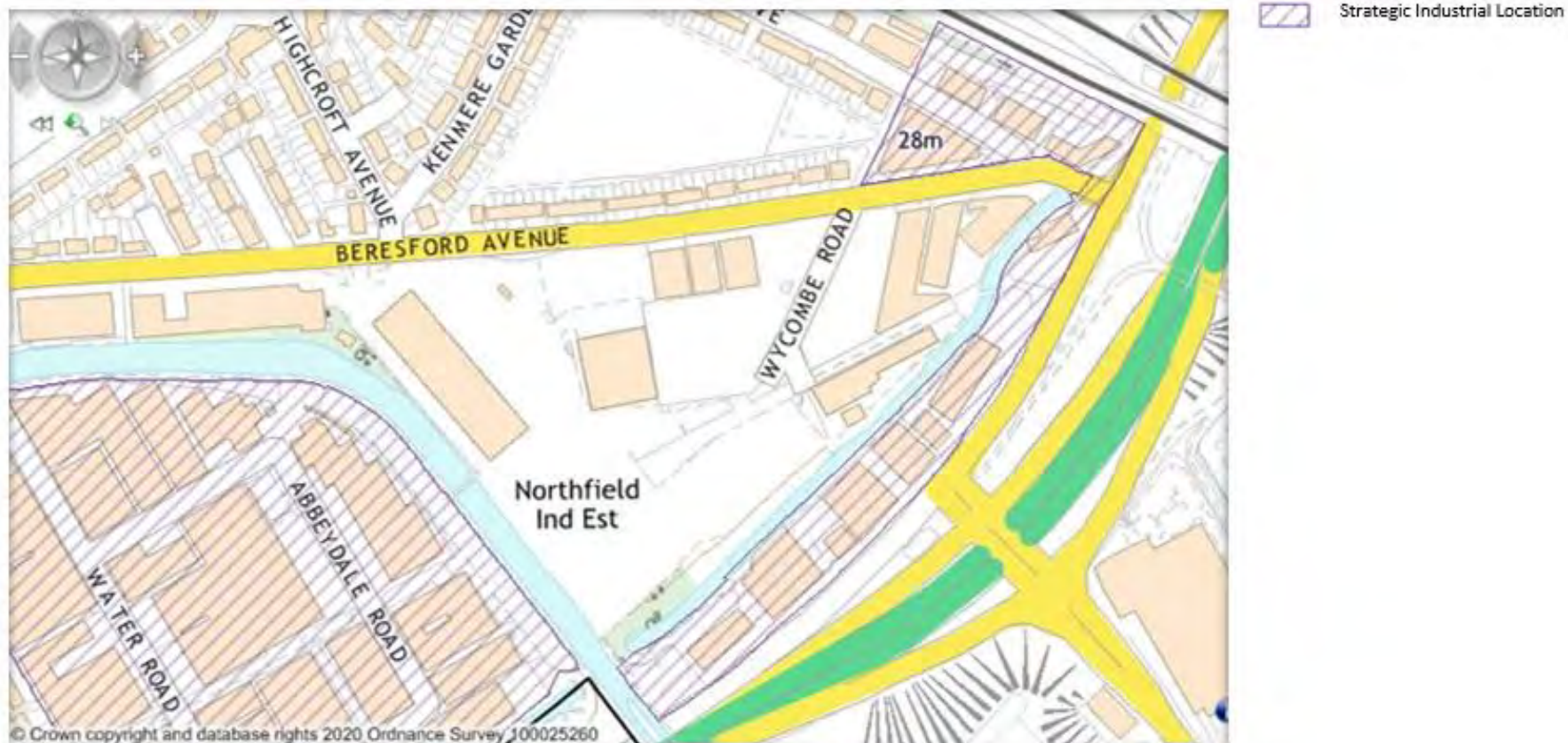
Map mod 31 Amend boundary of Northfields East SIL

Before



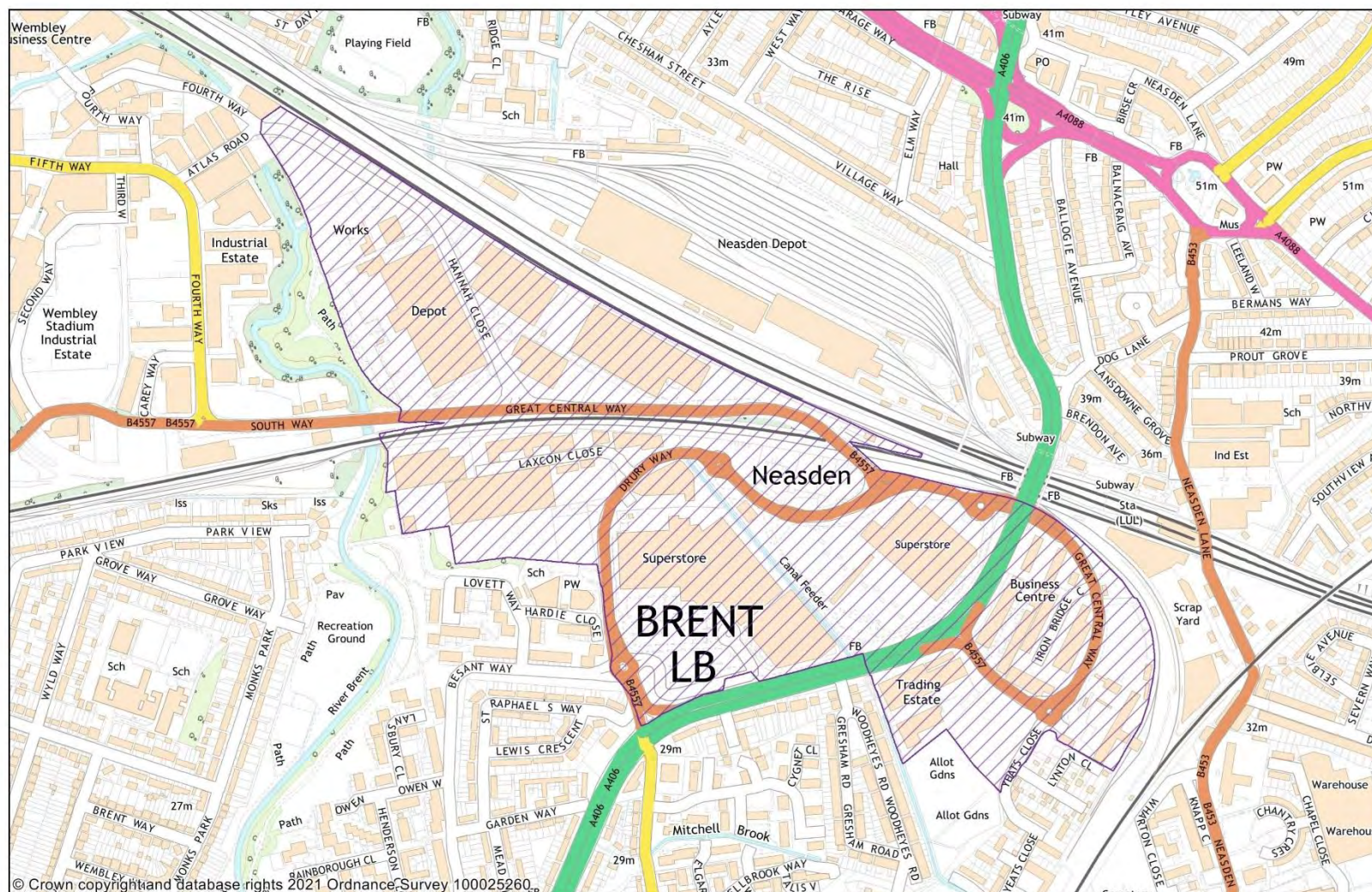
Map mod 31 Amend boundary of Northfields East SIL

After



Map mod 32 Amend Wembley Strategic Industrial Location boundary

Before



Map mod 32 Amend Wembley Strategic Industrial Location boundary

After

