

	<b>Cabinet</b> 11 <sup>th</sup> April 2022
	<b>Report from the Strategic Director  of Regeneration &amp; Environment</b>
<b>Neasden Stations Growth Area Masterplan - Supplementary  Planning Document</b>	

<b>Wards Affected:</b>	Dollis Hill, Dudden Hill, Welsh Harp, Willesden Green
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
<b>No. of Appendices:</b>	Two  Appendix 1: Neasden Stations Growth Area Final Consultation Report  Appendix 2: Neasden Stations Growth Area Masterplan SPD
<b>Background Papers:</b>	Brent Local Plan <a href="https://www.brent.gov.uk/planning-and-building-control/planning-policy-and-guidance/draft-brent-local-plan">https://www.brent.gov.uk/planning-and-building-control/planning-policy-and-guidance/draft-brent-local-plan</a>
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## 1.0 Purpose of the Report

1.1 Brent Council Cabinet on 14<sup>th</sup> June 2021 approved the draft Neasden Stations Growth Area Masterplan Supplementary Planning Document (SPD) for

publication and statutory consultation. This report sets out the results of the consultation feedback, officer considerations and recommended changes to the document. It seeks approval by Cabinet of the adoption of the amended Neasden Stations Growth Area Masterplan Supplementary Planning Document. Once adopted the Masterplan Supplementary Planning Document will have weight as a material consideration in the determination of planning applications.

## **2.0 Recommendation(s)**

- 2.1 Cabinet consider the consultation report, responses, officer recommendations and proposed amendments to the draft Neasden Stations Growth Area Masterplan Supplementary Planning Document as set out in Appendix 1.
- 2.2 Cabinet approve the adoption of the Neasden Stations Growth Area Masterplan Supplementary Planning Document as set out in Appendix 2.

## **3.0 Detail**

### **Background**

- 3.1 Brent Full Council on 24<sup>th</sup> February 2022 approved the adoption of Brent's new Local Plan. The Plan sets out the vision and policies for development in the borough to 2041, including 23,250 new homes from 2019/20 to 2028/29. Key to accommodating an increasing population are 8 growth areas, viewed as the most sustainable spatial expression for growth, exploiting brownfield land, good access to public transport and higher densities to deliver the majority of new homes alongside regeneration benefits and infrastructure.
- 3.2 Neasden Stations Growth Area (NSGA) comprises 11.5 hectares of land around Neasden Underground Station, characterised by low-density commercial, light industrial, storage and waste management uses and the underutilised College of North West London site. Brent's new Local Plan identifies the potential for NSGA to join the proposed West London Orbital line and accommodate a new mixed-use neighbourhood with the capacity to deliver business growth and jobs, infrastructure and at least 2,000 new homes. Before any redevelopment can be permitted however, the Plan requires a Masterplan be put in place to ensure comprehensive regeneration that maximises the opportunity for local residents, businesses and communities.
- 3.3 Officers developed the draft NSGA Masterplan SPD in-house, in partnership with the Greater London Authority, and in consultation with a range of partners and stakeholders including the West London Alliance, Transport for London, and local landowners and developers. The Masterplan SPD sets out the vision and objectives for transformational change of the area, the planning policy framework to which new development must comply and spatial analysis of the current state and land use of the area which provides the foundation for regeneration and growth. The Masterplan SPD sets a robust urban design framework comprising development, placemaking and environmental and sustainability principles, to ensure new development is coherent and

comprehensive, and creates a place where people choose to live, learn, work and relax, and adheres to environmental standards required for climate change resilience and transition to net zero carbon. Guidance is also provided regarding the planning process for new development schemes, as well as illustrative case studies of urban design best practice.

- 3.4 Brent Council Cabinet on 14<sup>th</sup> June 2021 approved the draft NSGA Masterplan SPD for publication and statutory consultation. This Cabinet report sets out the consultation feedback received, officer responses and recommended changes to the Masterplan SPD for Cabinet to consider (Appendix 1). The report recommends Cabinet approve the adoption of the Neasden Stations Growth Area Masterplan Supplementary Planning Document (Appendix 2).

### **Consultation on draft NSGA Masterplan SPD – Overview**

- 3.5 The draft NSGA Masterplan SPD document was consulted upon for an extended 7 week period starting 21<sup>st</sup> June 2021 and ending 9<sup>th</sup> August 2021. It was placed on the Brent Council website and consultation portal. It was also publicised on social media channels including Twitter, Facebook and LinkedIn. Paper copies were made available at the Willesden and Wembley libraries. 1500 consultation flyers were distributed to residents in and around the NSGA, which included details of consultation events. 4 consultation drop in sessions were held in and around the NSGA to listen and answer concerns and queries regarding the draft Masterplan SPD. A wide range of stakeholders including individual residents, local organisations, councillors, statutory consultees, landowners and developers, and other interested parties identified on the planning policy contacts database were notified of the consultation.
- 3.6 36 responses were received. Responses are broadly positive and supportive of the overarching vision for regeneration set out in the draft NSGA Masterplan SPD, but include specific questions and concerns. Resident concerns cover a range of detailed issues including transport, public realm, open spaces, safety, affordable housing, scale and height of development, local amenities and infrastructure. Statutory consultees responded on their areas of responsibilities, including Greater London Authority on planning policy and Transport for London focus on the proposed West London Orbital line. Landowners and developers emphasised the need for flexibility, and not to unduly constrain development, nor set overly prescriptive land use, design and infrastructure requirements.

### **Consultation Responses – Summary**

- 3.7 The NSGA final consultation report is attached at Appendix 1 and after providing an overview of the consultation, at sections 4.1 and 4.2 details the schedule of consultation responses, officer considerations and proposed changes to the draft NSGA Masterplan SPD. A summary of the main consultation response themes and proposed changes is also set out below.

## **Consultation Process**

- 3.8 Criticism was received from one resident about the Council's communications, engagement and commitment to consultation. Two other residents stated there were not enough people to answer questions at the consultation event at St Catherine's Church. In response, it is noted that the consultation was widely communicated via online and physical media, included 4 physical drop-in sessions, and took place over an extended 7 week period, in excess of the 4 weeks required under relevant Regulations. An additional 1 week was provided after requests from some respondents to finalise their representations, and an extra consultation event held for residents of Severn Way, Selbie Avenue and Denzil Road, attended by local ward councillors. Officers were available to answer questions at all public consultation events, however demands for additional officer resource for future public consultation events are noted.

## **Scale & Height Development**

- 3.9 Whilst there was broad recognition amongst respondents that Neasden is in need of regeneration, some resident responses expressed concern about the scale and height of redevelopment envisaged for the area. Conversely, landowner and developer responses emphasised the importance of flexibility, to not constrain development potential nor place limits on the amount or height of development in advance of more detailed design and planning. In response, it is noted that the Masterplan SPD sets the urban design framework and principles to guide development, but individual site proposals will also be judged on their merits and contribution to comprehensive regeneration of the area, plus be subject to further consultation at planning determination stage. It is also noted that NSGA is designated a Tall Building Zone due to existing and future high public transport accessibility. Proposed changes to the draft Masterplan SPD to address consultation responses on scale and height of development include adding a heights plan, new text to note that new development must adhere to Brent Design Guide privacy and amenity standards, and removal of references to maximum capacities in growth capacity study scenario options.

## **Infrastructure & Public Realm**

- 3.10 Responses include both resident and statutory consultee emphasis on the importance of ensuring regeneration and growth is supported by new and improved infrastructure, including transport infrastructure, community facilities, local amenities, green and open spaces, and prioritises local streets and public realm. In response, it is noted that the Masterplan SPD sets out the key infrastructure requirements for comprehensive regeneration of the area, and that the Council will provide further implementation detail in its Infrastructure Delivery Plan. It is also noted that the Masterplan SPD supports the London Plan approach to Healthy Streets, more active travel and a better public realm. Changes are proposed to add text to provide further detail necessary to secure proper transport infrastructure, sports facilities, utilities, green and open spaces.

## **Affordable Housing**

- 3.11 Responses include resident demands for truly affordable housing in Brent. In response, it is noted that new development coming forward in the area must adhere to London Plan and Brent Local Plan requirements. Social Rent and London Affordable Rent is expected to be the predominant form of affordable housing tenure delivered in new development, which factor in local earnings into rent setting and are considered best able to meet Brent's housing needs.

## **Severn Way / Selbie Avenue**

- 3.12 Severn Way and Selbie Avenue Residents Association (SWASARA) stated they are in favour of enhancement of Neasden Station and the proposed West London Orbital line, but noted that new housing must be supported by infrastructure and that new homes be affordable to local residents. SWASARA also raised concern Brent Council would use Compulsory Purchase Order (CPO) powers to acquire homes. Residents living in these streets also expressed concern that development would impact their natural light and privacy. In response, it is noted that the Masterplan SPD and Council's Infrastructure Deliver Plan set out the infrastructure required to support development. It is also noted that any redevelopment at Severn Way and Selbie Avenue is likely to be longer term, and that CPO is rarely used and outlined within the document as a mechanism of final resort when land assembly is challenging and landowners, developer and residents are unable to work together. To provide greater clarity a land ownership and phasing plan is now proposed to set out estimated delivery timescales over the short, medium and long term.

## **West London Orbital**

- 3.13 Responses from the Greater London Authority (GLA), Transport for London (TfL) and West London Alliance (WLA) all recognise increased connectivity benefits that would be provided by the proposed West London Orbital (WLO) line, and note that the draft Masterplan SPD preferred Option 3 as worded could be read to exclude the proposed WLO. In response, it is noted that all draft Masterplan SPD growth capacity scenarios safeguard the WLO, however testing is undertaken "without" and "with" the WLO, as it is anticipated that development in the area will outpace delivery of the WLO, which is also not guaranteed. It is however proposed to amend the text that the growth capacity scenarios test development "before" and "after" the WLO to make clear that no option excludes the WLO. It is also noted that the preferred urban design framework and principles for optimised co-location of residential uses that apply under Option 3 before the WLO is delivered, would equally apply under Option 6 were the WLO to proceed, with the infrastructure provision outlined also able to support the higher development capacities under Option 6. Further changes have added more spatial context and detail on the current status of the WLO, and marked the safeguarded WLO Station on all relevant maps.

## **Financial Viability**

- 3.14 Some landowner and developer responses query the financial viability of the Masterplan SPD Options. In response, officers note that they are satisfied viability has been robustly tested in line with national, regional and local policy, the Masterplan is viable for the bulk of the sites, and no changes are proposed.

## **National Highways**

- 3.15 National Highways (formerly Highways England) in responding to Brent's new Local Plan and the draft NSGA Masterplan SPD required that prior to adoption of the Masterplan SPD, the Council undertake a transport assessment to assess the impact of development upon the Strategic Road Network (SRN) and M1 Junction 1. Such study was undertaken and shared with National Highways, who confirmed 9<sup>th</sup> March 2022 that they are content that development within the NSGA will not have significant impact on the SRN and M1 Junction 1.

## **Other Changes**

- 3.16 Appendix 1 at 4.2 also lists additional editorial changes including to make text more accurate and consistent, clarifications, new maps and image labels.

## **4.0 Financial Implications**

- 4.1 NSGA Masterplan SPD costs were met from a Greater London Authority Homebuilder Capacity Fund grant and existing Regeneration budgets.
- 4.2 There are no financial implications in approving the adoption of the NSGA Masterplan SPD.

## **5.0 Legal Implications**

- 5.1 Town and Country Planning (Local Planning) (England) Regulations provide for Local Planning Authorities to adopt Supplementary Planning Documents. These documents are to provide more detailed guidance on how a development plan policy will be interpreted in the determination of planning applications. Supplementary Planning Documents cannot introduce new policy or allocate sites for development.

## **6.0 Equality Implications**

- 6.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have "due regard" to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.

2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
3. Foster good relations between people who share a protected characteristic and those who do not.

6.2 Statutory public consultation was carried out in the process of preparing and adopting the NSGA Masterplan SPD. Equality Analysis was undertaken in advance of consultation which identifies no negative impacts in relation to people with protected characteristics. The NSGA Masterplan SPD would be expected to have positive impacts on existing and new communities alike. The provision of affordable housing, workspace, public spaces and public realm is identified as having the potential to positively benefit people of all ages. The provision of accessible housing and the proposed WLO station is identified as having the potential to positively benefit people with disabilities.

## **7.0 Consultation with Ward Members and Stakeholders**

7.1 The Lead Member for Regeneration, Property and Planning was regularly briefed during development and consultation on the draft NSGA Masterplan SPD. Ward councillors from Dollis Hill, Dudden Hill, Welsh Harp and Willesden Green wards were regularly briefed during development and consultation on the draft NSGA Masterplan SPD.

7.2 Stakeholder engagement including with the Greater London Authority, West London Alliance, Transport for London, local landowners (including the College of North West London) and developers was undertaken during development and consultation on the draft NSGA Masterplan SPD. The Design Council peer reviewed the draft NSGA Masterplan SPD.

7.3 Statutory public consultation was undertaken for an extended period of 7 weeks in line with the relevant Regulation and as set out in this report.

## **8.0 Human Resources/Property Implications (if appropriate)**

8.1 Regeneration and Planning have developed the draft NSGA Masterplan SPD in-house.

**Report sign off:**

**Alan Lunt**  
Strategic Director of Regeneration &  
Environment