

CONSULTATION STATEMENT

Draft Neasden Stations Growth Area Masterplan Supplementary Planning Document (SPD) Consultation Statement, April 2022

This document sets out the public consultation that took place for the draft Neasden Stations Growth Area Masterplan SPD, summarises the representations received and the Council's response.



Appendix 1

Draft Neasden Stations Growth Area Masterplan Supplementary Planning Document (SPD) Consultation Statement April 2022

This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town & Country Planning (Local Planning) (England) Regulations 2012. It sets out details of the consultation that took place and which has informed and refined the Supplementary Planning Document (SPD).

• Background

Neasden Stations Growth Area (NSGA) is a priority Growth Area in the Brent Local Plan. NSGA aims to provide at least 2,000 new homes, employment and supporting infrastructure, including green space, transport, community facilities, and enhanced public realm. This vision will be achieved through redevelopment of an extensive area of under-used or surplus land to build a new residential community, incorporating in part the co-location of new industrial with residential. Through a master planning approach, the NSGA Masterplan SPD has been prepared to guide the comprehensive regeneration of the area.

The Masterplan SPD sets out the vision, policy context and the urban design framework comprising of development, sustainability and environmental principles that will guide future comprehensive development of the area. It gives a positive message that Brent welcomes and encourages new development of high-quality sustainable design, and recognises the benefits that it can bring to communities. It aims to assist developers, designers, local communities, planning officers and those determining planning applications to understand better what is expected of new developments in NSGA depending on its surrounding context and how regeneration can be achieved holistically.

• Area of coverage

NSGA comprises 11.5 hectares of land around Neasden Underground Station. The Growth Area is composed of six sites that are identified separately in the Masterplan SPD. These include three Locally Significant Industrial Sites (LSIS), which are the McGovern site, O'Hara site and the Falcon Industrial Estate. The three other sites are Dephna House and surplus London underground land site on Neasden Lane, the College of North West London (CNWL) site on Denzil Road including the residential area of Selbie Avenue and Severn Way, and a site including properties along the south-east of Neasden Lane including the former Neasden Service Station.

• Consultation

The draft SPD was subject to 7 weeks of formal consultation from **21 June 2021 to 9 August 2021**. This was in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community

Involvement (SCI). This Consultation Statement sets out the comments received, the Council's response and where appropriate consequential changes made to the SPD.

In accordance with the Council's SCI, during the consultation period, the following process was adhered to:

- The draft Masterplan SPD and details of the project and how to get involved were showcased on a dedicated website <https://www.brent.gov.uk/your-community/regeneration/growth-areas/neasden-stations-growth-area/>
- The draft Masterplan SPD, and an online feedback form were made available on a dedicated consultation portal.
- 1500 promotional flyers were distributed to residents and businesses in and around the NSGA. Individual flyers were also handed out during the four consultation events.
- The consultation was publicised via social media channels- Facebook, Twitter and LinkedIn.
- Hard copies of the draft Masterplan SPD were made available to view at Wembley and Willesden libraries, alongside copies of the feedback form.
- Stakeholders and groups on the planning consultation database were emailed, notified of the consultation and consultation events, and invited to comment and attend the consultation events.
- Dedicated consultation updates sent to all local ward councillors to promote the consultation and events
- Four drop-in sessions were organised at various locations around NSGA as shown in the table below. A dedicated drop-in session for the residents of Severn Way and Selbie Avenue was organised to answer specific concerns and queries regarding the draft Masterplan SPD.

Drop-in sessions

Monday 5th July 2021	3-6pm	Neasden Town Centre, near Neasden Parade, 263-265 Neasden Lane, NW10 0AA
Friday 9th July 2021	4-6pm	St Catherine's Church, Church forecourt, Neasden Lane, NW10 1QB
Thursday 15th July 2021	4-6pm	The Grange, Neasden Lane, London NW10 1QB
Saturday 11th September 2021	10-12am	Open space on Selbie Avenue, London NW10 2UT

A summary of comments received, together with any recommended changes to the Masterplan SPD can be found below. The draft NSGA Masterplan SPD together with this consultation statement were presented to Cabinet when it considered and adopted the SPD.

• Consultation responses and changes

36 responses were received from statutory consultees, locally active organisations and individual residents in and around the NSGA. 95 people including residents, statutory

consultees, developer team and other stakeholders attended the 4 consultation events. There were 1421 hits to the dedicated NSGA website, including 458 views of the NSGA Masterplan SPD page, 142 hits to the get involved page and 54 hits to the latest news section. The majority of the consultees responding were overall positive about the contents of the draft Masterplan SPD. There were some areas of concern which have been addressed in the Council's responses below. See 4.1 for Summary of responses and recommended changes for Draft NSGA Masterplan SPD.

4.1 Summary of responses and recommended changes: Draft NSGA MASTERPLAN SPD

The following format has been used to denote the **PROPOSED CHANGES**:

Bold text = Updated section details

Underlined bold text = new text proposed compared to draft consultation version

Strikethrough text = text proposed for removal compared to draft consultation version

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
1.	John Cox	Chapter 5: Tomorrow's Neasden Stations Growth Area; Pg. 50-53; Figure 18-23	Provide replacement images for page 50-53 that includes WLO station.	The WLO is shown on all masterplan capacity options marked as 'proposed WLO station' with a black logo (pg. 50-53). There are no replacement images. All images shown as part of the draft SPD are in the public domain.	5.2 Growth Capacity Study scenarios (pg.50-53): The legends on all Figures 18, 19, 20, 21, 22, and 23 in this section have been amended to reflect safeguarded WLO Station where it applies. This document is in the public domain and can be accessed via the NSGA webpage. Link to the same will be provided.
2.	Chris Queen	General	Lack of communication and not enough publicity of the consultation events. Lack of engagement from ward Councillors. Council avoiding scrutiny and rubber stamping scheme.	1500 consultation flyers, which included details of the events, were distributed to residents in and around the Neasden Stations Growth Area (NSGA). Four drop-in sessions were organised at various locations around NSGA to answer any concerns and queries regarding the draft SPD. Hard copies of the draft SPD were made available at both the Willesden and Wembley libraries. All the events were publicised on social media channels, including Twitter, Facebook and LinkedIn. A dedicated NSGA webpage and consultation portal webpage was available for collating feedback and responses. The consultation ran for a period of 7 weeks. The relevant regulation only seeks a minimum of 4 weeks of consultation on an SPD.	No change
	Chris Queen	General	Need for sensible regeneration. 2000 units next to Neasden Station not a solution. Need for independent planner to start to solve the problem with appalling road systems.	The SPD identifies the constraints and key infrastructure requirements for NSGA and seeks to guide developers, landowners, residents, planners, and everybody involved in the area's future comprehensive development to support regeneration. A separate infrastructure delivery plan is being prepared that identifies the delivery and implementation of infrastructure across the NSGA. This includes transport, community and green infrastructure for the next five-plus years.	No change
3.	Martin J Well	Draft SPD	Need for regeneration to come forward sooner rather than later.	The draft SPD Section 7 -Delivery showcases the developments that can come forward in the short, medium and long term. The timeframe is largely based on ownership consideration, with larger sites in single ownership expected to come forward for delivery earlier than multiple-ownership sites.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Martin J Well	Draft SPD	Concern regarding safety on public open spaces. Crime prevention measures should be taken. Need for road and transport infrastructure.	Section 6: Development Principle DP8: 'Safety, security and active frontage' requires developments to conform to the standards set within 'Secured by Design' (SBD) which incorporates designing out crime principles.	No change
4.	Pam Laurence	Draft SPD	Need for truly affordable housing with enough space.	The draft SPD Section 6.4 Development principles -DP4 New and affordable homes set out recommendations based on London Plan Policy H4 Delivering Affordable Housing and Brent Local Plan Policy BH5 Affordable Housing. Any development coming forward must adhere to the policy requirements set out in the London Plan and Brent Local Plan on affordability and mixed tenure developments.	No change
	Pam Laurence	Draft SPD	Access to their own outdoor space. Range of different kind of green space catering to different user groups, kids, youth, adults. Places for people to meet; pubs, bars, laundrettes, public seating, youth club spaces, places to practice cycling, parents and toddler groups etc.	Local Plan policy BH13 Residential Amenity Space sets out private amenity space standards that developments are generally required to meet. Section 6.5 Environment and sustainability principles ESP7: Open space and amenity recommend the need for new developments to provide a series of green open spaces and pocket parks accessible to the local community. We acknowledge the suggestions made regarding the kind of spaces and need for focused community activities. We will include these suggestions within the character area section that showcases future characteristics of the area. Please note that all development proposals on individual sites are subject to statutory consultation as they come forward for planning determination. This will be an opportunity for you to provide further feedback on the detailed proposals.	Text added: 6.2 character area: Future Character- para 6.2.14, 6.2.17, and 6.2.20 <u>Future development proposals must engage with the local community to determine the type of community functions and green spaces.</u>
	Pam Laurence	General	The public consultation at St Catherine's was disappointing as there were not enough people who could answer questions.	We appreciate your feedback on the consultation event at St. Catherine's Church, and it will be considered when organising future consultation events.	No change
5.	Ian Saville	Draft SPD	There is mention of affordable housing, but currently definitions make this unaffordable for a large proportion of Brent residents. Do you propose to peg rents to average salaries in Brent?	Section 6.4 Development principles -DP4 New and affordable homes set out the recommendations based on London Plan Policy H4 Delivering Affordable Housing and Brent Local Plan Policy BH5 Affordable Housing. Any development coming forward will need to adhere to the policy requirements within the London Plan and Brent Local Plan. Social Rent / London Affordable Rent is required as the predominant form of affordable housing tenure to be delivered in new development, which factors local earnings into their rent setting, and are considered best able to meet Brent's housing needs. Development may also provide for London Living Rent as part of the 'intermediate' affordable dwellings. The affordability of this product is set against average incomes set out annually by the GLA.	No change
	Ian Saville	Draft SPD	As well as providing walking/cycling routes, more needs to be done to actively discourage car and motor vehicle use, which causes major health problems.	The SPD promotes London Plan Policy T2 Healthy streets, supporting a modal shift to active travel in all new developments. Section 6.4 Development Principle DP7 Movement and accessibility requires car-free or car-lite development in areas with good public transport.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				Principle ESP2: Air quality requires development in Growth Areas to be air quality positive, minimising occupants' exposure to poor air quality.	
	Ian Saville	General	The public consultation at St Catherine's was disappointing as there were not enough people who could answer questions. Expecting detailed presentation.	Comments noted for future consultation. The drop-in sessions were not designed to give detailed presentation but an opportunity for an open discussion regarding the SPD. This allows for flexibility and everyone to participate. Please note individual development proposals within the NSGA would be subject to statutory consultation as they come forward for planning determination and which will be an opportunity to provide further feedback on detailed scheme proposals.	No change
6.	Marek Kaminski	General	Introduce multidisciplinary engineering consultancy firm (BRUENG Ltd) based here in Brent. Keen on growing our connections and exploring opportunities that we can offer our services.	Details passed on to the planning team to add to future mailing list for information regarding engagements on relevant projects. Recommend getting on Brent's Community Directory. Details will be passed to property directory. Please find link to the community directory: https://www.brent.gov.uk/your-community/community-directory/	No change
7.	Altaf Choudary; Ali Gamal, Stephen Daku and Mike Evans	Draft SPD	Consultation events need to be on a weekend to allow transparent engagement.	All consultation events were organised in the evening between 4-6pm. An additional dedicated event was also organised on a Saturday for residents of Severn Way, Selbie Avenue and Denzil Road, and which was also attended by local ward councillors.	No change
	Altaf Choudary; Ali Gamal, Stephen Daku and Mike Evans	Draft SPD	Resident of Severn Way pushed in an enclave of high rise buildings. Direct invasion of any natural light and privacy. Opposition to blocks built immediately behind Severn Way next to national rail casting shadows 24/7. Little consideration made for residents of Severn Way.	NSGA is identified as a Tall Building Zone because of existing and future high public transport accessibility (with the WLO) and potential for optimising industrial land through intensification and residential co-location, making efficient land use to meet housing and employment needs. The Brent Local Plan and Brent's Tall Building Strategy recognises the area within NSGA to be appropriate for tall buildings. Policy BD2 Tall Buildings in Brent, Policy BP2 East and Policy BEGA1 NSGA requires a master planning process to inform the heights within the NSGA area and tall buildings to step down to form a comfortable relationship with adjacent surroundings. The draft SPD conforms to these policies and guides future comprehensive developments of the area. However, it does not prescribe a detailed design for the sites. Heights and massing will be assessed when individual schemes come forward for planning permission. Please note that all development proposals seeking planning permission will be subject to statutory consultation. This will be an opportunity to provide further feedback on the detailed proposals. Section 6- Urban Design Framework 6.2.14 within the draft SPD clearly states that building heights should step down to Dudden Hill Lane and Selbie Avenue. Adequate setbacks and street widths need to be considered as part	5.2 Growth Capacity Study Scenario: Included heights plan within preferred co-location option 3 6.2 Character Areas: Character Area Tables 14 (College Green) and 15 (Denzil Road)- Building type, heights and massing: - <u>All new developments must adhere to Brent Design Guide SPD1 principles for privacy and amenity.</u>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				of any future proposal. The point made on appropriate heights needing to be set out more clearly within the SPD is accepted. We will include a heights plan within our preferred option- optimised co-location option 3 and reference to Brent Design Guide SPD1 principle on privacy and amenity spaces in Table14 and 15 College Green and Denzil Road character area table that set out sun orientation and shadowing standards with respect to building type, heights and massing.	
	Altaf Choudary; Ali Gamal, Stephen Daku and Mike Evans	Draft SPD	Ask to be consulted further and be involved in any decisions that will impact the neighbourhood.	We will add your details to our consultation database so you will be informed of future consultations.	No change
8.	Steve Atkinson	Draft SPD	Support the vision and values set within the draft NSGA masterplan SPD.	We welcome your support of the draft SPD.	No change
	Steve Atkinson	Draft SPD	A lido would be nice.	Inclusion of a LIDO would depend on the market interest and discussions with landowners/developers at the time of planning application. Please note detailed schemes on individual sites will be subject to further statutory consultation and engagement with residents and community when they come forward for planning determination.	No change
	Steve Atkinson	Draft SPD	Prioritise open space and parks, streets and public realm, and Public transport accessibility. Support the development, environment and sustainability principles set within the SPD.	The SPD sets out the development requirements in section 6.3 . It also sets out principles for open space and parks, street and public realm and improvements to public transport accessibility. Please refer to Principle DP1, Principle DP7, Principle DP8 and Principle ESP7 . We welcome your support of the environment and sustainability principles.	No change
9.	Sue Arnold and Helen Grunberg	Draft SPD	Agreement that Neasden is sadly in need of regeneration. I would like to see the land used as set out in your vision. I look forward to more comprehensive plans in the future.	We welcome your support of the draft SPD.	No change
	Sue Arnold and Helen Grunberg	Draft SPD	All the housing should be affordable and the height kept to no more than six storeys.	Section 6.4 Development principles -DP4 New and affordable homes sets out recommendations based on London Plan Policy H4 Delivering Affordable Housing and Brent Local Plan Policy BH5 Affordable Housing. Any development coming forward will need to adhere to the policy requirements as set out in the London Plan and Brent Local Plan on affordability and mixed tenure developments. Section 6.4 Development principles -DP4 New and affordable homes set out recommendations based on London Plan Policy H4 Delivering Affordable Housing and Brent Local Plan Policy BH5 Affordable Housing. Any development coming forward will need to adhere to the policy requirements as set out in the London Plan and Brent Local Plan on affordability and mixed tenure developments. NSGA is identified as a Tall Building Zone because of existing and future high public transport accessibility (with the WLO) and potential for optimising industrial land	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Sue Arnold and Helen Grunberg	Draft SPD		through intensification and residential co-location, making efficient land use to meet housing and employment needs. The Brent Local Plan and Brent's Tall Building Strategy recognises the area within NSGA to be appropriate for tall buildings. Policy BD2 Tall Buildings in Brent, Policy BP2 East and Policy BEGA1 NSGA requires a master planning process to inform the heights within the NSGA area and tall buildings to step down to form a comfortable relationship with adjacent surroundings. The draft SPD conforms to these policies and guides future comprehensive developments of the area. However, it does not prescribe a detailed design for the sites. Heights and massing will be assessed when individual schemes come forward for planning permission. Please note that all development proposals seeking planning permission will be subject to statutory consultation. This will be an opportunity to provide further feedback on the detailed proposals.	No change
	Sue Arnold and Helen Grunberg	Draft SPD	Also it is very important that the infrastructure is in place to support all this extra housing.	The SPD sets out the development and infrastructure requirements in section 6.3 Development Amount that consider the future infrastructure needs of the Area.	No change
	Sue Arnold and Helen Grunberg	General	Handouts confusing.	Comments noted and will be considered for future consultations.	No change
10.	Blair Thorpe	Draft SPD	Support the vision and values set within the draft NSGA masterplan SPD.	We welcome your support on the draft SPD.	No change
	Blair Thorpe	Draft SPD	Prioritise streets and public realm. Sensible bike storage and secure bike parking.	The SPD sets out the principles and requirements for street and public realm within DP7 Movement and accessibility and the character area section 6.2 for each of the sites. The SPD supports car-free or car-lite developments, and the need for bike storage and secure bike parking will be a key requirement for any future proposal. Principle DP7 sets out the approach for sustainable travel and cycling in line with London Plan Policy T5 Cycling and Brent Local Plan Policy BT1 Sustainable Travel Choice. Para 6.4.25 and Principle DP7 recommendation requires that new developments facilitate walking and cycling by providing safe cycle routes, secure storage within buildings, and cycle parking within the public realm.	No change
	Blair Thorpe	Draft SPD	<p>Pocket parks are not viable long term and do not provide a real green space, would rather fewer but larger parks especially where they are buffer to railway tracks or busy road (north circular).</p> <p>Trees space big enough to plant specimen large trees. Silver birches might be native to the UK but they are a pioneer trees thus short lived and do not form good looking strong tree.</p>	<p>The SPD promotes a series of green open spaces in the form of pocket parks and local public open spaces depending on the location and size of the sites. This presents a more viable option, especially in areas with Tall Buildings, as it helps create places of interaction and animates the spaces with breaking long building frontage.</p> <p>The draft SPD sets out the guidance for future comprehensive development of the area. Please note individual development proposals within the NSGA would be subject to statutory consultation as they come forward for planning and will also be an opportunity to provide</p>	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				detailed feedback on the proposal. Details such as kind of parks, sun orientation, buffers to railway, tree species will be considered when detailed schemes come forward for planning.	
	Blair Thorpe	Draft SPD	Quality of building design with appealing/interesting roof profiles not just flat boxes. Support the development, sustainability and environmental principles associated with the building skyline, this is especially important with tall buildings as they are dominant against the sky. Past buildings had chimneys, parapet, cornices, dormers, and pitched roof that "broke up" the roofline and sky line to make it visually interesting. There is an importance of the roof design. Residences need to be sun orientated.	The SPD is underpinned by our values (section 2.3), which outlines design quality and materiality for future NSGA developments. The character area section 6.2 further supports the need for an animated skyline with a range of densities adding visual appeal. Developments will need to refer to Brent Design Guide SPD1 that set out guidance on sun orientation.	No change
11.	James Edholm	Draft SPD	Support the vision, especially the proposed crossing across of the railway.	We welcome your support of the vision and values set out within the draft SPD.	No change
	James Edholm	Draft SPD	Prioritise social and community, walking and cycling routes.	<p>The SPD in DP6: Social infrastructure and community needs outline the principles and requirements for social and community facilities as below:</p> <ul style="list-style-type: none"> - Development should support the provision of new multi-functional community facilities (see Section 6.3); - Development within Site 3 must provide a neighbourhood centre to accommodate the co-location of social infrastructure and community uses; - Development should contribute towards the reconfiguration, upgrade and expansion of clinical space in existing facilities within the borough, secured by the Council through planning obligations; - Development should support safe and sustainable access to existing schools, surgeries and community facilities outside NSGA. <p>Walking and cycling routes are outlined in DP7 Movement and accessibility. Additionally, an Infrastructure Delivery Plan is being prepared for NSGA that identifies the site-specific and strategic infrastructure needs and delivery/implementation mechanism for; transport, social/community and green infrastructure for NSGA and wider areas.</p>	No change
12.	Resident	Draft SPD	Generally supportive of regeneration of Neasden. It's a great area, but could benefit from regeneration.	Comments noted. We welcome your support for regeneration within NSGA. The draft SPD sets out the vision, values and principles that provide guidance on the comprehensive regeneration of the area.	No change
	Resident	Draft SPD	Prioritise public transport accessibility.	The draft SPD identifies the opportunities and infrastructure needs that will help improve the public transport accessibility of NSGA. Section 6.4 Development principle DP7: Movement and accessibility , within the draft SPD, further sets out principles for improving accessibility via public transport	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				and safe walking/cycling routes. The future provisions for a West London Orbital link will further help in improving the accessibility to the wider area.	
13.	Rita Francesca Valentini	General	Safety especially at night is an issue currently. Streets abandoned, dirty and poor lighting. Harassment by the drugged and alcoholic. Better maintenance of street and need for street lighting. Problems with fly tipping and rubbish. People will move to Neasden only when if safe and there are clean areas.	Comments noted. Principle DP8: Safety, security, and active frontage requires developments to provide a safe environment and design out crime as part of the design process. Developments will need to conform to the standards of Secured by Design (SBD) and Approved Document Q of the Building Regulations 2010. This will help create safe environments that people want to occupy and use, creating a strong and positive sense of community identity. Whilst the SPD seeks to improve the area in terms of safety, crime prevention, fly-tipping and public realm improvements, by setting out principles that will help to better the area, it alone cannot resolve cleanliness and social behavioural issues.	No change
	Rita Franscesca Valentini	Draft SPD	It should be a socially diverse area with mix of private and social rent.	Section 6.4 Development principles -DP4 New and affordable homes set out the recommendations for affordable and new housing. Any development coming forward will need to adhere to the policy requirements as set out in the London Plan and Brent Local Plan.	No change
	Rita Franscesca Valentini	Draft SPD	Prioritise open space and public realm, public transport accessibility, street and public realm, walking and cycling routes and safety. It needs safe walking routes to transport hubs. Better connection to central London (Jubilee is good) and Metropolitan should stop at Neasden. Improved accessibility to London.	The draft SPD sets out principles and infrastructure requirements for open spaces and parks, public realm improvements and walking cycling routes to guide future development in the area. Regeneration and new development will also contribute to local infrastructure improvements. Please refer to Principle DP1 Maximising the potential for the sites, Principle DP7 Movement and accessibility, Principle DP8 Safety, security and active frontage and Principle ESP7 Open space and amenity . The West London Orbital link proposals are identified as an opportunity to improve public transport accessibility to the wider area. The remit of the draft SPD does not include identifying a new Metropolitan Line stop at Neasden, but we recommend getting in touch with TfL, who will clarify such transport-related queries.	No change
	Rita Franscesca Valentini	Draft SPD	Support for sustainability and environmental aspects.	We welcome your support on the environment and sustainability principles.	No change
	Rita Franscesca Valentini	General	Poor reputation of Neasden. Make sure to renovate all Neasden. Areas in Neasden really need some serious refurbishment and also to avoid ghettos and ensure a better mix.	Comment noted. The draft SPD sets out the vision and values for NSGA in Chapter 2 , the type of place Neasden can be in the future and the qualities it can possess to guide future comprehensive development of the area.	No change
	Rita Franscesca Valentini	General	Additionally the area requires a gym and a supermarket.	Please note individual development proposals within the NSGA would be subject to statutory consultation as they come forward for planning which will be an opportunity to provide further feedback on detailed proposals, such as provisions for gyms and supermarkets.	No change
14.	Sam Myers	Draft SPD	Support for the vision and values within the draft NSGA masterplan SPD.	Comments noted. We welcome your support for the vision and values set out within the draft SPD.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Sam Myers	Draft SPD	Prioritise open space and parks, public transport accessibility, walking and cycling routes.	Figure 2 'Vision Map' and Principle DP1 Maximising potential for the sites outlines our approach to comprehensive development across the NSGA. Principle ESP7 Open space and amenity sets out the principles and requirements for open space and parks, and Principle DP7 Movement and accessibility outlines the principles that would improve public transport accessibility through provision of walking/cycling routes, bus and rail links. Additionally, the future provision of the WLO would further enhance accessibility to the wider areas.	No change
15.	Vic Deslink	Draft SPD	Support for the vision and values. Prioritise public transport accessibility.	Comments noted. We welcome your support of the vision and values underpinning the draft SPD and the need for regeneration. Section 6.4 Development principle DP7: Movement and accessibility , within the draft SPD outlines the principles that would improve public transport accessibility by providing walking/cycling routes and bus/rail links. Additionally, the future provision of the WLO would further enhance accessibility to the wider areas.	No change
	Vic Deslink	Draft SPD	<p>Support for the principles but concerned about my home disappearing in Phase 3a. Time lines for each of the phases would be very helpful.</p> <p>While I do agree in principle for the significant development outlined in Phases 1 to 3, forcing residents out of their homes as indicated in Phase 3a for the sake of one additional high rise is overly aggressive and indicates greed and contempt for many of us that have lived very happily in this neighbourhood for more than two decades!</p> <p>As stated previously, we are fully in support of Phases 1, 2 and 3. It is a great idea and much needed an area that has remained stagnated for a lengthy period of time!</p>	<p>Comments noted. We welcome your support of the vision and values underpinning the draft SPD and the need for regeneration. It is recognised that the inclusion of Severn Way and Selbie Avenue properties within the site allocation may be of concern to existing residents. However, the borough's housing needs and targets set in the London Plan are very high compared to historic levels. This, together with national policies and those within the London Plan, which promote the most effective use of land near railway stations, has meant that the Council has had to consider the potential of sites with higher levels of public accessibility in the borough to be used much more intensively.</p> <p>The existing and potential public transport improvements in this area, together with the obvious availability of large areas of land around the stations for redevelopment, has resulted in the identification of the Neasden Stations Growth Area. This is not unlike numerous other parts of the borough where people currently live, which from a planning policy perspective, are acceptable for redevelopment for more intensive residential development. Currently, as set out in the SPD, it is not considered likely in the short to medium term that the Selbie Avenue/ Severn Way estate will come forward for comprehensive redevelopment. Although many of the homes are still owned by the Council, other sites are more of a priority for delivering greater intensity of use of land to accommodate much needed affordable homes. The Council in regeneration schemes at South Kilburn has engaged with occupiers and leaseholders throughout the renewal process. It has offered better quality homes for tenants and options for leaseholders either on-site or through financial compensation that more than adequately</p>	Section 7- Delivery- Figure 29: Include timeline in years (0-20+ yrs) for short/medium and long term on phasing plan with: Short term- 0-10 yrs, Medium-10-15 yrs, Long term- 15-20 yrs.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>addresses needs. The Council will always look to work with existing tenants/ property owners to effectively address any issues through co-operation and agreement, rather than the compulsory purchase alternative, which is rarely used. The allocation in the Local Plan and the development that comes forward on adjacent sites is likely to increase property values considerably above those that currently exist as the area's potential is realised, to the benefit of existing property owners.</p> <p>Section 7 on Delivery shows the phasing plan from 0 to 20+ years within NSGA. However, the phasing plan in section 7 will be updated to show the timeline for the short/medium and long term.</p> <p>Please note individual development proposals NSGA are subject to statutory consultation as they come forward for planning determination. This will be an opportunity to provide further feedback on detailed scheme proposals as they come forward.</p>	
16.	Ville Koskinen	Draft SPD	The draft SPD is a great assessment of the needs, requirements and restrictions of the area.	Comments noted. We welcome your support of the draft SPD and the principles set out within the document.	No change
	Ville Koskinen	Draft SPD	Pleased to see walking and cycling planned into the proposals. Prioritise public transport accessibility, Walking and cycling routes. Agree with the principles.	The SPD prioritises public transport accessibility and need for walking cycling infrastructure. Principle DP7 Movement and accessibility outlines the principles that would improve public transport accessibility through provision of walking/cycling routes, bus and rail links. Welcome support of the principles.	No change
	Ville Koskinen	Draft SPD	Concerned about the height of the proposed high-rise buildings. They would be the tallest buildings around. Has the issue with shadows and obscuring sunlight been considered? Considering the current difficulties with cladding in high-rise buildings, are developers interested in the proposals?	<p>Local Plan Policy BEGA1 and the Tall Building Strategy 2020 identify NSGA as a Tall Building Zone with heights ranging from 4-20 storeys. This is because of existing and proposed public transport accessibility (with the WLO) and potential for optimising industrial land through intensification and residential co-location, making efficient land use to meet housing and employment needs. The Tall Buildings Strategy provides flexibility on heights and anticipates further analysis associated with the master planning can inform potential building heights in the growth area.</p> <p>The draft SPD conforms to the policy and strategy and guides future comprehensive developments in the area. Section 6.2 character area within the SPD provides details on the future characteristics of the area. It requires buildings to step down to respond to the surrounding context. However, the draft SPD is a guidance document and does not prescribe the detailed design for the sites. Individual schemes will be evaluated when they come forward for planning determination and will need to meet the standards for sunlight/shadowing, cladding etc.</p>	<p>6.2 Character Areas: Character Area- Tables 14 (College Green) and 15 (Denzil Road)-</p> <p>Building type, heights and massing- All new development must adhere to Brent Design Guide SPD1 principles for privacy and amenity.</p>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				We welcome your support for the enhancement of Neasden Station and the proposal for the West London Orbital link. Suggestions noted. Details such as northern public entrance/exit with barrier may be a consideration when detailed proposals for the sites come forward for planning. The draft SPD identifies the constraints to the movement network and principle DP7: Movement and accessibility recommend developments to prioritise active, efficient and sustainable transport choices, with a particular emphasis on improving conditions for pedestrians and cyclists. Section 6 sets out the development principles, and Section 6.3 sets out the development amount specific to the sites. Section 9.6 discusses the CIL/S106 obligation and considerations for schemes when they come forward for planning permission. The draft SPD identifies the planned infrastructural requirements for the area, which future proposals must take into consideration while planning for individual sites within the NSGA.	
17.	Severn Way and Selbie Avenue Residents' Association (SWASARA)	Draft SPD	In favour of the enhancement of Neasden Station and the proposal for this to expand to embrace the little-used freight line that goes above Neasden Lane. Improve transport infrastructure to in NW London Area. Need for a northern public entrance/exit with barriers could accompany the exit north of Neasden Station to expedite access and egress to the Mandir, and the housing around the Ironbridge. More and better linked pedestrian cycle ways, particularly alongside busy roads, (Neasden Lane), and also between Willesden and Wembley, Also pertaining to the NSGA developments as these aspirations will I hope be included in the CIL obligations of those investing in these housing developments.	We welcome your support for the enhancement of Neasden Station and the proposal for the West London Orbital link. Suggestions noted. Details such as northern public entrance/exit with barrier may be a consideration when detailed proposals for the sites come forward for planning. The draft SPD identifies the constraints to the movement network and principle DP7: Movement and accessibility recommend developments to prioritise active, efficient and sustainable transport choices, with a particular emphasis on improving conditions for pedestrians and cyclists. Section 6 sets out the development principles, and section 6.3 sets out the development amount specific to the sites. Section 9.6 discusses the CIL/S106 obligation and considerations for schemes when they come forward for planning permission. The draft SPD identifies the planned infrastructural requirements for the area, which future proposals must consider while planning for individual sites within the NSGA.	No change
	Severn Way and Selbie Avenue Residents' Association (SWASARA)	Draft SPD	Real commitment that the materialisation of the necessary support infrastructure is in place before or at least alongside the time that the residents move into new housing , so that the increase in traffic and human activity in the area does not put additional strain on the transport network, local shops, and services such as schools and health services. New homes to be affordable to local residents.	Figure 2 vision map (pg. 21) identifies improvements to links to the wider area, including provisions for future links across the railway corridor and improving pedestrian/cycling routes to the Mandir. Additionally, an Infrastructure Delivery Plan is being prepared that identifies the site-specific and strategic infrastructure delivery to the NSGA Growth Area including, transport, social/community and green infrastructure delivery. Section 6.4 Development principles -DP4 New and affordable homes set out the London Plan and Brent Local policy requirements and subsequently the recommendations for new and affordable homes and tenure mix in NSGA.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Severn Way and Selbie Avenue Residents' Association (SWASARA)	Section 7.5 Compulsory Purchase Order (CPO)	Regarding the layout, against my home being demolished , as was cited as a possibility in the SPD (section 7.5 states "...Where necessary the [Brent] Council will ...consider the use of Compulsory Purchase Order (CPO) powers to secure the proper phasing and delivery of development within the growth area [NSGA] . ") Idea of homes being possibly earmarked for removal is a major mental distress and we have variously invested a lot of time and money into improving our own patch.	The need to accommodate homes and employment is significant, and the Council, through its Local Plan, has identified key Growth Areas in the most sustainable locations. Section 7 -Delivery shows the phasing plan from 0- 20+ years within NSGA. This area is identified as longer-term delivery. Please note individual development proposals within the NSGA would be subject to statutory consultation as they come forward for planning determination. Section 7.5 Compulsory Purchase Order is outlined within the document as a mechanism that the Council undertakes as a final resort where the land assembly is challenging, and the landowners/ developers/ residents are not able to work together. As an example, the Council in regeneration schemes at South Kilburn has engaged with occupiers and leaseholders throughout the process of renewal and has been able to offer better quality homes for tenants and options for leaseholders either on-site or through financial compensation that more than adequately address needs. The Council will always look to work with existing tenants/ property owners to effectively address any issues through co-operation and agreement, rather than the compulsory purchase alternative, which is rarely used. The allocation in the Local Plan and the development that comes forward on adjacent sites is likely to increase property values considerably above those that currently exist as the area's potential is realised, to the benefit of existing property owners.	No change
18.	Natural England	ESP4: Ecology, arboriculture and urban greening	Supportive of the recommendations put forward in ESP4 relating to urban greening and ecology. However, we feel this policy could be strengthened through a recommendation relating to Biodiversity Net Gain, and the need for all developments to provide the required net gain in the likely event that net gain becomes mandatory. Further to this, we have no specific comments to make on the SPD, but advise you to consider the following issues: Green Infrastructure in line with GI strategy, biodiversity enhancement, landscape enhancement, other design consideration and principles as per NPPF, strategic environmental assessment/habitats regulations assessment.	Comments noted. We welcome your support on the draft SPD and Principle ESP4 . Para 6.5.13 supports a positive contribution to biodiversity. In addition, Para 6.5.14 references Brent Local Plan Policy BG11 Green and Blue Infrastructure in Brent that requires development proposals to achieve a net gain in biodiversity. However, to ensure sufficient weight is given, reference to a net gain in biodiversity will be added within the Principle ESP4 recommendations . In addition, the inclusion of the reference to the Defra Biodiversity Metric and other tools is also considered appropriate.	6.5.14. Brent Local Plan Policy BG11 Green and Blue Infrastructure in Brent require that development proposals achieve a net gain in biodiversity. <u>Applicants should use tools to measure and account for biodiversity losses and gains, such as the DEFRA Biodiversity Metric, Small Sites Metric (SSM) and Environmental Benefits from Nature Tool (EBNT).</u> Added new recommendation to Principle ESP4: Ecology, arboriculture and urban greening: <u>Development should consider biodiversity in the wider site design and aim to secure biodiversity net gain.</u>
19.	National Grid	Draft SPD	We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.	Comments noted.	No change
20.	Historic England	Draft SPD	Absence of heritage assets within the Growth Area. Welcome the urban design approach set out in the draft SPD. Comments are limited in nature. However stress that given the potential heights of new development across some of the	Welcome support of our urban design approach. The draft SPD has been informed by the Tall Building Strategy and the Brent Design Guide SPD1. Any likely impacts of	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			component sites, it will be important to ensure that appropriate assessment and understanding of likely impacts on areas beyond the Growth Area itself are part of the process.	development on areas beyond the Growth Area can be looked at as part of the planning application process.	
	Historic England	Chapter 3: Planning policy overview, Chapter 6: Urban Design Framework	As a result, we consider that policies BD1 (Good Urban Design) and BD2 (Tall Buildings) should be included in section 3.1 Planning Policy Overview, so that all stakeholders are clear of their importance in the process of designing such buildings and ensuring that no adverse impacts occur as a result of their development. A clear requirement for tall building proposals should consider and avoid adverse impacts beyond the sites in question wherever possible should be included within bullet point three of DP1 at page 65.	We have included reference to Brent Design Guide SPD1 and Tall Building Strategy 2021 in section 3.1.13 Other Relevant Planning Policies and Guidance. The SPD should be read in conjunction with these policies while planning for individual sites. We agree that the SPD should provide a height plan consistent with the Tall Buildings Strategy recommendations to provide further guidance to future proposals. We will include a recommendation for tall building proposals to avoid adverse impact within the 6.2 Character Area section and para 4.6.4 .	Section 5.2 masterplan capacity study scenarios: Add heights plan in Preferred optimised co-location Option 3 New text: 4.6 Environment-Heritage 4.6.4 <u>Additionally, NSGA has been identified for 'Tall Buildings' and any development must respond and plan for impacts on surrounding townscape.</u> 6.2 Character Area section - Character Area tables 13, 14, 15, 16, and 17: Add new text considering adverse impacts of tall buildings as below: <u>Tall Buildings within developments must consider the potential for adverse impact on the surrounding townscape and respond appropriately to mitigate such impacts.</u>
21.	Sport England	DP5 Recreational needs	DP5 recommendation- Sport England welcomes the intention to provide new facilities or retain the existing however in order to align with national policy and Sport England Policy the existing facilities should be retained/improved unless strategically identified as surplus to the borough's current and future needs and any new provision should meet any existing deficit of provision within the borough or meet projected future needs. Highlight that there could be a need to retain the existing facilities and provide new provision. Strongly recommends that the wording in DP5 Recommendations is amended to reflect this position so that the SPD is compliant with the NPPF, in particular paragraph 99.	Principle DP5 recommendations require CNWL Site 3 to provide new or retain existing indoor and outdoor sports facilities, including MUGAs/outdoor gyms. CNWL site will deliver a comprehensive mixed-use development. Given London Plan's approach to making the best use of land and Policy D3 Optimising site capacity through a design-led approach, it is considered inappropriate to retain existing sports facilities that might prove to be a constraint to the development of the site. As a result, whilst sports facilities will be required under redevelopment; the determination of whether it is appropriate to retain as it is or re-provide onsite or elsewhere will be based on the assessment of future needs. The Local Plan evidence-based will inform the type of sports facilities to be delivered as part of comprehensive development. The Council's Local Plan evidence base: Open Space, Sports and Recreation Study 2019 assess the current supply and demand factors and considers the potential impact of forecast population growth on future facility needs of the borough. The Indoor Sports have informed the study and Leisure facilities needed assessment in November 2018. Whilst the assessment recognises a	DP5 Recommendations: - Development on Site 3: C N W L should provide new or retain existing indoor and outdoor sport facilities including M U G As/outdoor gym. <u>The re-provision of the sports facilities should be informed by local need identified in Local Plan evidence base, through public engagement and in partnership with Sport England;</u>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>deficiency in the sports hall and swimming pools borough-wide, the need for such facilities may change based on local need and type of future occupancy of residents.</p> <p>Sport England's recommendation is considered acceptable that Principle DP5 should identify how the need for the sports facility will be informed. This will be through the Council's evidence base, public engagement with the local residents and in partnership with Sport England at the time of submitting the planning application.</p>	
	Sport England	DP6: Social infrastructure and community needs	<p>DP6 Recommendations- It appears that a 'standards' approach would be adopted regarding the provision of community facilities. Sport England does not support a generalised 'standards' approach as it does not take into consideration the local need for a specific facility in the area. Any new, or retained, facility should be based on robustly identified needs that would then ensure that any facility would be sustainable in the long-term. Strongly suggests DP6 Recommendations are reconsidered so that new sports facilities informed by robustly identified local needs are fully delivered.</p>	<p>The draft SPD identifies the social infrastructure and community needs within principles DP6 and sets out the principles that future developments must adhere to while planning for social and community infrastructure. The approach to community needs must be determined through engagement with the local residents and communities. This will allow for site-specific response and community participation and avoid a 'standard approach'. Individual schemes will need to engage early with the community to understand specific local needs and address them within their detailed design proposal when they come forward for planning.</p>	No change
	Sport England	DP6 Social infrastructure and community needs	<p>Recommend links between the SPD draft and Active Design are developed further and are really drawn out in the SPD by having clear references to Active Design, its principles and the Active Design Checklist within the SPD. Active Design principles and the checklist could be added to any design requirements for proposals. More information on Active Design, including the guidance, can be found via the following link; and http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/activedesign/</p>	<p>The draft SPD embraces some of Active Design principles within its underpinning values and development principles but does not make particular reference to the Active design checklist. DP6 recommendations will be amended to refer to the Active Design checklist.</p>	<p>6.4 Development Principles- DP6- Social infrastructure and community needs:</p> <p>DP6 recommendation text:</p> <ul style="list-style-type: none"> - <u>Developments must plan for active design. Please refer Active Design checklist:</u> <u>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/activedesign/</u>
22.	West London Alliance (WLA)	General	<p>Extremely grateful for the extensive discussions with your team during the preparation of the draft Masterplan and for the recognition of the importance of the WLO that runs through it. A plan-led, masterplan approach of the kind you are taking in Neasden is an important element in ensuring both that the benefits of the project are maximised and that the case for the WLO can be clearly demonstrated. Agree Neasden is a place with considerable potential and support the ambitious approach the Council is proposing – strongly welcome the recognition of the importance of the WLO in helping to deliver it.</p> <p>The draft Masterplan sets out in clear, practical terms how the WLO will support delivery of these objectives in Neasden – and the Council's vision for the Growth Area set out in paragraph 2.1.1. Strongly support both the Vision and the objectives set out in section 2.2 to deliver it – in particular the objective to maximise the benefits of the WLO line and to</p>	<p>We welcome your support on the plan-led masterplan approach for the draft NSGA masterplan SPD and thank you for engaging with us during its preparation. The SPD recognises and acknowledges the opportunities and benefits the WLO will bring to NSGA. We welcome support on the Council's vision for growth in NSGA, and the vision and objectives set out within the draft NSGA Masterplan SPD to realise this.</p>	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			support closer working between TfL, the WLA and other stakeholders to unlock the potential of key development sites.		
	West London Alliance (WLA)	Para 2.4.3	Paragraph 2.4.3 might refer to the Great West Corridor Opportunity Area alongside the others served by the WLO. This may be of particular importance in giving media and tech occupiers of workspace in Neasden better access to the strategic cluster of these sectors in the “Golden Mile” in Hounslow. The Opportunity Area could also be shown in figure 3 .	We can include reference to the Great West Corridor opportunity Area in the text for para 2.4.3 and access to wider opportunities with improved public transport accessibility. However, Figure 3 is a high-level diagram taken from the Mayor's Transport Strategy 2018 and shows the strategic route of the WLO. At this scale, reference to the individual opportunity areas has not been made in the transport strategy; hence, we cannot show this in fig 3 .	Para 2.4.3: Add Text: <u>2.4.3: The WLO will help improve access to 'Great West Corridor Opportunity Area' and other opportunity areas accessed via the WLO route.</u>
	West London Alliance (WLA)	Chapter 4: Para 4.4.6	In paragraph 4.4.6 it may be better if reference was made to the WLO serving a station at Old Oak Common Lane to avoid confusion with the nearby Old Oak Common station that will serve the Elizabeth line and HS2.	Para 4.4.6 will be amended to reflect Old Oak Common Lane.	Para 4.4.6: Amended to reflect <u>Old Oak Common Lane</u> in place of Old Oak Common
	West London Alliance (WLA)	Chapter 4: Figure 16	Figure 16 identifies two “poor nodes”, one of which covers the proposed location for the proposed WLO station on Neasden Lane. The text does not explain what is meant by this term and it might be helpful to explain it so the issues involved can be taken into account in developing proposals for the station.	Figure 16 identifies poor nodes as a constraint to the movement network in connection with traffic conflicts and pinch points, and as such, do not impact the WLO station design proposal.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	West London Alliance (WLA)	Chapter 5: pg. 53	On page 53 , it might be helpful to be clear in the first paragraph of the “Preferred Option” that Option 3 is the best with the WLO as well as before. This is made clear in the “Summary” box, but as it stands the wording may be slightly ambiguous.	Since the delivery of the WLO is not guaranteed at this point, and the Council must plan for development outpacing its delivery, our preference is for optimised co-location option 3, the quantum of development that can be achieved before the WLO comes forward. The text in sections 5.1 and 5.2 pertaining to growth capacity will be amended as “before” and “after” the WLO. Additionally, the preferred option text and summary box (pg. 53) will be revised to justify our preference at this time. The Council remains supportive of the WLO; option 3 safeguards land for the WLO if it were to come forward and provides flexibility if the circumstances were to change. Section DP7 (pg. 68) require development proposals to contribute to the proposed WLO line.	<u>5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development. Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcome with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic with more vulnerable uses. The Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for developments outpacing its delivery. Therefore at this time, the optimised co-location option 3 before the WLO will inform the design principles and assumed quanta of development of schemes that come forward for development in short to medium term. Consequently, the urban design framework set out in Section 6 is based on Optimised co-location option 3. Should it be evident that the WLO will proceed, it is likely that the SPD will be reviewed. Prior to this review occurring, option 6 would form the basis of changed assumptions about potential development capacity on individual sites.</u>
	West London Alliance (WLA)	Chapter 6: pg. 62, Site 1 Development Amount table	In the table on page 62 dealing with the McGovern site, it may be worth mentioning that the proposed WLO station will have to meet relevant requirements and guidance about station accessibility. It will also be important that the station entrance is clearly visible from the street.	Table for Site 1 (McGovern Yard Site) pg. 62 will be amended to reflect suggestions for the proposed WLO station to meet relevant requirements and guidance about station accessibility and that the station entrance is visible from the street.	Table for Site 1 (McGovern Yard site) pg.62 Transport infrastructure- Add text <u>Proposed WLO station to meet relevant requirements and guidance regarding station accessibility. The station entrance must be clearly visible from the street.</u>
	West London Alliance (WLA)	Chapter 6: pg. 62, para 6.4.5, para 6.4.2, DP7: Movement and accessibility	On page 65, the reference to the WLO in paragraph 6.4.5 could be made immediately after paragraph 6.4.2 , as the project will present opportunities across a number of the development principles set out in section 6.4.	Para 6.4.5 refers to the opportunity WLO offers to maximise the potential for the sites through industrial intensification and residential co-location with improved accessibility to public transport, which aligns closely with the principles set out within DP1: Maximising the potential for the sites. However, it is not the only objective of DP1; it has not been referred immediately after 6.4.2, as mentioned in the comments.	No change
	West London Alliance (WLA)	DP7: Movement and accessibility	Strongly welcome the support for safeguarding the site for the proposed Neasden station in the recommendations supporting development principle 7 .	Welcome support of DP7 and safeguarding of WLO site.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
23.	Thames Water utilities	Chapter 4:section 4.9 constraints, Chapter 6:section 6.3 Development Amount, 6.5 Environment and Sustainability principles - ESP6: Water management	Thames Water will need to retain unrestricted access to ensure that critical assets can be operated and maintained. As such this access will need to be factored into development proposals for the area. In relation to the strategic mains which cross the growth area, given the size of the mains, development may need to be located 10-15m from the assets and burst/flooding reports will be required to understand the impact of any potential bursts on new development.	Below ground utilities have been identified in Chapter 4 Today's Neasden- section 4.9 constraints . Taking account of the identified potential constraint that water infrastructure may have, further details will be added within this section regarding site-specific underground Thames Water utility constraints (including map) and impacts to development. Site-specific mitigation measures will be included in Tables for Site 1 and 2 within section 6.3 Development Amount .	Section 4: Today's Neasden: 4.9 Constraints: Map included to show Thames Water below-ground utilities. (As provided with rep). Figure 16 Constraints map and legend revised to show Thames Water below-ground utilities. 4.9 Constraints summary Add Text: <u>Significant constraint from below-ground utilities (Thames Water)</u> Section 6.3 Development Amount for Site1 and Site 2 site specific considerations and ESP6 Recommendation: Add text: <u>Development must consider groundwater utilities/assets and be located 10-15m from the assets/mains. Flooding reports will be required to understand the impact of any potential bursts on new development.</u> 6.5 Environment and Sustainability principles -ESP6: Water management recommendation: Add text: <u>Development must ensure that existing below groundwater infrastructure is protected during construction.</u>
	Thames Water utilities	Section 5.2: Masterplan growth capacity scenarios: Option 3, Fig. 23	This constraint is likely to impact on development shown in the preferred Masterplan Option 3 shown in Figure 23 of the consultation document and it is considered the proposals should be revised to take account of existing critical below ground water infrastructure. Impact of the proposals on the existing water and wastewater infrastructure to ensure the final masterplan and SPD takes due consideration of these constraints and to help ensure that any upgrades to water and sewerage networks necessary to support growth can be programmed to align with the delivery of growth. Support the requirements set out in ESP6: Water Management and in particular the requirement for all proposals to be informed by discussions with utility providers.	The draft NSGA Masterplan SPD presents high-level masterplan growth capacity scenarios and does not prescribe the design for the sites. Option 3, Figure 23 , is assumed to be on podium floors, meaning industrial yard space can be planned in areas impacted by underground utilities. However, individual schemes will be assessed once they come forward for planning and need to adhere to the principles set out in ESP6: Water management that clearly states future proposals for development within NSGA will need to consider the connection to utility infrastructure at the earliest stage of an application.	No change
	Thames Water utilities	Section 9.1 Pre-application advice	Discuss developers proposals with them ahead of the submission of any applications to ensure that any necessary upgrades to water and sewerage network infrastructure can be aligned with development. Further point should be added to the recommendations to state the following: "Development must ensure that existing below ground water infrastructure is protected during construction." Consider additional text in Section 9.1 on pre-application advice- developers should also engage with other stakeholders including Thames Water ahead of the submission of any planning applications; https://www.thameswater.co.uk/developers	All development proposals will need to be informed by discussions with utility providers and informed by ground investigation. A further point will be added in ESP6 recommendation to state: "Development must ensure that existing below ground water infrastructure is protected during construction."	6.5 Environment and sustainability principles- ESP6 Water Management recommendation: - <u>Development must ensure that existing below ground water infrastructure is protected during construction.</u>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
24.	Greater London Authority (GLA)	Draft SPD	<p>General:</p> <p>1.1 Welcomes the development of the Neasden Stations Growth Area Masterplan SPD (NSGA SPD) and the use of a plan-led approach and scenario testing to optimise housing.</p>	<p>General:</p> <p>1.1 We welcome your support in developing the draft SPD. The SPD has been informed by a plan-led approach to optimising housing delivery through co-location with industrial uses in line with the London Plan and the Local Plan objectives.</p>	No change
	Greater London Authority (GLA)	Chapter 5	<p>Good Growth:</p> <p>1.2-1.4 Aligns well with the London Plan objectives for good growth and support for vision set out within the SPD. Include a summary of the capacity study scenarios at the start of Chapter 5 with key information on headline capacity figures, the infrastructure requirements needed for each scenario, LB Brent's preferred option and justifications that support the preferred option. The limitations to the capacity methodology should be clearly set out and caveats may be required where evidence is limited. Ensure that the supporting infrastructure is identified upfront and delivered from the outset (or phased appropriately).</p>	<p>Good Growth:</p> <p>1.3 Welcome support of the vision set out within the draft SPD. The masterplan options are high-level growth capacity scenarios 'before' and 'after' the West London Orbital (WLO) link. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development.</p> <p>Chapter 5: 5.2 Masterplan capacity study scenarios: Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users, as noted later in the rep. and therefore do not present as the appropriate option for NSGA. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcomes with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic with more vulnerable uses. Albeit the Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for development outpacing its delivery. Hence our preference is for optimised co-location option 3, which optimises housing delivery alongside providing industrial capacity to conform to both the London Plan and Local Plan objectives.</p> <p>The text in sections 5.1 and 5.2 pertaining to growth capacity will be amended to say "before" and "after" WLO. Additionally, the preferred option text and summary box (pg. 53) will be revised to provide justification for our preference at this time. Our preferred option 3 forms the basis of the urban design framework (Section 6), which sets out each site's development amount and infrastructure requirements in the tables on pg. 63-65.</p> <p>1.4 Noted. The text in Chapter 5 will be amended to reflect WLO currently unfunded status and subsequently our preference for optimised co-location option 3 before the WLO. Chapter 4 Today's Neasden identifies NSGA's infrastructure needs, and Section 6.3 Development</p>	<p>5.2 Masterplan Capacity Study scenarios:</p> <p>Para 5.2.11 Preferred masterplan growth capacity option 3 summary box (pg53) will be revised to include text justification for this option and its preference at this time as follows:</p> <p>5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development. Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcome with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic with more vulnerable uses. The Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for developments outpacing its delivery. Therefore at this time, the optimised co-location option 3 before the WLO will inform the design principles and assumed quanta of development of schemes that come forward for development in short to medium term. Consequently, the urban design framework set out in Section 6 is based on Optimised co-location option 3. Should it be evident that the WLO will proceed, it is likely that the SPD will be reviewed. Prior to this review occurring, option 6 would form the basis of changed assumptions about potential development capacity on individual sites.</p>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>Amount further provide site-specific infrastructure requirements.</p> <p>Notwithstanding, the SPD offers sufficient flexibility for change of circumstances while planning for future infrastructure requirements. Additionally, an infrastructure delivery plan is being prepared to identify the requirements and delivery/ implementation of both site-specific and strategic infrastructure needs for NSGA to bring comprehensive development to the area.</p>	
	Greater London Authority (GLA)	Chapter 1-4	<p><u>Challenges and Opportunities</u></p> <p>1.5-1.6 Approach welcome on Chapters 1 to 4 of the SPD in clearly establishing the opportunities and background context for NSGA. Benefit from section setting out policy requirements and potential challenges upfront. (Funding status of WLO, safeguard waste site, design sensitivities/agents of change principle, and constraints to views).</p>	<p><u>Challenges and Opportunities</u></p> <p>1.5. We welcome support for our approach. 1.6. Noted. The policy overview chapter 3 will be amended to reflect the funding and project status of WLO. Details on safeguarded waste sites have been covered in 6.5 Environment and Sustainability principles- ESP9 Waste management that set out clear policies and principles that future development must adhere to regarding safeguarding the waste site. Design sensitivities and agents of change principles have been referenced in 6.5 Environment and Sustainability principles- ESP3: Noise and other nuisance. There are no impacts to protected views, and hence no reference is made. However, it recommends the enhancement of the viewing corridor to the west towards Wembley Stadium. A note will be added in section 4.8 Topography and views with regards to the protected view to Wembley Stadium over the bridge.</p>	<p>Chapter 3: Add text:</p> <p><u>3.1.14 West London Orbital (WLO):</u></p> <p><u>The proposals for the West London Orbital aims to link Hendon/Brent Cross/ Cricklewood/ West Hampstead in the northwest to Hounslow in the west. The route would provide orbital connection across North and West London, unlocking the potential for new jobs and homes, connecting to town centres, employment hubs and existing and future transport links to London Underground, London Overground, Elizabeth Line, National Rail and High Speed 2 interchanges.</u></p> <p><u>TfL and the WLA are assessing a full range of options that could enable sustainable growth, improve connectivity and increase public transport capacity in west London. The WLO is currently at the feasibility stage, and TfL and the WLA are working together to identify a range of funding mechanisms that could be used to secure funding for the scheme.</u></p>
	Greater London Authority (GLA)	Chapter 3	<p><u>Status of the SPD and relation to the Local Plan</u></p> <p>1.7-1.8 The Mayor of London, through the Greater London Authority, raised issues related to industrial land in his representations to the Regulation 19 draft Brent Local Plan and subsequent response to the draft Brent Local Plan's Inspectors' Matters, Issues and Questions (MIQs).</p>	<p><u>Status of the SPD and relation to the Local Plan</u></p> <p>1.7 - 1.8 comments noted. Chapter 3 policy overview para 3.1.4 within the draft SPD clearly notes the status of the SPD in relation to the Brent Local Plan. The NSGA Masterplan SPD will only be adopted after the new Brent Local Plan is adopted.</p>	No change
		Chapter 5-7	<p><u>Delivery, phasing and funding mechanisms</u></p> <p>1.9-1.13. Where a proposed development exceeds the capacity in the site allocation or is not allocated, and the borough considers the 'baseline' infrastructure capacity will be exceeded, additional infrastructure proportionate to the development is required through the development. Where development proposals are submitted prior to funding commitment for WLO, the SPD could require proposals to be</p>	<p><u>Delivery, phasing and funding mechanisms</u></p> <p>1.9-1.13. The three scenarios tested before and after the WLO are high-level growth capacity masterplan options to establish the quanta that can be achieved for each scenario. Our preference is for optimised co-location option 3, which optimises housing delivery alongside providing industrial capacity to conform to both the London Plan and Local Plan objectives.</p>	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			future proofed to allow for later intensification of sites by ensuring spatial provisions are factored in upfront which would not preclude the ability to accommodate higher densities or future transport improvements at later phases of the development. The chapter should provide clarity that any funding package for new or improved public transport connections is likely to include contributions from new residential and commercial developments that the new/improved public transport routes would serve. Such obligations and contributions may include the provision of new and improved public transport services, the expansion of cycle networks and public realm improvements, in line with the Healthy Streets Approach.	This preference aligns closely with London Plan Policy D3. At this stage, WLO is not committed to funding, and hence our preference for option 3 and subsequent chapter 6-urban design framework that includes development, sustainability and environment principles is based on option 3. The Council remains supportive of the proposed WLO, notwithstanding the delivery is not guaranteed, and the Council must plan for circumstances in which development in the area outpaces its delivery. However, the infrastructure and spatial provisions outlined in this section factor in higher densities and future growth/intensification envisaged after the WLO (option 6), if it were to come forward at a later stage, to allow future-proofing of sites within the NSGA.	
	Greater London Authority (GLA)	Chapter 2	<p><u>West London Orbital (WLO)</u></p> <p>1.14 The SPD could expand on other key benefits of the WLO in linking several Opportunity Areas, encouraging a modal shift from car and supporting more sustainable development, unlocking regeneration opportunities, and enabling more direct public transport access to local employment centres and amenities, including major employment hubs such as those in Old Oak OA, Hounslow OA and Brent Cross OA.</p>	<p><u>West London Orbital (WLO)</u></p> <p>1.14 The opportunities and key benefits from the WLO have been clearly identified in section 2.4 opportunities, and figure 3 shows the different opportunity areas. This figure has been referenced from the Mayors Transport Strategy 2018.</p>	No change
	Greater London Authority (GLA)	General	<p><u>Wembley Opportunity Area (OA)</u></p> <p>1.15- 1.17 Sites in the SPD that lie within the Wembley OA should be clearly distinguished and should reflect how the sites help to meet this indicative capacity over the plan period of Brent's draft Local Plan. If the Wembley Growth Area corresponds to the London Plan's indicative boundary of Wembley OA, this should be made clearer in the SPD and treated differently from other areas in Brent as it is of strategic importance for the whole of London.</p>	<p><u>Wembley Opportunity Area (OA)</u></p> <p>1.15-1.17 Wembley Opportunity Area boundary has been updated in the policy map to exclude the McGovern site within its boundary.</p>	No change
	Greater London Authority (GLA)	General	<p><u>Industrial Land - McGovern Yard Site</u></p> <p>1.18-1.19 As the outcome of the draft Local Plan is yet to be determined, the SPD should be clear that it cannot change policies or introduce new planning policies to Brent's development plan, and that co-location of non-industrial uses on SIL, as demonstrated in the capacity study scenarios, is not acceptable until the de-designation of SIL to LSIS is formalised through the adoption of the Local Plan. Any release of industrial land to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in London Plan Policy E7 and E5.</p>	<p><u>Industrial Land - McGovern Yard Site</u></p> <p>1.18-1.19 Comments noted. The SPD will not be adopted until the outcome of the Local Plan is determined. . In collaboration with the GLA, the draft SPD has been informed by a master planning approach to facilitate industrial intensification, co-location, and substitution in line with policy E7 and E5 of the London Plan.</p>	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Greater London Authority (GLA)	Chapter 6	Safeguarded waste site 1.20-1.22 The McGovern Yard site is safeguarded waste site in the West London Waste Plan (2015) and the proposed downgrading of SIL to LSIS could negatively affect its ability to effectively operate 24 hours, 7 days a week, through the introduction of non-industrial uses, including residential elements. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable output of the site proposed to be lost.	1.20- 1.22 Safeguarded waste site- Chapter 6.5 Environment and sustainability principle- ESP9 Waste Management clearly identifies the site as protected under London Plan policy S19 safeguarded waste site and development for non-waste uses will only be considered on land in existing waste management use if the compensatory and equal provision of waste capacity, in scale and quality, is made elsewhere within the West London Boroughs. This has also been identified on the 6.3 Development Amount for Site 1: McGovern Yard site (pg63) .	No change
	Greater London Authority (GLA)	General	Industrial land 1.23- 1.26 The outcome of the draft Local Plan is yet to be determined and the SPD's intention to introduce non-industrial uses on SIL as co-location is therefore considered premature at this stage.	1.23 - 1.26 Industrial Land: Comment noted. The draft SPD will only be adopted once the Brent Local Plan is adopted.	No change
	Greater London Authority (GLA)	Draft SPD	Tall buildings 1.27-1.28 The approach to Tall Buildings is welcomed, subject to the Mayor's response on LB Brent's Local Plan Main Modifications consultation.	1.27-1.28 Tall Buildings- We welcome your support on the NSGA being identified as tall buildings zone, as set out within the Tall building Strategy 2020.	No change
	Greater London Authority (GLA)	Chapter 5 and 6	Key masterplan and design issues- Masterplan capacity studies 1.29-1.38 The capacity studies illustrated in the SPD reveal potential design challenges related to movement, use distribution, public realm, street hierarchy and potential high levels of conflict between industrial and residential users which would result in compromised solutions for both sets of users. This could be resolved by developing a clear residential/industrial front and back strategy that informs the capacity study and by clarifying the types and location of industrial uses proposed. While it is noted that the capacity work does not represent the only possible masterplan response, further work is needed to demonstrate that a functional layout can be achieved which provides adequate separation of industrial and residential access routes, particularly for heavier industrial uses. GLA officers are of the view that horizontal co-location and intensification of retained industrial sites may enable more straightforward residential development opportunities closer to the station and may be a more appropriate approach for heavier industrial uses. <i>Public realm and street hierarchy</i> - The urban design framework could be strengthened by providing clearer guidance on the location of key public realm spaces required to support high density developments proposed in the study area. <i>Movement strategy</i> - The layout of the capacity study appears insufficiently resolved and illustrates streets that are shared by both industrial and high-density residential uses. The	The growth capacity studies for the three scenarios tested before and after the WLO are high-level masterplan capacity study options to establish the quanta that can be achieved for each of these scenarios. The Council is taking forward the optimised co-location option 3. This option conforms to both the London Plan and the Brent Local Plan and optimises/ maximises the residential development and industrial capacity. This option is viable and deliverable and maximises the outcomes for NSGA whilst responding to significant constraints and challenges on these sites. Chapter 5.2 masterplan capacity study scenarios: Options 1, 2a, 2b, 4, and 5a and 5b have significant delivery challenges and do not maximise the outcomes for NSGA to meet the London Plan and Local Plan objectives. Furthermore, the delivery of WLO is not guaranteed, and the Council must plan for development to outpace its delivery. The draft SPD does not prescribe the detailed design for the sites but sets out the wider urban design framework, including development, environment, and sustainability principles that will guide the future comprehensive development of the area. The SPD seeks to provide clarity and certainty on key requirements and outcomes while providing sufficient flexibility to allow for potential changes in circumstances. Individual schemes will be evaluated on their merit and how they bring comprehensive development to the area.	3.1 Planning Policy Overview: Other relevant planning policies and guidance: - <u>3.1.13 Reference to Good quality Homes for all Londoner's guidance.</u> 5.2 Masterplan Capacity Study scenarios: Para 5.2.11 Preferred masterplan growth capacity option 3 summary box (pg53) will be revised to include text justification for this option and its preference at this time as follows: <u>5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development. Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcome with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic</u>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Greater London Authority (GLA)	Chapter 5 and 6	<p>Industrial Intensification and Co-location Study provides further guidance on industrial typologies and design. The preferred option presented in the SPD is the “optimised co-location scenario, before WLO”, where a growth capacity of 2,338 residential units are attributed to the study area. Associated economic baseline work that underpins the scale and types of proposed industrial spaces in the capacity study should be referenced in the SPD.</p> <p><i>Use distribution</i> - The location of heavier industrial uses (B2 and B8) is not defined in the SPD. These suggest that a more strategic approach to the study area and industrial capacity in the borough should be taken. The industrial capacities tested in the SPD should relate to a wider borough level or SIL area (i.e. Wembley SIL) approach. This should be considered early in the capacity scenarios as these uses have specific requirements to enable their functioning, such as yard space provision, HGV access and large service entrances along main frontages. The legend in the masterplan options indicates that A1/A2 uses could be applied across all residential areas in the masterplan. The location of commercial and retail uses should be clarified in the drawings. Local studies that support design decisions should be referenced in the SPD. As Use Class A 1/2/3 have been revoked and replaced with Use Class E, for clarity the chapter should be updated to reflect this.</p> <p><i>Residential typologies</i> - Neasden Triangle and Neasden Works are identified as character areas that could accommodate 8-14 storey mid-rise apartment blocks. The proposed upper range is seen as substantial for mid-rise blocks. This may result in challenges to achieving adequate daylight and sunlight into homes, open spaces and streets. To help ensure closer alignment with the London Plan, officers recommend referring to the residential typologies and parameters set out in the Good Quality Homes for All Londoners guidance.</p>	<p>However, the infrastructure and spatial provisions outlined in this section factor in the higher growth capacity (after WLO option 6) and future growth/intensification envisaged with the WLO, if it were to come forward at a later stage, to allow future-proofing of sites within the NSGA. The text on our preferred option will be revised to indicate this approach and justify option three as our preferred option. As such, the growth capacity testing options are high level and not in any form a single blueprint for development.</p> <p>With development capacity and viability at NSGA contingent on several variable factors, such as the delivery of the WLO line, quantum of industrial uses and changes in policies, the quantum of commercial uses, type of residential co-location and extent of development sites, it has been necessary to undertake masterplan growth capacity studies that test a number of different scenarios but providing detailed masterplan design at this stage was not deemed the right masterplan approach. Hence the growth capacity masterplan studies consolidate these outcomes into a robust urban design framework. This seeks to provide clarity and certainty on key requirements and outcomes whilst providing flexibility for changes in future circumstances. All key stakeholders- GLA, TFL, WLA, Landowners, developers and ward councillors were engaged throughout the process.</p> <p>Individual schemes will be evaluated on their merit and how they bring comprehensive development to the area whilst responding to the constraints identified in chapter 4 and subsequent development. Sustainability and environmental principles set out in chapter 6 establish clear principles that should underpin any future developments with NSGA. Chapter 6.2 further outlines the character areas for the sites within the NSGA, with details of land use, street width, street types and connectivity, building type, height, massing, landscape etc. which is expected as part of future development in the area.</p> <p>The capacity testing options provide greater flexibility and are compliant with both the London Plan and the Brent Local Plan. Additionally, Option 1, 4, 2 (a and b), and 5 (a and b) have significant delivery challenges, especially regarding segregation of movement network and industrial traffic with more vulnerable users of the road. Our preferred option 3 is on podium floor level with industrial below podium and some commercial/residential vertically co-located; this provides segregation of industrial traffic with more vulnerable users of the road. Option 3 optimises housing and industrial capacity and conforms to the London Plan and Local Plan objectives.</p>	<p><u>with more vulnerable uses. The Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for developments outpacing its delivery. Therefore at this time, the optimised co-location option 3 before the WLO will inform the design principles and assumed quanta of development of schemes that come forward for development in short to medium term. Consequently, the urban design framework set out in Section 6 is based on Optimised co-location option 3. Should it be evident that the WLO will proceed, it is likely that the SPD will be reviewed. Prior to this review, option 6 would form the basis of changed assumptions about potential development capacity on individual sites.</u></p> <p>Figure 18, 19, 20, 21, 22, and 23 legends (pg.47-52): Reference to A1/A2 uses will be removed on all masterplan capacity options legends and replaced with Class E where commercial/retail use is indicated.</p>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				The masterplan capacity options legend will be revised to show class E uses where the commercial /retail uses are indicated. The draft NSGA Masterplan SPD seeks to support B2 and B8 industrial uses aligning with policy E4, E6 and E7 of the London Plan and policy BE2 of the new Local Plan. All future proposals will need to adhere to the guidance set out in the Tall Building Strategy and Brent Design Guide SPD1 that provide detailed guidance on daylighting, open space and streets. Reference to Good quality Homes for all Londoner's guidance will be made in Chapter 3 – Other relevant planning policies and guidance.(Para 3.1.13)	
25.	Environment Agency (EA)	ESP1 Resilient and efficient development	<u>Climate resilience and Net Zero Carbon:</u> Support for policy ESP1 . Relevant to refer to London Plan (2021) Policy GG6 Increasing efficiency and resilience.	<u>Climate resilience and Net Zero Carbon:</u> We welcome your support on ESP1 Resilient and efficient development and reference preparing for a changing climate: Good Practice in this section. Reference to London Plan (2021) Policy GG6 Increasing efficiency and resilience, as well as Policy S12 Minimising greenhouse gas emissions, will be included.	ESP1 recommendation: - <u>Refer to preparing for a changing climate: Good Practice.</u> - <u>Refer to London Plan (2021) Policy GG6 Increasing efficiency and resilience, as well as Policy S12 Minimising greenhouse gas emissions.</u>
	Environment Agency (EA)	Air Quality, Chapter 3	<u>Air Quality:</u> Support development principle ESP2: Air Quality. Section 3.1 Planning Policy Overview , we would expect to see reference made to London Plan Policy SI1 Improving Air Quality.	<u>Air Quality:</u> We welcome support on ESP2: Air Quality and section 4.6.1 . We will reference London Plan Policy SI1 Improving Air Quality in section 3.1 planning policy overview .	6.5 Environment and sustainability principles ESP2: Air Quality recommendation text: - <u>Refer to London Plan (2021), Policy GG6 Increasing efficiency and resilience, Policy S12 Minimising greenhouse gas emissions.</u> 3.1 Planning policy review: 3.1.13 other relevant policy: Reference London Plan Policy SI1 Improving Air Quality.
	Environment Agency (EA)	ESP4: Ecology, arboriculture and urban greening.	<u>A Green Place – Ecology & Green infrastructure:</u> Support for ESP4 . Recommend reference is made to the DEFRA Biodiversity Metric 3.0 (published July 2021) to help development project to calculate biodiversity net gain. Recommend that the SPD references the London Plan's Urban Greening Factor (Policy G5). SPD to be evidenced by, and reference, the Green Infrastructure Focus Map and LNRS. (Local nature recovery strategies) to help planning authorities to identify strategic investments in local habitats.	<u>A Green Place – Ecology & Green infrastructure:</u> We welcome support on ESP4: Ecology, arboriculture and urban greening . We will reference DEFRA Biodiversity Metric in this section, as noted. We will reference the green infrastructure focus map in the context of landscaping, public realm and ecology in this section.	ESP4: Ecology, arboriculture and urban greening: Recommendation text: - <u>Refer to DEFRA Biodiversity Metric and green infrastructure focus map in the context of landscaping, public realm and ecology.</u>
	Environment Agency (EA)	ESP5: Ground conditions	<u>Groundwater Protection:</u> Support ESP5: Ground conditions . Inclusion of Suds from a groundwater perspective.	<u>Groundwater Protection:</u> We welcome the support of ESP5 . The draft SPD has outlined the need for the provision of Suds' across all the sites. This is clearly indicated in section 6.2 character area under tables 13-15.	ESP9: Waste management: Recommendation text: - <u>Refer to London Plan Policy SI8 Waste capacity in this section.</u>
	Environment Agency (EA)	ESP6: Water management	<u>Water Management:</u>	<u>Water Management:</u>	ESP6: Water management: Recommendation text:

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			Support ESP6: Water management . Use of water efficiency measures and higher standards of a maximum of 110 litres per person per day is applied as the water consumption limit for all new residential development. All new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.	We welcome support for policy ESP6: Water management . We will reference water efficiency measures, and higher standards of a maximum of 110 litres per person per day are applied as the water consumption limit for all new residential development. In this section, all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.	- <u>Water efficiency measures and higher standards of a maximum of 110 litres per person per day is applied as the water consumption limit for all new residential development. All new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</u>
	Environment Agency (EA)	Section 2.3 Our Values: A Green Place, ESP7: Open space and amenity	<u>Open Space and Public Realm</u> Support ESP7: Open space and amenity . Refer London Plan Policy G5 for Urban Greening Factor in section 2- A green place .	<u>Open Space and Public Realm</u> We welcome support for ESP7: Open space and amenity . We will reference London Plan Policy G5 for Urban Greening Factor in section 2- A green place .	Section 2.3 Our Values: A Green Place: 2.3.22 London Plan Policy G5 for Urban Greening Factor further provides guidance on requirement for urban greening factor for new development.
	Environment Agency (EA)	ESP9: Waste management	<u>Waste management</u> Support ESP9: Waste management . It may be beneficial to also reference London Plan Policy SI8 Waste capacity and net waste self-sufficiency.	<u>Waste management</u> We welcome support for ESP9: Waste management . We will reference London Plan Policy SI8 Waste capacity in section ESP9: Waste management .	ESP9: Waste management. Recommendation text- - <u>Refer to London Plan Policy SI8 Waste capacity in section ESP9: Waste management.</u>
26.	Transport for London (TfL) Planning Team	2.1.1	2.1.1 Refer inclusivity for public realm in vision.	Comments noted. 2.1.1 Will be updated to include inclusivity of public realm.	Add text: <u>2.1.1 Redevelopment will be complemented by public spaces and pocket parks, enhanced and high quality inclusive public realm to cater to varied groups and users.</u>
	Transport for London (TfL) Planning Team	2.3.15	2.3.15 Supportive for 15-minute neighbourhood. Reference Healthy Streets indicators; feel safe, easy to cross and consider noise.	We welcome support on 15 min neighbourhoods and will reference Healthy Streets indicators as noted in section 2.3.15 (a connected place). Principle DP7 Movement and accessibility also references Policy London Plan policy T2 for Healthy Streets and modal shift.	No change
	Transport for London (TfL) Planning Team	2.4.10	2.4.10 Crossings need to meet pedestrian desire lines- Directness principle.	Comments noted on 2.4.10 and will be revised to reflect.	<u>2.4.10 Crossing design and locations should be planned such that they meet pedestrian desire lines.</u>
	Transport for London (TfL) Planning Team	Page 11	Page 11: The acronym 'WLA' is used on page 5 but it is only defined on page 11 ('West London Alliance').	Noted and WLA acronym text will be revised on pg. 5 .	WLA acronym text revised on pg. 5
	Transport for London (TfL) Planning Team	Section 4.4	4.4 Explain what PTAL is. Colours used on Figure 10 on page 38 are difficult to distinguish, especially in the legend.	Definition of PTAL will be included in section 4.4 movement and accessibility. TfL colleagues provided figure 10 (pg.38) PTAL diagram , and we will welcome if a clearer image can be provided; we will revise this figure likewise.	Definition of PTAL to be included in section 4.4 movement and accessibility underneath figure 10 as below: <u>Public Transport Access Level is a measure of access to the public transport network. For any given point in London, PTALs combine walk times from a chosen point to the network (stations and bus stops, for example) together with service frequency data at these locations.</u> Figure 10 to be provided by TfL colleagues and updated likewise.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Transport for London (TfL) Planning Team	Section 4.4.3	In section 4.4.3 , make clear the N98 is a night bus and therefore only operates every thirty minutes.	Section 4.4.3 will make clear N98 is a night bus operating every 30mins.	<p>4.4.3 Remove original text Neasden Lane is served every 9-13 minutes between 6am and 11pm by bus route 297 to Willesden and Ealing Broadway. Dudden Hill Lane is served by bus routes 302 to Mill Hill/Kensal Rise (operating every 6-11 minutes) and N98, which operates every 30 minutes between Stanmore and Central London.</p> <p>New text: <u>4.4.3. Neasden Lane is served every 9-13 minutes between 6am and 11pm by bus route 297 to Willesden and Ealing Broadway. Dudden Hill Lane is served by bus routes 302 to Mill Hill/Kensal Rise (operating every 6-11 minutes) and N98 is a night bus, which operates every 30 minutes between Stanmore and Central London.</u></p>
	Transport for London (TfL) Planning Team	Section 4.6.4	In section 4.6.4 , only the original northbound ('down') Metropolitan Railway platform remains largely intact (the original southbound ('up') platform was converted into the existing island).	Comment noted. Section 4.6.4 will be revised to reflect.	<p>4.6.4 Remove original text: However, Neasden station is one of only a few on the southern section of the former Metropolitan railway to still have its original platform buildings intact.</p> <p>New text: <u>4.6.4 The original northbound ('down') Metropolitan Railway platform remains largely intact (the original southbound ('up') platform was converted into an existing island.</u></p>
	Transport for London (TfL) Planning Team	General	Expected analysis on capacity and issues concerning Neasden station, such as the lack of step-free access and the constrained size of the ticket hall and staircase down to platform level. Impact of trip generated on station/train/bus capacity and improvements or enhancements needed to support the scale of proposed development. Identify potential improvements to public transport infrastructure (other than the new WLO station).	In terms of the existing station assessment, this is not part of the draft SPD. However, a separate transport assessment - 'Transport Study Project Brief' (July 2021) has been commissioned to assess the traffic impact generated by NSGA on the local highway and Strategic Road Network and determine if /what interventions and Mitigation measures may be required. Additionally, an NSGA infrastructure delivery plan is being prepared that identifies the site-specific and strategic transport infrastructure including, roads, crossing, junctions and public realm improvements, strategic and local links (including upgrades to Neasden LU Station and local bus network) enhancements, interventions implementation/delivery plan across NSGA.	No change
	Transport for London (TfL) Planning Team	Chapter 7	Ownership map needs to be revised for Site 5 to show LU owned land.	Comments on ownership noted and figure 29 will be revised likewise.	Figure 29 revised
	Transport for London (TfL) Planning Team	Chapter 5	Location of the WLO to be revised on all options as per image below.	Comments noted and all options will be revised with location of WLO as per image provided. Please note the exact location was not confirmed at the time of developing the options and were positioned on the maps only for safeguarding purpose.	Figure 18, 19, 20, 21, 22, 23 revised as per image.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Transport for London (TfL) Planning Team	Draft SPD	The language used throughout the document to reflect WLO not guaranteed.	Comments noted and draft SPD language revised where applicable throughout the document	Revise language from (“will” to “would”) to reflect WLO not guaranteed in draft SPD where applicable.
	Transport for London (TfL) Planning Team	Chapter 5	Link between delivering new housing and the delivery of the WLO to be made clear.	Section 5.2.1 notes the masterplan capacity study scenarios which respond to the existing public transport accessibility and an alternative option reflecting the increased accessibility with the WLO. Section 5.2.5, 5.2.8, and 5.2.9 additionally refer to the higher densities due to improved PTAL. Section 5.2.1 text will be revised to reflect the link between delivering new housing and the delivery of WLO.	5.2.1 Each masterplan capacity study scenario is informed by a different approach to industrial intensification and residential co-location, as summarised below. Within each scenario, options respond to existing public transport accessibility with alternative options reflecting the increased accessibility generated by the proposed West London Orbital (W L O) line. <u>Option 1, 2a and 2b and 3 are before the WLO scenario with existing PTAL. Option 4, 5a and 5b and 6 are after the WLO scenario. The provision of WLO will improve the public transport accessibility for NSGA and consequently the potential for increased housing densities.</u> The three scenarios tested are: 1.Horizontal co-location (Option 1 and Option 4); 2. Vertical co-location (Options 2a/2b and Options 5a/5b); 3. Optimised co-location; vertical with maximised residential (Option 3 and Option 6).
	Transport for London (TfL) Planning Team	Chapter 6	‘Contributions to ongoing work and delivery of potential Neasden Overground WLO station for all sites.	Contribution to the existing station has been identified in the 6.4 development amount table (pg. 63-65) for all sites, and principle DP7 identifies that any proposals must contribute to the WLO given the projected increase in public transport usage envisaged. 6.4 development tables revised to include a contribution to future WLO stations for all sites.	6.4 All development tables revised to include within site specific requirements- Transport infrastructure - <u>Contribution towards the existing Neasden station and proposed WLO station.</u>
	Transport for London (TfL) Planning Team	Chapter 5	There are various ‘tested’ scenarios in the plan. Scenarios 1 and 2 are based on ‘quanta of development before the WLO provision’. Suggest that the WLO should not appear in scenario 1 and 2 as not deliverable.	The WLO is shown on all options only for safeguarding purposes, and this will be made clear on the capacity study option maps in this section.	Figure 18, 19, 20,21,22,23 maps and legends revised to show safeguarded WLO station.
	Transport for London (TfL) Planning Team	5.2.10	5.2.10- concerned that the ‘preferred option’ for development (Optimised co-location) explicitly excludes WLO provision, particularly as Brent forms part of the WLA and should support WLO provision.	The Council remains supportive of the proposed WLO, notwithstanding the delivery is not guaranteed, and that the Council must plan for circumstances in which development in the area outpaces its delivery. Hence our preference for option 3 in section 5.2.10 . All masterplan growth capacity scenario options safeguard land and access for the WLO. Additionally, the summary box in this section 5.2.11 will be revised to add justification for our preference.	Para 5.2.11 Preferred masterplan growth capacity option 3 summary box (pg53) will be revised to included text justification for this option and its preference at this time as follows: <u>5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development.</u>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
					<u>Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcome with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic with more vulnerable uses. The Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for developments outpacing its delivery. Therefore at this time, the optimised co-location option 3 before the WLO will inform the design principles and assumed quanta of development of schemes that come forward for development in short to medium term. Consequently, the urban design framework set out in Section 6 is based on Optimised co-location option 3. Should it be evident that the WLO will proceed, it is likely that the SPD will be reviewed. Prior to this review occurring, option 6 would form the basis of changed assumptions about potential development capacity on individual sites.</u>
	Transport for London (TfL) Planning Team	Draft SPD	Delivery of the WLO in the longer term will in part be dependent on securing funding from development, and for this document to explicitly exclude it seems contradictory.	The draft SPD is supportive of the WLO coming forward. Section 6.4 Development amount and principle DP7 movement and accessibility expect future development to contribute towards the WLO. All masterplan growth capacity scenario options safeguard land and access for the WLO.	No change
	Transport for London (TfL) Planning Team	Draft SPD, Chapter 5	Make clear in option 3 and throughout the document to safeguards WLO as a bare minimum.	The WLO is shown on all options for safeguarding purposes and this will further be made clear on the capacity study option maps in section 5 .	Figure 18, 19, 20, 21, 22, 23 legend and map revised to show safeguarded WLO station
	Transport for London (TfL) Planning Team	Draft SPD	Reference to potential need for new or upgraded transport infrastructure should be proposed in the doc. which will also support WLO project.	A separate transport assessment has been commissioned, 'Transport Study Project Brief' (July 2021), which will assess the traffic impact of the NSGA on the local highway and Strategic Road Network and determine if /what interventions and mitigation measures may be required. Additionally, an NSGA infrastructure delivery plan is being prepared that identifies the site-specific and strategic transport infrastructure, including roads, crossing, junctions and public realm improvements, strategic and local links enhancements and interventions (<i>including upgrades to Neasden LU Station and local bus network</i>), and implementation/delivery plan across NSGA. This also includes the WLO project.	No change
	Transport for London (TfL) Planning Team	Chapter 5	Strong preference for scenario including the WLO scenario to deliver good growth.	See response to comments on paragraph r 5.2.10 above. .	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Transport for London (TfL) Planning Team	Chapter 4	TfL site of interest which has marked as 'existing green space', definition of what is meant by 'green space'.	Fig 12 pg40 refers to TfL site of interest as the existing green buffer to rail corridor not green space as noted.	No change
	Transport for London (TfL) Planning Team	Figure 24 and 26	Section 6- make clear on fig 24 and 26 WLO station included for safeguarding purpose.	Figure 24 revised to say safeguarded WLO station. Figure 26 will removed to avoid confusion.	Figure 24 revised to show safeguarded WLO station, figure 26 deleted to avoid confusion.
	Transport for London (TfL) Planning Team	6.4.24	6.4.24- showcase explicit policy for developer contribution to WLO	6.4.24 states given the projected increase in public transport usage due to population increase and footfall in N S G A, it is essential that development proposals contribute towards the proposed W L O line.	No change
	Transport for London (TfL) Planning Team	DP1-DP7	DP1 and DP7 - the development principles should ensure inclusivity within NSGA.DP7- Include plan showing what walking/ cycling improvements were expected in the area, particularly if the intention would be to seek contributions towards them from development. DP1- Show plan showing for local transport interventions (e.g. walking and cycling) DP7- Reference to meeting the cycle parking standards set out in the London Plan is made DP7 - we welcome the requirement for all new development to be 'car-free' or 'car-lite', confirm what it means.	The NSGA vision map figure 2 (pg22) identifies the walking/ cycling and other improvement opportunities for NSGA and shows local transport interventions in the area. Additionally, an NSGA infrastructure delivery plan is being prepared that identifies the site-specific and strategic transport infrastructure, including roads, crossing, junctions and public realm improvements, strategic and local links enhancements and interventions (<i>including upgrades to Neasden LU Station and local bus network</i>), including implementation/delivery plan across NSGA. DP1-DP7 will mention inclusivity, and explicit reference to cycle parking standards will be made on DP7 recommendations . Welcome support for car-free or car-lite development for all new development. DP7 references local plan policies for car-free development, and future developments are expected to adhere to policies and principles regarding the same.	Reference inclusivity within principles DP1-DP7 recommendation. - <u>Developments must ensure inclusivity and plan for all user groups.</u> Reference cycle parking standards within DP7 recommendation. - <u>As a minimum, developments will need to comply with Brent Local Plan parking standards, as set out in Policy BT2. Cycle standard- 1 space per studio and 1 bedroom unit; 2 spaces per all other dwellings and visitor cycle parking: 1 space per 40 units and cycle storage.</u>
	Transport for London (TfL) Planning Team	Section 7.4	7.4 - Long term maintenance should include durable materials to ensure quality and life.	Chapter 2 Neasden reimagine, 2.3 our values - A robust place makes specific reference to the use of durable materials for improving cost-effectiveness and help sustain the life and quality of the development. All future developments should be underpinned by the values of creating a robust place.	No change
27.	National Highways (formerly Highways England)	General	National Highways (formerly Highways England) has undertaken a review of the draft SPD which helps identify and maximise the development potential of the NSGA. The SPD proposes a high level of development, and it should be ensured that the transport evidence base for the NSGA, following this consultation, provides indication of what traffic impacts the development site would have on the SRN and M1 Junction 1. As the NSGA development proposal comes forward, it will need to be consistent with the Local Plan and consider traffic impact in accordance with the SOCG agreement and Transport Strategy brief, which National Highways has already reviewed.	As mentioned in the comments, an 'NSGA Transport Study Project Brief' (July 2021) has been prepared and commissioned to assess the impact of development on future transport infrastructure. We note National Highways (formerly Highways England) has previously provided acceptance of the high-level approach presented and has been engaged at all key steps in the identification/development of this transport evidence and modelling. A scoping report together with the final results of the study has been shared with National Highways. The study concludes no significant adverse impacts on the Strategic Road Network (SRN) and M1 Junction 1 that would warrant specific mitigation measures over and above those typically associated with essentially retaining existing industrial floor space and predominantly car-free development. After reviewing the study, National Highways	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				9 th March 2022 confirmed that they are content that development within the NSGA will not have significant impact on the SRN and M1 Junction 1.	
	National Highways (formerly Highways England)	Section 7.3	<p>Section 9 of the Masterplan SPD considers the planning process. National Highways (formerly Highways England) will need to be consulted at the pre-application stage, to discuss proposals for development at NSGA, and allow any issues to be identified and resolved before the submission of a formal planning application.</p> <p>Section 7.3 of the Masterplan SPD (Delivery and Monitoring), confirms that the Council will monitor and review the document to ensure that the document remains relevant and in accordance with policies over the Local Plan period through an Annual Monitoring Report (AMR). This approach is welcomed by National Highways.</p>	Section 9.1 Pre-application encourages applicants to seek early engagement with officers from Brent Development Management to discuss proposals for development at NSGA prior to the submission of a planning application at the pre-application stage. This ensures officers from key service areas such as Highways are engaged early on in the application process. We welcome your support on section 7.3 .	No change
28.	Jeffery Ruffels, Kings Street (Land interest McGovern Site)	Chapter 5	<p>Option 3- Better layout. Access and service need consideration. Pedestrian safety concerns. Pedestrian safety concern due to industrial uses. Block massing consistent. Corner need to be marked to show prominence. Can accommodate more density. Parking if under blocks will impede use parks and amenity spaces.</p> <p>Option 6- Successful option. Can deliver more density. Podium can accommodate more activities and pedestrian realm and green space. Ideal for intensification. Minimum density should be 1000 to be viable. Consideration for parking requirement. Providing new station access on McGovern site save cost for WLO. Direct visual and safe pedestrian access. Safeguard space for WLO. Existing station not able to accommodate growth. Without increased capacity transport infrastructure and other infrastructure needs cannot be met to support proposals. Option 6 is the only reliable viable option that can be made LSIS compliant.</p>	<p>The three scenarios tested before and after the WLO are high-level growth capacity masterplan options to establish the quanta that can be achieved for each scenario. The design options illustrate how redevelopment in the NSGA can viably deliver sustainable growth, meet planning policy requirements, an appropriate mix of land uses (including meeting housing and industrial targets), and necessary supporting infrastructure to transform the existing poor quality environment and bring forward physical, social and economic regeneration for all the community.</p> <p>Our preferred growth capacity masterplan optimised co-location Option 3 is on podium floor level with industrial below and some commercial and residential stacked on vertical floors. This is deemed appropriate as it segregates industrial traffic from more vulnerable road users. These growth capacity options are set out as a framework for development and do not prescribe the detailed design for the sites. Individual schemes will be evaluated on their own merits and how they contribute to the comprehensive development of the area.</p> <p>Both Option 3 and 6 present the best outcomes for NSGA. At this stage, the Council remains supportive of the proposed WLO, notwithstanding the delivery is not guaranteed, and the Council must plan for circumstances in which development in the area outpaces its delivery. Hence our preferred option 3. However, the draft SPD offers flexibility in changes in future circumstances. The draft SPD recognises the opportunity offered by the WLO, and all the options safeguard the WLO Station. 6.4 Development Amount expect developer contribution to the existing station enhancements and Principle DP7 movement and accessibility recognise the contribution to future provision for the WLO. Figure 2 Vision map identifies the transport infrastructure delivery, and Chapter</p>	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>4 Today's NSGA identifies the future infrastructure requirements for the area. Additionally, an Infrastructure Delivery Plan is being prepared for NSGA that further identifies strategic and site-specific infrastructure needs and measures for the comprehensive development of the area.</p> <p>The draft SPD promotes a car-free or car-lite development. Proposals will need to adhere to policy guidance set out in section 6- DP7 Movement and accessibility. As a minimum, developments will need to comply with Brent Local Plan parking standards, as set out in Policy BT2. The draft SPD complies with the Local Plan policies, and any proposal coming forward will need to adhere to the policies and urban design framework set out in the document.</p>	
	Jeffrey Ruffle, Kings Street (Land interest McGovern Site)	NSGA Viability assessment (BNPP)	The Financial Viability Assessment prepared by BNP Paribas benchmarks the McGovern's land value (with 20% premium) at £6,405,450. The site area is approximately 4.5 acres. This valuation appears to be based on the (indexed) rateable value of the site with a 6% yield multiplier. However, the commercial of industrial land in the area is in the region of £8-10 per acre. Therefore, the basis of the viability must be questioned. Site is worth more as industrial land than it is for development. Both Option 3 and Option 6 assume significant less density that is required to make the development of this viable. Without the development of this site, it is unlikely that the delivery of the whole masterplan is realistically possible.	The BNPP viability assessment benchmarks redevelopment of the draft SPD sites against their existing use value, based on the capital value of existing properties, together with a 20% premium to incentivise release of the sites for development. Such an approach is considered to be in line with national, regional and local planning policy and guidance, and the BNPP assessment is that Masterplan options are viable for the bulk of the sites.	No change
29.	Pinnacle investment	Draft SPD	Support overriding vision for growth and principles set out within the SPD. The SPD should clarify that the delivery of high-density development within this identified Growth Area is not linked or dependent on the delivery of this infrastructure project. (Such as the WLO) as it already benefits from excellent transport links. Support the need for infrastructure identified in the SPD and interested in engaging with residents to establish infrastructure priorities. Supportive of the principles set out within the SPD.	We welcome your support on the principles and vision set out in the draft SPD. Our preferred option is optimised co-location option 3 before the WLO. Whilst we are fully supportive of the WLO coming forward, the draft SPD has taken into account the fact that development may outpace delivery of the WLO. We are supportive of the approach to engage with the residents to assess community needs and infrastructure to inform design/planning for the site.	No change
	Pinnacle investment	6.3 Development Amount	The SPD should clarify and explain that the indicative figures stated for each site are not intended to guide or limit the development amount and opportunity. The guidance should not be overly prescriptive and refer to "two 0.2ha pocket parks". This requirement has not been informed by a detailed feasibility study and there are other relevant planning policies regarding the appropriate quantum of open space and communal space.	The masterplan growth capacity options test the quanta of development for different scenarios and conclude optimised co-location option 3 as our preferred option. As the delivery of the WLO is not guaranteed, and the Council must plan for development outpacing its delivery. The draft SPD offers flexibility in changes to future circumstances. Consequently, 6.3 Development Amount tables show indicative figures. The outcomes of the growth capacity masterplan options are consolidated into a robust urban design network in Chapter 6, and chapter 6.2 Character Area, 6.3 Development amount, 6.4 Development principles, and 6.5 Environmental and sustainability principles provide clarity and certainty on requirements and principles that will guide comprehensive development	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				of the area. This approach is deemed appropriate as the Council needs to plan and meet future infrastructure needs. Whilst sufficient flexibility is offered within the SPD, development proposals are expected to adhere to the principles and guidance set out within the document.	
	Pinnacle investment	6.3 Development Amount	Reference to a district heating network being delivered specifically on this site should be removed, and informed by a feasibility study to determine an energy solution. Remove reference to the exact size of community function and flexibility built to determine type and size through engagement with residents and approach agreed during the pre-application stage.	In terms of the provisions for a district heating network, the Council is proactive and prioritises sustainability and its vision for 'carbon zero' developments moving forward, especially with the declaration of a Climate Emergency. The Council has previously sought engagement with relevant bodies and deems Site 3 (CNWL site) ideal for the location of a district heating network. Furthermore, a feasibility study will be undertaken by the Council in the forthcoming months to provide further direction. We also support feasibility studies being carried out as part of any detailed scheme coming forward on this site.	No change
	Pinnacle investment	6.3 Development Amount	Remove reference to the need to deliver health infrastructure removed unless there is a clear known need.	The Council has worked closely with the NHS and the Healthy Urban Development Unit (HUDU) and has identified future provisions needed to meet health infrastructure generated by the new developments, which should be accommodated on site. We support further engagement with residents and relevant stakeholders to access this need.	No change
	Pinnacle investment	9.6 CIL/S106 planning obligation	The SPD should directly refer to Regulations 73 of the CIL regulations to confirm the acceptability of delivering infrastructure 'in kind' of CIL contributions such as contribution towards the existing station. Site 3 is closer to Dollis Hill station. Further detail and assurances are required regarding any requested contributions. Expect it to be part of the CIL contribution. Significant infrastructure improvements would likely fall outside of any planning application for the CNWL site, need to be better developed before referencing within the SPD.	In terms of CIL and specific infrastructure requirements identified in the SPD, such as green space, the SPD seeks to provide clarity and certainty on key requirements and outcomes in section 6.3 Development amount and takes into account the existing and future demands in the area. This approach is deemed appropriate and in line with the SPD's and Local Plan objectives. Additionally, Section 9.6 CIL/S106 Planning Obligation provides a reference to the Council website: https://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/community-infrastructure-levy-cil/ , where further details regarding regulation 73 (contributions in-kind) can be found. The acceptability of CIL as such will be determined when detailed schemes come forward for planning. Any existing outdoor sports facilities must be retained or re-provided and consistent with the Local Plan policies.	No change
	Pinnacle investment	6.3 Development Amount, DP5, DP6	Reference to the retention of sports facilities removed as it is associated with existing College uses relocated. The correct type and location of play and sports facilities should be informed through the design process and relevant planning policies.	Any existing outdoor sports facilities are required to be retained or re-provided and is consistent with the Local Plan policies.	No change
	Pinnacle investment	6.2 Character Area	SPD should clarify that the Character Area guidance is not intended to be prescriptive or limiting. The approach to massing, layout and height should be informed through detailed engagement with key stakeholders.	We welcome your support on the character areas and principles set out in the draft SPD. 6.2 Character Area section provides further guidance of this area's acceptable future characteristics, including land use, street width, street type and connectivity, building type, height and massing, and Landscape and open space type.	Height's Plan included section 5.2 Growth capacity study scenario with preferred option 3.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				Additionally, a heights plan will be included within section 5.2 Growth Capacity Study Scenario- Preferred optimised co-location option 3 to provide guidance on the appropriate location of the taller buildings within NSGA. The SPD seeks to provide clarity and guidance on the acceptable design principles within the Character Area section, which developments should seek to adhere to. Notwithstanding, it is not the only way or a single blueprint of how developments within NSGA can come forward. Individual schemes will be evaluated on their merit and how they bring comprehensive development to the area whilst taking account of the SPD's principles and guidance and other planning objectives when they come forward for planning.	
30.	Maragan Investments limited	Draft SPD	Support for the vision and principles set out in the draft SPD.	We welcome support on the vision and principles set out within the draft SPD.	No change
	Maragan Investments limited	Section 6.2 Character Area	Limiting the heights of development on the Dephna House site does not allow for the site to be fully optimised (as required by national and local planning policies) whilst also fitting seamlessly into the future context of the Growth Area. Changes sought for Dephna House Character area to accommodate 20 storeys and providing an element of commercial floor space on the ground floor as opposed to industrial.	Proximity to 2 storey residential properties and low-rise developments means that in advance of detailed analysis that would typically be required in association with a planning application, the Council is only confident of supporting the heights identified in SPD. The Depot Mews Character Area is for building heights up to 4 storeys to the west, rising to 7 storeys to the east, to respect the surrounding townscape. It might be that greater height for Dephna House can be shown to be appropriate through the application process.	Section 6.2 Character Area: Depot Mews Character Area table 17 and text 6.2.20 Future Character –Added text <u>Note: Consideration for appropriate heights will be made subject to detailed design and impact assessment when sites come forward for planning.</u>
	Maragan Investments limited	Chapter 5	Provide an element of commercial floor space on the ground floor as opposed to industrial for Dephna House site.	Whilst light industrial uses are desirable for the majority of this character area, for the Dephna House site, due to its optimum location and access to wider movement network, provision for some commercial uses are acceptable at ground floor level.	Section 6.2 Character Area: Depot Mews Character Area table 17: <u>Acceptable research and development, light industrial Class E type of alongside commercial uses.</u>
31.	DP9- O'Hara site	Chapter 5.2 Growth Capacity Study scenario	Deletion of "Maximums" For the SPD to be effective, it needs to be flexible. The document artificially and unnecessarily refers to maximum development capacities.	The draft SPD conforms to the Local Plan and London Plan objectives and follows a plan-led approach. The masterplan approach tests the growth capacity study scenario options before and after the WLO and seeks to establish the quanta of development appropriate for the sites in each case. The SPD consolidates the outcomes of the masterplan capacity studies into a robust urban design framework and seeks to provide clarity and certainty on key requirements and outcomes in section 6.3 Development amount. Individual schemes will be evaluated on their merits and how they contribute to the comprehensive development of the area. As such, the Council has concluded that a Masterplan SPD demonstrating the range of dimensions within which regeneration can appropriately come forward is the most suitable way of guiding future development across the growth area. Option 3 (before WLO) is our preferred option. The subsequent capacity tables 8 and 9, and 6.3 development amounts are based on this optimised co-location option 3.	Chapter 5.2 Growth Capacity Study Scenario: Reference to maximum removed on all growth capacity study scenario options (Before and after the WLO).

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				Though the Council remains fully supportive of the proposed WLO, its delivery is not guaranteed, and the Council must plan for circumstances in which development in the area outpaces its delivery. We acknowledge the provision for the WLO will further help unlock the potential for land in the area and consequently higher densities. Consequently, our preferred option is option 3. However, the draft SPD offers sufficient flexibility to the change in circumstances. The reference to maximum quantum of development will be revised in section 5.2, growth capacity study scenarios. Future developments are expected to adhere to the principles and urban design framework set out in the document for the comprehensive development of the area.	
	DP9- O'Hara site	Section 6.2 Character Area: Neasden Triangle	Neasden Triangle Replace "22" to "Over 20 storeys" for Neasden Triangle. Neasden Triangle has the ability to accommodate a number of tall buildings, the tallest of which could be around 30 storeys.	<p>The Neasden Triangle character area table 13 clearly sets out the acceptable future characteristics for the O'Hara Site. This has been informed by best practice urban design analysis and principles, review of all relevant policies both within the Brent Local Plan and London Plan policies, the Tall Building Strategy, Brent Design Guide SPD1, alongside the values set within chapter 2 Neasden Reimagined, that underpin the growth capacity masterplan option 3. Additionally, a heights plan will be included for further clarity on where this can be accommodated. Please note that the draft SPD section 5.2 clarifies that the growth capacity study scenario options are high level and not in any form a single blueprint or the only way for development to come forward within NSGA.</p> <p>While the draft NSGA Masterplan SPD does not prescribe the location of the tallest building on the site, the design proposals are expected to look at the wider townscape to consider its appropriateness and step down/up likewise. Please note individual sites will be evaluated on their merit and how they bring comprehensive development of the area when they come forward for planning.</p>	Height's Plan included section 5.2 Growth capacity study scenario with preferred option 3.
	DP9- O'Hara site	Draft SPD	Remove reference to "heavy/logistics"	<p>The draft SPD seeks to meet the London Plan and Brent Local Plan policy objectives. Policy E4, E6 and E7 of the London Plan sets out the policies for industrial land. The Brent Local Plan Policy BE2 takes this strategic designation forward and affirms its development potential to support intensification and co-location. Policy BE2 requires industrial floor space resulting in a minimum 0.65 plot ratio or the existing floor space total, whichever is greater, across the growth area. Chapter 6.4 Development principles: DP3 Local employment and affordability provide further clarity on the expected industrial floor space.</p> <p>The O'Hara site is a locally significant industrial land (LSIS). Development proposals are expected to meet the</p>	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				policy set out in the Brent Local Plan and London Plan, which LSIS for industrial use and provide employment opportunities for the local community. Please note individual sites will be evaluated on their merits when they come forward for planning.	
	DP9- O'Hara site	Chapter 5	Increase Site 2 "New Housing Target. Approximately 650 homes.	The draft SPD tests the growth capacity study scenario options before and after the WLO and seeks to establish the quanta of development appropriate for the sites. It consolidates the outcomes into a robust urban design framework and seeks to provide clarity and certainty on key requirements whilst providing sufficient flexibility to change circumstances in the future. Individual schemes will be evaluated on their own merit and how they bring comprehensive development of the area while adhering to the draft SPD principles and urban design framework.	No change
	DP9- O'Hara site	Chapter 5	Amend Site 2 "Industrial & Commercial – "Approximately 1,100m2"	Our preferred capacity option 3 is on podium floor level with industrial below podium and some commercial and residential stacked on vertical floors. This will ensure the segregation of industrial uses and traffic from other more vulnerable uses. We would thereby deem industrial uses appropriate for the site. Section 6.4 Development Principles- DP3 Local employment and affordability further provide guidance on the kind of industrial spaces which can be accommodated within future developments. Industrial capacities are minimum targets based on indicative capacities. Please note individual proposals will be assessed on their merits and how they bring comprehensive development of the area when they come forward for planning. In terms of the commercial uses, this is indicative, and future proposals must engage with local residents and stakeholders to determine the appropriate kind of uses. Future proposals must adhere to policy DP2: Local Neighbourhood parade and must not unacceptably impact the vitality and viability of the nearby Neasden and Church End town centres in terms of proposed uses and over provisions.	No change
	DP9- O'Hara site	Chapter 6- DP4	Amend Housing mix to be "25% family-seized dwellings subject to individual site constraints".	Proposals will need to adhere to policies within the Brent Local Plan in terms of providing housing mix.	No change
32.	Neasden Good's Yard (Glynn's Skip)	Chapter 6.5	The proposed allocation of the two Neasden waste facilities in the draft SPD for redevelopment to deliver new housing and industrial and commercial floor space, alongside supporting infrastructure (McGovern Yard Site) will have a considerable impact on our operations. It is therefore imperative (as noted in the SPD) that any future development proposals for the McGovern Yard Site appropriately accommodate the existing waste capacity on-site, or alternatively identify suitable sites with appropriate waste capacity.	Comments noted. Section 6.5 Environment and sustainability principles: ESP9: Waste management within the draft SPD clearly states the two Neasden waste sites are protected under London Plan Policy S I9 Safeguarded Waste sites and the West London Waste Plan Policy WLWP2 – Safeguarding and Protection of Existing and Allocated Waste Sites. To ensure no loss in existing capacity, the redevelopment of any existing waste management sites must ensure that the quantity of waste to be managed is equal to or greater	

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				than the quantity of waste for which the site is currently permitted to manage or that the management of the waste is being moved up the waste hierarchy. Development for non-waste uses will only be considered on land in existing waste management use if the compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs. Application of Agent of Change principle has been referenced in ESP2 Noise and other nuisances within the document. (pg70).	No change
33.	United College Group (College of North West London)	General	UCG has agreed Heads of Terms with Pinnacle Investments who are selected as our preferred developer partner to acquire the Willesden campus with a view to regenerating the site and providing a significant number of market and affordable homes. UCG wish to support their detailed representations on the emerging masterplan in this respect.	Noted.	No change
34.	Transport for London Commercial Development (TfL CD) (Dephna House and Depot Mews)	Draft SPD	Requirement for industrial uses on this site is not supported, which is as per TfL CD's representations submitted to the Local Plan consultations. If uses other than residential are considered necessary then commercial uses would be a more complementary. The site has no current industrial designations.	The provision for industrial uses is desirable on the Dephna House (Depot Mews) site. This reflects in part the existing quasi-industrial use associated with its support of the LUL network at Neasden depot. In addition, it takes into account the overall need for additional industrial floor space in the borough as identified in the Local Plan. Representations received on the draft SPD indicate that the existing LSIS sites may struggle to be policy compliant in terms of the re-provision of required levels of industrial floor space. Consequently, we are seeking some light industrial, research and development and Class E type of alongside commercial uses on site 5.	No change
	Transport for London Commercial Development (TfL CD) (Dephna House and Depot Mews)	Section 6.2 Character Area: Depot Mews, Chapter 7: Delivery-Figure 29	In the BNP Paribas Real Estate Financial Viability Assessment October 2020 the options tested for the Dephna House and Depot Mews site do not appear viable, albeit the options tested combine the London Underground Limited site and the Dephna House site which are owned by two different landowners, and the existing use value of the Dephna House itself is dominating the viability assessment output for both sites.	Using the site for some industrial purposes such as small scale Class Eg. (ii and iii) research and development and light industrial premises on the ground floor gives greater assurance across the masterplan area that provision of industrial floor space will be maximised. It is evident that access to the wider remaining depot uses to the east will still be sought, including HGV traffic. This, together with the lower level of the site compared to existing residential areas to the north, as identified in the SPD, points to a design solution that more clearly distinguishes and provides a clear separation between a non-residential and residential environment. Figure 29: NSGA land ownership and phasing will be revised to show the multiple ownership on the Dephna and Depot Mews sites.	Section 6.2 Character Area: Depot Mews- Table 17 character area: <u>Acceptable research and development, light industrial Class E type of alongside commercial uses.</u> Section 7. Delivery- Figure 29: Amend to show TfL (CD) ownership on Site 5 and revise legend to show private ownership.
	Transport for London Commercial Development (TfL CD) (Dephna House and Depot Mews)	Section 6.2: Depot Mews:6.2.20	Request that the LUL part of the site is not required to provide industrial uses and there should not be an inflexible requirement for a podium level. If a podium element is required as mentioned in 6.2.20 of the draft SPD (which it is assumed would help facilitate the separation of industrial and residential uses so they could coexist) then there will need to	The podium floor for the Depot Mews Character Area is a design solution to separate ground floor industrial uses from residential uppers and could help attain Local Plan private amenity space standards being met on site. It is a recommendation, not a requirement.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			be a significant increase in the amount of residential to pay for this.		
35.	NEMA Ltd (McGovern Site)	Draft SPD	Support preparation of the draft document.	Welcome support of the development of draft SPD.	No change
	NEMA Ltd (McGovern Site)	Draft SPD	Constraints and capacity issues with existing station and new WLO station requirement on Site 1. It should acknowledge the burden to Site 1 in facilitating both Neasden Station and the WLO's delivery. It should ensure the land uses, design and quantum of development set out in the Urban Design Framework accord with these aspirations and provide flexibility to enable this.	Whilst we understand the constraints to the existing station and the future requirement for the WLO Station, the Council must plan for development outpacing WLO's delivery as it is not guaranteed. Section 6.3 development amount seeks contribution for the enhancement of the existing station and other infrastructure requirements. A separate Transport Study has been prepared to assess the impact of NSGA development on future transport infrastructure. The draft SPD demonstrates the range of dimensions within which regeneration can appropriately come forward in the most suitable way. It consolidates the outcomes of the masterplan capacity studies into a robust urban design framework including development, sustainability and environmental principles that are underpinned by best practice urban design analysis and the vision and values set out in chapter 2 and Section 6.3 Development Amount provides clarity and certainty on key requirements and outcomes whilst proving flexibility to future change in circumstances.	No change
	NEMA Ltd (McGovern Site)	Draft SPD	In terms of land uses, we highlight the importance of delivering the right mix of land uses for Site 1. The existing site is heavily constrained and not a realistic prospect for redevelopment which incorporates heavy industrial uses and impact on local and wider road safety. The approach to lead with no net loss of industrial floor space does not reflect the realities of the delivery of a mixed-use sustainable development which would also be burdened to provide the catalyst for the wider area to come forward (i.e. new Neasden station entrance and WLO station). The delivery of the correct balance of uses must be considered. Light industrial can include quasi retail and maker type uses that could contribute towards placemaking and meet Brent's objectives for job creation with flexible commercial uses on Site 1.	The draft SPD conforms to both London Plan and Brent Local Plan objectives that support the intensification of industrial uses within Locally Significant Industrial Sites (LSIS) and co-location of residential uses to make better use of land and to strengthen their role in supporting growth in London's economy and population. The Brent Industrial Land Audit (2019) and policy BE2 in the Brent Local Plan support such an approach. Site 1 has the potential to support both commercial and industrial uses alongside co-locating with other non-industrial uses.	No change
	NEMA Ltd (McGovern Site)	Draft SPD	Concerns due to the separate land ownerships and development timeline, district heating network may make site beholden on its delivery, recommend a passive provision approach in order to not limit sustainable development from being delivered. Advising only in regard to Site 1, these include an extensive network of Thames Water assets in the form of water mains and sewers, significant level changes to deal with, areas at high risk of surface water flooding and the need to achieve a robust fire-fighting strategy for the development. The draft SPD needs to provide appropriate flexibility to ensure that the circumstances of individual sites can be taken into account, and to ensure that development is viable, particularly those with upfront exceptional costs such	The Council is proactive, prioritises sustainability, and has a 'carbon zero' vision, especially with the declaration of Climate Emergency. The Council will undertake a feasibility study for the district heating network in the forthcoming months. We acknowledge that developments within NSGA will come forward at varying timescales. Development proposals are not contingent on their delivery and will need to have an S106 agreement and infrastructure put in place to accommodate sustainable energy requirements. Chapter 4 Today's Neasden Stations Growth Area and section 4.9 constraints identify the site constraints on NSGA. Whilst we understand the significant site constraints to Site 1, the growth capacity masterplan	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			as the delivery of a new station and the related donation of the land. We recommend specific reference to floor space quantum and the inclusion of site-specific indicative housing capacity figures are not included as part of the adopted SPD.	options are high level and do not prescribe the design for the sites, offering flexibility in terms of mitigating site constraints through design whilst adhering to the urban design principles set within Chapter 6 that further guide the comprehensive development of the area.	
	NEMA Ltd (McGovern Site)	Chapter 5	The Neasden NEMA Limited are concerned that if indicative capacities are set within the SPD that development proposals would be unduly restricted and limit the ability to deliver public benefits. We would support an approach where under the designation of being an area suitable for tall buildings, the onus is on the design and placemaking to demonstrate the suitability for the height of development where such a range is exceeded, having in mind the functional, environmental, visual and cumulative impact in line with London Plan policy D9. We would value further input into how building heights will be presented as part of the adopted SPD and would support an approach that looks at key principles and sets heights in broader terms rather than setting specific height ranges for Site 1. Otherwise there is a risk key considerations such as infrastructure delivery and the background evolving rather than existing viability context would not be factored in.	<p>The masterplan growth capacity options test the quanta of development for different scenarios and conclude optimised co-location option 3 as our preferred option. As the delivery of the WLO is not guaranteed, and the Council must plan for development outpacing its delivery. The draft SPD offers flexibility in changes to future circumstances. Consequently, 6.3 Development Amount tables show indicative figures. The outcomes of the growth capacity masterplan options are consolidated into a robust urban design framework. Industrial capacities are minimum targets based on indicative capacities. Chapter 6- Urban Design Framework, and chapter 6.2 Character Area, 6.3 Development amount, 6.4 Development principles, and 6.5 Environmental and sustainability principles provide clarity and certainty on requirements and principles that will guide comprehensive development of the area. This approach is deemed appropriate as the Council needs to plan and meet future infrastructure needs. Whilst sufficient flexibility is offered within the SPD, development proposals are expected to adhere to the principles and guidance set out within the document.</p> <p>The draft SPD has been informed by robust baseline analysis and best practice urban design principles. Additionally, a heights plan will be included to provide further guidance on the appropriate location for Tall building elements within section 5.2 growth capacity study scenarios preferred option 3. Notwithstanding, this is not the only way or a single blueprint for developments to come forward. There are no impacts to protected views in the growth area. A viewing corridor to Wembley Stadium has been shown as desirable in section 4.8 Topography and Views to maximise visual aspect to Wembley Stadium with Taller building elements. Please note individual schemes will be evaluated on their merit to bring comprehensive development to the area when they come forward for planning.</p> <p>The Council is satisfied the viability of the NSGA Masterplan SPD has been robustly tested in line with national, regional and local policy, and BNPP assessment is that Masterplan options are viable for the bulk of the sites. A separate infrastructure delivery plan is being prepared that identifies the delivery and implementation of infrastructure across the NSGA. This includes transport, community and green infrastructure for the next five-plus years.</p>	Section 5.2 masterplan capacity scenario, preferred optimised co-location option 3. (pg.53): Include Heights plan.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	NEMA Ltd (McGovern Site)	BNPP Viability Assessment	<p>Advice from DS2, a viability consultancy to provide a 'Viability Response' to the Financial Viability Assessment (FVA) prepared by BNP Paribas Real Estate to support the draft NSGA Masterplan SPD indicates insufficient account has been taken of constraints, which together with other assumptions in FVA provides an optimism bias to achieving on-site viability which cannot be supported by the masterplan options development outcomes.</p> <p>DS2 summary: This viability testing exercise demonstrates that the scale of development at the Site currently envisaged within the draft SPD is insufficient to viably deliver a level of affordable housing in keeping with the wider aspirations for the NSGA. Through sensitivity and scenario testing we conclude that the scale of residential development would need to be increased significantly in order to deliver a greater level of public benefit, of at least 1,000 homes, potentially greater subject to the level of affordable housing provided. These conclusions are based on future growth/ inflation in values and costs. On a current day basis, the Site is considerably unviable.</p>	The Council is satisfied the viability of the NSGA Masterplan SPD has been robustly tested in line with national, regional and local policy, and BNPP assessment is that Masterplan options are viable for the bulk of the sites. A separate response from BNPP regarding DS2 comment on the BNPP Financial Viability Assessment can be found at the end of this report.	No change
36.	Deloitte LLP- Universities Superannuation Scheme asset owner- Falcon industrial estate	Draft SPD, Chapter 5,6 and 7	The draft SPD is being prepared in response to policy BEGA1 of the new Local Plan which states that the Growth Area is subject to a masterplan process. We would normally expect this process to follow adoption of the Local Plan in order to ensure that it properly addresses the adopted policy requirements. USS is concerned that this is premature and as the draft SPD hinges on the site allocation, it could prejudice the direction of the SPD if the emerging Local Plan is found unsound by the Planning Inspector during the current examination or if there are changes to the draft allocation policy BEGA1. USS will support a masterplan that allows flexibility depending on market conditions and demand. The proposed masterplan and draft SPD should be appropriately flexible to allow further detail to come forward at a later stage. It should set the principle for re-development and the potential number of units it could accommodate should development take place, however it should also explicitly state that this is an indicative figure subject to further feasibility work. Requests clarification is added to the requirements section to state that the requirements are aspirational and will be subject to further detailed design and delivery plan should the Site come forward for redevelopment in the future.	The draft SPD is consistent with the Brent Local Plan and the London Plan objectives. There is no limitation for a draft SPD only to be consulted upon after adopting a Local Plan. It is relatively common practice as it provides greater clarity on the deliverability of sites and understanding policy requirements. London Plan policy E7 intensification, consolidation and co-location of LSIS requires a coordinated master planning process rather than ad-hoc planning applications. As such, it is in the interest of landowners and developers for the SPD to be brought forward in a timely manner. It is considered that the development sites will essentially be for the site owners or developers to bring forward and that this will also be reliant upon issues such as lease lengths and viability of development vs retaining uses as they are and economic cycles. The draft SPD follows a plan-led approach and conforms to both London Plan and Brent Local Plan objectives. The draft SPD concludes the masterplan capacity optimised co-location option 3 as our preferred option and consolidates this in a robust urban design framework and provides sufficient clarity and certainty on requirements, alongside the flexibility to accommodate future changes in circumstances within NSGA. Please note individual schemes will be evaluated on their own merit and how they bring the comprehensive development of the area when they come forward for planning. Future proposals are expected to adhere to the principles and urban design framework set within the draft SPD doc.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Deloitte LLP- Universities Superannuation Scheme asset owner- Falcon industrial estate		Support vision for industrial space and tall buildings but note added that existing industrial uses will be retained in the medium term given their current good condition and functionality.	We welcome support for the vision for industrial space and tall buildings. Section 7, figure 29 landownership and phasing clearly identifies Falcon industrial site as a long term aspiration and recommends retaining the existing industrial facilities. Section 4 Today's Neasden recognises the current good condition and functionality of the site.	No change
	Deloitte LLP- Universities Superannuation Scheme asset owner- Falcon industrial estate	Section 6, DP3,DP7,	Council needs to explicitly states that only a comprehensive redevelopment would be required to meet these standards set in section 6 development principles (DP3, DP7). If USS for example requires the change of use of a number of units, they should not be subject to these requirements.	The Council will continue to seek to engage and work with landowners who are a key part in ensuring that delivery outcomes can be achieved. It is recognised that Falcon Park provides relatively modern premises that are fit for purpose in meeting current occupier's needs. The policy indicates that housing delivery will occur over time; thus, it is understood that, in all likelihood, premises and sites will be used for other purposes before then. The Council is providing a positive framework for the area taking into account all policy, development, place making, transport and sustainable parameters.	No change
	Deloitte LLP- Universities Superannuation Scheme asset owner- Falcon industrial estate	Section 7.5	USS does not consider it necessary to include Section 7.5 in the SPD for this part of the Growth Area and recommends this is replaced with a commitment to work collaboratively with landowners.	The Council's intervention via CPO will only occur where absolutely necessary, and all other mechanisms of the potential agreement have otherwise been exhausted. It is considered that the current policy framework provides a sufficiently flexible approach to the future site development either for mixed-use industrial or residential purposes in the longer term and continued flexible use for industrial occupation in short to medium term.	No change

4.2 Summary of other changes to the Draft NSGA MASTERPLAN SPD

DRAFT SPD CHAPTER/SECTION/PARA	CHANGES AND REVISIONS
Front cover	Revised Masterplan SPD date to April 2022
Pg.2	Reference to growth area changed to capital letter G and A
Pg.2 reference to emerging Brent Local Plan	Reference to Brent Local Plan changed emerging to Brent's Local Plan
Pg.3 Contents	Revised to remove reference to draft
Pg.4 Masterplan SPD consultation	Revised to include consultation process and methodology up until now (as the process is now complete). Language changed to past tense and information added regarding consultation summary report. Dates for the consultation period added to included 6 weeks from 21 June 2021 to 2 August 2021. With additional week extension based on feedback from residents and stakeholders. Remove reference to being
Pg.5 Stakeholder Engagement	Revised to reflect the completion of the consultation process. Also, includes additional information regarding where to find the consultation report and final SPD doc.
Pg.6 Executive summary	Executive summary text amended to include: Original text: We are in the midst of a climate and ecological emergency, and a global pandemic. New text: <u>We face a climate and ecological emergency, and the challenge to achieve carbon neutrality by 2030.</u> New text: <u>The aim is to maximise the best use of land, provide homes and employment opportunities through industrial intensification and residential co-location supporting the Mayor's and Council's vision, and facilitate 'good growth' for Brent.</u>
Pg.7	Label added to image (page divider) <u>NSGA sites-</u>
Pg.9	Map and key amended to add Wembley Growth Area
Pg.10	1.1 background, para 1.1.3 and Para 1.3.2 amended to add abbreviation for GLA, WLA, TfL, and summary formatted
Pg.11	Label added to image (page divider)- <u>View towards Wembley Stadium from the bridge on Neasden Lane adjacent NSGA</u>
2.1.1	Abbreviation added for NSGA and WLO
2.2.1	<u>Original Text:</u> Promote active and sustainable travel modes and encourage the development of new infrastructure and the extension or enhancement of existing infrastructure; <u>New Text change on Masterplan SPD aims:</u> <u>Promote active and sustainable travel modes and encourage the links to proposed infrastructure and the extension or enhancement of existing infrastructure;</u>
Pg.14	Reference to growth area changed to capital letter G and A
Pg.21	Vision map legend update for Potential to connect to wider regeneration area Growth Areas. Vision map legend update for Maximise long distant distance views of Wembley Stadium. Incorrect street name Prout Grove corrected to Normanby Road and label Figure 2 amended to say Opportunities for comprehensive regeneration of the area
Pg.22	2.4.4 Abbreviation for NSGA uses; growth area amended with capital letter Growth Area,
Pg.22	2.4.7. <u>Delivery of the WLO line alongside the existing Neasden Station will improve public transport accessibility at Neasden that will underpin this new sense of place by supporting the definition of a neighbourhood centre along Neasden Lane, between the existing and planned stations, and creating a focal point for the community.</u>
Pg.23	Map updated to correct location of NSGA Site Allocation, and correct text West Hamstead Hampstead
Pg.24	Map updated to make it clearer and label updated to read- <u>Figure 4: Illustrative movement sketch of the strategic location of Neasden Stations Growth Area</u>
Pg.25	Label added to image (page divider)- <u>Existing Neasden Underground Station</u>
Pg.27.	Figure 5 NSGA policy framework edited to show National Planning Policy Framework (NPPF) in place of National policies
Pg.28	3.1.4 corrected to 3.1.3 and changed duplication, 3.1.6 refer to as Brent Local Plan Policy BE2: LSIS and intensification through co-location , Industrial land designation label made big, 3.1.10 abbreviations added to LSIS and SIL , 3.1.14 abbreviations added for WLO
Pg.29	Label added to page divider: <u>View of Neasden Lane between McGovern site (Glynn's scrapyard) and O'Hara site</u>
Pg 32.	4.1.1 abbreviation for NSGA and LSIS added, picture label amended to say Two storey terraced properties along Denzil Road
Pg.34	Figure 9 key amended with NSGA abbreviation and label amended to say NSGA sites red line boundary
Pg.34	4.2.1 Site 3a description amended to say 50 terraced housing dwellings
Pg.37	PTAL map amended as sent by TfL
Pg.39	4.6.5 Original text: Development at NSGA New text: Development of the protected waste sites in NSGA
Pg.41	Map and Legend amended to show and note only the Protected view to Wembley Stadium (not impacted by developments on NSGA)
Pg.41	4.8.2 New text: <u>There are no impacts on the protected view towards Wembley Stadium over the bridge on Neasden Lane due to developments on NSGA.</u>

DRAFT SPD CHAPTER/SECTION/PARA	CHANGES AND REVISIONS
Pg.44	Label added to page divider image- <u>Illustrative 3D visualisation sketch showing tomorrow's NSGA</u>
Pg.46	5.1.1 and 5.1.2 amended to make G and A capital while referencing Growth Area 5.2.1 amended to add scenario 1, scenario 2 and scenario 3 text in front of the three scenarios tested
Pg.47, Pg.48,Pg.49,Pg.50,Pg.51, and Pg.53	5.2.4, 5.2.5, 5.2.6,5.2.8,5.2.9 and 5.2.10 amended to add new text: <u>Site 6 is deemed unlikely to come forward for wholesale redevelopment based on the viability assessment, but may come forward on an individual and smaller site basis for mid-rise intensification.</u>
Pg.56	Label added to image (page divider)- <u>Illustrative 3D visualisation sketch of proposed NSGA masterplan</u>
Pg.58	6.1.1 amended to make G and A capital while referencing Growth Area
Pg 58	6.1.2 text amended to fixed minimum to ensure policy compliance.
Pg.59- 62	Tables 13,14,15,16,17 title amended to say Character Area <u>design parameters</u> and Landuse as Land use
Pg.62 and Pg.63	Titles amended to read Neasden Works and Depot Mews and Neasden Works and Depot Mews
	6.2.20 6.2.20. <u>Based on the topography of the site and the interface with Neasden Depot, a podium can be proposed across its extents with residential blocks above. However this is subject to detail assessment of the site. Due to the proximity of existing residential properties to the north of the site, it is considered that Depot Mews can support building heights up to four storeys to the west, rising to seven storeys in the east.</u>
Pg.65 to 67	6.3 development amount added (minimum) to all industrial floorspace targets
Pg.69	DP5 Recommendations: Old text: Sports England New text: Sport England
Pg.77	Label added to image (page divider)- <u>Illustrative 3D visualisation sketch of the proposed NSGA masterplan</u>
Pg.89	New text: <u>9.5.1. Design Review is an independent and impartial evaluation process in which a panel of multi-disciplinary experts on the built environment assess the design of a proposal. The process is in place to improve the quality of buildings and places and is widely recognised as having a positive impact. The importance of Design Review is specifically referenced in both the National Planning Policy Framework (NPPF) and the London Plan. As such, development at NSGA will be requested to come before the Brent Design Advice Panel (BDAP) to benefit from impartial discussion and constructive advice. The BDAP is managed on behalf of the Council by the Design Council. Further information is available at the Brent Council website - link to https://www.brent.gov.uk/services-for-residents/planning-and-building-control/design-and-placemaking/design-review/</u>
	9.7 contact and further guidance added new email: Email: planningstrategy@brent.gov.uk