

	Cabinet 22 May 2023
	Report from the Corporate Director of Communities & Regeneration
Church End Growth Area Masterplan Supplementary Planning Document	

Wards Affected:	Roundwood and Willesden Green
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	Four: Appendix 1: CEGA Masterplan SPD Appendix 2: Statement of Consultation Appendix 3: Church Road Design Guide Appendix 4: Equality Analysis
Background Papers:	Adopted Brent Local Plan
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1.0 Purpose of the Report

- 1.1 Brent Council Cabinet September 2022 approved the draft Church End Growth Area Masterplan Supplementary Planning Document for publication and

statutory consultation. This report sets out the consultation feedback, officer consideration and recommended changes to the document. It is recommended Cabinet approve the Church End Growth Area Masterplan Supplementary Planning Document for adoption.

2.0 Recommendation(s)

- 2.1 Cabinet to consider the consultation feedback, officer consideration and recommended changes to the Church End Growth Area Masterplan Supplementary Planning Document.
- 2.2 Cabinet to approve the Church End Growth Area Masterplan Supplementary Planning Document for adoption.

3.0 Detail

Background

- 3.1 Brent's Local Plan (2019-2041) was adopted in February 2022. The Plan sets out the vision and policies for development in the borough up to 2041, which includes the delivery of 23,250 new homes from 2019/20 to 2028/29.
- 3.2 Key to accommodating an increasing population are 8 growth areas, viewed as the most sustainable spatial expression for growth. The Church End Growth Area (CEGA) extends to 26 hectares, comprised of Victorian housing stock, the local town centre and 14 hectares of industrial land allocated for mixed-use regeneration. The Local Plan identifies CEGA to be promoted for mixed-use regeneration set around the economic revitalisation of the local centre and an improved public realm, to improve the area and change the perception of the place to a busy, thriving, safe and secure neighbourhood.
- 3.3 The CEGA Masterplan SPD is a long-term, ambitious and comprehensive plan that will help to secure at least 1,300 new homes and infrastructure to maximise opportunities and wellbeing for local residents, businesses and communities, including the provision of education, health, cultural and community facilities, open space and play facilities.
- 3.4 Since early 2021 officers have worked with consultants to develop the draft CEGA Masterplan SPD. This included extensive engagement throughout 2021, with a range of partners and stakeholders including residents and local councillors, businesses, community organisations, landowners, developers and statutory bodies.
- 3.5 As outlined in the Local Plan, the CEGA Masterplan SPD is required to provide clarity and detailed guidance for new developments, inform the assessment of planning applications, and be a material consideration for future planning decisions in the area. As such, the SPD document sets out a robust urban design framework comprising development, placemaking and environmental and sustainability principles. Together these principles are designed to ensure new development unlocks the potential of the area coherently and

comprehensively, creating a place where people choose to live, work and have fun, while also adhering to the highest environmental standards required to support climate change, resilience and transition to net zero carbon. The Council will be expected to review the document every 5 years.

Consultation

Pre- Statutory Consultation

- 3.6 Early consultation with local residents, businesses and communities in Church End over 2021 to inform development of the draft CEGA Masterplan SPD included:
- Interviews
 - [Common Place interactive platform](#)
 - [Regeneration Gap video](#)
 - Interactive workshops (2x) in community infrastructure and skills, training and employment
 - Spring Outdoor Engagement Event
 - School engagement with Leopold Primary School
 - Landowner engagement
 - Businesses Survey
 - Autumn Exhibition
 - Session with Brent Mencap Disability, Rights and Politics Group
- 3.7 Feedback indicated broad support for the drafted plan, and a great appetite for change but also highlighted demand for short-term investment to tackle key issues in the area i.e. deprivation, crime, lack of access to green spaces and affordable housing.

Statutory Consultation

- 3.8 The CEGA Masterplan SPD was subject to 7 weeks of formal consultation from 22 September to 10 November 2022. This was in accordance with the Regulations and the Council's Statement of Community Consultation (SCI). Statutory public consultation provided further opportunities for engagement with partners, stakeholders, local residents, businesses and communities.
- 3.9 Information about the CEGA consultation reached over 16,000 people via the Council's social media. There were 1802 hits to the dedicated CEGA website. 627 people, including residents and statutory consultees, attended the four consultation events. 192 people engaged in dedicated one-to-one discussions with officers. 97 people completed surveys available at our events and online via our consultation portal. 19 people/organisations issued formal consultation responses.
- 3.10 Details for the statutory consultation process were publicised on social media channels including Twitter and LinkedIn. Paper copies of the CEGA Masterplan SPD were made available at Wembley, Willesden, Ealing Road and Kingsbury libraries (Harlesden was closed under-going refurbishment), alongside

feedback forms. 1500 consultation flyers were distributed to residents in and around the CEGA. 4 consultation drop-in sessions were held in and around the CEGA to listen and answer concerns and queries regarding the draft Masterplan SPD. A wide range of stakeholders including individual residents, local organisations, councillors, statutory consultees, landowners and developers, and other interested parties identified on the planning policy contacts database were notified of the consultation.

Consultation Responses – Summary

3.11 In total, 116 responses were received on the draft CEGA Masterplan SPD during the 7-week consultation period., as per the table below:

	Vision Values and Objectives	Identified Challenges	Identified Opportunities	Proposed development for the site Allocations
Agree	70%	61%	54%	43%
Disagree	8%	11%	4%	7%

*The remaining percentages did not agree or disagree with the plans but provided comments which have helped to inform our response and updates within the document.

3.12 Whilst responses are broadly positive and supportive of the overarching vision for regeneration set out in the draft CEGA Masterplan SPD, consultation responses included specific questions and concerns, mainly in relation to the topics below.

Key topics of concern

3.13 Affordable housing: It was stated that more affordable housing is needed and should be available for local residents in need of more suitable accommodation, including key workers in health, education and the emergency services. In response it is noted that the Masterplan SPD supports delivery of at least 1,300 new high-quality homes and follows the Council’s policy that a minimum 35%, and where viable 50%, of new homes should be affordable, with a tenure split of 70% Social Rent/London Affordable Rent and 30% Intermediate Housing.

3.14 Green Spaces vs Building Heights: It was stated that more green space should be provided in appropriate locations to support the increase in housing. In response it is noted that the Masterplan SPD details Site Allocation policy requirements for new developments to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m² of additional green space, and also identifies areas for improvements to existing open spaces.

- 3.15 Health infrastructure: Questions were raised in relation to health infrastructure to support the increase in housing. In response it is noted that The North West London Integrated Care System (ICS) was consulted when developing the CEGA Masterplan SPD. The ICS stated that there is no current predicted need for an additional health hub/facility within the CEGA boundary. The CEGA Masterplan SPD does however designate Site Allocation BSSA2 for redevelopment to include a health facility should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years.
- 3.16 Educational Infrastructure: Questions were raised in relation to the educational infrastructure to support the increase in housing. In response it is noted that Brent's latest School Place Planning Strategy 2019-2023 indicates that Brent will continue to have a high number of spare places across the primary system at a borough level. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction in Neasden Lane.
- 3.17 Parking: Comments related to parking pressures, provision for Electric Vehicle (EV) charging, parking for elderly and disabled people, and parking for religious institutions in the locality. Reducing traffic congestion and CO2 emissions is a key priority. New developments within the CEGA are proposed to be car-free or car-lite, supported by provision for share mobility such as car clubs; and must provide 3% parking provision for disabled residents, and demonstrate capacity for 10% total future provision. Nevertheless, additional need for parking for people with disabilities and to access community facilities is recognised in an amended additional objective TM4: Inclusive Parking.
- 3.18 Cleaning and Fly-tipping: Comments related more to the existing situation in Church End and were not directly relevant to the Masterplan SPD. Respondents ask for more investment in initiatives to tackle these issues order to improve the local sense of pride and by consequence, community cohesion. Although tackling fly-tipping directly is outside the scope of the Masterplan SPD, Development Principle W3 Storage indicates that new developments need to adhere to a Site Waste Management Plan and Operation Waste Management Plan. This will ensure that on-site waste is effectively managed. Development Plan policies also require reductions in both construction and household waste.
- 3.19 Safety and anti-social behaviour: Additional concerns were raised that the Council should be more active in addressing these issues in the area. 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. In addition to the other design-related policies, the Masterplan SPD seeks to design out crime and follows the Secured by Design scheme published by the police. Developments are expected to provide passive surveillance and street lighting which help guard against anti-social behaviour.
- 3.20 Cycling: It was stated that better infrastructure should be provided, with minimum specifications seen as key to promoting safe active travel. Brent is

committed to improving cycle provision, safety and amenity for active travel modes, including cycle infrastructure that meets latest standards and guidance. Parts of CEGA fall within the Church End/Roundwood Green Neighbourhood area, where a number of traffic free and traffic reduced green routes for walking and cycling are proposed. The Masterplan SPD Section 5.2 on Movement and Connectivity sets out planned improvements for the local area (figure 30). Amendments made to this section provide more detail on proposed cycle infrastructure for the area. Due to many different road constraints, individual proposals will be assessed on their own merits when proposals come forward.

- 3.21 Young people: It was stated that more facilities and activities for them should be provided. A number of initiatives focusing on young people are expected to take place in the area. As part of the Masterplan SPD development, we have:
- BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people.
 - BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people.
 - BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.
- 3.22 Entertainment: It was stated that local provision should be included. The SPD area is located between Church End and Willesden Green town centres, and in proximity to Neasden and Harlesden town centres. Entertainment type uses are directed towards town centres in the first instance, to support their on-going vitality and vibrance. If such uses are spread too thinly, then they generally lack viability. As such the SPD prioritises provision of new jobs, homes, community space and open space, over entertainment uses which already exist in town centres. The Masterplan SPD acknowledges locations for music development, building on the existing local background. By doing this we plan to create an environment where creativity and entertainment is developed locally.
- 3.23 Supermarket: Comments stated that a new supermarket is required. The CEGA Masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed.
- 3.24 Heritage: Regeneration should value and preserve local heritage, including consideration of whether existing buildings need to be demolished to provide new facilities. The Masterplan has a section discussing heritage within the area (p 56-57). Development Principle H1 Heritage identifies the need to prioritise restoration and retention of architectural features in case of redevelopment.
- 3.25 Play: It was stated that more activities for children and play spaces that are fully accessible and inclusive for the community, should be provided. The Masterplan SPD (Figure 45) provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within

CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play. Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive safe play interventions across the CEGA. An indication of where future play facilities will be delivered can be found on figure 34.

- 3.26 High Street offer: It was stated that measures should be taken to ensure a more diverse local offer that support community needs. The existing high street offer contributes to the sense of belonging of many communities, but it could also better meet wider local need. The Masterplan SPD promotes spaces for young people, art and local enterprise as part of high street redevelopment. The Council seeks to guard against the over-proliferation of potential harmful uses such as betting shops, and takeaways. This is managed through Local Plan policy BE5, which considers their representation within the centre as a whole, and their location in relation to existing similar uses, including schools. It is not considered necessary to include this explicitly within the SPD itself.
- 3.27 Workspaces: It was stated that there is need for spaces for crafts and arts which reflect the diverse cultural ethnicity of the area and support community cohesion. Affordable workspaces are highlighted as a result of the early consultation activities and are incorporated throughout the plan, in line with planning policies BE1, BE2 and BE3. Affordable workspaces secured via S106 agreements are required to comply with agreed management plans. These can help ensure the spaces are supporting the local ethnicity and needs of the area.

Key concerns from Statutory Consultees

- 3.28 Statutory consultees responded on their areas of responsibilities, including Greater London Authority on planning policy and Transport for London. Landowners and developers emphasised the need for flexibility, and not to unduly constrain development, nor set overly prescriptive land use, design and infrastructure requirements. The proposal also received support from landowners i.e. Metroline for taking into account their requirements when proposing redevelopment.
- 3.29 Greater London Authority (GLA) stated that it was unclear what was the iterative process that Brent has been through with the Mayor and the GLA to distinguish an appropriate masterplan under Policy E7 in line with their industrial intensification practice note. GLA officers welcomed further engagement with the Brent to explore design principles to ensure high quality residential development is established alongside effectively operating industrial uses. In response it is noted that Brent Council has consulted the GLA throughout the development of the CEGA Masterplan SPD. Initial discussion took place in February 2021 prior to design development to ensure we followed the correct process for the masterplan adoption. First draft designs were shared with the GLA in October 2021 for feedback, but we received no response. It is also noted that the CEGA Masterplan SPD was match funded under the GLA Homebuilder Capacity Fund. In this situation it is reasonable for Brent Council to expect the GLA to be aligned in considering compliance with relevant policies. The team also met the GLA in November 2022. At the meeting, the process of developing

the masterplan and all engagement activities was explained. The GLA also emphasized the need to demonstrate more clearly the approach for Locally Significant Industrial Sites (LSIS), and changes have been incorporated to do that in the final version of the document (e.g. at Appendix F). The CEGA Masterplan SPD follows 'Industrial intensification and co-location through planned and masterplan approaches' by looking at LSIS sites; drawing on evidence of industrial supply and demand and identifying spatial context and non-standard uses. It proposes areas for intensification and co-location and a quantum of industrial capacity to be delivered, balancing specific local and community needs e.g. for new green spaces, community spaces and affordable homes, to help tackle deprivation, housing overcrowding and health related issues. The review post statutory consultation has presented a final opportunity to review and amend the document so it complies with GLA standards.

- 3.30 Transport for London (TfL) has made a number of comments highlighting the need for safeguarding pedestrian and cyclists' accesses throughout the CEGA and site allocations. It also indicated the need for better highlighting priorities for the different route hierarchy as well as providing more details regarding the proposed WLO station. The Movement and Connectivity section has been amended to address TfL' concerns. More detail has been added to Development Principles and included in the Road Hierarchy section.
- 3.31 Environment Agency (EA): Supportive of the plan, they highlighted the need to provide a stronger focus on the use of sustainable urban drainage systems (SuDs). EA also indicated further observations to be added as part of the development principles, as well as more details on mitigations for site allocations which will not be able to provide dedicated open/green spaces. Amendments have been made to the document to support the points raised.
- 3.32 The remaining part of statutory consultees were broadly supportive of the plans. Suggestions were made to improve the document and when possible/required amendments were made. The full detailed response can be found within Appendix 2.

4.0 Financial Implications

- 4.1 Costs for the CEGA Masterplan SPD were met through existing Regeneration budgets.
- 4.2 There are no spending commitments entered into as a result of the approval of this document. Any additional spending requirements in the future will be subject to further approvals.

5.0 Legal Implications

- 5.1 Town and Country Planning (Local Planning) (England) Regulations provide for Local Planning Authorities to adopt Supplementary Planning Documents. These documents are to provide more detailed guidance on how a development plan policy will be interpreted in the determination of planning applications.

Supplementary Planning Documents cannot introduce new policy or allocate sites for development.

6.0 Equality Implications

- 6.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have “due regard” to the need to:
1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
 3. Foster good relations between people who share a protected characteristic and those who do not.
 - 4.
- 6.2 Equality analysis has been undertaken and is at Appendix 4. Equalities analysis identifies that the CEGA Masterplan SPD and regeneration of the area has the potential for positive equalities impacts for people of all ages, people with disabilities, BAME communities and women. Analysis also identifies some businesses may need to move to alternative premises during redevelopment, and the CEGA Masterplan SPD expects new development proposals affecting industrial sites in Church End to include plans to retain local business and employment, with an appropriate phasing and business relocation strategy and mitigation adopted to protect and support businesses to stay local.

7.0 Consultation with Ward Members and Stakeholders

- 7.1 The Lead Member for Regeneration and Planning has been regularly briefed on the development of the CEGA Masterplan SPD. Ward councillors from the former Dudden Hill, Harlesden and Willesden Green wards were regularly briefed throughout 2021 on public engagement and development of the draft CEGA Masterplan SPD. Following the boundary changes and local elections 2022, newly elected ward councillors from Roundwood and Willesden Green wards were briefed on the draft CEGA Masterplan SPD in November 2022. It was also presented to the cross-party Local Plan member Working Group in December 2022.
- 7.2 Stakeholder engagement including with the Greater London Authority, Transport for London, local landowners and developers was undertaken during development and consultation on the draft CEGA Masterplan SPD.
- 7.3 Statutory public consultation was undertaken for an extended period of 7 weeks in line with the relevant Regulation and as set out in this report.

8.0 Human Resources/Property Implications (if appropriate)

- 8.1 Regeneration and Spatial Planning teams have developed the CEGA Masterplan SPD in-house, building on masterplan work developed by

appointed consultants Hawkins Brown, Jan Kattein Architects; PJA Transport Planning; Ramidus, Propernomics, BNP Paribas and Studio Vizable 3d.

Report sign off:

Alice Lester

Director Regeneration, Growth and Employment