

 Brent	Resources and Public Realm Scrutiny Committee 2 September 2025
	Report from the Corporate Director, Neighbourhoods and Regeneration
Brent Local Plan Review	

Wards Affected:	All except parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton, where the Old Oak and Park Royal Development Corporation (OPDC) is the Local Planning Authority.
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	None
Background Papers:	None
Contact Officer(s):	Paul Lewin Spatial & Transportation Planning Manager, Inclusive Regeneration & Climate Resilience paul.lewin@brent.gov.uk

1.0 Executive Summary

- 1.1. This paper addresses points that the Scrutiny Committee has indicated that it wishes to focus on in respect of the Brent Local Plan review. These are an overview of the Local Plan's performance to date, along with the key priorities, proposed scope, approach, and governance arrangements for the upcoming review.

2.0 Recommendation(s)

- 2.1 To note the contents of the report as a basis for discussion.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

- 3.1.1. The development plan and associated planning documents provide a positive framework for managing development to meet the borough plan priorities as follows:

1. Prosperity and Stability in Brent – The Plan seeks to address housing needs of the population for housing and necessary social and cultural infrastructure. By supporting extensive regeneration of parts of Brent, especially in its growth areas, its town centres and commercial areas and supporting business it provides increased opportunities for wealth generation and prosperity of Brent residents through providing access to local jobs. This will sustain its desirability and prosperity, whilst providing clear guidelines for development helps ensure stability in an area.
2. Thriving Communities – Addressing the wide range of needs of residents and businesses will better equip Brent communities in meeting the challenges and opportunities ahead. A strengthened sense of place provided through a clear vision for the development of Brent helps to improve development outcomes and create a sense of belonging which contributes towards community cohesion.
3. A Healthier Brent – Providing more and better homes, jobs, social infrastructure and improving the quality and amount of green infrastructure in Brent, encouraging walking and cycling, whilst reducing unnecessary vehicle movements will improve mental and physical well-being.
4. A Cleaner, Greener Future – New developments will deliver higher environmental standards, better addressing the threat posed by climate change and working towards the Council's goal to be carbon neutral by 2030.
5. The Best Start in Life – A principal determinant of future life chances for younger people is having a stable accommodation, including a home that is affordable, has sufficient space to live and growth in and internally provides a healthy environment. Brent's current development plan supports the delivery of as many homes as are realistically considered to be feasible in the period to 2041, a significant number of will be higher quality affordable homes, with higher levels of outdoor amenity space than standards set in the London Plan.

3.2 Background

- 3.2.1 The Council is required to have a Development Plan (also known as a Local Plan) in place that is up to date and regularly reviewed (at least every 5 years). It published a revised [Local Development Scheme in April 2025](#). This set out an indicative timescale for the West London Waste Plan and Brent Local Plan reviews. The West London Waste Plan is being taken forward with partner Local Planning Authorities (Ealing, Harrow, Old Oak Development Corporation, Hillingdon, Hounslow and Richmond) with project management support from the West London Alliance. The intention is to submit the Waste Plan for examination prior to the Government's December 31st 2026 deadline for plans to use the existing development plans adoption process.
- 3.2.2 The review of the Brent Local Plan will be subject to the new development plans process as initially set out in the Levelling Up and Regeneration Act 2023. This

will be subject to yet unreleased associated regulations and national practice guidance which will provide a more definitive process for taking plans through to adoption. Cabinet will consider a paper on the funding of the Local Plan review on 8th September 2025.

3.2.3 Performance of the existing Local Plan

Overview of performance against key targets, highlighting successes and areas of underperformance.

- 3.2.4 The performance of the Local Plan is reviewed and reported annually in the Authority Monitoring Report (AMR). Previous reports can be found on this link: [Authority monitoring reports | Brent Council](#) This is usually produced towards the end of the calendar year, reviewing the previous financial year. Some policies of the Local Plan might take some time to become apparent in their implementation due to development lag, i.e. it can for larger sites take about 5 years before policy outcomes can be seen in development that is completed/occupied. Feedback of the initial implementation however in terms of what might not work so well in terms of deviation from aims can become apparent through discussion with colleagues when considering planning applications and seeing how applicants and councillors respond to policies.
- 3.2.5 Housing is the most significant priority in national policy, the London Plan, Brent Local Plan and the Brent Borough Plan. The London Plan 2021 target significantly increased from a previous 1525 dwellings per annum in the old London Plan to 2325 dwellings per year for the 10-year period to 2028/29 (ie 23,250 new homes in the borough over the entire 10 year period). These targets are minimums, not a cap. The target is measured by the number of completions per year, not the number of homes granted planning permission, nor begun on site.
- 3.2.6 Brent's delivery prior to 23/24 was excellent. In the 3 financial years to 22/23 Brent delivered the equivalent of 8136 net additional dwellings (MHCLG official figures). This represented 131% of its target against the Housing Delivery Test (HDT). Delivery in 23/24 was however very weak at 656 net dwellings. This is not yet reflected in the latest MHCLG HDT figures but represents only 28% of the 2,325 annual minimum target. Completions for 24/25 have not been finalised but are likely to be well below the target. Lack of planning permissions are not what is holding back delivery. The latest [GLA datahub information](#) indicates that as of 31st March 2024, 16,985 dwellings had permission but had not been completed. It is other factors including viability, construction capacity, the contraction of the private sales market, investor caution and building safety regulator sign-off (for buildings 6 or more storeys) that are having the biggest slowdown impact.
- 3.2.7 In respect of other Local Plan housing objectives, the amount/ percentage of affordable housing, when compared to overall housing delivery, is below the 35% London Plan fast track route target and significantly below the 50% strategic Local Plan target. In 23/24 19.7% of the homes that were completed in the borough were affordable, and 26.7% of the homes that were approved

that year were affordable. For 23/24 homes delivered which were subject to an affordable housing S106 obligation, the percentage delivered was 44%.

- 3.2.8 The Local Plan has a target of 1 in every new 4 homes requiring permission being 3 or more bedrooms. In 23/24 delivery was below this at 12.2%. Delivery of this target is impacted by small scale schemes that might be for three or less dwellings, thus not required to provide a three-bed home; on larger schemes, there is often a trade-off reflecting the viability considerations. 3+ bedroom schemes do not attain the same values (per square metre) as properties with 1 or 2 bedrooms, thus requiring the 25% affects development viability and can reduce the number of affordable homes that can be delivered.
- 3.2.9 Significant successes have been the adoption of masterplan supplementary planning documents for the growth areas of Church End, Neasden Stations and Staples Corner, whilst a masterplan will be approved as part of the planning permission for Northwick Park growth area. These will support development of those areas once delivery picks up. Interest in the areas has increased significantly compared to when they were first allocated, and the SPD adoption process has increased the areas' exposure and awareness of the development sector in them and through clear guidance improves investor confidence.

3.2.10 In-depth analysis of the following areas:

a) Delivery of high-quality, sustainable, and affordable housing

- 3.2.11 The quality of new homes being delivered, particularly in major developments is high. London has the highest quality standards in the country delivered through policies and supporting guidance. Major developments are subject to the greatest level of professional advice for the developers (e.g. architects/ urban designers/ landscape engineers/ ecologists/ structural and mechanical engineers, etc) with a wider range of policies particularly related to attainment of sustainability standards required, e.g. energy efficiency, incorporation of renewables, carbon neutrality, air quality positive, etc. These schemes are also increasingly reviewed by the [Brent Quality Review Panel](#) and the [Community Review Panel](#) who provide an expert/ specialism-based critique of schemes at early stages of their development, which supports improvement. Many large schemes are also subject to a two stage GLA review, who, like the Council, have a wide range of development related professionals scrutinising the developments.
- 3.2.12 For minor developments, the range of policies that apply are fewer, in part reflective of the Government's position that to support the small builders' sector there should be lower costs/ simpler processes. In addition, many of the homes in this sector in Brent are delivered via conversions of existing homes (e.g. conversions of houses to flats). These factors can bring compromises that might not be applicable in larger schemes, e.g. no lifts, inability to provide outdoor amenity space for upper floor dwellings, encouragement to attain higher energy efficiency/ renewables, rather than requirement, etc.

3.2.13 The Council ensures that the quality of the affordable homes is consistent with that delivered for private homes. Applicants know that the Council will not accept obvious lower standards or development that is not tenure blind particularly in terms of outward appearance and location. There however, may be subtle differences, (e.g. communal facilities such as size of lobbies, corridor finishes, incorporation of soft furnishings, gym facilities) as registered providers seek to reduce on-going service charges to occupants.

Infrastructure-led development that integrates housing into complete, sustainable neighbourhoods with access to:

- **Social infrastructure (e.g. sports and community facilities)**
- **Green spaces**
- **Local services and shops**
- **Active travel infrastructure**

3.2.14 Brent's Local Plan policies focus most of the new homes delivery in the eight Growth Areas it identifies. Some of these have a relatively long history of delivery, e.g. Wembley, South Kilburn, Alperton, others are just emerging, e.g. Neasden stations, Northwick Park or Staples Corner. Each Growth Area is supported by Local Plan policies which identify the amount of development that is expected to come forward and the infrastructure that is required to support that development.

3.2.15 Most of the Growth Areas have been subject to masterplanning. This has either been undertaken by the Council taking forward an Action Plan (Wembley) or Supplementary Planning Document (such as Alperton, Church End, Neasden, South Kilburn and Staples Corner). In some cases, applicants have submitted a large outline application with an associated masterplan that has been subject to the Council's approval, (e.g. Northwick Park). Work is progressing on the Capitol Valley masterplan, part of the Burnt Oak/ Colindale Growth Area. These masterplans build on the information provided within the Local Plan policies, identifying the infrastructure needs and the location for that infrastructure.

3.2.16 Where required, the masterplans have referred to the need for additional on-site social infrastructure, e.g. public open spaces, health centres and schools. Wembley is the largest growth area and the most advanced in terms of delivery. Infrastructure provision associated with development is generally dependent on developer contributions. As it is a cost to developers, it usually has been delivered as the developments have progressed and gained some financial returns to developers. Most is incorporated within planning applications for the developments and their delivery.

3.2.17 For example, for Wembley Growth area, a large-scale public open space in the form of a new park which is north and south of Engineers Way and smaller scale public open spaces such as Elvin Gardens have been provided over time as part of developments. To date, the Wembley Park development incorporates new GP premises, a community centre (Big Yellow), two nurseries and affordable workspace, as well as all dwellings having access to a high-quality on-site amenity space (plus in the case of housing developments, communal internal facilities, gyms, etc). Ground floor commercial uses in residential blocks

address local resident and wider locality needs, complementing the town centre offer. Affordable housing has been delivered, with the amount/ tenure varying considering permissions granted, plus changes in market circumstances/ viability. A site has been allocated within the Local Plan for an additional primary school with nursery on the York House car park, should it be required in the future.

3.2.18 In the nearby Wembley Housing Zone development (Council led), there will be new public open spaces, enhanced public realm and a community centre.

3.2.19 Outside the infrastructure upgrades provided by development, Community Infrastructure Levy (CIL) payments which have been made by the developers have supported the provision of infrastructure such as the connection of North End Road to Bridge Road, the resurfacing/ landscaping of Olympic Way, replacement of the pedway with steps, plus anti-terror vehicle control measures, it has also part funded fit out of the GP surgery.

3.2.20 The public open spaces in this development are retained by the developer and paid for by the occupants of adjacent developments but required to be publicly accessible.

3.2.21 CIL has also been used or committed for the provision of infrastructure in several other areas. This includes a £5m contribution towards the provision of step free access for Alperton Station, a new pedestrian/cycle bridge over the canal in Alperton, the provision of new play facilities in some Alperton parks, funding towards the fit out of the new medical facilities in South Kilburn, the construction of a new primary school in South Kilburn, the upgrading and improvement of the South Kilburn Open Space, and road and connectivity improvements in Staples Corner.

3.2.22 Other funding sources where they become available are sometimes drawn upon. For Northwick Park, major improvements were required to the vehicular access arrangements before development could proceed. At £1m these were too costly for the development to deliver before start on site, so were funded by Government's Housing Investment Fund (£10 million), CIL (£3million) and funds from the developer partners.

3.2.23 Active travel infrastructure is being addressed in masterplan areas and larger developments through new street layouts and connectivity improvements, consistent with the TfL [Healthy Streets for London](#) Guide which promotes walking and, with traffic calming, an environment that is better for cyclists. Schemes incorporate cycle parking in line with London Plan minimums and design standards. Some improved connectivity measures to encourage more cycling will start to be taken forward through for example, the development of the Brent Active Travel Implementation Plan. Along with TfL funding for cycling/ transportation schemes, these measures, due to the limited TfL funds available may well require additional funding sources.

b) Climate change mitigation and resilience, including flood risk management

- 3.2.24 Major developments are subject to policies which address climate change and resilience, minor developments do not have the same level of policy requirements for all these matters but are encouraged to address them.
- 3.2.25 Major residential developments are required to reduce energy needs through design (capturing solar gain/ reducing overheating through orientation and building features) and fabric (insulation/ air tightness), support use of renewables and be carbon zero (or make an off-set payment where this cannot be achieved on site). Where possible growth areas should support/ make use of district heating/ cooling/ hot water systems or be able to connect into them in future if they are not available. Major non-residential developments are expected to be BREEAM excellent. There is a district heating in Wembley Park, and one for South Kilburn is currently being procured; one is proposed for Northwick Park and will address the residential heating/ cooling and hot water through an integrated development wide system making use of air source heat pumps.
- 3.2.26 In terms of ecology, all major developments are subject to the statutory 10% biodiversity net gain (BNG) uplift. Green infrastructure provision on site is enhanced where existing biodiversity might be low and the 10% uplift provides limited benefits, through the application of the GLA's Urban Greening Factor (UGF) of 0.4 for residential development and 0.3 for most commercial features.
- 3.2.27 For flooding, consistent with national policy a sequential approach is taken to development in terms of flood risk from all sources, based on the acceptability of the use's risk in the relevant flood risk zone. The Council has undertaken Strategic Flood Risk Assessments consistent with the requirements of national policy and guidance and justified where it has not been possible to avoid sites being identified for development in the floodplain. For site allocations, growth areas and other designations such as intensification corridors it sets out measures required to address flooding risk.
- 3.2.28 Where development occurs in floodplain (typically identified as having a 1 in 100-year probability of flooding), it is expected to be safe for the lifetime of the development. This also must account for climate change (design allowing shelter or safe access or egress in times of flood, floor levels above predicted flood levels and not increase flood risk elsewhere). In cases where development may not be able to raise floor levels above flood levels, e.g. industrial buildings, it is designed to be resistant or resilient should water enter, e.g. through use of materials that can withstand water and ensuring services (such as electrical equipment/ power sources, are not compromised e.g. by placing them above predicted flood levels).
- 3.2.29 Surface water is expected to be reduced to greenfield run-off rates wherever possible. For example, in Wembley Park the hard surface areas discharge to underground attenuation tanks/ structures with a limited outflow to the surface water pipe system leading to the Wealdstone Brook. This has significantly reduced surface water run-off in times of heavy rain compared to levels that occurred in the period prior to the new stadium being built. All schemes which

impact on the surface water network are reviewed and agreed by the Council's Lead Local Flood Authority officer. National and local policy prioritises sustainable urban drainage (SUDS) techniques over harder engineered solutions such as tanks or pipes. Developers are encouraged to integrate SUDS where possible into amenity space or public realm, as it can also assist in delivering UGF or BNG. For some very constrained sites (very high density on small site footprint) however, there might be a greater reliance on tanks.

c) Jobs and skills development

3.2.30 The Local Plan policies address several matters to support the local economy, e.g. site allocations for employment use, protection of employment sites and small employment premises (Policies BE2 and BE3), inclusion of 10% affordable workspace in significant employment developments and an Employment, Apprenticeship and Training Plan for developments of over 5000sqm or 50 dwellings (Policy BE1). The [Planning Obligations SPD](#) sets out more of the expectations in respect of developments providing jobs and skills development.

3.2.31 The focus in the construction phase is on apprenticeship opportunities being provided for borough residents who may be from a disadvantaged background or having been unemployed. Post occupation of commercial premises job opportunities/ training can sometimes be subject to agreements involving Brent Works to source some of the workforce for commercial tenants. In 23/24 it is estimated that approximately 300 job opportunities were created via S106 obligations for Brent residents. Further detail on the range of support Brent Works provide because of planning obligations and other activities is set out in the [AMR](#).

d) Gambling

3.2.32 Overall, over the last decade there has been a reduction in the number of licensed gambling premises across the borough. The biggest drop has been in betting shops/ bookmakers. Reductions in prize levels for fixed odds gambling machines, plus a large move of the sector in the last 5 years towards on-line gambling have resulted in the large betting shop chains reducing their physical presence in town centres and local parades.

3.2.33 There has however been increased interest from Adult Gaming Centres (AGCs) in providing more outlets. These often are focussed on disused betting shops (established gambling use which often have been vacant for some time) or banks (similarly vacant for some time).

3.2.34 Brent's Local Plan policy BE5 identifies a 4% frontage limit for betting shops and a 3% limit for adult gaming centres and pawn brokers, with an expectation of a minimum of four units allowed between the uses to prevent an over-concentration. This works well where the number of AGCs means that an additional AGC will break the 3% frontage length limit. Inspectors have supported the Council's refusals at appeals where this breach is used as a reason for refusal, e.g. Neasden. For some town centres however, the 3% limit

still provides some headroom for additional premises. All other reasons for refusal related to anti-social behaviour, harms to more deprived/ vulnerable residents, etc. currently hold little weight for Inspectors considering appeals. The AGC operators have empirical evidence gained from operating hundreds of units and dealing with many appeals that can refute what is often anecdotal evidence on harms that have been used as reasons for refusal. They set out company policy/ procedures/ training for staff that diminish the prospect of anti-social behaviour or identification of vulnerable/ addictive individuals/ behaviours and the time for intervention.

3.2.35 The Local Plan policy on gambling establishments will be reviewed. The policy needs to be clearer on the tests for over-concentration in respect of separation between any gambling use. Inspectors have interpreted the policy to require a gap between each of the named gambling uses, rather than between any type of gambling use. In addition, naming the end user typologies means new typology entrants to the market who do not fall within the identified categories are harder to control (e.g. recent move towards 'bingo halls'). The Council working with other Councils and local MPs is leading the lobbying of central government to change the licensing regime to allow the consideration of harmful impacts associated with a concentration of gambling premises. The Government has recently indicated to Brent MPs that it is considering strengthening councils' ability to influence the location and density of gambling outlets, through the introduction of Cumulative Impact Assessments (CIAs) in gambling licensing when parliamentary time allows.

3.2.36 If CIAs are introduced for licensing purposes, this should provide sufficient measures to control over concentration. If not, the Local Plan policy will need to try to address this matter in seeking to further limit over-concentration. If this is accepted through the examination process, albeit as indicated above, Inspectors appear to give limited weight currently to this argument. There however may be the ability to still address over-concentration in respect of its impact on vitality and viability of town centres, as its clear from responses to the last Local Plan review that a significant proportion of residents may avoid centres which are considered to have a proliferation of establishments.

3.2.37 Any new policy should refer to a more generic term such as licensed gambling establishments. Similarly, the 3% frontage limit in the larger centres such as Wembley, Harlesden and Kilburn High Road is ineffectual, in that there is quite a bit of headroom available. A more tailored approach to limits might be required for some town centres where it can be justified.

3.2.38 Scope of the Local Plan Review

What the review will and will not cover.

3.2.39 The review will be informed by three main factors:

1. The National Planning Policy Framework and any further review following its update in December 2024 (the main change was associated with

addressing housing need through a new standard method). The Local Plan should be consistent with national policy and guidance.

2. The revised London Plan and specifically increases in Brent's housing target. Brent Local Plan must be in 'general conformity' with London Plan policies. For Brent the large scale more obvious potential housing sites usually in Growth Areas are part built or have already been identified. This will mean sustaining high levels of delivery beyond 2031 will require additional sites with good prospects of delivery. This is more likely to require new housing on lower density suburban or similar sites that are already occupied by existing homes.
3. National development management policies. These may make some of the Local Plan's existing policies redundant, so need to be removed, or may require some local interpretation to make them work better for Brent.

3.2.40 The above is currently difficult to predict in terms of likely outcomes. At this stage, in respect of what will be reviewed, it is considered that the basic structure of the Local Plan in terms of setting out a vision, objectives, splitting the borough into places, that also have a vision and strategic outcomes identified, together with policies for larger development sites (allocations) works well and shouldn't be changed. A likely significant change in the borough's housing target to 2046 and possibly beyond will have spatial implications for all areas of the borough, which will likely affect the above sections in terms of detail. In addition, some site allocations have been delivered or have a full planning permission so can be removed from the Plan, whilst new ones will need to be added. To aid their delivery some urban design principles/ indicative site layouts may be beneficial and provide greater certainty of priority outputs being achieved. The continued population growth will require sufficient employment and social infrastructure, and where possible its location to be identified to provide added certainty of its delivery.

3.2.41 In respect of the topic area policies sections changes are likely to be required to reflect recent and proposed trends, e.g. during and post Covid the move towards on-line trading will mean some retail uses are diminishing, meaning town centres are at greater risk of contraction, whilst hospitality uses are also struggling, with existing numbers of pubs proving difficult to maintain as viable. The Council will need to review its viability tests/ periods of vacancy that are acceptable to ensure its not unnecessarily maintaining property vacancies. Review of the borough's green spaces indicates an inconsistency in categorisation and levels of protection provided for those not identified. These will need a detailed review and amended policy. The affordable workspace policy will need review to apply it to a lower size threshold of development. It was subject to change during the last examination by the Inspectors as it received objections, which the Council was not allowed to address properly due to submission of additional viability being inadmissible. The amount and concentration of student housing has also become a more pronounced concern for councillors and the Plan will consider how to best address this, balancing up London's strategic student housing needs against Brent's housing priorities including very high affordable housing needs.

3.2.42 Partial reviews of Local Plans tend to only be possible where a very limited number of changes are proposed to the Local Plan, e.g. Westminster's focussed on its affordable housing and zero carbon policies. Anything larger than this can end up being confusing and is likely to require justification why other policies are not being amended.

3.2.43 Given the scale of likely change related to matters identified above for Brent's Local Plan, it is anticipated a full review will be required. Early participation consultation can ask the question of which policies need review and what needs to be in and out of scope. Where policies are not replaced in their entirety, they may well be subject to minor changes that improve their effectiveness in delivering their objectives/ outcomes to that which was intended.

Rationale for the Review

3.2.44 The principal rationale for review is to embrace the need to plan longer term to meet the needs of a growing population to at least 2046 and possibly beyond. The largest priority is to ensure housing delivery can be sustained at high levels in the future. This requires identifying sites well in advance of when they are needed. Due to the complicated nature of future opportunities (the need to parcel up sites that currently include individual homes) this could well be longer than was needed in the past. Large single ownership sites such as Grand Union in Alperton are getting rarer. Sites are more likely to be like 1-22 Brook Avenue allocated in 2011, having publicly been identified 3 years earlier in the draft plan; this only had a comprehensive planning application submitted in 2023 (15 years after first being identified) and it is understood that full site ownership has still not yet been achieved by the applicant.

3.2.45 The Local Plan provides clarity to the community, councillors and developers about the long-term changes that are anticipated for the borough to accommodate sustainable growth. It supports investment and gives a positive message to investors that the Council is supportive of development and the benefits it can bring to the borough.

3.2.46 Government requires the Council to keep the Local Plan up to date, with a review of policy content required every 5 years. The NPPF sets out that to be up to date, Local Plan housing targets should have been adopted within the last 5 years to be current/ have significant weight. The new national needs methodology has radically altered nearly all Council housing targets. This will be addressed in the new London Plan. Brent will need to change its Local Plan to reflect these new targets.

3.2.47 The consequences of not doing the review will mean the Plan becomes out of date. This will lead to a loss of clarity to residents, businesses and developers on which policies should be used to assess planning applications. Development that is inconsistent with the current Local Plan is increasingly likely to gain permission, e.g. could involve loss of open space, leading to mistrust of the Council's policies and its advocacy in representing residents' needs and priorities.

3.2.48 Many developers praise the certainty that the current Local Plan brings to their investment decisions, which helps them prioritise Brent over other areas where greater risk of delays or costs associated with uncertainty arise. An up to date Plan is part of the wider picture and perception of Brent being a place to do business, which has supported its inward investment and delivering the fourth highest number of homes across London over the last decade. Apart from the direct investment this development makes, comes S106 planning obligations, CIL, New Homes Bonus, Council Tax and Business Rates income that supports the Council's delivery of infrastructure and services for the benefit of its population.

Contextual factors and reasons for undertaking the review e.g. alignment with national policy changes, infrastructure demands, and local challenges etc

3.2.49 This has been covered in the sections above.

Objectives - What the review aims to achieve.

3.2.50 The review seeks to put in place an updated Local Plan that provides a clear direction for how the borough will meet the challenges of population growth and economic challenges, and steer investment and infrastructure to meet needs in the most socially, economically and environmentally sustainable way possible. It will seek to ensure that a sound plan is produced that will pass through the examination process and be adopted by the Council in a timely and cost-effective manner.

Review Approach and Timeline - Process to be followed and key milestones

3.2.51 There is currently no certainty on the new Local Plan process in terms of the regulations and national practice guidance being in place, although these are currently anticipated later in the year.

3.2.52 In addition, the timelines are also based on the London Plan review timeline; the latest indication is that the draft London Plan will now be published post May 26 elections. Upper tier policies set out by Government and the London Plan are critical to the content of the Brent Local Plan which must be consistent with and should not needlessly duplicate them.

3.2.53 The expectation is that revised London Plan will not contain any 'surprises' for boroughs, however, to date GLA officers have not shared much of their emerging evidence base or policy options. There is no clarity yet on what the Plan will seek to do in respect of meeting the up lift in London's housing needs target set by the Government and how it will balance this against other priorities it has identified, e.g. retention of/ provision of additional industrial land, other development to meet the growing population's needs.

3.2.54 The GLA will, for the first time, be carrying out a review of the Green Belt boundaries, in line with central government's policy direction. It is anticipated that there may well be large scale revisions to the Green Belt boundaries suggested, albeit the GLA might leave the detailed changes to boroughs to deliver through Local Plan reviews. Although Brent does not have a Green Belt boundary, if the policy is changed to allow significant amounts of housing on current Green Belt land, then it may reduce the housing target for Brent and other non-Green Belt authorities. In any event, it is anticipated that a Green Belt review (and release/ redesignation as grey belt) will be a lengthy and controversial process.

3.2.55 The Local Development Scheme sets out a high-level timetable:

- Scoping and Early Engagement – March 2026
- First Formal Consultation January 2027
- Second Formal Consultation January 2028
- Examination June 2028 Adoption – January 2029.

Engagement Strategy - How stakeholders, including scrutiny committee members, will be involved throughout the review/refresh.

3.2.56 It is likely that engagement will be like that undertaken for the current Local Plan. The most intensive period of engagement is in the earliest stages. For example, for the last Local Plan early consultation included:

- An internal visioning and objectives session occurred with all managers and above (Heads, Service Directors, Corporate Directors) before any public consultation started. This sought to identify key issues for the Plan to address, this was supplemented by attendance at individual team meetings/ management meetings. A facilitated 2-hour session also occurred with CMT.
- 5 Drop-in sessions, which allowed members of the public to meet the team and discuss the issues and options in person
- 9 Workshops, where a presentation on the issues and options were provided, with group discussions on how it could be improved
- Targeted workshops and drop-in sessions were held with groups that are sometimes underrepresented in consultation events: - Brent Youth Parliament - Brent Multi-faith Forum - Disability Rights and Politics (DRAP) Brent - Parents with young children via Barnardos' children's centres.
- Councillors through Brent connect forums, the drop-in sessions and workshops, plus the Local Plan Working Group (more below in governance section).

The consultation was promoted under the brand Shape Brent using the following methods:

- Social media - Twitter, Facebook, Yammer using #shapebrent
- Eventbrite
- Leaflets and posters/roller banners in Council Buildings
- Posters in Park Notice Boards
- Exhibition and flyers at Drop in Sessions
- Emailing Local Plan and Community Database
- Emailing Brent Citizen's Panel
- E-newsletter
- Promoting at Brent Connects Events and via Brent Connects mailing list
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent
- Main Council webpage and dedicated website
www.brent.gov.uk/shapebrent
- The Brent Magazine summer and autumn issues
- Article in Brent & Kilburn Times
- Elected Members' News bulletin.

There was an interactive map through Common Place that allowed residents/ anyone to comment on any part of the borough in terms of what they liked/ didn't like and what should be improved through the Plan.

In addition to this were forums for developers/ registered providers/ property owners/ investors. There was also engagement with statutory consultees for example the Environment Agency in relation to the Strategic Environmental Assessment that accompanies the Plan and boroughs/ agencies/ infrastructure providers related to the Duty to Co-operate.

There were two further formal consultation periods (preferred options and draft Plan publication) with similar forms/ levels of engagement. This included a leaflet delivered to every household in the borough for the preferred options draft Plan.

3.2.57 The Brent Local Plan, including its consultation and engagement processes were recognised as very good practice, being recognised in 2023 as the Best Local Plan in the RTPI's London awards and shortlisted in the national awards.

Governance & Decision-making - Roles and responsibilities of officers, members, and oversight arrangements.

3.2.58 To involve councillors more closely throughout the Local Plan adoption process, last time a Local Plan Working Group was set up. This comprised 10 councillors from all political parties with representation across the borough. Councillors were invited by the Cabinet member. It met regularly at all 12 times prior to the submission of the Plan. A similar approach is likely with the review.

3.2.59 To reduce the time taken to get the Plan to the submission stage, consultation material and the early draft versions of the Plan were subject to delegated agreement by the Cabinet member in consultation with the Corporate Director. Cabinet agreed the final Plan for submission for examination. To assist through the examination process officers were delegated to propose modifications that

would enable the Plan to be found sound. Formal approval of the final modifications to be consulted upon was again delegated to the Cabinet member in consultation with the Corporate Director. Adoption of the Plan was by Full Council, following consideration by Cabinet. Again, a similar process is anticipated for the review

Risks and Challenges - Identification of potential risks, including budget, resourcing, and delivery challenges.

- 3.2.60 The timetable suggested in the LDS is in part seeking to reduce the potential risks associated with changes to the NPPF, national development management policies, the changes to the Local Plan system bedding in and the London Plan review. A very early start on the review would increase the number of fundamental risks that could arise. For example, in respect of the London Plan, the Council must be relatively clear about the likely housing target it will be set. Radical changes to that Plan could have significant impacts on Brent's policies. Large changes in population numbers due to London Plan policy changes could impact on evidence base studies to support the Local Plan and, also the strategy for the development of the borough. This might lead to delay or expensive revisions to the evidence base, or the Council going back to an earlier stage of the Local Plan process to address these issues.
- 3.2.61 In respect of budget, the Cabinet paper has been pitched at a realistic point in terms of assumed cost of £880K. This is above the lower end estimate of £500K which would require much of the evidence base work to be done in house, leading to increased time and resource being pulled away from other planning activities. The upper end estimate is £1.6million, which assumes greater level of evidence base required/ higher evidence base costs due to capacity constraints as many Councils will be doing a Local Plan review, a protracted examination/ adoption process, and if the Council is not successful in addressing known needs from the overcrowding at Lynton Close prior to the review, site allocations being required for traveller pitches.
- 3.2.62 Staff resources – although the core team is currently stable, should this change, recruitment challenges within the wider planning sector could impact on the Council's ability to progress with the review.
- 3.2.63 Legal and procurement support will also be critical.
- 3.2.64 To date much of the population of Brent has accepted the ambitious levels of development that the last Local Plan promoted. The next Local Plan may well have to deal with accommodating more development amongst suburban housing, most of which will be in good condition and privately owner occupied. As well as potentially affecting more people's homes, it could more likely to result in more areas having more substantial changes in character compared to currently. This may well increase the amount of objection and challenge to the plan from Brent residents or community groups. This could again slow down the plan's delivery, requiring further levels of engagement and revision to plan content or policy direction.

3.2.65 In respect of the Plan's ambitions, given the viability and construction challenges, the ability of the sector to deliver significant numbers of homes of all tenures, is a risk to the delivery of the Plan's policies.

3.2.66 In addition, Government's Housing Delivery Test (which tests housing delivery against Local Plan housing targets over the last 3 years) and Five Housing Land Supply test (which requires sufficient supply of deliverable housing sites to achieve the next 5 years' Local Plan housing targets) if not delivered can have significant implications for the Plan. In such cases, the Plan risks being considered out of date in respect of some of its policies, or alternatively limited weight being placed on them. This might mean the undermining of core policies, e.g. protection of/ retention of open space, or industrial land. Not being able to placing significant weight on Local Plan policies may mean that Planning Committee in reflecting residents' concerns about outcomes inconsistent with the Plan's policies in any case refuse permissions. This may lead to more appeals being submitted and at its extremes risk of the Council paying developer costs where it cannot reasonably defend decisions overturned by the Planning Inspectorate.

4.0 Financial implications

4.1 It is considered that when funding for the review is agreed, processes will be in place to ensure that the identified budget is adhered to.

4.2 The Local Plan is a significant element in supporting development delivery. This has positive implications for the Council's income in respect of New Homes Bonus, Council Tax, Business Rate Uplift, CIL and S106 contributions for infrastructure plus, affordable housing grants and other government funding streams that might become available to support growth.

5.0 Stakeholder and ward member consultation and engagement

5.1 The appropriate levels of consultation and engagement consistent with the Council's Statement of Community Involvement regarding Local Plans will be undertaken. The Lead Member will be kept regularly updated on progress.

6.0 Legal Considerations

6.1 The processes will be consistent with the relevant Regulations once they have been enacted. Prior to adoption by the Council the draft Local Plan will have some limited weight in the determination of planning applications, post adoption the weight will be significant.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 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:

- a) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
- c) Foster good relations between people who share a protected characteristic and those who do not.

7.2 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

7.3 The Local Plan review will be subject to full equality impact assessment.

8.0 Climate Change and Environmental Considerations

8.1 The Local Plan is required to support sustainable development. There may be a requirement to include policies that are Brent specific if climate change and environmental considerations are not appropriately addressed in national policy, national development management policy or London Plan policy.

9.0 Communication Considerations

9.1 Consistent with the approach to the previous Local Plan review, there will be an appropriate level of communication's team support to raise awareness, e.g. through press releases/ council social media notifications to complement the engagement measures set out in the Councils' Statement of Community Involvement.

Related documents:

[London Plan March 2021](#)

[Brent Local Plan 2019-2041](#)

[National Planning Policy Framework Dec 2024](#)

Report sign off:

Alice Lester

Corporate Director, Neighbourhoods and
Regeneration