



MATTER 2: SPATIAL STRATEGY AND STRATEGIC POLICIES

General

Throughout the Plan and in some of the minor modifications, the outline planning permission for Brent Cross is stated as dating from 2010. The operative permission is the Section 73 consent granted on 23 July 2014 (Ref. F/05687/13). This should be corrected to ensure clarity and consistency throughout the Plan.

Question 5: Is the spatial strategy for the Borough and the overall distribution of development proposed in the Plan as set out in Policy BSS01 based on relevant and up-to-date evidence?

Policy BSS01(a)(ii) is proposed to be modified (MM19) to refer to *'395,000m² of new office space and 56,600m² of new retail space at Brent Cross Growth Area'*. However, the figure of 56,600m² relates only to land north of the A406 (Brent Cross North). There is also retail space consented to the south of the A406 (Brent Cross Town). This should be reflected in BSS01, as well as in GSS01 and throughout the Plan (including in paras. 4.5.5, 4.9.4, 7.5.1, and in the monitoring indicators on page 265).

Question 6 (f): Are the approaches to boundaries and extents of the Growth Areas in general conformity with the London Plan, which identifies Opportunity Areas at New Southgate, Colindale/Burnt Oak and Brent Cross/Cricklewood. If not, are variations justified?

Question 6 (g): Are the Council's proposed modifications to the Plan and the Key Diagram in relation to the Growth Areas and their boundaries, necessary for soundness?

Our view is that the proposed modifications to the Plan and Key Diagram are necessary for soundness. As highlighted in our letter of 09 August 2021, the terminology in the submission version of the Plan is confusing, and the Key Diagram as currently presented is inconsistent in the way it shows the various designations covering Brent Cross. The proposed modifications to the naming of the relevant Growth Areas provide the necessary clarity, and the replacement Key Diagram now clearly shows the relationship between Growth and Opportunity Areas.

We note that the three Growth Areas designated at Brent Cross, Brent Cross West (Staples Corner) and Cricklewood still does not reflect the full extent of the Brent Cross/Cricklewood Opportunity Area as designated in the London Plan, which is now clear from the dotted red line on the replacement map. There appears to be no justification provided as to why these boundaries do not align (as they do with the Colindale Opportunity Area, for example). We consider that this matter needs to be clarified and explanatory text added to the Plan.

Question 7 (e): Are the relevant criteria of Policies BSS01, GSS01 and GSS02, justified and clearly written and unambiguous so it is evident how a decision maker should react to development proposals in the Brent Cross Growth Area?

A Minor Modification has been proposed to the second paragraph of Policy GSS02 to replace the word ‘*must*’ with the words ‘*are expected to*’. This indicates some flexibility but still implies that all of the criteria listed should be met by every development proposal, irrespective of its nature, size or scale. We do not consider this to be an effective or deliverable approach. We refer back to the suggested wording in our Regulation 19 response and consider that this part of the policy should read:

“Development proposals within the Growth Area ~~must~~ should, insofar as is relevant to the proposal.”

A similar issue arises in the ‘Transport Improvements’ section of Policy GSS02, which implies that each discrete development proposal will be required to bring forward all of the transport improvements listed. This cannot be the intention. Again, we have suggested the following wording:

“~~Development proposals will need to bring forward the following~~ The following transport improvements will be brought forward within the Brent Cross Growth Area through detailed design, planning conditions and/ or Section 106 agreements.”

Question 7 (f): Are the potential modifications to Policy GSS02 and its supporting text as put forward by the Council necessary for soundness and/or would any further changes be required?

We welcome the modifications made to Policy GSS02 in respect of optimising site capacity across the Brent Cross Growth Area and consider that this is necessary for soundness.

However, the unique opportunities presented by the Brent Cross Growth Area should be recognised in Policy GSS02, including that it is a suitable location for Build to Rent (hereafter ‘BtR’) development, and is an appropriate location for tall buildings. The policy should explicitly express support for these types of developments. This would provide consistency throughout the Plan (for example with Policies CDH04, HOU6 and their supporting text) and provide a clear policy basis for developments in the Growth Area going forward.

Two modifications (MM55 and MM58) are proposed to the two paragraphs setting out the status of the detailed consents obtained for Brent Cross to date (paras. 4.12.4 and 4.14.6). We consider that the wording of these two paragraphs should be consistent.

A modification (MM59) proposes to remove the reference in para. 4.15.1 to the outline planning permission being ‘*nearly a decade old*’, which we welcome. However, MM59 still refers to the permission as being ‘old’. We consider that the word ‘old’ is unnecessary and should be removed. Please refer also to our comments above that the correct permission is from 2014, not 2010.

Two minor modifications (MM60 and MM66) are proposed which deletes the reference to retrospective infrastructure costs and attempts to clarify that the approach to infrastructure delivery should be determined on a case-by-case basis. Whilst we understand the need for these modifications, we do not consider that the term '*bespoke approach*' is clear and unambiguous. These modifications also do not recognise that there is already a Section 106 agreement in place for the outline planning permission for the Brent Cross Growth Area.