

**INDEPENDENT EXAMINATION OF THE KILBURN
NEIGHBOURHOOD DEVELOPMENT PLAN 2022-2033**
EXAMINER: DEREK STEBBING BA (Hons) DipEP MRTPI

David Kaye
Co-Chair Kilburn Neighbourhood Plan Forum

Ajay Krumble
Co-Chair Kilburn Neighbourhood Plan Forum

Paul Lewin
London Borough of Brent

Kate Goodman
London Borough of Camden

Examination Ref: 01/DAS/KNP

28 July 2025

Dear Ms Goodman, Mr Kaye, Mr Krumble, and Mr Lewin

KILBURN NEIGHBOURHOOD DEVELOPMENT PLAN EXAMINATION

Following the submission of the Kilburn Neighbourhood Plan (the Plan) for examination, I would like to clarify several initial procedural matters. I also have a number of questions for the Kilburn Neighbourhood Forum (the Qualifying Body), the London Borough of Brent (LB Brent), and the London Borough of Camden (LB Camden) to which I would like to receive a written response(s) by **Friday 22 August 2025** if possible.

1. Examination Documentation

I can confirm that I am satisfied that I have received the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement, the Strategic Environmental Assessment (SEA) Screening Opinion and the Regulation 16 representations, to enable me to undertake the examination.

2. Site Visit

I will aim to carry out a site visit to the neighbourhood plan area during the week beginning 18 August 2025. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.

3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

From my initial assessment of the Plan and supporting documents, I have identified a number of matters where I require some additional information from the London Boroughs of Brent and Camden and the Qualifying Body.

I have four questions seeking further clarification, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response(s) by **Friday 22 August 2025**.

5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 6-8 weeks of submission of the draft Plan. However, as I have raised four questions, I must provide you with sufficient opportunity to reply. Consequentially, and dependent on when you are able to reply, the examination timetable may be extended. Should thus occur, please be assured that I will aim to mitigate any delay as far as is practicable. The IPe office team will seek to keep you updated on the anticipated delivery date of the draft report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on the Qualifying Body and on the London Boroughs of Brent and Camden websites.

Thank you in advance for your assistance.

Your sincerely

Derek Stebbing

Examiner

ANNEX

From my initial reading of the Kilburn Neighbourhood Plan 2023-2033 (Submission Version dated July 2024), the supporting evidence and the representations that have been made to the Plan, I have the following four questions for the Qualifying Body and the London Boroughs of Brent and Camden. I have requested the submission of responses **by Friday 22 August 2025**, although an earlier response would be much appreciated. Where I am requesting additional clarification, suggested text and similar, this is with a view to informing the specific terms of any relevant examiner modifications that I may recommend. Accordingly, all of the points set out below flow from the requirement to satisfy the Basic Conditions.

Question 1: Re. Kingsgate Place, Kilburn, NW6

A Representation (Ref. Rep. No. 10) has been submitted expressing concerns regarding the environmental conditions (relating to traffic volumes, air quality and noise) for residents living in Kingsgate Place (which is situated to the east of Kilburn High Road) and the draft Plan's omission of any policy, proposal or commitment to address such issues. This is stated to be contradictory to the Plan's goals of creating a welcoming and pedestrian-friendly Kilburn.

I will visit Kingsgate Place during the course of my site visit, but I would be grateful if the **Qualifying Body** could advise me to what extent any issues concerning Kingsgate Place were raised during the preparatory stages of the Plan's production and whether Kingsgate Place was identified at any point as a potential "Area for Intervention", or to be potentially linked to other initiatives for environmental improvements in the Kilburn High Road area.

Question 2: Re. Appendix 2 – Kilburn's Local Heritage (Pages 45 and 46)

A Representation (Ref. Rep. No. 25) has been submitted setting out a number of omissions from the list of Locally Listed Buildings in Appendix 2, and an error concerning the Listing details of Paddington Old Cemetery.

The same Representation also sets out some possible errors, inconsistencies and omissions concerning the Open Green Spaces Map (Figure 5).

Before I consider these parts of the draft Plan in more detail, can the **Qualifying Body** please review the matters raised by this Representation and, if necessary, provide me with a Note setting out any proposed amendments to Appendix 2 (and possibly also to paragraph 6.10) and Figure 5 that I might consider as potential recommended modifications to the draft Plan.

Question 3: Re. Kilburn Flood Risk Areas – Figure 6 (Page 16)

I note from Figure 6 (and also paragraphs 5.17 and 5.18) that some significant parts of the Plan area are at Medium and High Risk of Surface Water Flooding.

From my initial assessment of the draft Plan, I do not identify any specific policy interventions that would seek to mitigate any impacts from surface water run-off that might arise from additional developments in the Plan area. The only mitigation that I do identify is the possible introduction of 'rain gardens' as part of the Public Realm initiatives set out in (non-policy) Project Box A.

At present, I view the draft Plan's lack of policy material concerning the management of Flood Risk in relation to new developments as an omission that should be addressed.

In my assessment, the Plan should be confirming a requirement for new developments in the Plan area to incorporate Sustainable Drainage Systems (SuDS) and other such measures to mitigate surface water run-off to adjoining areas. It seems to me that the most appropriate place for this

policy requirement is as an additional sub-section to Policy CK1, with some appropriate supporting text to follow paragraph 6.19.

Can the **Qualifying Body** please review the points that I have made above and provide me with a Note that sets out potential amendments to the draft Plan that address the mitigation of Surface Water Flood Risk across the Plan area, which I may consider as potential recommended modifications to the draft Plan.

Question 4: Re. Brent Local Plan and Camden Local Plan

Can the **London Borough of Brent** please confirm that the proposed Review of the adopted Brent Local Plan is intended to proceed according to the timetable set out at Page 14 of the latest Local Development Scheme (LDS), published in April 2025?

Can the **London Borough of Camden** please confirm that the next stages of the emerging new Camden Local Plan 2026-2041 are intended to proceed according to the indicative timetable set out at Appendix 1 of the latest Local Development Scheme (LDS), published in March 2025?

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