

## Survey:

What is your name? Dominvs Group

### 1. Which part of the Plan are you commenting on?

Policy:	<input type="checkbox"/> BE3 <input type="checkbox"/> BCSA4 <input type="checkbox"/> BE3 <input type="checkbox"/> BE9	Paragraph:	<input type="checkbox"/>	Table:	<input type="checkbox"/>	Map:	<input type="checkbox"/> Policies Map
---------	--------------------------------------------------------------------------------------------------------------------------------	------------	--------------------------	--------	--------------------------	------	---------------------------------------

### 2. Do you consider the Plan is:

Legally compliant?	Yes:	<input type="checkbox"/>	No:	<input type="checkbox"/>
Sound?	Yes:	<input type="checkbox"/>	No:	<input checked="" type="checkbox"/>

### 3. If you believe the Plan to be unsound, is this because it is not:

Positively prepared	<input checked="" type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
Consistent with national policy	<input checked="" type="checkbox"/>

### 4. Please give reasons for your objection or support:

#### **Site Allocation BCSA4: FIFTH WAY/EURO CAR PARTS**

- We object to the inclusion within the 'Planning Considerations' section that *'the council will seek no net loss of employment floorspace and if a plot ratio of 0.65 is greater, encourage the maximisation of its provision suitable for B1 (c), B8 and B2 use as a part of any redevelopment of this site'*. The reasons for this objection include:
  - Brent's status as a 'provide capacity' borough and the associated draft London Plan requirement that Brent should seek to deliver intensified floorspace capacity in either existing and/or new, well-connected locations is understood. However, we do not consider it to be the intention of the draft London Plan for a 'provide capacity' Borough to impose a blanket requirement of 'no net loss' of industrial floorspace capacity across all sites, and it is notably unjustified to impose this upon a Non-Designated Industrial Site with a long-term allocation for mixed-use, residential led development such as this. This is evident in:
    - 1) Draft Policy E4 being focussed on achieving no net loss of industrial floorspace capacity within designated SIL and LSIS;
    - 2) supporting paragraph 6.4.5B specifying that *'the principle of no net loss of industrial floorspace capacity applies to overall areas of SIL and LSIS, and not necessarily to individual sites within them'*;

3) Parts C and E allowing the release of industrial land to achieve wider planning objectives and other planning priorities including housing; and  
4) the inclusion of Draft Policy E7 D 2) which states that mixed-use or residential development proposals on Non-Designated Industrial Sites should be supported where it has been allocated in an adopted local development plan document for residential or mixed-use development.

- We consider that a more effective, positively prepared strategy response to providing additional industrial capacity across the Borough, consistent with draft London Plan policy, would be for the Council to firstly seek and quantify significantly increased intensification and co-location of industrial uses on underutilised SIL and LSIS designated land (such as the SIL land situated east of the Site).
- It is unjustified in the context of (and inconsistent with) draft Local Plan Policy BE3 (Local Employment Sites and Work-Live), which states the Council will allow the release of Local Employment Sites to non-employment uses where development increases the amount of affordable workspace in the B use class.
- the Council's reason for introducing this requirement at this stage, being '*Brent's status as a provide capacity borough*' is not justified – as referenced throughout the previous version of the draft Local Plan, Brent had already been identified as a 'provide capacity' Borough when that Preferred Options version was published, and rightly no equivalent requirement for 'no net loss' of employment floorspace was made within this Site Allocation then. Instead this same reason/status was stated at that time only to '*mean that employment uses should now be provided as a part of any redevelopment of this site*', with the relatively less onerous requirement of '*2,500 sqm of business floorspace*' specified;
- It is further not justified to include this requirement within this specific Site Allocation, as this is inconsistent with other parts of the draft Local Plan. Policy BP1 (Central) and paragraphs 5.1.22 & 5.1.29 repeatedly make specific reference to realising increased potential for land at First Way and Watkin Road to incorporate a greater proportion of employment floorspace, but do not set out any equivalent, explicit requirement for land at Fifth Way/Fulton Road to do the same.
- We continue to support the proposed allocation of the site for mixed-use, residential-led development and the inclusion of 'Hotel' as an allocated use. This in accordance with National and London Plan policies for this location which is a designated Growth Area, Opportunity Area and Strategic Cultural Area and is also in accordance with draft Local Plan policies BP1 and BCGA1.
- We support as flexible a range of allocated uses and indicative capacities as possible, to reflect the on-going pre-application discussions and live design work. This is necessary to ensure that the site can be optimised and achieve its full development potential in the future via Development Management processes, in accordance with National and London Plan policies.
- We continue to support the site being identified as appropriate for tall buildings and welcome the revised wording on this point.

### **Policy BE3 – LOCAL EMPLOYMENT SITES AND WORK-LIVE**

We object to this policy as drafted, on the following grounds:

- It is not justified as it is inconsistent with draft London Plan Policy E7 D 2) which as above states that mixed-use or residential development proposals on Non-Designated Industrial Sites should be supported where it has been allocated in an adopted local development plan document for residential or mixed-use.
- It has not been positively prepared and is ineffective as the requirements within supporting paragraph 6.4.23 are disproportionately onerous relative to the content of the policy itself. Such requirements include an increase in the amount of employment floorspace on the site in the B use class.

### **Policy BE9 – VISITOR ACCOMMODATION AND ATTRACTIONS**

- It is unjustified and inconsistent with adopted and emerging London Plan policy for the Wembley Strategic Cultural Area to have been omitted from the identified suitable locations for hotels and other visitor accommodation (relative to the previously published version of the policy).
- This is further inconsistent with the vision for the 'Central Place' and Policy BCGA1 within the draft Local Plan which both specify hotels as contributing to a mix of uses in the Wembley Growth Area.
- The reference to hotels and other visitor accommodation being appropriate in sites allocated in the draft Local Plan is supported.

### **POLICIES MAP**

We object to the content of the Policies Map which is not effective, as it is not possible to identify the various designations which overlap with, and are hidden by, one another. It is not clear whether the 'egg' shaped blue dashed line centred around Wembley is intended to depict a Tall Building Zone – if so, this appears incorrect and should reflect the Tall Building Zones shown for this area within the Brent Tall Buildings Strategy (October 2019), which are supported.

## **5. What change(s) do you consider necessary to make the Plan legally compliant or sound?**

### **Site Allocation BCSA4: FIFTH WAY/EURO CAR PARTS**

- In order to make this site allocation policy sound, we consider it necessary to remove reference to 'no net loss' or a 'plot ratio of 0.65' in relation to the requirement for employment floorspace on this Non-Designated Industrial Site. Dominvs Group would consider it sound if the Council reverted to the previous, more flexible wording included on the same point in the Preferred Options version, namely '*employment uses should now be provided*' and '*2,500 sqm of business floorspace*' specified.

### **Policy BE3 – LOCAL EMPLOYMENT SITES AND WORK-LIVE**

In order to make this policy sound, we consider it necessary to:

- add an 'or' to the end of part b) and add a part c) to the first part of the policy which reads '*where it has been allocated for residential or mixed-use.*' (or similar).
- Remove parts a) and b) from supporting paragraph 6.4.23 to make subsidiary requirements consistent with and proportionate to the policy wording.

### **Policy BE9 – VISITOR ACCOMMODATION AND ATTRACTIONS**

- In order to make this policy sound, we consider it necessary to reinsert the Wembley Strategic Cultural Area as an appropriate location for hotels and other visitor accommodation.

### **POLICIES MAP**

In order to make this policy sound, we consider it necessary to ensure all designations are legible and correctly drawn.

## **6. If your representation is seeking a change, do you wish to participate at the oral part of the examination?**

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We reserve the right to participate in the future Examination in Public to consider the soundness of the version of the Plan submitted to the Secretary of State. This is considered necessary in the context of the points raised within these representations.

**If you would like to comment on additional policies, please fix another sheet to this.**

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.

- Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.