

Q. SQUARE

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By email:
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05 December 2019

Dear Sir / Madam

**Consultation Response on behalf of London Hotel Group
Brent Draft Local Plan Regulation 19 Consultation – 24 October to 5 December 2019**

Thank you for the opportunity to engage with the preparation of Brent's new Local Plan (Regulation 19 Consultation).

We write on behalf of London Hotel Group ('LHG') setting out both our support for the draft Local Plan Regulation 19 publication ('draft Local Plan') and our suggested amendments to it.

LHG operate several hotels across London, including hotels in London Borough of Brent. They are experienced in delivering hotel development in London and have an interest in the Council's aspirations for this part of Brent.

LHG are the owner of several properties along Elm Road and St. Johns Road. This includes the properties on 1 to 11 Elm Road which achieved permission (reference 18/1592) for:

'Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 226 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 5-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities.'

In the context of LHG's current investment in Brent through the Elm Road hotel site, and in relation to any other sites which LHG may seek to bring forward in Brent in the future, LHG supports the aspiration of the draft new Local Plan to provide a planning framework and vision for change and good growth concentrated in accessible areas.

We are of the view that development growth is vital in order to ensure that Brent continues to fulfil the opportunity that it creates for London. The ambition of the new Local Plan should therefore focus on providing a framework that responds to community needs but that also maximises and facilitates the delivery of new development. LHG are keen to ensure that the new Local Plan enables these two objectives to be achieved without prioritising one over the other.

Representations to Brent New Local Plan Consultation

We set out below an executive summary highlighting LHG's key suggested amendments to the draft Local Plan in relation to affordable housing, design (including height), town centre and employment policy, residential, parking and Site Allocation BSWA10 Elm Road. Further detail is set out in the body of the representation.

Executive Summary

Site Allocation BSWA10 Elm Road

- LHG supports the aspirations of the Elm Road Site Allocation. However, it is considered that the capacity for residential dwellings (currently identified as circa 400 homes) can be exceeded and that circa 1,300 dwellings can be delivered in line with the Council's aspirations for meeting housing demand in Wembley Growth Area.
- It is also considered that the Site Allocation can more closely align with draft New London Plan policy which advocates for design-led high-density development. Thus, we suggest that subject to a high quality design, greater than 5-6 storeys could be achieved at Elm Road in this Tall Buildings Area, to maximise the potential of this strategically important site located partially in Wembley Town Centre and with high public transport accessibility (PTAL of 4-6a, due to increase to 5-6a in 2031). The development potential of this area should not be restricted by a maximum height at this stage but considered at planning application stage, taking into account planning benefits and design quality.

Housing Strategy

- LHG note the aspiration of Brent Council to provide minimum 35% affordable housing, and we suggest that in line with other adopted and emerging regional and local policy, that the amount of affordable housing should be the 'maximum reasonable' in the context of viability and other considerations.
- We encourage site specific discussions with the Council to enable the delivery of the most appropriate mix for Elm Road.

Employment and Centres

- LHG supports growth in Wembley Town Centre and opportunities for employment. However, a requirement for onsite affordable workspace should not compromise flexibility of an end user and ability for development to feasibly come forward. Guidance on how financial contribution in lieu of onsite provision is to be calculated should be provided.

Parking

- LHG acknowledges the policy direction towards encouraging sustainable modes of transport. It is considered that in accessible locations, car free development is a good starting point for development.

Part 1: Introduction

We are supportive of the policy messages relating to strategic growth of Brent, set out within the six Good Growth Policies and to be delivered through specific growth opportunities provided by the Growth Areas including Wembley Growth Area which is highlighted in Policy BCGA1. LHG recognise that Brent has an increasingly important role amongst the other London boroughs to deliver London's growth in the most optimal and sustainable way.

We welcome the recognition that there is opportunity for substantial growth within the Growth Areas. It is noted that Brent has a projected baseline scope for 29,150 new homes between 2019/20 to 2028/29 which according to the draft Local Plan is equivalent to one dwelling being built for every four homes that currently exist. Furthermore, it is anticipated that jobs will increase by 0.39% per year. These targets provide a clear foundation on which to target growth, facilitated by sustainable mixed-use development.

Part 2: Good Growth

We welcome the focus of the Wembley Growth Area Policy BCGA1 which seeks to promote Wembley as the place which will drive the economic regeneration of Brent. However, it remains clear that the levels of population growth anticipated by the Mayor are such that the requirement for new homes will remain significant. It is clear therefore that Wembley, which is designated as an Opportunity Area by the GLA and has a minimum requirement for 11,500 new homes, should seek to support this.

Policy BCGA1 should ensure that supporting growth through delivery of new homes in Wembley is included within the policy wording alongside a focus on investment in economic regeneration to meet the regeneration ambitions in this part of Wembley.

We note that the place vision, outlined in Policy B7 'South West' supports continuing residential-led mixed use development within Wembley. This policy supports tall buildings in the Wembley Growth Areas. However, the policy (part b) assumes a height of 15-18 metres (5 or 6 storeys) to be appropriate. The draft Local Plan seeks to focus most of the new housing for the borough in the South West in Wembley. Therefore, to achieve this target it is likely that higher density development to optimise the potential of sites in line with this ambition and wider regional and local policy frameworks will be required.

We therefore suggest that there is scope for flexibility relating to height and density on a site specific basis, and this should also be reflected in the policy wording and the wording within Site Allocation BSWA10 Elm Road ('Elm Road') which holds a strategically important location adjacent to Wembley Town Centre.

Site Allocation BSWA10 'Elm Road'

Elm Road (Figure 1) currently states an indicative capacity of 400 dwellings and height of mid-rise building between 5-6 storeys for buildings beyond the High Road.

Figure 1: Draft Site Allocation BSWA10



We consider that Elm Road could achieve a greater scale and density, subject to townscape assessment and high-quality design, beyond that indicated within the draft Site Allocation. This in turn could offer greater planning benefits and contribution to local community and transport infrastructure.

Housing capacity

We consider that the Site can offer substantial benefits and a 400 dwelling capacity may not maximise the development potential of the Site in accordance with draft Policy Good Growth 'Making The Best Use of Land' which seeks to prioritise development in 'new and more efficiently and intensively developed Growth Areas' (including Wembley).

We consider that circa 1,300 dwellings could be achieved within Elm Road. We have calculated this density based upon the London Plan's density matrix and our assumptions are set out as follows. This would obviously be subject to further discussions with the local authority regarding a site-specific scheme design.

The London Plan density matrix states that accessible central locations (defined as 'areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre') and a PTAL of 4-6a (increasing to 5/6a by 2031) means that an upper density range of 1100 hr/ha can be achieved. Elm Road has an area of 2.98 ha therefore using this indicator, we consider that 3,278 habitable rooms could be achieved. If 2.5 habitable rooms per dwellings is assumed, then this is equal to 1,311 dwellings.

Scale

Where development is of a high quality, high densities and greater scale should not be resisted. Indeed, as a prominent and well-connected location in London, Wembley Town Centre is

arguably one of the most appropriate locations for such development to occur, particularly given Elm Road's location within a Tall Building Area and because draft Local Plan Policy BD2 'Tall Buildings in Brent' suggests opportunity for higher buildings at strategic points in town centres.

Elm Road is strategically located partially in Wembley Town Centre and Wembley Central Train Station and a short walking distance (circa 10 minutes walking) from Wembley Stadium Train Station. In terms of the local economy, Wembley Town Centre is also the most prominent location in terms of employment growth. We therefore consider that the dwelling growth scenario, as is currently envisaged by the baseline assumption for Elm Road in the draft Site Allocation can be exceeded. The Site Allocation for Elm Road in the draft Local Plan should make this clear and set a new target of circa 1,311 homes to accord with the overarching vision of the draft Local Plan.

Trees

Lastly, we promote high quality visual amenity. We note that the Site Allocation for Elm Road requires retention of the existing tree stock of mature trees should be retained. However, it is considered that flexibility should be allowed in terms of retention of trees where this may limit optimisation of the development of Elm Road and delivery of other planning benefits. This flexibility is identified in draft Local Plan policy BG12 'Trees and Woodlands' which recognises that where retention of trees is not possible on-site mitigation through tree planting or financial contribution may be acceptable. It is considered that this should also apply to Elm Road and be made clear within the draft Site Allocation wording.

Part 3: Opportunities for Good Growth

Housing Strategy

We support the delivery of high-quality housing for the local community. We also note the identification of a minimum target for 35% of these homes to be affordable (at paragraph 6.2.46), in keeping with the aspirations of the Mayor of London. However, to ensure consistency with national policy, the draft Local Plan Policy BH5 'Affordable Housing' should make clear that the percentage arriving from development proposals and financial contributions for developments of between 5-9 dwellings will be the 'maximum reasonable' in the context of viability and other considerations.

Delivery of new homes should not be delayed by unrealistic or inappropriate demands for affordable housing in the context of individual site viability.

It is also noted that the Council will seek maximum provision of social rented units (70%), although the Council recognises the difficulty in delivering these units. Thus, it is considered that the 70/30 split of social rented to shared ownership should be subject to financial viability assessment.

We acknowledge that in terms of housing mixes, the draft Local Plan notes that family housing (25% total provision is sought) may be more appropriate in certain locations or for certain characteristics of a development. We encourage site specific discussions with the Council to enable the delivery of the most appropriate mix for Elm Road.

Centres and Employment

We acknowledge the important urban spatial role Wembley Town centre must play as the largest retail centre in the borough. Redevelopment of the Elm Road site for mixed use development can positively and sustainably contribute to growth of the Town Centre Status and aspirations of the Council for a step change towards 'International' town centre status.

We support economic growth in the borough. However, we also consider that within Policy BE1 'Economic Growth and Employment Opportunities for All' the requirement for 10% total floorspace in major development exceeding 3,000 sqm in the Wembley Growth Area should not compromise the ability for development to come forward in terms of financial viability and flexibility for end users.

We note that in paragraph 6.4.13 that the Council will consider financial contributions in certain circumstances, for instance where a single large unit may be proposed, and we support this approach to encourage flexibility for commercial end users. Guidance on how this financial contribution will be calculated would be welcome.

Part 4: Supporting Growth with Infrastructure

Transport

We acknowledge Appendix 4 of the draft Local Plan which adheres with draft New London Plan policy T6.1 residential car parking standards. Given the high accessibility of the site at Elm Road, we consider that car free parking as a starting point for development could be suitable.

Part 5: Urban Design

High Quality Design

As already stated in this letter, we consider high quality development to be a key part of delivering optimal development. We are supportive of draft Policy BD1 'Leading the Way in Good Urban Design'. However, we consider that high quality design which is visually interesting and enhances local character can be conducive with taller buildings.

Tall Buildings

Whilst we acknowledge draft Policy BD2 'Tall Buildings in Brent' we consider that there is an opportunity, particularly in the Growth Areas of Brent, to increase density on sites such as Elm Road to deliver planning benefits including affordable housing, affordable workspace, and public realm whilst enhancing the local character and nearby heritage assets through carefully designed architecture.

Indeed, the draft New London Plan advocates for design led high density development which optimises land, including where sites are accessible, are subject to infrastructure improvements, and are in a suitable context for intensification. With high public transport accessibility (4-6a increasing to 5-6a in 2031) and a strategic location at the heart of Wembley partially located in the Town Centre, it is considered that draft Policy BD2 should not limit sites such as Elm Road in meeting their development potential to meet Local Plan objectives.

Next Steps

We trust these representations are clear and we would be pleased to clarify or provide further information on any element as appropriate. We would likewise welcome a broader dialogue

with officers to ensure that the potential for Brent and Site Allocation BSWA10 Elm Road is captured in the new Local Plan.

We would be grateful for confirmation of receipt of these representations and look forward to some suggested dates to meet in person in order to build upon the content contained within them.

Please do not hesitate to contact us on the details at the head of this letter should you require any further