

Submitted to Local Plan Reg 19

Submitted on 2019-12-05 16:59:49

1 What is your name? Alun Evans

**Themes**

**47 Which theme would you like to comment on? (you will get the opportunity to select additional themes to comment on throughout the survey)**

**Please select a theme::**

Economy and Town Centres

**Economy and Town Centres**

**68 Policy BE1 (Economic Growth and Employment Opportunities for All):**

**Agreement matrix BE1 - How strongly do you agree/disagree with this policy?:**

Strongly disagree

Is not Justified, Is not Consistent with national/regional policy

**For those which have been checked, please state your reasons::**

Draft Local Plan Policy BE1 states:

The Granville multi-purpose workspace and community space in South Kilburn Growth Area will be protected and opportunities to provide additional affordable workspace will be sought. In Alperton, Burnt Oak Colindale, Church End, Neasden, Staples Corner and Wembley Growth Areas a minimum of 10% of total floorspace within major developments exceeding 3000 sq.m. is to be affordable workspace in the B use class.

The current drafting of Policy BE1 reads to relate to any major development of over 3,000 sqm, regardless of proposed use class. However the current drafting of Policy BE1 could have detrimental impacts in relation to viability and deliverability on any major development in Brent, specifically Growth Areas such as Wembley, where business space is not proposed as part of the development. Therefore, it is queried whether the draft Policy is intended to relate to major developments of over 3,000 sqm business (B Class uses) floorspace, rather than any major development over 3,000 sqm floorspace. As drafted, the policy is not consistent with the NPPF as the requirement for 10% of \*total\* floorspace within major development to be affordable workspace prejudices delivery of housing and other key land uses.

**69 Policy BE2 (Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS):**

**Agreement matrix BE2 - How strongly do you agree/disagree with this policy?:**

**For those which have been checked, please state your reasons::**

**70 Policy BE3 (Local Employment Sites and Work-Live):**

**Agreement matrix BE3 - How strongly do you agree/disagree with this policy?:**

Strongly disagree

Is not Justified, Is not Consistent with national/regional policy

**For those which have been checked, please state your reasons::**

Draft Local Plan Policy BE3 related to non-designated Local Employment Sites within Brent and states the following:

The council will allow the release of Local Employment Sites to non-employment uses where: a) continued wholly employment use is unviable; or b) development increases the amount of affordable workspace in the B use class, with makerspace in use class B1(c) prioritised to meet demand. Work-Live units will be acceptable where they are managed by an organisation committed to their use primarily for employment, as evidenced by a management plan. Loss of Work-Live units to residential will be resisted.

However, supporting paragraph 6.4.23 sets more prescriptive criteria for Local Employment Sites that seek to meet part b of Policy BE3, as follows “in exceptional circumstances a mixed-use development incorporating non-employment uses may be appropriate. The applicant must demonstrate that redevelopment will result in: a) the accommodation of the existing employment use, or all workspace is provided as affordable workspace to meet development needs of businesses in Brent, particularly SMEs; b) an increase in the amount of employment floorspace on the site in the B use class; c) delivery of wider regeneration benefits to the community; and d) employment floorspace with a very strong prospect of being occupied”.

It is considered that the Policy BE3 and the above supporting text under paragraph 6.4.23 should be amended to exclude development coming forward within Growth Areas, such as Wembley, as the prescriptive criteria could prevent development by prejudicing viability and deliverability of redevelopment proposals which are residential or commercial-focused and which would comply with other policies in the plan.

The policy as drafted is therefore unsound as it does not reflect the NPPF in terms of meeting various development delivery objectives including delivery of housing and other commercial uses.

**77 Would you like to comment on another theme?**

Not Answered

**Fair Processing Statement**

**101 Would you like for your personal data to be used for reasons other than identifying your representation and for contact in relation to this?**

No