

Policy Team
Brent Civic Centre
Engineer's Way
Wembley
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Sent by email: planningstrategy@brent.gov.uk

Date: 5 December 2019
Our ref: 61391/01/SSL/SFU/

Dear Sir/ Madam

**LB Brent Local Plan Regulation 19 Consultation (October – December 2019):
Representations on behalf of Woolbro Homes**

On behalf of our client, Woolbro Homes ('Woolbro'), please find enclosed representations to the LB Brent Regulation 19 Local Plan, published for comment until Thursday 5 December 2019.

Lichfields act for Woolbro Homes in relation to its site at 100 Beresford Avenue which is identified as part of the wider Site Allocation Policy BSWSA6 'Beresford Avenue' for '*mixed-use residential-led development incorporating employment uses*'. We are instructed to submit these representations to the consultation document, limited in scope to cover BSWSA6 and other area-based policies relevant to this site allocation.

Woolbro Homes strongly supports the Council's intention to allocate the site and generally supports the Council's approach in relation to the site, and in this context, provides representations on details of the following policies:

- 1 BSWSA6 – Beresford Avenue;
- 2 BSWG1 – Alperton Growth Area;
- 3 BP7 - South West; and,
- 4 BH1 - Increasing Housing Supply in Brent.

We trust that these representations are clear and will assist the Council with the preparation and adoption of a sound plan for LB Brent in the near future. Please do not hesitate to contact me or my colleague, Stephanie Walker should you wish to discuss our comments or Woolbro's position. We should be grateful if you would confirm receipt of these representations and keep us informed of the progress of the emerging Plan.

Survey:

What is your name? Sally Furminger

What is your organisation (if applicable)? Lichfields

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

Policy: Paragraph: Table: Map:

2. Do you consider the Plan is:

Legally compliant? Yes: No:

Sound? Yes: No:

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

Positively prepared

Justified

Effective

Consistent with national policy

4. Please give reasons for your objection or support:

Woobro Homes strongly supports the Council's continued intention to allocate land at Beresford Avenue, Alperton for '*mixed-use residential-led development incorporating employment uses*'. Woolbro Homes owns the 0.34 Ha site at 100 Beresford Avenue (the eastern part of the allocation), which comprises 0.34 ha and currently contains a two-storey warehouse (B2 or B8 use class).

Allocation BSWSA6 will assist the Council to meet its wider plans for the regeneration of Alperton. The allocation would continue development which has come forward on neighbouring sites and in the immediate area (including Northfields to the east), contributing to meeting Brent's housing needs within the designated Alperton Growth Area.

The allocation is in accordance with NPPF principles for achieving sustainable development, including provision of homes to meet development needs, making effective

use of land (i.e. previously developed land) and minimising impact on climate change due to the site's accessible location well served by public transport (NPPF, 2019, Para 8).

Whilst Woolbro supports the principle of BSWSA6, it has reservations regarding some of the details within the site-specific allocation, these relate to (1) Density (2) Height and (3) employment floor space requirement.

1. Density

The allocation indicates an indicative capacity of 135 units for the (0.96 Ha) allocation (140 dbh), this is an increase in density from the corresponding allocation in the adopted local plan (SSA7) for 100 units on 1.7Ha (59 dph).

Whilst Woolbro Homes supports this identified increase in density, it considers the allocation could deliver a higher density than stated, noting the approach taken on approved, nearby developments:

- Afrex House (18/0752 approved February 2018) – 150 dwellings / ha
- Abbey Wharf (16/4478 approved December 2016) - 178 dwellings / ha
- Northfields (18/0321 approved September 2018) - 317 dwellings /ha
- Alperton House (18/4199, approved June 2019) – 515 dwellings/ ha

Officer Reports considered the above sites to be 'urban' under London Plan Policy 3.5 and assessed the proposed density to be acceptable, being in keeping with both emerging developments in the wider allocation and the Alperton Growth area.

The Alperton Masterplan SPD (2011) sets out a vision for the redevelopment of Alperton Growth Area. It is understood that Cabinet has resolved to revoke the masterplan as an SPD (14 October 2019). The cabinet report for the Local Plan sets out that whilst the document has been helpful in terms of setting out a vision and place-making strategy for the growth area:

"... in terms of built form, the document in particular in terms of scale and density has modest ambitions. In the context of draft London Plan housing targets, current and draft London Plan design policy and planning permissions delivered more recently, it is evident that as a material consideration the guidance is becoming less relevant to current day decision making. (paragraphs 3.29 – 3.32).

The Cabinet report notes that moving forward, the emerging Local Plan seeks a greater scale of development capacity on allocated sites than has previously been identified. Draft policy BSWSA6 should therefore consider facilitating many more additional dwellings, compared to the position supported in policy SSA7. Draft policy BSWSA6 must ensure it is effective and responds to this emerging planning context so that LB Brent's aspirations and development needs are both optimised and delivered.

Draft London Plan Policy D1B is also clear that all development must make the best use of land and seek to optimise site capacity through a design-led approach in terms of its form and layout, experience, quality and character. The Panel (October 2019) supported this approach and noted assessment of density should be made on an individual site basis.

In addition, the NPPF states that planning policies and decisions should promote effective use of land, including meeting the need for homes: *"Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land"*.

To ensure the plan is positively prepared and also consistent with national policy, LB Brent should be seeking to maximise the contribution this sustainable brownfield site can make to meeting the borough's housing needs.

2. Height

Related to this, under 'design principles', the allocation states: *'development coming forward should be denser than the surrounding suburban character and is suitable [for] tall buildings of mid-rise height (potentially around 6 storeys), subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing being delivered...'*

Whilst Woolbro Homes supports the principle of seeking comparatively higher density on this land (see above), as well as the statement's specific reference to tall buildings of mid-rise height, Woolbro objects to the restriction of buildings to *'potentially around 6 storeys'*. SSA7 does not specify height for the allocation.

The LB Brent Alperton Masterplan seeks a scale of new development in this location which *'relates to existing neighbourhoods to the north and south, with taller buildings making the transition into a different scale in the Northfield estate'*. The Northfields development abuts this allocation to the east which has approval for up to 14 storeys on the site. In addition, The LB Brent Design Guide specifically refers to extensive areas of larger scale planned regeneration (including parts of the Alperton masterplan) where *'a new urban character can be created'* whilst also drawing on existing context, character and townscape (page 4). We now understand that LB Brent has enhanced aspirations for the growth area in particular in terms of scale and density since adoption of the SPD (see above).

It follows that Woolbro Homes seeks removal of the specific reference to restricting redevelopment to a certain number of storeys within the allocation, assessment of height and density should be design-led and made on a site by site basis. This amendment would increase consistency with the new London Plan approach to density/design (see above) as well as LB Brent Guidance and enable greater flexibility so that the policy can be more effective and deliverable over the plan period.

3. Employment Floor Space

Under 'Planning considerations' the allocation states *"given the site is existing employment land and Brent's status as a provide capacity borough, no net loss and re-provision of employment floor space along the ground floors of the new buildings will be required"*

This is a reference to the draft London plan which identifies LB Brent to be a 'provide capacity' borough *"where strategic demand for industrial, logistics and related uses is anticipated to be the strongest"*. Such Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new (accessible) locations (*para 6.4.6, supporting Text Policy E3*).

Draft NLP Policy E4 sets out that any net release of industrial land (in order to manage issues of long-term vacancy and achieve wider planning objections), should be facilitated through the processes of industrial intensification, co-location and substitution. Release should also be focused, including in locations that are (or planned to) *"contribute to other planning priorities including housing (and particularly affordable housing)"*

Notwithstanding, the land in the allocation is a non-designated employment site and is not designated as a SIL or LSIS. Further, Alperton is allocated as a Housing Zone (GLA 2015), with the aspiration of providing over 2,000 new homes by 2021, supporting the intensification of housing provision within the zone. LB Brent Core Strategy (2010) identifies Alperton as a Growth Area, including being suitable for at least 1,600 homes. Draft Policy BSWGA1 (see below) indicates delivery of 6,000 homes in the growth area.

In addition, the Alperton Masterplan identifies the Council's intention for land adjoining the canal in Alperton (including current allocation SSA7) as *"a growth area suitable for the construction of new homes..."* the council wish to transform the existing industrial area

"...into a new, mostly residential neighbourhood" (page 4).

In this context, Woolbro Homes consider that instead of requiring 'no net loss' of employment land in the allocation, reference should instead be made to re-provision of employment use at ground floor level, the quantum of that to be provided should follow assessment of the proposed development scheme as a whole.

This amendment would respect LB Brent's status as a 'provide capacity' borough as well as assist in achieving the Borough's stated intention to create a mostly residential neighbourhood in this canal side location on land which has been consistently identified by both the GLA and LB Brent to be a sustainable location for the provision of new homes.

As written, this reference within the allocation does not appear to be justified in terms of meeting existing stated development goals and evidence in this location and risks limiting the scope for the site to contribute to meeting the Borough's housing numbers (i.e. not positively prepared).

Suggested amendments to BSWSA6 are clearly set out as requested below.

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

Woolbro consider the following changes are required to make the plan sound (additions underlined, deletions ~~striketrough~~):

Indicative Capacity

~~435~~ Around 150-200

Time frame for Delivery

0-5 Years: ~~435~~ c.150- 200

Planning considerations:

“...Given that the site is existing employment land and Brent’s status as a provide capacity borough, ~~no net loss and~~ re-provision of employment floor space along the ground floors of the new buildings will be sought required. The quantum to be provided should be based on site specific assessment of proposed development schemes as a whole...”

Design Principles:

“Development coming forward should be denser than the surrounding suburban character and is suitable tall buildings of a mid-rise height (~~potentially around 6 storeys~~), subject to detailed design analysis showing no adverse impacts and a satisfactory relationship in terms of scale and massing being delivered with the surrounding two storey residential properties that are likely to remain on Beresford Avenue.”

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:

This is an important site for the delivery of housing and, while Woolbro support the allocation in principle, there are a number of important matters that need to be addressed to ensure that development on the site will be optimised and delivered.

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.

Survey:

What is your name? Sally Furminger

What is your organisation (if applicable)? Lichfields

8. Which part of the Plan are you commenting on?

Policy: Paragraph: Table: Map:

9. Do you consider the Plan is:

Legally compliant? Yes: No:

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

Positively prepared

Justified

Effective

Consistent with national policy

11. Please give reasons for your objection or support:

Woolbro Homes strongly supports Policy BSWGA1 (Alperton Growth Area) which seeks transformation as an extensive area of mixed-use residential-led regeneration. In particular, Woolbro supports the Council's intention to focus this regeneration along Grand Union canal and to provide over 6,000 new homes. Alperton provides a highly sustainable location for the delivery of this new community with access to both Alperton and Stonebridge Park underground and rail station.

A number of sustainable developments have already been approved along the canal in accordance with this growth policy, maintaining this policy in the new local plan will enable the continued redevelopment of Alperton to assist with meeting the Council's housing and wider regeneration needs.

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

N/A.

13. 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

X

Yes, I wish to participate at the oral examination

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

N/A.

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

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15. Which part of the Plan are you commenting on?

Policy: Paragraph: Table: Map:

16. Do you consider the Plan is:

Legally compliant? Yes: No:

Sound? Yes: No:

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

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18. Please give reasons for your objection or support:

Woolbro supports the part of policy BP7 which seeks to continue residential-led mixed-use development as well as locate taller buildings within the Growth Areas, including Alperton. Woolbro also support the intention to prioritise public transport use and associated improvements in the Alperton Growth Area (Transport part 'S'), in line with sustainable development principles.

Woolbro challenge part 'e – homes'. Here, in relation to the Alperton Growth Area, the policy states:

“Where alternative uses are co-located on industrial sites this will be as part of a comprehensive regeneration scheme which ensures no net loss of industrial floorspace.”

For the reasons set out above to site specific allocation BSWSA6, Woolbro consider reference to 'no net loss' should be amended on the basis that it does not appear to be justified in terms of meeting wider existing stated development goals in this Housing Growth Zone.

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

Woolbro consider the following changes are required to BP7 to make the plan sound (additions underlined, deletions strikethrough):

“ e) Co-locating residential uses on areas of industrial and employment land within the Alperton Growth Area, taking advantage of areas well-served by public transport. Where alternative uses are co-located on industrial sites this will be as part of a comprehensive regeneration scheme which ensures ~~no net loss~~ re-provision of industrial within the ground floors of the new buildings.”

20. 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

X

Yes, I wish to participate at the oral examination

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

N/A.

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

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What is your organisation (if applicable)? Lichfields

22. Which part of the Plan are you commenting on?

Policy: Paragraph: Table: Map:

23. Do you consider the Plan is:

Legally compliant? Yes: No:
Sound? Yes: No:

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

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25. Please give reasons for your objection or support:

Woolbro Homes support LB Brent's intention to maximise the opportunities to provide additional homes in the period 2041 and beyond, in particular the Council's strategy to focus development towards the growth areas and site allocations (such as Alperton and BSWSA6).

This strategy will assist with achieving sustainable development, through focussing development in a sustainable location as well as maximising effective use of previously developed land (NPPF 2019, para. 8).

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

N/A.

27. 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

X

Yes, I wish to participate at the oral examination

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

N/A.

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

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