

**Our ref:** Q100004/JB

**Your ref:**



Policy Team  
Brent Council  
Brent Civic Centre  
Engineer's Way  
Wembley  
HA9 0FJ

By email

Dear Sir/Madam

## **Brent Draft Local Plan – Representations to Regulation 19 Consultation (Publication Draft)**

On behalf of my client, *IKEA Properties Investments Limited* ('IKEA'), I enclose representations to Brent Council's draft Local Plan – Publication Draft (Regulation 19 Consultation) ("the Draft Plan"). These representations build upon previous comments made by Quod to the Regulation 18 Local Plan consultation in January 2019.

These representations concern IKEA's existing Wembley store ("the Site") and its allocation in the Draft Plan. Specifically they address the following:

- The inclusion of the Site within an area designated as Strategic Industrial Land (SIL) is unjustified. The Site makes no contribution towards London's existing or future industrial capacity and it should be removed from the SIL designation; and
- The Site's established retail (A1) and office use should be recognised. Given the strategic objectives of the NPPF and the Draft Plan, a site-specific allocation would be appropriate to reflect this established position and ensure that the future development potential of the Site can be maximised. The Council have already recognised similar positions in their allocation of other sites for Mixed-Use across the Borough.

Consequently, we object to the inclusion of the Site within the Wembley SIL and specifically Policy BE2 of the Draft Plan. As currently proposed this designation and Policy are not justified, effective, positively prepared or consistent with national policy. Accordingly, the Draft Plan is not '*sound*' in its current form.

The changes we suggest below will ensure that the Draft Plan is based upon the most appropriate strategy, and that it is therefore '*sound*' in accordance with the NPPF.

### **1 Site Description**

The Site is approximately 5.6ha and includes the IKEA store, adjoining multi-storey car park and additional surface-level car parking. The IKEA store is trading in retail (A1) use.



The IKEA store has been operational since 1988 and was the second store to open in the UK. It also provides IKEA’s UK Head Office alongside the store itself. The Site is one of the Companies most successful in the UK, and currently employs c. 700 people in the store and c. 350 in IKEA’s Head Office. It performs an important economic and social role in the local (and wider) community, in meeting shopping needs and being a key employer in this part of North West London.

Land to the south and west is predominantly residential in character including the areas of Tokyngton, Stonebridge and Church End/Roundwood. A Tesco supermarket lies to the east of the Site, again in retail (A1) use and beyond which are a number of industrial units. A small number of industrial units are also located to the immediate north-west of the Site.

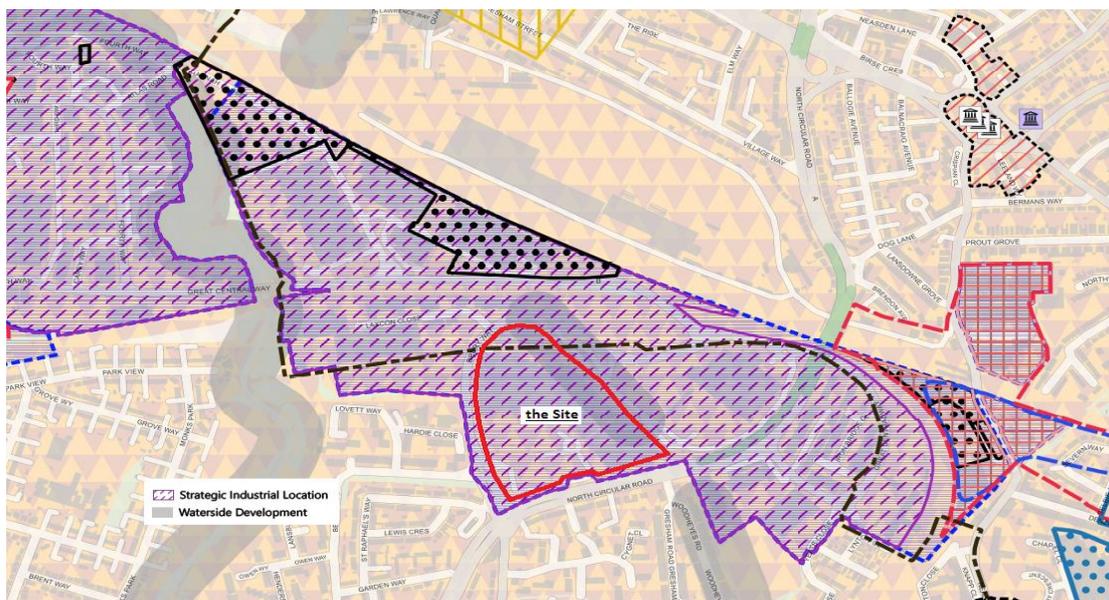
The Tesco site is subject to a pending planning application for additional (non-industrial) development (ref. 19/1363). It is pertinent to consider the determination of this application further as it has a material bearing upon the enclosed representations. This is considered further in Section 3 below.

The existing London Underground railway forms a definitive physical boundary to the north of the Site, running in a broadly east-west direction. This line includes Neasden station which is c. 700m to the east. Stonebridge Park station is c. 1.5km to the south, which provides access to both London Underground and Overground services. The Site has a public transport accessibility rating (PTAL) of 2/3.

## 2 Site Designations & Relevant Planning Policy

The Site lies within the ‘south’ sub-area of the Draft Plan (called the South ‘Place’) and forms part of the wider ‘Wembley SIL’ allocation. It is positioned within the south of the SIL and is a peripheral location in this regard. **Figure 1** includes an extract of the Proposals Map to the Draft Plan, annotated to show the Site:

Figure 1: the Site & Wembley Strategic Industrial Location (SIL) Location



The existing (2016) and emerging (2019) London Plans note that the purpose of identifying land as SIL is in recognition of its suitability, as well as to protect it for a range of general industrial uses only. Aside from a limited range of supporting uses<sup>1</sup>, they seek to limit any non-industrial development in SIL designations.

Areas designated as SIL are identified as the main sources for meeting London's industrial capacity. The emerging London Plan does not define the extent of SIL boundaries however, and confirms that local planning authorities should define the detailed boundaries themselves through their Local Plan process:

*“Boroughs, in their Development Plans, should: (1) define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution” (Draft London Plan Policy E5).*

This approach is also reflected in the currently London Plan (2016)<sup>2</sup> and the Mayor's Supplementary Planning Guidance (SPG) entitled 'Land for Industry and Transport'<sup>3</sup>.

The Draft Plan therefore seeks to define the extent of the Wembley SIL boundary and the Council have the jurisdiction to define its boundary, but only where it is necessary and justified.

Draft Policy BE2 seeks to protect the Wembley SIL for “solely employment uses within use class B1c, B2 and B8 and closely related sui generis uses”. Clearly, however, the Site is not in industrial use and there is no intention of IKEA to develop the site for industrial purposes during the plan period of the Draft Plan.

As such, it is not appropriate to protect it for these uses given that it is not currently, nor will it in the future, operate as such. Indeed, designating the Site as part of SIL will have no bearing upon the Council's industrial land capacity and would only serve to restrict its potential future development unnecessarily.

### **3 Proposed Development at Tesco, Great Central Way (ref. 19/1363)**

Immediately adjacent of the Site to its east is an existing Tesco store that also lies within the Wembley SIL. This land is subject to a pending planning application (ref. 19/1363) to provide additional non-industrial development within the site – specifically a two-storey building totalling c. 4,000sqm of A1/A3/D2 use, and the internal subdivision of the Tesco store to incorporate an additional retail (A1) unit of c. 1,500sqm.

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<sup>1</sup> Where such uses form part of a strategically co-ordinated process of SIL consolidation, they provide employment workspace to meet the need of small and medium sized enterprises, or they are for small scale 'walk to' services for industrial occupiers (i.e. creches, cafes) (Policy 2.17). In addition, draft Policy E5 allows aggregates and industrial-related research and development uses.

<sup>2</sup> Paragraph 2.83 of the adopted London Plan (2016).

<sup>3</sup> The Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG) also confirms that the detailed boundaries of SIL's are to be confirmed by local planning authorities in Development Plan Documents (Figure 2.1, P23).

Brent Council are yet to determine the planning application, and there was further technical information submitted in November 2019 relating to transport and air quality. It is pertinent to note, however, that the GLA issued their Stage 1 Report on 24 June 2019<sup>4</sup> which considered the principle of non-industrial development within the Wembley SIL.

Specific to these representations, it is noted within the Stage 1 Report that:

- The GLA acknowledge that whilst the Site is within a SIL, it is not currently used for industrial purposes (Para. 21).
- The GLA accepted that nearby SIL, which is in low-density industrial use, could be reasonably intensified as part of a comprehensive development (Para. 21).
- Subject to addressing the retail impact requirements of the NPPF, the principle of non-industrial use on an established retail site within SIL is acceptable (Para. 21).
- The Applicant would need to work with IKEA and Brent Council to develop a comprehensive masterplan for the wider site (Para. 22).

The GLA have therefore accepted and recognised that non-industrial land (specifically retail) within SIL is appropriate for non-industrial development. This is a significant and pertinent point that must be borne in mind when considering these representations.

## 4 Representations

### Representation 1 – Removal of the Site from the Wembley SIL

These representations seek the removal of the SIL designation across the Site because it is not justified, nor appropriate, to include a major retail use within a SIL.

This removal is justified on the following basis:

- The Council's evidence within their '*Employment Land Demand Study*' (2015) seeks protection of the Wembley SIL to ensure that there is a sufficient capacity to meet project demand for industrial land.
- The Site is currently in non-industrial use, being an established retail (A1) destination with additional office use - it makes no contribution presently to the City's industrial land supply.
- The Site will not be developed for industrial purposes in the future, and it therefore performs no role in meeting London's future industrial capacity.
- It is therefore not justified as SIL land and does not contribute to the SIL allocation, or the purposes of including land within it.

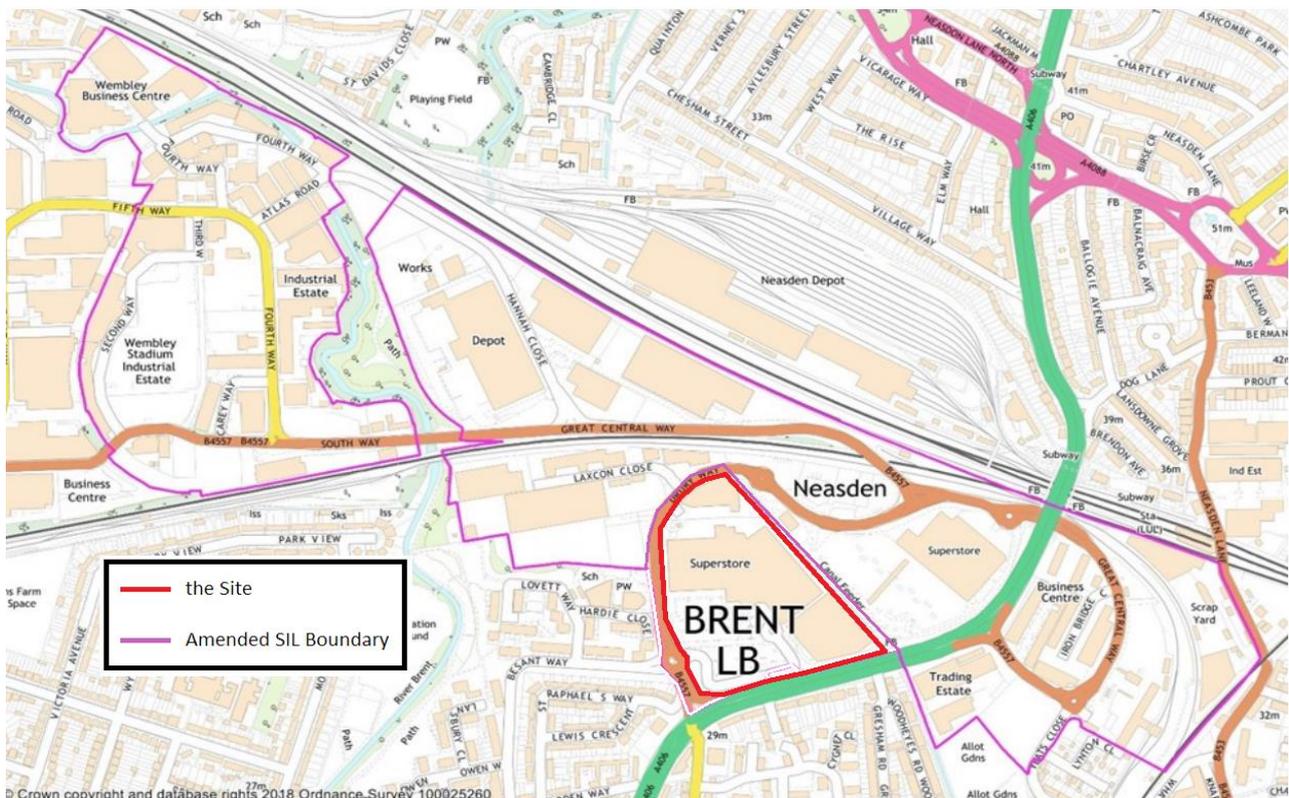
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<sup>4</sup> GLA Planning Report reference GLA/4981/01, 24 June 2019.

- The Site is located in a peripheral location in the currently proposed (draft) SIL boundary, and is not integral to the overall SIL function. Its removal would not prejudice the purpose of the SIL.
- The Site is already a significant generator of employment of over 1,000 people and provides IKEA’s UK head office alongside the retail store. This established use and role should not be undermined by an unjustified SIL designation.
- The Council have not justified the inclusion of the Site in the SIL designation as part of their emerging local plan process. Indeed, their evidence base supporting the Draft Plan acknowledges that this particular part of the SIL is “dominated by large format retail uses”<sup>5</sup> (i.e. non-industrial uses).
- The GLA have accepted that non-industrial uses are entirely appropriate on SIL land in this area, where that land makes no industrial contribution at present (i.e. Tesco).

As currently proposed, the SIL boundary (and indeed the Draft Plan) is not justified or effective. The Site should therefore be removed from the SIL designation, and the SIL boundary amended, as per **Figure 2**.

Figure 2: Proposed SIL Amended Boundary (south sub-area)



<sup>5</sup> Brent Employment Land Site Analysis (November 2018), P76.

## Representation 2 – Recognition of the Site’s Established Use and its Potential Future Development Intensification

The Site is an established retail (A1) and office location yet there is no recognition of this within the Draft Plan at present. This use is unlikely to change during the plan period and it should be accurately recognised as such within the Draft Plan.

Furthermore, the Site has the potential for future development intensification and the delivery of a mix of uses alongside IKEA’s operations. The Draft Plan should reflect this potential – indeed, the Council’s evidence base in their SIL site assessments recognises the future potential of the Site for other uses (see below).

Furthermore, the GLA have recognised the importance of the Site being considered alongside the adjoining Tesco site as part of a comprehensive masterplan that would achieve an intensification of industrial land elsewhere within the Wembley SIL, and allow these non-industrial sites to be redeveloped for non-industrial uses.

Accordingly, a bespoke allocation should be afforded to the Site that recognises its existing retail and office uses and their likely retention as such throughout the plan period, whilst also being permissive of its potential mixed-use development intensification in the future. Such uses could include, but not be limited to, housing and other commercial uses within the B Use Class.

The Council have already proposed several bespoke allocations in the Draft Plan, and applying this approach to the Site would be in accordance with the NPPF and Council’s strategic objectives. Section 4 of the Draft Plan outlines these strategic objectives, which include:

- Delivering strong and inclusive communities;
- Making the best use of land, supporting higher density development where appropriate;
- Growing a good economy, making a better use of Brent’s employment land through its intensification and, where possible, supporting additional housing and community facilities through co-location;
- Delivering the homes to meet Brent’s needs; and
- Increasing efficiency and resilience.

Draft Policy BE2 does allow for the co-location of residential uses in certain SIL’s, albeit this does not extend to include the Site at present. To inform this approach, the Council undertook an assessment of the entire Wembley SIL that concluded that, in its entirety, it could be considered a sustainable location for housing and there are opportunities for intensification, including through:

*“...intensification through co-location on land to the east which is currently occupied by retail uses. This could help to increase employment densities and bring benefits for the wider community by improving connectivity between the surrounding community and adjoining growth areas” (Brent Employment Site Analysis, November 2018, P79).*

On balance the SIL as a whole was not deemed appropriate for residential use at the current time due to its PTAL rating (much of which is lower/worse than the Site itself), and the presence of uses that could affect residential use through noise, odour and air quality. There is a clear recognition within the Council's evidence, however, that the Site and adjoining Tesco areas have the potential for development intensification in the future.

More recent evidence underpinning the Draft Plan, contained within the '*West London Employment Land Study*' (July 2019), also recognises the Wembley SIL as a potential area for co-location (Table 79).

Taking the Site in isolation, it does not share the same characteristics of the other parts of the Wembley SIL designation. It is on the edge of the wider commercial area that makes up the draft designation, with existing residential areas to its south and west. It has high accessibility credentials being accessible to local public transport nodes and the strategic highway network.

The Draft Plan already allocates a range of "*Key Site Allocations*" across all sub-areas for bespoke forms of redevelopment, including at other existing retail sites. These allocations note that maximising and intensifying their development potential can deliver sustainable benefits whilst meeting the economic, social and housing needs of the Borough.

The Site is appropriate for, and could consequently be allocated for a range of possible residential and commercial uses, alongside retaining the existing IKEA presence, for the following reasons:

- The Site is already an established retail (A1) and office destination;
- The Site is immediately adjacent to existing residential communities, to its south and west;
- It is located in an accessible and sustainable location, with strong public transport links;
- A mix of uses could promote a more effective use of the Site, meeting the need for homes and other commercial uses (NPPF Para. 117);
- It is a previously developed, brownfield location which is encouraged for redevelopment;
- Intensification of development of the Site would contribute towards the Draft Plan's strategic objectives, specifically creating strong and inclusive communities, making the best use of land, whilst potentially delivering the homes to meet Brent's needs;
- The NPPF requires planning policies to make an efficient use of land including, where appropriate, building at higher densities (NPPF Para. 122-123);
- The NPPF requires planning policies to ensure that they optimise the development potential of a site to accommodate and sustain an appropriate amount, and mix, of development; and
- The NPPF requires that planning policies promote social interaction, and this can be achieved through the promotion of a mix of uses in a single location.

In addition to the above, draft London Plan Policy E7 does allow for selected parts of SILs to be consolidated which can, in turn, facilitate the release of some land for a mix of uses including residential. As a minimum,

this approach must ensure “*no overall net loss*” in industrial floorspace capacity. The Site is not currently in industrial use, and there would clearly be no net loss in industrial floorspace capacity arising from an intensification of development.

## 5 Summary

These representations are made on behalf of IKEA in regards to Brent Council’s draft Preferred Options Local Plan.

The Draft Plan proposes to include the IKEA store within the Wembley Strategic Industrial Location (SIL), which extends northwards from the Site. The emerging London Plan notes that whilst this general area of Wembley is appropriate for SIL designation, it delegates the role of defining the specific SIL boundary to Brent, through their Local Plan. Its designation must, however, be justified and based on sound planning grounds.

The IKEA store serves no purpose for meeting London’s current or future industrial capacity, and including the Site within the SIL would undermine its existing retail and employment function. Its inclusion within the SIL boundary is clearly unjustified and illogical, and the Site should be removed. In doing so, the established retail and office use of the Site should also be recognised by the Draft Plan.

The GLA have also recognised that non-industrial development, on non-industrial sites within the Wembley Site, is entirely appropriate in principle.

Both the NPPF and strategic objectives of the Draft Plan seek to maximise the development potential of previously developed sites, and the Site’s potential for development intensification for a mix of uses should also be recognised via a site-specific allocation. The Draft Plan already allows for such allocations across the Borough.

The above changes will ensure that the Draft Plan is based upon the most appropriate strategy for future development, and that it is ‘*sound*’ in accordance with Paragraph 35 of the NPPF, namely that it is positively prepared, justified, effect and consistent with national policy.

I look forward to receiving confirmation of receipt of these representations, and I would welcome the opportunity to discuss their contents further with the Council following the closure of the consultation period.

As confirmed on the enclosed and accompanying Representation Form, we wish to participate at the oral part of the Examination in Public.

Should you require any further information in the meantime, please do not hesitate to contact me.