

Matter 6 Hearing Statement.

Prepared on behalf of Braeside Properties Ltd

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1. Introduction

- 1.1.1.1 This Hearing Statement has been prepared by Knight Frank on behalf of Braeside Properties Limited (landowners of Atlantic House (43-45 Alperton Lane) & Sage Brent (45-47 Alperton Lane)) in response to 'Matter 6' of the Inspectors' Matters, Issues and Questions ('MIQs') for the London Borough of Brent's ('LBB') Local Plan Examination. Matter 6 specifically relates to the economy and town centres.
- 1.1.1.2 43-47 Alperton Lane ('the site') has been included within the Alperton South Locally Significant Industrial Site ('LSIS') in the policy maps that accompany the Local Plan, however it should be noted that under the existing planning policy base, the site in question does not form part of the Alperton South LSIS.
- 1.1.1.3 This Hearing Statement responds to the economy-based questions within Matter 6 and relates to whether the policies contained within the Local Plan, in relation to employment needs, are justified, deliverable and consistent with national policy.
- 1.1.1.4 This Hearing Statement builds upon, and should be read alongside, our previous representations to the Regulation 19 stage of LBB's Local Plan process. Our previous representations are listed under item '9' of the 'Regulation 19 Representations' listed on LBB's 'Submission Documents for Examination' page.
- 1.1.1.5 This Hearing Statement provides a detailed response to several questions within Matter 6, however – in short – it is the landowner's contention that Policy BE2 (and the associated Policies Map) is unsound and that:
- The inclusion of 43-47 Alperton Lane within the Alperton South LSIS and the restriction of development at the site to industrial-related activities is neither evidence-based, justified, or deliverable;
 - The requirements of Policy BE2 are incorrect, subsequently making the policy approach unsound; and
 - The site has the potential to contribute to increased residential and economic development in the Borough, and that the Plan-making approach being pursued by the Council in respect of this site is not appropriate and will only serve to impede and discourage future investment and delivery.
- 1.1.1.6 The landowner does not dispute the importance of intensifying existing LSIS designations in order to achieve the Draft London Plan's desired floorspace-to-site-area ratio of 0.65. However, it is considered that the intensification of existing LSIS (and indeed SIL) should be emphasised first before seeking to extend boundaries. The evidence base is unclear as to what extent intensification within existing LSIS / SIL boundaries meets the required need, taking into consideration all factors (including the implications of the revisions to the Use Classes Order).
- 1.1.1.7 Consideration of the Alperton South LSIS (and the inclusion of 43-47 Alperton Lane within the LSIS) by the Council and other representatives has so far been limited. This is perhaps unsurprising given the

landowner of 43-47 Alperton Lane is the only one affected by the proposed change to the Alperton South LSIS boundary.

- 1.1.1.8 It is therefore fundamental for the Inspectors to consider to what extent the inclusion of 43-47 Alperton Lane within the Alperton South LSIS has been fully considered and whether it is sound. The landowner has no desire or intention for the site to be brought forward under the proposed use(s), thereby calling into question the policy direction being advocated.

2. Matter 6

6.1 – What is the employment need of the Borough over the Plan period? Is this clearly defined within the Plan?

2.1.1.1 Para. 2.6 of the Local Plan states the following:

*“It is anticipated that the population will grow by 64,900 to 393,700 in the period to 2041. To accommodate this will require not only new homes, **but approximately 30,300 new full-time equivalent jobs to meet residents’ needs (our emphasis)**, plus the associated improvements to social and physical infrastructure.”*

2.1.1.2 However, whilst the above is set out within the Local Plan, there is no explicit strategic policy requirement for the delivery of a minimum number of jobs over the Plan period.

2.1.1.3 Similarly, the Local Plan does not set out a minimum floorspace requirement in respect of employment land.

2.1.1.4 In the interest of providing clarity and ensuring soundness, it is recommended that the employment need of the Borough over the Plan period is clearly defined through an appropriately-worded strategic policy in the Local Plan. Doing so will leave no ambiguity in respect of the Borough’s employment need.

6.2 – Has sufficient land been identified to meet the short and long-term employment needs of the Borough over the Plan period? Is the approach consistent with national policy and the London Plan?

Surplus of Employment Land

2.1.1.5 Examining the evidence base – specifically, the Brent Employment Land Demand Study (‘BELDS’) (July 2015) in this instance – the net growth in demand for office and industrial floorspace over the period 2015-2029 is expected to be between 72,200sq.m and 90,500sq.m for office floorspace, and -114,200sq.m and -138,300sq.m for industrial floorspace.

2.1.1.6 In terms of industrial employment land demand, Table 7.8 of the BELDS (as shown below) indicates that there is likely to be a surplus of employment land over the period 2015-2029.

Table 7.8 Industrial Employment Land Demand, 2015-2029

<i>Additional elements of demand for industrial land</i>	<i>Low</i>	<i>Medium</i>	<i>High</i>
		(hectares)	
A. Supply of industrial land occupied by B-use class, including land for utilities, bus and rail depots, and waste management 2015 ²⁹		417.7	
B. Current vacant industrial land 2015		8.1	
C. Total industrial land 2015 (A+B)		425.8	
D. Land demand to 2029 (at 45% plot ratio)	-30.7	-28.1	-25.4
E. Additional demand for waste recycling to 2029		4.8	
F. Normal levels of vacant land for 'friction' in 2029 at 5% ² (5% of A+D+E)	19.6	19.7	19.9
G. Excess vacant land (includes optimal levels of frictional land (F) minus existing vacant land (B))	11.5	11.6	11.8
H. Gross demand for industrial land 2015-2029 (C+D+E+G)	411.4	414.2	417.0
I. Net demand for industrial employment land 2015-31 (H-C)	-14.4	-11.6	-8.8
J. Net change per annum (ha)	-1.0	-0.83	-0.6

Source: AECOM; GLA London's Industrial Land Baseline interim findings (2015); Land for Transport SPG (2012)

Figures may not sum due to rounding

2.1.1.7 The implications of the BELDS analysis is that there is likely to be a surplus of employment land in the region of between 14.4ha and 8.8ha, depending on the demand scenario. This should be considered in the context of the Study estimating that there is likely to be additional demand for between 32,600sq.m and 52,350sq.m of office (B1(a)) floorspace throughout the Borough up to 2029.

2.1.1.8 The median scenario is for a surplus of 11.6 hectares between 2015 and 2029 or -0.83p.a. This is considered by the BELDS as the most likely scenario to occur and so forms the basis of the policy recommendations outlined within the Study. Significantly, however, the BELDS states that this 11.6ha of industrial land “*could potentially be released to other uses between 2015 and 2029*”.

2.1.1.9 In the recommendations section of the BELDS, it states that all existing LSIS will continue to be protected. This recommendation (Recommendation 1) does not identify the need for an extension to LSIS – either cumulatively or individually.

2.1.1.10 Based on the above, and taking into consideration the requirement under Para. 35 of the National Planning Policy Framework ('NPPF') for Local Plans to be 'justified' (i.e. guided by the supporting evidence base), it is our contention that the proposed extension to the Alperton South LSIS to include 43-47 Alperton Lane is unjustified.

2.1.1.11 The West London Employment Land Review (May 2019) (prepared by GL Hearn on behalf of the West London Alliance¹), which is the most recent LBB detailed employment need evidence base document, deals with employment land issues in four of the Alliance's constituent Boroughs – Ealing, Brent, Barnet and Harrow.

2.1.1.12 Within the WLELR, it is recognised that Brent, given the Borough's status as an established industrial location within Greater London, *"has an ample amount of stock with significant transport links and arterial roads that promote the property sector of industrial and logistics"*.

2.1.1.13 Whilst it is recognised that the Greater London Authority ('GLA') do not agree with the methodology used in the creation of the WLELR and the subsequent findings², it should be noted that the WLELR is the most up-to-date of all evidence base documents in respect of employment matters, and that it provides several interesting observations in relation to employment and industrial need in Brent over the period 2016-2041.

2.1.1.14 In terms of industrial employment change over the period 2016-2041, the WLELR sets out the following:

	Manufacturing	Building Trades	Logistics	Transport	Total
Barnet	-700	6,120	800	220	5,430
Brent	-2,510	2,350	1,400	-950	290
Ealing	-3,260	5,360	1,570	-500	3,160
Harrow	-660	3,900	290	-210	3,310

Source: Oxford Economics / GL Hearn

2.1.1.15 As the above shows, it is anticipated that Brent will experience significant manufacturing and transport losses, with growth in the building trades and logistics sectors.

2.1.1.16 In terms of industrial land needs (sq.m) over the period 2016-2041, the WLELR concludes the following:

¹ The West London Alliance is a sub-regional partnership. Its members are the Boroughs of Barnet, Brent, Ealing, Hammersmith and Fulham, Harrow, Hillingdon and Hounslow.

² Great London Authority Brent Local Plan Regulation 19 Consultation (December 2019), pg. 5.

West London Evidence							
	Logistics	Manufact'g	Building Trades	Transport	Other	West Lon Total	% of existing floorspace*
Barnet	50,290	-26,420	21,420	4,650	37,660	87,600	28.1%
Brent	86,890	-95,200	8,230	-20,020	23,730	3,630	0.3%
Harrow	18,480	-25,070	13,640	-4,400	13,490	16,140	2.4%
Ealing	98,490	-124,050	18,760	-10,540	23,520	6,180	0.8%

*based on VOA 2016 data, includes OPDC for Brent and Ealing

2.1.1.17 As the above shows, the significant manufacturing floorspace loss anticipated in Brent reduces the overall aggregate need considerably, meaning that provision of industrial land required over 2016-2041 is just 0.3% of the existing floorspace.

2.1.1.18 This analysis represents a considerable difference to that presented within the London Industrial Land Demand Survey ('LILDS') (October 2017) which forms part of the Draft London Plan evidence base.

West London Evidence							LILDS			
	Logistics	Manufact'g	Building Trades	Transport	Other	West Lon Total	Wareh'g	Industrial	Sub total	LILDS Total
Barnet	7.7	-4.1	3.3	0.7	5.8	13.5	9.3	-2.2	7.1	7.3
Brent*	13.4	-14.7	1.3	-3.1	3.7	0.6	60.9	-21.6	39.3	43.0
Harrow	2.8	-3.9	2.1	-0.7	2.1	2.5	4.0	-5.1	-1.1	1.2
Ealing**	15.2	-19.1	2.9	-1.6	3.6	1.0	49.7	-18.8	30.9	35.6

* logistics 18.1ha and total of 5.3ha under a higher employment density

** logistics 21.0ha and total of 7.8ha under a higher employment density

2.1.1.19 As shown above, the findings from the WLELR suggest that 0.6 hectares of additional industrial land is required over the Plan period, primarily to account for projected demand in the logistics sector. This is a considerable reduction to that required under the LILDS (43 hectares).

2.1.1.20 Going further, the WLELR details the following industrial land need across each sector and use class in hectares:

	B1c	B2	B8	Total
Manufacturing		-14.65		-14.65
Building Trades			1.27	1.27
Other	1.57	0.84	1.24	3.65
Transport			-3.08	-3.08
Logistics			13.37	13.37
Total	1.57	-13.80	12.79	0.56

2.1.1.21 The evidence contained within the WLELR suggests that the industrial land need in Brent is not as dire as the LILDS suggests, thereby casting doubt on the decision to identify Brent as a Borough that is required to provide industrial floorspace capacity in the Draft London Plan. This is a fundamental issue for the examination, and the disparity between the findings has significant implications on the approach to allocations and policies in the emerging Local Plan.

2.1.1.22 In terms of whether sufficient land has been identified to meet the short and long-term employment needs of the Borough over the Plan period, it is difficult to respond to this question with any great certainty given the BELDS, the WLELR, and the evidence base for the London Plan all report different conclusions in terms of employment needs, particularly in relation to industrial land.

2.1.1.23 Furthermore, there is no strategic-level policy that sets out how much employment land is required to be delivered over the Plan period.

2.1.1.24 NPPF Para. 11(a) requires Local Plans to positively seek opportunities to meet the development needs of the area. Para. 11(b) requires strategic policies to provide for objectively-assessed needs. In respect of both parts of Para. 11, it is unclear as to what extent intensification within existing LSIS / SIL boundaries meets the required need.

2.1.1.25 Based on the above and the relevant evidence base documents, it is the landowner's contention that the Local Plan in relation to employment policies (specifically Policy BE2) cannot be considered to be sound, and that the inclusion of 43-47 Alperton Lane within the Alperton South LSIS is unjustified.

Conformity with the London Plan

2.1.1.26 The starting point for the designation of the site as forming part of the Alperton South LSIS is Policy E6 of the Draft London Plan. This policy in Part A stipulates that, in their Development Plans (which the new Local Plan will be once adopted), Boroughs should:

- 1) Designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps **justified by evidence in local employment land reviews [our emphasis]** taking

into account the scope for intensification, colocation and substitution (set out in Policy E7 Industrial intensification, colocation and substitution).³

2.1.1.27 In addition, the supporting text states at 6.61 that:

*“Boroughs may designate locations that have particular local importance for industrial and related functions as Locally Significant Industrial Sites. These designations **should be based on evidence in strategic and local demand assessments [our emphasis]** and should complement provision in SILs. Inner London sites providing sustainable distribution services for the Central Activities Zone and Northern Isle of Dogs may be particularly appropriate for this designation.”⁴*

2.1.1.28 The Draft London Plan clearly sets out the importance of Local Planning Authorities not only justifying the designations and associated policies for LSIS through the evidence in local employment land reviews, but also the range of industrial and related uses that are acceptable in LSISs.

2.1.1.29 As set out in the previous part of our response to Question 6.2, the landowner does not consider the designation of 43-47 Alperton Lane within the Alperton South LSIS to be justified.

2.1.1.30 The evidence base does not explicitly set out a requirement for LSIS boundaries to be re-drawn. Furthermore, the BELDS suggests a surplus of industrial land within the Borough, whilst the WLELDR suggests that a negligible increase (c.0.6 hectares) is required over the Plan period. This 0.6-hectare required is referenced in Para 6.4.18 of the Local Plan.

2.1.1.31 The landowner therefore does not consider the requirements of Policy E6 to have been satisfied in the proposed extension of the Alperton South LSIS and that the policy approach being pursued under BE2 is therefore unsound.

Conformity with National Planning Policy

2.1.1.32 Para. 35 of the NPPF sets out the requirements that must be met in order for a Local Plan to be found sound. These four requirements are duties the Council must seek to meet. Accordingly, if the Local Plan fails to accord with all four requirements, the Local Plan is incapable of complying with the NPPF. As a result of s.19 of the Planning and Compulsory Purchase Act 2004, these are legal requirements.

2.1.1.33 It is the landowner’s contention that neither the wider strategy nor specific Policy BE2 comply with the requirements of Para. 35. For the reasons set out above, the approach is not considered to be justified. The evidence base does not specifically require the extension of the Alperton South LSIS boundary. The Local Plan is also not considered to be effective, given the delivery of 43-47 Alperton South as an industrial use site is not agreeable to the landowner.

³ Draft London Plan [Clean Version] (July 2019), pg.218.

⁴ Draft London Plan [Clean Version] (July 2019), pg.219.

Recommendations

- 2.1.1.34 It is recommended that 43-47 Alperton Lane is removed from the Alperton South LSIS as it is not justified.
- 2.1.1.35 It is also recommended that an up-to-date review of employment needs is undertaken given the disparity across the documents within LBB's evidence base and when comparing the LBB evidence base with the Draft London Plan evidence base. Given the proposed changes to the Use Classes Order due to come into force on 1st September, it is recommended that this employment needs review takes the potential implications into consideration.
- 2.1.1.36 It is the landowner's view that the direction of travel in the Local Plan should first be to protect and intensify existing LSIS. Undertaking this approach and applying the 0.65 Draft London Plan floorspace-to-site ratio to existing LSIS will help to ascertain exactly to what extent employment and industrial land needs have been met. It is at that point that extension to LSIS should be considered. The Local Plan in this instance has concluded that extensions are required despite significantly different findings across the evidence base in terms of overall need. The policy approach is therefore unsound.

6.3 – Is the amount of employment provision and its proposed distribution consistent with the evidence base? Is the adopted approach sound and based on robust and up-to-date evidence?

Amount of Employment Provision

- 2.1.1.37 The BELDS was produced by the Council in July 2015 to inform the employment policies within the emerging Local Plan and builds on the preceding BELDS documents produced in 2009 and 2013 respectively.
- 2.1.1.38 The 2015 BELDS sets out that there is a total of approximately 418ha of land currently in active industrial use in the Borough. The demand forecast shows that there is projected to be a decrease in demand for industrial land of between 14.4ha and 8.8ha in the period 2015 to 2029; **that is industrial land that can be released for other uses**. The 2015 BELDS generally projects a decreasing level of demand for industrial uses over the Plan period.
- 2.1.1.39 The findings of the 2015 BELDS in respect of industrial land demand are clear; there is likely to be a **surplus of industrial land over the Plan period**. This should be considered in the context of the Study estimating that there is likely to be additional demand for between 32,600sq.m and 52,350sq.m of office (B1(a)) floorspace throughout the Borough up to 2029. These figures only serve to reaffirm the importance of utilising existing employment land as efficiently and effectively as possible.
- 2.1.1.40 It is therefore the landowner's contention that when considered against the 2015 BELDS, the designation of 43-47 Alperton Lane is **unjustified** and does not take into consideration the evidence and recommendations of the BELDS; a key document in the Local Plan evidence base.

- 2.1.1.41 Furthermore, and as already set out in the response to Question 6.2, the evidence contained within the WLELR suggests that industrial land need in Brent is not as high as the London Plan evidence base suggests, with the WLELR finding that only c.0.6 hectares is required over the Plan period.
- 2.1.1.42 This 0.6-hectare requirement is at odds with the Brent Industrial Land Audit ('BILA') (October 2019) which proposes a 1.49-hectare increase in SIL and LSIS floorspace through the extension of existing boundaries. The increase to the Alperton South LSIS boundary equates to 0.49 hectares. Removing 43-47 Alperton Lane from the Alperton Lane LSIS would still result in a 1-hectare increase in industrial land, which is well above the recommended requirement set out in the WLELR.
- 2.1.1.43 This increase of 1.49-hectares does not accord with the findings of the BELDS and WLELR and represents an increase in employment land well above what the evidence base suggests.
- 2.1.1.44 In seeking to justify the amended LSIS boundary, the BILA states that the industrial units to the north *"form a natural extension to the LSIS"* and that the boundary of the LSIS should be extended *"to protect the industrial function of these premises"*. However, there is little evidence to support the enhanced LSIS area, and it is therefore the landowner's view that the amended designation is **unjustified**.
- 2.1.1.45 The landowner does therefore not consider the approach to include 43-47 Alperton Lane within the Alperton South LSIS to be justified.

Distribution

- 2.1.1.46 In the 2015 BELDS, 43-47 Alperton Lane is assessed under reference C16. This assessment considers the site to be in a poor or very poor condition and, crucially, identifies the site as being *"inadequate for B2/B8 use⁵"*. As a result of the site assessment, it is concluded that the site should be ***"retained as an LEA"*** (unless demonstrated that release is justified in accordance with Recommendation 3); ***not*** designated as part of the Alperton South LSIS.
- 2.1.1.47 For clarity, Recommendation 3 stipulates the following:
- "To help ensure there is sufficient capacity to meet projected demand for industrial land to 2029 existing LEAs should continue to be protected for industrial employment use unless they are evidenced to meet all of the criteria below.*
- *There is no evidence of current or future market demand for the site as evidenced through a period of at least 24 months of active marketing for industrial employment uses at realistic market rates.*
 - *Poor access from the strategic road network i.e. they can be accessed only via local roads.*
 - *A lack of on-site servicing such as loading/unloading bays and/or inadequate parking provision.*

⁵ AECOM Employment Land Demand Survey (July 2015), pg.49.

- *The overall total quantum of industrial employment land release within the Borough for the plan period (as identified within this study) has not been exceeded.”*

- 2.1.1.48 Providing any development can provide adequate justification in accordance with Recommendation 3, the 2015 BELDS clearly stipulates that the release of land within LEAs would be acceptable in principle.
- 2.1.1.49 Although the Study (at Recommendation 1) recommends the retention and protection of existing LSIS, it **does not** propose widening existing LSIS boundaries to accommodate additional sites. Furthermore, the Study (at Recommendation 2) advises the Council to “*consider a more flexible approach to changes of use away from industrial uses that total approximately 5.81ha at Northfields Industrial Estate*”. The identification of additional LSIS land in the Local Plan, therefore, is considered contrary to not just the evidence in the 2015 BELDS which suggests a surplus of industrial floorspace over the Plan period, but also the site-specific recommendations in respect of site reference C16.
- 2.1.1.50 In addition to this, 43-47 Alperton Lane is specifically not considered to be appropriate for the proposed constraining land use position.
- 2.1.1.51 The social and economic assessment of the Alperton South LSIS within the BILA states that the LSIS “*benefits from good access to services being adjacent a sports ground and walking distance from a number of nearby primary and secondary schools*”. By virtue of being located closer to Ealing Road and the local services referenced, 43-47 Alperton Lane is considered to have even better access to existing local services. It is therefore considered that designating the site for solely industrial use would be at odds with the sustainable credentials of the site.
- 2.1.1.52 Furthermore, it should be noted that the Alperton South LSIS is not considered to be appropriate for co-location, yet it appears as though co-location has only been assessed across entire LSIS designations. Clearly, certain parts (such as edges, for example) of LSIS will be more suitable for co-location than others, and in this instance the sustainable location of the Alperton South LSIS should render the site (or at least part of it) an appropriate location for co-location. It is considered 43-47 Alperton Lane in particular is a more suitable location for co-location.
- 2.1.1.53 It should also be noted that the adjacent site to the east (Local Plan ref. BWSA16) – Carphone Warehouse, 416 Ealing Road – has been allocated for mixed-use development comprising residential, retail, commercial and community uses. A planning application (LPA ref. 20/1683) pertaining to the emerging allocation was submitted in June 2020 for 132 dwellings and flexible commercial space but as yet remains undetermined.
- 2.1.1.54 In addition to the neighbouring mixed-use allocation, the area fronting Ealing Road has also been identified as an ‘Intensification Corridor’. Within these areas, tall buildings up to around 15-metres or 5-storeys could be considered acceptable. In the Ealing Road Intensification Corridor, residential-led mixed-use development is prioritised.

2.1.1.55 The landowner therefore has significant reservations about the potential land use conflict between industrial intensification at 43-47 Alperton Lane and the adjacent high-density residential-led development. This is also a concern that was raised in the Regulation 19 consultation from EHG Alperton (landowners of 416 Ealing Road).

2.1.1.56 Furthermore, Alperton Lane currently acts as a hard, physical buffer between the industrial uses to the south and residential-led uses to the north. Extending the LSIS boundary to incorporate 43-47 Alperton Lane would represent direct encroachment on existing home and business owners operating in the vicinity and eradicate the status of Alperton Lane as a physical buffer.

2.1.1.57 It is therefore the landowner's view that extending the Alperton South LSIS boundary is not justified from a distributive standpoint, and represents an unsound policy approach being pursued in the wrong place in the Borough.

Recommendations

2.1.1.58 The landowner supports the intensification of existing LSIS sites, but the inclusion of 43-47 Alperton Lane within the Alperton South LSIS is unjustified and an illogical spatial planning approach given the sensitivity of surrounding development. It is therefore recommended that 43-47 Alperton Lane is removed from the Alperton South LSIS.

Other Matters

2.1.1.59 It is noted that in a letter dated 4th August 2020, the Inspectors recognise the potential impact of the proposed changes to the Use Classes Order due to come into force on 1st September 2020 and the implications this could have in respect of the Local Plan.

2.1.1.60 It is suggested within the letter that the ramifications of these changes will be discussed during the relevant hearing sessions. In advance of the hearing sessions, however, we wish to make the following observations:

- Use Classes B2 and B8 are to remain the same, but B1(c) is to move into new Use Class E.
- Any building under new Use Class E would be able to move flexibly across a greater variety and diversity of land uses without constituting development.
- It is noted that Para. 6.4.20 of the Local Plan refers to calculating existing employment floorspace by including all B-class and closely-related Sui Generis uses. What implications will the changes to the Use Classes Order have and should the evidence base be updated to reflect these?
- Class ZA, which is due to come into force on 31st August 2020, allows for the demolition of certain types of commercial buildings to facilitate the development of new homes. Does this need to be taken into consideration in the updated evidence base?

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