

# HEARING STATEMENT ON BEHALF OF ST GEORGE WEST LONDON LIMITED

## MATTER 6 – ECONOMY AND TOWN CENTRES

## MATTER 9 – SITE ALLOCATIONS

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### 1 Economy – Inspectors MIQ

**Main Issues:** Are the policies in relation to employment needs justified, deliverable and consistent with national policy?

**6.5** In the context of policy BE1 (Economic growth and employment opportunities for all), how has the 10% threshold level been arrived at? Why is the floorspace threshold level 3000sqm? Where is the evidence base to support this figure?

**6.4.12** sets out a number of requirements in relation to affordable workspace and appears to provide the justification for policy BE1. For example, the supporting text advises that this should be secured for the lifetime of the development and that a Section 106 agreement will be used to secure these measures. Is the policy sufficiently effective without these requirements within the policy wording? Should the policy wording reflect this? Is the policy sufficiently flexible?

**6.4.13** also appears to introduce flexibility and additional criteria into the policy application. Again, should this wording be within the policy and not the supporting text?

### 2 Hearing Statement

#### Relevant Part of Policy

- 2.1** This statement refers to Policy BE1 Economic Growth and Employment Opportunities which requires “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”.

#### Soundness

- 2.2** This is an unsound policy as it is not justified by a proportionate (or any) evidence base; nor effective as a deliverable policy. It is also inconsistent with national policy (paragraph 31, 34, 35 & 57). It could undermine the deliverability of the plan.
- 2.3** The Council has not issued for public consultation a viability assessment to support this policy, despite still promoting it. It would seem prejudicial to the public and the 12<sup>th</sup> August and 26<sup>th</sup> August 2020 hearing deadlines for the Council to pursue a policy without the information being made available, particularly as it relates to on-site delivery and financial contributions which could undermine the Council’s site allocations.
- 2.4** The practical implications of the policy are extreme. Applied in practice to the Northfields development (Site Allocation BSWSA7: NORTHFIELDS), the applicant would be required to deliver at least 35,000m<sup>2</sup> of affordable Class B workspace. This is twice the replacement floorspace required by the adopted Brent Plan and London Plan to release the site from its SIL allocation.

## NOTE continued

2.5 It is unclear how the policy applies to Use Class E.

### Justification

2.6 Policy BE1 Economic Growth and Employment Opportunities for All requires 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 3,000 sqm to be affordable workspace in the B use class. Supporting paragraph 6.4.13 confirms that in some circumstances rather than provide workspace on-site, it may be appropriate for developments to provide financial contributions to delivering workspace elsewhere within the Growth Area or town centre. For example, where it is preferable to create one larger workspace, with shared management arrangements. Discussion with the council and operators will determine where this is appropriate.

2.7 The Council confirmed (February 2020) in response to objections that the Council had viability tested the policy, but only in respect of a policy which promoted 10% affordable workspace “where 3,000 sqm of industrial/office uses was being proposed”, not for any scheme (of any use) over 3,000m<sup>2</sup>.

2.8 To date the Council has not issued a viability assessment to justify the policy, albeit it is still promoting it.

2.9 The Greater London Authority has raised objection to BE1 advising that Affordable Workspace should only be sought within specific locations or secured through S106 agreements. An approach should be adopted which sets out what type of workspaces and suitable business spaces are required and where, based on up to date evidence. This implies that it should not be a blanket policy approach as drafted at present.

2.10 The Council’s response to the GLA is that “Policy BE2 identifies in which locations this should take place.” Policy BE2 relates to Strategic Industrial Sites and Locally Significant Industrial Sites. The Council’s response also confirms that “Other sites will come forward for intensification as governed by the market, and in broad alignment with the West London Employment Land Review”. This is ambiguous and could relate to any site in the Growth Areas.

2.11 Even if this is the case, the policy is undeliverable as it would require an excessive quantum of affordable workspace in SIL and LSIS as evidenced by the Northfields example.

### Resolution

2.12 The policy requirement is unsound and should be deleted.

2.13 Alternatively, if retained, it should only apply to schemes “where 3,000 sqm of industrial/office uses is being proposed”.

## 3 Site Allocations South West – Inspectors MIQ

**9.35 Site allocation BSQA7: Northfields - does the policy text accurately reflect the existing uses and planning history of the site?**

3.1 MM219 and MiM58 adequately addresses the issue.