

Planning Policy
Brent Council
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

By email: planningstrategy@brent.gov.uk.

4 December 2019

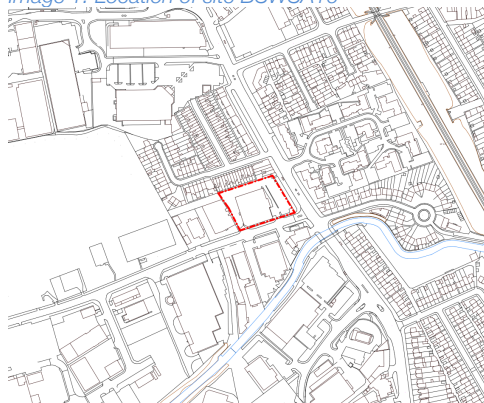
Dear Sir/Madam,

[Brent Local Plan Regulation 19 Consultation](#)
[Site BSWSA16: Carphone Warehouse 416 Ealing Road and the Draft Proposals Map](#)

This representation is submitted on behalf of our client, EHG Alpertone, to the Regulation 19 Brent Local Plan Proposed Submission document. The Local Plan will cover the diverse 'places' in Brent and outline how each area could change, develop and feel in the future. This representation submitted is in relation to site allocation BSWSA16 'Carphone Warehouse 416 Ealing Road' and the Draft Proposals Map.

[Site BSWSA16: Carphone Warehouse 416 Ealing Road](#)

Image 1: Location of site BSWSA16



The draft site allocation states that the site is suitable for mixed-use retail/commercial/community and residential uses, with an indicative capacity of 80 homes. Comments are as follows, *'Loss of majority of retail acceptable. Some replacement to serve local area sought/ active ground floor frontages particularly along Ealing Road.'*

Our client owns the site at 416 Ealing Road and so is broadly supportive of this allocation, however our client is in advanced discussions with the Council (ref.19/0262/PRE) in relation to developing the site for a higher density mixed-use scheme of approximately 150 residential units with approximately 400sqm of commercial floorspace. Both the Council and the Greater London Authority have expressed support for a scheme of this approximate size

and certainly one of greater than the 80-unit draft allocation. It is therefore requested this site allocation is amended to give an indicative housing capacity of 150 homes in line with the forthcoming expectations for this site and the national and strategic planning policies, which seek to maximise the use of previously developed sites.

Draft Proposals Map

Image 2: Regulation 18 proposed LSIS boundary

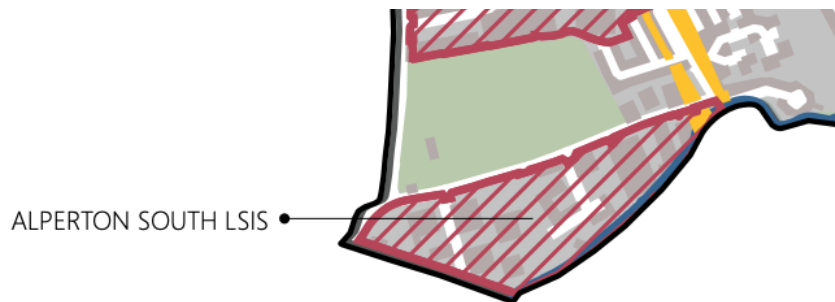


Image 3: Regulation 19 proposed LSIS boundary



The boundary of the Locally Significant Industrial Site (LSIS), 'Alperton South', has been revised since the Regulation 18 Preferred Options Local Plan to now include the site to the west of 416 Ealing Road, 45-47 Alperton Lane, as shown as a red/brown hatching in image 3.

The associated policy approach relating to the Alperton South LSIS is to intensify the existing B Class uses. Draft Policy BE2 states *'These sites will be protected for solely employment uses within use class B1c, B2, B8 and closely related sui generis uses. Development will be supported which increases the amount of employment floorspace in these use classes, including start-up space, move on space. Any loss or reduction in floorspace will be resisted'*.

Principally, it is not fully understood why 45-47 Alperton Lane is now proposed to be included in the Alperton South LSIS for a number of reasons. The 2015 Brent Employment Land Study identified this particular site, C16 Alperton Lane, to be in a poor/very poor condition, as well as a site where parking is inadequate for B2/B8 uses. The Brent Local Plan Preferred Options consultation responses summary October 2019 does not include any specific consultation response related to this land, so does not set out the reason as to why the site is now to be included. Additionally, the Brent Industrial Land Audit October 2019 reviewed the boundary of Alperton South LSIS and made the following comment, to which the client principally disagrees with:

'To the north the site is bounded by open space, a large format retail unit and two industrial units comprising factories, warehouses and premises. In terms of function, these industrial premises form a natural extension to the LSIS. This comprises a site of 4,900sq.m. To protect the industrial function of these premises the LSIS boundary is to be extended to encompass them.'

The site does not form a natural extension to the LSIS, Alperton Lane is in fact considered to form the natural boundary to the LSIS particularly given emerging plans for the Curry's site. Moreover, the site in question has been subject to pre-application discussions (ref. 16/0537/PRE) where the Council were supportive of a residential led development. Furthermore, the surrounding context of the site is markedly different to that of the existing LSIS south of Alperton Lane. There is traditional two storey terraced housing immediately to the north of the site on Burns Road and an emerging high-density residential development at Curry's 416 Ealing Road immediately to the east. The industrial uses are located across Alperton Lane. The immediate context is therefore predominantly residential in nature and so not considered to be suitable for intensified B class uses. In the absence of clear or robust justification for including 45-47 Alperton Lane it is requested in the first instance this parcel of land be removed from the Alperton South LSIS.

Should the Council reject the above position, in the second instance it is requested this parcel be separated into a separate LSIS from Alperton South where co-location of uses would be acceptable. It appears illogical as to why this parcel of land is protected for solely employment uses as opposed to suitable for co-location of uses; this site in our view could be a bridge between the residential and the industrial uses where a co-location of uses would be most appropriate.

I trust the above is clear and the suggested amendments to the site allocation BSWSA16 and the Alperton South LSIS will be considered, however please don't hesitate to get in touch should you wish to discuss any of the above.
