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VIA EMAIL: planningstrategy@brent.gov.uk

29962/A3/IF/sl
5 December 2019

Dear Madam/Sir

RE:168-174 HONEYPOT LANE, HA7 1QL - LOCAL PLAN REGULATION 19 CONSULTATION

On 3 January 2019 Barton Willmore LLP issued representations on behalf of our client UK & European Investments to the 'Preferred Options' (Regulation 18) consultation for the emerging Brent Local Plan. These are provided at **Appendix 1**.

UK & European Investments is now known as Blue Coast Capital. These representations, which respond to the Regulation 19 Consultation on the emerging plan, are made on behalf of Blue Coast Capital.

Blue Coast Capital owns the above site, which is located in the emerging Plan's draft allocation BNSA3 (Queensbury LSIS and Morrisons).

Previous Representations

In October 2019 Brent Council published a 'Brent Local Plan Preferred Options Consultation Responses' report. This inter alia responded to points raised in our January 2019 representations. The Council's comments are reproduced in **Appendix 2**.

December 2019 Representations

Draft Local Plan Policy BE2 Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)

Our client welcomes the change in the approach towards the delivery of affordable housing at LSIS sites under this policy, as per point 2 of our representations.

Our client maintains however that Policy BE2 should be clearer about the quantum of employment floorspace that may be sought within redevelopment schemes (as per point 1 of our previous representations).

Draft Local Plan Allocation BNSA3: Queensbury LSIS and Morrisons

Our client is pleased to see that the Council agree that a masterplan process for allocation BNSA3 might result in different development capacities than currently indicated in the draft Local Plan.

As per points 3 and 4 of our previous representations, we expect this masterplan process may well conclude the area has substantively more development potential than indicated in the emerging site allocation. Indeed, whilst the draft allocation refers to building heights no higher than six storeys, the Council has already approved development of up to seven storeys within this same allocation when granting permission for redevelopment of the Morrisons store (as cited in our January 2019 representations).

Our client remains firmly of the view that Policy BNSA3 should be amended so it does not refer to any particular number of homes and to not include any numerical references to storey heights. To do so sets false expectations for decision-makers and the general public alike and so risks artificially redistricting the delivery of much needed new homes and failing to optimise this promising mixed-use development opportunity.

Next Steps

As per the submitted forms, our client currently wishes to participate at the oral part of the examination. Please can we more generally be kept informed of the Local Plan's progress.

Please do not hesitate to contact me if you have any queries regarding these representations and we will be happy to assist.

Enc. Survey form – Policy BE2 (5 December 2019)

Survey form – Policy BNSA3 (5 December 2019)

APPENDIX 1 – PREFERRED OPTIONS CONSULTATION RESPONSE (JANUARY 2019)

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
ENVIRONMENTAL PLANNING

HERITAGE
GRAPHIC COMMUNICATION
PUBLIC ENGAGEMENT
DEVELOPMENT ECONOMICS

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Dear Mr Lewin

RE:168-174 HONEYPOT LANE, HA7 1QL - DRAFT LOCAL PLAN CONSULTATION

29962/A3/IF/sl
3 January 2019

Barton Willmore LLP has been instructed by our client UK & European Investments (UK&EI) to make representations to the current consultation on Brent Council's draft Local Plan.

UK&EI is an investment and development business, founded in 1980 and headquartered in London. UK&EI is the owner of the above land (168-174 Honeypot Lane) which is located in the north of the Borough.

Proposed Site Allocation

Under the draft Local Plan most (but not all) of 168-174 Honeypot Lane falls within the proposed 8.24 hectare 'BNSA3: Queensbury LSIS and Morrisons' site allocation.

The proposed allocation supports '*co-location*' at this site. Co-location means introducing other land uses, including new homes. Under the draft Local Plan this opportunity is to be realised through a masterplanned process. These concepts also appear in the emerging draft London Plan.

UK&EI strongly supports the principle of this allocation, the proposed co-location of uses and a masterplanning process. UK&EI's representations, as set out below, accordingly focus on how this can be pursued to realise the widest possible benefits. These representations recommend changes to the draft Local Plan so that it better supports fundamental planning objectives set out in nationally planning policy and the current and emerging Development Plan, including:

- optimising the potential of this land to deliver new homes and accommodate jobs; and
- delivering socially, environmentally and economically sustainable development.

Context

168-174 Honeypot Lane

168-174 Honeypot Lane measures c. 0.95 hectares. It accommodates a building measuring c. 3,725 sq m, an associated service yard and forecourt parking. All parts of the site are used in association with a Selco Builders Warehouse. Customers access the Builders Warehouse via Honeypot Lane to the south. Servicing takes place from Lowther Road to the north.

At its closest, the site is less than 150 m distance (as the crow flies) from Queensbury underground station. From the same location (the servicing access at Lowther Road) this is a 3 minutes walking time. Bus stops are also located on Honeypot Lane. Whilst the online Webcat service suggests the site has a PTAL rating of 2-3, this appears to be a case study for when the PTAL methodology (which does contain flaws) underestimates the actual accessibility of a site. This is clearly a very accessible location for workers and potential residents, as well as visitors.

We note that, as currently drawn, the proposed BNSA3: Queensbury LSIS and Morrisons' site allocation excludes part of the site's rear service yard. This also occurs in the Council's current Policies Map and the 'Brent Employment Site Analysis' evidence base document (November 2018). Whilst we recognise the Borough boundary runs through this site, the allocation as drawn does not meet the boundary.

The above means site areas are undercounted in the draft Local Plan (and evidence base document). For the purposes of these representations we have however cited the draft Local Plan figures. We can provide a red line plan to the Council identifying the extent of our client's ownership if this is helpful.

Honeypot Lane LSIS

168-174 Honeypot Lane falls within the 'Lowther Road' cluster of the designated Honeypot Lane Locally Significant Industrial Site (LSIS). This is the larger of two clusters together forming the LSIS (which the Site Analysis document calculates as 3.79 hectares).

168-174 Honeypot Lane occupies around a quarter of this LSIS and, as the draft Local Plan recognises, together with an adjacent B&Q forms the majority of the Lowther Road cluster. The draft Local Plan describes the LSIS as '*underused*'.

In terms of its offer, the Site Analysis document describes the LSIS as '*dominated by quasi industrial uses*'. The report describes how the LSIS has a '*low employment density*', indeed the '*lowest employment density based on employment per ha*' in the Borough. The figure provided in the report is 32 people employed across the whole LSIS, equating to just 8 employees per hectare, which does not seem likely to be the case. The Site Analysis document states in one place that '*co-location could restore a higher proportion of industrial employment uses on the site*'. Elsewhere it states that '*employment levels should be maintained*'.

Morrisons Foodstore Site

As well as the LSIS, allocation BNSA3 also includes the Morrisons site. On 10 October 2018 the Council's Planning Committee resolved to grant planning permission for a scheme at the Morrisons site which would deliver 194 new homes (ref: 18/2183).

Proposed Policies

The 'Vision' for the 'Worth' of the Borough states: '*Intensification and co-location within the locally significant industrial sites in this place will create employment space that meets 21st century needs and continue to provide good local employment opportunities.*' It is unclear what this means for a landowner/developer.

The proposed allocation BNSA3 states inter alia that:

- the allocation as a whole has the capacity for 383 dwellings over a 10+ year period;
- '*building heights should be no higher than 6 storeys and should step down towards the adjacent residential that will remain*'; and
- '*fragmented ownership of the site could increase time taken to deliver, and if not properly managed result in piecemeal, rather than comprehensive approach to redevelopment, resulting in disjointed environments*'.

Separately, Policy BE2 Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) identifies this LSIS for '*intensification through co-location*' which will provide inter alia '*a net increase in employment floorspace*'. The phrase '*intensification through co-location*' does not appear in the emerging draft London Plan. Whilst the general principle of seeking a net increase in employment floorspace in the Borough is in line with the strategic objectives of the draft London Plan, the approach to be taken on a site-by-site basis is more nuanced than this.

Representations

The draft Local Plan must satisfy the tests of soundness as outlined in the National Planning Policy Framework. This includes delivering the fundamental planning objectives described at the start of this letter. Delivering these objectives also requires designing a policy approach that will encourage different landowners at the proposed site allocation to bring their land forwards for development. UK&EI accordingly makes the following **4 recommendations**. These are set out in the boxes below.

1. Seeking no overall net loss of industrial floorspace capacity at this LSIS

UK&EI is one of the largest landowners in the proposed site allocation. It owns an asset which has value.

Landowners will only contemplate bringing forward land for development if it is in their interests. The draft Local Plan should provide clear guidance to landowners. The draft Local Plan must also be aligned with the draft London Plan, both for reasons of 'soundness' and to avoid different expectations emerging through the decision-making process.

Given this will be a very significant consideration for the landowner, the draft Local Plan (and particularly Policy BE2) must be clearer about the quantum of employment floorspace that may be sought.

Policy BE2 should be amended so it seeks that development at the Honeypot Lane (Lowther Road) LSIS delivers '*no overall net loss of industrial floorspace capacity*', as per the definition in the draft London Plan.

Other designated industrial land will remain identified for *'intensification'* and so can *'provide capacity'* for industrial floorspace in the Borough, as per the draft London Plan.

2. Setting affordable housing in line with the draft London Plan

Policy BE2 states that the Council will seek *'50% affordable housing'* from schemes at sites including the Honeypot Lane (Lowther Road) LSIS.

This is not aligned with the emerging draft London Plan (as amended by *'minor suggested changes'*). The draft London Plan states that *'the Mayor expects that residential proposals on industrial land should deliver at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.'* Where schemes achieve no *'net loss of industrial capacity'* (as defined within the Plan) the general policy approach applies.

Policy BE2 should be amended to clarify that affordable housing will be sought from development proposals as per the draft London Plan. It should specifically state that *'50 per cent affordable housing will be sought where proposals delivering net additional homes on industrial land would result in a net loss of industrial capacity.'*

3. Avoiding artificially redistricting the delivery of much needed new homes

This allocation self-evidently presents a very promising mixed-use development opportunity. Parts of it (including the UK&EI land) are a very short walking distance from Queensbury station and enjoy good bus connections. Its potential has previously been missed. A masterplan approach, considering the allocation as a whole (including Morrisons) may well conclude that it has substantively more development potential than indicated in the draft Local Plan.

Indeed, it is unclear why the draft allocation identifies capacity for just 383 homes. Given the allocation (currently) measures 8.24 hectares this is a density of just 46 homes per hectare. If it is assumed that the resolution to grant at Morrisons for 194 homes is all that is delivered from that land, this leaves a residual figure of just 189 homes across (what is currently calculated as) 3.79 hectares in the LSIS. This would mean co-location would deliver homes at a density of just 51 homes per hectare. This is an implausibly low figure. It is surely unhelpful to include such a figure in the Local Plan, where it risks being interpreted (by either the general public or the decision-maker) as an aspiration.

A masterplan process will establish a potential number of new homes that are deliverable at BNSA3: Queensbury LSIS and Morrisons. The allocation should not refer to any particular number of homes for the reasons outlined.

4. Ensuring this promising mixed-use development opportunity is optimised

Until a masterplan process is carried out there is no basis for concluding what level of density and massing may be appropriate across the allocation. To do so runs the risk of leading to the suboptimal development of a very promising mixed-use development opportunity.

Artificial thresholds (e.g. on storey heights) are wholly at odds with England's discretionary planning system. They give the general public and potentially the decision-maker a false sense of what is or is not to be supported.

Moreover, whilst the draft allocation refers to '*building heights... no higher than 6 storeys*', the recent planning application at the Morrisons foodstore site (which is within the allocation) has seen the Council and the Mayor of London support a scheme of up to 7 storeys.

A masterplan process will establish the appropriate the level of density and massing which can and should be delivered at BNSA3: Queensbury LSIS and Morrisons. The allocation should not include any numerical references to storey heights for the reasons outlined.

Next Steps

Thank you for reviewing these representations. Please can our client be kept informed of future progress with the draft Local Plan.

APPENDIX 2 – EXTRACTS FROM BRENT LOCAL PLAN PREFERRED OPTIONS CONSULTATION RESPONSES

Chapter	Para / Policy	Name / Organisation	Content Summary	Officer Response	Proposed Change
5.3 North	BNSA3	UK & European Investments	UK&EI strongly supports the principle of this allocation, the proposed co-location of uses and a masterplanning process. Site capacity, density, height and massing should be determined through a masterplanning process and the allocation should not specify a number.	It is appropriate for the site allocation to set parameters for the development to inform a detailed masterplan. It is accepted that the masterplan process might test these assumptions and result in a different capacity. Nevertheless, in the absence of greater detail of testing the Council considers the parameters identified as appropriate.	No change
6.4 Economy	BE2	UK & European Investments	Policy BE2 should be amended so it seeks that development at the Honeypot Lane (Lowther Road) LSIS delivers 'no overall net loss of industrial floorspace capacity', as per the definition in the draft London Plan. Other designated industrial land will remain identified for 'intensification' and so can 'provide capacity' for industrial floorspace in the Borough, as per the draft London Plan. Policy BE2 should be amended to clarify that affordable housing will be sought from development proposals as per the draft London Plan. It should specifically state that '50 per cent affordable housing will be sought where proposals delivering net additional	Brent is identified as a provide capacity borough and all SIL and LSIS sites currently have a plot ratio below 0.65. As such an uplift will need to be sought across all sites. As such reference to the requirement for 50% affordable housing has been removed.	Text to be deleted - 50% affordable housing;

Chapter	Para / Policy	Name / Organisation	Content Summary	Officer Response	Proposed Change
			homes on industrial land would result in a net loss of industrial capacity.		