

5th December 2019



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

Dear Sir / Madam

**Representations to the Proposed Submission version of the new Local Plan
Chapmans Park Industrial Estate, Willesden, London, NW10 2DY**

Thank you for providing us with the opportunity to respond to the consultation on the Council's proposed submission version (Regulation 19) of its new Local Plan. I write on behalf of our client, Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited, who have a freehold interest in the above site.

Within the latest version of the new Local Plan, I note that the Council is still proposing to retain the Church End Locally Significant Industrial Site (LSIS) designation covering the site and the neighbouring industrial estates. I also note that the Council is still proposing to allocate the wider LSIS for mixed-use housing, employment and supporting community facilities (Site Ref. BSSA4). This draft allocation is still supported in principle by our client, however, there remains concerns with the indicative residential capacity and the requirement for supporting community facilities.

Below, I set out a brief summary of the site and the surrounding area again for ease, before setting out more detailed comments on the consultation document.

Site and Surrounding Area

The site is located in Willesden on the northern side of the High Road (A407) and to the south of Denzil Road. The site is broadly rectangular in shape and is located between residential properties which front Brenthurst Road to the west and industrial properties to the east.

The site measures approximately 0.71 hectares in size and currently comprises a number of low rise industrial buildings which together form the Chapmans Park Industrial Estate. Areas of hardstanding used for parking are provided adjacent to each unit. A single vehicular access into the site is provided from the A407 to the south and an internal road which runs along the eastern boundary of the site provides vehicular access to all units.

The site does not contain any statutory or locally listed buildings and there are no listed buildings in the immediate surrounding area. In addition, the site is not located within a Conservation Area. With regards to the Environment Agency's Flood Mapping, the site is located within Flood Zone 1 and is therefore considered to be at low risk of river and sea flooding.

The area surrounding the site comprises a mix of uses. Immediately adjacent to the site to the north are residential dwellings fronting Denzil Road. The area immediately adjacent to the site to the east comprises industrial uses, beyond which lies further residential dwellings. Adjacent to the site to the west are residential

dwellings fronting Brenthurst Road. Beyond this are industrial properties. To the south of the site, on the opposite side of the High Road, the area is equally mixed in use including residential dwellings along Beaconsfield Road as well as industrial uses to the southwest of the site.

The site is located in close proximity to a wide range of local amenities on Willesden High Street (located approximately 300m to the southeast of the site) including supermarkets and convenience stores, restaurants and takeaways, cafes and bars, pharmacies, hair and beauty salons, banks, community centres, and a library.

There are a number of educational facilities in the area surrounding the site, including St Andrew and St Francis Primary School (approximately 400m to the east), St Mary's Primary School (approximately 650m to the west) and College of North West London (approximately 120m to the north). With regards to healthcare facilities, Willesden Medical Centre is located approximately 600m to the southeast of the site.

The site benefits from a Public Transport Accessibility Level (PTAL) rating of 4/5 which indicates very good levels of accessibility to public transport. Dollis Hill Underground Station is located approximately 800m to the northeast of the site and Neasden Underground Station is located approximately 1.5km northwest of the site; both of which provide London Underground Jubilee Line services to Stanmore and to Stratford via Central London. In addition to this, there are a number of bus stops located on the A407 within close proximity to the site which provide access to services towards Kensal Green, Wembley and Marble Arch.

Planning History

In September 2018 R55 and Clarion Housing submitted a planning application for the following development on the neighbouring site (Land at 370 High Road and 54-68 Dudden Hill Lane, London, NW10):

“Demolition of existing buildings and erection of a series of mixed use blocks ranging from 1 to 9 storeys comprising; 258 residential units (103 x 1-bed, 119 x 2-bed and 36 x 3-bed) at 1st to 9th floors and light industrial floorspace (Class B1c), flexible employment floorspace for light industrial and/or office use (Class B1c and/or B1a), food retail floorspace/gym (Class D2), nursery (Class D1) and commercial units (flexible use for Class A1, A2, A3, A5, D1 and/or B1c) at basement, ground and part 1st floors together with associated vehicular access, car and cycle parking spaces, bin stores, plant room, landscaping and amenity spaces.” (LPA Application Ref. 18/3498).

At the time of writing this application has not yet been determined.

Participation to Date

These representations follow previous representations to the Council's Call for Sites exercise (April 2017), the Issues and Options version of the new Local Plan (March 2018) and the Preferred Options version of the new Local Plan (December 2018). Our last representations are attached to this letter for ease. We have tried to avoid direct repetition as much as possible, but it's worth noting that much of the last representations still remain valid.

Comments on the Proposed Submission version of the new Local Plan

As mentioned above, the proposed allocation for the wider LSIS (which includes the site) is welcomed by our client in principle. However, there still remains concerns with the indicative residential capacity and the requirement for supporting community facilities. These two aspects are addressed in more detail below.

Indicative Residential Capacity

The proposed allocation for the wider LSIS includes an indicative residential capacity of 200 dwellings. In the absence of more detailed information, this equates to 64 dwellings per hectare based on a site area of 3.14ha (i.e. the whole of the LSIS), or 182 dwellings per hectare based on a site area of 1.099ha (i.e. a plot ratio of 35%). We previously submitted representations to the Preferred Options version of the new Local Plan which stated that an indicative residential capacity of 200 dwellings is low given current and emerging planning policy

and guidance, and runs the risk of not making efficient use of a key brownfield site as required by paragraph 122 of the NPPF and Policy H1 of the draft New London Plan.

In response to these representations we note that LBB officers have provided the following comments within the consultation responses documentation:

“The indicative amount of residential development has been identified at an amount which at this stage in the absence of a fully designed scheme it is considered can realistically delivered on site. This takes into account the need to re-provide/ intensify industrial premises and potentially social infrastructure. It is proposed to make it clear that the indicative housing figures identified within allocations should neither be regarded as a minimum, which would take priority over other Local Plan policies, or a maximum which should limit numbers even if design solutions/ an otherwise acceptable scheme could deliver higher number of dwellings.”

However, within the GLA’s Stage 1 Report relating to the planning application on the neighbouring site (LPA Application Ref. 18/3498), we note that GLA officers stated that:

“Taking into account the proportion of non-residential land uses proposed (28%), the application would have a density of 388 dwellings per hectare and 1,064 habitable rooms per hectare. In view of the PTAL of the site and the comprehensive mixed use nature of the development, this is acceptable.” (author emphasis).

There is a stark difference between 182 dwellings per hectare (i.e. the resulting residential density based on 200 dwellings and a plot ratio of 35%) and 388 dwellings per hectare as accepted on part of the LSIS by GLA officers.

Whilst we acknowledge LBB officers’ comments that the indicative capacity should neither be regarded as a minimum nor a maximum, this has not been made clear within the allocation itself. As currently worded, the allocation runs the risk of misleading Councillors and members of the public who may expect 200 dwellings (or close to) to be delivered across the wider LSIS. Given the planning application on the neighbouring site (which proposes 258 dwellings) and comments from GLA officers on this application relating to residential density, this is unlikely to be the case. It is considered that the current indicative residential capacity is un-justified which is contrary to the requirements of the NPPF.

Given the above, it is respectfully requested that the indicative residential capacity be increased to 300 and additional text be included within the allocation itself to state that this should not be treated as a maximum.

Supporting Community Facilities

The proposed allocation of the wider LSIS includes a requirement for supporting community facilities. We previously submitted representations to the Preferred Options version of the new Local Plan which stated that the provision of any supporting community facilities should only be required if there is an identified need within the local area taking into account other sites with capacity (which might be more appropriate) and any other facilities which are delivered in the future.

In response to these representations we note that LBB officers have provided the following comments within the consultation responses documentation:

“In relation to social infrastructure needs on site, the council is aware for the need to reasonably relate these to the impacts of additional development.”

No evidence of this ‘need’ has been provided within the officers’ response. We therefore do not think that this aspect of the draft new London Plan is ‘justified’ as required by paragraph 35 of the NPPF. We still maintain that such facilities should only be required if there is an identified need within the local area taking into account other sites with capacity (which might be more appropriate) and any other facilities which are delivered in the future. It is respectfully requested that this is reflected within the wording of the proposed allocation.

Future Participation

I trust that the above is of assistance in the preparation of the new Local Plan. I would be grateful for confirmation of receipt of these representations, and would welcome the opportunity to engage further with the new Local Plan in the future. If you have any queries or would like to discuss further, please feel free to contact me.

28 December 2018



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Dear Paul

**Representations to the Preferred Options Local Plan
Chapmans Park Industrial Estate, Willesden, London, NW10 2DY**

Thank you for providing us with the opportunity to respond to the consultation on the Council's Preferred Options Local Plan (November 2018). I write on behalf of our client, Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited, who have an interest in the above site.

Within the Preferred Options document I note that the Council is proposing to retain the Church End Locally Significant Industrial Site (LSIS) designation covering the site and the surrounding industrial estates. However, I also note that the Council is proposing to allocate the site (along with the neighbouring Sapcote Trading Centre) for mixed-use housing, employment and supporting community facilities (Site Ref. BSSA3). This draft allocation is welcomed by our client, however, we have concerns with the indicative residential capacity and the requirement for community facilities for the wider site allocation.

Below I set out a brief summary of the site and surrounding, before setting out more detailed comments on the consultation document.

Site and Surrounding Area

The site is located in Willesden, to the north of the cemetery, on the northern side of the High Road (A407) and to the south of Denzil Road. It is broadly rectangular in shape and is located between residential properties which front Brenthurst Road to the west and industrial properties to the east.

The site measures approximately 0.71 hectares in size and currently comprises a number of low rise industrial buildings located within the western part of the site which together form the Chapmans Park Industrial Estate. Areas of hardstanding used for parking are provided adjacent to each unit. A single vehicular entrance is provided to the site from the A407 to the south and an internal access road which runs through the site along the eastern boundary provides vehicular access to all units.

The site does not contain any statutory or locally listed buildings and there are no listed buildings in the immediate surrounding area. In addition, the site is not located within a Conservation Area. With regards to the Environment Agency's Flood Mapping, the site is located within Flood Zone 1 and therefore is considered to be at low risk of river and sea flooding.

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The area surrounding the site comprises a mix of uses. Immediately adjacent to the site to the north are residential dwellings fronting Denzil Road. Whilst the area immediately adjacent to the site to the east comprises industrial uses, beyond this lies further residential neighbourhoods. Adjacent to the site to the west are residential dwellings fronting Brenthurst Road but beyond this are industrial properties. To the south of the site, on the opposite side of the High Road, the area is equally mixed in use including residential dwellings along Beaconsfield Road to the immediate south of the site as well as industrial uses to the southwest of the site, beyond which are further residential neighbourhoods.

The site is located in close proximity to a wide range of local amenities on Willesden High Street (located approximately 300m to the southeast of the site) including supermarkets and convenience stores; restaurants and takeaways; cafes and bars; pharmacies; hair and beauty salons; banks; community centres; and a library.

There are a number of educational facilities in the area surrounding the site, including St Andrew and St Francis Primary School (approximately 400m to the east), St Mary's Primary School (approximately 650m to the west) and College of North West London (approximately 120m to the north). With regards to healthcare facilities, Willesden Medical Centre is located approximately 600m to the southeast of the site.

The site benefits from a Public Transport Accessibility Level (PTAL) rating of 4/5 which indicates very good levels of accessibility to public transport. Dollis Hill Underground Station is located approximately 800m to the northeast of the site and Neasden Underground Station is located approximately 1.5km northwest of the site, both of which provide London Underground Jubilee Line services to Stanmore and to Stratford via Central London. In addition to this, there are a number of bus stops located on the A407 within close proximity to the site which provide services towards Kensal Green, Wembley and Marble Arch.

Participation to Date

These representations follow previous representations to the Council's Call for Sites exercise (April 2017) and to the consultation on the Council's Issues and Options Local Plan (March 2018). In both instances the site was promoted for residential uses.

Comments on the Consultation Document

As mentioned above, the draft allocation covering the site and the adjacent industrial estate is welcomed by our client. However, we have concerns with the indicative residential capacity and the requirement for community facilities across the wider site. These two points are expanded on below.

Housing

As part of the draft New London Plan, the Mayor carried out a London wide Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA) in 2017. The SHMA identifies a need for 66,000 additional homes per year within London. With regards to Brent, Table 4.1 of the draft New London Plan sets a ten-year housing target of 29,150 new homes. This equates to an annual housing target of 2,915 new homes over the ten year period (2018/19-2028/29). This is a significant increase compared to the annual housing target for the Borough contained within the current London Plan (1,525 new homes), and equates to a 91% uplift.

Policy H1 of the draft New London Plan requires Boroughs to include their relevant ten-year target within their Development Plan documents. To ensure that these targets are achieved, the policy goes on to state that:

"1) boroughs should prepare delivery-focused Development Plans which:

a) allocate an appropriate range and number of site that are suitable for residential and mixed-use development and intensification

...

2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

...

f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.” (author emphasis).

The general policy objective of the draft New London Plan to increase housing supply aligns with the Government's aspiration to “...*significantly boost the supply of homes...*” as encapsulated at Paragraph 59 of the National Planning Policy Framework (NPPF).

As mentioned above, the Council is proposing to retain the Church Lane LSIS designation covering the site and the surrounding industrial estates, but is proposing to allocated the site and the adjoining industrial estate for mixed-use housing, employment and supporting community facilities in line with Policy E7 of the draft New London Plan and Policy BE2 of the emerging Local Plan.

In accordance with Policy H1 of the draft New London Plan, the Borough should therefore be looking to optimise the potential for housing delivery across the wider site. However, it is considered that the indicative residential capacity (200 dwellings) stated within the Preferred Options document would result in an inefficient use of a key brownfield site which would not accord with Paragraph 59 of the NPPF and Policy H1 of the draft New London Plan.

Within the draft New London Plan, Policy E4, as a general principle, seeks no overall net loss of industrial floorspace capacity across London in designated SILs and LSISs. Floorspace capacity is defined as either the existing industrial and warehousing floorspace on site, or the potential industrial and warehousing floorspace that could be accommodated on site at a 65% plot ratio (whichever is the greater). With reference to the Brent Employment Site Analysis (November 2018), which forms part of the evidence base for the emerging Local Plan, the wider site currently has a plot ration of 41%. Without more detailed information and without prejudice, it is presumed that the Council would look for employment re-provision on site at a 65% plot ratio leaving 35% for residential and community uses (although the requirement for the latter is addressed below).

For the purposes of calculating residential density, a 35% plot ratio would equate to 1.1ha of the wider 3.14ha site. Based on the provision of 200 residential dwellings, this would equate to a residential density of 182 units per hectare.

Table 3.2 of the current London Plan presents density ranges for suburban, urban and central locations, based upon their PTAL rating. The site is in an urban setting with a PTAL rating of 4/5 (as stated within the Preferred Options document). Table 3.2 of the current London Plan states that urban areas of a PTAL rating of 4/5 should seek densities of between 70-260 units per hectare. Whilst the indicative capacity for the wider site would result in a residential capacity which falls within this range, it would only just be in the upper half and greater densities could be achieved. It is considered that the current indicative capacity does little to promote a greater optimisation of the site in a bid to increase housing supply.

Notwithstanding the above, the draft New London Plan proposes the removal of the current density matrix and instead seeks to optimise the use of land through a design-led approach to determine capacity of sites with regards to context, connectively and infrastructure capacity. Subject to design considerations, it is considered that a residential density greater than 260 units per hectare could be achieved at the site.

We therefore respectfully request that the indicative capacity stated for the site be increased to 300. This would help the Council to address the Mayor's emerging housing target for the Borough as it is currently unclear how the Council will meet this. The Local Plan Housing Trajectory (November 2018), which forms part of the Local Plan evidence base, sets out yearly averages up to 2041 which fall short of the Mayor's revised annual target.

Furthermore, the Local Plan Housing Trajectory shows that between 2019/20-2028/29 (i.e. the period of the emerging London Plan), the ten-year housing target will be missed by 5,439 units. On this basis alone, the Preferred Options document fails to meet the tests of soundness as required by Paragraph 35 of the NPPF.

Supporting Community Facilities

The draft allocation at the wider site is for mixed-use housing, employment and supporting community facilities. The allocation states that the location of the health, community and enterprise hub will be determined through the masterplanning exercise.

It is considered that the provision of any supporting community facilities should only be required if there is an identified need within the local area taking into account other sites with capacity (which might be more appropriate) and any other facilities which are delivered in the future. It is respectfully requested that this is reflected within the wording of the site allocation.

Future Participation

I trust that the above is of assistance in the preparation of the Local Plan. I would be grateful for confirmation of receipt of these representations, and would welcome the opportunity to engage further with the Local Plan in the future. If you have any queries or would like to discuss further, please feel free to contact me.

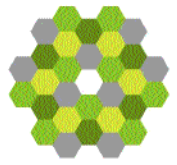
Yours sincerely

A handwritten signature in blue ink, appearing to read "O. Milne".

Oliver Milne
Senior Planner

Land Registry Official copy of title plan

Title number NGL349492
Ordnance Survey map reference TQ2184NE
Scale 1:1250
Administrative area BRENT



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