



Brent Local Plan Examination 2020

Quintain's response to the Schedule of Matters, Issues and Questions, 14 July 2020

Quintain Ltd is a major land owner and developer within the London Borough of Brent (LBB) and controls over 35 hectares of land surrounding the new National Stadium at Wembley. This area is recognised by Brent Council as suitable for major development, including retail, housing, leisure and entertainment, hotel, conferencing and offices. The land specifically lies within the identified 'Wembley Growth Area'. Quintain Ltd remain heavily committed to the comprehensive regeneration of the area and in December 2016 received outline planning permission for the latest phases of this under ref: 15/5550 and ref: 14/4931 for the Wembley Park and South West Lands Masterplans within the Wembley Regeneration Area. Reserved matters approval has now been secured for several masterplan plots which are now either completed and occupied or under construction, delivering over 7,000 new homes. Further masterplan plots are due to come forward over the next five years.

It is necessary for the new Brent Local Plan document and policies to respond positively to the changing pressures being faced within the Borough. In so doing we would be grateful if you would kindly take into account the suggestions put forward in these further responses to the MIQs issued on 14 July 2020. As you will be aware, Quintain submitted representations on the Regulation 18 and 19 consultations (dated 03 January 2019 by WYG and 05 December 2019) and wish to take this opportunity to focus on the specific issues and questions raised by the Inspector in the context of our original submission where matters have not been incorporated into the emerging Plan.

Matter 5-Housing

Paragraph 5.10 of MIQs: Are policies BH2 (Priority Areas) and BH3 (Build to Rent) in the Plan sufficiently flexible in their purposes and are they justified and effective? Are these policies consistent with the London Plan and the National Planning Policy Framework (the Framework)? What evidence is there to support these policies?

Quintain's response:

Policy BH2- Priority Areas for Additional Housing Provision Within Brent

Policy BH2 is unsound because it is inflexible and onerous and does not justify the requirement to re-provide existing commercial floor space on sites that are delivering new housing. Whilst it is accepted and supported that in many proposals some commercial floor space will provide ground floor activity and important local employment opportunities, the amount provided should be determined on a case-by-case basis. This would ensure there is a viable requirement for this type and amount of use in the local area. Application of this policy on all sites is likely to affect the viability of many new developments, resulting in a lower provision of affordable housing and delivery of other policy aims.

As previously stated in our Regulation 19 representations (page 22), LBB have not provided sufficient evidence of the impact of this policy on viability nor have they provided sufficient evidence of the



need for commercial floor space regarding provision within town centres, edge of town centres and intensification corridors.

Suggested text change:

We consider a new bullet point should be included within the policy which states:

“c) where this requirement would detrimentally impact upon the viability of the scheme.”

Policy BH3- Build To Rent

Quintain’s response:

Policy BH3 is not sufficiently flexible to encourage the delivery of Build-to-Rent developments in the Borough. The policy should provide additional guidance on how Built-to-Rent developments will be considered and assessed in terms of meeting specific design standards for Build-to-Rent developments, as previously stated on page 24 of our Regulation 19 representations.

The emerging Brent Local Plan does not take account of the clear differentiation between Build-for-Sale developments and Build-to-Rent developments, which is a key consideration when designing schemes and securing planning permission. Consequently, the plan does not provide a justified or effective basis for assessing and supporting this new tenure of housing.

Policy BH5- Affordable Housing

Paragraphs 5.36 and 5.37 of the MIQs:

5.36- In relation to concerns raised by Transport for London Commercial Development, does the requirement within policy BH5 for 100% of ‘Build to Rent’ developments to be at the London Living Rent (LLR) level result in a significant restriction in the range of genuinely affordable rents available in the Borough? Does the policy, as submitted, limit the affordable housing mix and balance in the Borough? Is policy BH5 in accordance with the London Plan in this regard?

5.37- Would amending policy BH5, for example by reducing the proportion of affordable ‘Build to Rent’ units at the LLR level to 30%, ensure that a greater range of genuinely affordable homes would be secured in Brent than the policy would achieve as submitted? If so, how? Where is the evidence to support this?

Quintain’s response:

We have submitted further representations to policy BH5 within a separate document, dated August 2020 by Quod. Please refer to the enclosed document for our comments.

Policy BH6- Housing Size Mix



Paragraph 5.40 of the MIQs: Given the high preponderance of flatted development anticipated, particularly in town centres, how is the target for more family housing (i.e. 25% of all new housing to be 3 bedroom-plus dwellings) in policy BH6 to be achieved? Is this target reasonable, justified and effective? What evidence is there to support it? Does this approach accord with the London Plan?

Quintain's response:

Quintain agrees that, due to the high proportion of flatted development, the target for all development to deliver 25% family housing will be unachievable and will have a detrimental impact upon scheme deliverability and viability. Quintain's previous objections on page 26 of our Regulation 19 representations refers to the limitations of the proposed policy in terms of its effectiveness and viability.

Policy BH6 is not sufficiently justified in that it refers to a need for more family sized dwellings in Brent but does not explain the type and form of the accommodation nor assess the demand. For example, in Growth Areas such as Wembley Park where all new residential development is delivered as apartments with shared communal gardens, whilst 3 and 4 bed accommodation is provided there is very limited uptake of these units by families. This is on the basis that families are predominantly attracted to the lower density suburban areas of the Borough where for a similar price, and in some cases less, they can secure semi-detached and detached homes with private gardens and drive ways.

New developments should therefore be encouraged to provide a complementary mix to the suburban neighbourhoods of the Borough which would have the benefit of allowing residents to 'downsize' their property and also reduce the demand to convert large family homes into HMOs. This would be in accordance with Policy H10 of the emerging London Plan which recognises the importance of 1 and 2 bedroom properties in freeing up family housing.

Furthermore, policy BH6 as currently drafted is not justified when considered against paragraph 122 of the NPPF which states that planning policies should take into account the identified need for different types of housing rather than the number of bedrooms and should also take local market conditions and viability into consideration.

Policy BH13- Private Amenity

Paragraph 5.48 of the MIQs: Is policy BH13 reasonable and effective in delivering sufficient external private amenity space in higher density developments such as flats? Where such space cannot be provided in full, is it reasonable and justified to expect that the remainder would be supplied in the form of communal amenity space? Where is the evidence to support this approach?

Quintain's response:

Quintain supports the flexibility introduced through including high quality communal amenity space in paragraph 6.2.100 to supplement private amenity space within developments. This is essential if the Local Plan is to support high density development and enable the Borough to meet its housing targets. However, we consistently raised concerns over the effectiveness of applying a standard 20sqm private amenity space figure to all units irrespective of their size, type, tenure and location.



To ensure the policy is both reasonable and effective it should go further to recognise different types of development and the challenges higher density developments have with reaching this target. As referred to on page 30 of Quintain's Regulation 19 representations, the increased housing targets and densities are not recognised in this policy. This policy is outdated and needs to be more detailed by relating the amenity standard to the size of residential units and the number of occupiers to ensure the policy is effective.

Matter 7- Design, Heritage and Culture

Policy BHC2- Heritage

Paragraph 7.13 of the MIQs: Does policy BHC2, as drafted, sufficiently and appropriately balance the need to protect important views of the National Stadium from the surrounding area against the need for development within the Wembley Growth Area? If not, how should the policy be changed?

Quintain's response:

Quintain consider Policy BHC2 should be amended to include the word 'significant' when considering the impact on views of the National Stadium as previously stated on page 31 of our representations. This would ensure that development within the Wembley Growth Area would not be unduly restricted whilst also protecting views of the Stadium.

Suggested text change underlined below:

"Development must not be to the significant detriment of the following views as shown on the Policies Map of the National Stadium Wembley."

Matter 9- Places (Site Allocations)

Site Allocation BCSA11- College of North West London

Paragraph 9.4 of the MIQs: How have the indicative capacity figures for each of the site allocations been arrived at? Should these capacity figures be expressed as a minimum and are the site allocations sufficiently flexible in this regard?

Quintain's response:

Quintain agree that all capacity figures within the Local Plan should be expressed as minimum figures. This will ensure the plan is sufficiently flexible to allow the Council to consider detailed proposals which, through innovative design, bring forward high quality and high density developments that demonstrate the capacity figures contained within the Local Plan can be enhanced. In almost all developments within Wembley Park the Council's capacity figures have been exceeded.



Site Allocation BCSA2- Stadium Retail Park and Fountain Studios

Paragraph 9.14 of the MIQs: Is site allocation BCSA2: Stadium Retail Park and Fountain Studios sufficiently flexible in relation to the level of retail provision to be provided on the site?

Quintain's response:

The policy is not flexible in relation to the level of retail provision to be provided on site, as previously stated on page 12 of our Regulation 19 representations. Moreover, the policy is not justified on the basis that there is now a resolution to approve the redevelopment (planning application 17/3059) of this site without the onerous retail provisions contained within Policy BCSA2. On this basis, the wording should be deleted.

End of note