



19 August 2021

Paul Lewin,
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Dear Mr Lewin,

Main Modifications to the Draft Brent Local Plan

We write on behalf of our client, The V Fund Limited, to make representations to the proposed Main Modifications to the Draft Brent Local Plan. We write in relation to our clients interest in the Wembley Waste Transfer Facility located on Fifth Way, Wembley HA9 and OJD (hereafter referred to as the 'Site'), as shown on the site location plan (enclosed at Annex 1 of this letter).

X-Bert Haulage Ltd (XBHL), trading as Glynn skips, operate at the Wembley Waste Transfer Facility, Fifth Way, Wembley, London, HA9 0JD. In 2018, XBHL expanded their waste operations in Neasden, with the intention of closing down their Wembley facility so that they could bring it forward for redevelopment. For over a decade, the Wembley Site has been identified for redevelopment and since 2018, XBHL have been in pre-application discussions with the Council about its redevelopment. The Council have confirmed their in-principle support for the redevelopment of the Site during these pre-application discussions. Pre-application discussions are ongoing in relation to a mixed use development comprising purpose built student accommodation and industrial workspaces, and it is anticipated that a planning application will be submitted in late 2021 / early 2022.

Over the last five years waste throughput at the Wembley facility has primarily been for the processing of waste materials from their Neasden facilities. The Wembley facility has continued to be used for operational convenience and to offset some of the fixed costs of the Site, but it is progressively being consolidated into the Neasden sites such that no tonnage will be managed from Wembley in the near future.

Site Allocation

The Site was previously split between two site allocations 'BCSA4' and 'BCSA9'. The modifications to the Policies Map proposes to move the northern part of the Site into allocation BCSA9, previously BCSA4. As a result, the entirety of the Site is proposed to be allocated within BCSA9 for: "*Residential-led mixed use development, including education and industrial*".

The Council proposes to remove reference to student accommodation from the *Allocated Use*; however, following discussions with [REDACTED] Planning Policy Officer at the London Borough of Brent, we understand that the modification has been made to conform with the London Plan (2021) which confirms that net non-self-contained accommodation for students counts towards meeting housing targets. The term "*Residential*" is therefore being used by the Council as an overarching term which includes both self-contained and non-self-contained accommodation. Non self-contained accommodation includes student housing, and housing for older people, plus other types of non self-contained housing. Site Allocation BCSA9 as proposed to be amended will therefore support all types of residential uses, including student accommodation.



For clarity, we request that the Council make clear in the wording of the Draft Local Plan that where the Site Allocations refer to 'Residential' this is inclusive of non-self-contained accommodation for students, as well as older people etc... We request that an additional paragraph is added after 4.15, amends are made to paragraph 6.2.29 and a new paragraph is added between 6.2.57 and 6.2.58.

<p><i>Add 4.16 Where 'Residential' uses are identified for the Allocated Use of the specific sites set out in the Places in the next chapter, this refers to self-contained and non self-contained accommodation (including accommodation for students and older people etc...).</i></p>
<p><i>6.2.29 Wherever it can the Local Plan seeks to identify specific sites on which new homes will be delivered. Where 'Residential' uses are identified for the Allocated Use of the specific sites set out in the Places chapter, this refers to both self-contained and non self-contained accommodation (including accommodation for students and older people etc...). The spatial strategy focuses the majority of development in Growth Areas. Five of these have been taken forward from the previous Local Plan with additional capacity identified within their existing boundaries and in some cases through their extension. In addition, three new Growth Areas, including two taking advantage of better connectivity provided by new rail stations, have been identified.</i></p>
<p><i>6.2.57 The majority of housing needs will be met through self-contained residential accommodation. However, some will be met through non self-contained accommodation with shared facilities (such as houses in multiple occupation, shared living or purpose built student accommodation). It might also be more institutional in its form as self-contained or non-self-contained accommodation that shares facilities or requires additional on-site support for residents (such as hostels, or extra care facilities). The policy seeks to provide greater clarity on how the council will support development proposals for these uses through the planning process.</i></p> <p><i>ADD: Where 'Residential' uses are identified for the Allocated Use of the specific sites set out in the Places chapter, this relates to self-contained and non self-contained accommodation such as that identified in paragraph 6.2.57.</i></p> <p><i>6.2.58 For the purposes of this policy shared housing includes houses in multiple occupation (HMOs), bed-sits, hostels, housing for older people, supported housing for those with special needs, shared-living and specialist student accommodation. It also includes accommodation providing any level of care, whether non self-contained or self-contained units with a small amount of communal facilities. The policy seeks to protect the amenity of existing areas and create a good standard of accommodation in locations that are likely to be more suited to meeting occupiers' needs. It also protects existing sites where there is currently such provision.</i></p>

We support that the Council has made clear within the site allocation (BCSA9) that the Site falls within the Tall Building Zone, and that it is therefore suitable for tall buildings.

Safeguarded Waste Site

The Council propose to identify safeguarded waste sites as set out in the West London Waste Plan on their Policies Map. It is noted that the area of the Site to the north of Fifth Way is used for storage and staff welfare facilities only and does not have an Environmental Permit. As such, we question whether the site area to the north of Fifth Way should be shown on the Policies Map as a safeguarded waste site.

Tall Buildings

Within previous versions of the Draft Local Plan, the Site fell within the ‘Core’ designation of the Wembley Park Tall Building Zone. However within the proposed Modifications, the Core designation is proposed to be deleted. The Site would remain within the Tall Buildings Zone where buildings up to 102m high would be appropriate. This is supported.

The site allocation identifies the Site as being suitable for tall buildings. This is supported.

Housing and Student Accommodation

Please see comments above in relation to amendments we request to make the Draft Local Plan clear that student housing (and other non self-contained housing) is supported by the Council on sites allocated for residential use.

Non Designated Industrial Sites

Policy BE3 relates to Local Employment Sites outside of SIL and LSIS in employment use. The policy states that *“The Council will only allow for the development of Local Employment Sites for non-employment uses where: a) continued wholly employment use is unviable; or b) development increases the amount of workspace as well as retaining the existing employment use or provides the additional workspace as affordable studio, research and development, light industrial or general industrial workspace, with maker space in light industrial prioritised to meet demand...”*

Given the allocation of non-designated industrial sites for residential-led development (such as Site Allocation BCSA9), the policy wording and supporting text should acknowledge that these allocated sites would be supported for development. This is considered acceptable as the site allocations themselves identify industrial use as part of the *Allocated Use* and *Planning Considerations*. Requested amendments are shown below:

POLICY BE3 LOCAL EMPLOYMENT SITES AND WORK-LIVE

Local Employment Sites have an important role to play in ensuring that a range of employment premises are available to meet employment needs, including ensuring the need for additional industrial floorspace capacity is met in the borough. The council will require their retention. Where possible their use for research and development, light industrial, general industrial or storage and distribution will be intensified. The Council will only allow the development of Local Employment Sites to for nonemployment uses where:

- a) continued wholly employment use is unviable; ~~or~~*
- b) the site is allocated for development in the Places chapter; or*
- ~~b) c) development increases the amount of workspace as well as retaining the existing employment use or provides that additional workspace as affordable studio, research and development, light industrial or general industrial workspace in the B use class, with maker space in light industrial use prioritised to meet demand.~~*

Where criterion a) is being used to justify the release, the maximum viable replacement of the existing employment floorspace will be sought.

Where criterion ~~b~~ c) applies, if within the existing or emerging creative clusters of Harlesden, Wembley Growth Area, Willesden Green, Alperton Growth Area, Kilburn, Kensal Green, Neasden, Queen’s Park,

Burnt Oak Colindale Growth Area, and Church End Growth Area, affordable workspace is to be provided on-site. Elsewhere, if affordable workspace is considered unlikely to be successful, financial contributions will be secured to provide equivalent affordable workspace elsewhere.

Work-Live units will be acceptable where they are managed by an organisation committed to their use primarily for employment, as evidenced by a management plan. Loss of Work-Live units to residential will be resisted.

The supporting text to this policy should be updated accordingly.

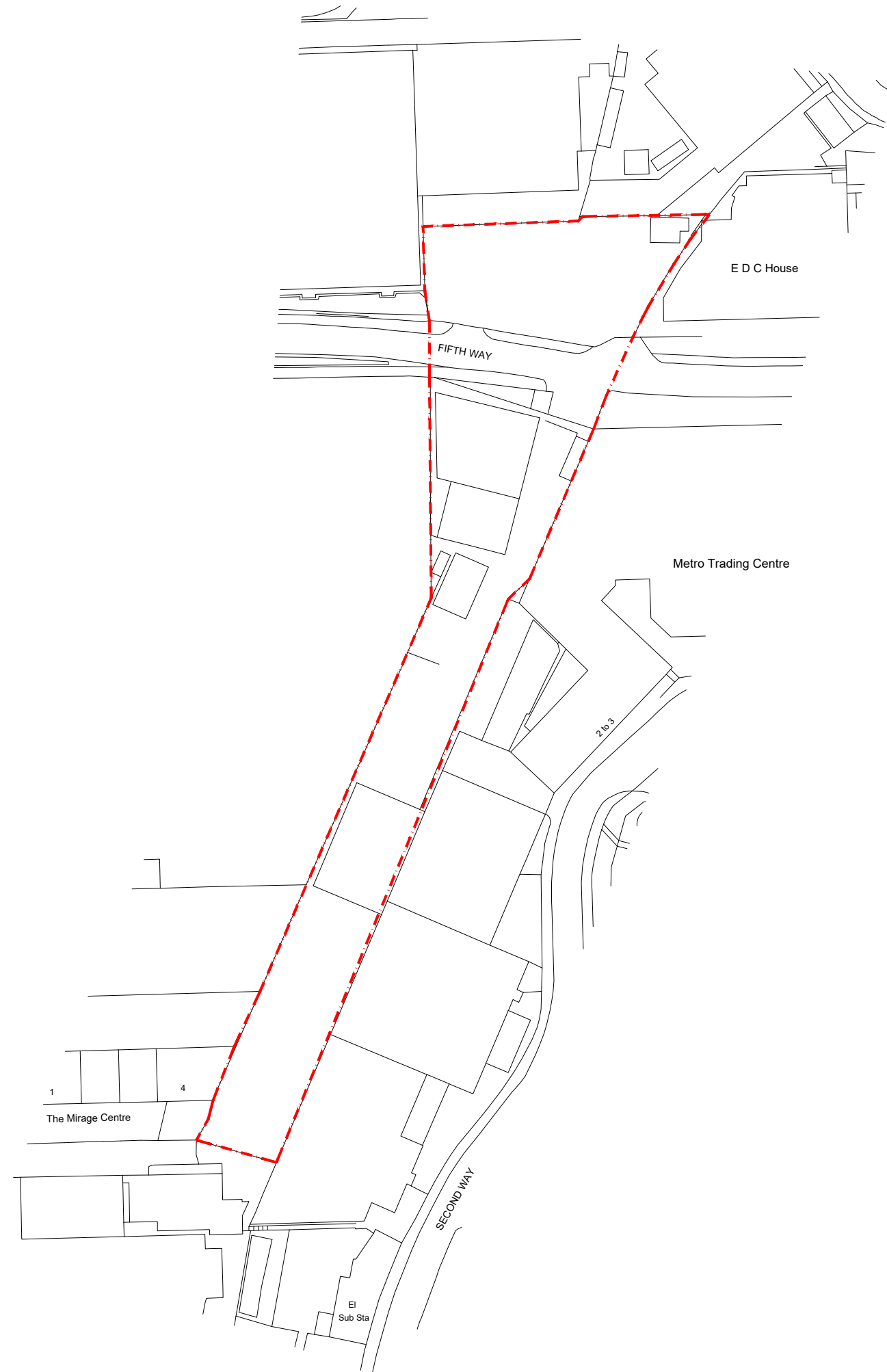
Future Participation

We trust that the above representations will be taken into account and that accordingly the requested amendments will be made to the Draft Local Plan. We would be grateful for confirmation of receipt of these representations and would welcome the opportunity to engage further about the comments raised within our submission should you have any queries or would like to discuss further. We also look forward to continuing our pre-application discussions in relation to the redevelopment of the Site.

Yours sincerely




Savills Planning



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Notes

- 1 All dimensions are in millimeters.
- 2 Dimensions are not to be scaled directly from this drawing.
- 3 All dimensions are to be checked on site and the Architect is to be informed of any discrepancies before construction commences.
- 4 All references to drawings refer to the current revision of that drawing.
- 5 Structural and services information shown is indicative only. Refer to Consultants drawings for details and setting out.

Rev	Description	Date	By	Chk
PXX	Description 1			
	Description 2			



22-24 Victoria Parade
London
SE10 9FR



www.buj.co.uk

Job title
Wembley Edge

Drawing title
Site Location Plan

Scale Sheet size Date
1:1250 A3 04-06-2020

Project Originator Vol Level Type Role Number
1557-BUJ-ZZ-GF-DR-A-0001

Suitable for Suitability Revision
Information S0-P00